July 14, 2026

Submitted Electronically

RE: Northwest Endangered Salmon Predation Prevention Act of 2026

To Whom It May Concern:

Turtle Island Restoration Network (TIRN) is an active 501(c)3 non-profit organization whose mission is to mobilize people in local communities around the world to protect marine wildlife and the oceans and inland watersheds that sustain them. TIRN has remained a leading force in the protection and recovery of endangered and threatened species, driven by a long-standing commitment to preserving a healthy, blue-green planet for future generations. As an environmental non-profit organization with over three decades of experience, TIRN engages in science-based advocacy, habitat restoration, legal action, and public education to safeguard marine wildlife and their ecosystems. TIRN's work focuses on species like sea turtles, salmon, sharks, and whales, many of which are directly affected by the commercial fishing industry. Through hands-on conservation, policy, grassroots advocacy, and litigation, TIRN works to ensure vulnerable species have a voice.

We are deeply concerned about the proposed bill, Northwest Endangered Salmon Predation Prevention Act of 2026, and the associated efforts to kill pinnipeds. While we actively support meaningful efforts to recover endangered salmon and steelhead, this legislation expands lethal removal of marine mammals without adequately addressing the primary drivers of salmon declines identified by qualified scientists.[1] Rather than focusing on the root causes of declining salmon populations, the bill broadens authority to kill additional pinniped species across a much larger geographic area despite continued scientific uncertainty about the effectiveness of doing so.[2]

[1] NOAA Fisheries. (2017). Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead. National Marine Fisheries Service.
[2] Washington State Academy of Sciences. (2022). Pinniped predation on salmonids in the Washington portions of the Salish Sea and outer coast. Prepared for the Washington Department of Fish and Wildlife. https://wdfw.wa.gov/sites/default/files/2023-01/pinniped-predation-salmonids-washington-portions-salish-sea-and-outer-coast.pdf

One of the bill's most significant changes is replacing the term "sea lion" with "pinniped" throughout Section 120 of the Marine Mammal Protection Act. This seemingly simple change substantially expands the scope of the law by authorizing lethal removal of three distinct species, including harbor seals (*Phoca vitulina*), California sea lions (*Zalophus californianus*), and Steller sea lions (*Eumetopias jubatus*). These species differ in their ecology, behavior, distribution, and population status, yet the bill applies a broad management framework rather than one tailored to each species. Expanding lethal removal authority in this way sets a concerning precedent for future weakening of the Marine Mammal Protection Act.

Pinnipeds are highly intelligent animals with cognitive abilities similar to those of young children,[3] and they are also deeply social, forming strong bonds through behaviors like cuddling, grooming, and even holding flippers. They have been observed comforting one another during stressful moments. When faced with danger, such as being caught in traps, sea lions can become extremely distressed.[4] There is truly no humane way to kill a sea lion. Not only is the killing of pinnipeds incredibly unethical, there is also limited public appetite to make this more common. Public input has overwhelmingly opposed lethal sea lion removals, with fewer than 1% of more than 22,000 comments supporting killings during NMFS's 2020 Bonneville Dam permit process and only 25% of commenters backing pinniped culls in Washington's 2018 Orca Task Force report.[5] [6] Most of the support for this gruesome form of management comes from those who will reap the benefits, including select industries like commercial and recreational fisheries.

Pinnipeds are being blamed for a decline in salmon populations when scientific evidence suggests that they actually consume relatively few salmon. From fall 2019 through spring 2024, the Army Corps of Engineers estimated that sea lions at Bonnelville Dam consumed an average of just 0.28% of adult Chinook attempting to pass the dam in the fall and about 2.7% in the spring, with no accounting for how many of those fish might have died from other causes before spawning. Most of the salmon taken are likely hatchery-origin, since only about 20% of returning Columbia River Chinook are wild fish, meaning sea lions probably consumed only

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[3] Ramos, A., & Winship, K. (2025). Linking Personality and Performance in California Sea Lions (Zalophus californianus) During Computerized Cognitive Enrichment. Animals, 15(20), 3007.
[4] Insley, S., Phillips, A. V., & Charrier, I. (2003). A review of social recognition in pinnipeds. Aquatic Mammals, 29(2), 181-201.
[5] National Marine Fisheries Service. (2020). Response to public comments – NOAA-NMFS-2019-0073: Marine Mammal Protection Act Section 120(f) application for lethal removal of sea lions in the Columbia River Basin (Response to Public Comments – NOAA-NMFS-2019-0073). U.S. Department of Commerce, National Oceanic and Atmospheric Administration. https://www.fisheries.noaa.gov/s3/dam-migration/response_to_public_comments_%E2%80%93_noaa-nmfs-2019-0073.pdf
[6] Pamplin, N., Lee, K., Pearson, S., & Anderson, J. (2021). Pinniped conservation and management update (January 29, 2021) [PDF]. Washington Department of Fish and Wildlife. https://wdfw.wa.gov/sites/default/files/2021-01/7_pinnipedconservationmanagementupdate_jan29_2021_0.pdf

around 0.06% of wild Chinook in the spring and 0.5% in the fall during that period.[7] By removing hatchery fish before they reach spawning grounds, sea lions may even benefit wild salmon populations, because hatchery spawning can reduce the genetic resilience and reproductive success of wild stocks.

