

MIDDLE FORK AMERICAN RIVER HYDROELECTRIC PROJECT RELICENSING
FOOTHILLS ANGLER INTEREST STATEMENT



FEBRUARY 11, 2010

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1.0 EXECUTIVE SUMMARY

The following executive summary is applicable to all reaches of the Middle Fork of the American River (MFAR):

- Our collective position is that all MFAR fisheries need to be **enhanced**, not just maintained in their present status. The comments and points identified below reflect the critical need to enhance and restore the MFAR fishery to its prior level of healthy and sustainable fish populations. It is important to note that long-time, experienced MFAR recreational anglers have observed a significant and steady decline in the overall health and populations of the MFAR fisheries to a degree that the future sustainability of this valuable recreational resource comes into question. Clearly, this is a critical and high priority problem that needs to be addressed in this FERC relicensing process.
- As recreational stakeholders, we believe that a holistic approach to establishing environmentally sound flow levels, taking into account all of the habitat suitability criteria set forth in the study report, is the only proper and appropriate methodology. In other words, all MFAR flows should, based on sound scientific processes, address the needs of RBT (spawning, rearing, fry, juvenile, adult) and the needs of BMI populations (wetted perimeter), in terms of appropriate water levels, water temperatures, appropriate velocities, ramp rates, etc.
- As stakeholders, we are committed to working with other affected groups to reach accommodations that will harmonize all interests, in a manner that is science-based and to the extent reasonably possible.
- As stakeholders, we are committed to working with PCWA and appropriate state and federal agencies to ensure the successful reintroduction of anadromous fish species (specifically the California central valley steelhead) back into the MFAR as a condition of the MFAR relicensing.
- Minimum flows for the MFAR, including flows during dry years, need to be subject to a minimum flow level that will also serve as a baseline to optimize the “habitat suitability criteria” delineated in the instream flow technical study report
- Flows during various periods of the year need to reflect the data summarized in the periodicity chart depicted in Figure AQ 1-2
- “Flushing” or “pulse” flows are needed during spring months (to reflect the unimpaired hydrograph), consistent with RBT spawning needs, and in order to contain and maintain riparian vegetation necessary for food web sustainability and for the general health of the MFAR.
- Flows must be sufficient to maintain constant wetted perimeter for consistent BMI production. High flows that result in the destructive drift and removal/relocation of the BMI population are exceedingly damaging to the MFAR’s food web, and should be avoided during the prime forage months for this fishery.
- For Brown Trout spawning purposes (October through December), minimum flows during the outage period need to be sufficient to ensure that fish stranding and depredation due to side and main channel dewatering do not occur in any section of the MFAR.

2.0 BYPASS REACH INTRODUCTION AND GENERAL COMMENTS

Bill Carnazzo’s comments and those of the Foothills Water Network on the draft Rec-4 Recreation Study document are incorporated here by reference, and should be considered to be part of this document as background. The main purpose of this document is to provide accurate information regarding angling on the streams of the bypass reach, from those individuals who regularly fish those streams, and who are intimately familiar with their topography, stream access points, their fish, their aquatic insect species and populations, their streamside vegetation, and the flow regimes that produce the best opportunities for angling.

Table 1. below, represents a very general array of MFP bypass stream fishing conditions under the different broad flow categories as noted on the left side, from an angler’s perspective, vs. five general angler success levels arrayed across the top of the chart. The success assignments (“X”) for the flow types assume a competent, experienced angler familiar with fishing techniques appropriate to each of the 6 broad flow categories.

Table 1. Bypass Stream Fishing Conditions

Flow Conditions	Very Good	Good	Fair	Difficult and/or Unsafe	Poor or Unethical
Very High Flow/Heavy Turbidity				X	
High Flow, Some Turbidity		X			
High Flow, Clear Water		X			
Moderate Flow, Clear Water	X				
Low Flow, Clear Water			X		
Very Low Flow, Clear Water					X

2.1 BYPASS REACH GENERAL AND SPECIFIC POINTS BASED ON THE DATA SET FORTH IN THE AQ-1 TSR

Before going into specifics, some general constructs relating to this document:

