



Keeping Northwest California wild since 1977

December 13, 2011

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RE: Concerns over impacts to Coho Salmon in the Trinity River

Dear Responsible Officials,

I am writing on behalf of the Environmental Protection Information Center (“EPIC”), a nonprofit organization that works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in northwestern California. EPIC supports the restoration of the Trinity River and generally supports the work of the Trinity River Restoration Program (“TRRP”).

In its Biological Opinion (“BiOp”) for the Trinity River restoration activities, the National Marine Fisheries Service (“NMFS”) evaluated the restoration activities and flow schedules on several imperiled species, including the Southern Oregon / Northern California Coast (“SONCC”) Coho Salmon. EPIC believes that new information exists that may require the re-initiation of consultation with NMFS over the TRRP impacts on SONCC Coho Salmon. Specifically, new information exists that: 1) SONCC Coho have continued to decline in the Trinity River and throughout their range as evidenced by a recent status review, and 2) that some restoration activities, such as the injection of gravel into the mainstem, may negatively impact this species and their critical habitat by filling in deep pools. It should be noted that the BiOp did not evaluate this specific impact and instead relies on monitoring, subsequent consultation and adaptive management.

EPIC respectfully requests that your agencies re-evaluate the impacts of TRRP activities on SONCC Coho and other aquatic species. In addition, we request that your agencies delay the approval of further restoration activities, particularly the injection of gravel into the mainstem, pending ongoing scientific review of “Phase 1” activities and consultation with NMFS.

Sincerely,

Andrew Orahoske, Conservation Director
Environmental Protection Information Center

Cc: Irma V. Lagomarsino, National Marine Fisheries Service

Environmental Protection Information Center

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