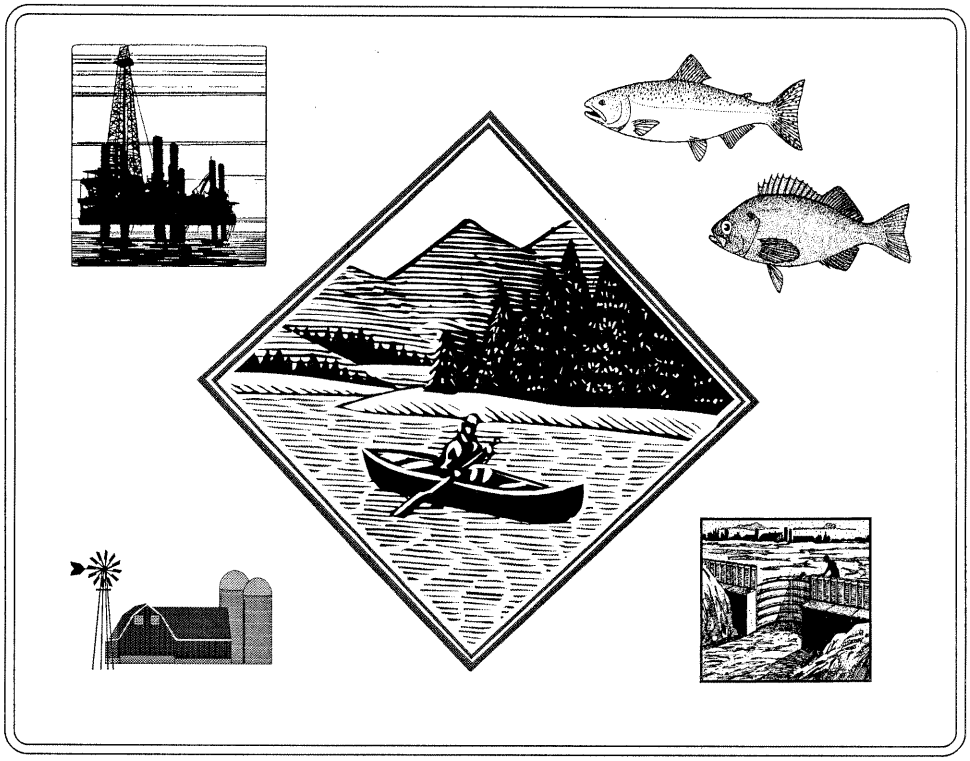
VITAL HABITAT CONCERNS



Pacific Fishery Management Council
Habitat Committee Steering Group

December 1996

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TABLE OF CONTENTS

LIST OF ACRONYMS AND ABBREVIATIONS

BOR	U.S. Bureau of Reclamation
cfs	cubic feet per second
Council	Pacific Fishery Management Council
CRP	Conservation Reserve Program
CVPIA	Central Valley Project Improvement Act
EIR	Environmental Impact Review
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FERC	Federal Energy Regulatory Commission
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPPC	Northwest Power Planning Council
TMDL	total maximum daily loads
USFWS	U.S. Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife

PREFACE

The Pacific Fishery Management Council's (Council) *Vital Habitat Concerns* was first published in 1994. It is a watershed-based assessment used to track progress in addressing concerns raised by the Council's Habitat Committee about of some of the most critical habitat issues affecting West Coast marine fish resources.

This document emphasizes anadromous salmonid habitat because numerous stocks of salmon and steelhead are at record low levels. Loss of habitat has been identified as one of the main reasons for their decline.

Many of the issues in this year's document were found in the 1994 and 1995 *Vital Habitat Concerns*. This reflects the continuing need for natural resource managers, policy makers, landowners, and the fishing community to keep a constant vigil in protecting and restoring the habitat upon which fish depend.

The information in this assessment is organized by **"Upland," "Nearshore,"** and **"Offshore"** zones. Within each zone, examples of problems that have chronically affected or could affect fish habitat are identified. Separate sections are included on California's Central Valley and the Columbia-Snake River System.

Each issue has a **"Council Action"** section that documents the Council's views on the corrective measures needed for each fish habitat issue. Replies received from the agency or entity to which a letter or resolution was directed are noted where applicable.

While the prime purpose of this document is to identify and track specific habitat issues, the Council also acknowledges the importance of coordination and cooperation among state and federal agencies, tribes, local constituents, non-governmental organizations and private landowners if those issues are to be resolved in a timely and cost-effective manner.

This document is for the edification of men and women in the fishing industry, as well as the conservation community and the general public. An informed and educated fishing community must be an active voice in the arena of fish habitat protection, whether it be national issues, such as the Clean Water Act, or the relicensing of a local hydroelectric project.

UPLAND ENVIRONMENT

CALIFORNIA'S CENTRAL VALLEY, SAN FRANCISCO BAY-DELTA, AND TRINITY RIVER

Examples of Species Affected: Anadromous salmonids, herring, crab, striped bass, delta smelt.

The federally operated Central Valley Project in California has reduced flows throughout the Trinity, Sacramento and San Joaquin River basins. Significant quantities of water, up to two-thirds of Trinity flows, have been diverted primarily for agriculture. Reduced inriver flow can result in longer downstream migration times for smolts, increased predation vulnerability for juveniles, loss of juveniles at diversion facilities, elevated stream temperatures, reduced dissolved oxygen and alternation of the estuarine environment. This has contributed to the decimation of the once large runs of salmon, as evidenced by the "endangered" status of the Sacramento River winter chinook and "threatened" status of the delta smelt. In 1996, concerns over the Sacramento winter-run salmon resulted in significant new restrictions for both recreational and commercial fisheries off California. Returns of winter chinook to the Sacramento River in 1996 and 1997 are expected to be especially low since the adults will be returning from brood escapements of less than 200 females.

Nonetheless, changes to the water allocation system mandated by the 1992 Central Valley Project Improvement Act (CVPIA) have given reason for limited optimism. The CVPIA made fish and wildlife preservation an authorized purpose of the project, including the dedication of an additional 800,000 acre-feet of water for fish and wildlife recovery. The implementation of the CVPIA is now the focus for salmonid restoration.

There are more than 20 major actions in the CVPIA that, if implemented, would benefit anadromous salmon. A final version of the U.S. Fish and Wildlife Services' Anadromous Fish Restoration Program, which has a goal of doubling anadromous fish runs, will be released in December 1996. Another positive action is the installation of new fish screens at the Glenn-Colusa Irrigation District's Hamilton City Pumping Project Plant, which is in progress.

Council Action:

1. August 23, 1995, letter to the Honorable Bruce Babbitt, Secretary of the Interior, encouraging accomplishment of CVPIA goals.

2. September 13, 1995, letter to the Honorable George Miller, California Congressman, responding to a request for Council assessment of the benefits of fish and wildlife provisions of the CVPIA.

   Response: No direct response. However, alternative legislation which would have weakened the positive fish and wildlife restoration features of the CVPIA failed to pass.

3. April 12, 1996, resolution passed in support of fisheries mitigation, enhancement, and restoration for the Central Valley Project.

   Response: June 21, 1996, letter from the California State Water Resources Control Board confirming that they will consider all relevant information regarding objectives necessary to protect fish and wildlife and other beneficial uses of the Delta during the triennial review of their 1995 water plan in 1998.

Future Council Action Needed:

1. Continue to track CVPIA implementation and Sacramento winter and spring run recovery efforts. Convene panel of federal and state fisheries and water management agencies, as well as water users, fishers, and other interests at a 1997 Council meeting in San Francisco.

2. San Joaquin River, continue to back efforts aimed at restoration of anadromous fish runs.

3. Continue to support efforts for establishing a mechanism to help fund screening of diversions.

4. Support stream flows necessary to allow restoration of anadromous fish production in the Trinity River.

5. Track the ongoing CalFed process. CalFed is a joint state/federal effort initiated to address problems in the Delta, such as ensuring reliable water supplies and restoring the ecosystem while protecting farming and other infrastructure at the same time. It has the potential to provide significant salmonid habitat restoration.

COLUMBIA-SNAKE RIVER HYDROPOWER, IRRIGATION, NAVIGATION AND FLOOD CONTROL OPERATION

Examples of Species Affected: Anadromous salmonids.

Historically, 10 to 16 million salmon and steelhead annually ascended the Columbia River and its tributaries. These runs have dwindled substantially, with numerous wild stocks being listed as either "threatened," "endangered," or at a "high risk" of extinction (Nehlsen et al. 1991). While many factors, including overharvest and poor hatchery practices are to blame for this population crash, habitat degradation has played a key role. In the Columbia River Basin, the hydroelectric system operation has been implicated in killing up to 95 percent of downstream migrating Snake River chinook smolts, as well as more than doubling the time it takes for them to travel from the Salmon River to the lower Columbia River.

