

Chuck Wise
President
Larry Collins
Vice-President
David Bitts
Secretary
Marlyse Battistella
Treasurer
In Memoriam:
Nathaniel S. Bingham
Harold C. Christensen



**PACIFIC COAST FEDERATION
OF FISHERMEN'S ASSOCIATIONS**

<http://www.pcffa.org>

Please Respond to:
 California Office
P.O. Box 29370
San Francisco, CA 94129-0370
Tel: (415) 561-5080
Fax: (415) 561-5464

W.F. "Zeke" Grader, Jr.
Executive Director
Glen H. Spain
Northwest Regional Director
Mitch Farro
Fishery Enhancement Director
Vivian Bolin
Watershed Conservation Director
Duncan MacLean
Salmon Advisor

Northwest Office
P.O. Box 11170
Eugene, OR 97440-3370
Tel: (541) 689-2000
Fax: (541) 689-2500

20 March 2009

Matt St. John
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

**RE: Comments for the North Coast Regional Water Quality Control Board's 2008 303(d)
List of Water Quality Limited Segments**

Dear Mr. St. John:

The Pacific Coast Federation of Fishermen's Associations (PCFFA), representing working men and women in the West Coast commercial fishing fleet, supports the North Coast Regional Water Quality Control Board (Regional Board) staff's proposed additions to the 2008 303(d) List of Impaired Waters.

PCFFA supports listing segments of the Klamath River for presence of microcystin toxins, sediment, and mercury. The Klamath River was once the third most productive salmon river system in the west coast, producing a salmon escapement of between 660,000 and 1.1 million adult fish annually including chinook, coho, pink and chum salmon. Today, the once abundant Klamath salmon runs have been reduced to less than ten percent of their historic size, due to poor water quality, low water flows, and habitat loss.

The beneficial uses designated for the Klamath River include marine habitat. Maintaining beneficial uses for marine habitat requires high water quality standards since fisheries tend to be extremely sensitive to water quality changes. Disease outbreaks exacerbated by poor water quality conditions are cited by the State of California Regional Water Quality Control Board as causing juvenile and adult fish kills in the Klamath River. (See *Executive Officer's Summary Report, 11.2, November 29, 2006*).

STEWARDS OF THE FISHERIES

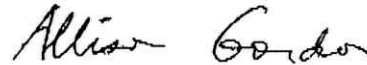
1

PCFFA opposes the Regional Board staff's proposal to delist the Wooley Creek segment of the Klamath River as impaired for water temperature. The Salmon River Restoration Council has monitored temperatures in Wooley Creek and found temperatures often exceeding 72 degrees. All fish parasites are more biologically active in warmer water than in cold. Warm water is also highly stressful to cold-water salmon in the river, and causes them to become more vulnerable to disease and parasites.

In the Russian River Watershed and Humboldt Bay Watershed, PCFFA supports listing water segments for impairment due to indicator bacteria, dissolved oxygen, microcystin toxin, DDE, and DDT. Dissolved oxygen impairment threatens marine life. Without enough oxygen in the water, fish will suffocate.

The Regional Board is strongly urged to take action by listing the impaired water bodies and implementing aggressive Total Maximum Daily Loads to remedy the impairments. PCFFA respectfully requests your support of the proposed additions to the 2008 303(d) List of Impaired Waters and your opposition of delisting Wooley Creek as impaired for water temperature.

Sincerely,



Allison Gordon
Legal Analyst