

FINNY FACTS

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San Diego



Fly Fishers

Cleaner Water. Brighter Streams. Better Fishing.

Volume 10, No. 2

February Speaker

Smith, Blackfoot, and Missouri Rivers Spotlight for February Meeting

Trapper Badovinac of Helena Montana, who has been published in both *Southwest Fly Fishing* and *Northwest Fly Fishing*, both outstanding publications will be our February speaker. He will be presenting a short visual tour of the Smith River, the Blackfoot River and small streams in the Blackfoot drainage followed by an extensive review of the Blue Ribbon Section of the Missouri River, from top to bottom. He will cover seasons, hatches, presentation, rigging, nymphing, dry fly presentation and much more. At the end of

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MEETING NOTICE

Monday, February 7th, 2005

7:30 PM

Sequoia Elementary School

4690 Limerick Ave.

(See map on back page)

REMINDER

Volunteer hosts for this meeting
(report at 6:15 PM):

**Jonathan Riley and
Jim Gottfried**

Thank you, Mona Morebello

Trip to Eagle Lake Reaps Big Rewards

Trip ends quite differently than planned--but in a positive way



Al Nacke

Like many great trips, our Eagle Lake adventure came about quite by accident. My long time fishing partner, Bill Patterson, who I met at the US Air Force Academy 35 years ago (and who now resides in Livermore, CA) convinced me to come visit him and fish the famed “can’t miss” monster trout waters of Butt Valley Reservoir – a few miles south of Lake Almanor – which is about 75 miles east of Red Bluff – which is about 200 miles north of Livermore – which is only 2000 miles from my home near Atlanta ... so I said, “Why not?”

Before leaving, I spent a couple weeks reverse-engineering and “tying” some “special flies” Bill got from his perverted neighbor. I wasn’t very proud of what I did; I actually had to CARVE little disfigured minnows out

of balsa wood (I now fancy myself the Gipetto of fly carving). I can live with myself, though ... I’ve midged at Crowley and actually referred to a bright overpriced fluorescent Styrofoam bobber as a “strike indicator.”

Butt Valley Reservoir – we put in and attempted float tubing a little below the power generation plant. We kicked ... we kicked ... and we kicked some more ... then they cranked the power up. I got blasted well into the main lake and still couldn’t come close to holding my own. Bill got into an eddy and faired a little better (not fishing-wise, of course ... I’m just talking about trying to sustain life in the float tube). I kicked to the shore, put my float tube on my head, tail between my legs, and hiked back to the car. All that for a 20 inch trout ... or more accurately, a classified number of trout which totaled 20 inches. Off to float tube somewhere else, anywhere else – maybe the Colorado River in the Grand Canyon – at least it would be exciting.

Lake Manzanita in Lassen National Forest seemed to fit the bill. Small, no current, no wind, and as it turned out, no way to blow up my float tube. I had lost the critical coupling that hooks

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What a great meeting we had to start off the New Year!

After a quiet moment of reflection for dear departed friends **Bob Camp** and **Ron Sharpe**, we forged ahead with **Gary Hilbers** signing up volunteers for the Lake Chollas Star/Pal Kid's Fishing Derby. This will be held on February 12th at Lake Chollas, with a rod prep session on Friday February 11th.

This derby is one of the highlights of the year for the club. If you are looking for a fun and inspirational time, try this event. Where else can you enjoy giving out free fishing rods to surprised and delighted kids?

Gary and **Dick Mount** have been manning the lend-a-rod station on Sundays at Lake Chollas. They would love to have club members lend a hand from 10 until 2 every Sunday.

Also remember that we have casting lessons from 9 to 11 at Lake Murray. Come on over! If you don't feel like casting, this is the time to catch up with old friends and hear the latest hot fishing rumors... Psst... (the trout are hitting in our local city lakes and the bonito are still biting offshore).

Dick Mount received a well-deserved fly plate for his volunteer work for the club. He is also leading a weekend trip to Bishop in early March. This is a great time to fish the Lower Owens



LOUIE ZIMM

River while flows are still low, before the general trout opening.

Jack Bentley is once again leading our annual trout pilgrimage to the Green River in May. Contact Jack to sign up for fishing at one of the best tail-water fisheries in the west.

On the subject of fishing trips, one of the Sallery Lodge two-for-one offers has been secured by a good bid on Monday night. The other offer, from July 3rd to July 9th is still open. The club needs to inform the lodge whether we can use the spot by the last week in January. Don't let this opportunity to benefit the club and grab a great deal pass by. You can call me at for more info.