The Snake River salmon recovery debate is focused on the timing, amount, rate and velocity of flow the U.S. Army Corps of Engineers and Bureau of Reclamation (BOR) allow through the system, and whether barging and trucking of juvenile salmon should be continued. The majority of state, federal and tribal fish biologists conclude that barging and trucking have not increased salmon survival and that unless there is an increase in flow rates for fish passage needs (and concomitant structural changes in the John Day and lower Snake River dams), recovery of upstream Columbia Basin salmon stocks will be in doubt. An October 1993 report to the Northwest Power Planning Council (NPPC) concluded that there is a "general relationship" between increasing salmon survival and increasing flows in the Columbia River Basin.

Reports prepared by the National Research Council (NRC) and the Independent Scientific Advisory Board (ISAB) could play a key role in future Columbia River Basin salmon habitat management. The NPPC and NMFS have cooperated in forming the 11 member ISAB to review scientific and technical information on Columbia Basin salmon survival. The ISAB report, which reviews the NPPC's Columbia Basin Fish and Wildlife Program, was released September 17, 1996.

Council Action:

1. November 16, 1993, resolution for the recovery of Snake River salmon.

2. April 15, 1994, letter to NPPC and NMFS urging prompt and effective actions to improve mainstem passage at dams.

Response: May 5, 1994, letter from Mr. Rolland A. Schmitten, Assistant Administrator for Fisheries, NMFS, noting ongoing reevaluation of measures in the biological opinion.

3. August 2, 1994, resolution in support of spill to pass juveniles at Columbia and Snake River dams.

4. April 5, 1995, Columbia and Snake Rivers salmon resolution.

5. April 1996, the Habitat Committee was charged with reviewing the NRC's report *Upstream: Salmon and Society in the Pacific Northwest.*

   Response: Report presented to the Council at the August 1996 meeting.

Future Council Action Needed:

1. Continue to track Columbia River hydropower operations.

2. Track proposed dredging of the Columbia River.

3. Review the ISAB report on Columbia River habitat management.

INSTREAM FLOW

Example of Species Affected: Anadromous salmonids, shellfish, other.

Insufficient instream flow is a significant fish habitat problem. Salmonids require clean, cool water for spawning and rearing. Sufficient instream flows are also necessary for adult anadromous salmonids to reach their spawning grounds and for juveniles to successfully emigrate downstream to the ocean. Competing water users sometimes do not leave enough water for fish and other instream flow needs. Too often, the amount of minimum instream flow needed by fish is not documented or enforced. In many instances, states have continued issuing water permits beyond the stream's ability to provide that water.

In addition, freshwater flows are important to the function of floodplains (including their riparian areas) and coastal estuaries. Estuaries are among the most productive natural systems and are important to salmon and numerous other commercially important species of fish and shellfish. Inadequate freshwater inflows damage estuarine dependent resources. Floodplains (and their riparian zones) are important to watershed health because they provide nutrients, large woody debris, and coho salmon winter habitat.

Council Action:

1. April 4, 1995 resolution supporting increased flows from the Potter Valley Project to the Eel River.

2. June 28, 1995 letter to the Honorable Bruce Babbitt, Secretary of Interior, urging resolution of the water spreading issue.

   Response: March 6, 1996 letter from Bureau of Reclamation Commissioner Mr. Eluid Martinez, affirming the Bureau's commitment to eliminating unauthorized water use, but noting the complexity of the issue and acknowledging that no firm schedule has been set to end such abuse.

Future Council Action Needed:

1. Continue to track the issue.

2. Encourage Federal, state, and local efforts aimed at instream flow conservation.

SCREENING OF WATER DIVERSIONS

Examples of Species Affected: Anadromous salmonids.

There are thousands of unscreened or inadequately screened irrigation diversions in the West. A review of the needs and accomplishments in screening is presented below by state.

California: In 1996, an estimated 2,698 water diversions in the Sacramento River and Delta remain unscreened (Jim Hopelain, Personal Communication). These unscreened diversions are estimated to take 10 million salmon juveniles each year (NMFS, Personal Communication, 1996).

Idaho: In 1995, the Idaho Department of Fish and Game (IDFG) anadromous fish screen program successfully treated 43 sites in chinook salmon habitat utilized by stocks listed under the ESA. Of this total, eight diversions were eliminated by consolidation or conversion to ground water. In 1996, IDFG intends to implement approximately 50 screening projects.

Hundreds of Salmon River pump-intakes also remain untreated. In 1994, approximately 238 pump-intakes were identified in the Salmon River Basin from Idaho Department of Water Resources' (IDWR) records. It is likely that nearly all of these pump-intakes will require fish screens to protect endangered juvenile chinook salmon. However, because of the priority on gravity diversions, IDFG has not yet treated any of the pump diversions. In 1996, IDFG will work on high priority pump-intakes as time and funding allows (Columbia Basin Fish and Wildlife Authority [CBFWA], 1996).

Oregon: Above Bonneville Dam, the Oregon Department of Fish and Wildlife (ODFW) has fish screen programs in Northeast Oregon for the Grande Ronde, Imnaha, John Day, Umatilla and Walla Walla subbasins, and in Central Oregon for the Deschutes, Fifteenmile and Hood River subbasins. In 1995, ODFW treated 49 gravity diversions and 31 pump-intake fish screens. In 1995, the majority of ODFW's fish screen work was accomplished in the Grande Ronde and Imnaha subbasins, which provide habitat for Snake River spring/summer chinook salmon and steelhead.

In 1996, in the Northeast region, ODFW intends to complete work on about 20 diversions within the critical habitat of listed chinook salmon in the Grande Ronde Subbasin. Work may also begin in the John Day Basin. The vast majority of the John Day River screens, which were built in the 1950s and 1960s must be replaced (CBFWA, 1996).

Washington: In 1995, the Washington Department of Fish and Wildlife (WDFW) installed new fish screens or upgrades in five gravity diversions and seven pump-intakes. An additional 27 pump-intake screens will be installed in the Methow Subbasin before the 1996 irrigation season. Gravity diversion fish screen projects in the Methow, Wenatchee, and Entiat subbasins are contingent upon increased Mitchell Act funding over the next two to three fiscal years. In 1996, several other large Yakima Phase II fish screens will likely begin construction, including Yakima-Tieton (350 cfs), WIP Upper (100 cfs), Union Gap (70 cfs), Ellensburg Mill (40 cfs), Fruitvale (34.4 cfs) and Bull (30 cfs) (CBFWA, 1996).

Council Action:

1. March 10, 1995, resolution in support of California Consolidated Farm Services Agency efforts to provide financial assistance for fish screening.

2. August 15, 1995, resolution in support of adherence to state and federal fish screening criteria (including actual criteria for each state and NMFS as an attachment for interested persons).

Future Council Action Needed:

1. Urge agencies to continue funding of screening programs.
2. Maintain public awareness of the magnitude of the remaining problem.

UPLAND LAND USE PRACTICES AND POLLUTED RUNOFF

TIMBER HARVEST, ROAD BUILDING, AND PESTICIDE APPLICATION

Examples of Species Affected: Anadromous salmonids.

Past timber harvest practices, such as splash damming, severely damaged fish habitat by removing spawning gravels and woody debris. More recently, attention has been placed on the impacts to fish habitat from riparian zone management and road building. Numerous scientific studies have closely linked the importance of large woody debris and streamside vegetation to salmonid survival. Streamside trees and vegetation provide shade to keep stream temperatures cool. Large woody debris provides nutrients, shade and habitat complexity. Once these areas are disturbed (e.g., removal of large streamside trees), more solar energy reaches the stream, causing elevated stream temperatures deleterious to salmonid survival. Side channels and stream-associated wetlands provide calm water refuges for coho salmon during high winter flows. Research indicates that most of the sediment that enters the stream from silvicultural practices can be traced to erosion from poorly designed roads and culvert failures (Yee and Roelofs 1980).

Recently completed studies following the 1996 floods in Oregon link increased landslide activity to areas of clear-cuts and roads (Pacific Watershed Associates, 1996).

Improper use of pesticides and herbicides in silvicultural management can also affect water quality and aquatic resources.

Council Action: April 8, 1994, resolution supporting cooperation in watershed planning and assessment (mailed to several federal, state, and local entities within the Council management area).

Future Council Action Needed: Continue to track the issue, especially with regard to recent and pending wild fish restoration plans in California and Oregon.

MINING

Examples of Species Affected: Anadromous salmonids.

Watersheds in the West are still being impacted by past and present mining practices. Research in California's Salmon River (Klamath National Forest) found that hydraulic mining of the main river valleys, which took place from about 1870 through 1950, produced approximately 15.8 million cubic yards of sediment. The effects of all this sediment are still impacting salmon habitat today.

