

Southern Resident Killer Whale Discussion Paper Feedback Form:

First Nation or Stakeholder Group Name: _____ Marine Conservation Caucus_____

Please provide your feedback in the table below, if there are not enough rows provided please copy and paste more rows in at the end of the table. You are requested to provide feedback in writing using this form **Thursday March 15th, 2018** to Ashley Dobko at Ashley.Dobko@dfo-mpo.gc.ca.

Pacific Marine Conservation Caucus Preface

The MCC has provided comments within the Discussion Paper Feedback Form. However, please note that we provide additional comments and rationale at the end of this document. Also, it is the position of the MCC that an Emergency Order under the Species At Risk Act is necessary to ensure the effective implementation of SRKW recovery measures, including those related to chinook salmon fisheries management.

Recovery measures to support SRKW requires a commitment of at least five years to ensure effectiveness and to adequately evaluate whether adjustments should be made.

Multiple approaches are required

Feedback category:	Please provide your feedback in the column below:
Choose an item. Juan de Fuca Area 121/21	We support the recommendation for a full fin fish closure in this area during from May 1 to September 30.
Choose an item. Juan de Fuca 20-3 and Juan de Fuca Area 20-4	We support the recommendation for a full fin fish closure in this area from May 1 to September 30.
Choose an item. Juan de Fuca 20-1	<p>We do not support the experiment in this region, especially between May and July, and believe it should be fully closed to fin fish</p> <p>The vital importance (availability and accessibility) of spring and early summer Chinook to SRKWs is being dismissed with this proposal to keep fishing open, particularly prior to August. Photogrammetry (Durban et al.) has identified whales in May to be in poorer body condition than in Sept. Aggressive management actions at this time of year to address the collapse of early timed Fraser Chinook, to reduce fisheries related incident mortality of these Chinook, to reduce competition with whales, and to maximise SRKW accessibility to these and other stocks present at this time are warranted and justified. Availability and accessibility must be the paramount management priority.</p>

Juan de Fuca 20-5	<p>We do not support the experiment in this region, especially between May and July, and support a full fin fish closure.</p> <p>Area 20 generally receives the highest retained catch and the highest effort of all areas in DFO’s proposed SRKW feeding areas. Keeping this area open to salmon fishing only undermines the efforts to reduce competition, improve accessibility, and reduce exploitation on early timed Fraser Chinook. DNA results from 2014 suggest early timed Fraser Chinook made up more than 30% of the catch during June. Whale - vessel experiments conducted between May and July when Fraser Chinook abundance is at its lowest and nutritional stress of whales may be at its maximum cannot be justified if the experiments perpetuate the threats contributing to reduced foraging success and survival. Efforts to improve accessibility and availability at this time of year (May –July) should be maximized through full closures of fin fish. Studies can be conducted later in the season after the critical period for both whales and Chinook is past.</p>
Choose an item. Mouth of Fraser Subareas 29-6, 29-7, 29-9, 29-10, 29-12	<p>These closures lie primarily on the flats of the Fraser River estuary, a place where whales do not go. To be effective (i.e. achieve the desired reduction in acoustic and physical disturbance) these closures must extend into sub Areas 29-3 and 29-4.</p>
Choose an item. N. Pender Island Subareas 18-2, 18-4 and 18-9	<p>Support for full fin fish closure in this area from May 1 to September 30.</p>

Rational for full fishing closures within Area 20- 1 and 20-5

Chinook catch within SRKW foraging areas has been increasing since 2010. It is now double what it was a decade ago (Figure 1). Concurrent with this increase in catch, the effort in Area 20 is greater than in any other SRKW foraging / fishing area. As such, Area 20 has the highest catch and the highest relative effort. Within Area 20, Areas 20-1 and 20-5 make up a high proportion of both catch and effort (74% of the catch in 2012-2017). It is highly likely that the areas with the highest proportion of catch and effort are also areas with both high accessibility and availability to SRKW.

If the objective of the foraging closures is to reduce competition and reduce physical and acoustic disturbance to SRKW, Area 20, and its sub areas of 20-1 and 20-5 would rank as a high priority for reducing catch, effort and disturbance. It makes no sense to leave the areas with the highest

competition and disturbance open if the objective is to actually reduce threats within foraging areas.