The legislation also expands where lethal removals may occur. Existing geographic restrictions within the Columbia River are removed, while new authority is created for lethal removals throughout Washington's rivers, streams, estuaries, bays, Puget Sound, and Pacific coastal waters. This dramatic expansion places substantially more pinnipeds at risk without demonstrating that similar management actions will improve salmon recovery throughout these diverse ecosystems.

The scientific basis for expanding lethal removals is also questionable because important population information remains incomplete. NOAA has not completed updated stock assessments for the Oregon-Washington Coastal or Washington Inland harbor seal stocks since 2013.[8] [9] For the Washington Inland stock, NOAA was unable to calculate a current Potential Biological Removal (PBR) because no current minimum population estimate was available. The available abundance estimates are based on aerial surveys conducted in 1999, and NOAA notes that harbor seals previously experienced severe declines due to Washington's bounty program, during which approximately 17,133 harbor seals were killed between 1943 and 1960.[10] Expanding lethal removals without current stock assessments or updated PBR calculations increases uncertainty regarding potential impacts on local populations and long-term sustainability.

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[7] National Marine Fisheries Service. (2024). Federal Columbia River Power System mitigation actions. U.S. Department of Commerce, National Oceanic and Atmospheric Administration. https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/federal-columbia-river-power-system-mitigation-actions

[8] Carretta, J. V., Forney, K. A., Oleson, E. M., Weller, D. W., Lang, A. R., Baker, J., Hanson, B., Martien, K., Muto, M. M., Orr, A. J., Huber, H. R., Lowry, M. S., Barlow, J., Moore, J. E., Lynch, D., Carswell, L., & Brownell, R. L., Jr. (2013). Harbor seal (Phoca vitulina richardii): Oregon/Washington coastal stock. In U.S. Pacific Marine Mammal Stock Assessments: 2013 (NOAA Technical Memorandum NOAA-TM-NMFS-SWFSC-532). National Marine Fisheries Service. https://media.fisheries.noaa.gov/dam-migration/po2013sehr-owco_508.pdf

[9] Muto, M. M., Orr, A. J., Huber, H. R., Lowry, M. S., Barlow, J., Moore, J. E., Lynch, D., Carswell, L., & Brownell, R. L., Jr. (2013). Harbor seal (Phoca vitulina richardii): Washington inland waters stocks (Hood Canal, Southern Puget Sound, Washington Northern Inland Waters). In U.S. Pacific Marine Mammal Stock Assessments: 2013 (NOAA Technical Memorandum NOAA-TM-NMFS-SWFSC-532). National Marine Fisheries Service. https://media.fisheries.noaa.gov/dam-migration/po2013sehr-wain_508.pdf

[10] Muto, M. M., Orr, A. J., Huber, H. R., Lowry, M. S., Barlow, J., Moore, J. E., Lynch, D., Carswell, L., & Brownell, R. L., Jr. (2013). Harbor seal (Phoca vitulina richardii): Washington inland waters stocks (Hood Canal, Southern Puget Sound, Washington Northern Inland Waters). In U.S. Pacific Marine Mammal Stock Assessments: 2013 (NOAA Technical Memorandum NOAA-TM-NMFS-SWFSC-532). National Marine Fisheries Service. https://media.fisheries.noaa.gov/dam-migration/po2013sehr-wain_508.pdf

Although the bill limits annual removals to 10 percent of the applicable PBR, this safeguard has important limitations. PBR is calculated using entire marine mammal stocks rather than the number of animals occupying Washington waters. For California sea lions, NOAA's 2018 stock assessment reports a coastwide minimum population estimate of 233,515 animals and a PBR of 14,011 animals, but it does not provide a separate abundance estimate for Washington because animals using Washington waters are included within the broader U.S. stock.[11] Lethal removals in Washington could disproportionately affect local aggregations while remaining below a coastwide PBR threshold. Population-wide metrics may not adequately account for localized ecological effects or repeated removals from the same areas. The Eastern Steller sea lion stock was only removed from the Endangered Species Act list in 2013. Washington and Oregon non-pup counts have increased since 1990, though at slower rates.[12] Lethal removals of this species would undermine previous protection efforts under the Endangered Species Act and could impact population sustainability.

