Ed Henke
Historical Research
769 Lisa Lane • Ashland, Oregon 97520 • 541-482-9578

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June 21, 1999

Ms. Jean Baldrige, Project Coordinator
Santa Ynez River Fisheries Technical Advisory Committee
Entrix, Inc.
590 Ygnacio Valley Road, Suite 200
Walnut Creek CA 94596

Subject: COMMENTS REGARDING TAC'S LOWER SANTA YNEZ RIVER FISH MANAGEMENT PLAN, VOL. 1 MANAGEMENT PLAN AND VOL. 2 APPENDICES, APRIL 10, 1999

Dear Ms. Baldrige:

My wife and I just returned from the coast, and your letter of June 2 and enclosures were among over two weeks of accumulation. Thank you for your kind acknowledgement of my letter and enclosure to you regarding what I determined to be the general public's invitation to comment on your group's recommendations for the restoration of the historical cold-water aquatic resources of the Santa Ynez River System, both flora and fauna.

Again, time constraints and other will not allow me to comment fully and directly to the voluminous amount of information you forwarded to me on June 2, 1999. I am just completing months of comment work on CRITICAL HABITAT DESIGNATIONS for the National Marine Fisheries Service. Please consider all comments made in my EIS for the **Cachuma Project** forwarded to you on May 18, which has great relevance, as well as the following very generalized outline statements developed after a cursory run-through of your two voluminous amounts of your stated management alternatives, etc., forwarded to me on June 2, 1999...

Generalized Comments and Statements

- There will be "**hard science**" challenges to your alleged assumption that the "Fish Management Plan" alternatives as proposed will not adversely affect listed "**threatened**" or "**endangered**" **species**... I would join such "**hard science**" challenges regarding such an assumption.
- The "**fish reserve account**" violates present/prior Public Policy decisions, the most obvious being **Section 5937 of the California Department of Fish and Game Code.**
- There's nothing in the two documents that, through "**hard science**" scrutiny, can justify the so-called water flow release regimens as recommended from Cachuma Dam (Bradbury) that will guarantee the restoration or prevent extirpation of "**threatened**" or "**endangered**" cold-water aquatic resources of the Santa Ynez River, flora and fauna. It would not pass muster or fit within the guidelines of "**conservation**" as defined under **Section III-3** of the Federal Endangered Species Act: quality, quantity, temperature, pulse flows, etc.
- I found no quality mitigation and restoration efforts proposed regarding the Santa Ynez River's historical and extensive estuarine system. Under the **Federal Clean Water Act** and its "**303-D Impaired Water Body Standards**," one would no doubt find the Santa Ynez River estuarine system receiving a failing grade.