Cyanide heap-leach gold mining has the potential to adversely impact anadromous fish habitat if runoff from sites is not properly contained. Mine exploration and development, along with associated wetland fills and road construction, may increase downstream sedimentation. Impacts to aquatic life may also result from chemical contamination in accidental spills and leaks from heap-leach pads, leachate from acid-forming tailings, and catastrophic failure of waste material storage areas. Hydraulic suction gold dredging may cause sedimentation, disturbance of adult salmon and steelhead, entrainment of eggs and sac fry and may affect bank stability.

Council Action: None to date.

Future Council Action Needed: Continue to track the issue.

GRAZING

Examples of Species Affected: Anadromous salmonids.

Poor grazing management has substantially degraded many streams, rivers, and wetlands in the Western U.S. (Armour et al. 1991). When livestock are allowed to enter stream riparian areas for extended periods, they graze down and trample overhanging vegetation. This results in increased sedimentation, elevated stream temperatures, unstable banks, decreased food sources and loss of riparian diversity. As the stream widens and shallows, the water table may be lowered.

In August 1995, the Bureau of Land Management (BLM) announced its new grazing regulations package. Included in the new regulations are Resource Advisory Councils to help design the standards and guidelines to achieve rangeland health standards, and penalties for violations of laws protecting water quality and stream courses.

Council Action: None to date.

Future Council Action Needed: Continue to track the issue.

HYDROELECTRIC DEVELOPMENT (OUTSIDE THE COLUMBIA RIVER BASIN)

Examples of Species Affected: Anadromous salmonids.

Numerous dams licensed under the Federal Energy Regulatory Commission (FERC) have blocked or impeded access to thousands of miles of spawning and rearing grounds of anadromous salmonids. These dams include the Grand Coulee and Chief Joseph (Columbia River), Hells Canyon (Snake River), Keswick (Sacramento River), Pelton and Round Butte (Deschutes River), and Trinity and Lewiston (Trinity River) Dams. The Federal Energy Regulatory Commission (FERC) has already begun preconsultation discussions on the relicensing of the Hells Canyon (license expires July 31, 2005) and Pelton projects (license expires December 31, 2001). Relicensing of many other projects will soon be under way, including all the Snake River-Idaho Power projects. Relicensing of several other hydroelectric projects has already commenced. Environmental Impact Statements (EIS) for the Condit Dam (White Salmon River, Washington), Leaburg-Waterville Project (McKenzie River, Oregon), Elwha and Glines Canyon dams (Elwha River, Washington), and the Cushman Project (Skokomish River, Washington) are being or have been prepared. Restoration of historical anadromous fish production areas will be an important consideration in all of these licensing procedures.

Council Action:

1. December 8, 1993, letter to the Honorable Bruce Babbitt, Secretary of Commerce, concerning adequate flows for the migration, spawning and rearing of Klamath River fall chinook.

   Response: April 6, 1994, letter from Ms. Elizabeth Ann Rieke, Assistant Secretary for Water and Science, Department of Interior, reporting on the actions the Bureau planned to take to assist survival of anadromous fish in the Klamath Basin.

2. June 2, 1994, letter to Ms. Elizabeth Moler, Chair, FERC, concerning licensing of the Cushman Project on the North Fork Skokomish River.

3. October 25, 1994, resolution in support of anadromous fish restoration in the White Salmon River, Washington.

4. October 25, 1994, resolution in support of providing adequate flow releases at Iron Gate Dam to ensure protection of Klamath River anadromous fisheries.

5. November 3, 1994, letter to Ms. Lois Cashell, Secretary, FERC, noting the Council's October 25, 1994, resolutions for Iron Gate and Condit Dams.

   Response: December 21, 1994, letter from Mr. Fred E. Springer, Director, Office of Hydropower Licensing, FERC: (1) acknowledging the Council's position on Condit Dam and (2) supportive of meeting minimum flows below Iron Gate Dam, but noting lack of authority to direct allocation and release of water from Upper Klamath Lake. Willing to consider results of any flow study.

6. November 16, 1994, letter to Mr. Roger Patterson, Regional Director, Mid-Pacific Region, BOR, regarding operations at Klamath River's Iron Gate Dam.

7. December 15, 1994, letter to Ms. Sarah Bransom, National Park Service, comments on the DEIS supporting full restoration of the anadromous fish resource in the Elwha River system.

8. March 14, 1996, resolution in favor of restoration of the Elwha River, Washington.

   Response: May 24, 1996, letter from Mr. David Morris, Superintendent, Olympic National Park, acknowledging Council comments.

9. June 21, 1996, letter to Ms. Sarah Bransom, National Park Service, commenting on the Elwha River Ecosystem Restoration Implementation Draft Environmental Impact Statement in support of demolishing both dams and recovery through natural river erosion process.

Future Council Action Needed:

1. Track progress in removal of Oregon's Savage Rapids Dam.

2. Track Condit and Cushman relicensing progress with attention to anadromous fish restoration above Condit Dam.

3. Continue to advocate Elwha Dam removal and ecosystem restoration.

4. Convene a panel of federal, state and public representatives to inform the Council on FERC licensing activities in the region and help coordinate effective fishery habitat restoration and protection measures under the relicensing procedures.

AGRICULTURE

Examples of Species Affected: Anadromous salmonids.

Besides impacting fish habitat through water withdrawals and irrigation methods, poor agricultural practices can alter riparian areas and instream habitat through removal of riparian vegetation, stream channelization and bank hardening, drainage of wetlands, and chemical or organic contamination. These activities have lead to increased stream sedimentation, increased water temperature, loss of stream length and pool volume, and loss of large woody debris as habitat for channel stabilization.

Council Action: None to date. The Habitat Committee has had presentations on monitoring of pesticide impacts and continues to track the issue.

Future Council Action Needed: Query agriculture departments as to their progress in addressing agricultural pollution, especially non-point sources.

URBAN GROWTH AND LAND CONVERSION

Examples of Species Affected: Anadromous salmonids.

Population growth and the subsequent conversion of forest and agricultural lands to urban, suburban and rural residential uses have a variety of negative effects on fish resources. For salmonids in freshwater these effects include the following:

- Direct loss of stream and riparian habitat to road and building site construction and maintenance,
- loss or partial obstruction of upstream and/or downstream migration due to culverts and bridges, and diversion dams,
- increased winter streamflows and reduced summer streamflows caused by increased impervious surfaces and stormwater runoff,
- reduced streamflows resulting from water diversion,
- elevated stream temperatures, chemical contamination, and stream and streambed sedimentation, and
- increased disturbance, harassment and poaching of spawning salmon adults by humans.

For salmonids in marine water and for other marine fish, particularly within urban areas, shoreline vegetation clearance, bulkheading, filling and dredging, and point and non-point pollution have resulted in the loss of the following essential fish habitat resources:

- shallow water migration routes and spawning areas,
- marine and shoreline vegetation and intertidal wetlands, and water quality.

Council Actions: Identification of negative impacts on Puget Sound chinook and coho stocks in a 1992 status report.

Future Council Action Needed: Continue to track the issue.

NEARSHORE ENVIRONMENT

COASTAL WETLANDS

Examples of Species Affected: Anadromous salmonids, herring, crab striped bass, delta smelt.

For numerous species of marine fish and shellfish, coastal wetlands (non-freshwater) are absolutely essential. Salt water marshes, mangrove swamps, tidal flats, and associated freshwater wetlands provide critical habitats for spawning, feeding and migration. As a nationwide average, about 75 percent of commercially caught fish and shellfish are composed of estuarine-dependent species, 52 percent in the Northwest. The commercial catches of these wetland-dependent fish and shellfish contribute about $5.5 billion to the national economy annually (Chambers 1992). Recreational landings of estuarine-dependent fish are estimated to have a total economic impact of $8.2 billion annually (Prosser et al. 1988). According to the National Oceanic and Atmospheric Administration (NOAA) and USFWS, there are over 27 million acres of coastal wetlands in the lower 48 states. Estimates are that we have lost about half of our historical coastal wetlands (Johnston et al. 1992).

Council Action:

1. December 10, 1991, letter to the Environmental Protection Agency expressing concern over proposed changes to the *Federal Manual for Identifying and Delineating Jurisdictional Wetlands.*

2. April 22, 1992, letters expressing concern for protection of wetlands and other fishery habitat to State of Washington Department of Ecology, Forest Practices Board, Department of Community Development, Department of Trade and Economic Development and pertinent county commissioners; and the U.S. Army Corps of Engineers.

Future Council Actions Needed: Continue to track the issue, especially with regard to attempted changes in federal and state regulations protecting wetlands.

CONTAMINANTS

POINT SOURCE POLLUTION

Examples of Species Affected: Anadromous salmonids, groundfish, salmon, crab, coastal pelagic species.

