

## **Trinity River Division in the CVP-SWP Consultation February 26, 2019**

**Objective:** Seek support for the full inclusion of Trinity River Division operations in the Reinitiation of Consultation on the Long Term Operations (ROC on LTO).

### **Background:**

- The Trinity River Division is part of the Central Valley Project, and diverts an annual average of approximately 50% of Trinity Reservoir inflow to the Central Valley.
- The remainder is released to the Trinity River mainstem, which has a Record of Decision (ROD) for flow management.
- The biological opinion on the Trinity River mainstem flows was completed in 2000, and needs to be reinitiated because the status and baseline have changed, and new information reveals effects to SONCC coho salmon are in a manner or extent not previously considered.
- Consultation on ROC on LTO should include the entire operations of the Trinity River Division (both inter-basin transfer and Trinity ROD flows).
- In 2017, NMFS completed a framework programmatic biological opinion on the Lower Klamath Long Term Plan (LTP), which involves releasing Trinity Reservoir water to augment fall flows in the lower Klamath to avert potential adult salmon fish kills.

### **Issues**

- The Proposed Action in the ROC on LTO biological assessment is inconsistent with respect to including the Trinity River Division and the Lower Klamath LTP. The proposed action section (4.9.22) discusses the Trinity ROD flows and the Lower Klamath LTP as being in the action. However, Table 4-6 and Section 4.10 shows Trinity flows not included in this consultation.
- Some Reclamation staffers recently clarified they do not want to include the Trinity River ROD flows in the consultation, and that they are only including the inter-basin diversion into the Proposed Action.
- Consulting on the inter-basin diversion of the Trinity River Division and the Trinity River ROD flows would fully integrate effects of the LTO.
- While not as critical, including the Lower Klamath LTP would also provide Reclamation with incidental take exemption for fall flow augmentation, and relieve Reclamation the responsibility to consult with NMFS each time Reclamation proposes to augment fall flows.

### **Recommendations:**

- Seek Barry's and Paul Souza's support for including the Trinity ROD flows into the ROC on LTO consultation.
- If the Trinity ROD flows are not included in the ROC on LTO, then we need Reclamation to commit to reinitiating on the Trinity ROD flows.