

# PACIFIC FISHERY MANAGEMENT COUNCIL

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July 7, 2000

USDA Forest Service--CAET  
Attention: Roadless Areas Proposed Rule  
P.O. Box 221090  
Salt Lake City, UT 84122

Dear Comment Officer:

The purpose of this letter is to provide comments on the Roadless Area Conservation Proposed Rule and Draft Environmental Impact Statement (Proposed Rule). The actions that will result from the Proposed Rule will affect the essential habitats of the coho, chinook, and Puget Sound pink salmon that are under our management; therefore, we urge you to accept these comments.

The Pacific Fishery Management Council (Council) was created by the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) in 1976 with the primary role of managing fisheries conducted within federal waters off Washington, Oregon, and California. Subsequent congressional amendments to the Magnuson-Stevens Act in 1986, 1990, and 1996 added emphasis to the Council's role in fish habitat protection. The 1996 amendments directed the Council to identify and describe "essential fish habitat," (EFH) the habitat essential to the spawning, breeding, feeding or growth-to-maturity of fish species it manages. It also directed the Council to provide comments and recommendations on federal actions in order to minimize the impacts on these essential habitats.

The Council commends the Administration and the U.S. Forest Service for taking this important step towards ensuring the protection of the region's remaining roadless areas. Such a strategy is an essential component to our regional salmon recovery plan.

Within the last 150 years, land management practices throughout the Pacific Northwest have drastically changed the urban, agricultural, and forested landscape. Thousands of stream miles in the region do not meet Clean Water Act water quality standards. These changes as well as other factors have led to the decline and extirpation of numerous salmon populations throughout the region. National Marine Fisheries Service (NMFS) has now listed under the federal Endangered Species Act (ESA) over 20 evolutionarily significant units which encompass almost all of the anadromous spawning and rearing habitat from Central California through Oregon, Washington, and Idaho.

Within the sub-basins that support salmon, the best habitat conditions are found in the few remaining relatively undeveloped areas. As the region attempts to deal with the many factors that have led to the declines in these salmon populations, it is clear we must implement strategies that, as a first necessary step, protect the remaining areas of habitat that are

Comment Officer  
July 7, 2000  
Page 2

properly functioning at the watershed scale. Additionally, we need to implement restoration plans on habitat that has been degraded, especially in areas that help link up and expand the high quality habitat areas. In this context, it becomes critical the remaining roadless areas are protected from road construction activities.

NMFS has acknowledged that road construction activities and the impacts of the existing road network are major causes of salmon habitat decline. Federal watershed assessments throughout the region have also indicated that road construction causes unavoidable adverse effects on streams through increased sedimentation. This leads to a decrease in egg-to-smolt survival and in the quality of salmon rearing habitat. With so many ESA listed stocks and so few stronghold populations throughout the region any additional incremental damage through additional road building activities will accelerate population declines.

We recognize the importance of roads on public lands for multiple use purposes; however, we believe the existing road networks adequately provide for those uses.

The Council believes the current proposal to protect roadless areas of 5,000 acres or more will lead to the eventual loss of many significant habitat areas; therefore, we make the following recommendations concerning the roadless area proposed rule:

- Provide full protection of all roadless areas greater than 1,000 acres (whether currently inventoried or not). Full protection includes prohibiting all land disturbing activities that degrade the ecological function of the roadless areas, such as logging, grazing, mining, and off-road vehicle use.
- Provide full protection of all roadless areas less than 1,000 acres that may be ecologically significant (for example for recruitment of large wood, provision of cold water refugia). These smaller roadless areas should not be subjected to disturbance until their ecological significance has been evaluated via peer-reviewed analysis.
- Develop an aggressive program to reduce the adverse effects of existing roads on anadromous fish habitat, especially in migration corridor and headwater areas to improve the connectivity between existing roadless high quality habitat areas.

For your information, under the Magnuson-Stevens Act, NMFS requires federal agencies to consult regarding actions that may affect EFH. In this context, they may have additional comments and recommended conservation measures.

In summary, the Council believes roadless area conservation will be an important step in securing the survival of our remaining salmon stocks and hastening their recovery. We commend your efforts and urge you to move forward in your rulemaking.

Sincerely,

  
Jim Lone  
Chair

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Mr. David Hayes, Deputy Director  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

Ms. Mary D. Nichols, Secretary  
California Resources Agency  
1416 Ninth St., Room 1311  
Sacramento, CA 95814

Dear Mr. Hayes and Ms. Nichols:

As a follow up to our letter of September 1999 regarding the CALFED *Draft Environmental Impact Statement* (DEIS), we have the following comments regarding your habitat and water management programs.

The Pacific Fishery Management Council (Council) manages fisheries off California, Oregon, and Washington that depend on the ecological health of the San Francisco Bay-Sacramento and San Joaquin Delta System (Bay-Delta System). The Council, through the 1976 Magnuson-Stevens Fishery Conservation and Management Act and its subsequent amendments, has been charged by Congress to provide comments on federal actions to minimize impacts to the essential habitat of the fish it manages. The Bay-Delta System, its biological components, and the ecological processes supported by this system are part of the essential habitat for salmon (winter chinook, spring chinook, fall chinook, late fall chinook, and coho), for coastal pelagic species (Pacific sardine and northern anchovy), as well as for numerous groundfish species (e.g. English sole, starry flounder, brown rockfish, lingcod, leopard shark). The life cycles of these fish depend on the productivity and habitats the estuarine and wetland environments of the Bay Delta System provide.

We write to urge you and other members of the CALFED policy group to give primary weight in all of your programs to rehabilitating the biodiversity and ecological processes of the Bay-Delta System. Such rehabilitation is essential to the fish stocks we manage and to the current and future economic well being of fishermen and coastal communities in the region.

We are grateful for and continue to support CALFED's efforts to restore habitat and manage water operations to benefit our sensitive salmon and steelhead populations. However, there are many risks and uncertainties inherent in various management options. Therefore, as you move forward in your plans, we urge you and your science groups to acknowledge these

Mr. David Hayes and Ms. Mary Nichols  
July 7, 2000  
Page 2

uncertainties and in response take a 'risk-averse' approach. Restoring functioning ecosystems within a highly altered background and restoring the fishes that depend on such functioning systems will mean maximizing those potential benefits over other considerations when uncertainty is high.

Additionally, the Council urges the Policy group to incorporate the following as requirements in your programs:

- \* Preference for restoration of natural ecological processes (e.g., through dike removal, water transfers/water markets) over engineered solutions such as increasing dam height and storage.
- \* Quantitative performance measures established for all ecological rehabilitation efforts.
- \* Quantitative performance measures linked to fish numbers and species diversity.
- \* A monitoring plan adequate to establish baseline and evaluate success based on performance measures.
- \* A process by which changes can be made (adaptive management) based on such monitoring results.
- \* Identification of long-term funding sources for the plan and its monitoring component.
- \* Long-term commitment of funding for an on-going inter-agency, science-based governance body to ensure plan execution and success.

We intend to monitor the development of CALFED's Assurances package and Record of Decision, and stand ready to assist in any way we can.

Respectfully,



Jim Lone  
Chair

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