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MODIFIED CALFED LETTER---

David Hayes, Deputy Director
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

DRAFT

Mary D. Nichols, Secretary
California Resources Agency
1416 Ninth St., Room 1311
Sacramento, CA 95814

Dear Mr. Hayes and Ms. Nichols:

The Pacific Fishery Management Council (Council) manages fisheries in California, Oregon, and Washington that depend on the ecological health of the Bay-Delta System. The Council, through the 1976 Magnuson-Stevens Fishery Conservation and Management Act and its subsequent amendments, has been charged by Congress to provide comments on federal actions in order to assure the minimization of impacts to the essential fish habitat of the fish it manages. The Bay Delta system and the ecological processes supported by this system are part of the essential habitat for salmon (fall chinook, steelhead, and coho) as well as numerous groundfish species whose life cycles depend on the productivity and habitats that the estuarine and wetland environments provide (e.g.).

We write to urge you and other members of the CALFED policy group to give primary weight in your strategic plan to rehabilitating the biodiversity and ecological processes of the Bay-Delta system. Such rehabilitation is essential to the fish stocks we manage and to the current and future economic well being of fishermen and coastal communities in the region.

We are grateful for and continue to support CALFED's efforts to restore habitat and manage water operations to benefit our sensitive salmon populations. However, there are many risks and uncertainties inherent in various management options. Therefore, as you move forward in your plans, we urge you and your science groups to acknowledge these uncertainties and in response take a 'risk-adverse' approach. Restoring functioning systems within a highly altered background and restoring the fish that depend on such functioning systems will mean maximizing those potential benefits over other considerations when uncertainty is high.

Additionally, the Council urges the Policy group to incorporate the following

as requirements in any plan

- * preference for restoration of natural ecological processes (e.g. through dike removal, water transfers/water markets) over engineered solutions such as increasing dam height and storage.
- * quantitative performance measures established for all ecological rehabilitation efforts
- * quantitative performance measures linked to numbers, diversity of fish runs
- * a monitoring plan adequate to establish baseline and evaluate success based on performance measures
- * a process by which changes can be made (adaptive management) based on such monitoring results
- * identification of long-term funding sources for the plan and its monitoring component
- * long-term commitment of funding for a long-term inter-agency, science-based governance body to assure plan execution and success.

We intend to monitor the development of CALFED's Assurances package and Record of Decision, and stand ready to assist in any way we can.

Respectfully,

DRAFT
Jim Lone, Chair