



ENGLUND MARINE & INDUSTRIAL SUPPLY



November 2, 2018
Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

RE: Salmon fishing and seafood businesses support adopting strong new water quality standards in Phase II of the Bay-Delta Water Quality Control Plan to save Central Valley salmon.

Dear Chair Marcus,

The undersigned owners and representatives of salmon fishing-dependent businesses and organizations urge the State Water Resources Control Board to adopt, at the earliest possible date, stronger water quality objectives to protect California's native salmon. As you update the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (WQCP), the Board must set stronger requirements for Sacramento River inflows to the Sacramento-San Joaquin Delta, in-Delta channel flows, total inflow to San Francisco Bay, protection of coldwater pool at upstream reservoirs, and other objectives to enable the restoration of California's Central Valley salmon fishery. If the Board fails to adopt stronger protections, the salmon that we and our customers and members depend on for their commercial and recreational benefits will not recover.

California's salmon fisheries are in a state of crisis. Since the early 1980s, over 90 percent of commercial salmon permits have been lost; ocean recreational and sport-charter participation has decreased; inland guided and recreational fishing opportunities have evaporated. Commercial and recreational fisheries have been repeatedly closed or severely curtailed over the past decade, with devastating impacts on fishing businesses and families throughout the state. The lowest number of returning adult salmon ever recorded in the Central Valley occurred in the last decade.

In a normal salmon season over 23,000 people are employed in California adding over \$1.4 billion in economic activity to the state. Although some might want you to ignore us, our jobs and businesses matter too. Families and businesses dependent on salmon fishing are spread throughout Northern and Central California, from the coast to areas along inland rivers. This year, Commerce Secretary Ross declared that commercial fisheries in California were a failure for the 2016 and 2017 seasons, reflecting the dire state of our industry.

In 1995, the Board's Bay-Delta Water Quality Control Plan established a narrative objective to require flows and water quality conditions necessary to achieve a doubling of natural salmon populations from the 1967 to 1991 period, which is known as the salmon doubling objective. This objective is also enshrined in federal law (the 1992 Central Valley Project Improvement Act). Unfortunately, since adopting the 1995 plan our native salmon runs have continued to decline, harming our communities and livelihoods. In 2017, adult Sacramento fall-run Chinook salmon returns were 4.2 percent of the doubling goal.

All of these losses and our state's track record of failure are caused by the deliberate choice to manage the Central Valley rivers in ways that turn the natural hydrograph on its head and starve salmon of the water they need to survive. If the Board doesn't act to protect fisheries and fishing businesses and restore balance to this system now, California may lose our unique salmon fishery, one of the state's (and nation's) finest natural foods,

and the coastal and inland communities and families that rely on salmon will be severely impacted. We are the southern boundary of where salmon are found in North America, and only the Board can order the reforms needed to retain this incredible natural asset.

The Board's own scientific analysis demonstrates overwhelmingly that Bay inflow is critical to the health of estuarine species and habitats. The proposal to require 55 percent of Sacramento River runoff reach and flow through the Delta to the Bay is far less than the 75 percent of un-impaired Sacramento River inflow that the Board previously determined was necessary to protect these public trust resources. We understand the Board is required to balance the need to protect public trust resources with other needs and uses but we urge the Board to recognize how far away from natural conditions water use in the Central Valley has gotten, especially with large volumes being exported south of the Delta to junior water rights holders.

The National Marine Fisheries Science Center at Santa Cruz has been releasing and tracking the survival of Chinook salmon smolts in the upper Sacramento River annually since 2007. Their analyses have indicated that of the many environmental variables collected in the river, river flow during outmigration is the most significant variable impacting salmon smolt survival. Furthermore, another recent study published by Cyril Michel from the NMFS Santa Cruz lab builds on this and presents evidence from coded-wire tag data that river flow during the outmigration has not only a strong relationship with outmigration survival, but also on overall population success for winter-run, late-fall-run and fall-run Chinook salmon populations in the Sacramento River. We will see that the Board receives it as further evidence that higher flows are needed.

