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[PACFISH Strategy] [Loose]

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AMERICAN
FOREST &
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June 11, 1993

The Honorable Katie McGinty
Director, Office of Environmental Policy
The White House
Washington, D.C.

Dear Katie:

The day before yesterday, our scientists were briefed by Bureau of Land Management and Forest Service personnel on the so-called PACFISH Strategy. This strategy is an extremely broad-reaching, high cost "solution" to a problem -- a lack of anadromous fish habitat -- that fortunately does not exist. Because the Agency briefers were emphatic the PACFISH Strategy will be an integral part of President Clinton's Pacific Northwest Forest Plan, I felt I had better share our concerns with you and others immediately.

At great expense, the PACFISH strategy seeks to develop or restore to pristine conditions all fish habitat on federal forest lands in the Pacific Northwest. Fish habitat is only limiting if you have an excess of fish returning to spawning streams draining federal forests. However, the opposite is the case. As a consequence of overharvest and dams, there is a shortage of fish. Therefore, even "if you build it," they will not come.

In the introduction of the Executive Summary (pages 2-3), the PACFISH report provides a description of the causes of fish decline -- the four "H's." With even a cursory review of these four factors, it becomes readily apparent that the primary decimators of fish are dams. "The demise of a large majority of the extinct stocks [and the continued loss of others as well] is attributable to dam construction and operation." Few fish survive the double gauntlet of numerous dams on the trip to the ocean and back to spawn. Those that do face indiscriminate over harvest (commercial fishing, natural predation, subsistence and sport fishing), both at sea and en route. As also noted in the Executive Summary, these decimating factors are further compounded by mis-guided, traditional hatchery practices which, alone, limit the recovery of more than half of the so-called stocks at risk.

The last element identified is habitat. A quick comparison with the other three H's readily shows that habitat impacts are the least important. It is true all stocks are "affected" by habitat conditions. All organisms are influenced by the habitat, but those effects are not always limiting. Further, even with excess populations (not the case here), it is not necessary that all individuals in the population live in pristine or optimum conditions.

Our biologists insist that -- as we indicated at our April 19 meeting with you -- it is basic strategy that in order to stabilize or increase a species population size, you must address the limiting factors. To use a homely analogy, picture a rain barrel full of water. The

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barrel is old with some staves broken and thus shorter than others. The barrel will hold water only up to the point of the shortest barrel staff. In this case the shortest staff is "Hydroelectric." The next tallest is fish "Harvest." Habitat is one of the tallest. You will not be able to hold any more water in the barrel by repairing (extending the length) of the "Habitat" staff. The "Hydroelectric" staff is still the shortest and water (salmon) will continue to be lost at that point.

The briefers this week indicated a desire to move immediately to modify federal forestry practices even though they readily conceded that the costs in harvest volumes forgone would be significant. The latter admission squares with the rumors that we have been hearing from the efforts of the Forest Ecology Task Group that has been working in Portland.

The briefers specified further that Appendix S-K of the SAT Report would be implemented on an interim basis before the Forest Service or BLM conduct any of the analyses required by the National Forest Management Act, the Federal Land Policy and Management Act, and the National Environmental Policy Act. The standards and guidelines in this Appendix are clearly inconsistent with the existing land management plans. Please be aware that the forest products industry already has one lawsuit and one administrative appeal pending which challenge policy decisions by the Forest Service affecting forest management without proper analysis or amendment of the underlying forest plans.

However, since April 2, we have followed President Clinton's request to refrain from new litigation in the Northwest while the Administration considers these difficult questions. We transmitted our commitment in this regard to the President by letter of April 6, 1993. By contrast, the environmental community has filed, or threatened to file, at least 4 legal actions in the region. We will be hard pressed to refrain from challenging another "interim" policy which amends existing plans without the required analyses and public participation, particularly when our own scientists question the existence of any emergency regarding habitat.

It simply is not justifiable to expend such energy and resources to develop prime habitat for stocks that will continue to decline if the other three H's are not corrected. The Forest Service/BLM claim at this week's briefing that "habitat is the only factor they control" as the justification for such a drastic program is ludicrous. While some specific habitat restoration projects (in-stream pool development, road and culvert maintenance, etc.) may be justifiable, the broad-scale strategy described in the PACFISH report, and apparently about to be implemented by President Clinton, is premature.

As always we appreciate the opportunity to present our views to you, and your willingness to consider them. We will be glad to meet with you on this matter if you wish.

Sincerely,



Mark Rey

cc: Jim Lyons
Tom Collier
Tom Tuchmann