



December 15, 2025

Delta Stewardship Council  
715 P Street, 15-300  
Sacramento, CA 95814  
via email to: [reviewadvice@deltacouncil.ca.gov](mailto:reviewadvice@deltacouncil.ca.gov)

**Re: Water Year 2024 and 2025 Winter-run Chinook Salmon Annual Loss**

Pacific Coast Federation of Fishermen's Associations (PCFFA) is the statewide organization of port associations led by working fishermen from every major fishery and port, representing California's commercial fishing families, including the commercial salmon fleet. Institute for Fisheries Resources (IFR) is our sister organization, focusing primarily on salmon habitat.

Our members depend on the legendary abundance of the Sacramento River to support our families and communities. Sacramento fall-run Chinook are the primary contributor to ocean fisheries throughout California and much of southern Oregon. Without healthy stocks of fall-run Chinook, our ocean fisheries are completely closed, as we have seen over the past three years.

While we don't target Sacramento River winter-run Chinook, depleted numbers of winter-run Chinook severely constrain our access to other, more abundant stocks in our mixed-stock ocean fisheries. We applaud all efforts to increase the sustainable population of Sacramento River winter-run Chinook; *however*, there must be balance between all stocks in the Sacramento system. In past years, we have seen an abundance of caution applied to water operations in order to support winter-run Chinook, at the great expense of fall-run Chinook.

We are concerned that prioritizing the needs of winter-run Chinook inadvertently increases adverse impacts on fall-run Chinook. Conditions may exist that would justify an Endangered Species Act listing for Sacramento River fall-run Chinook. Fishermen, water users, and regulators cannot afford such a listing.

We recommend that Delta Stewardship Council formally consult with the Pacific Fisheries Management Council on fisheries impacts (not just fish populations) at all stages of the current review. Healthy ecosystems must do more than support minimum numbers of salmon; they must produce a harvestable abundance of fish. A wholistic understanding of the dynamics of commercial and recreational harvest is necessary to balancing interests of all Chinook stocks in the Central Valley system.



We also recommend completion of the fall-run Chinook Full Lifecycle Model so any future conflicts between winter-run and fall-run Chinook can be identified and avoided.

Thank you for your consideration,

Sarah Bates.  
President  
Institute for Fisheries Resources