

Table 1. Public Comments on Proposed Regulatory Changes and Department Responses for the 2014 Inland Sport Fishing Regulations Review Cycle

Comment	Name of Commenter	Type/Date	Summary of Comments	Response
1	Walter Jorgensen	11/12/2014 e-mail	<ol style="list-style-type: none"> 1) Angler opportunity is being limited because of alleged harm to fish without actually measuring the impact. 2) The best available science used to base the low flow closures is data from the North Fork which is not a fishable stream. 3) CDFW proposed low flows are unnecessarily high and recommends 100 cfs for the Gualala River, 100-125 cfs for the Navarro River, and 200-250 cfs for the Russian River. 4) Region 3 regulations should mimic Region 1 such as multiple updates to the low-flow closure hotlines and estuaries that are left open to fishing. 	<ol style="list-style-type: none"> 1) CDFW received many calls and comments from concerned anglers about allowing angling during low-water conditions in the Russian River and the Gualala River. These anglers felt it was detrimental to steelhead populations and called for CDFW to take action to protect salmonids in the streams. However, the scientific literature indicates that there is a certain percentage of mortality associated with even catch and release fishing. Studies vary widely in their reported fishing mortality rate due to various factors such as gear, hooking location, wound extent, length of time played, handling and release technique, air exposure, physiological condition, water temperature, and other environmental factors. CDFW believes catch and release fishing mortality is generally low during normal flow conditions; however, under low-flow conditions fish are subject to increased environmental stress that could result in a much higher mortality rate. A caught and released fish may have a delayed mortality associated that the angler would not immediately observe. It was determined that changes to low-flow closure fishing regulations would be the best management strategy to address this situation. Low-flow conditions often impede migration of salmonids to their spawning grounds which makes them more susceptible to increased predation, disease, and environmental stress. 2) The determination of what flow level to use on the SF Gualala River gauge was

				<p>based partly on the North Gualala Water Company Site-Specific Studies Report. The results of this report and the analysis of hydrological data indicate that the fish passage into the NF Gualala River, lowest significant tributary, was at 60 cfs which corresponded to 150 cfs at the SF Gualala River gauge. The various suggestions on low-flow levels that CDFW received were evaluated to determine 1) how they met CDFW conservation objectives for protecting CESA and ESA listed salmonids and 2) how they impacted angling opportunity. Fish passage into spawning tributaries under low-flow conditions was an important factor in determining appropriate flow levels.</p> <p>3) Comment noted.</p> <p>4) Based upon suggestions that CDFW received, we are proposing that the regulation changes include Monday, Wednesday, and Friday updates to determine whether the streams will be open or closed to fishing based on low-flow conditions. Other suggestions were not included if they did not meet CDFW's conservation objectives to protect salmonids or were counter to the CDFW goals of regulation simplification and consistency.</p>
2	Jason Spangler	11/12/2014 e-mail with attached letter	<p>1) Disagrees with the CDFW proposal to base the low-flow closure on 150 cfs at the SF Gualala River gauge because three major tributaries (North Fork, Buckeye, and Rockpile) lie down stream of the South Fork gauge.</p> <p>2) There is not enough data to support that fish are not moving at flows under 150 cfs.</p> <p>3) If anglers aren't fishing there will be</p>	<p>1) The SF Gualala River gauge is the best gauge in the Gualala Watershed to use because it incorporates the flow of two large tributaries (SF Gualala and the Wheatfield Fork) of the Gualala River. The NF Gualala gauge only incorporates the flow of one major tributary.</p> <p>2) See comment 1, response 2.</p> <p>3) Comment noted.</p> <p>4) The issue of allowing estuaries to be open</p>

