

GROUNDFISH ADVISORY SUBPANEL REPORT ON SOUTHERN RESIDENT
KILLER WHALE ENDANGERED SPECIES ACT CONSULTATION

Several members of the Groundfish Advisory Subpanel (GAP) were able to sit in on the Salmon Advisory Subpanel's (SAS) briefing of the Southern Resident Killer Whale (SRKW) Endangered Species Act (ESA) consultation provided by Mr. Jeromy Jording, National Marine Fisheries Service, and the GAP offers the following comments.

Through their Risk Assessment ([Agenda Item E.2.a, SRKW Workgroup Report 1, June 2020](#)), the Council's Ad Hoc SRKW Workgroup found weaker statistical relationships between SRKW demography and indices of chinook abundance than those found in previous studies¹. Therefore, the GAP supports the SAS recommendation to adopt Alternative 3.1.1 – No Action – Status Quo Fishery Management Plan implementation ([Agenda Item H.3.a, Supplemental SAS Report 1, September 2020](#)). Selecting an action alternative could cause dramatic economic and social harm to fishermen and communities without measurable benefits to SRKW. GAP members were also surprised to see [proposed SRKW critical habitat areas](#) (which have not yet been finalized in rulemaking) used for time and area closures for non-treaty salmon fisheries in the draft range of alternatives (see Alternatives 3.1.2.e-4 and 3.1.2.e-5.c in [Agenda Item H.3.a, SRKW Workgroup Report 1, September 2020](#)).

PFMC
09/15/20

¹ From Executive Summary (page 9) of the Ad Hoc SRKW Workgroup's Risk Assessment ([Agenda Item E.2.a, SRKW Workgroup Report 1, June 2020](#)):

Similar to previous evaluations of the interaction between salmon fisheries and the SRKW population, the Workgroup examined correlative relationships between SRKW demography and indices of Chinook salmon abundance. In contrast with earlier evaluations, we used a newly developed model of Chinook salmon distribution to quantify Chinook abundance by ocean area and time of year rather than by stock or groups of stocks (Section 5). The resultant statistical relationships were weaker than those found in previous studies, and we were unable to develop a robust model that can predict or characterize these relationships.