



Pacific Fishery Management Council

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Dan Wolford, Chairman | Donald O. McIsaac, Executive Director

May 15, 2012

The Honorable Ken Salazar, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

RE: Action Requested to Prevent Klamath River Fish Kill

Dear Secretary Salazar:

The Pacific Fishery Management Council (Council) is concerned that potential low flows in the Klamath River will substantially affect salmon essential fish habitat (EFH) and potentially create conditions leading to a fish kill in the Klamath River during the fall Chinook migration in 2012, such as occurred in 2002. The purpose of this letter is to recommend advance planning for stored water releases this fall so as to prevent such an occurrence.

As you know, the Council is one of eight regional fishery management councils established by the Magnuson-Stevens Fishery Conservation and Management Act of 1976 (MSA), and recommends management actions for Federal fisheries off Washington, Oregon and California. The MSA includes provisions to identify, conserve, and enhance EFH for species regulated under a Council fisheries management plan. Each Council is authorized under MSA to comment on any Federal or state activity that may affect the habitat, including EFH, of a fishery resource under its authority. Furthermore, for activities that the Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, the Council is obligated to provide comments and recommendations (MSA §305(b)(3)).

Forecasted Flows

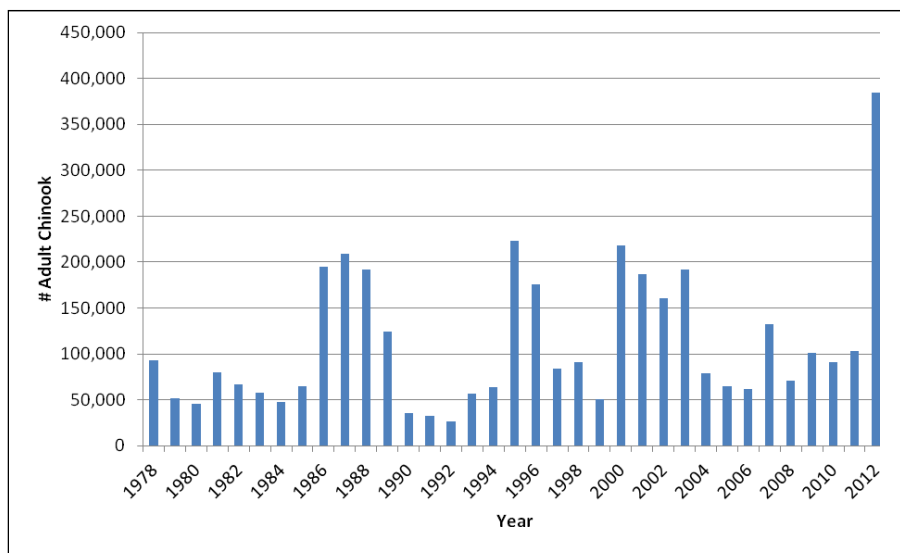
Precipitation during the past several weeks has substantially improved hydrologic conditions for the Klamath Basin; forecasted summer flows have gone from extremely dry in early March to nearly normal in mid-April. However, given that the projection for the fall Chinook run is much larger than any time since comprehensive records were first taken in 1978, and there are water management decisions to be made between this point and September, we remain concerned that sufficient flow be provided in the lower river to minimize conditions similar to those that led to the September 2002 fish kill, when more than 33,000 adult salmon died in the Lower Klamath River.

We recommend you pursue all necessary measures to ensure an adequate amount of additional water will be available for release from the Trinity and/or Upper Klamath basins during the peak migration and holding timeframe for the fall Chinook return. Such flow augmentation should be designed to maintain the quality of salmon EFH and minimize the likelihood of another fish kill, taking into consideration the river flow patterns and salmon abundance that resulted in the 2002 fish kill. Therefore, we recommend that the Department of Interior work with the Klamath Basin’s biologists and scientists, such as the Trinity River Restoration Program’s Flow Group, to determine the best manner for using this water to minimize the potential for another fish kill.

Forecasted Run Size

The 2012 fall Chinook escapement is projected to be much larger than any other year since 1978. Ocean fishery modeling, including projections of the number of fish returning to the Klamath Basin, will continue through April, but the Council’s Salmon Technical Team’s preliminary Klamath Ocean Harvest Model estimate indicates that over 380,000 adult fish will return to the Klamath River, nearly 2.4 times the 2002 adult run size associated with the 2002 fish kill. Several analyses, including one produced by the U.S. Fish and Wildlife Service¹, concluded that low river flow and high densities of fish contributed to the outbreak of two diseases (Ich and columnaris) that caused the 2002 fish kill.

The figure below contains the post-season estimated Klamath River adult fall Chinook run sizes for 1978 – 2011 and the projected abundance for 2012.



In closing, the Council recommends that the Department of the Interior initiate planning how to take all necessary steps in the coming months to ensure sufficient water is available to minimize the potential for another fish kill if conditions in the Klamath River are predicted to become, or become, dangerous to migrating Chinook salmon in the late summer and fall of 2012. We would appreciate hearing about such planning, and offer our assistance in any way possible.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. O. McIsaac", with a long horizontal flourish extending to the right.

D. O. McIsaac, Ph.D.
Executive Director

JDG:kam

C: Council Members
Mr. Samuel Rauch
Mr. Alan Reisenhoover
Mr. Will Stelle
Mr. Rod McInnis
Habitat Committee
Salmon Advisory Subpanel
Salmon Technical Team

¹ Guillen, G.J. 2003. Klamath River Fish Die-off: September 2002: Report on Causative Factors. AFWO 03-03. USFWS. Arcata, California