

PACIFIC FISHERY MANAGEMENT COUNCIL

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Interior Columbia Basin Ecosystem Management
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Interior Columbia Basin Ecosystem Management Project
Environmental Impact Statement Team
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To Whom It May Concern:

Below are the comments of the Pacific Fishery Management Council (Council) on the *Upper Columbia River Basin Draft Environmental Impact Statement* and the *Eastside Draft Environmental Impact Statement*.

The 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, 1990, and 1996 (now referred to as the Magnuson-Stevens Fishery Conservation and Management Act [Magnuson-Stevens Act]) added emphasis to the Council's role in fishery habitat protection, restoration, and enhancement.

The 1996 amendments to the Magnuson-Stevens Act contain important language directing the National Marine Fisheries Service and regional fishery management councils to identify and describe habitat that is essential to the spawning, breeding, feeding, or growth-to-maturity of fish species managed by the Councils. The Magnuson-Stevens Act's amendments also mandate that threats to "Essential Fish Habitat" (EFH) be identified and that conservation and enhancement measures be described that minimize those adverse impacts. The Magnuson-Stevens Act also requires that the regional fishery management councils comment on federal or state agency activities that are likely to substantially affect the EFH of an anadromous fishery.

In our opinion, the Upper Columbia River Basin and the Eastside Draft Environmental Impact Statements are significant in nature and deserve comment from the Council.

The management of the Interior Columbia Basin's natural resources is of great importance to the West Coast tribal and non-tribal salmon fishing industries. As defined by the Draft Environmental Impact Statement (DEISs), "Key" Council-managed salmonid species affected include sockeye and chinook salmon. Though not identified as key species, coho salmon also fall within the boundaries of the DEISs. While steelhead are not managed by the Council, it is still a species of concern to recreational and commercial fishers.

It is well documented that the range and forest land conditions in lands covered by the DEISs have changed dramatically from the time of pre-European settlement. These changes have negatively affected anadromous salmonid stocks. According to the Eastside DEIS (Chapter 2, page 153):

More than 95 percent of the healthy native stocks of anadromous fish are believed to be threatened by some degree of habitat degradation. Fish habitat quality in most watersheds has declined...pool frequency has decreased and fine sediments has increased in many project-area watersheds. In addition to hydroelectric development, most alterations of steelhead habitat can be attributed to human land-distributed activities as a result of mining, timber harvest, agriculture, industrial development, and urbanization.

With the loss and degradation of freshwater habitat throughout Columbia Basin watersheds, it is not surprising that salmon stocks throughout much of the Pacific northwest are in a crisis situation. Fisheries coastwide have been affected by the listing of numerous stocks of coho, chinook, and sockeye salmon on the Endangered Species Act. Snake River chinook and sockeye salmon are listed under the Endangered Species Act, and Columbia Basin coho are still under consideration for possible listing. Necessary fishery management considerations to protect "threatened" Snake River fall chinook negatively impact commercial fisheries in southeast Alaska and significantly constrained harvest of other abundant chinook stocks in ocean fisheries from California to Washington in 1997. Such reductions in fisheries will continue and potentially increase unless freshwater habitat is restored and protected to assure recovery of listed salmon stocks and prevent the need for future additional listings.

General Comments on the DEISs

We would first like to commend the staff of the Interior Columbia Basin Ecosystem Management Project for the high degree of professionalism that went into preparing the voluminous information contained in the DEISs.

Our comments are as follows:

1. Riparian Management:

- a. The Preferred Alternative contains many management elements that will provide good minimum safe-guards for aquatic ecosystems. *We commend the Preferred Alternative for the use of the slope adjustment factor in determining the width of the Riparian Conservation Areas (RCAs).*
- b. We are concerned about the effect grazing and mining activities in the RCAs will have on anadromous salmonids. The Preferred Alternative does not discontinue grazing in areas where proper functioning conditions (PFC) or riparian management objectives "have not been obtained." Similarly, the Preferred Alternative allows mining operations in RCAs.

We believe that the aquatic strategies as presented in Alternative 7 should be incorporated in the Preferred Alternative. Among other things, Alternative 7 suspends grazing in RCAs when riparian management objectives (RMOs) are not accomplished if grazing is shown to be a contributing factor to the diminishment of RMOs, and requires new mining activities to be located outside of the RCAs, and suspends mining activity in RCAs under certain circumstances.

