

PACIFIC FISHERY MANAGEMENT COUNCIL

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March 23, 2003

Mr. Robert Lohn
Regional Administrator
National Marine Fisheries Service
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115-0070

Dear Mr. Lohn:

The Pacific Fishery Management Council (Pacific Council) has been advised that the Bonneville Power Administration (BPA) is proposing to reduce or eliminate its program of providing summer spill at the Columbia River Federal Hydropower Projects. This program was included as a requirement in the 2000 Biological Opinion (hydrosystem BiOp) allowing take of salmon stocks listed under the Endangered Species Act by the Columbia River hydropower system. Spill has been shown to provide higher juvenile survival than other means of passage and, as such, represents an improvement in essential fish habitat (EFH) for several Columbia River salmon stocks managed by the Pacific Council under the Magnuson-Stevens Act (MSA). The Pacific Council's Habitat Committee notes that an analysis prepared for the Columbia Basin Fish and Wildlife Authority indicates the no-summer-spill option will result in a system-wide loss of large numbers of adult chinook, in comparison to the hydrosystem BiOp spill program. On the basis of concerns about impacts to salmon EFH under the MSA, the Council wishes to express its grave concern about potential relaxation of current hydrosystem BiOp standards until it has been updated under legal remand.

In public forums convened by BPA to discuss alternative summer spill options, it has been suggested that additional mortality due to spill reduction can be offset by further reductions in fisheries. The Council does not believe that increased mortality from reduced summer spill should be offset by reductions in fisheries. Significant constraints face ocean fisheries again in 2004 due to the need to minimize impacts to Snake River fall chinook. These constraints, required by a different Biological Opinion that has not been relaxed, will be more severe in 2004 than most prior years, even though the incidence of Snake River fall chinook is extremely low in fisheries managed by the Pacific Council.

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The Pacific Council urges the National Marine Fisheries Service to take actions necessary to continue the summer spill program until all sources of mortality are comprehensively reviewed.

Sincerely,



Donald K. Hansen
Chairman

cc: Pacific Council Members
Steve Wright, Administrator, Bonneville Power Administration
Colonel Richard W. Hobernicht, District Engineer, U.S. Army Corps of Engineers,
Portland District
William McDonald, Regional Administrator, U.S. Bureau of Reclamation
David Allen, Regional Director, U.S. Fish and Wildlife Service
Steve Crow, Executive Director, Northwest Power and Conservation Council
Pacific Council Habitat Committee
Pacific Council Salmon Advisory Subpanel