Central Valley fall-run Chinook salmon, on which our customers and businesses depend, require three major improvements, which the Board should address through the Phase 2 SED. First, existing flows in the winter and spring months in all but the wettest years are seriously impeding the productivity of the Sacramento River and its tributaries. The Board's approach should significantly increase flows in the Sacramento River, where scientific studies demonstrate that higher flows result in higher survival of migrating juvenile salmon safely downstream. Currently, these fish migrate through a river system that in most years has become a hostile migration corridor. In the Feather River, higher flows are also needed to cleanse that river of the dangerous salmon parasite *Ceratonova shasta*. The lack of spring flows in *status quo* water operations are driven by water management decisions that alter hydrology and put salmon last. You can balance and change this.

To address the issue of low winter and spring flows reducing salmon survival, greater flows are badly needed. The California Dept. of Fish and Wildlife has recommended minimum bypass flows at Wilkins Slough, and the Colusa Drain. The National Marine Fisheries Service has pointed to minimum flows to insure salmon survival through the Lower Sacramento River and the Delta. The Board should analyze how often these key

suggested minimum flows would be achieved under the proposed 55 percent unimpaired flow and other alternatives.

Second, we strongly support the inclusion of the cold water habitat objective in the proposed plan, as there is also an acute need for the Board to address temperature problems in the upper Sacramento River and tributaries for salmon spawning, including fall-run spawning after the emergence of winter run salmon fry from gravel beds. After the emergence of winter run, typically in late October, water temperatures are often allowed to soar above the minimum 56 degrees needed to keep incubating fall-run eggs, which hatch later, alive. This typically persists for weeks until the onset of winter finally cools the river. In the interim, we lose a large percentage of the fall-run eggs incubating in the gravel. Again, all because of summertime water management decisions that put salmon last. The Board now has the opportunity to address this.

Finally, in the late summer and early fall, the Bureau of Reclamation currently releases from Lake Shasta much higher flows than are needed for temperature control for salmon, and then drastically reduces releases following winter run emergence. This reduction in reservoir releases often dewateres fall-run redds and kills a significant portion of the fall-run eggs incubating in the gravel, another issue the Board has the authority and responsibility to fix. We appreciate that the proposed cold water habitat objective includes discussion of minimizing redd dewatering, and it is critical that this objective be adequately implemented. Managing natural seasonal flow, temperature, and water levels to protect non-listed salmon should be prioritized by the Board in order to protect the Central Valley salmon runs we and our members and customers rely on.

Because the Board is also proposing to require that only 40 percent of the unimpaired runoff from three San Joaquin tributaries flow into the Delta, total Bay inflow required during the February–June period will be around 51 percent of unimpaired runoff, obviously short of the three-quarters of Central Valley runoff you've documented must reach the Bay in order to protect public trust resources, including our salmon fishery.

The Board has the opportunity now to fix the problems outlined above. It's not just a question of how much water but also when and where and what temperature that water is used. We therefore urge you to act now to ensure that the many public benefits of the San Francisco Bay estuary and the once great salmon runs and rivers that feed into it, are protected for future generations.