We also have openings for Silver Salmon fishing at Sallery Lodge on September 11th. This trip will cost the full \$2,250 (excluding airfare) per person.

Those of you that receive both written and electronic copies of the Finny Facts, please review your needs for this year. We all want to save our fish by cutting back on pulp mill effluent by saving paper.

It was appropriate that our speaker for

the evening, **Conway Bowman**, was present to see his dear friends **Eileen and Bill Stroud** receive a standing ovation and a plaque, listing recipients of the new Stroud award. **George Gates**, president emeritus, read their touching thank you to the club.

Conway Bowman was obviously energized by all the good will and presented a dynamite presentation on fishing for Mako Sharks on the fly off San Diego. We are very fortunate to have such wonderful fishing and fishing folks in our own city.

Tight lines and see you offshore and at Lake Murray!



Helen Grundler and Laura Collins at the Annual Flyfishers banquet.



FROM THE DESK OF THE CLUB BIOLOGIST

Here are some more articles from *North American Fisherman*:

Easement Planned Along Montana Rivers

The U.S. Fish & Wildlife Service plans to expand conservation easements through private lands in Montana

WASHINGTON, DC—The U.S. Fish & Wildlife Service (USFWS) recently proposed establishing a voluntary, incentive-based easement program to conserve fish and wildlife habitat on private land along the Rocky Mountain Front in north-central Montana. The program would involve purchasing conservation easements from willing owners whose lands provide important fish and wildlife habitat.



BOB WISNER

Williams. “Together, we realize that protecting important fish and wildlife habitat and maintaining working ranches go hand in hand. Conservation easements are an effective, proven approach to accomplishing both of these important objectives.”

The USFWS has already used its conservation easement program to conserve nearly 60,000 acres in the Blackfoot and Centennial Valleys of western Montana.

The Rocky Mountain Front, situated at the intersection of the western edge of

the northern Great Plains and the Rocky Mountains, has long been recognized as one of the nation’s most significant fish and wildlife areas. Under the proposed program, the USFWS would seek to purchase conservation easements from willing landowners west of state Hwy. 89 and north of Hwy. 200 to the Blackfeet Indian Reservation.

Conservation easements are voluntary legal agreements between landowners and government agencies (or qualified conservation organizations) that restrict the type and amount of development. USFWS easements like those envisioned for the Rocky Mountain Front, typically prohibit subdivision and development but generally allow for continued agricultural use.



Midday Panfish

It’s easy to find summer crappies and bluegills in and around deep weed edges early and late in the day. When the sun starts to penetrate deep into the water, however, this weed-related action usually slows. But the fish are still catchable—if you troll the right way in the right spots.

Midday weed-edge fishing dies because panfish move out to open water and suspend, feeding on zooplankton, freshwater shrimp and other suspended forage.

What constitutes “open water” varies depending on lake type. In fertile, bowlshaped lakes, open

water might be only a few feet deeper than the weedbeds that hold fish early and late in the day, but that’s enough to stop weed growth. In deep, clear lakes, panfish head to large bays where depths are less than 40 to 50 feet, not the deep main-lake basin.

I check these open-water areas with my sonar. I take it slow, though. I often find fish holding just five to 15 feet down, especially in shallow lakes, and running the outboard and letting the hull slap the surface spooks fish. Instead, I exclusively use the electric.

Troll in an S-pattern and vary your

speed until you find the right rate. Slowly sweeping the rod forward and then dropping it back often triggers strikes. And don’t forget to fish high in the water column. I have caught hundreds of crappies just two to three feet under the surface in dark, shallow lakes during midsummer.

No matter what species you’re targeting, the decision to troll is a no-brainer, in virtually any set of conditions. But the technique really works wonders in tricky situations where other methods would fail. When you approach these circumstances with tweaked trolling strategies, you’re sure to catch fish when no one else can.

