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**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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October 26, 2011

Jim Kellogg, President  
California Fish and Game Commission  
P.O. Box 944209  
Sacramento, CA 94244-2090

RE: Proposed Fish Stocking Regulations

Dear Mr. Kellogg:

It has come to our attention that the California Fish and Game Commission will be considering new fish stocking regulations at its December 2011 meeting in San Diego. After carefully review, the Orange County Water District would like to express its concern with how the proposed regulations might negatively impact its operations and existing business relationships.

OCWD serves 23 cities and water agencies, including approximately 2.4 million people, in north and central Orange County. The District owns 1,600 acres in and near the Santa Ana River in Anaheim, which it uses to capture flows and recharge the basin. The District also owns 2,400 acres above the Prado Dam, which it uses for conservation and water quality improvement.

OCWD was previously unaware of the Environmental Impact Report (EIR) regarding fish stocking when it was initially released for public comment. As a result, we didn't have an opportunity to review the EIR before its certification. Having recently learned of the proposal, OCWD believes that the regulations are unduly burdensome and costly.

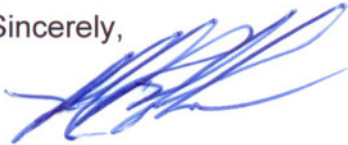
The proposed regulations would require periodic environmental analysis of the impact of stocked fish on the surrounding ecosystem. The fish currently stocked have existed in the local ecosystem, without any negative impacts for a number of years and stocking is only done to replenish the fish harvested by lake visitors. By some accounts, it is estimated that these regulations could cost some modestly-sized lakes up to \$100,000 a year. This cost would present a hardship for our lake operator/lessee who could not economically absorb these fees and remain in business. Ultimately, these regulations would result in a loss of jobs provided by the lake operator, loss of rental revenue to OCWD, loss of economic revenue created by recreational fishing visitors and tourists,

and a devastating loss of a valuable and popular recreational location for families in the local community.

Our lake operator/lessee receives no financial support from OCWD or any other government agency. They pay 100% of the cost of the fish they stock with no offset against rent due the District. The proposed regulations would also require the lake's customers to purchase fishing licenses, something not required in over 30 years. It is unlikely that, in the current economy, small businesses or families could bear all the new costs that these regulations would impose.

Adopting the proposed regulations will likely end long-standing, mutually beneficial relationships between local government entities and its community partners and deal a fatal blow to California's recreational fishing industry, which has been enthusiastically supported by many families across our great state for generations. OCWD respectfully urges your careful consideration on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Markus", written over a horizontal line.

Michael R. Markus, P.E.  
General Manager

CC: Governor Edmund G. Brown, Jr.  
Orange County State Legislative Delegation  
Metropolitan Water District of Southern California  
Association of California Water Agencies  
California Special Districts Association  
League of California Cities