



FOOTHILLS WATER NETWORK

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Re: Comment on PCWA Middle Fork American Project #2079
Fish Passage Study Results

April 9, 2009

Dear Mal Toy and PCWA,

PCWA has released its Fish Passage Study results for comment due on April 17, 2009.

The Foothills Water Network respectfully submits the following comments on the Fish Passage Study results.

It has come to our attention that there is an *Onchorhynchus mykiss* population, which has been seen fighting over redds in the wintertime between December and February in the Middle Fork American River reaches impacted by the PCWA Project. Unfortunately, it was an oversight that these fish were not identified as a target species in the Fish Passage, Fish Population, and IFIM Studies.

The Fish Passage Study should have included as a target species these remnant steelhead winter spawning rainbow trout. Given that it did not, we are requesting that PCWA identify the winter spawning rainbow trout as an existing resource impacted by their Project. Since we do not have Habitat Suitability Curves for these rainbow trout, we will see if we can rely on the brown trout Habitat Suitability Curves be used as a surrogate for these winter spawning rainbow trout. We would like to consider this species when we discuss PM&Es that will avoid negatively impacting these fish.

It is unclear at this time whether this is a hatchery or wild population has been impacted by hatchery plantings but we have not seen any studies that question the genetic purity of the strain. It is also unclear whether these rainbow trout are self-sustaining or where their spawning beds and migration patterns are located. There are a number of hypotheses and theories held by the licensee and other relicensing participants regarding these fish but we would need a study to clarify these lingering questions. It is PCWA's responsibility to prove the population is hatchery supported or err in favor that it is a wild strain and manage it accordingly. We are simply requesting that the licensee identify the existence of this winter spawning rainbow trout as a resource that we will consider in the PM&E discussions.

Ideally, these fish would have been included as a target species in the IFIM, Fish Population Studies as well as the Fish Passage Studies.

If PCWA thinks there are not any rainbow trout spawning at this time or have other questions about their spawning and genetics then they should conduct a study.

Thank you for taking this comment into account.

Sincerely,

Julie Leimbach, Coordinator
Foothills Water Network

Foothills Water Network Middle Fork Working Group

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Dave Steindorf, American Whitewater

Nate Rangel, California Outdoors and California Hydropower Reform Coalition

Gary Estes, Protect American River Canyons

Gary Flanagan, Federation of Flyfishers

Bill Center, American River Recreation Association

John Donovan, Private Boater

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