# TRINITY COUNTY

## Office of the County Administrator

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October 8th, 2026

Delta Science Program — Independent Review Panel
c/o Dr. Lisamarie Windham-Myers, Delta Lead Scientist
Delta Stewardship Council
715 P Street, Sacramento, CA 95814

**Re: Public Input — Peer Review of New Lines of Evidence for Effects on Fish from the Long-Term Operations of the CVP and SWP: Recognizing Trinity River Trans-Basin Inputs in Delta Analyses**

Dear Dr. Windham-Myers and Members of the Review Panel:

Trinity County staff submits this input on the peer review of the new lines of evidence developed to evaluate export-related effects on fish in the Sacramento–San Joaquin Delta. Trinity County is the county of origin of the Trinity River and the home of the Trinity River Division (TRD), the northernmost unit of the Central Valley Project (CVP). We write to ensure the review recognizes a fact that is easily lost in a Delta-focused analysis: a substantial share of the water being operated, moved, and exported in the Delta does not originate in the Sacramento Basin at all.

The TRD is a trans-basin diversion. Water is stored at Trinity Dam, released to Lewiston, and carried through the Clear Creek Tunnel to Whiskeytown and into Keswick Reservoir, where it commingles with Sacramento River water bound for the Delta. Historically, up to roughly 90 percent of the Trinity's flow — on the order of a million acre-feet in a year — was diverted into the Sacramento system. Today the split is governed by the 2000 Trinity River Record of Decision, which retains approximately 369,000 to 815,000 acre-feet in the Trinity each year depending on water-year type, with the remainder entering the Sacramento River and flowing to the Delta. In other words, part of the very water whose export-related effects on fish these lines of evidence assess is imported Trinity River water.

This matters for the review in three ways. First, the Delta inflow and export volumes underlying the particle-tracking, entrainment, and life-cycle analyses are partly Trinity-sourced; treating them as a purely Sacramento or Delta quantity obscures where the water comes from. Second, that source is not fixed — it varies by water-year type and is the subject of a separate, still-unresolved Endangered Species Act consultation on the TRD. The Long-Term Operation (LTO) EIS itself lists the Trinity River Division among its "Issues to be Resolved" and holds Trinity operations at baseline across every alternative. Third, as others have noted in the LTO record, not accounting for the water that must remain in the Trinity Basin for restoration, fisheries, and tribal trust obligations risks overstating the water available for export.

We respectfully ask that the panel and the underlying lines of evidence: (1) explicitly recognize the Trinity River trans-basin import as a source term for Delta inflow and exports; (2) acknowledge the uncertainty in that source, given water-year variability and the pending TRD consultation, rather than treating total Delta inflow and export as fixed; and (3) recommend that Delta analyses trace exported water to its basin of origin, so that effects attributed to "exports" remain connected to the upstream decisions that determine how much water is there to export in the first place. Recognizing where the water comes from will make the analysis more transparent, more accurate, and more useful to decision-makers.

Thank you for your consideration. Trinity County welcomes the opportunity to serve as a resource on the Trinity River and the Trinity River Division.

Sincerely

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