The nation's estuaries and coastal waters are the ultimate repository for pollutants from urban and agricultural sources. Industrial discharges account for 90 percent of the inputs of cadmium, mercury and chlorinated hydrocarbons into marine waters, while municipal sewage treatment facilities contribute half the biological oxygen demand, total nitrogen, oil and grease (U.S. Congress 1987). Studies by NOAA (1988) indicate that on the West Coast, very high contaminant levels are found in San Francisco Bay, Santa Monica Bay, Long Beach Harbor, San Diego Bay, and in the Eagle and Duwamish harbors of Puget Sound.

In the Columbia River Basin, pulp and paper mills contribute dioxin and furans.

Radioactive chemicals have been released from the Hanford nuclear facility. Concerns have been raised that if Hanford radioactive wastes are not properly contained, resident and anadromous fish species may be impacted.

Point and non-point sources contribute water pollutants such as organic pollution (sewage enrichment, nitrogen, and phosphorus), dioxin and furans, heavy metals (arsenic, mercury, copper, cadmium, chromium, and lead), pesticides (herbicides, insecticides, and fungicides), wood preservatives and hazardous materials including PCB's, trichlorethylene, benzenes, and phenols (Wild Systems 1994).

Council Action: January 10, 1990, letter of concern to Oregon Department of Environmental Quality (DEQ) on dioxin in the Columbia River.

Future Council Action Needed: Continue to track the issue.

POLLUTED RUNOFF

Examples of Species Affected: Anadromous salmonids.

According to the Environmental Protection Agency (EPA), the harm from polluted runoff (non-point source pollutants) may even exceed that from point source discharges. Polluted runoff includes chemicals and/or sediments from agricultural, grazing, mining, and timber harvesting activities, as well as the lead, chromium, zinc, copper, and oil from urban streets.

State water quality agencies have only just begun to respond to polluted runoff problems. Under the Clean Water Act, if water quality limits beneficial uses in a watershed, an enforceable management plan must be developed which sets total maximum daily loads (TMDL).

According to the Oregon DEQ:

> The 1972 federal Clean Water Act (section 303(d)) requires each state to identify streams, rivers and lakes that do not meet water quality standards. These waters are referred to as "water quality limited" and states are required to establish a list of these waters - referred to as the 303(d) list. The list is only meant to identify the water quality problems of the stream, river or estuary and not the cause. The cause of a water quality problem is investigated later as management plans are developed to correct water quality problems. The list includes both urban and rural rivers and streams." The final list contains approximately 870 stream, stream segments, lakes, and estuaries. Approximately 477 of these are listed exclusively for temperature. This is much larger than in previous years due to the new guidelines from EPA.

Oregon's draft 303 (d)(1) list includes many anadromous fish streams where the beneficial uses are not protected or only partially supported for aquatic life. Water quality standards for fecal coliform, pH, and/or dissolved oxygen are sometimes exceeded in the Deschutes, Wallowa, Grande Ronde, John Day, Klamath, Sandy, Willamette, Siuslaw, Yaquina, Clatskanie, Kilchis, Wilson, Umpqua, Rogue, and Coquille Rivers.

In early August, 1996 the Oregon DEQ will reopen the list for public comment for new or additional data not received during the first comment period and, if appropriate, the list will be revised and submitted to EPA in early 1997.

Council Actions: None to date.

Future Council Action Needed: Continue to track the issue.

OFFSHORE ENVIRONMENT

OIL AND GAS EXPLORATION AND TRANSPORTATION

Examples of Species Affected: Groundfish, salmon, coastal pelagics, crab.

While offshore oil exploration and drilling receive considerable attention, only 2 percent of the input of petroleum into the world's oceans result from offshore production activities (45 percent result from tanker operations, spills at terminals, bilge and fuel oil flushing, and ship accidents; 36.5 percent from municipal and industrial wastes and runoff; 7.7 percent from natural seeps; and 9.2 percent from atmospheric deposition (National Research Council 1985; Boesch and Rabelais 1987).

Council Action:

1. Two letters in March, 1988, expressing concern over offshore oil and gas leasing and impacts from seismic surveys.

2. April 24, 1991, letter expressing concern that offshore oil and gas leasing proposals not be allowed in important fish habitat that may be set aside in marine sanctuaries.

Future Council Action Needed: Continue to track the issue.

DREDGE SPOIL DISPOSAL

Examples of Species Affected: Groundfish, crab.

Dredged sediments are the last materials legally allowed to be disposed of in U.S. ocean waters. All other substances were banned in 1988. Concerns have been raised in the fishing community when ocean disposal of contaminated sediments threatens fish spawning, nursery and feeding areas. In December 1994, the Interagency Working Group on the Dredging Process released a new dredging policy. The federal policy has been criticized for not acknowledging, or making meaningful recommendations for managing, the threat posed by contaminated sediments.

In April 1996, "The Long Term Management Strategy For the Placement of Dredged material in the San Francisco Bay Region" was released.

Council Action: Letters of July 21, 1989 and January 22, 1993 providing comments on the management of offshore dredge spoil deposition resulting from dredging in San Francisco Bay.

Future Council Action Needed: Continue to track the issue.

NEW ISSUES FOR 1996/1997

Salvage Rider and Salvage Logging: Passed in 1995 as part of the Rescissions Bill, the Salvage Logging Rider has caused great consternation in the conservation community, in part because the law also resulted in the logging of old growth "green" trees. Concerns have been raised about the impact of these sales on anadromous fish habitat. The concept of salvage logging is also controversial.

Fishing Gear Impact on Fish Habitat: The impact of fishing gear on bottom habitat, especially "brittle" bottom habitat, has been widely debated. The Habitat Committee will invite the Council's Groundfish Advisory Subpanel to join with us in collecting background information on this topic and in providing input for a study design on the effects of fishing gear on bottom habitat along the West Coast.

Guadalupe River, California: The Guadalupe River, flowing through the City of San Jose and into the South San Francisco Bay, currently supports runs of steelhead and fall chinook salmon with some fall chinook spawning within the downtown corridor. The Guadalupe is currently undergoing significant changes in the form of a U.S. Army Corps of Engineers/Santa Clara Valley Water District flood control project and construction of a city park. On May 1, 1996 fisheries organizations sent a letter to the Army Corps of Engineers requesting that the ongoing flood control/park project be modified to protect salmon and steelhead. On May 22, 1996 the **Natural Heritage Institute**, representing the **Guadalupe-Coyote Resource Conservation District**, filed a 60-day intent to sue notice under Section 505 of the Clean Water Act regarding the Guadalupe River Flood Control Project.

Ocean Environment: The impact of the ocean environment, specifically El Niño events, on fish stocks is just beginning to be understood. The Habitat Committee will request experts on these topics to make a presentation in the coming year. Development of further information may also be desirable to determine the role played by certain sections of nearshore habitat (e.g., Cordell Bank) as sources of larval and juvenile fishes to populate other areas.

Hydraulic Continuity: The connection between groundwater and surface water (hydraulic continuity) has become an important fish habitat issue. While groundwater pumping is an alternative to surface water diversion, the groundwater pumping causes reduction in surface flows, especially low summer flows which are derived from discharging groundwater. Discharging groundwater provides thermal moderation and important aquatic habitat. Groundwater pumping eventually results in equivalent reduction in instream flow. Groundwater permitting by the states and watershed alteration can result in diminished discharge to streams and are important fishery habitat issues deserving vigilance by natural resource managers (Personnel Communication, Tom Ring, Yakama Indian Nation, 1996).

Hanford Nuclear Reservation: In 1996, the Habitat Committee heard concerns from a fish processor about cesium contaminated groundwater from the Hanford Nuclear Reservation entering the Columbia River. The result of this could be that salmon and steelhead juveniles become contaminated, and then potentially enter the mixed stock salmon fishery on the West Coast. This could result in uncertainty about product quality, especially among Asian nation salmon buyers. The Council also heard from a company which markets a product that freezes nuclear waste in place (Cryocell). The Habitat Committee was unable to agree on a resolution regarding its concern on nuclear contamination. The Habitat Committee will continue to gather information on this topic.

Oregon/Washington 303 D list: States are reuquired under Section 303(d) of the Clean Water act to prepare a list every two years of waters (streams, rivers, lakes, and estuaries) not expected to meet state water quality standards after the implementation of technology-based contrtols. These waters are referred to as "water quality limited" and states are required to establish a list of these waters - referred to as the 303(d) list. The list only identifies the water quality problems of the waterbody. The cause of a water

quality problem is investigated later as management plans are developed to correct water quality problems. The list includes both urban and rural waterbodies. Oregon is accepting comments on its 303(d) list through November 1, 1996. Washington sent its list to the EPA in the summer of 1996.

California/Oregon Coastal Salmon Recovery Efforts: Track the progress of the Oregon and California coastal salmon recovery initiatives. Convene a panel to inform the Council of these efforts and their relation to other natural fishery habitat restoration efforts such as that under For the Sake of Salmon.

