



California Natural Resources Agency  
**DEPARTMENT OF FISH AND GAME**  
<http://www.dfg.ca.gov>

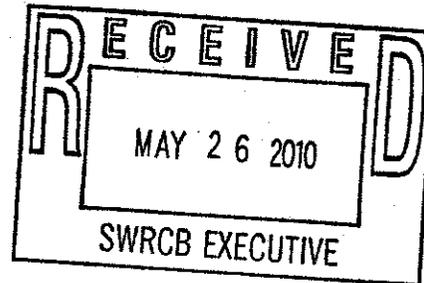
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**ARNOLD SCHWARZENEGGER, Governor**  
**DONALD KOCH, Director**



May 18, 2010

Jeanine Townsend  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street  
Sacramento, California 95812



**Subject:** Notice of opportunity for public comment on the proposed 2010 integrated report: Clean Water Act Section 303(d) list of Water Quality Limited Segments and Clean Water Act Section 305(b) assessment of surface water quality

Dear Ms. Townsend:

The Department of Fish and Game (Department) welcomes the opportunity to provide the State Water Resources Control Board (SWRCB) with comments regarding the Board's proposed 2010 integrated report for assessment of surface water quality and listing of water quality limited segments of California's rivers and streams pursuant to the Federal Clean Water Act.

The recent population crash of fall-run Chinook salmon along the Pacific coast was unprecedented and continues to be a common subject in the news. In response to this drastic decline, federal and state agencies closed all commercial and sportfishing off the California coast for 2008 and 2009 and is allowing a limited season in 2010. This decline in fall-run Chinook salmon abundance has resulted in a substantial economic loss to the communities and industries that depend on this natural resource.

The San Joaquin River fall-run Chinook salmon populations (adult escapement) have substantially declined since 2001. This decline began well before the downturn in ocean conditions and is correlated to a substantial reduction in spring stream flow levels when juvenile salmon are out-migrating from their natal tributaries (e.g. Stanislaus, Tuolumne and Merced Rivers).

As an example of the recent decline, Merced River Hatchery spawning of fall-run Chinook salmon females has fallen precipitously in the last four years; in 2006 only 76 females were spawned, in 2007 only 42 females were spawned, in 2008 only 13 females were spawned and, in 2009 only 46 females were spawned. As a point of reference the long term average number of females spawned is 283 females per year (e.g. for years 1980 through 2005). The recent female spawning, for years 2006 through 2009, is well below the historical average.

Historically the San Joaquin River Basin had substantial runs of Chinook salmon (e.g. both fall and spring-run). However, today only fall-run persist. The Department has submitted substantial information to both the SWRCB and the Central Valley Regional

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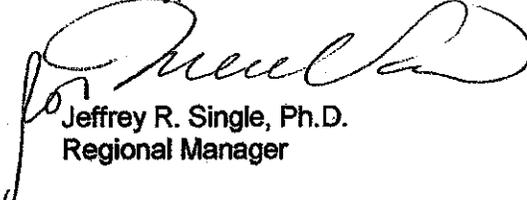
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Water Quality Control Board (CVRWQCB) documenting the decline of fall-run Chinook salmon in the San Joaquin River Basin. While several factors have contributed to this decline, the primary factor controlling fall-run Chinook salmon abundance in the San Joaquin River basin is lack of sufficient streamflow during the spring, the period when juvenile salmon (e.g. smolts) are out-migrating from the natal streams. This lack of spring flow results in juvenile salmon being exposed to substantially higher water temperatures than occurring under higher stream flow conditions. The Department has submitted documentation to both the SWRCB and the CVRWQCB substantiating the presence of water temperature levels in the Merced, Tuolumne, Stanislaus, and main-stem San Joaquin River that are deleterious to out-migrating juvenile salmon during the spring time period.

The Department, as the State's sole trustee agency for fish and wildlife resources, has jurisdiction over the conservation, protection, and management of both fall-run Chinook salmon and their habitat within the San Joaquin River basin to provide biologically sustainable populations of fall-run Chinook in the Merced, Tuolumne, and Stanislaus Rivers. The Department has identified presence of suitable water temperature for various inland life history phases (e.g. adult and juvenile) as being necessary for the conservation, protection, and management of fall-run Chinook salmon and their habitat in the San Joaquin River basin. Because water temperatures are impaired in the main-stem San Joaquin and its tributaries (e.g. CVRWQCB 2009 report to the SWRCB) the Department supports adding these water bodies to the statewide list of water bodies with impaired water quality.

The Department continues to support the State Water Resources Control Board's efforts to list the above rivers and the lower San Joaquin River as impaired bodies of water for temperature pursuant to section 303(d). If your staff needs any additional information, please encourage them to contact Andrew Gordus, Staff Environmental Scientist (Regional Water Quality Biologist), at 559-243-4014, extension 239.

Sincerely,



Jeffrey R. Single, Ph.D.  
Regional Manager

cc: Carl Wilcox, Water Branch  
Tim Heyne