



August 2, 2021

Ms. Jennifer M. Wallace
Office of Sustainable Fisheries, National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway, 13th Floor
Silver Spring, MD 20910

Re: Amendment 21 to Pacific Coast Salmon Fishery Management Plan; NOAA-NMFS-2021-0006

Dear Ms. Wallace:

PCC Community Markets (PCC) and the National Fisheries Conservation Center (NFCC) are pleased to provide the following comments to NOAA on Amendment 21 to the Pacific Coast Salmon Fishery Management Plan, which include measures to allow for prey availability and foraging opportunities for Southern Resident killer whales (SRKW).

PCC Community Markets is the nation's largest community-owned food market, with over 90,000 active members, 15 stores across the Puget Sound region and over \$300 million in sales. PCC's vision is to inspire and advance the health and well-being of people, their communities, and our planet. It is our mission to ensure that good food nourishes the communities we serve while cultivating vibrant local, organic food systems. Because we are a Pacific Northwest grown co-op and led by our members, sound stewardship of marine and terrestrial food systems is a top priority.

In 2018, concerns about possible Chinook sales impacts on SRKW prompted PCC to enact a preliminary moratorium on Chinook caught in the waters of the Pacific Northwest, and then to seek expert guidance on options to: (1) source Chinook salmon without harming Southern Residents; and (2) advance restoration and resilience in Chinook fisheries. Working with NFCC, a nonprofit thinktank focused on collaborative conservation solutions, to develop a detailed place-based sourcing standard that would accomplish the noted goals, PCC removed its moratorium in the fall of 2020 and released its [PCC Chinook Sourcing Standard](#).

NFCC was founded in 1994. NFCC advises PCC on these matters and also operates the Global Ocean Health program, which addresses the causes and consequences of carbon emissions in fisheries and marine ecosystems.

We would like to thank the Pacific Fishery Management Council (Council) and the member states for developing the measures contained in Amendment 21, and NOAA for their diligence in furthering SRKW recovery.

It is our understanding that the proposed quota restrictions and time/area closures in state and federal waters may constrain non-Indian fisheries. Restrictions would be implemented only if the annual forecasted abundance of Chinook salmon in waters north of Cape Falcon drops below a pre-defined threshold: a mean of the seven lowest-abundance years from 1992-2016. These protective measures would preemptively limit potential for directed ocean salmon fisheries to reduce Chinook salmon prey availability for SRKW. The Council would use the best scientific information available to update the threshold. Based on that understanding, we support approval of Amendment 21 by NOAA. We would also like to offer the following suggestions.

While Amendment 21 is an earnest step in the right direction, we encourage the Council and NOAA to construct a more robust analysis and apply a climate-informed approach in this policy as it evolves in future years. To that end, PCC and NFCC recommend the Council and NOAA:

- Consider setting the threshold for protective measures higher, triggering action before abundance drops below a mean of the lowest recent years, given the mounting evidence that climate-related mortalities and multiple anthropogenic pressures are undercutting many Chinook salmon populations, perhaps more so than fishing. Pollution, habitat degradation, and climate change appear to be eroding reproductive success and Chinook supply for humans, SRKW, and other consumers. Under these conditions, an action threshold based on the mean of the lowest troughs in recent abundance may not be sufficiently precautionary as the productivity of many Chinook stocks has consistently declined.
- Conduct a management strategy evaluation (MSE) to recommend risk-averse Chinook management procedures in the context of rising environmental stresses on Chinook populations. The MSE operating model should include climate-informed projections of natural mortality, provide for fisheries, and account for environmental factors affecting Chinook throughout their life cycle.

Thank you again for the opportunity to comment and for your efforts to consider new way to protect these iconic species.

Sincerely,

Brad Warren
Executive Director
National Fisheries Conservation Center

Aimee Simpson
Director of Advocacy & Product Sustainability
PCC Community Markets