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Trapper Badovinac

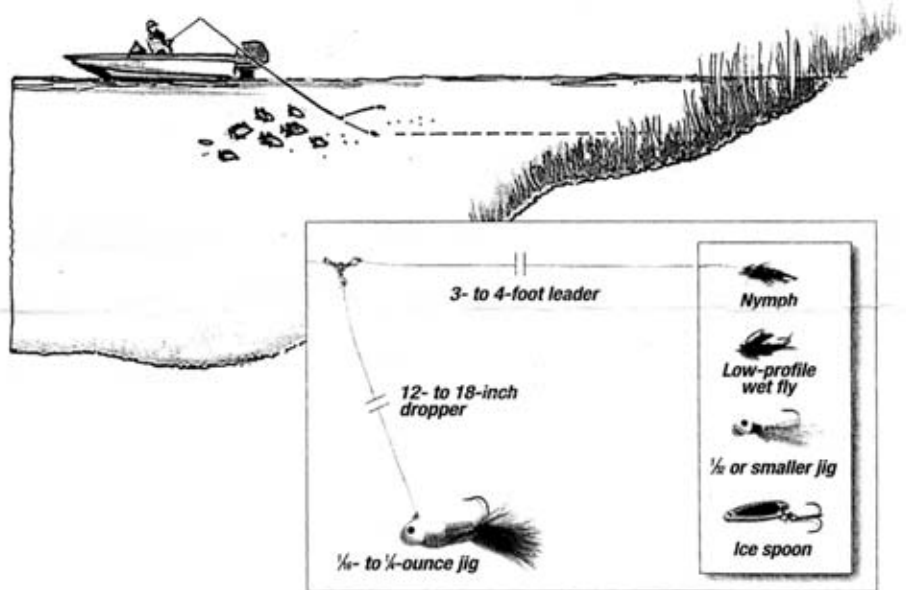
his presentation our members will have a much better understanding of these rivers, western tailwaters in general, and some fly fishing tips they can use on any water in the world. He will be doing a fly tying demo on a few of his proven patterns before the meeting. His presentation of tying tips is based upon tying 1,000's of dozens of flies commercially each year.

Trapper has guaranteed he will not give you a sales pitch with lots of photos of his clients holding really big fish, and tell us how great a guide he is. He will however let us know what we need to know about a river, how it should be fished, what works and when would be the better times to go. Much better than the "I could tell you where to go but then I would need to either charge you a big fee or kill you" approach we have seen on some occasions.

We look forward to a stimulating and informative presentation by Trapper.



Open-Water Panfish Rig



Where two-lure rigs are legal, Petros relies on this specialized trolling setup.

The front lure sets the depth and attracts active feeders; the rear lure goes for finesse. If fish are aggressive, tweak the rig to run two 1/16-ounce jigs, or a 1/4 ounce with an 1/8 ounce, so the productive speed/weight combination stays intact. If fish are finicky, replace the front lure with a smaller jig and keep a fly or small spoon on the long line. Add a split shot just above the swivel to maintain the proper running depth.

Keep the rig at or slightly above fish you see on your sonar. If you don't mark fish but believe they're nearby, troll the rig at the top depth of the nearest deep weed edge. For example, if a weedbed's fringe tops out six feet down, move to open water and start running the rig along that six-foot horizontal plane (panfish often stay at this level), then slowly run the rig deeper—usually to about nine feet down—until you find fish.



Maggie Merriman is Returning to the San Diego Fly Fishers

Maggie Merriman, a pioneer in fly fishing, will be returning to the San Diego Fly Fishers in March to present her acclaimed “Entomology” workshop.

Yes, this helps you figure out what the fish are eating, and “No Latin is needed”. She only speaks English.

The workshop will be one Saturday in March. The date and location are being finalized. Class sized will be limited. The fee will be \$45. If you have not had the opportunity to attend a presentation by Maggie, this is your opportunity. She is knowledgeable and enjoyable. We will provide more details at the February meeting.

Cal Trout Needs Volunteers

Rob Lusardi, the Cal Trout Manager for the Eastern Sierras has sent the following request for volunteers:

CalTrout will need volunteers on April 6-8th to help DFG electrofish Hot Creek, in an effort to assess trout and native populations. It is vital to get a good fish count this spring because DFG did not sample the creek last spring, and 2002 and 2003 numbers were down.

More details will be forwarded in February. Interested parties can get on an email list by contacting

Club Weekend Trip

Stay at Elms Motel in Bishop. Fish Owens River, check in Friday March 4th. Fish the 4th and 5th, check out on Sunday the 6th, fish and come home.

Thank you,
Dick Mount



Eagle Lake

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Bill with a beautiful Eagle Lake trout.

the float tube to the float tube blower-upper. On my tube (an Outcast) I tried using my mouth, but the hole was so big it was like giving artificial respiration to the blow hole of a whale. Then, an unbelievable event (unbelievable because it was GOOD) – the only other guy in the area drives up to launch his tube – and in the back of his truck he has no fewer than SIX of these couplings!! Before we knew it we were actually fishing ... and catching fish (all wild browns and rainbows 11-14 inches). Throughout most of the morning fish hit the surface – sometimes the action was constant, then it would slow down a little. It didn't seem to matter what we fished with – any small dry or emerger seemed to work well (Parachute Adams, Elk Hair Caddis, Baetis Cripples, Midges, Ants, sizes 16 to 22). It slowed down considerably during mid-afternoon, so, when the going gets tough, the tough get a beer.

