

North Coast Regional Water Quality Control Board

M e m o r a n d u m

Date: October 9, 2026

To: California Department of Transportation

Attention: Keith Pelfrey

North Region Environmental–District 2

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From: North Coast Regional Water Quality Control Board

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Subject: Scott River Bridge Replacement Project PM 71.0 - 71.5, Initial Study with Proposed Negative Declaration and Proposed Section 4(f) de Minimis Determination (EA 02-0H730, SCH# 2026090391)

On September 14, 2026, the North Coast Regional Water Quality Control Board (Regional Water Board) received a draft Initial Study and Proposed Mitigated Negative Declaration (draft IS/MND) from the California Department of Transportation (Caltrans) for the Scott River Bridge Replacement Project (Project), in Siskiyou County, California. The draft IS/MND reviews and evaluates the potential impacts from replacing the Scott River Bridge and roadway approaches on State Route 96 in Siskiyou County, from post mile (PM) 71.0 to 71.5, two miles east of Hamburg, California. The Regional Water Board hereby submits the following comments.

Regional Water Board Permitting

The proposed Project will require a Water Quality Certification under section 401 of the Clean Water Act (33 U.S.C. § 1341) for activities within or affecting waters of the U.S. and waters of the State. If the U.S. Army Corps of Engineers does not take jurisdiction over the impacted aquatic resources, the proposed Project would require a Waste Discharge Requirement under the Porter Cologne Water Quality Control Act. There is also a potential need for a Construction General Permit.

Regional Water Board comments:

1. Chapter 1.2: Project Description; Table 1. Pier Dimensions, page 7.

Comment 1): The new bridge will be 11 ft longer and 12 ft wider than the existing bridge and includes two (2) additional piers. The increased shading of the stream channel and

riparian area will be considered as a permanent impact when applying for 401 Certification. The increased foot print of four (4), 4 ft piers will be considered as a permanent loss impact to streams.

2. Chapter 1.2: Project Description: Construction Activities, Installation of Stream Diversion and Construction of In-Water Gravel Work Pads, pages 8- 9.

(page 8): "To install the gravel pads, the contractor would gradually push clean spawning gravel (washed clean 3-inch cobble suitable for spawning for salmonid species) into the flowing channel."

Comment 2): While installing the gravel pads, adequate depth, flow, and velocity must be maintained to allow fish passage and not result in scour.

(page 9): "The gravel work pads may be removed and reinstalled between construction seasons."

Comment 3): Plan to remove and reinstall the gravel work pads between construction seasons.

(page 9): "It is anticipated that an area approximately 25 feet wide x 25 feet long would be temporarily dewatered."

Comment 4): Explain the purpose and method of dewatering this area.

(page 9): "A temporary water diversion system may be used to divert upstream water flows to allow construction in the dry or dewatered location."

Comment 5): Prior to work within the active channel, a temporary creek diversion system plan and water quality monitoring plan will be required for Regional Water Board review and approval.

3. Alternatives Analysis (page 19): Includes 1) No Build Alternative, 2) Bridge Rehabilitation, 3) Bridge Replacement

Comment 6): Unless an exemption can be used in applying for 401 Water Quality Certification, the applicant must submit an alternatives analysis consistent with the requirements of section 230.10 of the State Supplemental Dredge or Fill Guidelines that allows the permitting authority to determine whether the proposed project is the Least Environmentally Damaging Practicable Alternative (LEDPA).

4. Wetlands and Other Waters (page 96): "Collectively, removal of the existing bridge and construction of the new bridge would result in net permanent impacts to approximately 0.004 acres (~24 linear feet) of riverine habitat."

Comment 7): In submitting an application for 401 Water Quality Certification, all impacts to aquatic resources are to be accounted for. The Regional Water Board will determine any offsets to permanent impacts.

5. Critical Habitat and Essential Fish Habitat (page 98): "Construction-related disturbance could result in temporary increases in turbidity within the Scott River. In-water work, consisting of the placement of temporary piles for the new bridge's falsework and trestle, temporary gravel work pads, temporary water diversions, and the installation of new bridge piers could result in temporary alteration of the channel and a temporary increase in flow velocity. These temporary changes could affect critical habitat."

Comment 8): Prior to work within the active channel, a water quality monitoring plan will be required for Regional Water Board review and approval.

6. Off-site Mitigation (page 99): Caltrans plans for off-site mitigation and advance mitigation projects include the Noyes Valley Instream and Floodplain Restoration Project, Sugar Creek Refugia Phase III Project, and/or the French Creek Fish Passage and Restoration Project.

Comment 9): For permittees who intend to fulfill their compensatory mitigation obligations by securing credits from approved mitigation banks or in-lieu fee programs, their mitigation plans need include items i, ii, and iii, as described below, as well as information required in the State Supplemental Dredge or Fill Guidelines, section 230.94 (c)(5) and (c)(6), and the name of the specific mitigation bank or in-lieu fee program proposed to be used.

Draft compensatory mitigation plans shall comport with the State Supplemental Dredge or Fill Guidelines, Subpart J, and include the items listed below.

- i. A watershed profile for the project evaluation area for both the proposed dredged or fill project and the proposed compensatory mitigation project.
- ii. An assessment of the overall condition of aquatic resources proposed to be impacted by the project and their likely stressors, using an assessment method approved by the permitting authority.
- iii. A description of how the project impacts and compensatory mitigation would not cause a net loss of the overall abundance, diversity, and condition of aquatic resources, based on the watershed profile. If the compensatory mitigation is located in the same watershed as the project, no net loss will be determined on a watershed basis. If the compensatory mitigation and project impacts are located in multiple watersheds, no net loss will be determined considering all affected watersheds collectively. The level of detail in the plan shall be sufficient to accurately evaluate whether compensatory mitigation offsets the adverse impacts attributed to a project.

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7. Avoidance and Minimization Measures (page 128): "The contractor will prepare and submit a temporary work platform (falsework and trestle) plan for review and approval by Caltrans. Caltrans will submit the temporary work platform plan to NMFS and CDFW for review and concurrence."

Comment 10): Please also submit the temporary work platform plan to the Regional Water Board for review and concurrence.

Thank you for providing the opportunity for the Regional Water Board to comment on this draft IS/ND. If you have any questions or comments or would like to discuss these recommendations, please contact Environmental Scientist, Susan Stewart at (707) 576-2657 or by email at Susan.Stewart@waterboards.ca.gov.

Best regards,

Susan Stewart
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