September 24, 2018

To members of the Governor's Orca Task Force,

As advocates for salmon and orca recovery, we ask that you focus your efforts on projects that have a high likelihood of success, yield the most environmental benefit for every dollar spent, and provide benefits in the near term. For this reason, you should reject efforts to spend time and resources focusing on the four Lower Snake River Dams.

Put simply, destroying the dams is a deadly distraction for orca.

Three key considerations stand out.

First, NOAA Fisheries has been clear that destroying the dams would have, at best, a "marginal" benefit for orca. In a 2016 fact sheet on the "Southern Resident Killer Whales and Snake River Dams," they conclude, "the relative size of the Snake River salmon stocks compared to others on the West Coast means that increases in their numbers, whether from breaching dams or otherwise, would result in only a marginal change in the total salmon available to the killer whales."¹ Given the dire circumstances of the Southern Resident Orca, the task force should not spend time on approaches that are "marginal."

This conclusion was reinforced this year in research done by NOAA Fisheries and the Washington State Department of Fish and Wildlife. They ranked "Priority Chinook Stocks" for Southern-resident killer whales. The Snake is tied for ninth. Focusing so many resources on the Snake makes little sense.

Second, NOAA Fisheries and other experts note that destroying the dams may do little to help salmon along the Snake. Populations of wild and hatchery fish have dramatically increased in the last 20 years, and survival rates are very high.

In their latest report last year, they note that juveniles would face some additional challenges if the dams were removed.² NOAA Fisheries points out, "turbidity would increase dramatically for the first several years with much of the sediment transport occurring in the spring months." They also indicate, "the large existing population of predators would be concentrated into smaller volume of the unimpounded river, potentially increasing predation rates." How these factors would play out, especially in the near term is difficult to predict. This is one reason Peter Kareiva, a member of the National Academy of Sciences who has been studying the impact of the dams for two decades wrote recently that, "it is not certain that dams now cause higher mortality than would arise in a free-flowing river."³

¹ NOAA Fisheries, "Southern Resident Killer Whales and Snake River Dams," 2016, <u>https://www.westcoast.fisheries.noaa.gov/publications/protected_species/marine_mammals/killer_whales/killer_whales_snakeriverdams.pdf</u>

² NOAA Fisheries, "ESA Recovery Plan for Snake River Spring/Summer Chinook Salmon (Oncorhynchus

tshawytscha) & Snake River Basin Steelhead (Oncorhynchus mykiss)," November 2017, <u>https://bit.ly/2D6NZFQ</u> ³ Kareiva, Peter and Carranza, Valerie, "Fealty to symbolism is no way to save salmon," 2017, <u>http://www.oxfordscholarship.com/view/10.1093/oso/9780198808978.001.0001/oso-9780198808978-chapter-15</u>

Finally, there are many projects that would help salmon and orca in the near term. There is admirable and bipartisan support for increasing hatchery production, for reducing the competition for salmon from pinnipeds, and for funding efforts to remove culverts and prioritize efforts in the Salish Sea that offer the greatest benefit in the near term for salmon and orca. If we divert time and resources from these efforts, we risk putting politics ahead of science and the orca will pay the price.

None of this addresses the high economic cost to Eastern Washington farm communities and the state's electrical rates generally. About ten percent of U.S. wheat production travels down the Snake. Destroying the dams would reduce access and increase costs for our farmers.

The plight of the Southern Resident orca has become more moving and more critical this summer. Faced with the emotional scenes of Tahlequah carrying her dead calf and the recent loss of J50, the task force should redouble its commitment to following sound science and ensure we focus on efforts that will have the most benefit in the near term.

Sincerely,

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