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June 15, 2021

Winter Flow Scoping
c/o TRRP
PO Box 1300
Weaverville, CA 96093

RE: Comments of American Whitewater on Winter Flow Project Proposal

To the Trinity River Restoration Program,

American Whitewater respectfully submits these comments on the Winter Flow Project Proposal.

Background and Interest

American Whitewater is a national non-profit 501 (c)(3) river conservation organization founded in 1954 with over 6,000 members and 100 locally based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. A significant percentage of our members reside in and travel to California for its whitewater resources. This includes travel to whitewater boating resources on the Trinity River found on the boating reaches of Pigeon Point, Big Flat to Hayden Flat and Hayden to Cedar Flat. Additionally, our California affiliate clubs Gold Country Paddlers and Loma Prieta Paddlers hold annual spring/summer or July 4th paddling trips to the Trinity River.

Comments

Natural Hydrograph

American Whitewater received a virtual presentation for the flow proposal from Seth Naman representing the National Oceanic and Atmospheric Administration and Kyle De Julio representing the Yurok Tribe. The presentation highlighted benefits of shifting to a more natural hydrograph in the watershed including timely scouring of the rock bottom which improves habitat for the insects that fish eat and flow cues that encourage native fish to continue their lifecycle journeys downstream. For nearly three decades, these are the very same principles of the natural hydrograph that American Whitewater has encouraged on hydropower projects across California including the North Fork Feather, the Mokelumne and most recently on the San Joaquin River. In each case recreational flow has been successfully implemented within the tenets of a natural hydrograph and protection of biota. Based on this, American Whitewater finds merit in the Winter Flow Variability Action.

Impacts to Recreational Summer Flows

For the Trinity River reaches below Lewiston Dam that have a potential for impact, American Whitewater ran a HEC-DSSVUE analysis based off historical data from USGS Trinity River gauges 11525500 and 11527000 between the years 2001 through 2020 and a model of the Winter Flow Variability proposal



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provided by Kyle De Juilio. We highlighted the parameters of water year type; the paddling flow range; and the approximate date flows fall out of paddling range based on the proposed flow model. (See HEC-DSSVUE Graphs in Appendix A)

Overall, this analysis shows little impact in the Summer to the number of boatable days between the minimum, optimum and high river flow ranges outlined in the “holy grail” of whitewater boating guidebooks, Lars Holbeck and Chuck Stanley’s *The Best Whitewater in California* and more recently in Dan Menten’s *The New School Guide to Northern California Whitewater*. The boatable flow range for this section of the Trinity River are identified as 500 cfs minimum, 1500 cfs optimum and 4000 cfs high measured at USGS 11527000.

However, there is impact to the magnitude or amount of flow released during any given day in the summer period since more flow is shifted to the winter and spring months. In other words, there is potential to shift to the lower boatable range of flows as opposed to the optimum or higher boating flow range as you get later into the summer months.

Request for Consultation

American Whitewater understands that the model of the Winter Flow Variability Proposal does not necessarily equate to the actual hydrograph schedules that the TRRP flow workgroup will develop annually. Since the workgroup would have discretion to address stakeholder interests within the annual process, we ask that American Whitewater be contacted for consultation. Information sharing would be the sole goal of this annual consultation to ensure recreational paddling interests are considered in the decision-making process.

Conclusion

Overall, the TRRP directive to restore the fisheries of the Trinity River impacted by dam construction and diversions is a goal shared by American Whitewater. Given the limited impact to the number of boatable days within identified paddling flow ranges we can support the Winter Flow Variability Proposal, provided that paddling stakeholder interests continue to be considered when developing annual hydrograph schedules. We look forward to being a part of the flow conversations going forward and thank the TRRP for this opportunity to comment.

