

TO: Whatcom County Council
FROM: WRIA 1 Environmental Caucus
RE: Support for Flotation Restrictions on South Fork Nooksack River (WCC 11.20.025)
DATE: July 10, 2023

Dear Whatcom County Council,

The WRIA 1 Environmental Caucus would like to express support for the proposed amendment to WCC 11.20.025 that would seasonally restrict flotation of the South Fork Nooksack River. The South Fork's Spring Chinook run, which is a listed population under the Endangered Species Act, is on the brink of extinction and deserves the highest protections. We encourage Whatcom County Council to take this action in accordance with the request of local tribes, Washington Department of Fish & Wildlife, and the WRIA 1 Management Board.

The WRIA 1 Environmental Caucus consists of nonprofit groups and individuals working to restore resilient, self-sustaining waterways that support biodiverse ecosystems and thriving human communities. WRIA 1 is the "Water Resource Inventory Area" that covers the Nooksack River watershed, the Lake Whatcom watershed, and smaller adjoining basins. The E-Caucus is one of several caucuses that participate in the WRIA 1 Planning Unit, which includes representation from diverse stakeholders and governmental entities. The E-Caucus includes representatives from Sierra Club's Mt. Baker Group, RE Sources, Audubon Society, American Rivers, Center for Environmental Law & Policy, and active and retired natural resources, legal, and policy professionals.

The South Fork's Spring Chinook is the largest of all fish in the Nooksack basin and has played an important role in the cultures and economies of the Nooksack and Lummi tribes since time immemorial. Chinook are an important commercial and recreational driver in our region, although the South Fork's wild Chinook population is currently a fraction of what it used to be. Notably, Chinook are also the choice food for the Southern Resident Killer Whales that call the Salish Sea home, and therefore, diminished Chinook numbers contribute to diminished orca numbers.

The fish are already stressed by numerous limiting factors, such as low summer streamflows, excessive water temperatures, and elevated turbidity levels. These watershed impairments are most directly linked to aggressive logging practices, flood control infrastructure (i.e. levies, riprap, etc), and transportation infrastructure. These stressors make it difficult for these fish to migrate to their ancestral spawning grounds and successfully reproduce—thereby leading to diminished numbers of juveniles that make it out to sea.

Spring Chinook run the South Fork earlier than most other anadromous (sea-faring) salmon, arriving in freshwater in late spring and early summer, migrating upstream during the hot summer months, then spawning in late summer and early fall. Importantly, these fish don't feed while in fresh water, which means they have a fixed amount of energy to spend on their difficult migration from the Pacific Ocean into the headwaters of the South Fork.

While the underlying causes of Chinook declines are more related to land uses, adding excessive human interaction to the narrow, warm waters of the South Fork is an additional limiting factor to their survival. It has been estimated that hundreds of tubers float the South Fork on the hottest days of the year, which are the days the fish are most stressed. After their long journey to their ancestral spawning grounds, salmon have limited energy to spend on dodging tubers. In addition, hundreds of tubers walking through shallow riffles where salmon redds (nests) are located harms their reproduction. Additional stress on these fish depletes their energy reserves, thereby limiting their ability to migrate upstream. Metabolic stress is also known to delay the sexual maturation of salmonids, which hinders spawning and reproduction.

Humans can find alternative sites for their recreation; the South Fork Spring Chinook cannot find alternative spawning sites. Whatcom County Council should heed the recommendations of the Nooksack Tribe, Lummi Nation, Washington Department of Fish & Wildlife, and the WRIA 1 Management Board, which collectively are the leading experts in salmon recovery efforts in the Nooksack basin. Please support the common-sense amendments to WCC 11.20.025 to seasonally restrict flotation recreation on the South Fork.

Thank you for your consideration.

– *WRIA 1 Environmental Caucus*