



TRINITY COUNTY

Board of Supervisors

P.O. BOX 1613, WEAVERVILLE, CALIFORNIA 96093-1613
PHONE (530) 623-1217 FAX (530) 623-8365

Jo Anna Beck
United States Bureau of Reclamation
Bay-Delta Office
801 I St, Ste. 140
Sacramento, CA 95814-2536

June 20, 2023

Dear Jo Anna,

Draft preliminary alternatives for the Trinity River Division pursuant to the 2021 Reinitiation of Consultation on the Long-Term Operation of the CVP and SWP were released to interested parties on June 6, 2023. Trinity County submits the following as comment on these alternatives:

1. Alternative 1 (Water Quality Control Plan) uses the 1992 Central Valley Project Improvement Act (CVPIA) as operational standards for the Trinity River Division. The CVPIA standards are far inferior to those established in the 2000 Record of Decision (ROD) for flow management, reservoir storage, diversion season, base flows, lower Klamath flow augmentation, and temperature management objectives. Alternative 1 should not be considered as part of the analysis, because the ROD was adopted specifically to address issues that were created by operating the TRD to the standards of the 1992 CVPIA.
2. Alternative 2 presents two methods for approaching flow management. Method 1 uses the February and March B120 forecast to determine the most appropriate volume of water to release water prior to the spring restoration flows. The use of the February and March B120 forecasts to release restoration water needs to be codified in program documents such as a new ROD.
3. Alternative 2 (multi-agency deliberation alternative) should be modified to consider the concerns of Trinity County as described in these comments and the new alternative offered below.
4. Proviso 2 of the 1955 Act allocates 50,000 acre-ft from the Trinity River Division for Humboldt County and other downstream users. This allocation of water is not accounted for in any of the alternatives listed.
5. With regard to Alternative 2, a 1.2 MAF starting minimum pool is not adequate to protect fish during a 1928-34 simulated drought. Adequate storage is as follows: 1.5 MAF first year, 1.3 MAF second year, 1.1 MAF third year; 1 MAF 4th year, 900k AF 5th year, 825k AF 6th year and 750k AF 7th year, per Kamman memo of 5/22/98.
6. Please define "through governance" in Alternative 2.

Reinitiation of Consultation

June 20, 2023

Page 2 of 3

7. Alternatives 2 and 3 should allow carryover of TRD ROD water from one water year to the next to increase flexibility of Trinity Lake storage management.
8. Method 2 of Alternative 2 references TRRP's adopted temperature objectives. These need to be identified.
9. Restoration flow releases under Alternative 3 include the possibility of summer base-flows lower than have been scheduled under the 2000 Trinity ROD. This will violate Water Resources Control Board Order 90-5 and North Coast Basin Plan temperature objectives.
10. Alternative 4 uses multi-year drought as an indicator for management of reservoir storage. Drought is undefined in the alternatives document.
11. Alternative 4 proposes to reduce restoration flows to bolster cold water storage reservoir capacities in times of multi-year drought. A reduction in diversions to the Central Valley Project should be considered as is proposed in Alternative 2, taking into account multiyear data and not simply a short one-to-three-year period. The amount of water released for restoration flows should also be considered during drought years.

Trinity County respectfully proposes a fifth alternative:

Alternative 5 – Local Alternative

Trinity Lake storage management

Planning Minimum Pool

Trinity Reservoir would be operated to a planning minimum carryover storage that meets temperature objectives during a simulated 1928-34 drought per Kamman memo of 5/22/98, as follows:

- First Year 1.5 MAF
- Second Year 1.3 MAF
- Third Year 1.1 MAF
- Fourth Year 1 MAF
- Fifth Year 900,000 AF
- Sixth Year 825,000 AF
- Seventh Year 750,000 AF
- Carryover of ROD flows from one water year to subsequent water year(s)
- 50,000 AF of the minimum storage should be reserved for water allocated to Humboldt County and other downstream users as stated in Proviso 2 of the 1955 Act

Diversion Season

Same as the No Action Alternative.

Variable Instream Flows

Restoration Flow Releases

Same as No Action Alternative, but allow for carryover of ROD flows to subsequent water year(s). No summer flow reductions.

Winter Flow Releases

Moratorium until monitoring results are available. If continued, reduce volume and magnitudes of flow, subject to Trinity Management Council (TMC) approval.

Base Flows

Same as No Action Alternative.

Reinitiation of Consultation

June 20, 2023

Page 3 of 3


Lower Klamath Flow Augmentation Releases

Same as the No Action Alternative.

Temperature Management

Meet all North Coast Basin Plan downstream temperature objectives plus revised temperatures objectives at Lewiston.

Sincerely,



Jill Cox

Chairman, Board of Supervisors