



"The New Voice of Salmon"
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May, 16, 2013

Mr. Phil Isenberg, Chairman
Delta Stewardship Council
890 9th Street Ste 1500
Sacramento, CA 95814

Dear Chairman Isenberg and Council Members:

The Golden Gate Salmon Association (GGSA) is a coalition of salmon advocates that includes commercial and recreational salmon fisherman, businesses, restaurants, tribes, environmentalists, elected officials, families and communities that rely on salmon. GGSA's mission is to protect and restore California's largest salmon producing habitat comprised of the Central Valley river's that feed the Bay-Delta ecosystem and the communities that rely on salmon as a long-term, sustainable, commercial, recreational and cultural resource. Currently, California's salmon industry is valued at \$1.4 billion in economic activity annually and about half that much in economic activity and jobs again in Oregon. The industry employs tens of thousands of people from Santa Barbara to northern Oregon.

The stakeholders of the California salmon industry are highly critical of the Delta Stewardship Council's failure to address the recovery needs of the Central Valley salmon in the Delta Plan. Some of the stressors which impact salmon survival have been identified in the plan, but nowhere does the plan provide steps or even a roadmap of the activities that are needed to recover the severely depleted four species of Chinook salmon in the Central Valley. Like the BDCP, the Delta Plan addresses only habitat changes in the Delta.

The salmon cannot be restored with only habitat changes in the Delta. There is a large body of science including the state and federal fishery agencies that recognize that only a combination of both upriver habitat actions and Delta actions can restore the salmon populations. Delta operations, specifically the pumps in the South Delta, with their strong impact on upstream water movements and reservoir operations, severely impact the survival of juvenile salmon above the Delta. The Delta Plan fails to address these issues.

The Delta Stewardship Council was specifically given the authority and responsibility to address conditions above the Delta in the Sacramento-San Joaquin Delta Reform Act of 2009 (SB7). That law said:

"The Delta Plan shall include measures that promote all of the following characteristics of a healthy Delta Ecosystem.

1. *Viable populations of native resident and migratory species.*
2. *Functional corridors for migratory species.*
3. *Diverse and biological separate appropriate habitats and ecosystem processes.*
4. *Reduced threats and stresses on the Delta ecosystem.*
5. *Conditions conducive to meeting or exceeding the goals with respect to doubling salmon populations.*

None of these conditions have been met for salmon in the Delta Plan especially the last one. The Delta Plan includes no roadmap that will stop the continued downward slide of the salmon populations except in years of heavy precipitation. The Legislature labeled the Sacramento-San Joaquin watershed in crisis and said existing Delta policies are not sustainable. The current conditions for salmon are not sustainable and the Delta Plan has failed to respond.

The Golden Gate Salmon Association provided comments and recommendations to the Council on two occasions pointing out the salmon shortcomings in the draft plans. We provided comments on September 12, 2011 on Draft Plan Five and we again provided comments on the Final Draft Plan on September 24, 2012. It appears the Council paid no attention to our recommendations.

The Delta Plan fails to meet the co-equal goals of the Legislature. The Golden Gate Salmon Association contends that the plan must be revised, amended, supplemented or otherwise changed until it is in compliance with the intent of the Legislature particularly as it relates to salmon. Absent these changes, GGSA recommends that the Delta Plan be rejected.

Yours Truly,



Richard Pool

Secretary

Golden Gate Salmon Association