

PACIFIC FISHERY MANAGEMENT COUNCIL

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

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

Dear Mr. Hayes and Ms. Nichols:

As a follow up to our letter of September 1999 regarding the CALFED DEIS, we have the following comments regarding your habitat and water management programs.

The Pacific Fishery Management Council (Council) manages fisheries off California, Oregon, and Washington that depend on the ecological health of the San Francisco Bay-Sacramento and San Joaquin Delta System (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 to minimize impacts to the essential habitat of the fish it manages. The Bay-Delta System, its biological components and the ecological processes supported by this system are part of the essential habitat for salmon (winter chinook, spring chinook, fall chinook, and coho), for coastal pelagic species (Pacific sardine and northern anchovy), as well as for numerous groundfish species whose life cycles depend on the productivity and habitats that the estuarine and wetland environments provide (e.g. English sole, starry flounder, California halibut, brown rockfish, lingcod, leopard shark).

We write to urge you and other members of the CALFED policy group to give primary weight in all of your programs 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 and steelhead 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-averse' approach. Restoring functioning ecosystems within a highly altered background and restoring the fishes 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 your programs:

- * 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 fish numbers and species diversity.
- * 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 an on-going inter-agency, science-based governance body to ensure 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,

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Jim Lone Chair