November 20, 2007

Mr. Robert H. Lohn, Regional Administrator
NOAA Fisheries
7600 Sand Point Way NE
Seattle, WA 98115-0070

Dear Mr. Lohn,

As research scientists who have spent decades studying fish-eating (“resident”) killer whale (*Orcinus orca*) populations in the Pacific Northwest, we are writing to call for your leadership to protect and restore abundant, self-sustaining wild salmon and steelhead populations in the Snake and Columbia Rivers. As you are well aware, Columbia and Snake River salmon are intricately linked to the continued existence of Puget Sound’s Southern Resident killer whale population.

The Southern Resident killer whale population, like many of the once-abundant Columbia River Basin salmon and steelhead stocks, has been listed as endangered under the Endangered Species Act. We cannot hope to restore the killer whale population without also restoring abundant salmon upon which these whales have depended for thousands of years. As your own scientists have said, “[p]erhaps the single greatest change in food availability for resident killer whales since the late 1800s has been the decline of salmon in the Columbia River basin” (Proposed Recovery Plan, p. 82).

In addition to the clear science connecting these two icons of the Northwest, the federal government has a legal obligation to restore populations of salmon and killer whales. Yet, from all appearances, the forthcoming Federal Salmon Plan (FCRPS Biological Opinion) will continue the failed management practices of the past. The draft plan relies heavily on actions implemented over the past 25 years, but that science and time have proven will not restore these fish to the levels necessary for self-sustaining populations of salmon or abundant enough to provide a healthy food resource for these killer whales.

Documented sightings of Southern Resident killer whales at the mouth of the Columbia River during the winter months, especially L pod (as noted in NOAA’s *Draft Proposed Recovery Plan for Southern Resident Killer Whales*), underline the importance of this source of food for the whales. Considering that salmon coming out of the mouth of the Columbia each year historically numbered in the 10-16 million range, this was an important source of food for these whales during the crucial winter months. Many of the Columbia Basin salmon runs, especially fall chinook, migrate close to the coast where Southern Residents are frequently spotted during winter research cruises. Given the likely importance of chinook as a favored prey for the whales, and the potential for increased numbers of chinook should historic runs be recovered, the best available science demands that your agency take more seriously its mandate to restore Columbia Basin salmon. Beyond the importance of restoring salmon for their own sake, we must consider the impact those species have on the recovery potential for the Southern Resident killer whales.

The Columbia and Snake River Basin was once the world’s most productive salmon watershed. Today, only about 1% of the historic number of fish return. Over 200 large dams on the Basin’s rivers are the major cause of its salmon extinction crisis, with 13 populations now listed under the Endangered Species Act. Yet the Columbia-Snake Basin still holds more acres of wild land and miles of wild river than any watershed in the lower 48 states. It is this opportunity for salmon and steelhead
recovery that we must take advantage of as the last best hope for a substantial increase in prey availability for Southern Resident killer whales during the critical winter months.

The science is clear that removing four federal dams on the lower Snake River is needed to avert extinction of the Snake’s four unique salmon populations that migrate up to 900 miles inland from the ocean, but now face an eight-dam gauntlet. Coupled with sound harvest, appropriate land-use regulation, and hatchery/aquaculture reform, lower Snake dam removal could restore salmon abundance to 15 million acres of forest, high desert, and wilderness areas for productive use by people, communities, and iconic predators like the Southern Resident killer whales.

Removing those four outdated dams would: restore 140 miles of the Snake River to a more natural, free-flowing state, substantially increasing available spawning habitat for Snake River fall chinook; prevent extinction and allow restored abundance of wild salmon and steelhead to prime, nearly untouched habitat in eastern Washington, eastern Oregon and Idaho; and greatly increase the availability of a critical food source for endangered Southern Resident killer whales, particularly chinook salmon during the winter months. It will also help prevent extinction of the Northwest salmon species that are most likely to come through the warming decades ahead – because their high-elevation spawning streams will warm the least. Climate change effects are a key factor in the survival of species such as salmon and killer whales, and we urge NOAA Fisheries to include climate change adaptation in their formulation of recovery plans for these and other species.

We call on your agency to follow the science and include removal of the four lower Snake River dams as an essential element of a real recovery plan for these extremely important fish stocks. The recovery of Southern Resident killer whales depends on abundant food, which will be difficult if not impossible to provide without restoring productivity from the Snake River components of Columbia Basin salmon runs.

Thank you for your consideration of our comments. Please include this letter and its signers as part of the official public comment for the draft Federal Columbia River Power System biological opinion. We are also sending this letter to our members of Congress to urge their leadership to resolve this issue of critical regional and national significance.

Sincerely,

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President of the Board,
The Whale Museum

CC: United States Senators, United States Representatives, West Coast Governors