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**PACIFIC COAST FEDERATION  
of FISHERMEN'S ASSOCIATIONS**



Noah Oppenheim  
*Executive Director*  
Glen H. Spain  
*Northwest Regional Director*  
Vivian Helliwell  
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**In Memoriam:**  
Nathaniel S. Bingham  
Harold C. Christensen  
W.F. "Zeke" Grader, Jr.

**Please Respond to:**

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October 9, 2019

TO: Phil Anderson & Jeromy Jording, co-Chairs  
PFMC/NMFS SRKW Ad Hoc SRKW Workgroup

RE: Comments on the status of the Work Group's risk analysis

Dear co-Chairs Anderson and Jording,

On behalf of the Pacific Coast Federation of Fishermen's Associations, I write this letter as an "on-the-record" contribution to the public participatory component of your work in order to implore the SRKW Ad Hoc Work Group to remain committed to the results of its quantitative analyses and professional and scientific integrity. The Work Group has taken on the important task of evaluating whether there is risk posed to southern resident killer whales by ocean salmon fisheries pursuant to completing reconsultation on the SRKW biological opinion. The statistical analyses that have been conducted to date have been thorough and appear to be based on credible, comprehensive scientific information.

The Work Group must adhere to established scientific approaches and best practices as well as the precedent set in prior similar consultations. It should not abandon quantitative analyses in favor of qualitative approaches, and it must not search for alternative or contraindicative results using "statistical tricks" (in the words of a Work Group member).

Our organization has been monitoring and participating in the Work Group's various meetings and webinars since the process was initiated. The quantitative and statistical approaches used by the group to investigate the relationships between salmon populations and the demographic and health status indicators for the killer whales are clearly based on the best scientific information available and established approaches that are appropriate for this analysis. And these results are conclusive: based on the statistical analyses that have been conducted, the null hypothesis that there is no relationship between salmon populations at any time-area stratum and each of the SRKW demographic and life history indicators cannot be rejected.

However, over the course of the past several months, we have been alarmed by language used by some Work Group members to describe the outcomes of the impartial statistical analyses that have been conducted so far. Work Group members have used phrases including "results we had hoped for" when describing the results of these analyses, terms like the "right" or "wrong" sign when describing the relationships between variables elucidated through regression analyses, and

describing “meaningful” results as only those that would demonstrate a statistical relationship between salmon and killer whale indices.

These phrases indicate the existence of a predecisional bias towards a preferred outcome. It would be wholly inappropriate to devise a “second step” of the Work Group’s analysis that deviates from established scientific practice in order to achieve a qualitative result in alignment with this predecisional bias. It would also be wholly inappropriate to abandon the robust quantitative approaches the Work Group has taken in favor of a “weight of evidence” approach based on qualitative criteria and unverified assumptions or, worse, assumptions that have been contradicted by this very process.

I implore you to maintain the scientific integrity of the risk analysis, to remain committed to conveying the results of these statistical analyses to the Protected Resources Division of NMFS, and to ensuring that the results of this process can be trusted by the fishing communities that our organization represents. To fail to do so would take the results of the Work Group process in an arbitrary and capricious direction, one that could harm our members while failing to provide any meaningful benefit to the southern resident killer whales.

Sincerely,

A handwritten signature in black ink, appearing to read 'Noah Oppenheim', with a stylized flourish extending to the right.

Noah Oppenheim  
Executive Director