



Friends of the San Juans responses for Governor Inslee's Southern Resident Orca Task Force comment survey on the [updated draft recommendations for actions](#) to recover Southern Resident Killer Whales (SRKW).

Comments must be submitted no later than midnight, Monday October 29, via the Task Force [online public comment portal](#).

For those unable to access the online portal, comments may also be submitted by U.S. Mail to:

Puget Sound Partnership  
ATTN: SRKW DRAFT RECOMMENDATIONS  
326 East D St  
Tacoma, WA 98421

Survey questions and Friends of the San Juans' survey answers and comments which are highlighted in yellow:

**Goal 1: Increase Chinook abundance**

1. Draft recommendation 1: Significantly increase investment in restoration and acquisition of habitat in areas where Chinook stocks most benefit Southern Resident orcas.

Please indicate your support or opposition for this recommendation:

**Strongly support**

2. Draft recommendation 2: Immediately fund acquisition and restoration of nearshore habitat to increase the abundance of forage fish for salmon sustenance.

Please indicate your support or opposition for this recommendation:

**Strongly support**

3. Draft recommendation 3: Enforce laws that protect habitat.

Please indicate your support or opposition for this recommendation:

**Strongly support**

4. Draft recommendation 4: Immediately strengthen protection of Chinook and forage fish habitat through legislation that amends existing statutes, agency rulemaking, and/or agency policy.

Please indicate your support or opposition for this recommendation:

**Strongly support**

5. Draft recommendation 5: Develop incentives to encourage voluntary actions to protect habitat.

Please indicate your support or opposition for this recommendation:

**Support**

6. Draft recommendation 6: Increase hatchery production and programs to benefit Southern Resident orcas consistent with sustainable fisheries and stock management, available habitat, recovery plans, and the Endangered Species Act. Hatchery increases should be done in concert with increased habitat protection and restoration measures. Please indicate your support or opposition for this recommendation:

**Support**

7. Draft recommendation 7: Prepare an implementation strategy to re-establish salmon runs above existing dams, increasing prey availability for Southern Resident orcas. Please indicate your support or opposition for this recommendation:

**Support**

8. Draft recommendation 8: Increase spill to benefit Chinook for Southern Residents by adjusting Total Dissolved Gas allowances at the Snake and Columbia River dams. Please indicate your support or opposition for this recommendation:

**Strongly support**

9. Draft recommendation 9: Determine whether removal of Lower Snake River Dams would provide benefits to Southern Resident orcas commensurate with the associated costs, and implementation considerations.

Please indicate your support or opposition for this recommendation:

**Strongly support**

10. Draft recommendation 10: Support full implementation and funding of the 2019–2028 Pacific Salmon Treaty.

Please indicate your support or opposition for this recommendation:

**Support**

11. Draft recommendation 11: Reduce Chinook bycatch in west coast commercial fisheries.

Please indicate your support or opposition for this recommendation:

**Strongly support**

12. Draft recommendation 12: Direct the appropriate agencies to work with tribes and NOAA to determine if pinniped predation is a limiting factor for Chinook in Puget Sound and along Washington's outer coast and evaluate potential management actions.

Please indicate your support or opposition for this recommendation:

**Neither support nor oppose**

13. Draft recommendation 13: Support authorization to more effectively manage pinniped predation of salmon in the Columbia River.

Please indicate your support or opposition for this recommendation:

**Neither support nor oppose**

14. Draft recommendation 14: Reduce populations of non-native predatory fish species that prey upon or compete with Chinook.

Please indicate your support or opposition for this recommendation:

Support

15. Draft recommendation 15: Monitor forage fish populations to inform decisions on harvest and management actions that provide for sufficient feedstocks to support increased abundance of Chinook.

Please indicate your support or opposition for this recommendation:

Support

16. Draft recommendation 16: Support the Puget Sound zooplankton sampling program as a Chinook and forage fish management tool.

Please indicate your support or opposition for this recommendation:

Support

## **Goal 2: Decrease disturbance of orcas from vessels and noise and increase orcas' access to prey**

17. Draft recommendation 17: Establish a statewide “go-slow” bubble for small vessels and commercial whale watching vessels within half a nautical mile of orcas.