Mr. "Coupler Man" in addition to making it possible for us to fish from float tubes that actually floated, also told us that if we wanted to catch lots of big fish, we had to go to Eagle Lake. I asked him if he was in any

way related to Mr. "Butt Valley Man." He assured us he was not, so away we went.

Bill and I knew absolutely zero about how to fish the lake, so, after scanning Eagle Lake carefully for structure, other fishermen, birds, points of land, etc. we fell back on our time-tested game plan ... go to the marina and throw money at the kid behind the counter. He

knew nothing about fishing but he did sell us some "Jay Fair" flies that actually worked (we had never heard of them before). Note – If you are interested in some of Jay's flies, and even a videotape of how he fishes the lake, this link will save you LOTS of time – for whatever reason, I could not find this site via Google. <http://www.eagleflyfishing.com>

At Eagle Lake we fished primarily

down at the south end of the lake (by the marina, just outside the jetty – at depths from 3 to 15 feet of water). A full sink line with a relatively short (6 to 8 ft) 4X Fluorocarbon leader worked well. We used one of Jay's creations as an attractor with a trailer 3 to 4 feet behind (small leaches in olive, brown, or black ... Hornbergs (or Loeberg variants) in olive, gray, or brown ... Wooly Buggers in olive, black, brown). Sometimes the trout would hit the attractor, sometimes the trailer – but most hits came when stripping in with a jerky motion (sometimes fast, sometimes slow). Rarely did we get hits while simply "kick-trolling." The fishing for us was best in the morning (about 9AM until 1PM or so). Many fishermen trolling from boats got limits before we even woke up. Day one I caught ten fish or so; the smallest was 19 inches and two were about 24 inches. The fish all fought very hard; some jumped, some dove – thank goodness for the heavy tippet. Bill, also, was having one of those amazing days ... with the

camera ... he got to film me catch exactly ten more fish than he caught.

So the next day Bill dragged me off to the tulies and mud at the north end of the lake ... under the auspices of fishing ... I suspect his real motive



Here's Al with one of many "lunker" Eagle Lake trout.



Eagle Lake

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was simply to give me the opportunity to see how he had felt the day before. It worked ... Bill actually caught a fish deep in the weeds; I caught zero – but I did get to help dig his jeep out of the cattails after he made an unbelievably poor attempt at turning around too close to the edge of the marsh – two hours later ... more beer.

Note: Good news though ... since returning from our trip, I have discovered that, supposedly, there really ARE a lot of big fish in the tulies at the north end of the lake. The bad news ... you have to know what the hell you're doing to catch them. If I could "refish" that day, I'd tackle the tulies with a floating line, a longer leader, and an unweighted leech – then I might at least have a chance in the shallow muck, goo, slime, and seaweed. If money was no object and I didn't actually believe I was the world's best fisherman, I might even suggest hiring Jay Fair for the day. And, as long as I'm getting to replay that day, I would also recapture two valuable fishing (or drinking) hours by preventing Bill from driving us INTO THE LAKE.

For accommodations, we used a VERY little tent I think Bill used as a cub scout. The first night it was very dark when we set up camp (on public land, we think). I have no idea where we were, but I would highly recommend this site if I could ever find it again. Feeling a little guilty, the next night we actually paid \$18 to set up the same little tent at a legal campground at the southwest end of the lake. Our campsite neighbor, Mr. "Urban Sprawl" set up next to us with his 200-ft Winebago/18-wheeler – complete with speakers, satellite dish, gourmet grill, hot tub, and electrical wires strung everywhere, no doubt sucking every living electron out of the Lassen



County power grid. Despite the blinding glow, we slept well that night basking in the warmth produced by his array of stadium flood lights. Oh, by the way, Mr. Urban Sprawl paid the same \$18 that we did ... back into the forest the next night for us.

The last day we went down around the jetty again. The weather was great; we each caught a number of trout 20+ inches in length – a super end to the trip. In 3 days, We NEVER caught a fish under 18 inches!

So, in conclusion, I recommend everyone in your San Diego club visit beautiful Butt Valley Reservoir at your earliest opportunity – big fish, lots of them, and you'll come back with an unbelievable set of quads and hamstrings.

See some of the flies used on this trip on the next page.