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APPENDIX A
COUNCIL HABITAT RESOLUTIONS AND CORRESPONDENCE JUNE 1995 THROUGH OCTOBER 1996

PACIFIC FISHERY MANAGEMENT COUNCIL

CHAIRMAN
Frank R. Warrens

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

EXECUTIVE DIRECTOR
Lawrence D. Six

June 28, 1995

The Honorable Bruce Babbitt
Secretary of the Department of Interior
149 C. St. NW
Washington D.C. 20240

SUBJECT: U.S. Bureau of Reclamation Water Spreading Policy

Dear Secretary Babbitt:

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. To protect Columbia River salmon stocks, recreational, commercial and tribal salmon fishing seasons in both 1994 and 1995 have been severely restricted. However, the recovery of Columbia River salmon stocks must also include actions to protect and restore the habitat upon which these fish depend.

In view of the fishery habitat concerns specified in the MFCMA, the Council supports the considerable effort that went into the Bureau of Reclamation's preparation of a Draft Water Spreading Policy in 1994. Unfortunately, we have recently learned that Reclamation is not inclined to follow through with a final policy, which should have been completed by October 1994.

"Water spreading," the unauthorized use of federally developed project facilities or water supplies on lands not approved by Reclamation for such use, has significant environmental and economic consequences. These include reduced instream flows and negative impacts on fisheries, water quality and Reclamation project repayment. Water spreading also ignores tribal treaty rights for which the United States has a trust responsibility.

The Department of Interior Inspector General's July 1994 report criticized Reclamation for failing to eliminate unauthorized uses of project water. This report, which covered only 24 projects, estimated that large amounts of water were involved and resulted in a cost to taxpayers of millions of dollars annually. It states that about three-fourths of the water delivered to ineligible lands associated with the 24 projects could have been used to improve stream flows for protected species or to reduce potentially toxic irrigation drainage. The rest of this water could have been used to help meet additional requirements for Indian fisheries, Indian water rights, or municipal and industrial water supplies. Commissioner Dan Beard indicated in his July 19, 1994, statement to the House Committee on Natural Resources that "Reclamation has collected sufficient overview data to know that water spreading is a significant problem and is occurring in all five Reclamation regions."

Many Reclamation projects affect Pacific salmon. In addition to legal withdrawals, water spreading directly and cumulatively impacts instream flow for salmon in numerous watersheds. Currently, the need for flows to support protected salmon species is particularly acute. In some areas, millions of dollars are being spent by taxpayers and electric utility rate-payers on flow enhancement and fisheries restoration projects to ameliorate adverse conditions as a result of Reclamation project irrigation withdrawals. The National Marine Fisheries Service's March 1995 Proposed Recovery Plan for Snake River Salmon (measure 2.1.c.7) calls on Reclamation and state water resource departments to identify and halt water spreading on Reclamation projects in the Columbia River Basin by April 1996. The Northwest Power Planning Council's Columbia River Basin Fish and Wildlife Program has a similar measure addressing water spreading. Both plans recommend that water found to be diverted for unauthorized purposes be made available for instream use.

We believe that Reclamation's June 1994 draft policy made a good start toward resolving the water spreading problem, following through on the Clinton Administration's commitment to our nation's natural resources. However, it is doubtful that these cases will ever be resolved at the Reclamation field office level without a strong commitment from the Headquarters level.

Therefore, we urge that Reclamation Headquarters oversee the water spreading issue and not simply pass the problem along to the next Administration. Further, we request that you apprise the Council of the specific details of Reclamation's latest plans to resolve water spreading.[1/]

In closing, we believe that where water spreading occurs fish production will continue to suffer and uncertainty will continue for farmers until the problem is permanently resolved. It is very important that Reclamation continue to receive regional input in this process, including tribal and fishing interests, as well as water users. We look forward to your cooperation in a positive and timely resolution of this issue.

Sincerely,

Lawrence D. Six
Executive Director

c: Jack Donaldson
John W. Keys III
Roger G. Patterson
Rolland Schmitten
William Stelle
Habitat Steering Committee, Northern and Southern Panels
Columbia River Inter-tribal Fish Commission
Northwest Indian Fisheries Commission

1/ At 16 U.S.C. § 1852 (i)(2), a federal agency is required to provide a detailed written response to Council comments within 45 days. That response shall include a description of the measures being considered by the agency for mitigating or offsetting the impact of the activity on anadromous fish habitat.

United States Department of the Interior

BUREAU OF RECLAMATION
Washington, D.C. 20240

IN REPLY REFER TO:
W-1510

MAR 06 1996

Mr. Lawrence D. Six
Executive Director
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Dear Mr. Six:

Thank you for your letter supporting our efforts to eliminate unauthorized uses of Bureau of Reclamation project water. Reclamation is committed to eliminating unauthorized use and to take steps to prevent future unauthorized use of Reclamation project waters. As a result of our review of this situation, we now better understand the extent and nature of the problem. Resolving unauthorized use is going to be time consuming, complex, and sensitive in nature. Reclamation has over 8700 contracts, 90 years of legislation, and hundreds of court decisions that must be considered in resolving this issue. It is our judgement that we will need to resolve each instance of unauthorized use on a case-by-case basis. Resolution of unauthorized use must be done in conjunction with the states and in recognition of western water law. For example, we are currently making progress in resolving the situation in the Umatilla Basin in northeastern Oregon. This is and will continue to be a slow and tedious process.

The Inspector General's Report on unauthorized use has certainly helped Reclamation focus on the issue. I have asked the staff to analyze a number of options. At this time, I have not set a firm schedule for implementing a plan to end unauthorized use.

If you would like to discuss this further, Zell Steever, of my staff, is handling this and can be reached at (202) 208-4787. We appreciate your continuing interest in bringing this matter to resolution.

Sincerely,

FOR Eluid L. Martinez
Commissioner

PACIFIC FISHERY MANAGEMENT COUNCIL

CHAIRMAN
Frank R. Warrens

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

EXECUTIVE DIRECTOR
Lawrence D. Six

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.

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,

John Coon

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

PACIFIC FISHERY MANAGEMENT COUNCIL

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CHAIRMAN
Frank R. Warrens

EXECUTIVE DIRECTOR
Lawrence D. Six

August 23, 1995

The Honorable Bruce Babbitt
Secretary of the Department of Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Babbitt:

In 1992, in response to the long standing decline in numerous Central Valley anadromous fish populations, and in the recreational and commercial fisheries associated with them, Congress passed the Central Valley Project Improvement Act (CVPIA). The Pacific Fishery Management Council believes the CVPIA addresses those declines in a reasonable and holistic fashion, and provides for a comprehensive solution to the problems causing the declines. Given the important role which the Bureau of Reclamation (BOR) and the U.S. Fish and Wildlife Service (USFWS) must play in the implementation of the CVPIA, the Council wishes to take this opportunity to express our concerns, and to express support for your timely and effective implementation of these important fishery mitigation measures.

Among the beneficial provisions in the CVPIA, the Council views two as especially key to meaningful and successful restoration of salmon and steelhead stocks. Those key provisions are (1) an allowance for 800,000 acre-feet of water for Central Valley fisheries and wildlife purposes and (2) the provision for 340,000 acre-feet for interim Trinity River flows while studies and an Environmental Impact Statement are completed to more precisely determine the actual flow needs.

Many naturally produced Central Valley salmon stocks have been reduced to chronic low levels due to water diversion activities, and the need for adequate river flows is long overdue to prevent further listings under the Endangered Species Act and to allow for robust salmon fisheries. Effectively utilizing no less than the full 800,000 acre-feet of storage available to fishery and wildlife purposes in the Central Valley is extremely important to the future health of the ocean salmon fishing industry for California and southern Oregon.

Adequate Trinity River flows also are extremely important to ocean salmon fishery management as abundance of Klamath River fall chinook is one of the key factors in determining ocean fisheries off California and southern Oregon. Despite extensive reductions in ocean and river harvest, the natural spawning escapement floor for Klamath River fall chinook (35,000 adults) has not been met for five years. Until comprehensive flow studies are completed, it is not possible to know if the interim 340,000 acre-feet of storage provided under the CVPIA for Trinity River flows will be sufficient to assure long-term productivity of natural stocks in the Klamath River Basin.

The Council strongly supports the fishery goals, objectives, and provisions of the CVPIA, in particular, the Anadromous Fish Restoration Program being developed pursuant to the legislation. To date, implementation of the CVPIA fishery habitat provisions promises to produce beneficial results to anadromous fish populations and to the fisheries they sustain. The Council notes the work already

accomplished by the BOR and the USFWS in implementing these programs and encourages continued impetus in the remaining implementation of the fisheries mitigation, enhancement, and restoration provisions of the CVPIA.

