

PACIFIC FISHERY MANAGEMENT COUNCIL

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EXECUTIVE DIRECTOR
Lawrence D. Six

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b. Fletcher

Telephone: (503) 326-6352

June 21, 1996

Ms. Sarah Bransom
National Park Service
Denver Service Center
Resource Management - RP
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-0287

RE: Eiwha River Implementation EIS

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 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 been closely monitoring the status of the restoration of the Eiwha River ecosystem. In a letter of December 15, 1994, the Council provided its support for the preferred alternative (removal of both dams) outlined in the Draft Environmental Impact Statement. More recently, the Council voiced its support in a resolution of March 14, 1996 urging the acquisition and removal of the Eiwha and Glines Canyon Projects by the federal government at the earliest opportunity. Given these facts, we offer the following comments on the Eiwha Implementation Environmental Impact Statement.

Once again, the Council is impressed by the level of detail and thoroughness for the environmental documents prepared by the Department of Interior. The Council strongly agrees with the preferred alternative (and proposed action), which includes demolition of both mainstem dams and removal of accumulated sediments through natural river erosion processes. This alternative will result in the most rapid rehabilitation of the Eiwha River ecosystem. The alternative proposal (sediment management through dredging) adds considerable cost to the total project with no appreciable long-term benefits.

The Council continues to be very concerned about the status of salmon throughout their range along the West Coast. It is apparent that the decline in abundance is partially related to the failure of society to protect freshwater spawning and rearing habitats. The current situation in the Strait of Juan de Fuca (to which the Eiwha River drains) is an excellent case in point. Recent research has shown that coho production in the Strait has been well below viable target levels established by fishery managers. Degradation of freshwater habitat as a result of various land

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use practices has been identified as a major cause for the decline of Strait coho. The Council notes that in terms of coho production alone, a fully restored Elwha River will produce some 248,000 smolts annually. This number represents fully 65 percent of the current total smolt yield in the Strait of Juan de Fuca. This confirms our belief that the Elwha River represents the best restoration opportunity in the region.

Sincerely,

A handwritten signature in black ink that reads "Robert C Fletcher". The signature is written in a cursive style with a long horizontal flourish at the end.

Robert C. Fletcher
Chairman

JCC:hmm