

October 29, 2019

National Marine Fisheries Service
1201 NE Lloyd Blvd., Suite 1100
Portland, OR 97232
ATTN: Protected Resources Division, NOAA-NMFS-2019-0073

Submitted Electronically

RE: PPC Comments on Application of Eligible Entities for Action to Control Sea Lion Predation on Threatened or Endangered Salmonids

The Public Power Council (PPC) is a trade association that represents the interests non-profit, publicly owned utilities that purchase wholesale power and transmission services from the Bonneville Power Administration (BPA). BPA's public power customers are the ultimate funders of extensive mitigation efforts for the impacts of the Federal Columbia River Power System. Approximately one quarter of the wholesale power rates of paid by PPC members to BPA constitute costs related to fish and wildlife mitigation efforts.

We write today to lend our strong support of action intended to reduce or eliminate sea lion predation on the fishery stocks that are listed as threatened or endangered under the Endangered Species Act (ESA) of 1973. Last year PPC and the Columbia River Inter-Tribal Fish Commission (CRITFC) jointly submitted a letter to Congressional leadership in support of passage of the Endangered Salmon Predation Prevention Act of 2018, which facilitates such action.

In the last few decades, west coast sea lion populations have increased exponentially. This growing population has expanded its search for food into the Columbia and Willamette Rivers, river systems these species had never before accessed. NOAA Fisheries has estimated that pinnipeds consumed between 10-45 percent of some stocks of returning adult salmon in 2017. It is difficult to envision a successful recovery plan for fish listed under the ESA without addressing this aggressive predation on the very adult fish that have benefitted from current efforts only to fall short in surviving a return to their spawning grounds.

Pursuant to section 120(f) of the Marine Mammal Protection Act, an eligible entity may request authorization to remove problematic sea lions. A number of State and Tribal organizations ("eligible entities") have requested authorization to remove California sea lions (*Zalophus californianus*) and Steller sea lions (*Eumetopias jubatus*: Eastern stock) that are located in the main stem of the Columbia River between river mile 112 and McNary Dam (river mile 292), or in any tributary to the Columbia River that includes spawning habitat of threatened or endangered salmon or steelhead. The eligible entities action is intended to reduce or eliminate sea lion predation on the fishery stocks that are

listed as threatened or endangered under the ESA.

This drastic predation situation continues to expand supporters of predation control among diverse interests in the public, private and nonprofit sectors. Again, we strongly support the application by the eligible entities and urge its expeditious approval.

Thank you for your consideration of these comments.

Sincerely,

Scott Simms
Executive Director, Public Power Council

CC: Northwest Congressional Delegation