

April 1, 1997

Jaqueline E. Schafer
Director, California Department of Fish and Game

Dear Director Schafer:

We are writing as members of the Ecosystem Roundtable in regard to the Department of Fish and Game's (DFG) proposed salmon and steelhead hatchery on the Tuolumne River. We have been involved with the CALFED Ecosystem Restoration Program planning, and endorse its underlying approach to restore ecological functions and processes to support naturally-sustaining populations of native plant and animal species dependent on the Central Valley watershed. We believe the DFG's proposed Tuolumne River Salmon Hatchery is inconsistent with this restoration approach, and we are opposed to both the project and continued expenditure of funds and staff time on its planning.

The Tuolumne River is the largest tributary in the San Joaquin Valley, and has the greatest potential of any river in the basin to restore the physical processes on which a healthy alluvial river ecosystem (and its native fish species) depends. The January flooding on the river has increased significantly this potential - planning for an expanded floodway below New Don Pedro Dam will allow the river to carry more than 50% of its current capacity.

The Federal Energy Regulatory Commission (FERC) Settlement Agreement on the Tuolumne River provides an unprecedented opportunity for a broad coalition of stakeholders to work together to develop and implement a comprehensive ecosystem restoration plan. The DFG did not discuss the proposed hatchery during discussions leading to the Agreement, which is based on a strategy to restore naturally-occurring salmon populations. The proposed hatchery has the potential to undermine actions stemming from this Agreement, and to divide the stakeholders involved in the restoration planning process. We support the US Fish and Wildlife's recommendation (attached) to defer consideration of a hatchery on the river until sufficient time has been provided to evaluate the effectiveness of ecosystem restoration actions.

We recognize the complexities associated with the proposed hatchery planning and the Four Pumps Mitigation Program. Under the terms of the Four Pumps Agreement between DFG and the Department of Water Resources (DWR), the program has developed a large deficit in replacing chinook salmon. Although the Agreement gives preference to habitat restoration over hatchery production, to date more than half of the chinook salmon credits are associated with the Merced River hatchery. Instead of relying on the proposed hatchery to produce chinook salmon credits, we encourage the DFG and DWR program staff to address the program deficit issue by improving and expanding their effort to restore physical habitat and flows in the San Joaquin basin and/or

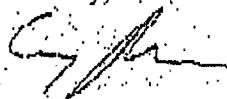
Jacqueline E. Shafer
April 1, 1997
page 2

investigating the need to amend the Agreement to better reflect an ecosystem restoration strategy. The issue is not that a mitigation responsibility exists, but how to best discharge that obligation in a manner consistent with a comprehensive ecosystem restoration strategy.

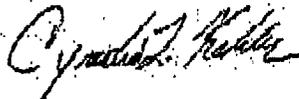
We are skeptical that the expenditure of funds from programs under the purview of the Ecosystem Roundtable is appropriate for the planning and/or construction of the proposed Tuolumne River hatchery. Instead of pursuing this new project, we suggest the DFG participate in a complete reassessment of the role existing hatcheries serve as management tools in a comprehensive ecosystem restoration program for the Central Valley watershed.

Finally, given the divergent views of the proposed Tuolumne River hatchery we suggest meeting with you directly to discuss our concerns. Although the DFG has organized hatchery stakeholder meetings, we are concerned that involved parties have widely varying perceptions regarding the benefits of the hatchery project. We hope to clarify this issue by meeting with you and other interested stakeholders before the DFG and DWR program staff make a decision whether to proceed with the project funding.

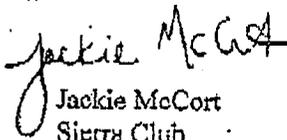
Sincerely,



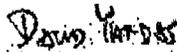
Gary Bobker
The Bay Institute of San Francisco



Cynthia Koehler
Natural Heritage Institute



Jackie McCort
Sierra Club



David Yardas
Environmental Defense Fund

cc:
David Kennedy, CDWR
Lester Snow, CALFED
Wayne White, USFWS