

**4032**

Dear EIS/EIR Team Members:

I support a diversion of no more than 30 percent of the natural water flow from the Trinity River Basin. While I support the science and study that produced the Flow Evaluation Report, the recommendations were limited by an assumption about the amount of water that could be available for the river. Legislation creating the Trinity River Division, and additional legislation clearly gives Trinity fish and wildlife priority over the diversion of any water to the CVP. Therefore, the Preferred Alternative does not go far enough to achieve a legally mandated restoration of the ecosystem.

Thank You,

Name:

Address:

City/State/Zip:

*Roland Mata*  
 2630 E. 221st St.  
 Long Beach, CA 90810

Official Public Comment

**4033**

Dear EIS/EIR Team Members:

I support a diversion of no more than 30 percent of the natural water flow from the Trinity River Basin. While I support the science and study that produced the Flow Evaluation Report, the recommendations were limited by an assumption about the amount of water that could be available for the river. Legislation creating the Trinity River Division, and additional legislation clearly gives Trinity fish and wildlife priority over the diversion of any water to the CVP. Therefore, the Preferred Alternative does not go far enough to achieve a legally mandated restoration of the ecosystem.

Thank You,

Name:

Address:

City/State/Zip:

*Alicia Mata*  
 2630 E. 221st St.  
 Long Beach, CA 90810

Official Public Comment

~~4033~~  
**4034**

Dear EIS/EIR Team Members:

I support a diversion of no more than 30 percent of the natural water flow from the Trinity River Basin. While I support the science and study that produced the Flow Evaluation Report, the recommendations were limited by an assumption about the amount of water that could be available for the river. Legislation creating the Trinity River Division, and additional legislation clearly gives Trinity fish and wildlife priority over the diversion of any water to the CVP. Therefore, the Preferred Alternative does not go far enough to achieve a legally mandated restoration of the ecosystem.

Thank You,

Name:

Address:

City/State/Zip:

*Matthew Mata*  
 2630 E. 221st St.  
 Long Beach, CA 90810

**Postcards from Roland Mata, Alicia Mata, and Matthew Mata**

- 4032-1 Please see thematic responses titled "Fisheries."
- 4033-1 Please see thematic responses titled "Fisheries."
- 4034-1 Please see thematic responses titled "Fisheries."

Postcards from Clarissa Mata and Adel Vita

**4035**

*Official Public Comment*

**Dear EIS/EIR Team Members:**

I support a diversion of no more than 30 percent of the natural water flow from the Trinity River Basin. While I support the science and study that produced the Flow Evaluation Report, the recommendations were limited by an assumption about the amount of water that could be available for the river. Legislation creating the Trinity River Division, and additional legislation clearly gives Trinity fish and wildlife priority over the diversion of any water to the CVP. Therefore, the Preferred Alternative does not go far enough to achieve a legally mandated restoration of the ecosystem.

Thank You,

Name: Clarissa Mata  
 Address: 2630 E. 221st St.  
 City/State/Zip: Long Beach, CA 90810

4035-1 Please see thematic responses titled "Fisheries."

4036-1 Please see thematic responses titled "Fisheries."