Most importantly, the bill does not adequately reflect the scientific consensus regarding why salmon populations have declined. NOAA's *Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead* concludes that the decline of these populations resulted from "losses from hydropower development in the Snake and Columbia River basins, widespread habitat degradation and flow impairment, historical commercial fisheries, and threats posed to the genetic integrity of natural-origin populations by past and current hatchery operations." NOAA further identifies the Federal Columbia River Power System as "a primary threat to the viability" of Snake River spring/summer Chinook salmon and steelhead. The recovery plan identifies numerous limiting factors affecting recovery, including impaired habitat, altered streamflows, fish passage barriers, hydropower system effects, estuary degradation, ocean conditions, hatchery effects, harvest, pathogens, and predation and competition.[13] Predation is only one of many interacting factors affecting recovery.

Pinnipeds have become scapegoats for problems created by human activities. Seals, sea lions, and fish-eating birds often gather in places where humans have created bottlenecks that concentrate fish unnaturally, like at Bonneville Dam. Here, salmon must funnel through fish

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[11] Carretta, J. V., Forney, K. A., Oleson, E. M., Weller, D. W., Lang, A. R., Baker, J., Hanson, B., Martien, K., Muto, M. M., Orr, A. J., Huber, H. R., Lowry, M. S., Barlow, J., Moore, J. E., Lynch, D., Carswell, L., & Brownell, R. L., Jr. (2018). California sea lion (Zalophus californianus): U.S. stock. In U.S. Pacific Marine Mammal Stock Assessments: 2018. National Marine Fisheries Service. https://media.fisheries.noaa.gov/dam-migration/ca_sea_lion_final_2018_sar.pdf

[12] Young, N. C., Muto, M. M., Delean, B. J., Fritz, L. W., Sweeney, K. L., Hastings, K. K., Maniscalco, J. M., & Gelatt, T. S. (2026). Steller sea lion (Eumetopias jubatus): Eastern stock. In Alaska Marine Mammal Stock Assessments, 2024 (NOAA Technical Memorandum NOAA-TM-AFSC-503). National Marine Fisheries Service, Alaska Fisheries Science Center. https://www.fisheries.noaa.gov/s3/2026-05/steller-sea-lion_eastern-stock_v2.pdf

[13] NOAA Fisheries. (2017). Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead. National Marine Fisheries Service.

ladders to reach upstream spawning grounds. We know that man-made dams are the problem driving the salmon decline. At TIRN, we are all too familiar with this struggle.

The Salmon Protection And Watershed Network (SPAWN), a program of TIRN, works to protect endangered coho salmon and their habitat in the Lagunitas Creek watershed through science-based restoration and community education. Through a collaborative effort, one of our major restoration projects removed the highest priority fish barrier in central California, creating and restoring approximately five acres of creek habitat with the construction of 0.25-mile long floodplain corridors along the former San Geronimo golf course property in San Geronimo, California. A significant element of the restoration involved removing a 100-year-old dam, known as Roy's Dam, that was obstructing endangered coho salmon and threatened steelhead trout from migrating to and from spawning and rearing grounds from the Pacific Ocean. The dam was recognized as the federal government's highest priority fish barrier in central California. Since restoration was complete, the project site, now known as Roy's Riffles, is a thriving ecosystem where salmon are free to migrate without any obstructions. Roy's Riffles serves as proof that science-backed restoration works to effectively restore endangered salmon and steelhead populations without endangering the lives of other native species.

Figure 1: Roy's Riffles after restoration.

Hydropower development and operation have contributed significantly to salmon declines by reducing survival, altering river conditions, and creating migration barriers.[14] These altered conditions concentrate migrating salmon at dams and fish passage facilities, creating predictable feeding areas where individual pinnipeds have repeatedly returned and shown consistent predation patterns over multiple years, including at Bonneville Dam in the Columbia River.[15] The current conflict between pinnipeds and salmon is therefore, in part, a consequence of human-altered river systems rather than an indication that pinnipeds are the primary cause of salmon declines.[16]

Independent scientific review supports this conclusion. The Washington State Academy of Sciences concluded that while pinniped predation is a plausible factor affecting salmon abundance, "this evidence does not support a definitive conclusion that pinnipeds are a primary cause of the lack of salmonid population recovery in these ecosystems."[17] NOAA also stated that salmon declines were initially and primarily a result of multiple limiting factors unrelated to predation by pinnipeds.[18] These conclusions emphasize that expanding lethal removal programs is unlikely to achieve meaningful recovery unless the principal threats to salmon populations are also addressed.

