



ACTION ALERT! - Tell the North Coast Regional Water Quality Control Board to Amend its Trinity River Temperature Objectives by May 5!

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Background

The North Coast Regional Water Quality Control Board (NCRWQCB) is in the process of updating its "Water Quality Control Plan (Basin Plan) and requests input from the public on its priorities through the "Triennial Basin Plan Review." Please fill out the [online survey](#) and ask them to make updating Trinity River temperature objectives to reflect current science and protect spawning Chinook and Coho salmon a priority project.

The current Basin Plan contains the following temperature objectives for the Trinity River:

| River Reach | Daily Average Not to Exceed | Period |
|-----------------------------------|-----------------------------|--------------------------|
| Lewiston to Douglas City Bridge | 60 Degrees | July 1 - September 15 |
| Lewiston to Douglas City Bridge | 56 Degrees | September 15 - October 1 |
| Lewiston to North Fork confluence | 56 Degrees | October 1 - December 31 |

However, the most up to date science indicates that Chinook salmon need 53.5F to successfully spawn and hatch eggs, and Coho salmon need 48-50F to successfully spawn and hatch eggs. In 2021, a significant amount of Coho eggs died due to warm water.

Therefore, Save California Salmon recommends that the existing temperature objectives for the Trinity River be retained, and the following temperature objectives be added:

Lewiston Dam
July 1-Sept 14: 56 degrees
Sept. 15- Oct 31: 53.5 degrees
Nov. 1-Dec. 31: 50 degrees
Jan. 1-March 1: 48 degrees

Please fill out the [online survey](#) by May 5, 2023, and let the NCRWQCB know it should make updating Trinity Temperature objectives a high priority. See the attached sample answers to the questionnaire.

[Save California Salmon \(SCS\)](#) is dedicated to policy change and community advocacy for Northern California's salmon and fish dependent people. We support the fisheries and water protection work of the local communities, and advocate effective policy change for clean water, restored fisheries and vibrant communities.

We aim to help to support Tribes and the general public in engaging with public comments related to water pollution, fisheries, and beneficial use issues.

[Pacific Coast Federation of Fishermen's Associations \(PCFFA\)](#) and its sister organization, [Institute for Fisheries Resources \(IFR\)](#) represent the interests of coastal salmon-dependent commercial fishing families coastwide and are working with SCS and the Tribes to protect and improve salmon habitat to assure that salmon – and salmon-dependent communities, have a future.

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SAMPLE RESPONSES TO NCRWQCB QUESTIONNAIRE ON THE 2023 TRIENNIAL BASIN PLAN REVIEW

Questionnaire address: https://forms.microsoft.com/Pages/ResponsePage.aspx?id=JWoY_kl95kGZQQXSKB02wSD44qwt2IVNog-9A610oJdUMVpKUEo0WUpNQTJQRTNIRFBKWks3MjrPTiQIQCN0PWcu

Submission Details

1.Submitting Entity

Please choose from the following that describes your organization or your submitter status.

Answer: Self-Explanatory

2-7. Contact Information

Answer: Self-Explanatory

8.Editorial Amendments

Is the proposed amendment editorial or otherwise improves clarity or consistency within the Basin Plan?

Answer: No

9.Existing Triennial Review Projects

Is the proposed amendment related to projects from the 2018 Triennial Review? Information on the 2018 Triennial Review can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/triennial_review/

Answer: No

10. Narrative Description of Proposed Amendment

Please provide a clear and complete narrative description of the proposed amendment.

Answer:

Table 3-1b in the North Coast Basin Plan should be amended by adding the following to protect Chinook and Coho salmon in the Trinity River, while maintaining the existing temperature objectives:

Lewiston Dam

July 1-Sept 14: 56 degrees

Sept. 15- Oct 31: 53.5 degrees

Nov. 1-Dec. 31: 50 degrees

Jan. 1-March 1: 48 degrees

11. Beneficial Uses Definitions and/or Designations

Please select any Beneficial Uses (BU) affected by the proposed amendment. Alternatively, or additionally, if the information relates to a BU not currently designated in the Basin Plan, please describe the proposed new BU under "Other." If the proposed amendment affects all BUs, please respond with "ALL" under "Other." For the full definition of each BU, please see Chapter 2 of the Basin Plan, which can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter2BeneficialUses.pdf

Answers (check these boxes)

COMM - Commercial and Sport Fishing

COLD - Cold Freshwater Habitat

RARE - Rare, Threatened, or Endangered Species

MIGR - Migration of Aquatic Organisms

SPWN - Spawning, Reproduction, and/or Early Development

WQE - Water Quality Enhancement

CUL - Native American Culture

FISH - Subsistence Fishing

12. Water Quality Objectives

Does the proposed amendment change the Water Quality Objectives as described in Chapter 3 of the Basin Plan? Chapter 3 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter3WaterQualityObjectives.pdf

