

# PACIFIC FISHERY MANAGEMENT COUNCIL

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CHAIRMAN  
Mark R. Warrens

EXECUTIVE DIRECTOR  
Lawrence D. Six

June 2, 1994

Elizabeth Moler, Chair  
Federal Energy Regulation Commission  
825 North Capitol Street, NE  
Washington, D.C. 20426

RE: FERC consideration of application to license the Cushman Project, Project No. 460

Dear Chair Moler:

On April 8, the Pacific Fishery Management Council adopted the most restrictive ocean salmon fishing season in its 18-year history. This action, which will have adverse impacts on fishers and dependent coastal communities, was necessary to provide protection to salmon stocks critically depleted by weather and ocean habitat anomalies that have compounded long-standing impacts of habitat degradation, including the effects of hydroelectric projects under purview of the Federal Energy Regulatory Commission.

The Commission has before it an application to license the Cushman Hydroelectric Project on the North Fork Skokomish River (Project No. 460). The Cushman Project was built without fish passage facilities, inundating and blocking important salmon habitat. Until 1988 the project diverted the entire river out of its watershed to a remote power plant. These actions seriously degraded what once were the most productive riverine and estuarine salmon habitats in the Hood Canal Basin of Puget Sound. In its application, the City of Tacoma proposes to reduce its out-of-basin water diversion by only 9 percent, a reduction from the current level of 96 percent to a level of 87 percent of the river's average annual flow.

State, tribal, and federal resource agencies (Joint Resource Parties<sup>1</sup>) unanimously agree that the applicant's proposal is inadequate and would result in further degradation of salmon habitat. In the Council's view, this would be inconsistent with the fish conservation intent of the Magnuson Fishery Conservation and Management Act of 1976, and would be inconsistent with the habitat protection and restoration policies articulated in the Eighth Amendment to the Fishery Management Plan for Commercial and Recreational Salmon Fisheries off the Coasts of Washington, Oregon and California Commencing in 1978.

The Joint Resource Parties involved in the Cushman Project are unanimous in calling for investigation of streamflows necessary to restore riverine and estuarine ecological functions, including salmon production. The Council shares the Joint Resource Parties' position.

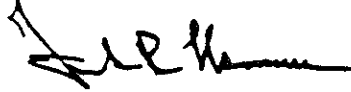
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<sup>1</sup> The Joint Resource Parties are: National Marine Fisheries Service, U.S. Department of the Interior (Fish and Wildlife Service, Bureau of Indian Affairs, National Park Service), Washington Department of Fish and Wildlife, Skokomish Indian Tribes, Point No Point Treaty Council.

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We urge the Commission to thoroughly evaluate comprehensive studies of instream flows and sediment production/transport prior to completion of the draft Environmental Impact Statement on the Cushman Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank R. Warrens". The signature is written in a cursive style with a prominent initial "F".

Frank R. Warrens  
Chairman

JCC:elw

c: Habitat Steering Group  
Northern Habitat Panel