**4036**

*Official Public Comment*

**Dear EIS/EIR Team Members:**

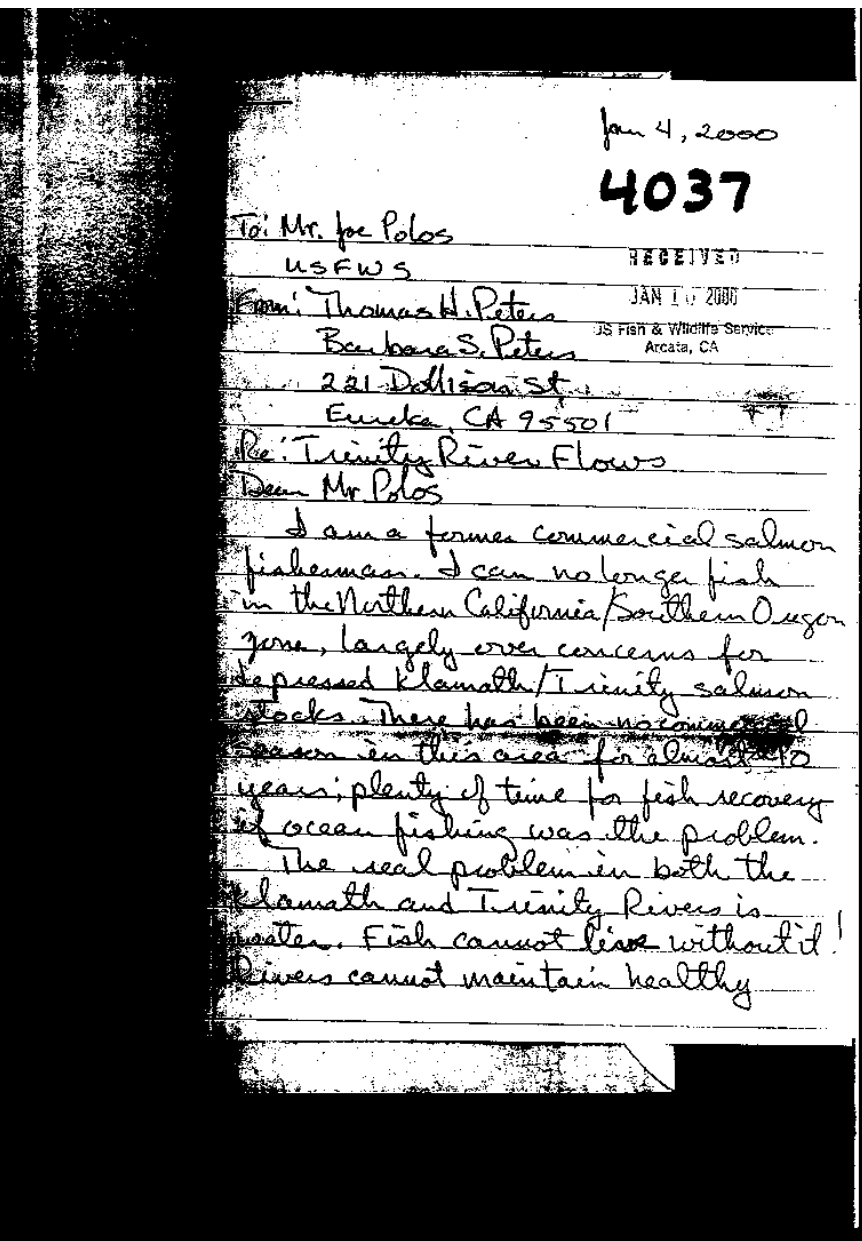
I support a diversion of no more than 30 percent of the natural water flow from the Trinity River Basin. While I support the science and study that produced the Flow Evaluation Report, the recommendations were limited by an assumption about the amount of water that could be available for the river. Legislation creating the Trinity River Division, and additional legislation clearly gives Trinity fish and wildlife priority over the diversion of any water to the CVP. Therefore, the Preferred Alternative does not go far enough to achieve a legally mandated restoration of the ecosystem.

Thank You,

Name: Adel Vita  
 Address: 13629 Lakeland Rd  
 City/State/Zip: Whittier, CA 90005



Letter from Thomas H. and Barbara S. Peters Dated January 4, 2000



Jan 4, 2000  
**4037**

To: Mr. Joe Polos  
 USFWS

RECEIVED

From: Thomas H. Peters  
 Barbara S. Peters  
 221 Doherty St.  
 Eureka, CA 95501

JAN 10 2000  
 US Fish & Wildlife Service  
 Arcata, CA

Re: Trinity River Flows  
 Dear Mr. Polos

I am a former commercial salmon fisherman. I can no longer fish in the Northern California/Southern Oregon zone, largely over concerns for depressed Klamath/Trinity salmon stocks. There has been no commercial salmon in this area for almost 40 years; plenty of time for fish recovery if ocean fishing was the problem.

The real problem in both the Klamath and Trinity Rivers is water. Fish cannot live without it! Rivers cannot maintain healthy

## Letter from Thomas H. and Barbara S. Peters continued

4037-1 Please see thematic responses titled "Fisheries."

T.H. Peters

habitat without it. When the dams were built on the Trinity, many assurances were given that plenty of water would be retained for fish. Lost spawning area would be replaced with a hatchery. These both proved to be lies. The hatchery, while useful, has never produced what the vast spawning area behind the dams could have. But far worse was the diversion of up to 80% of the Trinity River to the San Joaquin Valley to grow unnecessary and often price-supported crops. This diversion was illegal but, until now, apparently unstopable. The Trinity River, to be healthy, needs at least 70% of its historic flows. I most strongly support restoring these flows, as originally provided for in law.

