



February 18, 2008

Garth Griffin
National Marine Fisheries Service – Northwest Region
Protected Resources Division
1201 NE Lloyd Boulevard, Suite 1100
Portland, OR 97232

Re: Comments on Draft Environmental Assessment for Reducing the Impact on At-risk Salmon and Steelhead by California Sea Lions, January 11, 2008

Dear Mr. Griffin:

Northwest RiverPartners appreciates the opportunity to provide the following comments on the Draft Environmental Assessment (EA) considering actions to reduce seal and sea lion predation on salmon and steelhead listed as threatened and endangered under the Endangered Species Act (ESA) below Bonneville Dam (BON). Northwest RiverPartners is a broad coalition of utilities, businesses and river users in the Pacific Northwest dedicated to promoting the use of best science and cost-effectiveness in regional efforts to protect and recover salmon and steelhead species.

Northwest RiverPartners' supports NOAA-Fisheries' proposal, based on recommendations from a task force which relied on the best available science, to allow for lethal take of up to 30 of the worst offending California sea lions. Sea lions are accountable for upwards of 4% mortality of spring Chinook and steelhead migrating past the dam, and other, non-lethal, methods have proven ineffective. While killing these animals is our last choice, it is a necessary one. Significant investments are being made throughout the Columbia River basin to protect and enhance salmon and steelhead populations. This source of ever-growing, unmanaged mortality constitutes a significant drawback to effective recovery of ESA-listed populations and undermines these investments.

High levels of sea lion predation have been carefully documented over the last several years. Predation by California sea lions in the vicinity of the dam was negligible until 2002. Since then, a minimum of 271 separate, identifiable individuals have been observed in the vicinity. They are arriving earlier each year, staying for a longer period of time and consuming more salmon and steelhead each year. In 2007, California sea lions consumed upwards of 4% of the spring chinook and steelhead migrating past the

dam. The states have estimated that California sea lions could be consuming 13,000 salmon each spring in the Columbia River! They also consume a significant number of Pacific lamprey, a culturally important species.

Recent efforts to control predation by California sea lions have proven ineffective. The U.S. Army Corps of Engineers (Corps) has been working with the States of Oregon and Washington to reduce predation by sea lions since 2005. Actions utilized to date include installing gates in fish ladders to exclude sea lions, installing acoustic deterrents and conducting non-lethal harassment from boats and the dam. The Corps has expanded the program each year, but these deterrent activities have been ineffective at reducing predation by California sea lions. However, the activities have been effective in reducing predation on white sturgeon by Steller sea lions.

On December 5, 2006, the States of Idaho, Oregon and Washington applied to the Secretary of Commerce for authority to remove individual California sea lions in accordance with the Section 120 of the Marine Mammal Protection Act (MMPA). In September, 2007, NOAA-F convened a task force to review the States' application, public comments on the application, and other information related to sea lion predation on salmon and steelhead at Bonneville Dam. On November 5, 2007, the task force approved the States' application for lethal take authority, while they continue non-lethal deterrence measures.

NOAA-F has considered four alternatives in their Draft EA. We support implementation of the Proposed Action, Alternative 3: *Modified Task Force Recommendation – Lethal Removal of Individually Identifiable Predatory Sea Lions After Active Non-lethal Deterrence*. The Proposed Alternative allows a measured and careful response to immediately reduce predation by California sea lions, while continuing non-lethal hazing operations which have been effective in reducing predation on white sturgeon by Steller sea lions. We would also urge that NOAA-F work with the region to develop an effective long-term deterrence program that precludes the need for lethal deterrence.

We do not support the other three alternatives for the following reasons. Alternative 1: *No Action* precludes the use of non-lethal harassment activities that have been useful in deterring predation by Steller sea lions. Alternative 2: *Non-lethal Deterrence Only* has been demonstrated over the last three years to be ineffective in reducing predation by California sea lions. Alternative 4: *Unmodified Task Force Lethal Option 2 - Lethal Removal of All California Sea Lions Sea Lions Above Navigation Marker 85 With No Requirement for Prior Active Non-lethal Deterrence* could result in removal of transient animals that may not be the source of significant predation, would likely be unacceptable to the public, and would cause significant disruption of travel and access in the vicinity of the Bonneville Dam.

In summary, the region has allocated significant resources to recovering salmon and steelhead stocks in the Columbia River Basin. Predation by California sea lions represents a significant, yet currently unmanaged and unacceptable loss of adult salmon and steelhead returning to the Columbia River. We support a measured and

sustainable program to balance the need for a healthy sea lion population, while supporting the region's goal of successfully recovering salmon and steelhead.

Thank you for the opportunity to comment on this important public policy issue. We hope our comments are insightful and helpful. If you have any questions or need further information please do not hesitate to contact me at (503) 274-7792.

Sincerely,

A handwritten signature in cursive script that reads "Terry Flores". The signature is written in black ink and is positioned above the typed name.

Terry Flores, Executive Director
Northwest RiverPartners

Columbia River Intertribal Fish Commission
Northwest Power and Conservation Council
Northwest Congressional Offices
US Army Corps of Engineers
Bonneville Power Administration