You might be wondering who is the author of this whacky trip report. This piece was written by

the brother of a fellow co-worker of mine, Bob Nacke. I spent a few days with Bob, Al, and Bill up in the Eastern Sierras fishing Crowley Lake and I have to say that Al and Bill approach fishing like a couple of sailors on a three day liberty, although they were trained to be pilots via the US Air Force Academy.

They spend their working hours piloting airplanes for Delta and US Airways, but when it comes to fishing, the trusty Jeep is their steed AND home away from home. No Comfort Inn for these guys, a sleeping bag and a pup tent by the lake is all that is necessary. They think nothing of driving all night and fishing all day 'till the last bit of daylight when they collapse into their Jeep for a few hours rest. It's commando fishing and if there is fish to be caught they will accomplish their mission.

--Ed.

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JACK BENTLEY

**Any Questions?
Call Jack Bentley at**

More information will follow in the next months. If anyone wants information on fishing destinations, contact me.

SDFP Trip Schedule for 2005

1. Green River, May 9th-14th

This is our most popular trip. Sign up to reserve your spot. 3 fishing days or 4 fishing days available. Estimated cost of 3 or 4 days of guided fishing:

3-day fishing \$1,280 or 4-day fishing \$1,550.

Walking and fishing is available with no guide, but as the water fluctuates, the boats are more productive. Select either 3-day or 4-day fishing proposed above.

2. Alaska King Salmon, June 24-July 2nd

Nushagak River

Estimated cost: \$3,800

Contact Louie Zimm

3. Saltery Lake Lodge, September 10th-18th

This year's drought was atypical and we are planning to have the lodge to ourselves (Maximum 12 people).

Estimated cost: \$3,200

Contact Louie Zimm

Eagle Lake

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**Jay Fair Trolling
Attractor**



**Kaufmann Mini-Leech
Brown**



Loeberg Variant Brown



**Jay Fair Variant Tied
Weedless**



Loeberg Variant Olive



**Loeberg Variant Brown
Guinea with Flashabou**



FROM THE CONSERVATION CHAIR



GARY STRAWN

The attached letter was sent to San Diego Fly Fishers by Tim Alpers, the President of the Hot Creek Hatchery Foundation. In 2005 your SDFP board plans continued financial support for a variety of Eastern Sierra fisheries conservation projects. Additionally, I expect several calls for volunteers to assist in various projects at the Hot Creek Hatchery during 2005. If you are interested, please contact me at the next meeting or at [\[redacted\]](#) and I'll add you to our email / phone list for volunteer opportunities.

The Hot Creek Hatchery Foundation recently signed private and public partnership with the California Department of Fish and Game. Facing an onslaught from State budget cuts and invasive intruders like the New Zealand Mud Snail, private and public partnerships like this one, may be the only hope for sustaining California's coldwater fisheries in the future.

To learn more about the Hot Creek Hatchery Foundation / DFG partnership, go to:

HOT CREEK HATCHERY FOUNDATION
PO Box 3788
Mammoth Lakes, CA 93546

October 6, 2004

Dear Contributor:

On behalf of the Hot Creek Hatchery Foundation, I would like to thank you for your generous contribution to the preservation of fishing in the Eastern Sierras. As you are aware, the future of fishing opportunities in California is in jeopardy. With your help our partnership with the state of California will ensure that the Eastern Sierra will continue to be one of the top destination trout fishing regions in the United States.

Although the Hot Creek Hatchery is a regional hatchery, it has critical statewide importance. Over 60% of the fertilized trout eggs that are provided for the entire state hatchery system come from the brood stock at the Hot Creek Hatchery. Some of the most beautiful and genetically wild trout in the world come from the genetic strains that have been developed over the past seventy-five years at this hatchery.

That you have helped to promote the continuation of a healthy natural environment as well as sustained family use of and positively impacted the economic status of the Eastern Sierra, deserves accolades.

Again, thank you for your support.

Very truly yours,

Tim Alpers
President, Hot Creek Hatchery Foundation



FLY OF THE MONTH

TEENY NYMPH

Hook: Tiemco 5212 or Mustad 3399 Size 2 - 14
Thread: Brown 6/0
Body: Natural Ringneck Pheasant tail fibers
Legs: Tips of fibers used for the body

1. Place a de-barbed hook in the vice and wrap a layer of thread from behind the eye to the bend of the hook.

2. Remove approximately 24 fibers from a natural Ringneck Pheasant tail feather. On a large fly you may have to use a second bunch of fibers. Align the tips of the fibers. A hair stacker does not work well. It is best to do the aligning with your fingers. Trim the butt ends of the fibers so that all the fibers are the same length. Tie the fibers on at the bend of the hook. Take the thread forward to just behind the hook eye. Tie a half hitch at this point.