4037-1

## Letter from Thomas H. and Barbara S. Peters continued

T.H. Peters

3

I have heard complaints from Central Valley water users about the cost of "wasting" this water by letting it flow to the ocean. However, I rarely hear about decades of lost salmon harvest, both by ocean fishermen and Native Americans. I rarely hear about the collapse of the coastal salmon fishery, the lost jobs, and the lost incomes to coastal communities. These can only be restored with healthy rivers and these can only be had by allowing water to flow.

You might survive pretty well on 70% of the water you now use. I don't think you'd be very healthy on only 43%.

The Trinity River is the same way.

Please restore the Trinity. Restore the 70% flow.

Thank you  
Thomas H. Peters

} 4037-1  
cont'd

4038

January 7, 1999

Mr. Joe Polos  
 US Fish and Wildlife Service  
 1655 Heindon Road  
 Arcata, California 95521

Dear Mr. Polos:

The following are my comments on the October 1999 public draft of the Trinity River Mainstem Fishery Restoration Environmental Impact Statement/Report. Thank you for the opportunity to comment.

I have been a resident of Humboldt County twice, first in 1953-1955, and again since 1992. I have extensive experience kayaking on the Trinity River in the section affected by releases from the Lewiston dam. I've started kayaking in California in 1975 on the North Fork of the Feather River, and I watched PGE take away that water, to the detriment of both fish and kayakers.

I also have extensive experience fishing for trout in northern California streams and rivers, and lots of other rivers in the western US. I've been doing that since 1955. I've been doing less fishing lately because there aren't enough fish in California and I don't want to take fish that are needed to make more fish.

In order to have more fish, the river needs more water. More water is better for kayaking. The 300 cfs release given in Table 3-32 is not enough water for kayaking, and it's definitely not enough water for fish. The table says that 300 cfs under the no action alternative is not a constraint for kayaking. I disagree. It's not enough water to do the runs safely because if you fall over, the rocks are shallow and you can hurt yourself trying to roll. Some of the rapids are difficult to run at low water because there's not enough water to get around the rocks without hitting them.

The preferred alternative would only allow 50% of the natural inflow to be retained in the river. Full restoration of the fish requires that all the water be left in the river. If the law requires that some of the Trinity water has to be diverted, then the full amount that is supposed to be left in the river should remain in the river, not diverted into the Central Valley. The Trinity River should get at least as much water as the current law allows but if restoration of fish populations is the goal, then it should get all the water needed for that restoration.

The impact analyses, particularly the cumulative impact analysis, should be interdisciplinary as required under NEPA and CEQA, not multidisciplinary. Multidisciplinary analyses do not compare unlike quantities such as fish production and value to the Hupa, Yurok and other residents of Trinity and Humboldt counties to agricultural production and economic value to Central Valley ranchers because the writers generally write only about their discipline or field of expertise. Thus, the value

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US Fish & Wildlife Service  
 Arcata, CA

Letter from Rick Dimick Dated January 7, 2000

- 4038-1 Regarding the preferred threshold flows for white-water activities, please see Response 410-3, as well as Chapter 2 of the FEIS/EIR, Changes to the DEIS/EIR.
- 4038-2 Please see thematic responses titled "Fisheries."
- 4038-3 The DEIS/EIR discloses potential impacts within a number of dissimilar issue and resource areas. As the commentor points out, a direct comparison across each of these issue areas is not feasible, given the difference in the analysis approach used for each issue area, as well as the units of comparison. Accordingly, potential beneficial and adverse impacts are summarized in the context of each issue area; no direct comparison is made. However, some readers may choose to interpret the results on a dollar-for-dollar basis. The "spiritual" value of the fishery is discussed extensively in Section 3.6 Tribal Trust, and the commercial value, as well as recreational economic values associated with the fishery, are addressed in Sections 3.5 Fishery Resources, 3.8 Recreation, and 3.11 Socioeconomics.

4038-1

4038-2

4038-3

Letter from Rick Dimick continued

of fish is never compared to agricultural production except in dollar amounts. The value of fish includes both spiritual value to the Hupa and Yurok people, economic value as a merchantable commodity, and value as a recreational opportunity. The value of anadromous fish production in the Trinity River will never meet the value of agricultural production in the Central Valley if the impact analysis is based solely on monetary value of fish versus agricultural products.

