



*To advance the economic, social and environmental sustainability of Northern California
by enhancing and preserving the water rights, supplies and water quality.*

June 8, 2011

SENT VIA EMAIL

Mr. Phil Isenberg
Mr. Joe Grindstaff
Delta Stewardship Council
980 9th St, Suite 1500
Sacramento, CA 95814

Re: Sacramento Valley Sustainability-Salmonids

Dear Gentlemen:

The Northern California Water Association (“NCWA”) and water resources managers throughout the Sacramento Valley are undertaking ongoing efforts to foster regional sustainability in the Sacramento Valley. These efforts include partnering with federal and state agencies and our conservation partners to improve migratory corridors and habitat for anadromous fish within the region. To further these efforts and advance our scientific understanding of these fisheries in the Sacramento River hydrologic region, water resources managers throughout the region commissioned fisheries biologist Dave Vogel to prepare a scientific report investigating the reasons for fish population declines and, more importantly, how to improve anadromous fisheries in the Sacramento Valley. We are enclosing for your review the detailed scientific report entitled, *Insights into the Problems, Progress and Potential Solutions for Sacramento River Basin Native Anadromous Fish Restoration* and we look forward to discussing this further with you.

In summary, the report includes the following key conclusions:

- Despite the enormous, unprecedented actions and collaboration to improve fish production in the upper watersheds, there has been remarkable lack of focus or progress to fix the serious predation and habitat problems in the Delta, through which all Sacramento Valley anadromous fish must migrate. Overall, predation is likely the highest source of mortality to anadromous fish in the Delta. Despite the fact that in-Delta problems of predation at a variety of locations have been well-known for many years, very little progress -- in many instances, no progress -- has been made. Ironically, some measures implemented under the auspices of improving fish habitats have likely increased predation of anadromous fish in the Delta. The best available scientific evidence indicates that in-Delta predation and habitat problems have gotten worse during recent decades.
- Until significant progress is made on correcting the habitat problems and largely site-specific sources of native juvenile anadromous fish mortality in the Delta, it is likely that many of the

benefits of upstream actions are, and will continue to be, negated. Although many studies over decades have demonstrated low survival of anadromous fish in the Delta, more such studies continue and are proposed, but are not oriented to determine site-specific in-Delta mortality sources. Re-focused study efforts in the Delta are sorely needed with the objective of locating and fixing fish mortality sites. Overall, until major predation problems in the Delta are corrected, difficulties for anadromous fish restoration will remain.

- Other in-Delta and ocean-related actions also could significantly benefit the Sacramento Valley's salmonid populations. Appropriately-designed restoration of shallow-water rearing habitats in the Delta should be aggressively pursued because they would have a high probability of success. There may also be alternative ocean harvest methods that would increase salmonid populations by increasing the fecundity, or reproduction capacity, of the salmonids that spawn in the Sacramento Valley.
- The State Water Resources Control Board and California Department of Fish & Game have recently prepared reports describing flow criteria that would result in high reservoir releases to attempt to ameliorate problems in the Delta. If implemented as proposed, without considering the risk of drastically reducing reservoir levels in some years, cold-water storage may be depleted, resulting in devastating impacts on anadromous fish egg incubation at critical times. Additionally, improperly timed high flows could provide unfavorable conditions for mainstem rearing fish. Implementation of the flows described in the SWRCB and DFG reports would have a high potential of largely undoing decades' progress in restoring conditions for salmonids in the Sacramento Valley. Development of opportunities to reduce site-specific Delta stressors through non-flow measures is warranted and overdue.

The report also makes important recommendations for habitat improvements in the Sacramento Valley, which we will be continuing to work with federal and state agencies to implement.

We appreciate your review of this report and we look forward to talking further with you about ongoing efforts to improve anadromous fisheries in the Sacramento Valley and advancing the regional sustainability of our water resources.

Sincerely yours,



David J. Guy

Enclosure