Sincerely,

Salmon Fishing Organizations, Businesses and Supporters

Fishing Organizations and Fishing Businesses

Abe and Ang	Cuanang	A and A Fishing	So. San Francisco	CA
Adam	Messner	Yardzen Landscape Services	Mill Valley	CA
Alan	Fong	Fisherman's Warehouse	Sacramento	CA
Ali	Hussainy	BD Outdoors	San Diego	CA
Allan	Ezell	Big Al's Guide Service	Rancho Murieta	CA
Barry	Canevaro	Fish Hookers Sportfishing Service	Isleton	CA
Barry	Nelson	Western Water Strategies	Berkley	CA
Bart	Hall	President The Fred Hall Shows	Camarillo	CA
Bill	Karr	Editor Western Outdoor News	Galt	CA
Bill	O'loughlin	President O'loughlin Trade Shows	Vancouver	WA
Bill	Shedd	President Aftco Mfg. Co. Inc.	Irvine	CA
Bill	Smith	Riptide Sportfishing	Redwood City	CA
Bill	Wells	California Delta Chamber	Rio Vista	CA
Bob	Eakes	Red Drum Tackle Shop	Buxton	NC
Bob	Ingles	Queen Of Hearts	Half Moon Bay	CA
Bob	Mellinger	Water4fish	Cloverdale	CA
Brad	Staples	Western Fishing Adventures	West Linn	OR
Brad	Stieler	TBA Inc.	Eastvale	CA
Brett	Chamberlain	Tackle Technology	Manteca	CA
Brian	Layng	President International Sports Expo	Sacramento	CA
Bruce	Akin	B.A.S.S. LLC	Birmingham	AL
Caleen	Sisk	Chief Winneman Wintu Tribe	Redding	CA
Carey	Graves	Daiwa Corporation	Cypress	CA
Carl	Liederman	Capt Harry's Fishing Supply	Miami	FL
Cat	Kaiser	Golden Gate Salmon Association	Santa Rosa	CA
Chad	Woods	Northern California Fish Reports	Reno	NV
Chris	Bonaparte	Tim Bailey & Associates	Mission Viejo	CA
Chris	Lawson	Commercial Salmon Fisherman	Lawsons Landing	CA
Chris	Mc Bride	Regional Mgr.Big Rock Sports	Clackamas	OR
Chuck	Hose	President Peak Sales And Marketing	Vacouver	WA
Connie	Parker	Pure Fishing	Columbia	SC
Craig	Hanson	Argo Sportfishing	San Francisco	CA
Craig	Nels	Tim Bailey & Associates	Livermore	CA
Dan	Bacher	The Fish Sniffer	Sacramento	CA
Dan	Ferris	MidWest Outdoors	Burr Ridge	IL
Dan	Mcdonald	President Yakima Bait	Granger	WA
Dan	Mckinley	Peak Sales and Marketing	Che+E41ney	WA
Dan	Parnel	Leisure Sales	Auburn	WA
Dan	Wolford	(ret) Science Dir. Coastside Fishing Club	Los Gatos	CA
Dave	Bitts	Pcffa F/V Elmarue	Mckinleyville	CA
Dave	Bulthuis	Costa	Daytona Beach	FL
Dave	Eng	Salmon Trout Steelheader	Portland	OR
Dave	Jacobs	Dave Jacobs Professional Guide Service	Redding	CA
David	Hurley	USA Fishing	Stockton	CA
David	Ostrach PhD	Ostrach Consulting	Woodland	CA
David	Pfeiffer	President Shimano N. America	Irvine	CA
David	Zeff	President Zefflaw Attorneys	San Francisco	CA