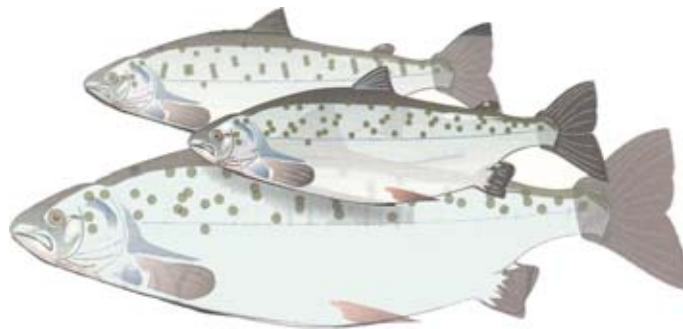
3. Take the tip ends of the fibers between your thumb and first two fingers and make a slight twist counter clockwise. Wrap the fibers in close wraps around the hook shank to a point one hook eye width behind the hook eye. Tie off at this point with the tips below the hook shank and tie a half hitch. You should have fiber tips approximately the

length of the hook shank which will be used to form the legs.

4. Hold the fiber tips under the shank and towards the hook point forming the legs. Secure the fibers with the tying thread and tie a half hitch. If you do this correctly the fiber tips will be pointed towards the hook point. Wrap a neat tapered head with the tying thread. Whip finish and apply head cement.

Jim Teeny created this fly in 1962. Over the years this fly has been responsible for a number of world record fish. This single material easily tied wet fly can be a winner. It was originally tied with natural colored fibers only. It has recently been tied with dyed Ringneck Pheasant tail feathers. It can be used as a stillwater fly or in streams. Fishing in a stream try quartering upstream and make upstream mends to sink the fly and keep it near the bottom.

Good Tying - Tom Smith





CALIFORNIA TROUT

Filed electronically

January 5, 2005

Dr. Eva Begley
California Department of Water Resources
Division of Engineering
1416 Ninth Street, Room 620
Sacramento, CA 95814

Re: The Simulation of Natural Flows in Middle Piru Creek, DEIR

Dear Dr. Begley:

California Trout, Inc. offers the following comments concerning the November 2004 California Department of Water Resources (DWR) Draft Environmental Impact Report regarding The Simulation of Natural Flows in Middle Piru Creek, (DEIR). The DEIR is based on the erroneous assumption and material error to not include a federally listed species, i.e. steelhead, within its analysis.¹ As such, the environmental consequences of the DEIR alternatives are without the proper suite of studies or facts from these missing studies, and thus the possible impacts of the proposed alternatives for DWR or the public to fully comprehend. The California Environmental Quality Act (CEQA) process is designed to “demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.” (14 Cal. Code Regs. § 15003(d)). The omission of an endangered species investigation and analysis violates CEQA’s most substantive provisions, which prohibits approval of projects without adopting feasible mitigation measures or alternatives (CEQA § 21002). CEQA requires a mandatory finding of significance for impacts on rare or endangered species. (CEQA Guideline 15065(a)).

On August 18, 1997 the Department of Commerce, National Marine Fisheries Service (NMFS) made a final listing determination for five Evolutionary Significant Units of west coast steelhead under the Endangered Species Act (ESA). (62 FR 43937-43954). The Service determined the steelhead within Southern California’s Evolutionary Significant Unit (ESU) - those remain populations of steelhead from the Santa Maria River (San Luis Obispo County) south to Malibu Creek (Los Angeles County) including the Santa Clara River - are an endangered species. The full force of the Endangered Species Act with respect to the published listing went into effect on October 17, 1997.

On December 10, 2004, the NMFS proposed critical habitat designations for two ESUs of chinook salmon and five ESUs of anadromous steelhead (including resident rainbow trout) in California that are listed under the Endangered Species Act. This proposed rule now includes the middle Piru Creek. This occurred after DWR produced its DEIR.

Be advised the NMFS’s proposed critical habitat designation has materially and substantively changed the baseline conditions for your agency’s DEIR. This requires the Department of Water Resources to suspend certification of your document until, at a minimum, the NMFS produces a final critical habitat rule. Specifically, the DWR’s assumption concerning project non-impact on a federally listed species, i.e. steelhead, has not been address within the DEIR. In deed, the DEIR glosses over project impacts on now proposed critical habitat for steelhead, and is fraught with assumptions that are without adequate technical underpinnings.