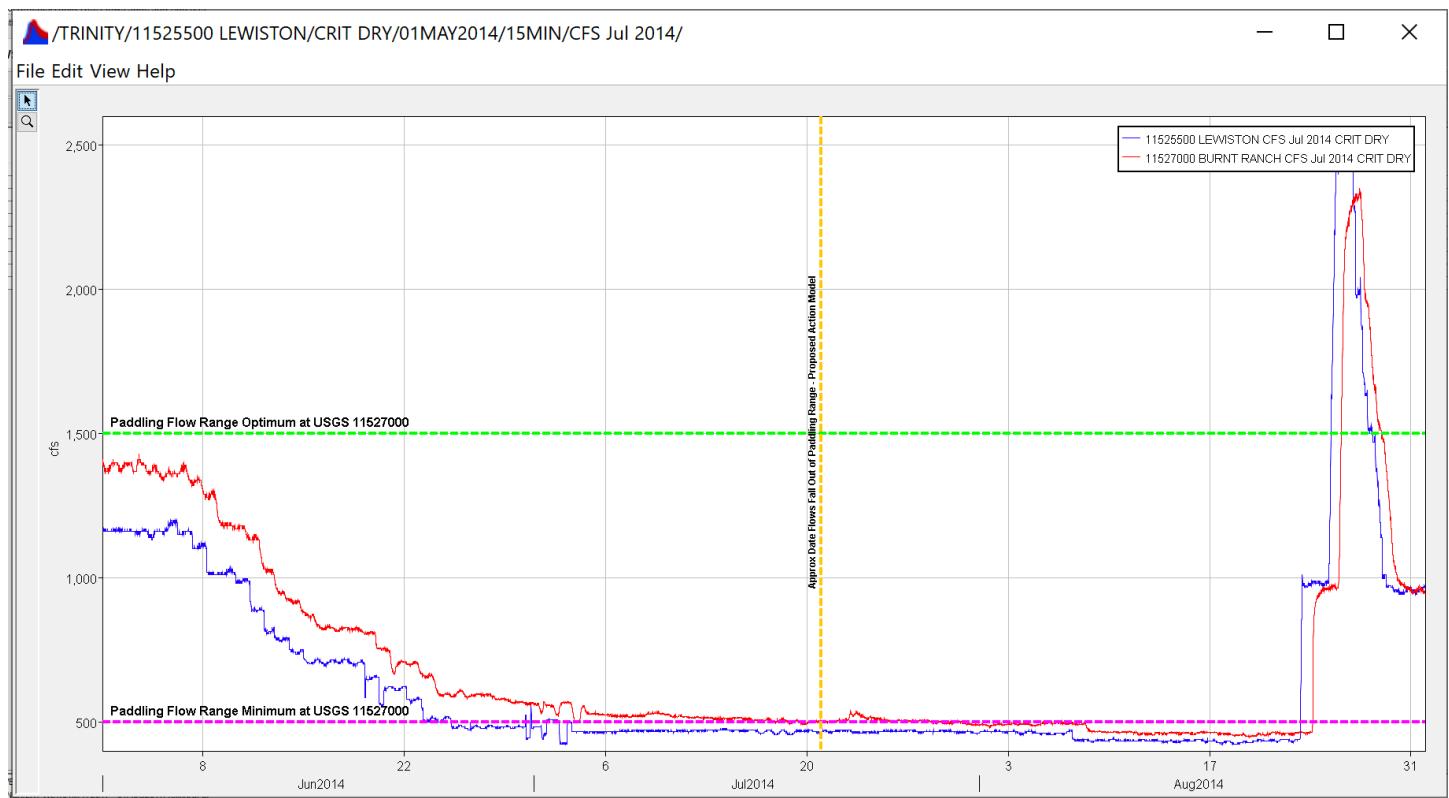
Sincerely,

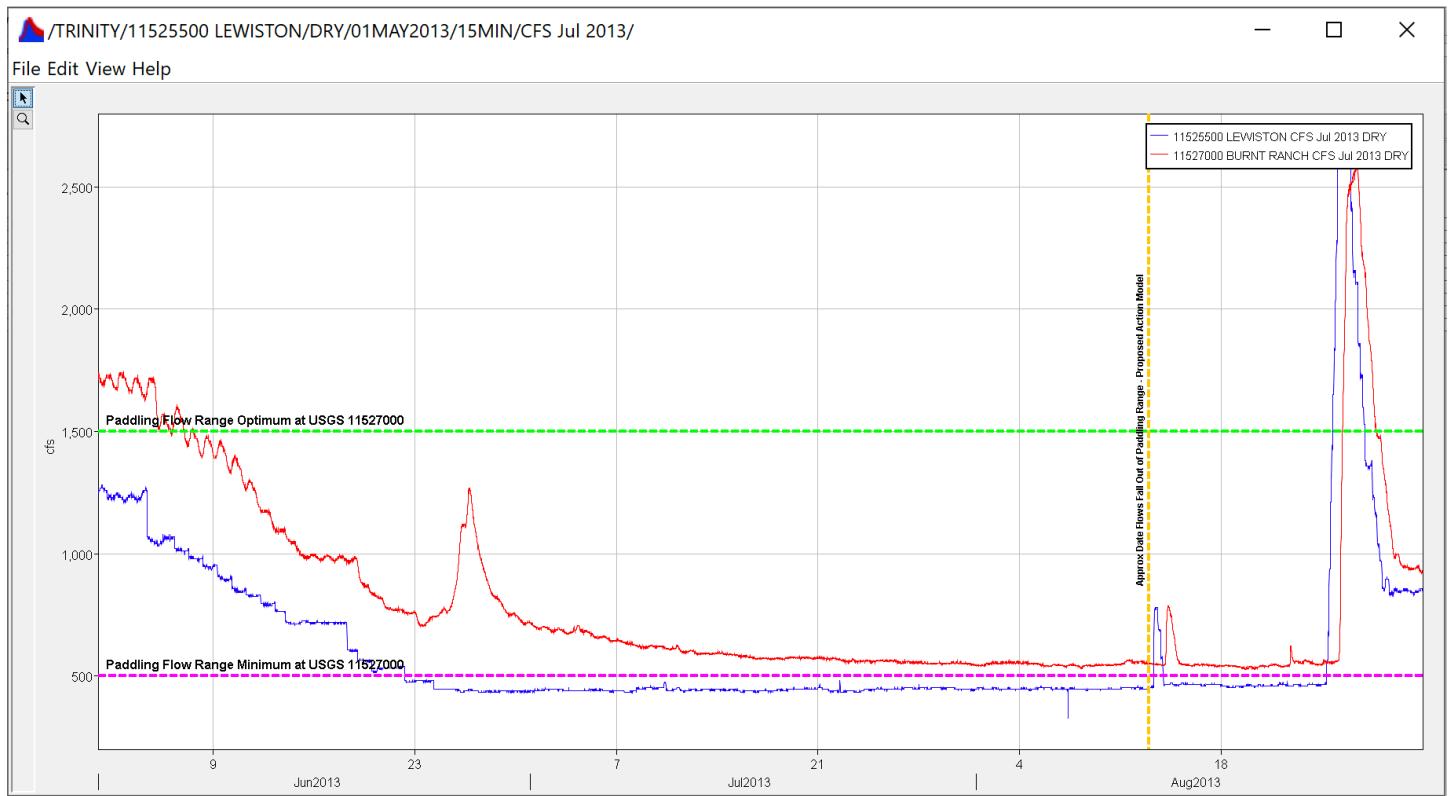
A handwritten signature in black ink that reads "Theresa L. Lorejo-Simsiman".

