

PACIFIC FISHERY MANAGEMENT COUNCIL

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December 15, 2005

Mr. John W. Keyes III, Commissioner
Bureau of Reclamation
1849 C Street NW
Washington, DC 20240-0001

Dear Mr. Keyes:

The Pacific Fishery Management Council (Council) appreciates the Bureau of Reclamation's (BOR) response dated July 7, 2005 (Ref. W-6332, PRJ-13.00), regarding management of water flows on the Klamath River. However, your response did not adequately address the issues posed by the Council. Fishing communities feel a strong sense of urgency regarding the resolution of water quality and quantity issues within the Klamath River system. Resolution of these issues is critical to the immediate needs of in-river and ocean fisheries, and to the health of the Klamath ecosystem. Management of both the quality and quantity of water in the Klamath River and its tributaries is critical for all phases of freshwater salmon life history. Therefore, the Council recommends that the BOR:

- Reinitiate consultation with National Marine Fisheries Service (NMFS) as soon as possible regarding the effects of water project operations on chinook and coho salmon essential fish habitat (EFH), and that the analysis and flow recommendations include a credible biological basis, such as contained in the draft Hardy Phase II report referenced in our previous letter.
- Implement draft Hardy Phase II recommendations as an interim measure while consultations are ongoing.
- Revise water bank accounting to reflect actual savings of water in those areas critical for salmon survival.
- Support studies of juvenile survival and health and provide adequate funding for the Klamath monitoring programs.
- Develop credible long-term solutions to water management problems within the Klamath Basin.

The Council is concerned that the biological opinion (BO) discussed in your letter, which is used to guide flow releases from Iron Gate Dam, is not based on a biological analysis that addresses the needs of coho salmon. In addition, the impacts to the essential fish habitat (EFH) of coho and chinook salmon were not sufficiently analyzed.

We appreciate the Bureau of Reclamation's (BOR) action to provide water bank assets for additional water for river flow, but believe that the additional quantity of water provided may not be adequate to meet salmon recovery and productivity goals in the basin. Also, because of water bank accounting methods, it is difficult to determine whether water bank allocations result in meaningful changes to water flow. Actions cited in your letter, such as groundwater pumping,

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may be beneficial in the short term, but it is unclear if these can be sustained over the long term to provide meaningful benefit to the salmon populations in the basin.

A continuing disease problem (*C. Shasta*) in the main-stem Klamath River significantly affects juvenile salmon survival and productivity. The emergence of this disease issue supports the need for a renewed consultation with NMFS. Studies should be established and adequately funded to determine the rate of in-river juvenile mortality associated with these pathogens and to identify appropriate mitigating actions.

The Council remains committed to working with you to resolve these issues as we execute our responsibilities under the Magnuson-Stevens Fishery Conservation and Management Act. We invite the BOR to meet directly with us to affect a timely resolution of these issues as the health of salmon stocks remain in question and the lives of the fishing communities dependent on these stocks are severely impacted.

Sincerely,



Donald K. Hansen
Chairman

JDG:ckc

Cc: Honorable Barbara Boxer
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Honorable Gordon Smith
United States Senate
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