Sincerely,

Lawrence D. Six
Executive Director

JCC:sjk
c: Roger G. Patterson
Michael J. Spear
Rolland Schmitten
Hilda Diaz-Soltero

PACIFIC FISHERY MANAGEMENT COUNCIL
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

CHAIRMAN
Frank R. Warrens

EXECUTIVE DIRECTOR
Lawrence D. Six

Telephone: (503) 326-6352

September 13, 1995

The Honorable George Miller
Ranking Minority Member
Committee on Resources
1329 Longworth House Office Building
Washington, DC 20515

Dear Congressman Miller:

Thank you for consulting with the Pacific Fishery Management Council (Council) regarding the health of California salmon stocks and the existing and anticipated benefits of implementing the Central Valley Project Improvement Act (CVPIA). As you may be aware, the abundance of chinook salmon off the central coastal area of California was quite high this season.

Council Response to Questions Regarding Central Valley Salmon Stocks

Question #1 - Reasons for Increased Salmon Abundance

The Council, in reviewing possible explanations for the high chinook salmon abundance, has identified several factors which may have contributed to the increase in salmon production.

Ocean productivity along the California coast increased in 1993, returning to more favorable conditions for salmon survival. In addition (as more fully described below), the survival of juvenile Central Valley chinook salmon spawned in 1992 and 1993 benefitted from Central Valley Project flow management actions in 1993 and 1994. These progeny provided much of the increased ocean harvest in 1995 as age-2 and age-3 fish.

Inland chinook salmon habitat conditions are a decisive factor in the survival of juveniles and subsequent adult population sizes. The CVPIA was signed into law in October 1992 and the initial substantial effort to implement provisions of the act occurred in 1993 by the use of the 800,000 acre-feet of Central Valley Project yield for fish and wildlife purposes.

In 1993, the U.S. Fish and Wildlife Service (Service) provided the U.S. Bureau of Reclamation (Bureau) its prescription for the use of the 800,000 acre-feet by requesting springtime pulse flows in the upper and lower Sacramento River, in the Stanislaus River, and in the lower San Joaquin River. The Service also requested springtime restriction on Delta pumping and closure of the Delta Cross Channel gates. The Service further recommended spawning and rearing flow improvements in the upper Sacramento, lower American, and Stanislaus rivers in fall and early winter. The Service's final request for 1993 was to retain a portion of the dedicated yield as carryover storage in New Melones Reservoir as a contingency against

future drought-induced reductions that would adversely affect San Joaquin Basin salmon. The Service's prescriptions for the 800,000 acre-feet were similar in 1994. The 1993 water allocation benefitted the progeny of salmon that spawned in 1992 and the 1994 allocation benefitted the progeny of salmon that spawned in 1993.

Cumulatively, we believe the aforementioned factors, along with effective use of hatchery production, led to the high abundance of salmon during the 1995 season.

Question #2 - Benefit of Making Fish and Wildlife a Project Purpose

The inclusion of fish and wildlife as a project purpose of the Central Valley Project will provide benefits to Central Valley salmon stocks. The inclusion may enable the Secretary of the Interior, the Service, and the Bureau to justify actions which benefit fish and wildlife resources, but probably not beyond actions reasonably expected to be accomplished through the CVPIA Restoration Fund.

The recent Delta Accord and the State Water Resources Control Board's new Delta Water Quality Standards, biological opinions for Delta smelt and winter-run chinook salmon, and elements of the CVPIA must be carefully meshed to help protect and restore Central Valley salmon. Operation of Shasta Dam, installation of the Shasta temperature control device and modified operation of the Red Bluff Diversion Dam are key elements of the CVPIA which could provide substantial benefits for salmon. Those operations and construction projects are also either directly or indirectly required by the National Marine Fisheries Service's biological opinion for winter-run chinook salmon.

Overall, identifying salmon as a project purpose of the Central Valley Project, together with the other regulatory and administrative processes within the Central Valley, are providing, and can be expected to provide, cumulatively higher benefits for salmon than individual actions mandated or required through other legal processes.

Question #3 - Benefits from Dedication of the 800,000 acre-feet to Fish and Wildlife

The Council is cautious about the potential benefits of the future dedication of 800,000 acre-feet of water for the protection and restoration of Central Valley salmon populations. It is our understanding that the Bureau has not given up title to the 800,000 acre-feet and that the Service is not requesting that it receive title. The Bureau and the Service will meet to develop operations so that all water in the Central Valley Project is moved in a manner to provide benefits toward fishery productivity and toward meeting otherwise mandated fishery flows. The 800,000 acre-feet will then be identified for movement through the system to augment flow from water delivery and storage actions. The two agencies agree that the Bay/Delta Water Accord, signed December 15, 1994, makes the commitment that the Central Valley Project share of water contributions to the Delta will come from the 800,000 acre-feet. In addition, if some of the dedicated water can be recaptured after it has served its identified purpose, the Bureau may be free to do so.

It is our understanding that only a portion of the dedicated water will be used to directly benefit salmon. We believe protective measures for endangered species and for Delta outflow to protect other native Delta species will have equal or greater importance in apportioning this water.

Question #4 - Trinity River Flows

The Council confirms that the permanent dedication of not less than 340,000 acre-feet of water in the Trinity River is essential in the rebuilding of Trinity and Klamath salmon populations. We point out, however, that the listing of any Trinity River salmon stocks under the Endangered Species Act may require that major amounts of flow be directed at protecting that particular race or species with potentially no benefit to non-listed salmon. It is our understanding that 340,000 acre-feet for the Trinity River is a minimum value that may be increased pending the completion of the Trinity River instream flow study by the Service. This interim 340,000 acre-feet for flow should not be construed to be the appropriate long-term allocation for salmon.

Question #5 - Emphasis on Natural Stocks

The Council concurs that the primary emphasis in restoring Central Valley salmon populations should be the naturally spawning component. Hatchery contribution in the Sacramento Valley appears to be at the maximum desired level, but additional artificial propagation facilities may be desirable for the San Joaquin basin. The Council understands that the State of California is considering the construction and operation of a small-scale salmon and steelhead hatchery on the Tuolumne River.

Question #6 - Accomplishment of CVPIA Goals

Based on experience in other Pacific Coast states, the Council believes that the most effective method to implement a broad-based restoration program is through State-Federal-nongovernmental partnerships. The Service should be particularly effective in Central Valley Project regulated streams such as the Sacramento, American, and Stanislaus rivers, while the State of California and nongovernmental sponsors can be most effective in implementing restoration measures in the non-Central Valley Project streams such as the Yuba, Feather, Tuolumne, and Merced rivers, and the smaller tributaries.

The California Department of Fish and Game recently issued two relevant reports: *Restoring Central Valley Streams: A Plan For Action* (1993) and *Restoring Central Valley Streams: A Plan for Action, Status of Implementation* (1995). The former report identified nearly 200 actions necessary to protect and restore habitat, and the latter report presented information that substantial progress has been made in initiating successful implementation. In its plan for action, however, the State pointed out that the CVPIA would be a crucial element in successful implementation of their plan.

The Council is aware that the State of California has not identified sources of funds for matches to many of the elements of the CVPIA which require a State contribution and may not have the financial resources necessary to implement the doubling goal of the CVPIA.

Question #7 - Current Legislation to Change the CVPIA

The Council is confident that timely implementation of key provisions of the CVPIA will provide substantial benefits to Central Valley salmon populations. We are aware that few elements of the CVPIA have been implemented to date. For example, the Anadromous Fish Restoration Program (Doubling Program) has been under development but is not yet complete, and only a few restoration actions proposed by the California Department of Fish and Game are being implemented. In addition, the Unscreened Diversions Program of the CVPIA remains under development. We understand that relatively few unscreened diversion problems have been abated by that program, but that there are several hundred unscreened diversions along the Sacramento River and nearly 2,000 unscreened diversions in the Sacramento-San Joaquin Delta that merit attention.

The Council is of the opinion that the CVPIA may require a maturation period of several years before an evaluation regarding its strengths and weaknesses can be fully developed. Suggestions to modify the present CVPIA at this early stage may be premature. We are concerned that changes to the CVPIA may lessen its potential to protect and restore habitats of salmon and reduce its contribution toward doubling the adult salmon population.

Summary

In summary, the Council believes that California has been given a tremendous opportunity through the CVPIA, Delta Accord, and other administrative actions within the Central Valley to greatly improve conditions for chinook salmon. We encourage timely and early implementation of many of the provisions of the CVPIA that will directly benefit salmon.

We are aware that water users, conservation groups, and fishery groups have initiated productive dialogues regarding the proposed Central Valley Project Reform Act of 1995. These meetings have resulted in the identification of areas of concern that can be rectified though administrative remedies. In fact, the Council believes that most areas of concern or dispute within the CVPIA can be successfully resolved through administrative action by the Secretary of the Interior and by the Bureau and Service. In particular, we believe the Department of the Interior has recognized the need to be flexible and to work with its stakeholders to maintain the consensus reached in California last December. The Department of the Interior is fully capable of eliminating the concerns expressed by agricultural water users in its administrative process, and thus eliminate the need for CVPIA reform legislation.