Dean	Fleck	Englund Marine and Industrial	Newport	OR
Denise	Bradford	Coyote Bait & Tackle	San Jose	CA
Dick	Figgins	President Dick Nite Spoons	Lake Stevens	WA
Don	Newman	PLINE Sales	Millbrae	CA
Doug	Lasko	President Okuma Fishing Tackle	Ontario	CA
Doug	Vernand	Channel Islands Sportfishing	Oxnard	CA
Fabian	Lomas	HWL Associates	Snohomish	WA
Felix	Smith	Save the American River Assn.	Carmichael	CA
Frank	Gee	F/V Ocean Gale	San Francisco	CA
Gabe	Miller	Farwest Sports	Fife	WA
Gary	Coe	Kokanee Power	Folsom	CA
Gary	Palmer	Fly By Night Excursions	Santa Rosa	CA
Gary	Remensnyder	Lew's Fishing Tackle	Lexington	SC
Gary	Remensnyder	Strike King Lure Company	Lexington	SC
Gary	Zurn	Vice President Big Rock Sports	Moorehead City	SC
George	Harris	Northwest Marine Trades Assoc.	Seattle	WA
George	Krumm	Fish Alaska Magazine	Oregon City+E239	OR
Gini	Whitney	Woodson Bridge Rv Park	Corning	CA
Glenn	Hughes	President American Sportfishing Assn.	Fairfax	VA
Harold	Davis	Davis Boats	Paso Robles	CA
Harry	Bresnahan	Harry Bresnahan's Guide Service	Woodland	WA
Hughes	Andry	Sportco Marketing	Richmond	TX
Hunt	Conrad	Golden Gate Salmon Association	Rohnert Park	CA
Jacky	Douglas	Wacky Jacky Charters	San Francisco,	CA
James	Ehlers	Lake Champlain International	Colchester	VT
James	Robertson	Outer Limits Charters	San Rafael	CA
Jan	McCleery	Save The California Delta Alliance	Discovery Bay	CA
Jason	Haefner	Do-It Molds	Denver	IA
Jeff	Pontius	ZEBCO Brands	Tulsa	OK
Jeff	Richards	President Coastside Fishing Club	Half Moon Bay	CA
Jeremiah	Dietrich	Tim Bailey & Associates	Creston	CA
Jeremy	Brown	Coastal Trollers Association	Seattle	WA
Jeremy	Grimes	President Fisherman's Friend	Lodi	CA
Jerry	Lampkin	T.N.G Motorsports Guide Service	Meadow Vista	CA
Jesse	Simpkins	St. Croix Rods	Park Falls	WI
Jim	Caito	Caito Fisheries Inc.	Fort Bragg	CA
Jim	Cox	President Calif. Striped Bass Assn.	Oakley	CA
Jim	Hardin	Grady-White	Greenville	NC
Jim	Hie	PFMCF SAS	Napa	CA
Jim	Martin	Chief Oregon Fish & Wildlife Retired	Mulino	OR
Jim	Salter	F/V Westerly	Half Moon Bay	CA
Jim	Stewart	Ironwood Pacific Outdoors	Tigard	OR
Joe	Crumrine	Bullet Weigts	Alda	NE
Joe	Donatini	Johnson Hicks Marine	Santa Cruz	CA
John	Beuttler	Fisheries Consultant	Berkley	CA
John	Gebers	Noyo Fishing Center	Fort Bragg	CA
John	Keizer	Salt Patroll.Com	Tacoma	WA
John	Kirk	International Sportsmen's Expo	Vancouver	WA
John	Koeppen	F/V Lulu	Cupertino	CA
John	Mc Manus	President, Golden Gate Salmon Assoc.	Pacifica	CA

John	Sherman	Simms Fishing	Discovery Bay	CA
Jonah	Li	Hi's Tackle Box	South San Francisco	CA
Jonas	Minton	Planning And Conservation League	Sacramento	CA
Jose	Setka	East Bay Mud	Lodi	CA
Keith	Fraser	Loch Lomand Bait	San Rafael	CA
Ken	Hammond	The Hammond Group	Inverness	IL
Kim	Sekole	Commercial Fishermen of Santa Barbara	Santa Barbara	CA
Kirk	Immens	Sportco Marketing	Lake in the Hills	IL
Kurt	Englund	President Englund Marine And Industrial	Astoria	OR
Kyle	Buchanan	Beau Mac Enterprises	Sumner	WA
Lalo	Flores	Applied Technologies	Fairfield	CA
Larry	Collins	San Francisco Crab Boat Owners Assn.	San Francisco	CA
Larry	Collins	F/V Autum Gale	San Francisco	CA
Leo	Winternitz	Fisheries Consultant	Sacramento	WA
Liz	Hamilton	Northwest Sportfishing Ind. Assn.	Oregon City	OR
Lorne	Edwards	Fisherman's Marketing Assn. Bodega Bay	Bodega Bay	CA
Louis	Chemi	Freedom Boat Club	Venice	FL
Marc	Gorelnik	Coastside Fishing Club	Half Moon Bay	CA
Mark	Chow	Magic Woman Sportfishing	Berkley	CA
Mark	Haynes	Haynes - Florence & Associates	Manteca	CA
Mark	Kratz	Rom Specialty Company, Inc.	Rome	NY
Mark	Smith	American Sportfishing Assn. Sacramento	Sacramento	CA
Michael	Coats	Coats Public Relations	Santa Rosa	CA
Michael	Jackson	Calif. Water Impact Network	Santa Barbara	CA
Michael	Scaglione	Pacific Catch Restaurant	Auburn	CA
Mike	Augney	President USA Fishing	Petaluma	CA
Mike	Bogue	Mike Bogue's Guide Service	Oak Run	CA
Mike	Hubbell	Santa Cruz Commercial Fishermen's Asn	Santa Cruz	CA
Mike	Leonard	VP American Sportfishing Association	Fairfax	VA
Mike	Lum	Fred Hall Shows	Long Beach	CA
Mike	McCorkle	Southern Calif. Trawlers Association	So Cal	CA
Nick	Di Croce	Sr Advisor Environmental Water Caucus	Solvag	CA
Nicole	Vasilaros	National Marine Manufacturers Association	Washington	DC
Noah	Oppenheim	PCFFA	San Francisco	CA
Pat	Kittle	Kittle's Tackle	Colusa	CA
Pat	Schlauch	Master Fishing Tackle	Carson	CA
Patrick	Neu	National Professional Anglers Association	Forestville	WI
Paul	Johnson	President Monterey Fish Market	San Francisco	CA
Paul	Kneeland	The Fish Sniffer	Colfax	CA
Peter	Foley	Boone Bait Company, Inc.	Winter Park	FL
Phil	Lillo	Don Coffey Company	Orlando	FL
Phil	Morlock	Shimano	Whitney	ON
Phil	Pirone	President Pro Cure Inc.	Salem	OR
Randy	Repass	Founder West Marine (ret) Chair - GGSA	Watsonville	CA
Rich	Basch	Ollie Damon's Rod & Reel Repair	Portland	OR
Rich	Zeilenga	Tackle Warehouse	San Louis Obispo	CA
Richard	Pool	President Pro-Troll	Concord	CA
Rick	Patri	Lucky Tackle Box	Studio City	CA
Rick	Powers	New Sea Angler Charters	Bodega Bay	CA
Rob	Bignall	Its All Good Guide Svc	Sherwood	OR