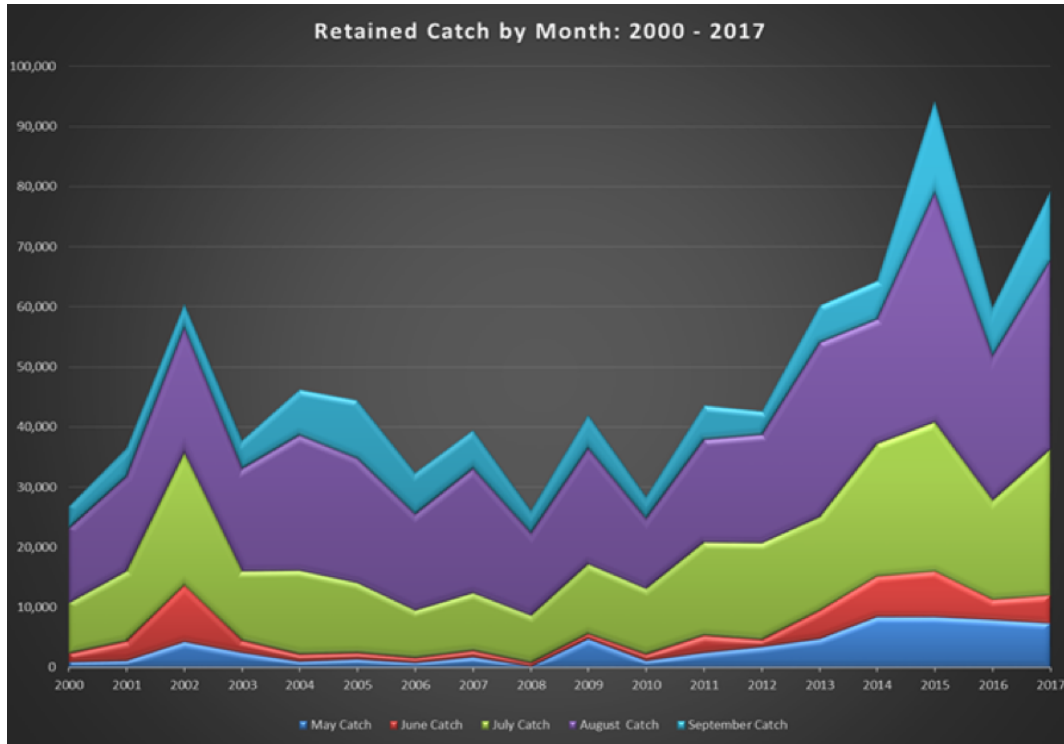


Figure 1. Trends in retained Chinook catch within SRKW feeding refuges of Areas 18, 20, 21, 121, and 29, May to September 2000 – 2017 Source: DFO

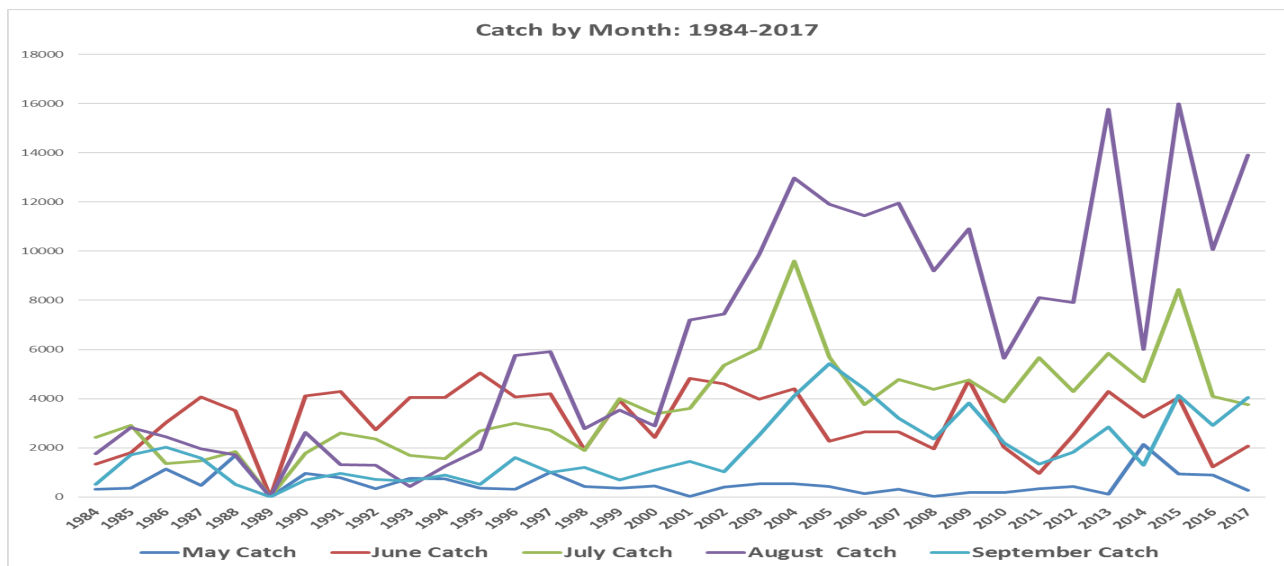


Figure 2. Trends in retained Chinook catch May to September 1984-2017 for Juan de Fuca Area 20 only, Source: DFO