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Middle Piru Creek Now Proposed as Steelhead Critical Habitat

On December 10, 2004 the NMFS published a proposed new critical habitat rule which includes the Middle Piru Creek from Pyramid Dam downstream to Santa Felicia Reservoir. (see Fed. Reg. Vol. 69, No. 237).

“The Team also concluded that inaccessible reaches of Piru Creek and its tributaries above Santa Felicia Dam may be essential to the conservation of this ESU. The Team reached this conclusion because historical records indicate that the inaccessible habitat reaches above Santa Felicia Dam provided the principal spawning and rearing habitat for a historically large anadromous *O. mykiss* population within the Santa Clara River watershed prior to construction of the dam. In addition, most of these unoccupied river reaches are located on lands under public ownership and management, primarily the Los Padres National Forest. Because of the large size of the Santa Clara River watershed, it is likely to have historically supported one or more independent populations prior to dam construction which contributed to the resiliency of the ESU and served as a buffer against its extinction. The currently occupied habitat areas within the range of the SC *O. mykiss* ESU are relatively small in number and size, and in many cases are isolated from other occupied habitats, thus the re-establishment of larger populations such as the one that historically occurred in the Santa Clara River watershed may be necessary to reduce the extinction probability of this ESU. We seek comment on whether unoccupied areas above Santa Felicia Dam should be proposed as critical habitat.” (see Fed. Reg. Vol. 69, No. 237, page 71899).

Steelhead Habitat Needs in Middle Piru Creek

In its December 10, 2004 proposed critical habitat rule, the NMFS described the habitat needs for steelhead. Steelhead have a complex life cycle which gives rise to complex habitat needs, particularly during the freshwater phase (see review by Spence et al., 1996). Spawning gravels, which are not blocked by Pyramid Dam from natural recruitment, must be of a certain size and free of sediment to allow successful incubation of the eggs. Eggs also require cool, clean, and well-oxygenated waters for proper development. Juveniles need abundant food sources, including insects, crustaceans, and other small fish, which will require adequate year round instream flows to be sustained. They also need places to seek refuge from periodic high flows (side channels and off channel areas), such as those proposed by DWR within its DEIR. Steelhead, during all of its freshwater life cycle require cool water with particular emphasis to avoid warm summer water temperatures. (see Fed. Reg. Vol. 69, No. 237, page 71886).

DWR's Failure to Consult with the NMFS

As referenced above, it has been readily known since August 17, 1997 that steelhead within the Santa Clara River watershed have been become a federally listed species. DWR has prepared a list of agencies, organizations, and persons who were consulted during the preparations of the DEIR (see DEIR page 9-1 and 9-2). According to the DEIR, DWR has not consulted with the federal agency responsible for the management of steelhead as a listed species, i.e. the NMFS. This material fact is a serious error and omission of both CEQA, as well as the federal ESA.

DWR Hydrologic Simulation

DWR's hydrologic simulation, as illustrated by Figure 3.2-1, is in error as its period of examination is too short to accurately predict unimpaired flows, i.e. a mere six years covering 1996 to 2002. For example, Figure 3.2-1 indicated mean inflow to Pyramid Lake during January is below 40 cfs, and for March below 140 cfs. The USGS gauge information for Gauge #11109375 plus Gauge #11109395 covering the period 1976 to 2003 determines these flows average above 70 cfs for January

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and above 170 cfs for March. These flows do not include additional steamflow which may occur due to precipitation on the surface of Pyramid Lake. Other errors likely exist in part due to the limited period of DWR's hydrologic analysis.

We recommend the analysis be redone using the longest period of record available from the USGS and to separate this analysis into dry, normal, and wet water years types to enhance the comprehensive understanding of the CEQA document. Moreover, this information should be presented both in a tabular and graphic forms to clarify with great but necessary precision hydrologic findings.

Proposed Project Will Violate State and Federal Water Quality Statute

Consistent with the requires of both the State of California's Porter-Cologne Anti Degradation Act, as well as the federal Clean Water Act, water quality beneficial uses for the middle Piru Creek have been established which are to be collectively protected and sustained on a continuous basis. The Los Angeles Regional Water Quality Control Board has, within its Basin Plan, made a finding of fact that "coldwater habitat" is one of the beneficial uses for middle Piru Creek. The State Water Resources Control Board has defined coldwater habitat as a narrative standard where water temperatures shall not exceed 68°F.

The Federal Energy Regulatory Commission (FERC) is required to either obtain or a waiver from the State of California in regards to a Clean Water Act 401 Certificate. As DWR project proposes to reduce instream flows which will induce water temperatures above the coldwater habitat standard of 68°F, a violation of law may occur. At a minimum the DEIR must acknowledge this material finding of fact, while simultaneously advising FERC of their potential liability, and require DWR to seek an amendment to its FERC license including obtaining a new 401 Certificate.