4038-3  
cont'd

The EIS needs to describe the context in which the conclusion is made in the impact analysis that Sacramento River winter run chinook are harmed by not getting Trinity River water because Sacramento River water temperatures will increase without Trinity River water. Holding one endangered species hostage to another listed species indicates that there is a serious problem with the interbasin water transfer system in California. The salmon in the Trinity River are proportionately more valuable to the economies of Trinity and Humboldt counties, and to the Hupa Valley and Yurok tribes, than the Sacramento River chinook are to the economies of the counties in the Central Valley, and the cumulative impact analysis needs to specify the context in which comparisons are made and to compare the intensity of the impacts on the residents of Trinity County versus the intensity of the impact on the Central Valley water users.

4038-4

I disagree with the adequacy of the impact analysis that assigns an adverse effect to Central Valley residents from land subsidence and upwelling due to increased pumping of groundwater. The proportional adverse impacts on the residents of Trinity and Humboldt counties, especially the Hupa Valley and Yurok people, from loss of Trinity River water and resulting loss of fish production are significantly greater than the adverse effects on residents of the Central Valley from ground subsidence. The impact analysis needs to specify the context on which the analyses are based and the intensity of the effects on local river users versus distant recipients of the water.

4038-5

I disagree with the conclusion in Section 4.3, Irreversible and Irrecoverable Commitments of Resources and Unavoidable Significant Impacts that increased recreational opportunities would require increased energy use for transporting the recreationists. If the Trinity River does not have sufficient water to engage in either recreational fishing or whitewater boating, the fishermen and whitewater boaters who are reside in Humboldt and Trinity counties will travel much farther distances for these recreational opportunities. This is proportionately greater effect on these local users than on Central Valley and Bay Area residents who choose to travel a substantial distance to recreate on the Trinity River.

4038-6

In my experience, high water is not a problem for fish, and high flows are self-limiting for kayakers. But low flows are a real problem for fish because of increased temperatures. Dams could be used to increase the flexibility of releases to a river when the water is needed, but in the case of the Trinity, the flexibility has been taken away because of demands of large-scale agriculture in the Central Valley. The Trinity needs a minimum amount of water for the fish to even survive. Restoration of the natural production of Trinity River fish needs more than a minimum amount of water, and the water needs to be delivered when the fish need it, not when a San Joaquin valley rancher

4038-7

4038-4

The DEIS/EIR provides an objective disclosure of the anticipated beneficial and adverse impacts of each alternative. Just as the beneficial and adverse impacts of increased flows were projected with regard to fish production, recreation, tribal trust, and other issue areas within the Trinity River Basin, the potential effect on Central Valley resources were also assessed as required by NEPA and CEQA. With regard to federally and state-listed winter salmon, the CVP is currently operated in accordance with the CVP OCAP to meet the provisions of the Biological Opinion (BO) addressing winter salmon. CEQA, in particular, requires that impacts to listed species be analyzed; impacts to listed species are considered significant and accordingly identified as such on page 3-173 of the DEIS/EIR. Given the winter-run BO specifies a temperature compliance requirement as well as Shasta carryover storage requirement, each alternative that would result in decreased exports was analyzed using Reclamation's Sacramento River Water Temperature Model, as described on page 3-172 of the DEIS/EIR. Differences in estimated modeled mortalities of greater than 2 percent compared to the No Action Alternative were identified as significant.

4038-5

Please see Responses 4038-3 and 4038-4. Potential impacts to groundwater resources are based on models and assumptions identified in Section 3.3.2 Groundwater and are primarily a result of an assumed increase in groundwater use associated with the decreased availability of CVP surface-water supplies. Again, no comparison across issue areas is made given the inherent differences between each of the issue areas, resources, and communities.

4038-6

Thank you for your comment. Comment noted.

4038-7

Regarding fisheries restoration, please see thematic responses titled "Fisheries." Regarding tribal trust, please see thematic response titled "Tribal Trust."

Letter from Rick Dimick continued

4038-8 Comment noted. Please see related responses above.

needs to grow cotton or tomatoes. The fish, and the Hupa and Yurok people, who depend on the fish for their traditions, have suffered proportionately more than the Central Valley ranchers have suffered. The EIS/R needs to reflect this in a discussion of the context in which impacts are analyzed.

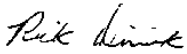
}  
4038-7  
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It is ironic that Trinity County must bear the administrative costs of preparing a Statement of Overriding Considerations (SOC) for the preferred alternative for potentially significant and unavoidable adverse impacts to groundwater levels in Central Valley counties. It is more ironic that Trinity County should bear the costs to prepare an SOC for adverse effects on Sacramento River chinook from violation of water temperature objectives when the native fish stocks of Trinity County are suffering because of water diverted out of the county. Trinity County should sue to recover those costs from the beneficiaries of the Trinity River water diversions.

