



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
West Coast Region  
1655 Heindon Road  
Arcata, California 95521-4573

MAR 05 2014

In response refer to:  
10012SCR2014AR00056

Matt St. John  
Executive Director  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A,  
Santa Rosa, CA 95403-1072

Michelle Gallagher  
Trinity River Restoration Program  
P.O. Box 1300  
Weaverville, CA 96093

RE: Response to *Comments on Trinity River Channel Rehabilitation Sites: Bucktail (River Mile 105.3--106.35) and Lower Junction City (River Mile 78.8-79.8.) Draft Environmental Assessment/Initial Study; DOI-BLMCA-N060-2014-014-EA and TR-EA0114*

Dear Mr. St. John,

I am writing to express concern of the National Marine Fisheries Service (NMFS) regarding the January 2013 letter (coalition letter) submitted to NCRWQCB and the Trinity River Restoration Program (TRRP) titled *Coalition Letter to Matt St. John and Michelle Gallagher on Bucktail and Lower Junction City Draft EA/IS*. NMFS believes that the letter may be an attempt by the primary author to halt or change the current progress and activities of the TRRP, in favor of those proposed by the main author. The letter relies heavily on the Draft Scientific Advisory Board (SAB) Phase 1 report, for which several TRRP member entities submitted comments that highlighted significant problems with misinterpretation or misuse of data and analyses. Additionally, because information in the coalition letter was misused or taken out of context, NMFS suggests that you read and analyze the coalition letter with caution.

The first bullet in the summary of the draft SAB Phase 1 report in the coalition letter (page 6) is an example of how the main author takes information out of context, and then interprets it to his advantage. He quotes the SAB report as "*The initial rehabilitation projects produced little to no immediate geomorphic response*" (page 3). In this quote, the SAB was referring to the rehabilitation projects that were built in the 1980s and 1990s, before the inception of the TRRP. However, the main author of the coalition letter clearly uses the quote to mislead the reader into



thinking the SAB wrote the sentence referring to the effectiveness of the restoration projects recently built by the TRRP, which is not the case.

NMFS agrees with the comments of the Yurok Tribe regarding the SAB's interpretation of habitat changes over time (1.2%-1.6% per year at base flow). The SAB analysis was over simplified and consisted of measuring bank length with aerial photos in certain years at base flow only, then using bank length as the sole measure of juvenile rearing habitat. Their analysis did not include any flows other than baseflow, which are the flows that much of the habitat restoration projects target, nor did it include any measure of habitat quality, such as proximity to large woody debris. Other TRRP program partners including the U.S. Fish and Wildlife Service submitted similar comments on the draft SAB report. The main author of the coalition letter then seized on these poorly developed figures in the draft SAB report to use as evidence of lack of progress from TRRP.

The names of numerous guide services appear on the coalition letter, and the Trinity River Guide Association submitted a letter to NCRWQCB with comments on the *Bucktail and Lower Junction City Draft EA/IS*. The coalition letter states numerous times that TRRP efforts have not resulted in benefits to salmon and steelhead runs. NMFS notes the contradiction with the Redding Fly Shop, which states on their website that:

*Trinity and Lewiston Dams were completed in the 1960s, but recent restoration efforts along the river (Trinity River Restoration Program) have brought the steelhead back by the thousands, and recent years on the Trinity have boasted some of the finest runs and greatest steelheading in decades.*

The Redding Fly Shop also describes on their website how beneficial to salmon and steelhead the annual Trinity River spring flows are, which are planned and carried out by the TRRP. There are 100 guide licenses available for the Trinity River, and all are currently taken. Guides take their clients to the fish, and the Trinity River would not be such a popular fishery if the guides were not successful. Again, the inconsistencies between what was stated in the coalition letter and trends in salmon and steelhead abundance, as well as fishing popularity on the Trinity River, are substantive enough to give NMFS serious concerns regarding the information in, and purpose of the coalition letter.