			<p>fewer eyes on the water to help report poaching.</p> <p>4) If 150 cfs is adopted, the mainstem Gualala River (below the confluence of the North Fork) should remain open for anglers.</p>	<p>during low-flow closures was not included because it did not meet CDFW's conservation objectives to protect salmonids because often in low water conditions salmonids reside in the estuary for an extended period because of insufficient flows to allow passage upstream. Providing estuary fishing further complicates fishing regulations and is not consistent with CDFW goals of regulation simplification and consistency.</p>
3	<p>Tim Frahm, Brendan Gertz, Paul Young, Ron Williams, Fritz, Eruno Nuvi, Earl Buchanon, Dan Garcia, Brion Moore, Ed Given, Dennis Stefani, Daniel Brown</p>	<p>11/12/2014 e-mail with attached letter signed by the commenters</p>	<p>1) Based upon angler experience these anglers strongly disagree with the CDFW low-flow closure proposal on the Gualala River because it is overly protective, unreasonable and not supported by field conditions or observation.</p> <p>2) 150 cfs is not consistent with other State required protective flow regimes on the Gualala.</p> <p>3) Low flow restrictions based on 150 cfs reduces opportunities to fish and challenges our ability to safely access fishing locations.</p> <p>4) Fly fishermen are uniquely impacted by this regulation.</p> <p>5) Catch and release with artificial lures and barbless hooks is not a threat to steelhead.</p> <p>6) If ethical fishermen are regulated off the water, poachers win and fish lose.</p> <p>7) Relying on the South Fork gauge is not sustainable.</p> <p>8) Recommend no summer/fall fishing.</p> <p>9) Recommend artificial lures and flies with barbless hooks after February 1 (similar to the Mattole River).</p> <p>10) Disagree with CDFW proposal to</p>	<p>1) Comment noted.</p> <p>2) The State Water Board permit # 14853 which requires a bypass flows of 40 cfs on the NF Gualala and State Water Board permit # 15358 which requires a bypass flow of 25 cfs are not for adult salmonid passage and not based on data reported in the recent North Gualala Water Company Site-Specific Studies Report.</p> <p>3) Comment noted.</p> <p>4) All fishermen will be impacted if a low-flow is triggered.</p> <p>5) See comment 1, response 1.</p> <p>6) Comment noted.</p> <p>7) The SF Gualala River gauge has been identified as the most appropriate gauge to use on the Marin-Sonoma coast. Due to its lack of major water diversion the Gualala River best mimics natural conditions of other coastal streams in Marin and Sonoma Counties.</p> <p>8) Comment noted.</p> <p>9) Comment noted.</p> <p>10) CDFW has received overwhelming demand for the three times a week updating of the low-flow closure hotline. This is the first comment received counter to these demands. Comment noted.</p>

			update low-flow closure hotline three times a week because it only benefits local fishermen. Out of town fishermen need a surety of at least a week's fishing.	
4	John Pogue	11/12/2014 e-mail	<ol style="list-style-type: none"> 1) North Fork data doesn't support the CDFW recommend flow since the North Fork is not fishable. 2) Feels fishery is not managed appropriately and lacks the necessary enforcement. 	<ol style="list-style-type: none"> 1) See comment 1, response 2. 2) Comment noted.
5	Larry Kenney	11/12/2014 In two e-mails	<ol style="list-style-type: none"> 1) The recommended low flow is too high and will impact fishing. 2) Restriction of angling is without scientific basis demonstrating the effects of angling. 3) The Gualala River is unfishable for fly anglers at 150 cfs. 4) The proposal doesn't take into account the North Fork flow since it is below the South Fork gauge. 5) Low-flow closure is supposed to make enforcement easier but the lack of anglers on the water increases opportunity for poaching. 6) Recommends 75-100 cfs for SF Gualala, 125-150 for Navarro River, 200-250 for the Russian River. 7) Recommends CDFW fund a study to determine impacts on CCC steelhead. 8) Low-flow hotline should be updated multiple times per week. 	<ol style="list-style-type: none"> 1) Comment noted. 2) See comment 1, response 1. 3) Comment noted. 4) See comment 1, response 2. 5) Comment noted. 6) Comment noted. 7) Comment noted. 8) See comment 1, response 4.
6	Ned Morris	11/12/2014 e-mail	<ol style="list-style-type: none"> 1) Agrees with the need for regulatory change but believe that flow levels are incorrectly set. 2) Requests that the CDFW phone line be updated more frequently. 3) Estuaries should be open to fishing during low-flow closures. 	<ol style="list-style-type: none"> 1) Comment noted. 2) See comment 1, response 4. 3) See comment 2, response 4.
7	Brad	11/12/2014	Recommends 100 cfs SF Gualala, 100 cfs	Comment noted.