In summary, restoration of the Trinity River anadromous fishery requires more water in the river and less water diverted out of the river. The 300 cfs flow identified as a preferred level for whitewater kayaking is too low; at least 450 is required and I prefer at least 1200 cfs. The Trinity River should get at least as much water as the law specifies – that would be as much water as is needed to restore full natural production of anadromous fish.

}  
4038-8

Sincerely,



Rick Dimick  
1515 Airport Road  
McKinleyville, CA 95519



Letter from George Strauss Dated January 3, 2000

4039

1468 Grizzly Peak  
Berkeley, California 94708

January 3, 2000

Mr. Joe Polos  
US Fish and Wildlife Service  
1125 16th Street, Room 209  
Arcata, CA 95521

Dear Mr. Polos:

This is to urge that plans for Trinity River Basin allow not more than thirty percent of the natural flow to be diverted. The recommendations of the Flow Evaluation Report were based on the assumption that diversions would be greater than this. But legislation clearly gives Trinity fish and wildlife priority over diversion to CVP. Given this, the Preferred Alternative does not go far enough to achieve the legislated mandated restoration of the ecosystem.

Sincerely

*George Strauss*  
George Strauss

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Arcata, CA

4039-1 Please see thematic responses titled "Fisheries."

4039-1

4039-1  
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US Fish & Wildlife Service  
Arcata, CA

January 7, 1999

Mr. Joe Polos  
US Fish and Wildlife Service  
1655 Heindon Road  
Arcata, California 95521

Dear Mr. Polos:

Thank you for the opportunity to comment on the public draft of the Trinity River Mainstem Fishery Restoration environmental impact statement/report (EIS/R).

I support the concept of increased flows into the Trinity River for the purpose of restoring the anadromous fishery. However, the river should receive at least as much water as was directed by the original legislation authorizing the Trinity River Division dams, or about 70% of the natural inflow. 50 % of the water, which would be retained in the river under the preferred alternative, is not sufficient for restoration of natural conditions suitable for salmon production at the levels that existed prior to dam construction.

4040-1

The legislation authorizing construction of the TRD allowed that water excess to the needs of the fish and wildlife could be diverted for agriculture. If the purpose and need for the action is full restoration of the fishery that existed prior to the TRD diversions, the EIS should contain an alternative that addresses ways to fully restore the fishery.

4040-2

The EIS should include an alternative that describes the effects of diverting only excess water, rather than considering alternatives that address the minimum volume of water needed to maintain or restore a portion of the original fishery. Diversion of excess water versus retention of a minimum volume of water are two different analyses, because of the differences in statistical inferences that result from Type I and Type II errors. In this case, the probability of losing the anadromous fishery in the Trinity River because of inadequate flows should be analyzed as an alternative, in addition to alternatives that analyze the probability of restoring the anadromous fishery by increasing the flows.

Full restoration of the fishery requires that an alternative for removal of the dams be considered, because that is the baseline condition that existed prior to the dams. Although such an alternative would require new legislation for dam removal, such an alternative is feasible because legislation for removal of the dam is equally as feasible as legislation for dam construction.

These are reasonable alternatives under NEPA because they meet the purpose and need of the project. The preferred alternative (increased flows under the flow evaluation study flow regime plus mechanical restoration) meets the purpose and need for the action of restoring the anadromous fishery only if restoration of 66% of the fishery is considered acceptable. The Bureau of Reclamation should provide the data through which the decision was made that partial restoration of the fishery is considered acceptable and that alternatives that could provide full restoration are beyond the scope of the project.

4040-3

The clear basis for choice by decision-makers and the public required under the CEQ regulations for implementing NEPA is diminished by rejection of a dam removal alternative on the basis that it does not fulfill legislative requirements based on the original legislation authorizing the TRD.

Letter from Aida Parkinson Dated January 7, 2000

- 4040-1 Please see thematic responses titled "Fisheries."
- 4040-2 Please see thematic response titled "No Action Alternative/Existing Conditions Scenario and Range of Alternatives."
- 4040-3 Regarding dam removal, please see Response 1389-4. Please also see thematic responses titled "No Action Alternative/Existing Conditions Scenario and Range of Alternatives" and "Purpose and Need for Action."

