



**Northwest Sportfishing
Industry Association**
PO Box 4, Oregon City, OR 97045

PRESIDENT

Dan Parnel
Leisure Sales

VICE PRESIDENT

Fabian Lomas
Holthe Ward Lomas

TREASURER/SECRETARY

Scott Harden

BOARD OF DIRECTORS

Jim Bittle
Willie Boats

Trey Carskadon
BDC Advertising

B.G. Eilertson
Angler's Market

Dave Eng
Frank Amato Publications

Dick Figgins
Dick Nite Spoons

Bob Funk
Shimano Corporation

Dan Grogan
Fisherman's Marine & Outdoor

Steve Grutbo
Kershaw Knives

Ron Hiller
Tom Posey Company

Cheryl Kindwall
Fred Meyer

Jeff Morton
Morton & Associates

Mike Perusse
Don Coffey Company

Buzz Ramsey
Buzz Ramsey Promotions

Bob Rees
NW Guides & Anglers Assn.

Lora Sanchez
Willapa Marine Products

Jerome Sage
Maurice Sporting Goods

Bob Schlecht
Bob's Sporting Goods

Lonnie Schmidt
Farwest Sports

Brad Schoenborn
B.S. Fish Tales

Scott Weedman
Three Rivers Marine & Tackle

EXECUTIVE DIRECTOR

Liz Hamilton

GOVERNMENT AFFAIRS

Carl Burke-Washington
George Okulitch-Oregon

SCIENCE & POLICY ADVISORS

Dr. Doug Dehart

Dan Diggs

Jim Martin

Rod Sando, Chair

Bill Shake

Don Swartz

Maddy Sheehan, Of Counsel

Mr. Will Stelle, Administrator
NOAA Fisheries Service
Northwest Regional Office

Dear Mr. Stelle,

The Northwest Sport Fishing Industry Association (NSIA) appreciates the opportunity to comment on the draft of the final report for "The Effects of Salmon Fisheries on Southern Resident Killer Whales." We commend NOAA Fisheries and Fisheries and Oceans Canada (DFO) for engaging a broad spectrum of scientific reviewers in the three workshops and an independent science team to conduct this review and assess the scientific validity of the your three pronged subject hypothesis stated as follows:

1. Southern Resident Killer Whales (SRKW) are highly dependent on Chinook salmon;
2. The rate of increase of SRKW is higher in years of high abundance of Chinook, and;
3. Reductions in Chinook harvest would lead to an increase in SRKW abundance.

The NSIA believes the following observations and conclusions presented in the report are most salient to eventual decisions NOAA Fisheries and DFO will make regarding effects of fisheries on SRKW.

- The panel found that the evidence for high dependence on Chinook salmon during the summer is convincing. There is also a statistical correlation between periods of lower Chinook abundance and higher SRKW mortality rates. However the panel cautions that this correlation does not imply causation, but rather both could be caused by another environmental factor.
- There are also concerns about whether the index of Chinook abundance accurately reflects the Chinook stocks most important to SRKW. Currently Chinook stocks are harvested at a rate of about 20%, so there is limited potential for increasing Chinook abundance by reducing fishing pressure.
- The panel also found that there are concerns that forgone harvest may not result in proportionally higher Chinook abundance because (1) all Chinook foregone from harvest may not be the stocks that SRKW depend on, (2) all Chinook foregone will not be mature and available to SRKW, and (3) there are many competitors for Chinook salmon, particularly other marine mammals, and they may consume additional Chinook before they are available to SRKW.

Dedicated to the preservation, restoration and enhancement of sport fisheries
and the businesses dependent upon them. Call toll free: 1-866-315-NSIA

- Overall the panel felt that the estimated impact of Chinook catch reductions on SRKW should be regarded as a maximum estimate and that the realized impact would likely be less.
- Little is known regarding winter feeding habits of SRKW which could have significant effects
- Management at a fine scale of reducing harvest in certain locations at certain times on specific population is at this time too complex to be possible.
- The effects of other factors described such as the growth in populations of marine mammals could outweigh any effects of reducing harvest on SRKW populations.

The above conclusions of the independent scientists and the fact that the SRKW population has been increasing through four decades (though not at rates targeted in its recovery plan) indicates to that the SRKW population is not at immediate risk. Furthermore, given the levels of Chinook harvest restrictions we have seen in ocean fisheries over the last two decades, we would question whether additional limitations on Chinook fisheries is biologically sound or necessary as surely they would be implemented at broad scales and impact fisheries on populations that have little to no significance to the SRKW.

Finally NSIA believes NMFS should strongly consider other alternatives raised by the reviewers as possible alternatives to helping increasing the growth and health of SRKW. For example, increasing releases of targeted populations of hatchery Chinook if they can be identified as important to summer or winter time feeding of SRKW and it is consistent with other environmental and ESA recovery objectives.

Again, the NSIA thanks you for the opportunity to review this report and welcomes any further comments you would have for us on our assessment of this important issue.

Sincerely,

Northwest Sportfishing Industry Association



Liz Hamilton,
Executive Director