



August 23, 2018

Stephanie Solien, Co-Chair
 Thomas (Les) Purce, Co-Chair
 Southern Resident Killer Whale Recovery and Task Force
 Office of the Governor
 PO Box 40002
 Olympia, WA 98504-0002

RE: Comments to the Southern Resident Killer Whale Recovery and Task Force

Dear Task Force Co-Chairs Solien and Purce:

We are writing to provide input on the list of Prey: Habitat actions that the Task Force is developing to ultimately aid in the recovery of the Southern Resident Killer Whales (orcas). We agree with many of the recommended actions described in the attached 8/13/2018 list.

As your Task Force prepares a draft report by October 1, 2018, in response to Governor Inslee’s Executive Order 18-02, we underscore the importance of looking at overall watershed health and function from the headwaters to the salt waters in fulfilling the directive that “The Task Force shall work with all levels of government and other partners to identify needed policies and programs, recommend priority actions to support recovery efforts, highlight budget needs, and recommend any legislation needed to support this Executive Order.”

Many of our organizations do considerable advocacy on federal land management including national parks and national forests. These federal lands often include the headwaters of the Puget Sound and the Columbia Basin. The health of these federal forests and watersheds directly impacts the main food source for orcas – salmon. We strongly support the habitat actions to increase prey in the 8/13/2018 list, while we suggest that greater detail to identify specific opportunities on federal lands to preserve and improve the condition of Puget Sound and Columbia Basin uplands be included in the report prepared this fall.

Additionally, we urge the Task Force to recognize that with respect to salmon habitat we need to preserve what we have at the same time that we invest in restoring what we have lost. Orcas desperately need improvements in the health and abundance of their prey and their prey desperately need quality habitat. Neither orcas nor salmon can afford to have a deterioration of the intact and functioning watersheds that currently contribute to the existing population.

Support Restoration Planning on National Forest Lands and Legacy Roads and Trails Federal Funding

Salmon recovery plans throughout Puget Sound and the Columbia Basin recognize the importance of improving conditions on our public lands in the upper reaches of our watersheds. One of the greatest needs is for the state to work collaboratively with the U.S. Forest Service to address the salmon recovery issues associated with a deteriorating road network. While we require roads to manage and access our public lands, many miles are unnecessary and are negatively impacting salmon habitat conditions. Roads can contribute sediment to our rivers; block fish passage; disconnect floodplains; and channel water more quickly off of the landscape. When roads are located in riparian corridors, vegetation necessary to shade waters is removed and the accumulation of wood into the streams for habitat is often prevented. The national forest has direction to identify and implement a sustainable road network and their own analyses underscores the need for change. For example, on the Mt. Baker Snoqualmie National Forest, their sustainable road analysis found that 40% of their roads posed a high risk to aquatic resources (equating to 999 miles). The national forest has projects in the planning phase that can increase the condition of watersheds and directly improve salmon habitat from the Nooksack River watershed southward to the Upper White River watershed in Puget Sound. This planning should strongly consider how actions can contribute to the recovery of Southern Resident Killer Whales, while the end result has the potential to create shelf-stock of habitat restoration projects that will be ready for implementation as funding allows. In the comprehensive suite of habitat priorities that your fall 2018 report identifies, we request that you describe the need and the opportunity on our federal lands.

To truly improve salmon habitat, these projects on federal land require funding. In 2008, our federal delegation led an effort in Congress to establish a program to fund urgently needed road decommissioning, road and trail repair and maintenance, and removal of fish passage barriers titled the [Legacy Roads and Trails Program](#). Across the nation, this program has invested over \$300 million on national forest lands, including throughout the Puget Sound and Columbia Basin, emphasizing areas where Forest Service roads may be contributing to water quality problems in streams and water bodies that support threatened, endangered, and sensitive species or community water sources. In the Fiscal Year 2018 Omnibus, the program was eliminated as a

separate line item in the federal budget. Both the House and Senate Budgets for Fiscal Year 2019 include no funding for the program. It is time for Washington State, which helped establish this program, to reassert its leadership and partner with federal land managers to bring the forest road network into compliance with the Clean Water Act and our salmon recovery goals.

In support of *Prey: Habitat: Action D* identified in the 8/13/2018 memo to “Accelerate habitat restoration by increasing funding significantly to address current regional priorities, including fish blockages in areas most beneficial to SRKW”, we request that you specifically include the Legacy Roads and Trails Program.

Support federal policy and legislative proposals that maintain quality salmon habitat provided by headwaters and riparian forests.

In addition to restoring salmon habitat, it is equally important to permanently protect intact functioning watersheds, headwaters and streams that are providing clean water and salmon populations. Many of these upper watersheds exist on federal lands.

Federal lands are essential for the long-term health of our region. One of the best examples of how these healthy intact watersheds enhance and support our regional quality of life is the Puget Sound Basin. Cradled by iconic glacial peaks, Puget Sound is one of the largest and most ecologically diverse estuaries in the United States. As a unique place where enclosed coastal salt waters meet and mix with cool, clean, fresh water, Puget Sound supports one of the most productive natural environments in the world.