**Letter from Aida Parkinson continued**

NEPA requires that the range of alternatives include alternatives that are outside the jurisdiction of the lead agency and that alternatives be considered even if the economic cost of implementing the alternative is considered beyond the means of the agency proposing the action.

It is scientifically feasible to remove the dam for the purposes of fishery restoration, as has been demonstrated in the removal of the Glines Canyon and Elwah dams on the Olympic Peninsula in Washington.

Political costs such as the demand for increased water for agricultural and residential development of the Central Valley are not acceptable reasons for rejecting an alternative without full consideration in an EIS.

The remainder of my comments address the analysis of the recreational potential of whitewater boating on the river.

I am a native Californian from the central valley for several generations back, and have lived in Humboldt County since 1992. I have been whitewater kayaking since 1987. I have kayaked an average of 100 days per year since 1994, and have kayaked an average of about 30 days per year on the Trinity River since 1994. I have kayaked all three primary whitewater runs on the mainstem of the Trinity. These runs are Pigeon Point, Hayden-Cedar, and Burnt Ranch Gorge, ranging in difficulty from beginner to advanced/expert. I have kayaked the mainstem of the Trinity at flows ranging from 300 to about 18,000 cfs.

Table 3-33 describes 300 cfs as a minimum preferred flow. This is inaccurate. 300 cfs is too low for all three whitewater runs. The quality of the whitewater experience is severely diminished at low flows, some sections of the river are too shallow to float a boat at 300 cfs, and some routes through rapids are not available at 300 cfs. Safety is compromised at low flows because of the potential hazard from exposed rocks or shallow rocks and inadequate depth for completing an eskimo roll. Foot entrapment hazards are greater at low flows. Rafts and open canoes are unable to float at this low flow altogether.

I estimate that I regularly boat with about 50 people from the Chico, Redding, and Arcata areas, and none of these boaters prefer 300 cfs. 300 cfs is a minimum boatable flow but about 450 cfs should be given as a minimum boatable flow and about 750 cfs as the preferred minimum flow.

More water in the river would improve the quality of the whitewater experience. Increased flows are particularly valuable for whitewater kayaking during the critically dry and dry years when other regional rivers do not have sufficient water for river running.

More water in the Trinity River is better for kayakers, and far better for the fish.

Thank you for the opportunity for comment on this proposal.



Aida Parkinson  
1515 Airport Road  
McKinleyville, CA 95519

4040-4 Regarding the preferred threshold flows for white-water activities, please see Response 410-3, as well as Chapter 2 of the FEIS/EIR, Changes to the DEIS/EIR.

4040-3  
cont'd

4040-4

Letter from Joseph M. Thornhill, Attorney at Law, Dated January 3, 2000

4041

JOSEPH M. THORNHILL

ATTORNEY AT LAW  
FORTY FOUR MONTGOMERY STREET  
SUITE 1000  
SAN FRANCISCO, CALIFORNIA 94104-4612

FACSIMILE: (415) 226-1854

TELEPHONE: (415) 946-1336

January 3, 2000

Mr. Joe Polos  
U.S. Fish and Wildlife Service  
1125 16th Street, Room 209  
Arcata, CA 95521

Dear Mr. Polos:

I hereby submit the following comments on the draft Environmental Impact Statement/Report relating to the Trinity River flow necessary to implement the congressional objective of restoring fish and wildlife population levels to those which existed immediately prior to construction of the dams authorized by the Trinity River Act of 1955.

I strongly urge the adoption of the Maximum Flow Alternative contained in the report. This alternative comes closest to carrying out the Congressional intent, and does not require the level of re-engineering of river channels that would be required by the alternative recommended by the draft. It would provide important and substantial benefits to the general public in terms of the enhanced recreational opportunities that would be provided. This, in turn, would provide enhanced economic opportunities for the residents of the Trinity River area. The next century will see unprecedented population growth in California. While this is also an argument for devoting water to agricultural purposes, that argument is much weaker. The increasing food needs of California's population can and will be addressed in such ways as technological advances and imports, but the equally genuine need for recreational opportunities for that population cannot be addressed by such alternatives. Conservation and restoration of natural conditions is necessary to preserve one of the most scenic and beautiful locations on Earth. The Maximum Flow Alternative is the best choice available, and it should be adopted without further delay.

Thank you very much for taking my comments into account.

Very truly yours,

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JAN 10 2000

US Fish & Wildlife Service  
Arcata, CA

4041-1 Thank you for your comment. Your comment has been noted. No response is required.

