

# FEDERATION OF FLY FISHERS.

Conserving -- Restoring -- Educating through Fly Fishing

## Northern California Council

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Dick

January 23, 1999

Mr. Lester A. Snow  
Executive Director  
CalFed Bay-Delta Program  
1416 8th Street, Suite 1155  
Sacramento, CA 95814

Via Facsimile: (916) 654-9780

Subject: Central Valley Steelhead Restoration Criteria

Dear Mr. Snow:

This is to thank you for referring me to your Assistant Director, Mr. Dick Daniel, at last Wednesday night's Lodi Phase II Report hearing, and to inform you that we had a useful and productive meeting to discuss Central Valley Steelhead questions on Thursday. As an outgrowth of that meeting, it is also to ask that stakeholders be made a part of the process of developing a working definition for the term "recovery" as it will apply to a steelhead "delisting" standard, along with National Marine Fisheries Service and California Department of Fish and Game representatives.

As was explained to me, your staff is committed to a program which will result in a viable steelhead population in both Sacramento and San Joaquin river systems. Recognition by CalFed of the presence of a reproducing native stock in the San Joaquin and its tributaries is good news. Some knotty issues remain, as is expectable given the massive and complex undertaking which engages you.

To the angling community the question of what constitutes recovery of a species is among the most important of the matters before us. Your September 30, 1998 Core Team report recommendation, Objective 6 is to restore self-sustaining populations of native steelhead in the waters likely to hold them, to average numbers experienced between 1980 and 1998. A main difficulty with that approach is, that if adopted, it would ratify the diminished steelhead counts which resulted from modifications to the river system and other man-induced environmental impacts.

Clearly this is a complex issue. It is made more difficult by the fact that the historic record is incomplete. Mr. Daniel correctly points out that steelhead counts can and do vary greatly from year to year, depending upon a wide variety of conditions. Some of these are outside of the ability of man to offset. For this reason it would seem that steelhead recovery should, at the

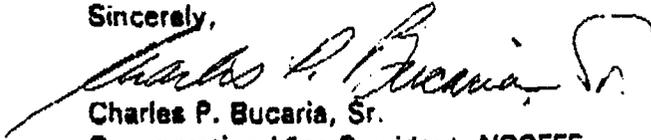
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minimum, be to a sustainable condition under a worse case scenario. Our view is that condition should be set into an earlier time period, more reflective of the pre-dam and pre-diversion era. After all, it was these public works which have been major contributors to bringing Central Valley fisheries to their present depleted condition.

We plan to engage NMFS in this discussion, as well as your agency. Clearly the leadership in restoration criteria should come from the scientific community. However, in view of the absence of comprehensive historic data other input is needed. Both oral history and other stakeholder input should be made important parts of the steelhead restoration threshold decision. Restoration to diminished abundance is no restoration at all. However, reasonable people working reasonably can produce positive decisions and actions.

Please advise me of the ways we may best interact with CalFed and other agencies in developing recovery and delisting criteria.

Sincerely,



Charles P. Bucaria, Sr.  
Conservation Vice-President, NCCFFF

For the following organizations:

Northern California Council, Federation of Fly Fishers  
Southwest Council, Federation of Fly Fishers  
California Sport Fishing Protection Alliance  
California Trout  
Trout Unlimited  
United Anglers

Friends of the River  
Sierra Club

cc: Dr. William T. Hogarth  
Mr. Dick Daniel  
Interested Parties