Please indicate your support or opposition for this recommendation:

Strongly support

18. Draft recommendation 18: Establish a limited-entry whale-watching permit system for commercial whale-watching vessels and commercial kayak groups in the inland waters of Washington to increase acoustic refuge opportunities for the orcas.

Please indicate your support or opposition for this recommendation:

Strongly support

19. Draft recommendation 19: Require an annual “Be Whale Wise” certification for all recreational boaters on the inland marine waters, and ensure that all boaters are educated on how to limit boating impacts to orcas.

Please indicate your support or opposition for this recommendation:

Strongly support

20. Draft recommendation 20: Increase enforcement capacity and fully enforce regulations on small vessels to provide protection to Southern Residents.

Please indicate your support or opposition for this recommendation:

Strongly support

21. Draft recommendation 21: Discourage the use of echo sounders and underwater transducers within one kilometer of orcas.

Please indicate your support or opposition for this recommendation:

Support

22. Draft recommendation 22: Implement shipping noise-reduction initiatives and monitoring programs, coordinating with Canadian and US authorities.

Please indicate your support or opposition for this recommendation:

**Strongly support**

23. Draft recommendation 23: Reduce noise from the Washington State ferries by accelerating the transition to quieter and more fuel-efficient vessels and implementing other strategies to reduce ferry noise when Southern Residents are present.

Please indicate your support or opposition for this recommendation:

**Strongly support**

24. Draft recommendation 24: Reduce the threat of oil spills in Puget Sound to the survival of Southern Residents.

Please indicate your support or opposition for this recommendation:

**Strongly support**

25. Draft recommendation 25: Coordinate with the Navy in 2019 to discuss reduction of noise and disturbance affecting Southern Resident orcas from military exercises and Navy aircraft.

Please indicate your support or opposition for this recommendation:

**Strongly support**

26. Draft recommendation 26: Revise RCW 77.15.740 to increase the buffer to 400 yards behind the orcas.

Please indicate your support or opposition for this recommendation:

**Strongly support**

27. Draft recommendation 27: Determine how permit applications in Washington state that could increase traffic and vessel impacts could be required to explicitly address potential impacts to orcas.

Please indicate your support or opposition for this recommendation:

**Strongly support**

28. Draft recommendation 28: Establish a whale protection zone to reduce disturbance to foraging orcas.

Please indicate your support or opposition for this recommendation:

**Strongly support**

### **Goal 3: Reduce the exposure of Southern Resident orcas and their prey to contaminants**

29. Draft recommendation 29: Accelerate the implementation of the ban on PCBs in state purchased products and make information available online for other purchasers.

Please indicate your support or opposition for this recommendation:

**Support**

30. Draft recommendation 30: Identify, prioritize and take action on chemicals that impact orcas and their prey.

Please indicate your support or opposition for this recommendation:

Support

31. Draft recommendation 31: Reduce stormwater threats and accelerate clean-up of toxics that are harmful to orcas.

Please indicate your support or opposition for this recommendation:

Support

32. Draft recommendation 32: Improve effectiveness, implementation and enforcement of National Pollutant Discharge Elimination System (NPDES) permits to address direct threats to Southern Resident orcas and their prey.

Please indicate your support or opposition for this recommendation:

Support

33. Draft recommendation 33: Increase monitoring of toxics substances in marine waters; create and deploy adaptive management strategies to reduce threats to orcas and their prey.

Please indicate your support or opposition for this recommendation:

Support

#### **Additional draft recommendations**

34. Draft recommendation 34: Provide sustainable funding for implementation of all recommendations.

Please indicate your support or opposition for this recommendation:

Strongly support

35. Draft recommendation 35: Conduct research, science and monitoring to inform decision making, adaptive management and implementation of actions to recover Southern Residents.

Please indicate your support or opposition for this recommendation:

Support

36. Draft recommendation 36: Monitor progress of implementation and identify needed enhancements.

Please indicate your support or opposition for this recommendation:

Support

**37. What are the top 5 things that you think should be done? [As guidance, Friends of San Juans has identified our top 12 priority actions. There is an opportunity to enter more comments on these priorities at the end of the survey.]**

Draft recommendation 1: Significantly increase investment in restoration and acquisition of habitat in areas where Chinook stocks most benefit Southern Resident orcas.