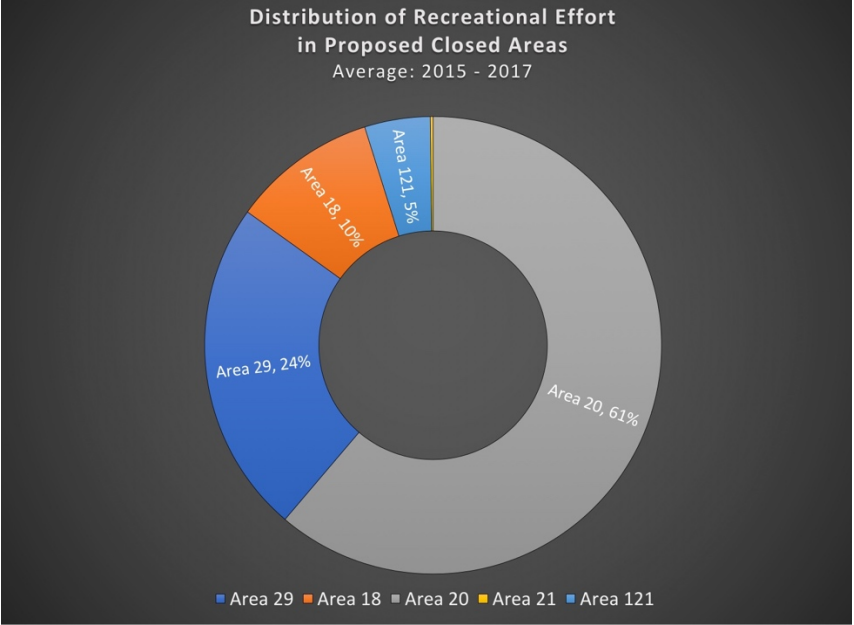


Figure 3. Distribution of recreational fishing effort within SRKW Feeding Areas May to September 2015–2017 (Areas 18, 20, 21, 121, and 29). Data Source: DFO

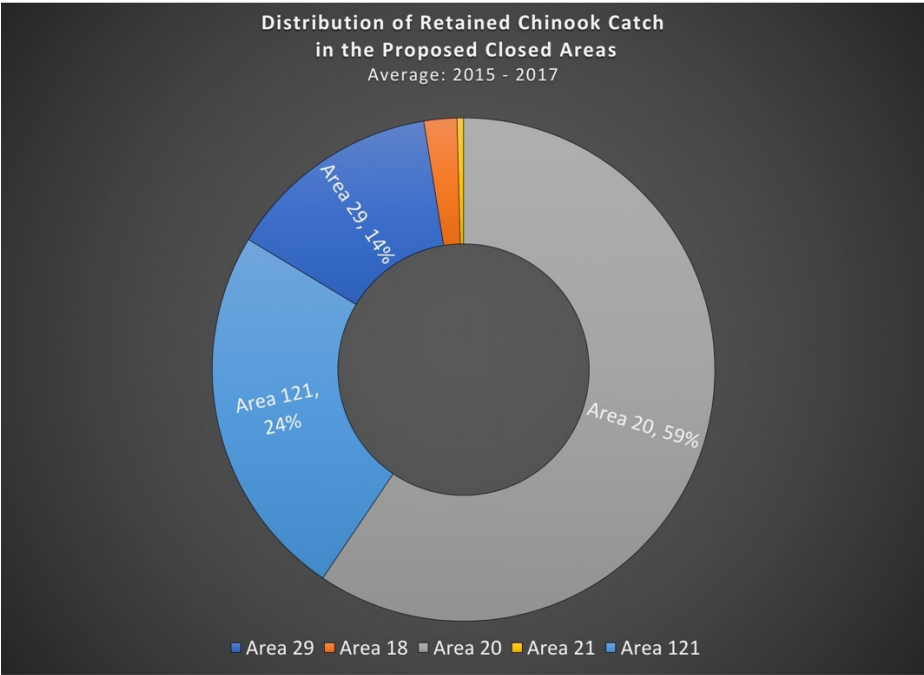


Figure 4. Distribution of the retained Chinook catch within SRKW foraging areas. Catch from Area 20 represents almost 60% of the catch within the foraging areas. Data source: DFO

Other issues not addressed in the SRKW Discussion Paper

A significant reduction in overall mortality of south migrating Chinook salmon is required to increase the abundance of Chinook available to SRKW, and to support the rebuilding of depleted Chinook conservation units. We understand that IHPC discussions include DFO's proposal to reduce Chinook exploitation rates by 25-35%, but these management decisions must be integrated with SRKW recovery objectives. Further, although overall total mortality reductions are welcomed, they are only a step towards reaching the necessary outcome of clear rebuilding objectives for Chinook Conservation Units and evidence that any fishing-related mortality is consistent with these CU level objectives.

There are also significant concerns with the reduction in size-at-maturity for Chinook salmon, especially on south Thompson populations that are important in the diets of SRKW. Current management measures are not adequately addressing this problem. SRKW are not just dependent on chinook salmon, but on large Chinook salmon. Further management measures that address the targeted removals of large fish are necessary to ensure that there are not just a reasonable abundance of Chinook salmon migrating through SRKW habitat, but also larger fish.

Lastly, there is a lack of scientific evidence to suggest that post-release mortality estimates in the Chinook recreational fisheries are adequate. Further, there is a lack of adequate monitoring and enforcement to fully understand the encounter and discard rates and the potential impacts of these release on Chinook mortality.