		e-mail	Navarro River, and 200 cfs in the Russian River.	
8	Ryan Henderson	11/12/2014 e-mail	Recommends 100 cfs SF Gualala, 100 cfs Navarro River, and 200 cfs in the Russian River.	Comment noted.
9	Michael Le Febvrier	11/13/2014 e-mail	<ol style="list-style-type: none"> 1) Wants regulation changes that do not punish anglers. 2) Believes other issues are more important to protect fish. 3) Consider anglers point of view in decision. 	Comments noted.
10	Robert Minuzzo	11/13/2014 e-mail	Habitat restoration, vineyard expansion, and poaching are the problems that need to be addressed and not restricting sport anglers.	Comment noted.
11	Robert Johnson Jr.	11/14/2014 e-mail	<ol style="list-style-type: none"> 1) Recommends 100 cfs SF Gualala, 100-125 cfs Navarro River, and 200-250 cfs in the Russian River. 2) Proposes fly fishing only during low-flow closures because it is far less stressful on fish. 	Comments noted.
12	Dan Brown	11/14/2014 e-mail	<ol style="list-style-type: none"> 1) Recommends prohibiting bait solve the issue of fish being vulnerable to angling. 2) Recommend 50 cfs on the SF Gualala River. 3) Low-flow hotline needs to be updated on a timely basis to allow anglers to plan trips. 	<ol style="list-style-type: none"> 1) See comment 1, response 1. 2) A flow at this level would not meet CDFW's conservation objectives to protect salmonids. 3) See comment 1, response 4.
13	Fred Boniello	11/10/2014 e-mail	<ol style="list-style-type: none"> 1) Sport fishing and has never and will never have negative impact on migrating species. 2) Proposed regulation change will not allow sport fishing for shad, black bass, and other resident fish because of lower flows implemented in the spring, summer, and fall. 3) Proposes regulation to ban the use of bait in the central coast sport fishery. 	<ol style="list-style-type: none"> 1) See comment 1, response 1. 2) The proposed low-flow closure season is October 1 –April 30, and would only effect fishing under low flow conditions during that period. Sport fishing outside this period would be unaffected by this regulation. 3) Comment noted.
14	Fred Boniello	11/17/2014	1) Feels new low-flow closure regulations	1) Comment noted.

		e-mail	are unnecessary and impose hardship. 2) New low flow regulations will make it impossible to cross streams in higher and faster water conditions.	2) Comment noted.
15	Neil Light		1) Believes the Department did not use scientific data to support the proposed 150 cfs minimum flow on the Gualala River 2) Disagrees that fish won't move upstream when the riffles are one or two feet deep 3) Fly fishermen are disproportionately impacted by the 150 minimum flow requirement on the Gualala River 4) Feels the problem isn't anglers but the lack of enforcement 5) Questions what the Department is trying to protect when it's a catch and release fishery and incidental hook mortality is extremely low. 6) Recommends 35 cfs on the Gualala River, 25 cfs on the Garcia River, and 200 CFS on the Russian River 7) Recommends closing the Gualala River during low flow periods only above the North Fork 8) Recommends closing the Garcia during low flow periods above the Hwy 1 bridge only	1) See comment 1, response 2. 2) Comment noted. 3) See comment 3, response 4. 4) Comment noted. 5) See comment 1, response 1. 6) Comment noted. 7) See comment 2, response 4. 8) Comment noted.
16	Sonoma County Water Agency	11/20/2014 letter	SCWA supports the Department's proposed low-flow fishing restriction on the Russian River.	Support noted.
17	NOAA Fisheries	11/17/2014 letter	NOAA Fisheries supports the Department's proposed low-flow changes on the central coast streams.	Support noted.
18	Paul Weakland	12/03/2014 In person at Commission meeting	1) Requests that the Department allow harvest of abalone in S.F., San Mateo, Santa Cruz, Monterey, and San Luis Obispo counties 2) Feels there should be a size limit for	The Department is not recommending changes to ocean sport fishing regulations as part of this regulation package.

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