On page three of the coalition letter (3<sup>rd</sup> bullet), the main author attempts to make a direct link between 2013 Trinity River fall chinook salmon run size, and a quote in the draft SAB report, which lacks any context. People who understand salmon ecology and west coast salmon fisheries management knows that is difficult, if not impossible, to directly attribute the TRRP habitat restoration to 2013 fall run chinook salmon run size. Without a detailed review of factors like uncertainties in preseason salmon abundance predictions, harvest allocations, ocean conditions, river flows and weather patterns when smolts migrated to the ocean in 2009 and 2010, and changing configurations of the Klamath River mouth, etc., any link to juvenile rearing habitat area and run size is tenuous at best. The coalition letter is rife with examples like these, where arguments lack sound reasoning, or are entirely constructed with misinformation.

The coalition letter states that TRRP should halt mainstem Trinity River restoration work and change the focus to restoration of tributaries. Reclamation is the funding agency of TRRP.

Reclamation has repeated on many occasions their position from the Office of the Solicitor, albeit unwritten, that they do not have the authority to authorize spending for physical restoration work in tributaries. That decision is that of Reclamation's, not TRRP per se. Therefore, efforts by the primary author of the coalition letter at getting TRRP to fund large-scale tributary restoration work are misdirected, regardless of whether he agrees with the position from the Office of the Solicitor. Several TRRP partners including the U.S. Forest Service (USFS), the Bureau of Land Management (BLM), 5-Counties, and Trinity County are currently conducting watershed restoration in Trinity River tributaries. For example, the USFS and BLM shifted their land management strategy as part Northwest Forest Plan from one focused on resource extraction to a multi-use approach. Subsequently, these agencies implemented extensive road maintenance, rehabilitation, and restoration work throughout the larger Trinity River watershed, including its tributaries. The 5-Counties and Weaverville Conservation District have designed and implemented numerous projects to reduce road runoff into streams, add large woody debris, and resize culverts for fish passage.

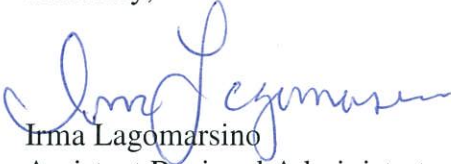
The coalition letter proposes that TRRP wait until two annual 10,000 cfs peak flows have been released from Lewiston Dam before continuing mainstem Trinity River channel rehabilitation. Flow releases of 10,000 cfs or greater typically occur only during an extremely wet water year release which has an 11,000 cfs peak. After updating the water year classifications for the last 102 years, NMFS found 13 extremely wet water years occurred during this period, a 13% occurrence. The extremely wet water years periodically occurred back to back, although there were multiple long periods (up to 23 years) between extremely wet water years. NMFS is concerned that stalling important Trinity River mainstem restoration work for an unspecified period, and for a potentially long amount of time, would have negative consequences for salmon and steelhead in the Trinity River and would further delay much needed habitat improvements. In light of the current Federal budget climate, this could also lead to elimination of funding for the TRRP.

The coalition argues that the current restoration approach for channel rehabilitation sites is not what was envisioned in the Record of Decision (ROD). However, the alternative authorized by the ROD clearly includes a strong adaptive management component to the TRRP, which overtly implies that restoration approaches will change with time as scientists adapt implementation to research and monitoring results and new techniques. Under a strong adaptive management program, change is expected and ideally is planned for in a systematic manner that improves resource management through continual learning. NMFS would be more concerned if the Trinity River restoration approach envisioned in the ROD did not change at all, after more than a decade of implementation, research, public input, and publications in the river restoration field.

The TRRP is an essential component of long-term restoration of the Trinity River, which suffered decades of habitat degradation. Threatened Southern Oregon/Northern California Coasts ESU coho salmon are directly benefitting from TRRP restoration, and NMFS biologists have recorded large quantities of rearing juveniles utilizing recently completed restoration sites. Several habitat monitoring efforts on the Trinity River have measured and documented significant habitat gains at TRRP restoration sites. The TRRP is critically important to recovery of coho salmon, as well as other salmonids that support dependent tribal, commercial, and recreational fisheries, and therefore the TRRP should continue their mainstem restoration work,

while changing and adapting techniques as new information and monitoring data becomes available. In addition, incorporating new information, such as that from the final SAB report, can occur without a disruptive, or possibly catastrophic, break in Trinity River restoration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Irma Lagomarsino". The signature is fluid and cursive, with a large initial "I".

Irma Lagomarsino

Assistant Regional Administrator