

PACIFIC FISHERY MANAGEMENT COUNCIL

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December 15, 1994

Ms. Sarah Bransom
National Park Service
Western Team
PO Box 25287
Denver, CO 80225-0287

SUBJECT: Draft Environmental Impact Statement, Elwha River Ecosystem Restoration

Dear Ms. Bransom:

The Pacific Fishery Management Council was created by the Magnuson Fishery Conservation and Management Act (MFCMA) in 1976 with the primary role of developing, monitoring and revising management plans for fisheries conducted within federal waters off Washington, Oregon and California. Subsequent congressional amendments to the MFCMA in 1986 and 1990 added emphasis to the Council's role in fishery habitat protection, restoration and enhancement.

In view of the fishery habitat concerns specified in the MFCMA, the Council's Habitat Steering Group has reviewed the Department of the Interior's (DOI) Draft Environmental Impact Statement (DEIS) for the Elwha River ecosystem restoration. Based on that review, the Council's comments on the DEIS follow.

The Council notes that considerable effort went into the preparation of the Elwha River ecosystem restoration DEIS, including incorporation of information from the Federal Energy Regulatory Commission's DEIS for Elwha (Number 2683) and Glines Canyon (Number 588) dams, and the "Elwha Report" (Report to Congress). The level of analysis provided by DOI and the cooperating agencies is exceptional.

The Council strongly agrees with the conclusions reached by the DOI in the DEIS for full restoration of anadromous fisheries in the Elwha River system. Of the five alternatives examined, only the removal of both Elwha and Glines Canyon dams, associated reservoirs, and appurtenant facilities can achieve the goal of fully restoring anadromous salmonids to the basin. The Council notes that the Elwha River was historically one of the most productive producers of anadromous salmonids on the Olympic Peninsula, supporting runs of ten different stocks. Construction of two dams without fish passage facilities has restricted fish access to only the lower 4.9 miles of the Elwha River. Since construction of the dams, loss of gravel recruitment, woody debris and alterations in temperature regimes below the dams have degraded the existing habitat conditions to the point that the Elwha River supports only small runs of primarily hatchery supplemented coho, summer/fall chinook salmon and steelhead. Other historically abundant species such as sockeye, pink, chum, spring chinook salmon and summer steelhead are now either extirpated from the basin or potential candidates for listing under the Endangered

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Species Act. The Council notes that habitat conditions above the two dams are rated as excellent and the two reservoirs inundate additional important habitat. The majority of the Elwha River drainage (80 percent) is located within the boundaries of Olympic National Park and is in a pristine condition. Once accessible, these habitats will be colonized rapidly. Restoration plans for fish stocks call for a change from current hatchery supplementation to primarily wild stock management.

The outlook for salmon stocks throughout the Pacific Northwest currently is bleak. Recreational and commercial fisheries have been curtailed dramatically in many areas, resulting in huge economic losses. Many stocks are being considered for listing under the Endangered Species Act. Restoration of these stocks will not be easy. We have lost many formerly productive habitats to the effects of urbanization, logging, hydroelectric developments, mining and agricultural activities. Rebuilding and protecting in perpetuity the productive capacity of such habitats will be a long and costly process. The restoration of the Elwha River represents a unique opportunity to restore wild salmon stocks on a scale unparalleled on the West Coast. When compared to the costs of restoring other river systems that have been altered by land management practices, the restoration of the Elwha River will prove to be highly cost effective. Additionally, because of the ownership patterns within the drainage, this investment will not be threatened by future development activities.

In closing, the Council supports the conclusions reached in the DEIS. Restoration of the Elwha River clearly represents one of the best opportunities to dramatically increase wild salmon production in the Pacific Northwest.

Sincerely,



Lawrence D. Six
Executive Director

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c: Habitat Committee
Council members