



# Animal Welfare Institute

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Puget Sound Partnership  
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To whom it may concern:

On behalf of the members and constituents of the Animal Welfare Institute (AWI) I am submitting these comments on the draft recommendations of Governor Inslee's Southern Resident Killer Whale Recovery and Task Force (Task Force). It is clear, given the public input to the previously released draft report, that there is intense interest in swift and decisive action that will lead to the recovery of the southern resident orcas (SRKWs). AWI submitted written comments on the Task Force's draft report, published on September 24, and we thank the Task Force for the opportunity to once again voice our concern and provide input to its work.

All of our specific suggestions for the Task Force regarding its November 16 report are *in bold italics*.

## Overall Comments

### *Habitat Restoration*

AWI fully supports the Task Force's goal of habitat restoration for Chinook salmon and urges the Task Force to be vigilant in achieving this goal. This summer, the National Oceanic and Atmospheric Administration (NOAA) Fisheries rated 31 populations of Chinook salmon based on their importance to orca recovery. Of those, two of the top 10 stocks are from the Snake River, while another three stocks come from the Columbia River. These Chinook, vital to orca recovery, are suffering massive population loss due to dams on these rivers; in fact, several Chinook stocks are listed as threatened under the Endangered Species Act (ESA).

NOAA Fisheries further lists "habitat loss from dam construction and urban development" as a primary contributor to the plight of the Chinook salmon in the region. We remain steadfast in our belief that only strategic dam removal will achieve the results desired by the Task Force and the public, and that it is unrealistic to proceed as if anything other than such dam removal will recover the Chinook and the SRKWs.

While we are supportive of the underlying nature of Recommendation 7 (see below), we are disheartened that the Task Force failed to include "Potential hydropower recommendation 2," "Potential hydropower action 15," and "Potential hydropower action 16" from its draft report in this iteration of recommendations. We strongly supported these potential recommendations, which called for concrete steps toward *removal*—as opposed to modification—of barriers to fish passage. If the Task Force had been serious in its mission to institute effective policies aimed at

restoring functional ecosystems in the Columbia River Basin and Washington state waters, dam removal would have certainly been included in these draft recommendations.

As populations of salmon and SRKWs decline, this is not the time for further studies and debate. Immediate and strong action is needed in order to restore these species to healthy population levels. The dams, culverts, and other barriers throughout the Columbia River basin have had, in our opinion, the single most damaging impact on salmon stocks and SRKWs. Dam *breaching*, rather than fish passage improvement, must be the number one priority of the Task Force in its final report.

### *Lethal Removal of Pinnipeds*

***AWI vehemently opposes Recommendation 13.*** Frankly, the proposed lethal removal program *will not work* and is being pursued for political expediency. It is telling that the Task Force has once again failed to clarify that fisheries remove at least 200 times more adult Chinook salmon from the ecosystem than pinnipeds do at “pinch points” such as the Bonneville Dam. In 2017, 1,337,301 Chinook salmon were removed from the ecosystem by Pacific Salmon Treaty Fisheries, as opposed to 6,663 salmon annually—not all of which were Chinook—by pinnipeds at Bonneville Dam. It remains a concern that the Task Force continues to portray this unwarranted lethal management of pinnipeds as a measure beneficial to orca recovery, without any supporting scientific evidence.

### *Public Sentiment*

With the majority of public comments received during the previous public comment period supporting the removal of key strategic dams and opposing the lethal removal of pinnipeds, it is of concern to us—and telling with regard to the underlying political agenda of some Task Force members—that the Task Force has chosen to ignore public sentiment on these two important issues.

The Task Force itself notes that throughout its publicly held meetings, representatives from the commercial fishing industry, government agencies, non-profits, Indian tribes, and concerned citizens have all spoken to the Task Force in favor of dam removal. In its *Summary of Public Comments on 9/24 Report*, the Task Force notes that the most prevalent comment received, of the 994 total comments relating to hydropower, called for dam removal. Indeed, 36.7 percent—or 365 comments—said “breach the lower Snake River dams,” while an additional 10.4 percent—or 103 comments—said to “prioritize and remove dams in general.” The Task Force, however, has failed to include any recommendations that lead directly to removal of dams, strategically or otherwise.

Regarding public comment on the previously released potential recommendations, the Task Force notes, “The most common comment received was a lack of support for lethal removal of pinnipeds (23.2 percent of comments), with many people expressing that predation is not the major threat to address for Southern Resident recovery (18.6 percent).” With so many public comments submitted to the Task Force expressing some form of opposition to the lethal removal of pinnipeds, it is disappointing that the Task Force continues to push for lethal management.

## *Illusion of Action*

We are dismayed by the Task Force's inclusion of several relatively inconsequential recommendations, while failing to produce the "swift near-term actions and effective long-term actions necessary to recover these iconic and endangered animals," as directed by Governor Inslee's Executive Order establishing the Task Force. As noted above, SRKWs and Chinook salmon are declining toward extinction, a fact we had hoped would result in bold recommendations from the Task Force. In reality, the Task Force has failed to include many of the recommendations it proposed in its earlier draft report that qualified as "swift" and "effective," which are the only actions that will, in our opinion, result in orca recovery. We urge the Task Force to reject "low-hanging fruit" and "window dressing" actions, and reinstate recommendations that would result in immediate and decisive benefits.

## Detailed Comments

Recommendation 7: While we support improving fish passage over dams that cannot and will not be removed, this should not take priority over removing barriers that can be removed. ***AWI strongly urges the Task Force to include proposals for strategic dam removal—as opposed to only modification—in its final report.***

Recommendation 9: It is concerning that the sole recommendation related to dam removal in these draft proposals calls for yet more study and deliberation, as opposed to breaching. ***AWI strong opposes the inclusion of this recommendation in the final report, as it is hardly the bold action the SRKWs need.***

Recommendation 10: ***AWI opposes the inclusion of this recommendation in the final report*** because the Pacific Salmon Treaty does not support closing Chinook fisheries for some period of time. We believe such closures are essential to help restore Chinook runs.

We once again thank Governor Inslee and the Task Force for the opportunity to offer input to this important process. We look forward to the final report from the Task Force to be issued on November 16.

Sincerely,



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