- Our position is that the bypass reach fisheries need to be **enhanced**, not just maintained in their present status; our comments and points set out below reflect that position. As long-time bypass reach anglers, we have observed a significant decline in the health of the fisheries; that problem needs to be addressed in a methodical, structured manner
- We believe that a holistic approach to establishing environmentally sound flow levels, taking into account all of the habitat suitability criteria set forth in the study report, is the only proper methodology. In other words, flows should, to the extent reasonable, address the needs of RBT (spawning, rearing, fry, juvenile, adult), the needs of BMI populations (wetted perimeter), the needs of FYLF, appropriate water temperatures, appropriate velocities, etc.
- While we recognize that there are species other than fish and BMI whose needs should be addressed (e.g., FYLF), we believe that our proposals are sufficiently flexible to address those needs
- We are committed to working with other affected groups to reach accommodations that will harmonize all interests to the extent reasonably possible

2.2 BYPASS REACH GENERAL POINTS RELATING TO TROUT

- In order to improve the fisheries and restore them to their pre-project status, minimum flows for each bypass reach, including flows during dry years, need to be increased as a baseline to optimize for the “habitat suitability criteria” delineated in the study report (Appendix A)
- Flows during various periods of the year need to reflect the data summarized in the periodicity chart depicted in Figure AQ 1-2
- “Flushing” or “pulse” flows are needed during spring months (to reflect the unimpaired spring hydrograph), consistent with RBT spawning needs, in order to contain and maintain riparian vegetation for angler access purposes and general stream health
- Over the years since the MFA project was constructed, we have observed a persistent decline in BMI numbers and diversity; this, in turn, has caused damage to the fisheries. Flows must be sufficient to maintain constant wetted perimeter for consistent BMI production (see study text, pages 18-19; page 32, last paragraph; page 35, 2nd full paragraph; and Appendix M)
- For Brown Trout spawning purposes (October through December), flows during the outage period need to be distributed between the Rubicon and MFA in accordance with a ratio (percentage) that reflects the natural hydrographs of the two rivers for this period
- While we appreciate PCWA’s policy decision to stop diversions from Duncan Creek and the North and South Forks of Long Canyon Creek on June 30th, we believe that diversions should cease no later than May 31st in order to minimize fish entrainment in diversion facilities, provide additional water for fish downstream of the diversion to grow and thrive following post-spawn emergence, and so that the BMI population can increase by providing additional habitat.

Table 2. Instream Flows—Current and Revised Current Minimum Flow Standards

Flow Conditions	Current FERC Minimum (cfs)
Duncan Creek	4, 8
N.L. Canyon	2 or nat
S.L. Canyon	2.5, 5
L. Canyon	2.5, 5
MFA 44.7	4, 8
MFA 36.2	4, 8
MFA 26.2	12, 23
Rub. 25.7 dry	10cfs-6/1 to 10/14 & 6cfs-10/15 to 5/31
Rub. 25.7 wet	20cfs-5/15 to 12/14 & 10cfs-12/15 to 5/14
Rub. 20.9	Depends on upstream rls.
Rub. 3.5	Depends on upstream rls.

Table 2. Notes:

1. Minimum flows taken from Table AQ 1-10
2. Duncan Creek flow is below diversion
3. South and North forks of Long Canyon Creek flows are below diversions
4. Long Canyon Creek flow is below confluence of north and south forks

3.0 PEAKING REACH INTRODUCTION AND GENERAL COMMENTS

Tom Bartos' comments, on behalf of the Horseshoe Bar Fish and Game Preserve, on the draft Rec-2 Recreation Study document, are incorporated here by reference, and should be considered to be part of this document as background.

The purpose of this document is to further clarify the angler's interest statement for the MFAR peaking reach, and also to provide accurate information regarding angling on the streams of the peaking reach. The following information is derived from those individuals, stakeholders, biologists and subject matter experts who regularly fish those streams, and who are intimately familiar with the MFAR peaking reach. This information specifically details their collective knowledge and experience as it relates to the MFAR's peaking reach topography, stream access points, fish species, aquatic insect species and populations, riparian vegetation, and the flow regimes that produce the best opportunities for recreational angling opportunities.

3.1 PEAKING REACH FLOW CONDITIONS AND FLOW RAMP RATES

The Table below represents a typical array of MFAR peaking reach flow conditions under a full spectrum of typical flow categories, as identified in the column on the left side of the Table. The values listed on the top row of the Table (from left to right), identifies a range of desirable (or undesirable) angling conditions that are directly related to a specific flow condition. These adjective ratings represent recreational flow suitability from a recreational angler's perspective. The success and/or desirability allocation (identified by an "X" in their respective column) for each of the flow condition assume a competent, experienced angler familiar with fishing techniques appropriate to each of the typical flow categories.

