



## Trinity River Restoration Program

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July 12, 2019

Mr. Ernest Conant, Regional Director  
Mid-Pacific Region  
U.S. Bureau of Reclamation  
2800 Cottage Way  
Sacramento, CA 95825

**Subject: Request to reimplement diurnal flow variability in the Trinity River, and explore dam infrastructure technologies that reliably implement restoration flow measures**

Dear Mr. Conant,

I am writing on behalf of the Trinity Management Council (TMC) to request that the Bureau of Reclamation (Reclamation) reimplement diurnal flow variability in the Trinity River, and assess infrastructure technologies associated with the Trinity River Division (TRD) of the Central Valley Project that could reliably implement TMC recommended flows according to the 2000 Record of Decision (ROD) for the Trinity River Mainstem Fishery Restoration.

During the winter and spring of 2019, three separate, major infrastructure issues arose which impacted Reclamation's ability to release TMC recommended flows:

- First, delays with the rewind of a turbine at Trinity Power Plant prompted an unprecedented request from the acting Deputy Regional Director Bader to prepare alternative hydrographs that would delay the start of restoration flow releases until after the turbine was repaired, in order to avoid bypassing hydropower production. While this direction was ultimately not implemented, the TMC remains concerned that such infrastructure issues could cause unnecessary delays in the future.
- Then in April, a hydraulic line failed in one of the hollow jet valves at Trinity Dam, resulting in an oil spill on Lewiston Reservoir and Trinity River Hatchery, and delayed our restoration flow release schedule by more than a week.
- Finally, in May, an electric motor associated with a radial gate at Lewiston Dam failed and, in order to minimize risk to the remaining gate, restoration flows were suspended until repairs were completed.

This last issue was most substantial, as the direction that the Trinity River Restoration Program (TRRP) received following the failure and repair was that Reclamation would no longer implement diurnal flow variability because of the frequency of flow adjustments required to

implement this flow pattern. Reclamation directed TRRP staff to develop a new flow schedule without the diurnal flow variability. At the June 19, 2019 TMC meeting, Reclamation's Northern California Area Office staff informed the TMC that Reclamation believes that this type of release schedule causes too much wear on old infrastructure that was not designed for frequent, small adjustments. While the TMC understands that the TRD infrastructure was not designed for frequent and small flow adjustments, advancements in scientific understanding have led TRRP scientists to recommend flow schedules that vary on smaller time scales than previous flow recommendations.

Diurnal flow variability is an important attribute of a natural river system, and its implementation for the last two water years was viewed as a major step forward in our efforts to adaptively manage flows to more effectively use the flow volume specified in the ROD. The TMC believes that full implementation of the ROD, as directed by Congress and Federal Courts, is critically and equally important as operating the TRD. Therefore, we request Reclamation implement the TMC recommended flow schedule with diurnal variability, as originally approved. If Reclamation decides not to implement diurnal variability from the flow schedule, the TMC requests Reclamation provide a policy justification for not following TMC's flow recommendations at our September TMC meeting. In addition, the TMC requests Reclamation provide infrastructure maintenance or improvement options that will allow Reclamation to reliably implement hydrographs developed by Program scientists and recommended by the TMC, and thus meet its obligations under the ROD.

The TMC looks forward to engaging with Reclamation on new infrastructure technologies that will reliably implement fisheries restoration flow objectives. If you have further questions regarding this request, please contact me at (707) 825-5154 or [justin.ly@noaa.gov](mailto:justin.ly@noaa.gov) or the TRRP Acting Executive Director, Mike Dixon, at (530) 623-1811 or [mdixon@usbr.gov](mailto:mdixon@usbr.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Ly", with a long, sweeping underline.

Justin Ly  
Chair, Trinity Management Council