The bill also delegates broad implementation authority to the Secretary of Commerce, including determining appropriate methods for lethal removal, issuing permits that may remain effective for up to five years, renewing those permits, and deciding whether lethal removals remain necessary. Although annual reporting and a five-year review are included, lethal removals may continue for years before any determination is made regarding whether the program is achieving measurable conservation benefits.

Recovering salmon requires addressing the factors that science has consistently identified as limiting recovery: habitat degradation, hydropower impacts, impaired fish passage, altered river conditions, and climate-related changes.[19] Predator management may have a role in specific,

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[14] NOAA Fisheries. (2017). Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead. National Marine Fisheries Service.
[15] Stansell, R. J., Gibbons, K. M., & Nagy, W. T. (2010). Evaluation of pinniped predation on adult salmonids and other fish in the Bonneville Dam tailrace, 2008-2010.
[16]Washington State Academy of Sciences. (2022). Pinniped predation on salmonids in the Washington portions of the Salish Sea and outer coast. Prepared for the Washington Department of Fish and Wildlife. https://wdfw.wa.gov/sites/default/files/2023-01/pinniped-predation-salmonids-washington-portions-salish-sea-and-outer-coast.pdf
[17] Washington State Academy of Sciences. (2022). Pinniped predation on salmonids in the Washington portions of the Salish Sea and outer coast. Prepared for the Washington Department of Fish and Wildlife. https://wdfw.wa.gov/sites/default/files/2023-01/pinniped-predation-salmonids-washington-portions-salish-sea-and-outer-coast.pdf
[18] NOAA Fisheries. (2017). Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead. National Marine Fisheries Service.
[19] NOAA Fisheries. (2017). Recovery Plan for Snake River Spring/Summer Chinook Salmon and Snake River Basin Steelhead. National Marine Fisheries Service.

localized circumstances, but it should not become a substitute for addressing these underlying causes. Expanding lethal removal authority without current stock information for some pinniped populations and without stronger evidence that widespread removals will significantly improve salmon recovery risks shifting attention away from the actions most likely to benefit both salmon and healthy marine ecosystems.

By placing blame on pinnipeds, the issue of declining salmon populations will persist. Studies have even shown that dams negatively impact salmon populations, acting as a driving force preventing recovery of endangered salmon populations.[20] Pinnipeds are highly intelligent animals and have been documented exhibiting transgenerational learned behavior at sites like Bonneville Dam.[21] Therefore, killing pinnipeds at these locations will not stop predation because they are learning from each other and actually passing down that knowledge. So, in theory, if you shoot the pinnipeds, it won't help because they are going to keep coming back to feed at the dam because the entire population adapted to this particular behavior in response to a specific resource availability. Removing obstructive dams is the ethical and feasible way to bolster endangered salmon populations.

Killing pinnipeds has not even saved salmon in the past. Since 2008, managers have removed 457 sea lions below Bonneville Dam, killing all of them but 15, yet wild salmon populations have continued to decline.[22] To prioritize salmon recovery, efforts must be shifted to a science-based approach that actually focuses on the primary drivers of decline, including overharvest, habitat degradation, hydropower dams, and hatchery impacts. Until the actual issue is addressed, pinnipeds will continue to return to these areas, creating an ongoing cycle of lethal removals that does not solve the real causes of salmon decline.

Pinnipeds and salmon are only behaving as nature intended while navigating obstacles that humans have created. We can solve these issues without killing pinnipeds by removing the dams that are causing the problem.

We urge you to oppose the Northwest Endangered Salmon Predation Prevention Act of 2026 and instead support science-based salmon recovery strategies that prioritize restoring habitat, improving fish passage, addressing hydropower impacts, and protecting the ecological integrity of both salmon and marine mammal populations.

Thank you for your consideration,

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[20] Levin, P. S., & Tolimieri, N. (2001). Differences in the impacts of dams on the dynamics of salmon populations. Animal Conservation Forum, 4(4), 291–299. https://doi.org/10.1017/S1367943001001342
[21] Keefer, M. L., Stansell, R. J., Tackley, S. C., Nagy, W. T., Gibbons, K. M., Peery, C. A., & Caudill, C. C. (2012). Use of radiotelemetry and direct observations to evaluate sea lion predation on adult Pacific salmonids at Bonneville Dam. Transactions of the American Fisheries Society, 141(5), 1236-1251.
[22] Washington Department of Fish and Wildlife. (n.d.). Columbia River sea lion management: Frequently asked questions. https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/sea-lion-management#faq

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