

May 24, 2022

California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

RE: Low Flow Closures on the Eel River in Humboldt County

Dear Members of the Fish and Game Commission:

We are writing to you today with significant concerns about the proposed adoption of regulatory authority related to low flow closures on the Eel River estuary. We believe there are justifiable reasons for this section of the Eel River to be exempt from any low flow restrictions. The section of the river we are concerned about is from the mouth of the river to Fulmor Road, at its paved junction with the south bank of the Eel River.

While we understand and support the emergency low flow closures, we do not believe low flow closures in the stretch described above is warranted for the following reasons:

- Salmon conditions and habitat in this section of the Eel River is healthy
- This stretch of river is tidal influenced and drought conditions aren't prevalent
- Water temperatures are cool due to influx of sea water
- Adult wild salmon and steelhead are not confined to pools of cold water. The fish can go back out to the ocean if warm water conditions became evident
- The estuary is patrolled regularly by wardens reducing the effects of poaching
- The estuary is 7 miles long and holds too much water for snagging or illegal hooking to be an effective method
- Catch and release of Chinook Salmon is written in the Freshwater regulations

In a zoom meeting held April 13, 2022 and attended by the Humboldt County Fish and Game Advisory Commission (HCFGAC) several justifications were made to warrant inclusion of this stretch of the river among the low flow conditions. However, California Fish and Wildlife staff acknowledged that there is very little direct data on the Eel, and that many of the assumptions being made are via extrapolation from scientific studies on other watersheds.

We would like to bring this item to the Commission's attention and ask that they direct California Department of Fish and Wildlife and the Fish and Game Commission's staff to continue a dialogue with Humboldt County and the recreational angling community. We would also like to find alternatives rather than a closure starting September 1, 2022 when flows are below 350 cfs at the gauging station near Scotia that could result in a complete closure of the estuary fishery this year. We look forward to this discussion.

Sincerely,

Chair, Virginia Bass
Humboldt County Board of Supervisors