

DRAFT LETTER

The Honorable Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

RE: Action Requested to Prevent Klamath River Fish Kill

Dear Secretary Jewell:

The Pacific Fishery Management Council (Council) is concerned that potential low flows in the Klamath River will substantially affect salmon essential fish habitat (EFH) and potentially create conditions leading to a fish kill in the Klamath River during the fall Chinook migration in late summer of 2014, such as occurred in 2002. The purpose of this letter is to recommend, as we did last year, that the Department engage in advance planning for stored water releases this fall to prevent such an occurrence.

As you know, the Council is one of eight regional fishery management councils established by the Magnuson-Stevens Fishery Conservation and Management Act of 1976 (MSA), and recommends management actions for Federal fisheries off Washington, Oregon and California. The MSA includes provisions to identify, conserve, and enhance EFH for species regulated under a Council fisheries management plan. Each Council is authorized under MSA to comment on any Federal or state activity that may affect the habitat, including EFH, of a fishery resource under its authority. Furthermore, for activities that the Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, the Council is obligated to provide comments and recommendations (MSA §305(b)(3)).

Forecasted Flows

Precipitation and resultant water supply in the Klamath Basin this year are most likely to continue a trajectory toward extreme drought, perhaps the worst on record. This is indicated by the fact that precipitation has been substantially lower than average since January of 2013 and that flows at several gauging stations throughout the Basin today stand at levels at or below those seen during the drought of 1997-98. Precipitation between now and August will most likely be insufficient to mitigate adverse habitat conditions. There are water management decisions to be made between this point and September, and we remain concerned that sufficient water supplies be provided for now so that the Bureau will be in a position to prevent conditions that may appear in the lower river similar to those that led to the September 2002 fish kill, when more than 33,000 adult salmon died in the Lower Klamath River.¹

¹ Guillen, G.J. 2003. Klamath River Fish Die-off: September 2002: Report on Causative Factors. AFWO 03-03. USFWS. Arcata, California

The hydrologic data for June 2014 provides evidence that flow levels in the lower Klamath River will likely fall below minimum thresholds developed collaboratively by the Trinity River Restoration Program (TRRP) and the Bureau of Reclamation's Klamath Basin Area Office under the guidance of the TRRP's Fall Flow Subgroup for protection of adult fall Chinook migrants.² Specifically, flows no lower than 2,500 cfs as measured at USGS gage "Klamath River near Klamath" are needed commencing in August and continuing at least through September 21. The Subgroup determined that this minimum discharge would be recommended regardless of projected run size for Klamath fall Chinook salmon. Additional supplementations would be necessary, should disease outbreaks or unseasonably warm late-September water temperatures come to pass.

Requested Action

The Council requests that you weigh allocations of water for adult returns in the current year, and pursue all necessary measures to ensure an adequate amount of supplemental water be available for release from the Trinity and/or Upper Klamath basins during the peak migration and holding timeframe for the fall Chinook return. Such flow augmentation should be designed to maintain the quality of salmon EFH and minimize the likelihood of another fish kill, by alleviating the river flow patterns and adverse conditions that resulted in the 2002 fish kill. Therefore, we recommend that the Department of Interior work with Klamath Basin scientists, the TRRP, and co-managers to determine the best manner for minimizing the potential for another fish kill.

The Council also recognizes that actions taken this year may impact available water management strategies in the coming year, and that those impacts must be evaluated.

In closing, the Council is concerned that planning efforts be initiated now to ensure protection of EFH. This recurring issue leads us to recommend, as we have in the past, that the Department of Interior finalize a permanent and comprehensive plan to address the needs of lower Klamath fish passage.

We are prepared to assist with this effort in any way possible. We would appreciate hearing about such planning, and offer our assistance in any way possible.

Thank you for your attention to this important matter.

Sincerely,

D. O. McIsaac, Ph.D.
Executive Director

² Hayden, T. 2012. Memorandum to the fall flows subgroup. Re: 2010 and 2011 Fall flow release criteria and evaluation process. Available from the Trinity River Restoration Program. <http://odp.trrp.net/Data/Documents/Details.aspx?document=1608>