Sharon Grace 175 Gretchen Way Friday Harbor, WA <u>sharon.grace@srkwcsi.org</u> 360-378-3377

November 1, 2017

By Electronic Submission

Puget Sound Leadership Council

Re: Resolution 2017-01 Accelerating and amplifying Chinook salmon recovery for Southern Resident Killer Whales

Dear Council:

I urge you to table Resolution 2017-01. It will neither accelerate nor amplify Chinook salmon recovery for Southern Resident Killer Whales.

The single most significant issue facing the Southern Resident Killer Whales (aka Southern Resident orcas) is lack of food. They are malnourished and periodically starving because runs of Chinook salmon are dwindling coast wide. Lack of food magnifies their susceptibility to infections, toxins and other harms. The elephant in the room is the four lower Snake River dams. The dams need to be breached, if we are serious about recovering the Southern Resident Killer Whales (aka Southern Resident orcas, SRKWs).

The SRKWs are one of the eight most critically endangered marine species, according to NOAA. After nine deaths over the last two years, only 76 remain on earth. If the Southern Residents are not a remnant population today, they will be very soon, unless radical action is taken immediately.

In the 2016 Action Agenda for Puget Sound, Comprehensive Plan, the Washington State Legislature identified six ecosystem recovery goals for creating a resilient Puget Sound. One of these six goals is a "Thriving Species and Food Web—Healthy and sustaining populations of native species in Puget Sound, including a robust food web." For this goal, the Vital Sign—the measurement of recovery in Puget Sound—the Southern Resident Killer Whales are the *single indicator*. The 2014 Interim Target was 89 whales. The 2020 Target is 95 whales. As the 76 fish eating orcas indicate, we are going in the wrong direction for thriving species and a thriving food web in the Puget Sound region.

The PSP needs to take immediate action to save these whales. Action and research are not mutually exclusive. Supporting state wide, as well as regional action, are not mutually exclusive. Both can be done at the same time. Actions can be changed based on new research as it comes in. Indeed, this is the principal of adaptive management—a principal that has been twisted to permit indecisiveness.

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Waiting to take action to provide more prey for the SRKWs pending more studies is simply a means to promote earlier extinction of the fish eating orcas. Supporting the "Washington Way" and Balkanizing action is simply a means to promote earlier extinction of the orcas. It is tinkering around the edges.

The SRKWs need prey all year, every month, every week, and likely every day if they are to have a chance at recovery. Tinkering around the edges is no longer feasible. It hasn't worked. The whales' prey base needs to be increased greatly and rapidly, if we want to have them around for future generations. These whales are in dire straits, figuratively and literally. Chinook populations, 80% or more of the orcas' diet, are dwindling all along the coast. The free flowing Snake/Columbia River system historically sustained these orcas. As predicted, once the four lower Snake River dams were constructed, already dwindling migratory fish runs plummeted.

Recent unpublished NOAA research shows that 54% of the SRKWs' diet originates in the Snake/Columbia River system. The Fish Passage Center recently reported that if the four lower Snake River dams were to be breached and spill were to be increased, there could be up to a four-fold increase in salmon and steelhead returning to the Columbia Basin. *Draft 2017 Comparative Survival Study of PIT-tagged Spring/Summer/Fall Chinook, Summer Steelhead, and Sockeye*, August 2017, p. 62. This would be huge for the orcas.

Washington State already is promoting increased spill for the eight mainstem dams in the Snake/Columbia power system. It needs to support breaching the four lower Snake River dams, as well.

A two to four fold increase in salmon and steelhead from the Snake/ Columbia rivers system would contribute massively to coast wide salmonids runs, meaning more fish for fisheries, predators, and orcas in particular, and more spawners and nutrients entering the waters of Washington State. In turn this would mean that due to increased abundance coast wide, more salmon would survive to return to the Puget Sound region and more salmon would stave off extinction for the SRKWs.

Resolution 2017-01 is ill conceived. Scientific certainty is not the standard to be used in recovering SRKWs. The best available science is. Since 54% of the whales' diet originates in the Snake/Columbia system, and this is the existing best available science, please support breaching the four lower Snake dams, so the whales can exist for future generations.

Sincerely,

Sharon Grace

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