

April 11, 2005

Chief, Protected Resources Division
National Marine Fisheries Service
525 NE Oregon Street, Suite 500
Portland, Oregon 97232-2737

Subject: Proposed Listing, 27 ESUs of west coast salmonids, California Central Valley steelhead, *Oncorhynchus mykiss*

Dear Madame or sir:

Trout Unlimited, California Trout and the Northern California Council of the Federation of Fly Fishers respectfully request that the National Marine Fisheries Service (NOAA Fisheries) reject recommendations of the California Department of Fish and Game (DFG) related to Central Valley steelhead as outlined in its letter to your agency dated November 12, 2004.

The basis for our request that NOAA Fisheries reject the DFG recommendations is that they were formed in a scientifically deficient manner and inaccurately depict the poor condition of Central Valley steelhead stocks. Facts supporting rejection are these:

1. The April 5, 2005 letter from the American Fisheries Society to your office clearly indicates that the DFG recommendations are not based on "sound science."
2. Early results of studies now underway within DFG indicate that Central Valley steelhead may be in worse condition than had been previously thought.
3. The DFG recommendations have failed to consider future adverse effects on salmonids of planned Sacramento-San Joaquin rivers system water storage and water export works and procedures¹. Among these are the South Delta Improvement Project, that will increase exports by a minimum of 350,000 acre feet per year, and flow regimens which will reduce the fishery-benefitting cold water refugia from a present location below the Red Bluff Diversion Dam to a point approximately 15 miles upstream toward Redding. These plans may have disastrous impacts on all ESU fishery populations.
4. If the DFG recommendations are followed by your agency the result may well be eventual extirpation of "threatened" Central Valley *O. Mykiss*.

Our organizations represent sport anglers who fish for steelhead and non-anadromous forms of rainbow trout both above and below Shasta Dam. We have a long history of involvement in fishery issues associated with the Sacramento - San Joaquin rivers and their tributaries. We know the territory.

To assist in your understanding of our position we have enclosed a copy of our January 7 letter to the Department of Fish and Game. It provides expanded information related to our concerns.

¹ While our concern is specifically with anadromous *O. mykiss*, your agency may also wish to assess the probable effects of these water storage and increased export proposals on the various runs of Central Valley ESU salmon and other anadromous and resident fish populations.

We have assisted and supported DFG in sport angling conservation matters throughout California. However, we have reluctantly concluded that in this instance the scientific inaccuracies and results leading to the DFG recommendations must be challenged. Central Valley steelhead are clearly “threatened” under the Endangered Species Act.

We therefore respectfully request that NOAA Fisheries disregard the California Department of Fish and Game’s recommendations related to Central Valley steelhead, including, specifically, delisting *O. mykiss* and dividing the ESU.

Sincerely,

Charles P. Bucaria, Sr.
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Phil Greenlee,
President
Northern California Council,
Federation of Fly Fishers

David Katz,
California Director
Trout Unlimited

Brian Stranko,
Executive Director
California Trout

Enclosure

cc: Honorable Dianne Feinstein, U.S. Senator
Honorable Barbara Boxer, U.S. Senator
Honorable Michael Chrisman, Secretary, Resources Agency, State of California
L. Ryan Broddrick, Director, California Department of Fish and Game
Interested Parties