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1/24/2012

Brian Person, Chair
Trinity Management Council
Bureau of Reclamation
16349 Shasta Dam Blvd
Shasta Lake, CA 96019

Mr. Person:

We understand that during the past few weeks some of the public comments made by individual members of the Trinity River Guide Association (TRGA) may have been inconsistent and thus clouded some of the issues concerning the Trinity River Restoration Program (TRRP). We regret and apologize for any confusion and inconvenience this may have caused, and we write at this time as a unanimous Board of Directors on behalf of TRGA to clarify TRGA's positions.

The TRGA board and membership have met and reviewed the documentation and discussions from the December 19 TRRP Design Team meeting, as well as the January 4 TMC meeting, and have come to a consensus agreement regarding TRGA's opinion and policy towards TRRP projects for the upcoming 2012 project season.

We support the Steiner Flat project, conditional to the plans as described and approved on the December 19 Design Meeting, with specific reference to the project designs downstream of (and excluding) IC-6, with the gravel bar at IC-14 as a "skeletal bar" only with no gravel smaller than six inch diameter, and with the corollary condition that there will be no additional gravel or fine sediment augmentation added to this site in particular, or *any* additional gravel injection into the river at *any* other sites in the 2012 project cycle, or until a thorough Phase I review and gravel analysis has been completed, analyzed, and had ample opportunity for public comment.

We tentatively support certain aspects of the Junction City project, with the caveat that we continue to have grave concerns specifically pertaining to the 60/40 split flow channel and subsequent "island" introduction to the river. While we agree with the majority of the project design and appreciate the efforts the Design Team took to address concerns related to adult holding water, we nonetheless find the split flow portion of the design to be too risky a venture with relation to the quality adult salmonid holding water associated with the site, both in the immediate proximity of the proposed island and the downstream deep pools. It is apparent that, if the project proceeds as planned and no natural changes occur, the current design would likely be acceptable; however, as described in a "dynamic river" system, change is likely to occur and will be unpredictable, proposing unacceptable risk to crucial adult salmonid habitat. For example, if the right side of the channel should fill in with gravel (the likelihood of which is compounded by a chronic program tendency to inject too much gravel in the river), the result would likely push excessive hydrological velocity towards the gravel bar and would result in filling in the crucial adult holding water pools below.

We also have concerns pertaining to the bank enhancement for the Junction City property owner at IC-4. We understand the TMC's concern to protect its current and future liabilities for repairing/working on private landowners' properties; it is nonetheless a valid concern for property owners, that if they allow work to take place on their property, and the direct results of that work create negative impacts to their property values, that they should have some protection in the interim. At the very least, the agreement to work on private property combined with a protective bank-enhancement should be a reasonable request from the landowners' standpoint.

Furthermore, the TRGA continues to publicly denounce *any* gravel augmentation or injection in the Trinity River for the duration of the 2012 project cycle (or, at a minimum, until the Independent Phase I Review is completed, both the official review and the public comment period). It is our contention based upon tens of thousands of hours of observation and river interaction, that there is an overwhelming surplus of gravel currently available in the river through an excessive augmentation/injection program in recent years. If gravel is planned for augmentation at any of the sites for 2012, or if it is scheduled for injection during a high flow event, the TRGA will withdraw its support for the aforementioned projects, as we contend that there is already too much gravel in the river and strongly believe that the Phase I review should be completed before any additional gravel is added to the excess already available in the river. This review process is mandated in the Record of Decision: **"an interim…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).

Of grave concern to the TRGA is the proposed – and pending – pool depth study. We wish to know (and have asked in several different forums without formal response) what the specific criteria of the pool depth study are? Which pools, in particular, are being studied? Is it just the deepest pools, which are less likely to be impacted by the overwhelming influx of gravel than the medium-depth pools which we observe filling in at increasing levels as gravel injections continue? Or will the entire river bottom be mapped out to analyze the chronic observed shallowing of the river above the North Fork?

The bottom line remains that there is currently too much gravel in the river, from an excessive amount of augmentation and injection in recent years. The river needs a respite, an opportunity to flush out the influx of gravel currently filling in the crucial habitat of adult salmonid holding water for steelhead, Chinook, and Coho salmon.

The TRGA appreciates the willingness of the TRRP Design Team to work with TRGA members for the betterment of the river as a whole, as well as the surface efforts of TAMWAG and TMC members in working towards the progressive concept of adaptive management. We hear the phrase "adaptive management" constantly re-iterated – and it is swiftly becoming the nomenclature for all future restoration efforts and re-licensing processes across the region and the country – but the concept of adaptive management cannot be successful practiced with regards to the TRRP unless the agencies and stakeholders involved pay attention to the fact that the overwhelming influx of gravel has not behaved as predicted by scientific modeling programs. The problem seems to lie in the reluctance of some to evaluate the activities to date and to acknowledge that the system has not responded exactly as anticipated (i.e., accumulation of gravel and fine sediments). Putting a hold on future gravel introduction and waiting to reevaluate after the Phase I review would be, of course, the epitome of adaptive management.

Tributaries and watershed work remain another focus for the TRGA. We understand that TRRP has begun the early stages of working for watershed design strategies, and we strongly encourage a more consistent, concerted approach towards watershed management, further improving crucial spawning and rearing habitat for Trinity River salmonids. Watershed work would not only benefit the mainstem Trinity and its anadromous fish, but would also allow restoration work to continue while mainstem Phase I projects are analyzed and reviewed – as mandated by the Record of Decision – before further pursuit of potentially disastrous Phase II projects.

We would also like to see a public commitment on the part of TRRP to redress prior failed sites. There are numerous past projects from the past few years that have been unsuccessful, with some side channels filling in with gravel, other side channels de-watering the primary channel, alcoves filling with fine sediment, and primary holding water filled in with gravel, etc. Pools that have been destroyed should be fixed, preserving habitat for adult fish, as opposed to an over-emphasis on juvenile habitat.

In summation, the TRGA re-iterates that we remain committed to the betterment of the Trinity River ecosystem, and look forward to continuing to work progressively with all stakeholders and restoration staff. Collectively, we have tens of thousands of hours of personal, first-hand experience with the Trinity River and its salmon and steelhead, and we're dedicated to preserving – and hopefully even enhancing – the Trinity River experience for everyone who calls it home.

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

Respectfully submitted,

Trinity River Guide Association

Bill Dickens, President

Board of Directors:

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