



Wild Fish Conservancy

N O R T H W E S T

S C I E N C E E D U C A T I O N A D V O C A C Y

On March 24, 2008, Wild Fish Conservancy joined the Humane Society of the United States and two private citizens in filing a lawsuit asking the US District Court of Oregon to prevent NOAA Fisheries from allowing the lethal removal of California sea lions from the lower Columbia River in the vicinity of Bonneville Dam. NOAA Fisheries issued the permit to the states of Idaho, Oregon, and Washington in response to a permit application they submitted under the Marine Mammal Protection Act (MMPA). We oppose the issuance of the permit because the case has not been made that the estimated level of sea lion predation is “having a significant negative impact on the decline or recovery” of the listed spring chinook and steelhead stocks.

Sea lions eat salmon; we do not dispute that. But the proper way to invoke the MMPA and remove offending sea lions is to: 1) measure each potential source of mortality to salmon and steelhead in the Columbia mainstem and tributaries, 2) articulate a quantitative standard for finding that California sea lions in the Columbia River are having a significant negative impact on listed salmonid stocks; 3) compare the estimated level of removals of ESA-listed salmonids by sea lions with authorized levels of incidental and directed take from other sources, and explain why some sources are considered significant while others are not, and 4) identify the level at which predation by sea lions is no longer significant and adopt that level as the goal of any authorized removal program. NOAA has not done that.

The four points listed are not solely our position; they are also the position of the Marine Mammal Commission, an entity created by the MMPA to advise NOAA on scientific matters. NOAA ignored their repeated comments.

If the take by sea lions (ranging from 0.4 to 4.2%) is inhibiting recovery, then how can NOAA consider permitting an “incidental harvest mortality impact” of 12% in 2008, and continue to allow 19% take by the hydroelectric dam operators? Any fish saved by sea lion removal will likely only be lost in increased harvest levels, and therefore would be unlikely to contribute to recovery--which is supposed to be the beneficial result of sea lion removal. It is clear that NOAA does not want to objectively look at the real problems inhibiting recovery: dam operation and over-harvest.

Our highest priority should be more wild adult salmon and steelhead reaching the spawning grounds. In order to achieve that, objective harvest reform should be our short term goal and minimizing mortality at the dams the long-term goal. Pressuring the agencies to address what is truly important is our best strategy to lead to recovery of our wild fish.

Kurt Beardslee, Executive Director