

# PACIFIC FISHERY MANAGEMENT COUNCIL

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R. Warrens

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June 30, 1995

Mr. Mike Downs  
Water Quality Division Administrator  
Oregon State Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204-1390

SUBJECT: Adverse Effects of Herbicides on Pacific Coho Salmon

Dear Mr. Downs:

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, especially with regard to habitat of anadromous fish.

Among its duties, the Council must make numerous difficult decisions in dealing with the region-wide decline of many salmon populations. Closing sport and commercial coho fisheries off Oregon and California in 1994 and 1995 indicates the level of commitment the fishing community is making to reverse this decline.

However, closing fisheries is only a stop-gap measure. It does not fully address the root causes of our current problems. Declines in natural productivity of coastal coho stocks are a direct result of habitat destruction resulting from land-disturbing activities associated with human population such as logging, road building, agriculture, residential development and water development. All issues pertaining to the various stages in the salmon's life history must be examined if we are going to restore the once abundant salmon populations.

In view of the fishery habitat concerns specified in the MFCMA, members of the Council's Habitat Committee have reviewed the document Toxic Water: A Report on the Adverse Effects of Pesticides on Pacific Coho Salmon and the Prevalence of Pesticides in Coho Habitat by Grier et al. (enclosed). Based on that review, it appears the improper use of herbicides may be part of the current set of problems which must be resolved if we are to successfully recover natural salmon stocks.

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We are concerned that coastal salmon runs may be suffering injury from polluted runoff, reducing salmon productivity potential. The widespread use of herbicides appears to be implicated as a factor in salmonid mortality. These herbicides are generally more toxic to the egg, fry and juvenile stages of salmonid's life cycle than to adult fish. We are also concerned because herbicide impacts on salmonids have not been studied and were not considered as part of the original registration information required to register the active and inactive ingredients for general use in forestry and/or agriculture.

In its pursuit of regional coho salmon recovery, the Council needs to assess the significance of herbicides and your department's respective policy and processes. Toward that end, we would like to initiate a dialogue with your agency's appropriate staff concerning herbicide use and your Best Management Practices in coho habitat. Sampling methods, application technique and timing, and reporting systems are a few of the issues that must be discussed in light of information available from the Washington State Department of Ecology and the California Regional Water Quality Control Board.

To initiate the dialogue, we invite your staff to give a presentation to the Council Habitat Committee on issues pertaining to herbicide use, water quality and nonpoint source pollution. We would like to schedule the presentation during the week of October 23, 1995, when the Council meets in Portland. For any questions and to confirm the meeting schedule and arrangements, please call me at 503/650-5400 or John Coon of the Council staff at 503/326-6352.

We look forward to your response and cooperation in resolving these habitat concerns.

Sincerely,



for Stephen Phillips  
Habitat Committee Chair

Enclosure

c: Don Forbes, Department of Transportation  
John Mellot, Department of Agriculture  
Rudy Rosen, Oregon Department of Fish and Wildlife  
Will Stelle, National Marine Fisheries Service  
Charlie Stone, Department of Forestry  
Chemical Practice Advisory Committee