} 4041  
} 4041  
cont'd

Letter from Robert S. Nicksin, Esq. Dated January 4, 2000

4042-1 Thank you for your comment. Your comment has been noted. No response is required.

4042

**ROBERT S. NICKSIN, ESQ.**  
5740 ETIWANDA AVENUE #1  
TARZANA, CA 91356  
TELEPHONE: 818-996-2309

January 4, 2000

Mr. Joe Polos  
U.S. Fish and Wildlife Service  
1125 16th Street, Room 209  
Arcata, CA 95521

Dear Mr. Polos:

I believe it is time for the federal government to take clear and decisive action to improve conditions on the Trinity River. The best hope for the Trinity River is through the Maximum Flow Alternative regime. This program will allow for a more natural recovery and will provide for 81% recovery of the fishery, the most of any alternative considered. } 4042-1

It is also essential that your decision not be further delayed by those whose only goal is to paralyze progress. There have been thirty-five years of delay, it is now time to begin the process of rebuilding the Trinity River ecosystem.

It is increasingly clear in California that our natural resources are more valuable – both to our economy and our citizens – when they are not treated as a mere commodity. Our waterways and other natural resources are part of the fabric of this great state, and must be preserved and enhanced for future generations.

Sincerely,



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JAN 10 2000  
US Fish & Wildlife Service  
Arcata, CA

**Letter from Salmon and Steelhead Recovery Coalition  
Dated January 4, 2000**

Duplicate of Letter 3875. Please see Letter 3875 and associated responses.

**SALMON AND STEELHEAD RECOVERY COALITION**  
California Council Trout Unlimited, California Trout, Inc., Coast Action Group,  
Environmental Protection Information Center, Northcoast Environmental Center,  
Northern California Association of River Guides,  
Pacific Coast Federation of Fishermen's Associations,  
Salmonid Restoration Federation, Smith River Alliance

Respond to: Jud Ellinwood, Coordinator

1426 8th St., Eureka, CA 95501 • (phone and fax) 707-444-8903 • (e-mail) jud@northcoast.com

January 4, 2000

Mr. Joe C. Polos  
U.S. Fish & Wildlife Services  
1125 16th Street, Room 209  
Arcata, CA 95521

**RE: Trinity River Mainstem Fishery Restoration Environmental Impact  
Statement/Report (EIS/R).**

Dear Mr. Polos:

Please accept these comments of the Salmon and Steelhead Recovery Coalition (SSRC) on the Trinity River Mainstem Fishery Restoration EIS/R.

We strongly support the full restoration of the Trinity River in Northern California, and urge immediate implementation of the Maximum Flow Alternative. At the very minimum, the Department of Interior should establish a flow regime that allows the Trinity to keep at least 70 percent of its annual watershed runoff in the river. This is the minimum that should be considered acceptable considering the lengthy legislative history of the Trinity River Division (TRD) and its unique position within the Central Valley Project. Clearly, the fish and wildlife of the basin have priority over the diversion of any water from the basin.

The draft indicates that the Maximum Flow Alternative could restore the fisheries to 81 percent of the pre-dam levels. While that is still unacceptable considering the clear mandate to maintain the preservation and natural propagation of the fish and wildlife in the basin, this is the best of the various alternatives. The only true way to fully restore the fisheries would be to remove the dam. It is unfortunate for the river that this alternative was not considered. Had it been, this would clearly be the best option for the river.

The Preferred Alternative can only restore the fishery to 66 percent of the pre-dam levels. This is inadequate. This option compromises the fisheries in an attempt to lessen the impacts to the water users and others that have benefited from the excess diversions for the last three and a half decades. The Preferred Alternative is too reliant on mechanical restoration to make up for low flows. We should not depend on bulldozers to do what we know increased flows accomplish. These mechanical restoration techniques are unproven, unreliable, and costly. We can not count on continued funding to keep up with the mechanical restoration program.

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US Fish & Wildlife Service  
Arcata, CA

## Letter from Salmon and Steelhead Recovery Coalition continued

The goal of the draft and the entire restoration program is to restore the fishery. The Preferred Alternative seems to have as its goal minimizing impacts to water users at the cost of a fully restored fishery. SSRC supports full recovery of the Trinity River as mandated by existing law. The Preferred Alternative will not meet this goal.