Formal Consultation May be Required

Under ESA section 7(a)(2), the FERC must assure that its licensing action, as well as under its ongoing regulatory stewardship, projects such as DWR's Pyramid project, is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat of such species. Critical habitat is designated as necessary for the species' conservation and recovery. See ESA section 3(5)(A); see also *Gifford Pinchot Task Force v. USFWS*, 378 F.3d 1059 (9th Cir. 2004).

Under 50 CFR § 402.14(a), formal consultation is required for any federal action that "may affect...critical habitat," unless the lead agency publishes a Biological Assessment (BA) or preliminary Biological Opinion (BO) that determines, with the FWS' concurrence, that the action will not adversely affect such habitat (id., (b)).¹

To the best of our knowledge no formal consultation has been initiated by FERC or DWR, yet the DEIR establishes the need such action. A failure to initiate formal consultation would expose FERC to the potential expose to "taking" liabilities under the ESA.

Conclusion

California Trout submits that DWR should not proceed with altering the current operational scheme of providing a minimum of 25 cfs until such time as the new NMFS information, as well as numerous and substitutive errors and serious omissions we point out have been fully rectified. Amongst these serious errors and omissions are:



Piru Creek

continued from previous page

1. The omission of an endangered species investigation and analysis which violates CEQA's most substantive provisions, which prohibits approval of projects without adopting feasible mitigation measures or alternatives (CEQA sec. 21002).
2. The omission of CEQA Guideline 15065(a) requiring a mandatory finding of significance for impacts on rare or endangered species.
3. New information concerning a published proposed federal critical habitat designation for steelhead and middle Piru Creek which undermines the basic assumption the DEIR was built upon.
4. Exposing agency and personal liabilities to FERC for takings under the federal Endangered Species Act.
5. Incomplete hydrologic analysis leading to errors of fact.
6. Possible violations of both state and federal water quality laws.
7. Drawing conclusions about rainbow trout genetics in an arbitrary and capricious manner by relying on unsubstantiated information.
8. Failure to consult with the NMFS concerning a project which may have steelhead implications.

We appreciate the opportunity to provide you with these comments. Kindly keep us informed of your timely future actions on this activity.

Sincerely,

California Trout, Inc.



Jim Edmondson
Southern California Manager
5436 Westview Court
Westlake Village, CA 91362
(818) 865-2888

¹ DWR maintains in its DEIR that genetic studies have demonstrated that the rainbow trout population in Middle Piru Creek are not related to steelhead, but this positions relies on a mere "personal communication" with the a single Department of Fish and Game staff person. No site specific study is provided or reference in order to determine the veracity of the reported "genetic study" and as such is mere speculation.

☘



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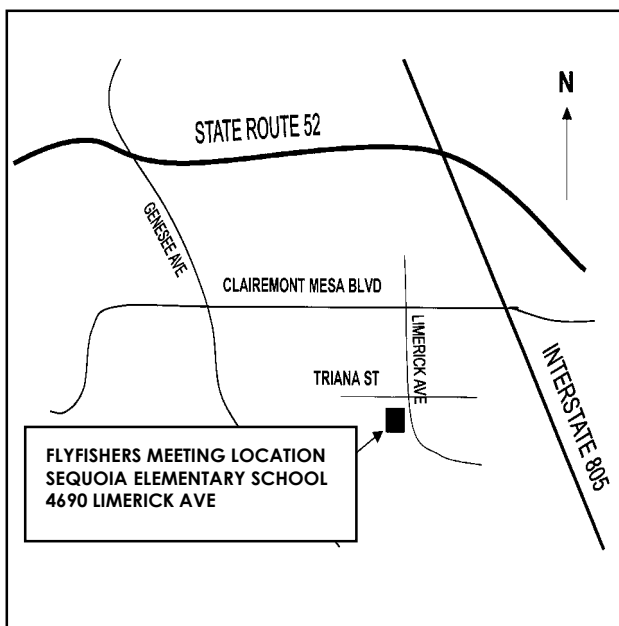
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Newsletter CoEditors-
 Rose & Roger Yamasaki
 5415 Lodi Place, San Diego
 92117, 858-274-2712
 E-mail:
 finnyfacts@lycos.com
Programs- Jim Castelluzzo
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San Diego Flyfishers Headquarters
 Stroud Tackle
 1457 Morena Blvd.
 San Diego, CA 92110
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