Robert	Maharry	F/V Maureen	Morro Bay	CA
Ron	Hiller	Active Outdoors	Tigard	OR
Roy	Gray	Roy Gray & Associates	Auburn	CA
Scott	Hill	Western Boat Shop	San Rafael	CA
Scott	Salyers	Bonnier Corporation	Miami	FL
Scott	Schalliol	Tim Bailey & Associates	Placentia	CA
Seth	Mitchell	Seth Mitchell's Fishing Guide Service	Chico	CA
Sherry	Ingles	Half Moon Bay Sportfishing	Half Moon Bay	CA
Steve	Grutbo	Smokehouse Products	Hood River	OR
Steve	Smits	ZEBCO Brands	Tulsa	OK
Sunny	Lampre	Sunny's Electric Marine	Sacramento	CA
Ted	Wilson	William Tell House	San Francisco	CA
Tim	Bailey	Tim Bailey & Associates	Northridge	CA
Tim	Klassen	Reel Steel Sportfishing	Eureka	CA
Tim	Schoonover	Maxima USA	Hillsboro	OR
Todd	Fraser	Bayside Marine	Santa Cruz	CA
Tom	Creedon	Scoma's Restaurant	San Francisco	CA
Tom	Fote	Jersey Coast Anglers Assn	Toms River	NJ
Tom	Hafer	Morro Bay Commercial Fisherman's Asn	Morro Bay	CA
Tom	Hester	President Poulsen Cascade Tackle	Portland	OR
Tom	Mattusch	Huli Cat Charters	Half Moon Bay	CA
Tom	McCray	Fisherman's Assn. of Moss Landing	Moss Landing,	CA
Tony	Amato	Salmon Trout Steelheader	Portland	OR
Trevor	Kennedy	Fishery Foundation of California	Sacramento	CA
Tristan	Merlaud	Outdoor Pro Shop	Sebastopol	CA
Troy	Cannia	Salmon Trollers Marketing Association	Fort Bragg	CA
Vance	Staplin	Morton And Company	Ciitrus Heights	CA
Victor	Rosasco	Water4fish	Stockton	CA
William	Hagen	Professor UC Davis	Davis	CA
Zac	Guerinoni	Biwaa U.S.A. LLC	Santa Rosa	CA
Zach	Schoonover	Maxima Fishing Line	Hillsboro	OR
Zack	Swanson	Rapala USA	Minnetonka	MN