

Agenda: 2-5-04
Item: 6A

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Sacramento
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ROBERT R. TREANOR
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STATE OF CALIFORNIA
Fish and Game Commission

November 3, 2003

Mr. Kevin Collins, Chair
Santa Cruz County Fish and Game
Advisory Commission
701 Ocean Street, Suite 400
Santa Cruz, CA 95060

Dear Mr. Collins:

This is to acknowledge receipt of your recent letter sent on behalf of the County of Santa Cruz Fish and Game Advisory Commission opposing the Department of Fish and Game's proposed changes to Section 8.00(c), Title 14, CCR, regarding low flow closures in certain central coast streams. A copy will be provided to the Commission prior to it considering this issue at its December 5, 2003, meeting in Sacramento.

Your last sentence of "Improved coordination between the California Department of Fish and Game and NOAA Fisheries can only help our common efforts to restore steelhead and salmon." is an interesting comment. For your information, the Department and NOAA Fisheries are coordinating very closely and in fact, the Department's proposed changes to our salmon and steelhead streams are a result of NOAA Fisheries' requests.

On behalf of the Commission, thank you for taking the time to share the thoughts of Santa Cruz County Fish and Game Advisory Commission on the proposed changes to the sport fishing regulations.

Sincerely,



Robert R. Treanor
Executive Director

cc: All Commissioners
Deputy Director Mastrup
Fisheries Programs Branch
Central Coast Region



COUNTY OF SANTA CRUZ

FISH AND GAME ADVISORY COMMISSION

701 OCEAN STREET, SUITE 400, SANTA CRUZ, CA 95060
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October 24, 2003

California Fish and Game Commission
Robert Treanor, Director
1416 Ninth St.
Sacramento, CA 95814

RE: Response to Notice of Proposed Changes in the Sport **Fishing** Regulations

Members of the Fish and Game Commission:

The Santa Cruz County Fish and Game Advisory Commission (County Commission) is submitting the following comments in opposition to the proposed amendments to Subsection (c) of Section 8.00, Title 14, California Code of Regulations, **as** part of the proposed Sport Fishing Regulations for years 2004 and 2005. Specifically, the County Commission has grave concerns with adding further restrictions to the steelhead fishing season based on daily changes to flow conditions.

The issue of low flow closures is complex, and estimates of the correlation between low flows, sport angling, and added impacts to steelhead may be overestimated. While severe drought conditions may warrant stream closures, this should be handled on an emergency basis rather than as a possibly common and thus confusing change in the regulations. Requiring anglers to call in to phone lines in order to know if the streams are open to fishing on any given day could be regarded as arbitrary to people planning a day on the river. If the regulations become too complex they may be disregarded. Short coastal streams such as Aptos and Soquel and Corralitos Creeks are very flashy in the way they respond to rain events. Real-time monitoring records for Santa Cruz County demonstrate that once these watersheds achieve saturation, flow levels increase quickly in response to rainfall greater than one-third inch per hour. Similarly, flow levels quickly decrease as rain intensity decreases below this threshold.


The proposed amendments suggest that sport fishermen are significantly harming the steelhead fishery and further sportfishing restrictions will benefit the steelhead population. We are concerned that people who are respectful of the resource will feel that they are being unjustifiably blamed for declines in steelhead runs. Actually, it is the sportfishing community that actively educates fellow enthusiasts as to compliance with fishing regulations and other measures to protect the fish. The presence of lawful sport fishers out on the rivers is a deterrent to poaching and their reports have proven helpful to local Fish and Game wardens. **As** you may know, we have already lost a significant number of wardens in the Santa Cruz County - South Central Coast area due to state budget cuts.

We are all aware of the many adverse impacts human society places on our wildlife. Illegal water diversion, sedimentation, poaching, and lagoon breaching all cumulatively impact the steelhead populations. Low flow or drought conditions and marine mammal predation also affect the populations.

It is the opinion of members of the Santa Cruz County Fish and Game Advisory Commission that a catch and release fishery regulatory system will best work when there is a common understanding between the public and the Department. Straight foreword predictable rules are helpful. Therefore, the proposed amendment to the regulations should not be promulgated.

More local field research into **stream** conditions and fish biology will inform decisions on when to open and close the season. Improved coordination between the California Department of Fish and Game and **NOAA** Fisheries **can** only help our common efforts to restore steelhead and salmon.

Regards,

A handwritten signature in black ink, appearing to read 'Kevin Collins', with a stylized, flowing script.

Kevin Collins

Chair, Santa Cruz County Fish and Game Advisory Commission