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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

NOV 5 1998

F/SWO31:EJS

Dear Santa Ynez River Consensus Committee Members:

Thank you for the opportunity to provide comment on the internal review draft of the Santa Ynez Fish Management Plan. National Marine Fisheries Service understands that the plan, when finalized, will be used during the State Water Resources Control Board's hearings in 2000 as the proposal for managing fishery resources in the Santa Ynez River. Some of the items in the internal review draft involve issues that the U. S. Bureau of Reclamation (BOR) is consulting on with NMFS under section 7 of the United States Endangered Species Act. Because these issues (conjunctive use of water rights, fish reserve account, Hilton Creek enhancement, fish rescue) involve the 1999 operations of the Cachuma Project, NMFS will be carefully reviewing them in detail with the BOR.

NMFS would like to offer some preliminary comment on the above proposed actions in the internal review draft and the other proposed actions. Many of these actions have appeared in prior drafts reviewed by NMFS. Changes and adjustments have been made in the draft and NMFS would like to continue to provide input. Actions not involving 1999 Cachuma operations include direct recharge of groundwater basins at alternate release points, public education and outreach, fishing moratorium, southern steelhead supplementation, downstream passage for out migrating juveniles from the upper basin, mainstem passage barrier removal, mainstem habitat enhancement and protection, tributary passage barrier removal, and tributary enhancement and protection. Several of these actions could be of benefit to steelhead in the Santa Ynez. We encourage their further development. Our comments are as follows:

General:

As noted in our December 5, 1997, letter, it is unclear what measurable management objectives the plan uses to chose actions and how the plan will determine the success of its measures for the steelhead population in the Santa Ynez. It is unclear if an overall watershed assessment has been done to determine the most beneficial combination of enhancement projects and actions. Adaptive management and monitoring strategies do not appear to have been specifically developed.

Conjunctive use of water rights releases and fish reserve account:

NMFS believes that substantial gains for steelhead could occur through conjunctive use. However, the biological basis for specific flow targets does not appear to be well developed. In addition, specific ramping schedules will need to be described and evaluated. Both of these issues, and others, should be evaluated based in part on steelhead life history needs.



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Hilton Creek Enhancement:

NMFS believes that the supplemental watering system currently being constructed on Hilton Creek will provide substantial benefits to Hilton Creek steelhead. We are concerned that if the planned pump is not installed, the system will only be able to operate 60% of the time.

NMFS does not have enough information to evaluate the proposed channel extension to Hilton Creek. Attractant flows for migrating steelhead, operation of the bypass structure, and channel maintenance needs are among the issues that need further development. The channel extension could be beneficial, but might also impede steelhead access to known good quality habitat.

The proposal to modify a natural passage impediment in Hilton Creek also does not contain enough information for evaluation. While modification could increase the availability of upstream habitat, other passage barriers remain. In addition, direct modification of the chute area might result in head cutting, further destabilizing habitat areas.

Fish rescues:

NMFS believes that fish rescues may be necessary during severe droughts. The process outlined in the internal review draft represents a well developed starting point for further refinement of this proposed action.

Direct recharge of groundwater basins at alternate release points:

NMFS can not evaluate this alternative based on the information provided in this and other Santa Ynez River documents. While there may be benefits for migrating steelhead, these benefits could also be offset by a loss of water for rearing fish higher in the system. NMFS suggests that specifics be developed for this alternative that will allow tradeoffs with respect to fish resources and other concerns to be fully evaluated.

Public education and outreach:

NMFS supports efforts at public education and outreach. Hopefully, voluntary efforts will provide extensive benefits to steelhead and steelhead habitat in the Santa Ynez River. It is difficult to predict the success of such efforts however.

Fishing moratorium:

As noted in the internal review document, the California Fish and Game Commission banned all fishing in anadromous streams in their Southern California Sports Fishing District in August of 1998. This includes the Santa Ynez River below Bradbury Dam. NMFS has supported this action and believes it sufficiently protects steelhead from fishing if adequately enforced.

Southern steelhead supplementation:

It is unclear from the description of this proposed action how stocking streams above Bradbury dam with steelhead/rainbow trout from the population above the dam would benefit the native steelhead in the lower Santa Ynez River. It is unclear if native steelhead can be located above

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the dam, as both CDFG and the U.S. Forest Service have planted non-native hatchery fish in the watershed above the dam for many years. Fish spilling over the dam may compete with native steelhead in the lower Santa Ynez, reducing their chance of survival.

Downstream passage for out migrating juveniles from the upper basin:

This action is not developed enough for NMFS to evaluate it. The degree to which the number of returning adults is a limiting factor in the lower Santa Ynez is unclear. Increasing the number of adults may not improve the steelhead population unless other steps are taken to better provide for other steelhead life history stages. Moreover, the degree to which returning adults would actually be increased is also unclear. NMFS's experiences with trapping and trucking in other areas of the West have not met expectations. Finally, how would downstream migrants intending to smolt be distinguished from fish moving downstream as part of a localized habitat preference change? Non-anadromous fish from the upper basin would compete with the steelhead in the lower river, potentially reducing their chance of survival.

NMFS believes that trapping/trucking proposals are best integrated into Santa Ynez fish management after other options have been fully implemented and their success evaluated. Such proposals need to be carefully assessed for feasibility and long term benefits and costs.

Mainstem passage barrier removal:

This section mentions man made barriers but does not describe any that may exist. NMFS does not believe that dense growths of willow and other riparian vegetation impede steelhead passage in the Santa Ynez. It is likely that they are beneficial to steelhead. Beaver dams may or may not impede migration. Removal of beaver dams must be clearly justified as necessary for protection of an endangered species.

Mainstem habitat enhancement and protection:

NMFS is not opposed to structural enhancement of habitat for steelhead in general. However, the fragile nature of the steelhead resource in the Santa Ynez does not leave much room for projects which might have unknown or detrimental effects. Great care must be taken in changing the characteristics of current steelhead habitat. NMFS would support a staged approach that carefully evaluates costs and benefits of enhancing a small portion of habitat before expanding the program. Evaluation of structural enhancement should be part of a larger assessment process that examines all actions that may benefit steelhead and steelhead habitat, compares costs and benefits, and seeks to determine the best combination of actions.

Tributary passage barrier removal:

NMFS is supportive of passage barrier removal where steelhead migration is blocked or impeded. Non-natural barriers and impediments to steelhead migration may adversely affect steelhead and result in take.

Tributary enhancement and protection:

NMFS is supportive of habitat protection along tributaries to the Santa Ynez through

conservation easements and other mechanisms. NMFS would like to work with local landowners and governments to provide the means to insure steelhead habitat protection and assurances to landowners that they have met the requirements of the Endangered Species Act. Voluntary programs have the potential to benefit steelhead but their ultimate outcome is difficult to measure. For this reason, evaluation of this component in terms of the overall level of steelhead habitat protection provided by the plan is very difficult.

NMFS is supportive of habitat enhancement where benefits can be demonstrated. NMFS is more supportive of enhancing marginal habitat than trying to further improve important areas of good quality habitat. This is due to the inherent risk of failure in certain habitat enhancement activities.

Please contact Mr. Eric Shott (562) 980-4026 if you would like additional information.

Sincerely,



William T. Hogarth, Ph.D.
Regional Administrator