The Adaptive Management component of both the Preferred Alternative and the Maximum Flow Alternative is far too vague. While Adaptive Management holds promise it is not clearly defined in the document. Pages 2-16 and 2-17 state that a Trinity management council composed of fisheries agency representatives would serve as a policy group to review, modify, accept, or remand recommendations made by a technical modeling and analysis team. However, the draft does not specify which fishery agencies will be involved, or who will make up the technical modeling and analysis team. Also, the draft does not specify in what capacity the stakeholders' group, the scientific advisory board, or the external peer reviewers would operate. Before we can accept or reject any adaptive management process, we must know specifically how the program will be operated, by whom, in what capacity, and who will choose the various representatives.

Including a stakeholders' group that is comprised of those who directly benefit from diverting water from the Trinity is an invitation to compromise the entire process. The decisions made regarding flows and timing of releases should be done in accordance with the needs of the various fish species in the Trinity, not the convenience or needs of the water and power users. We support the formation of an independent peer review panel made up of scientists separate from any group that benefits from dam operations. This panel could then serve as the policy group to review, modify, accept, or remand procedures.

Funding for the relocation of the roads, homes and bridges that would be inundated by higher flows, as well as the necessary alterations to Trinity Dam, should be secured and laid out in the final draft. The Adaptive Management component is heavily reliant on examining the effects of the higher flows on the fluvial geomorphology of the basin and accompanying changes in fish numbers. The Federal Government, not Trinity County, should fund these projects.

The final Record of Decision should call for the implementation of the Maximum Flow Alternative combined with the Watershed Protection element of the Mechanical Restoration Alternative. Road decommissioning, rehabilitation, and maintenance are vital to reducing sediment and complying with the President's Forest Plan and Option 9. It is vital, should the ROD decision not fulfill the mandate to preserve and propagate the fish and wildlife populations in the basin, that other steps be taken to increase flows or study removal of the dam. While we can be certain that constructing Trinity Dam and diverting most of the basin water contributed to the rapid decline in natural fish stocks, we can not be so certain that the methods described in the document can fulfill on the promises to restore the populations. We must ensure that the Secretary is given the necessary authority to take measures to further improve the condition of the fish and wildlife.

The people, fish and wildlife in the Trinity Basin have suffered for the past 36 years while the taxpayer subsidized agri-business in the Central and San Joaquin Valley have grown rich from the excess diversions. Now the coho are listed as an endangered species and the steelhead are a

Letter from Salmon and Steelhead Recovery Coalition continued

candidate for listing. The flow decision process was mandated to have been completed by December 1996; however delay after delay has ensured that the excess diversion continued while fish numbers suffered. Now those who have benefited from the near-collapse of the Trinity River ecosystem are asking for more delays. This process has been underway since the early 1980's, and the issues raised in the document are not new. We would ask that the current timeline be enforced and a Record of Decision be issued in the spring. The time given for public comment has already been lengthened, and any additional delays will only further impair the fisheries. No more delays!

Sincerely,



Jud Ellinwood, Coordinator

for

Zeke Grader, Executive Director  
Pacific Coast Federation of Fishermen's Associations

Tom Weseloh, Northern California Manager  
California Trout, Inc.

Tim McKay, Director  
Northcoast Environmental Center

Kevin Bundy  
Environmental Protection Information Center

Craig Bell  
Northern California Association of River Guides and  
Boaters

Associations Group

Larry Moss, Executive Director  
Smith River Alliance

Den Doble, Northern California President  
Trout Unlimited of California



Letter from William C. Landreth Dated January 3, 2000

4044-1 Thank you for your comment. Your comment has been noted. No response is required.

4044

January 3, 2000

Mr. Joe Potos  
U.S. Fish and Wildlife Service  
1125 16<sup>th</sup> Street, Room 209  
Arcata, California 95521

Dear Mr. Potos,

I am writing in regard to the Trinity River and your pending decision on water flow. My family has been in California since the 1850's, and we regard our rivers as a precious and undervalued resource. The Trinity is a special river to us, as my great great grandfather was a sheriff in Weaverville in 1874 and generations since have fished in the area. While I recognize the difficulty of decisions like yours, it really is time to give due weight to the importance of having rivers like the Trinity run at maximum flow to restore the habitat. There should be a natural recovery of the fishery, and you should make this decision this year. I want to be able to take my children to see one of California's great streams the way it should be. I trust you will make the right decision. Thank you for your consideration.

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Sincerely

*William C. Landreth*  
William C. Landreth  
5458 Quail Meadows Drive  
Carmel, California 93923

RECEIVED

JAN 10 2000

US Fish & Wildlife Service  
Arcata, CA