

WA Dept. of Ecology's Draft EIS and Short-Term Modification to Total Dissolved Gas Criteria for WAC 173-201A

Oral Testimony from Sristi Kamal, on behalf of Defenders of Wildlife

Received February 13, 2019

Good afternoon, for the record my name is Sristi Kamal. I am a researcher with a Ph.D. in ecology and I'm the senior northwest representative for Defenders of Wildlife. It is a national nonprofit organization that works to protect and conserve native and imperiled wildlife species and their habitat and has over 1.8 million members nationwide.

Today I would like to take the opportunity to talk about the flex spill agreement among BPA, the U.S. Army Corps of Engineers, Bureau of Reclamation, the states of Oregon and Washington, the Nez Perce tribe, Bureau of -- on increasing the total dissolvable gas standards, or TDGs, by establishing a new spill regime over the water over Columbia and Snake river dams to benefit young salmon in their migration to the sea.

First of all, I would like to express our appreciation over the short-term modification to increase spill standards as the spill has proven to increase juvenile salmon revival to the ocean and increase adult returns. Defenders' focus on salmon and salmon recovery is especially because of its impact on the southern resident orcas. The decline of Chinook salmon populations in the Columbia basin and across the Pacific Northwest marine waters correlates strongly with the decline in orca survival and productive success, especially in the last several decades.

The orca population today is at a 30-year low with only 75 individuals remaining. Decades of industrial development on the rivers of this basin have made the salmon's journey much more difficult and in some case impossible. As dams slow the rivers, salmon population in the basin crash leaving this population of orcas without one of their most critical sources of food.

These dams and reservoirs kill as much as 70 percent of the outmigrating juvenile salmon and more than 15 percent of the returning adults. So as go the salmon, so goes the orcas, which is why I see this agreement as a significant positive step towards salmon and orca recovery.

This is one of the few things that the state can do to provide more salmon for orcas in just a few years. The more fish that are spilled, the more fish that return to the river as adults to spawn.

Adjusting TDG criteria to increase spill would also be consistent with the current recommendations from Governor Inslee's orca task force, may help harmonize water quality standards with Oregon. We are also looking to increase the TDG to 125 percent. And could

simplify the U.S. Army Corps of Engineers' implementation of the spill program at its federal dams on the lower Snake and Columbia rivers.

Finally, while the current agreement is a much needed positive move in the direction of salmon and orca recovery, it begs the question of why the agreement didn't aim for 125 percent in 2019 instead of waiting for 2020. Given the recent deaths and the urgency of orca situation, it is critical we do as much as we can and as soon as we can.

Latest science has also shown that our original TDG standards are overly conservative and that we can get to 125 percent without impacting fish and other wildlife.

Additionally, as we embark on this three-year agreement, I urge you to plan ahead and think necessary actions in these three years that will ensure that the standards stay at this level beyond the three years and that both salmon and orcas have a fair chance of survival and recovery in the Pacific Northwest for present and future generations of Washingtonians and Oregonians.

Thank so much for your time.