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Dr. Lisamarie Windham-Myers, Delta Lead Scientist
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Submitted via email: reviewadvice@deltacouncil.ca.gov

To Dr. Windham-Myers,

Thank you for the opportunity to submit comments on the upcoming Peer Review of New Lines of Evidence for Effects on Fish from the Long-Term Operations of the Central Valley Project and State Water Project.

The Pacific Coast Federation of Fishermen's Associations (PCFFA) is a statewide coalition of commercial fishing organizations led by working fishermen from ports along the California coast. We are the voice of California's working commercial fishermen, standing up to protect their ability to make a living from the ocean. Our members are independent, small-scale commercial fishing businesses. We bring real-world experience, knowledge, and practical solutions to ocean management decisions because this is our work and we know what is at stake. The Institute for Fisheries Resources (IFR) is PCFFA's sister organization, focusing primarily on fisheries habitats, environmental conditions, and the protection of sustainable commercial fisheries.

Our members rely on harvestable abundance of Chinook salmon in the state and federal waters off California. In recent years, the decline in both fish populations and the opportunity to harvest Chinook salmon has had severe impacts on our families, our coastal communities, and the state economy. Salmon from the Sacramento River (fall-run Chinook, in particular) have traditionally been the largest contributor to our commercial and recreational ocean fisheries, and we are working to return those runs to harvestable abundance.

We are not a scientific organization, so do not comment on the details of the scientific review. We do, however, work with scientists in the hatcheries, agencies, and universities to understand how juvenile and adult salmon move through the Central Valley river systems. The ability of fish to spawn, rear, and transit their freshwater inland habitat is fundamental to their success and to the success of our fisheries.

As such, we encourage the review panel to consider all improvements on methods that monitor passage of juvenile salmon from spawning grounds all the way to the ocean. Understanding specific locations of high mortality in the river reaches and pumping facilities, as well as the overall survival to ocean waters, helps formulate water policy that directly affects our fish and our livelihoods. When we understand the specific locations and conditions that contribute to higher mortality, we are better able to modify water operations and develop mitigation measures when necessary.

Specifically, we encourage the panel to support all efforts to implement genetic stock identification (GSI) and parentage-based tagging (PBT) methods at all monitoring sites. These powerful genetic tools are capable of rapidly identifying salmon hatchery-origin fish with high specificity and speed. This information is crucial to understanding the effectiveness of different hatchery release strategies.

The final metric of success in our water policy decisions must be harvestable abundance of Chinook salmon in California waters. Simply remaining below entrainment targets in some years does not serve our fish populations, our fishing communities, or the public resources of California.

Thank you for your consideration.

Sarah Bates.
President, IFR

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