19 June 2020

President Eric Sklar
California Fish and Game Commission
PO Box 944209
Sacramento, CA 94244-2090

RE: California Inland Trout Fishing Regulation Change/Simplification Process

Dear President Sklar:

On behalf of our thousands of members, supporters, partners, and associated angling businesses across California, we thank you for your leadership and collaborative approach in simplifying the new Inland Trout angling regulations. We applaud the Commission and Roger Bloom and his staff at the Department of Fish & Wildlife for their willingness to encourage public input in this important process.

Since the inception of this process, we have championed protection of our sensitive native and wild trout and attempted to balance that with the need to increase angling opportunities and participation and maintain the opportunity to harvest trout where appropriate. We feel the current revised trout fishing regulations largely balance the goals stated above. Specifically, we strongly support the recent changes made to the 7.0 Statewide Regulations for streams and rivers in California that make all trout streams catch-and-release with artificial lures only during the winter/early spring season. This change reflects our conviction that such measures are appropriate during that season, when trout are especially vulnerable as they congregate and prepare to spawn.

However, the latest revision to the inland trout fishing regulations does not adequately protect wild trout fisheries or meet stated management in a few iconic trout waters. The following comments reflect our strong sentiments, informed by many years of collective experience from our partners across California, regarding these iconic trout streams:

- **Truckee River**: We believe the trophy trout fishery in the Truckee River, which is designated as a Wild and Heritage Trout Water by the Department of Fish and Wildlife, should be managed with a single regulation mandating catch and release angling year-round with barbless lures and flies *with a single hook* to reduce unintended hooking damage and mortality.
Since the provision for single barbless hooks is not currently an option “on the menu” of regulation alternatives, we are requesting year-round catch and release angling with artificial flies with barbless hooks (Option A, #7) for the reach from Trout Creek to Prosser Creek. This proposal would simplify the regulations for this reach by making them consistent with the existing fly-fishing-only reach from Glenshire Bridge to the Highway 80 Bridge while adequately protecting wild trout. We feel this reach of the Truckee River meets the stated rationale for use of this most conservative regulation option, namely: need for mitigation of angling impacts on trout in high-use areas, desire to achieve fast action and trophy fisheries, and promoting a unique angling experience in the region.

For the reaches from Lake Tahoe to Trout Creek in Truckee and from Prosser Creek downstream to the Nevada state line, the current proposal would allow anglers to use artificial lures and harvest wild trout. We believe the current proposed regulation will not adequately protect fish from unnecessary hooking mortality associated with barbed lures in these very popular reaches. Therefore, we request adoption of year-round catch and release angling only with artificial, barbless lures (Option A, #6) for these reaches. The uppermost reach from Lake Tahoe to Trout Creek contains significant spawning habitat, many sites of significant investment to improve fish habitat, and is subject to significant dryback events during dry and drought years. This regulation would help support sensitive wild trout populations, achievement of the objectives of the Wild and Heritage Designation of the Truckee River, and support numerous businesses and guides that make their living from this resource.

- **Upper Sacramento River:** Rather than 3 different regulations for this river, we recommend instead a unified regulation to support this wild trout-dominated fishery: year-round, 2 fish bag, barbless artificial lures only (Option A, #3). This would maintain harvest opportunities while adequately protecting the large spawning fish that migrate up from Shasta Lake and throughout the lower river downstream of Dunsmuir. In addition, we feel this regulation will meet the primary management objective of the 2000 Fishery Management Plan for the Upper Sacramento River:

  “1. ... to develop a world-class wild trout fishery. The river is capable of producing abundant wild trout and special angling regulations will be used to maintain the wild trout population at levels producing high quality angling opportunities.” (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=56621&inline) pg. 31.

- **East Walker River:** We are advocating for catch and release angling year-round with barbless artificial lures (Option A, #6) on this trophy wild trout fishery. This change would support opportunity for anglers and the local economy in Bridgeport.

- **Mokelumne River:** We propose catch and release angling year-round with artificial, barbless lures (Option A, #6) from the Highway 49 Bridge downstream to Lake Pardee at Middle Bar Bridge. There are currently no catch and release fisheries in the Sierra Foothills, and it would serve to fill that gap. This proposal maintains harvest for anglers off Middle Bar Bridge, which provides angling opportunities for persons with disabilities and those requiring wheelchair access.

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**East Fork Carson River:** We recommend maintaining catch and release regulations with artificial lures and barbless hooks (**Option A, #6**) below Hangman Bridge to the Nevada state line. Under this proposal, this trophy trout fishery will continue to draw anglers from far and near and continue to contribute to the local economy in Markleeville. We believe these suggestions would meet two stated management goals of the 1979 *East Fork Carson River Wild Trout Management Plan*:

“2. To perpetuate a self-sustained, balanced population of rainbow, brown, and Lahontan cutthroat trout.
3. To provide a quality backcountry angling experience…”


Thank you for your careful consideration of these proposed amendments to the revised inland trout fishing regulations. We look forward to working with you to ensure that California’s wild trout continue to thrive now and into the future.

Respectfully,

Patrick Samuel
Bay Area Program Manager
California Trout