

October 22, 2012

Elizabeth Hadley, Chair
Trinity Adaptive Management Working Group
P.O. Box 1300
Weaverville, CA

Subject: Minority opinion on TAMWG FY 2013 Budget Recommendation to TMC

Dear Elizabeth;

We strongly support a science-based Trinity River Restoration Program (TRRP) that complies with the 2000 Trinity River Record of Decision. We strongly support the goals of the TRRP and believe that the Trinity River still has the opportunity to be a national model for restoration of an aquatic ecosystem that supports robust sport, tribal and commercial fisheries.

We submit you this minority opinion regarding our abstention from the October 17, 2012 recommendation of the Trinity Adaptive Management Working Group (TAMWG) to the Trinity Management Council in support of the funding priorities as presented in the proposed FY 13 budget.

We do not object to the two caveats that funding be increased for watersheds or that the SAB review the efficacy of the Lower Trinity River sport harvest survey. Instead, we have the following concerns with the funding priorities in the proposed FY 13 budget:

- We object to the inclusion of funding for additional channel rehabilitation projects without having the benefit of the long-delayed Phase 1 review being conducted by the Science Advisory Board. Based on the schedule the TAMWG was provided, final design team meetings with the public will be convened prior to receipt of the final Phase 1 report. The budget priorities blindly assume the outcome of the Phase 1 Review. The ROD called for a review of Phase 1 projects following their completion. This has yet to be completed, but millions are planned to be spent in the face of scientific uncertainty and public concern.
- We object to plans to perform additional gravel injections into the Trinity River without the benefit of independent scientific review of past projects. Given the large number of complaints from the public that numerous pools in the Trinity River have been filled with spawning gravel, it behooves the TRRP to investigate and substantiate the concerns before proceeding. To date we have not seen any analysis of how much the pools have filled, even though it was promised months ago. To the best of our knowledge, the Phase 1 review does not address the biological benefits and impacts of gravel injection, nor is there an intention to do so. Despite the fact that no FY 2012 funds are being

- provided for this project, we object to gravel injection in 2013 as part of the overall TRRP funding priorities.
- We object to the chronic underfunding of watershed restoration. There is, in part, inadequate funding for watershed planning and restoration because the TMC failed to approve the Watershed Assessment Project in FY 2012. Failure to approve the project resulted in a semi-permanent reduction in watershed funding due to continuing federal budget resolutions. The watershed component of the Trinity ROD was intended to provide \$1.8 million/year of funding in all areas of the Trinity River basin, but has been chronically underfunded due to a bias against work outside of the upper 40 miles of the Trinity River.

In conclusion, we do not believe that the TRRP is proceeding in compliance with the 2000 Trinity ROD. Watershed restoration activities to reduce fine sediment inputs into the Trinity River are long-neglected and chronically underfunded. Mainstem restoration projects and gravel injections are being planned to be constructed without the benefit of independent scientific review in the face of increasing public scrutiny and skepticism.

That being said, we believe that the large fish runs being experienced this year are a direct result of the higher flows that have been implemented in recent years by the Trinity River Restoration Program. Furthermore, the supplemental flows provided to the Lower Klamath River in August and September of this year were important pieces in protecting the large salmon returns moving up the river at that time. We strongly support those higher flows and the involvement of the TRRP to ensure that the water is wisely used to meet the fishery restoration goals mandated by Congress.

Sincerely,

Emelia Berol & Tom Stokely
TAMWG Members

Unique program nationally- support and funding from DC;