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*Promoting the  
Recreational Boating  
Industry in the  
Pacific Northwest*

June 15, 2012

Assistant Regional Administrator  
Protected Resources Division  
Northwest Regional Office  
National Marine Fisheries Service  
7600 Sand Point Way NE  
Seattle, WA 98115

Thank you for the opportunity to provide comments regarding the May 2, 2012 report "The Effects of Salmon Fisheries on Southern resident Killer Whales". The Northwest Marine Trade Association (NMTA) represents over 700 marine businesses in the recreational boating and fishing industries. Recreational boating and fishing is a \$3.9B activity for Washington state and creates 28,000 jobs annually for the state (Hebert Research, Inc., 2011).

The report suggests that reducing sport and commercial fisheries will provide more fish for killer whales. Since the allowable management catch rate is currently set at only 20% for recreational and commercial fishing, which is much lower than historical levels, a further reduced catch rate for recreational and commercial fishing would provide a relatively insignificant change in food supply for killer whales. Additionally, when considering the scientific view that seal and sea lion populations in the Salish Sea are greater than historic levels, we think this issue needs to be addressed before reducing the recreational and commercial catch rate. In essence, the savings could easily be consumed by these marine mammals.

The report also suggests prime feeding time for killer whales is during the period from late spring through fall, when mature chinook salmon are in greatest abundance. If the view from the science community suggests that there are not ample mature chinook available for killer whales, shouldn't the science community be focusing on enhancement of chinook salmon populations through increased hatchery production, particularly from the Fraser River system which appears to provide the largest contribution of chinook salmon to killer whale predation.

We agree with the scientist's view that the savings outlined in the report by curtailing existing fisheries is over-stated. In our view, again, increased hatchery production is a more positive approach.

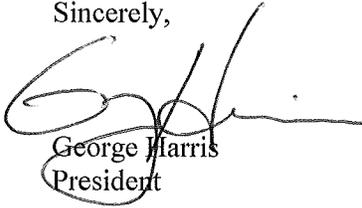
The recreational fishing community has paid dearly for the loss of fishing opportunity since the ESA listing of four stocks of wild Puget Sound chinook in the late 1990's. Today, many of these fisheries have been restored, providing

sport fishing opportunity through mass marking and selective fisheries, targeting on hatchery chinook stocks, identified by their missing adipose fin. Our industry believes enhancement of Puget Sound hatchery chinook stocks, along with Fraser River enhanced chinook stocks is a win-win solution for resident killer whales and the recreational boating and fishing community.

We further agree with the report that winter presence of chinook salmon data is very limited. Additional research to improve the understanding of interaction between killer whales and immature chinook should be sought.

Thank you again for the opportunity to comment.

Sincerely,



George Harris  
President