



3/14/2011

Arnold Whitridge, Chairman
Trinity Adaptive Management Work Group
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Mr. Whitridge:

The Trinity River Guide Association (TRGA) respectfully requests that the Trinity Management Council impose a moratorium on mainstem Trinity River projects until a Phase 1 Adaptive Management evaluation is completed and presented to the public, as stated in the Implementation Plan for the Trinity River Record of Decision: **“an interim period without construction activities...to fully evaluate the effectiveness of project designs and the effect of the new flow regime before beginning construction on the remaining sites.”** (Appendix C to the Final EIS/EIR for Trinity River Mainstem Fishery Restoration). The potential adverse environmental impacts of TRRP could not and cannot be properly evaluated without the interim period devoid of construction activities, as contemplated by the EIS/EIR.

The TRGA represents the recreational sportfishing guides on the 110+ river miles of the Trinity River. We collectively average approximately 10,000 client days each year. The recreational sportfishing value of the Trinity River and its anadromous fishes spans almost a 10 month season – one of the longest recreational seasons of any West Coast river systems – and contributes approximately 4 million dollars annually to the economies of Trinity, Humboldt, and Shasta Counties.

We support the overall goals of Trinity River Restoration Program (TRRP) to restore salmon and steelhead populations in the Trinity River through effective flow and habitat improvements. Success for the TRRP should directly translate into success for a healthy and sustainable Trinity fishery, and thus benefit the local economy through Trinity River guides, outfitters, anglers, local businesses, and other river stakeholders with higher numbers of returning anadromous fish each year.

However, based on tens of thousands of hours of personal observations on the river we believe that the aggressive mainstem channel projects over the past few seasons may have adversely impacted adult fish holding habitat upstream of the North Fork and have resulted in excessive fine sediment deposition in the river. It is apparent that excessive – and often ill-timed – amounts of earth moving, combined with the placement of large amounts of spawning gravel and a lack of high flow releases has filled in many of the pools where adult spring Chinook, summer steelhead, and other species hold over during summer months, ultimately harming the river ecosystem as well as the health and viability of the fishery. Current restoration efforts seem to focus exclusively on spawning and juvenile rearing habitat, with little to no attention paid to maintaining necessary adult holding water. While we absolutely agree that spawning and rearing habitat is vital, adult fish habitat is equally relevant but has not been considered in the planning phases of Phase 1 (or Phase 2) restoration projects.

The Trinity River Record of Decision (ROD) describes only three side channels. However, many more side channels have already been constructed during Phase 1 and more are being slated for construction in Phase 2, far exceeding the three originally considered in the ROD. The Trinity ROD envisioned just enough channel modification to allow flows – both through dam releases and natural accretion from tributaries – to do the rest of the work, but we fear that the mainstem projects have gone too far. The excessive widening of the channel dilutes the power of the river to change the shape of the river to create the necessary holding waters for anadromous fish.

Specifically, an Adaptive Management evaluation of mainstem projects should address the reduction in the number and size of pools in the Trinity River upstream of the North Fork, and especially in the stretches of river between Lewiston Dam and Douglas City. Have pools been filled in, and if so why and by how much? We also think it is imperative to see how existing sites are altered by high flows before constructing any additional projects. TRRP has consistently stated that the projects are designed to be beneficial only after high flow events impact the river. Any evaluation of the projects should specifically catalog the before-and-after effects of a seasonal high-flow event. If it is determined that existing project designs combined with higher flows are inadequate to maintain a restored river channel, it would be unwise to invest additional funding on the same failed design criteria for Phase 2. Additionally, those sites that have been damaged by failed restoration projects should be repaired to pre-project status.

We understand some may be concerned that not utilizing funding in 2011 could jeopardize funding in future years – the “spend it or lose it” approach. However, given the fact that watershed restoration projects have been significantly underfunded since the Trinity ROD was signed, it is clear that a substantial amount of money can be put into watershed and tributary restoration while the mainstem program undergoes a period of evaluation and/or reparation. The ROD itself contemplated \$2 million per year in tributary watershed work. Given the large amount of fine sediment in the mainstem and tributaries, as well as the reduced flows due to construction and operation of the Trinity River dams, it is clear that significant progress has yet to be made in reducing fine sediment inputs as required in the Trinity ROD. Greater attention to the tributaries during an evaluation moratorium in the mainstem would address the fine sediment problem.

The TRGA not only supports funding from the TRRP for tributary projects, we offer to play an active role in those projects by assisting in obtaining property owner approvals as well as volunteer physical work. Moreover, we offer our assistance, experience, and expertise on the Trinity River, in whatever forms we are able to help.

Thank you for your consideration of our request. We would greatly appreciate a written response.

Respectfully submitted,

Trinity River Guide Association

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