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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 2022 Council Meeting, [Agenda Item D.6](#)

Thank you for the opportunity to comment on 2022 salmon management measures.

It is of great concern that with the addition of only 1 new calf in the Southern Resident killer whale (SRKW) community in the last 12 months, together with two known adult deaths (plus one assumed), the population today stands at 73—the lowest since studies began in 1976.

Several females known to be pregnant over the last two years have not been seen with newborns, and so it remains imperative that sufficient Chinook salmon are available to support healthy pregnancies, as recent fecal studies suggest a 69% pregnancy failure rate when seasonal Chinook abundance is low. Insufficient prey also increases levels of harmful persistent organic pollutants such as PCBs, as has been shown through the work of myself and others, to be continued by Wild Orca in 2022.

We appreciate the efforts that went into the SRKW work group, and the additional management measures offered in years of projected low Chinook abundance, but these measures have yet to be applied and so likely will come too late to benefit this unique population of whales who need more salmon now for their recovery.

In addition, this process concluded in 2020, and so does not take into account the most up-to-date science on the accelerating impacts of climate change on Pacific salmon—both in the high seas, as well as in-river. NOAA Fisheries scientist Laurie Weitkamp recently reported that salmon models are increasingly unpredictable due to the climate crisis. Yet PFMC continues to rely on such models to produce pre-season estimates, often proven to be overestimated. Despite this, PFMC now intends, on NOAA's advice,

to increase the threshold at which Amendment 21 would apply. All this at a time when their own recent publication—*Survival of the Fattest*—indicates that the SRKW are in serious trouble due to insufficient Chinook. Little wonder when a 2021 study by the Nez Perce Tribe (Johnson, Hesse, & Kinzer) determined that Snake River salmon are at the quasi-extinction threshold.

Given that the pre-season estimates for Chinook north of Cape Falcon are projected once again to be above the Amendment 21 threshold, we ask that you adopt Alternative III at a minimum, and introduce additional measures to all west coast fisheries to reduce this year's overall Chinook catch, to increase foraging opportunities available to the SRKW this season.

Thank you.

Dr. Giles, Wild Orca Science and Research Director