Table 3. MFAR Peaking Reach Flow Conditions

Flow Conditions	Very Good	Good	Fair	Difficult and/or Unsafe	Poor or Adverse
Very High Flow				X	X
High Flow					X
Moderate Flow		X			
Low Flow	X				

The Table below, similar to the preceding Table, represents a typical array of MFAR peaking reach flow ramp rates that are typically present, as identified in the column on the left side of the Table. The values listed on the top row of the Table (from left to right), identifies a range of desirable (or undesirable) angling conditions that are directly related to a specific ramp rate condition. These adjective ratings represent the recreational flow ramp rate suitability from a recreational angler's perspective. The success and/or desirability allocation (identified by an "X" in their respective column) for each of the flow ramp rate condition assume a competent, experienced angler familiar with fishing techniques appropriate to each of the typical ramp rate categories.

Table 4. MFAR Peaking Reach Ramp Rates

Ramp Rates	Very Good	Good	Fair	Difficult and/or Unsafe	Poor or Adverse
High Ramp Rates				X	X
Moderate Ramp Rates		X			
Low Ramp Rates	X				

In summary, the MFAR peaking reach provides the most appropriate and safe opportunities for recreational angling at moderate to low flow conditions that are accompanied by low to moderate ramp rates.

3.2 PEAKING REACH GENERAL AND SPECIFIC POINTS BASED ON THE DATA SET FORTH IN THE AQ-1 TSR

Before identifying specific MFAR peaking reach recreational angler interest points, some general constructs relating to this document are listed as follows:

- Our position is that the peaking reach fisheries need to be **enhanced**, not just maintained in their present status. The comments and points identified below reflect the critical need to enhance and restore the MFAR peaking reach fishery to its prior level of healthy and sustainable fish populations. It is important to note that long-time, experienced peaking reach recreational anglers have observed a significant and steady decline in the overall health and populations of the peaking reach fisheries to a degree that the future sustainability of this valuable recreational resource comes into question. Clearly, this is a critical and high priority problem that needs to be addressed in this FERC relicensing process.
- As recreational stakeholders, we believe that a holistic approach to establishing environmentally sound flow levels, taking into account all of the habitat suitability criteria set forth in the study report, is the only proper and appropriate methodology. In other words, MFAR peaking reach flows should, based on sound scientific processes, address the needs of RBT (spawning, rearing, fry, juvenile, adult) and the needs of BMI populations (wetted perimeter), in terms of appropriate water levels, appropriate velocities, ramp rates, etc.
- As stakeholders, we are committed to working with other affected groups to reach accommodations that will harmonize all interests, in a manner that is science-based and to the extent reasonably possible.
- As stakeholders, we are committed to working with PCWA and appropriate state and federal agencies to ensure the successful reintroduction of anadromous fish species (specifically the California coastal steelhead) into the MFAR peaking reach as a condition of the MFAR relicensing.

3.3 GENERAL POINTS RELATING TO TROUT SPECIES IN THE MFAR PEAKING REACH

- Minimum flows for the MFAR peaking reach, including flows during dry years, need to be subject to a minimum flow level that will also serve as a baseline to optimize the "habitat suitability criteria" delineated in the instream flow technical study report
- Flows during various periods of the year need to reflect the data summarized in the periodicity chart depicted in Figure AQ 1-2

- “Flushing” or “pulse” flows are needed during spring months (to reflect the unimpaired hydrograph), consistent with RBT spawning needs, and in order to contain and maintain riparian vegetation necessary for food web sustainability and for the general health of the peaking reach.
- Flows must be sufficient to maintain constant wetted perimeter for consistent BMI production. High flows that result in the catastrophic drift and removal/relocation of the BMI population are exceedingly damaging to the MFAR’s peaking reach food web, and should be avoided during the prime forage months for this fishery.
- For Brown Trout spawning purposes (October through December), minimum flows during the outage period need to be sufficient to ensure that fish stranding and depredation due to side and main channel dewatering do not occur in any section of the peaking reach.