- c. *We suggest combining the Preferred Alternatives' two riparian zones into one zone to enhance riparian delineation and protection. Timber harvest should not be allowed in the RCA, unless it would benefit aquatic health as determined by watershed analysis (e.g., watershed restoration).*
- d. *On Page 202 Appendix G, Alternatives 4 and 6 employ a riparian delineation process based on "site potential tree heights, or extent of floodprone area, or extent of riparian vegetation width, which ever best provides greatest protection to aquatic...resources." However, on page 203 under "Minimum Widths for Perennial Streams," the delineation process says that Zone 1 of the RCA should be "one site potential tree, or extent of floodprone area, or extent of wet vegetation which ever best maintains, protects, and restores the aquatic environment."*

We propose that the riparian delineation language use consistent language when delineating RCAs. We prefer "site potential tree heights, or extent of floodprone area, or extent of riparian vegetation width, which ever best provides greatest protection to aquatic...resources." This will ensure that the RCA receives the most favorable treatment.

2. Core Area Protection

Given the severely depressed nature of numerous stocks of Interior Columbia basin salmon and steelhead stocks, the management concepts of core reserve areas and key salmonid strongholds becomes particularly important. It is critical that those few watersheds (which are found within the DEIS's category one sub-basins) containing strong populations of naturally reproducing fish be given exceptional treatment.

We support comments made on a pre-release of the DEIS by Oregon Governor, John Kitzhaber, in a February 19, 1997 letter:

I am not suggesting that you put together an eighth alternative for the Draft EIS. However, I suggest that you consider putting together an alternative between the draft EIS and the Record of Decision that phases activity using the themes of Alternatives 4, 6, and a theme that minimizes activity in areas that are highly controversial [roadless areas, habitat supporting salmonid strongholds, and old growth stands]. This alternative would rely on the Scientific Assessment as a guide for targeting and determining levels of activity along with some mechanism to provide the necessary feedback loop. I believe targeted monitoring is critical and requires a meaningful long-term budget commitment.

Dr. Bern Shanks, Director of the Washington Department of Fish and Wildlife (WDFW), also advocated for greater protections of sensitive areas in a February 6, 1997 letter regarding the pre-release DEIS:

Alternative 7 is based on the ecological reserve design concept and implicitly

recognizes that there are important areas of biodiversity conservation within the Interior Columbia Basin. To Alternative 4, WDFW would seek to add a biodiversity conservation area theme from Alternative 7. More specifically, WDFW would like to add the identification and active management of "Biodiversity Conservation Areas"...The areas would not be "reserves" as currently stated in Alternative 7, as WDFW does not believe that an appropriate strategy would put these areas off limits to all management activities. We recognize that there are low-risk, scientifically-sound management activities (e.g., noxious weed control, thinning, light underburning, fire breaks, recreation) that can be undertaken within these areas and not diminish or compromise their biodiversity element.

The Council suggests that the Preferred Alternative incorporate a bolstered core area reserve approach, comparable to that presented in Alternative 7, with particular emphasis on the protection and enhancement of anadromous salmonid habitat. We believe management prescriptions that benefit aquatic resources such as watershed restoration need to be utilized in these reserves.

3. State Listed Species

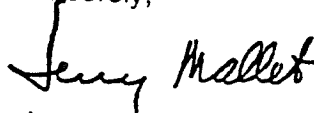
We request that all of the DEIS's Preferred Alternative incorporate state-listed threatened and endangered species.

Conclusion

In conclusion, restoration of the Columbia Basin's anadromous salmonid stocks will be an enormous challenge. However, each piece of the recovery puzzle, whether it be on state, federal, private, or tribal land must be put in place if we, as a region, are serious about restoring salmon to harvestable surpluses. We believe the fishing industry has shouldered its part of the recovery burden through the numerous closures and shortened seasons that have typified Council ocean fishery management in the last five years. We remind you that the critical decisions you make on managing the federal lands of the Interior Columbia Basin will, in part, determine the fate of these fish and the survival of the tribal and non-tribal fishing industries. We, therefore, encourage you to adopt a risk-averse management regime that provides strong aquatic protection standards for salmonids.

We also recognize that funding for the Interior Columbia Basin Ecosystem Management Project is critical to its success. Thus, we strongly support full funding for this effort. We look forward to working with you in this important process. Please feel free to contact the staff of the Council at (503) 326-6352.

Sincerely,



Jerry Mallet
Chair

SHP:rdh

c: Mr. Will Stelle, Regional Administrator,
National Marine Fisheries Service, NW Region