

DRAFT SALMON ADVISORY SUBPANEL COMMENTS ON THE SALMON TECHNICAL TEAM'S SACRAMENTO RIVER FALL CHINOOK OVERFISHING ASSESSMENT

While the Salmon Advisory Subpanel (SAS) appreciates the Salmon Technical Team's (STT) efforts to do a factor analysis of the Sacramento River fall Chinook (SRFC) crash, we do not believe that poor ocean conditions were a proximate cause of the crash of SRFC brood years 2004-2007. Some of us were on the ocean in that area at that time. We have all seen far worse conditions which salmon survived far better. In particular, while krill were scarce, anchovies and sardines were abundant. We know that a juvenile salmon will eat baitfish. Pointing to ocean conditions as the major cause, absent stronger evidence, serves the interests of those who care nothing about salmon and does no good for those of us who want salmon to thrive.

We agree with the observation that the need to truck hatchery fish past the delta indicates that the delta is unsuitable for juvenile salmon. We agree with the Biological Opinion on Delta Operations conclusion that continuing status quo delta operations will cause extinction of Central Valley (CV) anadromous fish. We agree with the State Water Quality Control Board analysis that survival of delta fisheries require halving of delta exports. We strongly urge the Council to seek continuing dialogue with the Bureau of Reclamation and Department of Water Resources concerning the effects of Central Valley operations on SRFC.

We note that, while hatchery fish are trucked past the delta, it's still 33 miles from Mare Island to the ocean.

We agree with the conclusion that SRFC were not overfished, especially since no fishing occurred in two of the three years of concern.

The SAS agrees with Lindley's finding that homogeneity among CV stocks may have contributed to the crash. We support Habitat Committee's (HC) call for increased scrutiny of the performance of CV stocks that aren't trucked, don't support their call for a separate conservation objective.

Finally, regarding the National Marine Fisheries Service (NMFS) recommendations cited in the HC report concerning the screens at the delta pump: According to the Biological Opinion, over 90 percent of entrained salmon are lost to predation before they reach the screens. Why not move the screens to the main points of diversion from the Sacramento mainstem? The Biological Opinion says fish that stay in the mainstem survive far better than fish that enter the delta.