Draft recommendation 2: Immediately fund acquisition and restoration of nearshore habitat to increase the abundance of forage fish for salmon sustenance.

Draft recommendation 3: Enforce laws that protect habitat.

Draft recommendation 4: Immediately strengthen protection of Chinook and forage fish habitat through legislation that amends existing statutes, agency rulemaking, and/or agency policy.

Draft recommendation 17: Establish a statewide “Go-slow” bubble for small vessels and commercial whale watching vessels within half a nautical mile of orcas.

Draft recommendation 18: Establish a limited-entry whale-watching permit system for commercial whale-watching vessels and commercial kayak groups in the inland waters of Washington to increase acoustic refuge opportunities for the orcas.

Draft recommendation 20: Increase enforcement capacity and fully enforce regulations on small vessels to provide protection to Southern Residents.

Draft recommendation 23: Reduce noise from the Washington State ferries by accelerating the transition to quieter and more fuel-efficient vessels and implementing other strategies to reduce ferry noise when Southern Residents are present.

Draft recommendation 24: Reduce the threat of oil spills in Puget Sound to the survival of Southern Residents.

Draft recommendation 25: Coordinate with the Navy in 2019 to discuss reduction of noise and disturbance affecting Southern Resident orcas from military exercises and Navy aircraft.

Draft recommendation 27: Determine how permit applications in Washington state that could increase traffic and vessel impacts could be required to explicitly address potential impacts to orcas.

Draft recommendation 28: Establish a whale protection zone to reduce disturbance to foraging orcas.

**38. Please use this space to share any comments about the draft recommendations. [Here are the comments that Friends will include. Note: we are also using this as an opportunity to list all 12 of the priorities we would like to see included.]**

Protection:

Protection is the most cost efficient, ecologically effective solution. It supports the entire marine ecosystem, has no risk of unintended consequences and is essential to the

success of other strategies such as increased hatchery production. All efforts to improve protection must be implemented.

#### The importance of marine nearshore habitat for Chinook:

For all recommendations, ensure that references to Chinook habitat includes both marine nearshore as well as freshwater habitats.

#### Prevent Oil Spills and Maintain Vessel Noise Reductions:

Reducing noise impacts from vessel traffic is critical to SRKW population growth, and the noise reductions achieved through the Task Force's recommended actions must be maintained. Increases in vessel traffic could reduce or eliminate the noise reductions made through the implementation of Task Force recommendations. Increased vessel traffic could even cause a net increase (from current levels) in vessel noise impacts to the SRKW.

Preventing oil spills is also critical, given that a single major spill could cause SRKW extinction of the whales are in the vicinity of a spill. Draft recommendation 24: Reduce the threat of oil spills... is an essential recommendation that also addresses projected increases in vessel traffic from Canadian-based projects.

These 4 draft recommendations are critical to maintaining vessel noise reductions:

- Draft recommendation 18: Establish a limited-entry whale-watching permit system ...
- Draft recommendation 24: Reduce the threat of oil spills in Puget Sound to the survival of Southern Residents.
- Draft recommendation 25: Coordinate with the Navy in 2019 to discuss reduction of noise and disturbance affecting Southern Resident orcas from military exercises and Navy aircraft.
- Draft recommendation 27: Determine how permit applications in Washington state that could increase traffic and vessel impacts could be required to explicitly address potential impacts to orcas.

#### Removal of the Snake River dams:

Studying the effectiveness of dam removal is not sufficient. In many cases, studies have been completed showing dam removal benefits to Chinook. Bolder steps are needed towards addressing impacts to dam users and implementation of dam removal.

The top 12 draft recommendations:

#### **The top 12 draft recommendations are:**

- Draft recommendation 1: Significantly increase investment in restoration and acquisition of habitat in areas where Chinook stocks most benefit Southern Resident orcas.
- Draft recommendation 2: Immediately fund acquisition and restoration of nearshore habitat to increase the abundance of forage fish for salmon sustenance.
- Draft recommendation 3: Enforce laws that protect habitat.

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