Answer: Yes

13. Water Quality Objectives - Details

Please describe any applicable Water Quality Objectives (WQO) related to the proposed amendment. Some WQOs are linked to specific Beneficial Uses; please include the exact wording from the Basin Plan when responding. WQOs are described in Chapter 3 of the Basin

Plan. Chapter 3 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter3WaterQualityObjectives.pdf

Answer:

Table 3-1b in the North Coast Basin Plan should be amended as follows to protect Chinook and Coho salmon in the Trinity River while keeping the existing temperature objectives as well:

Lewiston Dam

July 1-Sept 14: 56 degrees

Sept. 15- Oct 31: 53.5 degrees

Nov. 1-Dec. 31: 50 degrees

Jan. 1-March 1: 48 degrees

14. Antidegradation Policy

Does the proposed amendment affect the Antidegradation Policy in Chapter 3 of the Basin Plan? The Antidegradation Policy is in section 3.1.2, Chapter 3 of the Basin Plan. Chapter 3 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter3WaterQualityObjectives.pdf

Answer: Unknown

15. Implementation and Action Plans

Does the proposed amendment make any changes to implementation and action plans as found in Chapter 4 of the Basin Plan? Chapter 4 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/190204/Chapter4Implementation_lmb.pdf

Answer: Yes

16. Implementation and Action Plans - Details

Please describe how the proposed amendment changes existing or adds new implementation plans to Chapter 4. Chapter 4 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/190204/Chapter4Implementation_lmb.pdf

Answer:

The Trinity River Implementation Plan, 4.1.5 is grossly outdated and should be amended to include the current situation with the Trinity ROD and the fact that the SWRCB promised a Trinity specific water right hearing in 1990 that has not yet occurred. The temperature objective in the interim action plan also needs to be amended per item 13, above.

17. Monitoring

Does the proposed amendment affect the monitoring programs as described in Chapter 6 of the Basin Plan? Chapter 6 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter6SurveillanceAndMonitoring.pdf

Answer: No

18. Partners and Proponents

Please list any partner organizations or additional proponents of the proposed amendment. When listing multiple partners, please separate each entry with a **semicolon**. For example: Partner A; Partner B; Partner C.

Answer: Save California Salmon; Trinity River Restoration Program; Trinity County Board of Supervisors; Pacific Coast Federation of Fishermen's Associations; Institute for Fisheries Resources

19. Funding, Staffing, or Other Resources

Does your organization and/or partners have funds, staff, or resources to support the proposed amendment?

Answer: Maybe

Impacts from Proposed Amendment

Responses in this section should describe the effects of the proposed amendment should it be considered and adopted into the Basin Plan.

20. Regulatory Implications

Please describe the regulatory need, impact, and scale of the proposed amendment on the regulated community.

Answer: Existing temperature objectives for the Trinity River do not reflect current science. Chinook salmon eggs need to be no warmer than 53.5F to successfully hatch and Coho salmon eggs need 50F to successfully hatch. Significant mortality of Coho eggs occurred in 2021. Water Right Order 90-5 by the SWRCB does not adequately protect these fish, nor does it include summer temperature objectives for Spring Chinook. All of California's salmon fishing is shut down in 2023, partially as a result of inadequate populations, and poor water quality protections, of Klamath-Trinity salmon.

21. Waterbodies and Watersheds

Please identify the specific waterbody(ies) and watershed(s) affected by the proposed amendment. Please use the nomenclature found in Chapter 2, Table 2-1 of the Basin Plan relating to hydrologic units, areas and subareas. If the response is a list, please separate each waterbody name with a **semicolon**. For example:

Smith River Hydrologic Unit; Klamath River Hydrologic Unit; Lower Eel River Hydrologic Area.

Chapter 2 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter2BeneficialUses.pdf

Answer: Trinity River Hydrologic Unit

22. Impacts to Beneficial Uses

Please describe any foreseeable impacts to Beneficial Uses due to this proposed amendment. Please see Chapter 2 of the Basin Plan for the definitions of each BU. Chapter 2 can be found in the link below:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/180710/BPChapter2BeneficialUses.pdf

Answer: Implementation of revised Trinity River Temperature objectives should improve Trinity River Chinook and Coho salmon populations.

23. Implementation

Please describe any actions necessary to meet the proposed amendment's regulatory impact. For example: planning, permitting, management practices, coordination, infrastructure, etc.

Answer: SWRCB Water Right Order 90-5 should be amended because of these proposed Basin Plan amendments, or a separate Trinity River Water Right Hearing should be completed, as promised in SWRCB Water Right Order 90-5 and Water Quality Order 89-18.

24. Data, Information, or Evidence Submission

Do you or does your organization have references, data, information, or evidence supporting the proposed amendment? If so, Regional Water Board staff will reach out via your preferred method of communication to coordinate any data transfers.

Answer: No (unless you have something to add)