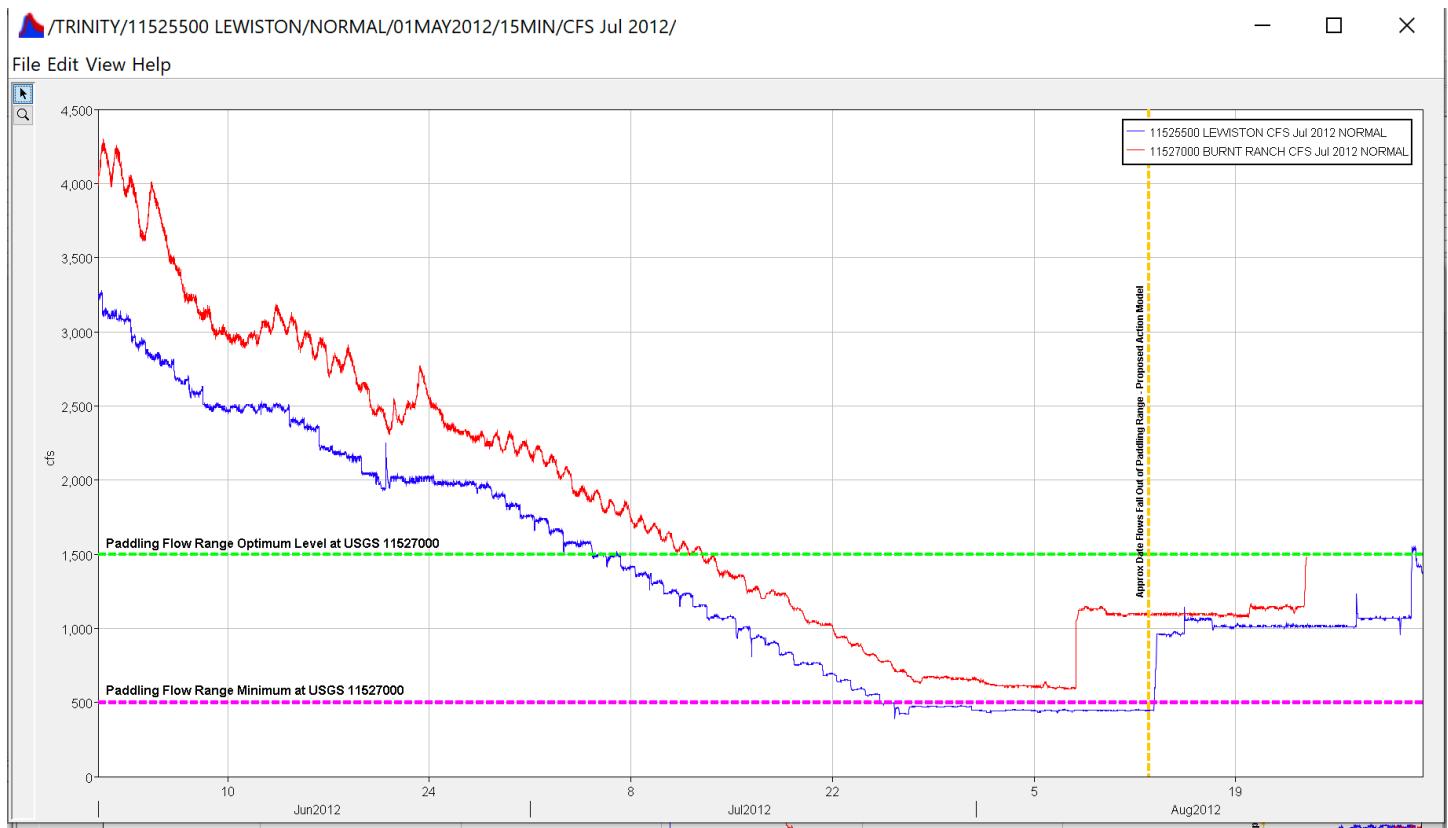
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Appendix A
HEC – DSSVUE
Analysis of USGS 11525500 and 11527000
Historical Recreational Flow Data from
2001-2020 by Representative Water Year Types

Provided for
Trinity River Restoration Program
Winter Flow Project Proposal Scoping
June 16, 2021







▲/TRINITY/11525500 LEWISTON/WET/01MAY2016/15MIN/CFS Jul 2016/

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