Sincerely,

Frank R. Warrens
Chairman

JCC:sjk
c: Council Members
The Honorable Bruce Babbitt, Secretary of the Interior
The Honorable Ron Brown, Secretary of Commerce

PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

CHAIRMAN
Frank R. Warrens

EXECUTIVE DIRECTOR
Lawrence D. Six

September 20, 1995

Dear Interested Person:

A common problem reducing the productivity of salmon stocks throughout the Council management area is the loss of significant numbers of juvenile fish at thousands of water intake and diversion sights. Fry, fingerling and smolting salmon are easily attracted into intake pipes or diversion canals as water is removed from streams for agricultural, industrial and domestic purposes. Once entrained, the fish are lost from any further contribution to future harvests or reproduction.

Not only are some pump intakes and water diversions in salmon and steelhead producing streams still unscreened, but many others are improperly screened or have screens and bypass systems which may be inadequately maintained. All these situations can result in the wasting of thousands of juvenile salmonids and exacerbate the need to consider stocks for listing under the Endangered Species Act.

While state and federal fishery agencies have developed fish screening criteria to adequately protect juvenile salmonids, there is often resistance by water diverters to implement the approved criteria and opt for less expensive, inadequate protection, including unproven experimental procedures which may rely on such things as light, sound or electricity to guide juveniles out of diversions.

On August 15, 1995, following action initiated by the Council's Southern Habitat Panel, the Habitat Committee and Council adopted the attached resolution to underscore the need for adequate, effective screening at all water diversions.

Sincerely,

Frank R. Warrens
Chairman

JCC:sjk
Attachments

RESOLUTION ENDORSING
ADHERENCE TO STATE AND FEDERAL FISH SCREENING CRITERIA

Whereas, fish entrainment into water diversions has been recognized as the cause of substantial losses of juvenile salmonids throughout the states of Washington, Oregon, California, and Idaho; and

Whereas, such losses may be especially detrimental to the productivity of many important natural stocks, including some listed or proposed for listing under the Endangered Species Act; and

Whereas, the loss of juvenile salmonids to diversions contributes to the overall diminishment of the ocean salmon harvest which is especially critical to many coastal communities and the fishing industry as a whole; and

Whereas, after extensive investigations and experience from implementation of screening in habitat areas utilized by naturally produced salmonids, fish screen criteria have been established or utilized by the National Marine Fisheries Service (Northwest and Southwest Regions) and the departments of fisheries and wildlife for Washington, Oregon, California, and Idaho to successfully protect juvenile fish; and

Whereas, the screening criteria of the fishery management agencies is essentially similar with some variation which takes into account regional differences;

Now, therefore, the Pacific Fishery Management Council endorses the salmonid fish screening criteria developed by the fishery management agencies for use in all fish screening projects (see attached screening criteria). Further, the Council emphasizes the need to implement these criteria now in lieu of unproven experimental alternatives which only result in further resource losses.

PFMC
08/15/95

PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

CHAIRMAN
Robert C. Fletcher

EXECUTIVE DIRECTOR
Lawrence D. Six

April 22, 1996

The Honorable Bruce Babbitt
Secretary of the Department of Interior
1849 C Street NW
Washington, DC 20240

Dear Mr. Secretary:

The Pacific Fishery Management Council (Council) has just completed its process of establishing management recommendations for the 1996 ocean salmon fisheries off the coasts of Washington, Oregon and California. Over the past several years, this process has become ever more complex and difficult as we factor in measures to protect many naturally produced salmon stocks which have been greatly diminished, primarily as a result of negative impacts on their vital freshwater spawning, rearing and migration habitats.

Much of the habitat degradation affecting salmon production has resulted from short-sighted and narrowly based development activities of man which have failed to consider the broader and longer-term impacts such development may have on the quality of our environment and its inherent natural productivity. Several of the salmon stocks affected by such action are now listed under the Endangered Species Act and more are likely to follow.

Given this declining situation for many natural stocks, the Council believes it is very timely to seize the opportunity for full restoration of the natural anadromous fish stocks of the Elwha River, Washington. The draft environmental impact statement of the National Park Service regarding Elwha River restoration clearly indicated the potential gains in the production of natural anadromous stocks which could occur with removal of the Elwha and Glines Canyon Dams. In view of the important need for meaningful recovery of natural salmon and steelhead stocks, the Council has passed a resolution (attached) encouraging immediate action toward this worthy goal for the Elwha River.

Sincerely,

Robert C. Fletcher
Chair

JCC:sjk
Attachment
c: Honorable Mickey Kantor, Acting Secretary of Commerce
Washington State Congressional Delegation
Ms. Carol Browner, Environmental Protection Agency
Kathleen McGinty, White House Staff
Representative Lynn Kesler
Representative Jim Buck
Senator Jim Hargrove
Mr. Bob Turner, Washington Department of Fish and Wildlife
Habitat Committee

RESOLUTION FOR THE RESTORATION OF THE ELWHA RIVER, WASHINGTON

Whereas, the Pacific Fishery Management Council (Council) was created under the Magnuson Fishery Conservation and Management Act of 1976 with a primary purpose of addressing issues affecting fisheries conducted within federal waters off Washington, Oregon and California; and,

Whereas, this responsibility includes emphasis on fishery habitat protection, restoration and enhancement; and,

Whereas, the National Park Service and other agencies of the Department of the Interior (DOI), with the cooperation of the Lower Elwha Klallam Tribe, other federal agencies and the State of Washington, have conducted extensive environmental, cultural and economic studies to evaluate the potential for full restoration of the Elwha River through the removal of the Elwha and Glines Canyon dams; and,

Whereas, the Council has reviewed these studies and environmental documents and concurs with their conclusion that federal acquisition and removal of the dams is the only cost-effective and beneficial way to fully restore the ecosystem and fisheries of the Elwha River; and,

Whereas, the Council has already provided the DOI its supportive comments on Elwha River restoration in a December 15, 1994 comment letter on the Elwha River Ecosystem Restoration Environmental Impact Statement; and,

Whereas, the completion of the environmental impact process is expected later in 1996 or early in 1997; and,

Whereas, the opportunity to restore as many as ten anadromous stocks, with only the one-time expenditure of funds required for acquisition and removal of the dams and a short-term fisheries restoration program, makes this one of the most cost-effective and best opportunities to dramatically increase wild salmon production in the Pacific Northwest; and,

Whereas, over 80 percent of the Elwha ecosystem is largely pristine and protected in Olympic National Park;

Now therefore, be it resolved that the Council strongly endorses the acquisition and removal of the Elwha and Glines Canyon dams by the federal government at the earliest opportunity.

PFMC
03/14/96

United States Department of the Interior

NATIONAL PARK SERVICE
Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98362-6798

IN REPLY REFER TO:

L7425(OLYM-S)

May 24, 1996

Robert C. Fletcher, Chair
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Dear Mr. Fletcher:

Thank you for your April 22, 1996, letter to Department of the Interior Secretary Mr. Bruce Babbitt in which you expressed the Pacific Fishery Management Council's support for Federal acquisition and removal of the Elwha and Glines Canyon dams on the Elwha River, Washington. Your letter has been forwarded to this office for reply.

Interior released the final "programmatic" environmental impact statement (EIS) in June 1995. The preferred alternative is the removal of both dams and the actions necessary to fully restore the Elwha River ecosystem and native anadromous fisheries, consistent with the Elwha River Ecosystem and Fisheries Restoration Act of 1992 (P.L. 102-495). The draft "implementation" EIS has been released, and the public comment period runs through June 26, 1996; the preferred alternative is to remove both dams and allow the river to naturally erode accumulated sediments downstream.

I appreciate the support of the Council for this important endeavor. As the Council's resolution notes, the Elwha River offers "one of the most cost-effective and best opportunities to dramatically increase wild salmon in the Pacific Northwest."

Please contact me at the letterhead address or at (360) 452-0311 if I can be of any further assistance.

Sincerely,

David K. Morris
Superintendent

PACIF FISHERY MANAGEMENT C UNCIL
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201
Telephone: (503) 326-6352

CHAIRMAN
Robert C. Fletcher

EXECUTIVE DIRECTOR
Lawrence D. Six

May 7, 1996

Mr. Roger G. Patterson, Regional Director
Bureau of Reclamation
Mid-Pacific Region
Federal Office Building
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Patterson:

At its April, 1996 meeting, the Pacific Fishery Management Council (Council) adopted ocean salmon fishery management measures which are intended to increase the number of endangered Sacramento River winter chinook spawners by about 35 percent over that level which could have been expected to occur under the regulations of recent years. The projected increase will come at the cost of a significant reduction in ocean harvest of chinook salmon off California.

