



Pacific Fishery Management Council

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

May 12, 2015

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 (Pacific Council) is concerned that projected low flows in the Klamath River later this summer and fall 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, 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 Pacific 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 fishery 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 Pacific Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, the Pacific Council is obligated to provide comments and recommendations (MSA §305(b)(3)).

The Pacific Council thanks the Department of the Interior for their actions to protect against a fish kill in the Klamath River during the record high run of fall Chinook salmon that returned in 2012 and in subsequent years. We appreciate that these proactive conservation measures successfully prevented fish kills during dry years, and we ask that similar protection occur this fall.

The Pacific Council also acknowledges the "Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River" as a step towards providing for salmon flows as needs arise and in a consistent fashion. However, the document is in draft form, and therefore we ask that you consider our current comments on Klamath and Trinity River operations and plans. We request that you direct the Bureau of Reclamation (BOR) to make provisions to include the

Pacific Council's comments on the draft plan during the National Environmental Policy Act (NEPA) process—either by taking into account the Pacific Council's meeting schedule or by assuring the Pacific Council that our comments will be accepted should the NEPA comment period conflict with our schedule. As described below, we anticipate providing specific comments on this important plan at the appropriate time.

Forecasted Flows

Extreme drought conditions persist in California due to a lack of rain and snowfall over four straight years. Recent rain and snowfall are not expected to change the current drought forecast. This year's drought is on track to be one of the worst in the state's recorded history. The most recent snowpack survey shows that statewide, the snowpack's water content is just 5 percent of average for April 1, breaking the previous record of 25 percent in 1977 and 1991.

The Klamath basin is reported as of April 1 to have an average snowpack of 13 percent of normal to date and a total water year of 96 percent normal precipitation to date. Summer flow forecasts range between 32 percent to 46 percent of normal. The late summer flow in the Trinity is forecast to be 68 percent of normal, and the flow into Upper Klamath Lake from April 1 to September 30, per the April 1 Natural Resource Conservation Service forecast, is projected to be 39 percent of average.

Forecasted Run Size

The Pacific Council forecast for the Klamath river mouth during 2015 is 119,000 adult fall Chinook. This is below the threshold of 170,000 adults that is proposed in the "Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River" at which Reclamation would consider augmentation. However, it should be noted that our preseason forecast is a mid-point of statistically possible run sizes. For example, in 2014 there were 93,200 adult fall Chinook projected to return to the river, yet an estimated 160,400 actually returned to the river, almost at the 170,000 threshold identified in your draft plan. We appreciate that BOR recognizes in the draft long-term plan that, regardless of the run size forecast, other conditions can develop in the Lower Klamath that will cause it to consider flow augmentation. These conditions include disease infections on adult salmon, water temperature, densities of adult salmonids at thermal refugia areas, and fisheries performance data. Also, please anticipate that we will have additional comment on the 170,000 proposed threshold, including the possibility of recommending a lower value, after we have had the opportunity to review the analysis that formed the proposed value.

Although the adult run size does not meet the proposed threshold for consideration of flow augmentation, and the in-river condition of the salmon will not be known until they enter the 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 the Interior work with the Klamath Basin's biologists and scientists to determine the best manner for using this water to minimize the potential for another fish kill.

In closing, the Pacific 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 become, or are predicted to become, dangerous to migrating Chinook salmon in the late summer and fall of 2015. 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,



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

JDG:kma

cc: Council Members
Mr. Thomas P. O'Rourke, Chair, Yurok Tribe
Ms. Danielle Vigil-Masten, Chair, Hoopa Tribe
Habitat Committee Members
Salmon Advisory Subpanel Members
Mr. Chuck Tracy
Mr. Mike Burner
Ms. Jennifer Gilden