

PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

EXECUTIVE DIRECTOR
Lawrence D. Six

CHAIRMAN
C. Fletcher

Telephone: (503) 326-6352

August 23, 1996

Ms. Elizabeth Moler, Chair
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426

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

Dear Chair Moler:

The Commission is nearing a decision on an application to license the Cushman Hydroelectric Project on the North Fork Skokomish River. The Cushman Project was built in 1926-1930 without fish passage facilities, inundating and blocking important salmon habitat. Until 1988 the project diverted the entire North Fork out of its watershed to a remote power plant, and has since been operated to divert all but 4 percent of the North Fork out of the Skokomish River Basin.

For nearly 70 years, development and operation of the Cushman Project has seriously degraded conditions in the Skokomish River North Fork, mainstem and estuary. This drainage was once considered by the Washington Department of Fish and Wildlife to provide the most productive riverine and estuarine salmon habitats in the Hood Canal Basin of Puget Sound and "among the most important and valuable food salmon spawning streams in the State of Washington."


The Skokomish River system represents one of many river systems along the Pacific Coast which have suffered harmful impacts from long-standing and narrowly defined development projects. Faced with the results of degraded salmon habitat and production, the Pacific Fishery Management Council has been compelled to recommend drastic cuts in recreational and commercial marine fisheries over the past several years to protect the viability of many naturally produced salmon stocks, several of which are being considered for listing under the Endangered Species Act. These restrictions, however, are only a stopgap measure. They will aid the recovery of naturally produced stocks only if aggressive salmon habitat improvement programs are implemented to assure long-term productivity.

As the Council stated in its June 2, 1994 letter, continued degradation of salmon habitat in the Skokomish River system would be inconsistent with the fish conservation intent of the Magnuson Fishery Conservation and Management Act of 1976 and the habitat and restoration policies articulated in the eighth amendment to the Council's Salmon Fishery Management Plan for Commercial and Recreational Salmon Fisheries off the Coasts of Washington, Oregon and California.

Ms. Elizabeth Moler, Chair
August 26, 1996
Page 2

The Council requests the Commission take action consistent with state, tribal and federal resource agencies' recommendations to restore natural fish habitat in the Skokomish River system to the fullest extent practicable with the Cushman Project in place. In addition, the Commission should provide for full and timely mitigation for any net losses of habitat and related fish production potential.

Sincerely,


Robert C. Fletcher
Chairman

JCC:hmm

- c. Beth Mitchell, NMFS, Seattle
- Steven Morris, NMFS, Portland
- Cyreis Schmitt, WDFW
- Joseph Pavel, NWIFC
- Stephen Phillips, PSMFC