The Sacramento River Winter-run Recovery Team has clearly identified freshwater and estuary habitat problems as the main causes for the collapse of the winter chinook stock. In this situation, the increased ocean harvest restrictions may provide a temporary increase in winter-run spawners to avoid a critically low spawning population this comming year. However, the sacrifice of the ocean fishers will be in vain if complementary action is not taken to assure these endangered fish meet improved freshwater spawning, rearing and migration conditions for a sustained recovery. In recognition of the importance of resolving all of the management issues surrounding the recovery of the winter-run, the Council developed the attached resolution, calling for action by your agency to help assure a fruitful recovery effort.

The Council, ocean fishers and coastal communities which depend on abundant salmon stocks request your cooperation in this important task to recover the winter-run chinook salmon.

Sincerely,

Lawrence D. Six
Executive Director

JCC:sjk
Attachment
c. Habitat Committee

Pacific Fishery Management Council

RESOLUTION ON WINTER-RUN CHINOOK SALMON HABITAT

Whereas, the National Marine Fisheries Service has called for reducing the 1996 recreational and commercial salmon fishing harvest in order to protect Sacramento River winter-run chinook salmon from extinction; and

Whereas, commercial and recreational fishing has not been the cause of the decline of winter-run salmon; and

Whereas, the suggested fisheries constraints to protect winter-run will cost the recreational and commercial salmon fisheries millions of dollars in lost revenue; and

Whereas, an increase in freshwater outflows from the Sacramento-San Joaquin Delta into San Francisco Bay is needed to maintain estuarine habitat and reverse the precipitous decline of water quality and fish and wildlife species including the delta smelt (listed as threatened) and winter-run chinook salmon (listed as endangered); and these outflows are now available as part of the three-year 1994 Bay/Delta Accord; and

Whereas, there have been losses of downstream migrating smolts to unscreened water diversions; and

Whereas, on-the-ground habitat restoration efforts to restore winter-run populations need to be intensified; and

Whereas, the U.S. Fish and Wildlife Service has halted the winter-run artificial propagation program at Coleman hatchery for one year to study problems of hybridization and smolt imprintation; and

Whereas, some of the habitat improvement measures already identified are yet to be implemented;

Now, therefore, be it resolved that consistent with its harvest management recommendations to protect winter-run chinook, the Pacific Fishery Management Council requests that:

1. The California State Water Resources Control Board provide sufficient outflows from the Sacramento-San Joaquin Delta to protect winter-run chinook and review the adequacy of the outflows required from the Sacramento-San Joaquin Delta in its 1995 Water Quality Plan during the tri-annual review of the plan to assure protection of winter-run; and

2. The U.S. Fish and Wildlife Service and the Bureau of Reclamation prioritize and expeditiously implement on-the-ground projects to restore winter-run habitat; and

3. The Federal Energy Regulatory Commission review the hydropower licenses for the projects on Battle Creek to determine if flow requirements should be modified to protect and restore fish and wildlife of the basin and downstream areas; and

4. The U.S. Fish and Wildlife Service and National Marine Fisheries Service explore whether winter-run could use Battle Creek as spawning grounds. This determination would need to resolve disease, fish passage, and water quality and temperature issues.

PFMC
Adopted 4/12/96

Cal/EPA

State Water Resources Control Board

Mailing Address:
P.O. Box 100
Sacramento, CA
95812-0100

901 P Street
Sacramento, CA
95814
(916) 657-0941
FAX (916) 657-0932

JUN 2 1 1996

Pete Wilson
Governor

Mr. Lawrence D. Six
Executive Director
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

Dear Mr. Six:

PROTECTION/RECOVERY OF WINTER-RUN CHINOOK SALMON

I am responding to your letter of May 7, 1996 to Chairman John Caffrey in which you request the cooperation of the State Water Resource Control Board (SWRCB) in winter-run chinook salmon recovery efforts. Your letter and attached resolution discuss the importance of providing adequate freshwater flows for spawning, rearing and migration conditions and request the SWRCB consider the needs of winter-run chinook salmon in its triennial review of the 1995 Water Quality Plan for the Sacramento/San Joaquin Delta Estuary (1995 Plan).

The 1995 Plan contains flow and water quality objectives for the protection of various fish species as well as narrative objectives for the protection of chinook salmon. The SWRCB sought information from various groups, including state and federal fishery agencies and private environmental organizations, in developing the objectives in the 1995 Plan. Many of these groups are involved in ongoing studies to determine the needs of the fish. The SWRCB supports these efforts and will consider all relevant information regarding objectives necessary to protect the fish and wildlife as well as the other beneficial uses of the Delta when it conducts its triennial review of the 1995 Plan in 1998.

Thank you for your comments. Working together with other interested agencies, I believe we can jointly achieve protection of this and other fish species. If you have any questions regarding this matter, I may be contacted at (916) 657-0941 or you may contact Victoria Whitney, Chief of the Bay/Delta Unit, at (916) 653-2516.

Sincerely,

Walt Pettit
Executive Director

cc: State Water Board Members

PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

CHAIRMAN
Robert C. Fletcher

EXECUTIVE DIRECTOR
Lawrence D. Six

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: Elwha 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 Elwha 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 Elwha and Glines Canyon Projects by the federal government at the earliest opportunity. Given these facts, we offer the following comments on the Elwha 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 Elwha River ecosystem. The alterative 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 Elwha 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

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,

Robert C. Fletcher
Chairman

JCC:hmm

PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Telephone: (503) 326-6352

CHAIRMAN
Robert C. Fletcher

EXECUTIVE DIRECTOR
Lawrence D. Six

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.

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

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CHAIRMAN
Robert C. Fletcher

EXECUTIVE DIRECTOR
Lawrence D. Six

October 30, 1996

Governor John A. Kitzhaber
Salmon Plan Review
Capitol Building
Salem, Oregon 97310

Dear Governor Kitzhaber:

The Pacific Fishery Management Council (Council) would like to provide some brief comments on the draft *Oregon Coastal Salmon Restoration Initiative (CSRI)*.

We first would like to recognize and endorse the considerable effort that you and your administration have put forth in committing to rebuilding Oregon's coastal salmon stocks. The CSRI draft plan reflects your strong commitment to healthy sustainable fish populations upon which fishing communities depend.

Our comments on the draft CSRI are as follows:

1. The CSRI needs additional impetus to assure habitat protection and restoration.

   We agree that voluntary approaches to solving the salmon crisis are preferable to additional regulatory burdens on Oregon's citizens and natural resource industries. However, in the past several years, the Council has imposed severe restrictions on ocean coho salmon fisheries along the entire West Coast. These closures have been at great cost to salmon dependent communities. The purpose of the closures has been to return more spawners to the streams. If adults return to natal streams that are of poor quality for spawning and rearing, then the inordinate sacrifice of our fishing community is diminished.

   The Council believes that fisheries restrictions which result in economic hardship on the recreational and commercial fishing industries and dependent coastal communities, must be accompanied by concomitant measures which address the serious habitat problems faced by anadromous fishes. In addition, the burdens (and benefits) of natural resource management must be shared by all the citizenry.

   Therefore, the CSRI should emphasize enforcement and monitoring of the existing habitat regulations on state and private lands and recommend stronger rules where needed. Specifically, forest practice regulations protecting small fish bearing streams on state and private lands may be inadequate to ensure full protection of anadromous resources. Also, management of Oregon's range and crop lands needs to reflect a commitment to reducing negative impacts on water quality.

2. Long-term commitment, funding and monitoring is essential.

   Recovery of anadromous salmon stocks will require years if not decades. We hope that the final plan will be constructed so that it is shielded from the inevitable fiscal and political changes in years to come. We anticipate that a challenge to the CSRI's success will be the securing of sufficient long-term, stable funding. This funding will be especially vital in monitoring the success of the program. Without proper monitoring, the long term vision of your program may be lost on future administrations, state legislators, industry and taxpayers, who will undoubtedly ask for fiscal accountability.

3. Emphasis is needed on protecting habitat outside the core areas.

   We agree that the CSRI's identification and protection of "core areas," is an important building block in our salmon recovery efforts. However, in some instances, core area management may be compromised by events that occur miles away from those areas. For example, lower gradient sections of coastal streams provide important coho winter habitat. If the benefits of productive (healthy or core area) upstream spawning and summer habitats are to be realized, then properly functioning winter habitat must be available to realize gains further upstream.

In closing, we are excited about the prospects presented by the CSRI. We are grateful for your leadership and look forward to participating in this process.

Sincerely,

Robert C. Fletcher
Chairman

SP:hmm
c. Rudy Rosen
Habitat Committee
Will Stelle
Hilda Diaz-Soltero