



Pacific Fishery Management Council

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Dorothy M. Lowman, Chair | Donald O. McIsaac, Executive Director

July 10, 2014

The Honorable Sally Jewell, 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 Jewell:

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 late summer of 2014, such as occurred in 2002. The purpose of this letter is to recommend the Department engage in advance planning for stored water releases this fall 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 the Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, the Council is specifically charged with providing comments and recommendations (MSA §305(b)(3)).

Forecasted Flows

Precipitation and resultant water supply in the Klamath Basin this year are most likely to continue a trajectory toward extreme drought. This is indicated by the fact that precipitation has been substantially lower than average since January 2013 and that flows at several gauging stations throughout the Basin today stand at levels at or below those seen during the severe drought of 1997-98. Precipitation between now and August is

forecasted to be insufficient to mitigate what is expected to be adverse habitat conditions. There are water management decisions to be made between this point and September, and we remain concerned that sufficient water supplies be saved now so that the Bureau will be in a position to prevent conditions that may appear in the lower river similar to those that led to the September 2002 fish kill, when more than 33,000 adult salmon died in the Lower Klamath River.¹

The hydrologic data for June 2014 provides evidence that flow levels in the lower Klamath River will likely fall below minimum thresholds developed collaboratively by the Trinity River Restoration Program (TRRP) and the Bureau of Reclamation's Klamath Basin Area Office under the guidance of the TRRP's Fall Flow Subgroup for protection of adult fall Chinook migrants.² Specifically, flows no lower than 2,500 cfs as measured at the U.S. Geological Survey (USGS) gauge "Klamath River near Klamath" are needed commencing in August and continuing at least through September 21. The Subgroup determined that this minimum floor would be recommended regardless of projected run size for Klamath fall Chinook salmon. Additional supplementation would be necessary, should disease outbreaks or unseasonably warm late-September water temperatures come to pass.

Requested Action

The Council requests that you examine allocations of water scheduled or expected in the current year, and pursue all necessary measures to ensure an adequate amount of supplemental water be available for release from the Trinity and/or Upper Klamath basins during the peak migration and holding timeframe for the fall Chinook salmon return. Such flow augmentation should be designed to maintain the quality of salmon EFH and minimize the likelihood of another fish kill and specifically avoiding the river flow patterns and adverse conditions that resulted in the 2002 fish kill. The Council also recognizes that actions taken this year may impact available water management options in the coming year, and that those impacts should be considered while deriving the optimal flow allocation for the key period in August and September. We recommend the Department of Interior work with Klamath Basin scientists, the TRRP, and co-managers to determine the best manner for shaping flows to minimize the potential for another fish kill.

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

² Hayden, T. 2012. Memorandum to the fall flows subgroup. Re: 2010 and 2011 Fall flow release criteria and evaluation process. Available at <http://odp.trrp.net/Data/Documents/Details.aspx?document=1608>

In closing, the Council requests planning efforts be initiated now to ensure protection of EFH. Further, this recurring issue leads us to recommend the Department of Interior finalize a permanent and comprehensive plan to address the needs of lower Klamath fish passage.

We would appreciate hearing about the results of your 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:csp

Cc: Council Members
Habitat Committee
Salmon Advisory Subpanel
Salmon Technical Team