The source of this fresh water lies in the upper watersheds and low-elevation forests of the Cascade and Olympic Mountain Ranges. As these wild forests and rivers feed Puget Sound, they also support historically strong fish populations, our iconic resident orca whales, local farms and businesses, and clean and safe drinking water for millions of residents.

Watersheds protected by legislation and administrative policies ensure healthy stream and riparian habitat continue to support fish populations that contribute to orca recovery. Roadless Areas, remote intact wildlands designated through the Forest Service’s 2001 Roadless Rule, provide critical fish and wildlife habitat and are a source for clear, cold high-quality water. Numerous efforts in Congress and states are underway to weaken or eliminate roadless area protections and harm salmon, most notably House Bill 2936 and language in the Senate’s 2018 Interior Appropriations Bill. Similarly, Riparian Reserves established by the Aquatic Conservation Strategy, a key feature of the Northwest Forest Plan which governs federal lands in western Washington, provide robust streamside buffers throughout watersheds to protect and restore fish habitat and populations. The Forest Service has initiated regional plan revisions and may follow earlier proposals in Oregon to cut riparian protections by half or more. Giving orcas the best shot at recovery involves supporting effective administrative policies that promote healthy conditions for salmon on federal lands.

Federal legislation to designate wilderness and national parks, including the most recent Wild Sky Wilderness in 2008 and a subsequent effort in 2014 to add acreage to the Alpine Lakes Wilderness and to designate the Middle Fork Snoqualmie and Pratt Rivers under the Wild and Scenic Rivers

Act provide lasting and permanent protection from new dam construction, mining, some forms of logging, and other threats to intact watersheds that can negatively impact Chinook salmon production. While these legislative efforts to protect the headwaters of the Snohomish were successful, the Nooksack, Skagit, Stillaguamish and other watersheds have intact ancient forests and free-flowing rivers that remain unprotected. While these upper watersheds currently enjoy administrative protection, they do not have the certainty of long term legislative protection. The Task Force should prioritize permanent protection of the headwaters to ensure we protect the high-quality habitat that still remains.

Additionally, the Wild Olympics Wilderness and Wild and Scenic Rivers Act of 2017 would permanently protect key upper watersheds and intact forests on the Olympic Peninsula as well as several rivers that flow into the Puget Sound, the Strait of Juan de Fuca, and the Pacific Ocean.

In support of *Prey: Habitat: Action B* to “Enhance/change local, state, and federal protection regulations, especially for key Chinook/SRKW habitats or areas”, we suggest you include language to support maintaining protective administrative policy such as the 2001 Roadless Rule and Northwest Forest Plan’s Aquatic Conservation Strategy, and support the passage by the U.S. Congress of Roadless Area Conservation Act of 2018, the Wild Olympics Wilderness and Wild and Scenic Rivers Act of 2017 which would designate 126,000 acres of upper watersheds and intact forests and 460 miles of Wild and Scenic Rivers.

We appreciate the magnitude of your task and recognize that there are many urgent priorities needed for the recovery of this iconic species in Puget Sound and the Pacific Ocean, and we offer that amongst those your Task Force recognize the contribution of actions on our public lands in the upper watersheds of the broader Columbia Basin.

Thank you for considering our feedback.

Sincerely,

Wendy McDermott
Director, Puget Sound-Columbia Basin Programs
American Rivers

Tom Uniack
Executive Director
Washington Wild

Thomas O’Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater

Mitch Friedman
Executive Director
Conservation Northwest

Marlies Wierenga
Pacific NW Conservation Manager
WildEarth Guardians

Brad Throssell
State Chair
Washington Council of Trout Unlimited

Joseph Bogaard
Executive Director
Save Our Wild Salmon

Mark Sherwood
Executive Director
Native Fish Society

Mike Town
President
Friends of Wild Sky

Tom Hammond
President
North Cascades Conservation Council

Donna Osseward
President
Olympic Park Associates

Mark Boyar
President
MidFORC Coalition

Peter Bahls
Executive Director
Northwest Watershed Institute

Mike Petersen
Executive Director
The Lands Council

Rob Smith
Northwest Regional Director
National Parks and Conservation Society

Annie Cubberly
Polly Dyer Cascadia Broadband
Great Old Broads for Wilderness

Nicole Budine
Policy and Campaign Manager
Cascade Forest Conservancy

Jon Hoekstra
Executive Director
Mountains to Sound Greenway Trust

Timothy Manns
Conservation Chair
Skagit Audubon Society

Tom Glade
President
Evergreen Islands

Connie Gallant
President
Olympic Forest Coalition

Mark Leed
Chair
Loo Wit Group of Sierra Club

Rick McGuire
President
Alpine Lakes Protection Society

Kathy Johnson
Forest Practices Chair
Pilchuck Audubon Society

Timothy J. Coleman
Executive Director
Kettle Range Conservation Group

Quinn Read
Northwest Director
Defenders of Wildlife

John McGlenn
President
Washington Wildlife Federation

Alex Craven
Organizer
Sierra Club, WA State

Brenda Cunningham
Environment Committee
Indivisible Skagit

Andrea Matzke
President
Wild Washington Rivers

Cc: Steve Martin, Co-Chair, Prey Working Group
Penny Becker, Co-Chair, Prey Working Group
Washington Governor Jay Inslee