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ENVIRONMENTAL DEFENSE
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Memorandum

To: Trinity River Adaptive Management Workgroup

From: Spreck Rosekrans 

Date: November 21, 2005

Re: Forecast methodology for Trinity River year type

Under current policy, less water will be released to the Trinity River from Lewiston Dam than was intended by the Trinity River Mainstem Fishery River EIS/EIR and the Trinity River Flow Evaluation Study. The reason is that Appendix C of the Implementation Plan for the Preferred Alternative, departing from the clear intentions of these studies, includes language specifying that a 90 percent probability of exceedance (i.e. a conservative hydrologic forecast) be used to determine Trinity River year type. I ask that the TAMWG support modification of the provision that specifies a conservative forecast be used in order to correct this discrepancy. I have provided a proposed resolution that, if passed, would indicate such support.

It is my understanding that the Department of the Interior has acknowledged this discrepancy and hopes to resolve it. I hope the TAMWG will encourage them in this regard.

Thank you for your consideration of this resolution.

Whereas restoration of the Trinity River is dependent on reliable flows to support sustainable populations of anadromous fish, to assist in their outmigration and escapement, and to maintain a healthy river channel conducive to spawning, and

Whereas the Trinity River Flow Evaluation Study recommended a schedule of releases to the Trinity River from Lewiston Dam in accordance with five "Year Types", "Extremely Wet", "Wet", "Normal", "Dry" and "Critically Dry", based on the Trinity River's natural hydrology, and

Whereas the Trinity River Mainstem Fishery Restoration EIS/EIR analyzed the effects of the Trinity River Flow Evaluation Study in accordance with the National Environmental Policy Act, using a frequency of year types that would occur under a repetition of historic natural hydrology, and

Whereas the Trinity River Mainstem Fishery Restoration EIS/EIR adopted the flow schedule of the Trinity River Flow Evaluation Study as its Preferred Alternative, and

Whereas the Trinity River Mainstem Fishery Restoration EIS/EIR Appendix C Implementation Plan for the Preferred Alternative inserted the requirement of 90 percent probability of exceedance, which departed from the historic hydrology analyzed in the document, and

Whereas the Record of Decision for the Trinity River Mainstem Fishery Restoration EIS/EIR determines year type on April 1 of each year based on a prediction of expected natural inflow through September 30 of each year, and

Whereas expected natural inflow made on April 1 of each year by the National Weather Service and California Department of Water Resources is best estimated using the 50% inflow exceedance, and

Whereas implementation of Trinity River flows as defined by the Implementation Plan referenced in the Record of Decision would very likely result in a lower level of flows to protect and restore anadromous fish,

including both a reduced frequency of flows assigned to years classified as "Wet" or "Extremely Wet" and an increased frequency of flows assigned to years classified as "Dry" or "Critically Dry",

Whereas the use of the 90% inflow exceedance forecast would contradict the intent and analysis in both the Trinity River Flow Evaluation Study and the Trinity River Restoration EIS/EIR, and impair or inhibit restoration of the Trinity River fishery,

Therefore be it resolved that the United States Department of the Interior should modify the 90% exceedance criteria for determining year type as defined in the Record of Decision for the Trinity River Mainstem Fishery Restoration Plan and replace it with the 50% exceedance criteria that would reproduce the expected frequency of each year type as defined by the Trinity River Flow Evaluation Study and the Trinity River Mainstem Fishery Restoration EIS/EIR as closely as possible to fully achieve the objectives of the Trinity River Flow Evaluation Study.