

Submitted via portal at pcouncil.org
Mr. Marc Gorelnik, Chair Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101 Portland, OR 97220
Mr. Barry Thom, Regional Administrator National Marine Fisheries
Service 1201 NE Lloyd Blvd., Suite 1100 Portland, OR 97232

Dear Chair Gorelnik and Council Members, Administrator Thom,
RE: April 2021 Council Meeting, Agenda Item D.6

We were pleased to read that the Pacific Fishery Management Council is considering the needs of the Southern Resident killer whales when setting this year's catch limits, by working with NOAA Fisheries. However, given that this year's pre-season forecast is apparently not below Threshold C, as adopted at the November 2020 Council meeting, there appears to be no additional consideration for these whales this season.

With the welcome births of three new calves in the last six months, it is imperative these new mothers are able to find sufficient resources for themselves and their offspring. In recent years, it is apparent that many females have been struggling to maintain body condition, both during, and post-lactation.

Three mothers of calves from the so-called 2015 baby boom are not alive today, along with 50% of the "boomer" calves, with incidences of mortality in the first 10 years of life increasing in the last decade. Several females documented as pregnant in 2020 lost their calves before, or at birth; unsustainable losses driven by insufficient nutrition.

Hanson MB, Emmons CK, Ford MJ, Everett M, Parsons K, Park LK, et al. (2021) demonstrate these whales' reliance on Chinook year-round, increasingly outside the Salish Sea, with more foraging on the outer coast, especially in proposed Critical Habitat areas 1 and 2, where fishing looks set at previous levels this year.

We appreciate the efforts that went into the ad hoc work group, and the additional management measures offered in years of low Chinook abundance, but these measures likely will come too late to benefit this population who need more food now. Continued salmon fishing in offshore waters risks catching Chinook from one of the nine ESA populations. By reducing these Chinook fisheries, and targeting salmon closer to their final river destination, you will help endangered Chinook recover, and provide benefit to the orcas that depend on them, as well as fishing communities up and down the West Coast.

Given the pre-season estimates for some Chinook stocks south of Cape Falcon are projected below last year's forecast, and California stocks are shown by the cited study to be of importance to these whales, we ask that you consider both these ESA species when setting catch limits this year, and **adopt Alternative II at a minimum**. Thank you.



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