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STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, Governor

## DEPARTMENT OF FISH AND GAME

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#12

January 16, 1997

Mr. Chuck Hanson  
 Hanson Environmental, Inc.  
 132 Cottage Lane  
 Walnut Creek, California 94595

EXHIBIT CT 28-B

Dear Mr. Hanson:

**Comments on December 2, 1996 Revised Draft of Santa Ynez River Report**

The Department of Fish and Game has reviewed the December 2, 1996 Revised Draft of Santa Ynez River Report. Previous Department comment letters were provided October 21, and November 18, 1996. Our comments on the December revised draft follow.

GENERAL COMMENTS

The Department strongly disagrees with two recommendations under Section 6.3, *Recommendations for Further Investigation*. These are to defer data collection and modeling efforts for habitat-flow relationships (page 6-28, last bullet) and temperature (page 6-33, second bullet). Modeling of habitat-flow relationships and temperature are identified as Jobs 3 and 5, respectively, in the long-term study plan which has been approved and incorporated into the 1996 Memorandum of Understanding as "Exhibit A." The Department believes efforts to resolve technical issues should commence immediately as opposed to deferring action until a later date, and recommends the Technical Advisory Committee (TAC) Study Coordinator proceed with scoping all jobs, activities, and procedures identified in the long-term-study plan, including jobs 3 and 4.

As stated in our November 18, 1996 comment letter, changes in the long-term study plan should only be made if an equal or improved alternative for information collection is included. As no substitutes have been proposed, use of modeling for both habitat-flow relationships and temperature must be included.

When access to private property to conduct Job 1 data collection activities was denied to Santa Ynez River TAC biologists in July of last year, the Biology Subcommittee determined that a more broad based, systematic approach to the access issue was necessary. The Subcommittee followed with a July 11, 1996 memorandum to the TAC which stated "Additional work is required in this area and without the inclusion of the Crawford section, it is doubtful that most of

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**Page 6-36, Job 6. Verification of Habitat-Flow Relationships**

This section should clarify that the objective of Job 6 is to empirically verify modeled flow versus habitat relationships identified for target fish species/life stages under Job 3, and modeled temperature conditions under Job 4.

**Page 6-37, third paragraph**

It should be stated that determining whether rainbow trout/steelhead inhabiting the Santa Ynez River represent a resident or anadromous stock is not an over-riding issue to the Department as we believe that native resident and anadromous rainbow trout form a single interbreeding population in river systems where they coexist, thus management should be focused on restoration of habitat conditions that support all life histories that may be necessary to the long-term persistence of the population.

**Page 6-39, Job 10: Identification and Evaluation of Potential Short- and Long- Term Management Actions**

"Management actions will be designed within the overall context of water availability and project operating constraints to maintain, protect, and improve habitat conditions for fisheries and public trust resources. The identification and evaluation of potential management actions would also be considered in context with the general guidelines for protection and enhancement of steelhead developed by GDF and G (McEwan and Jackson, 1996)."

The Department's recommendation is for the TAC Study Coordinator to rigorously pursue access negotiations, through the permittee, and with private landowners, and to move forward with all components of the long-term study plan, including the collection of habitat/flow and temperature data, as soon as possible. Long-term plan study results are necessary to produce the information necessary to develop flow and management recommendations for sustaining and restoring aquatic resources on the Santa Ynez River, including steelhead trout.

Please contact me at telephone (916) 653-4875 if you have any questions regarding this letter.

COPY ORIGINAL SIGNED BY  
 JOHN L. TURNER

John Turner, Chief  
 Environmental Services Division

*Passage*

Attachment

cc: See next page.