



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

MAR 3 2006

Mr. Donald K. Hansen
Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Dear Mr. Hansen,

The Council is scheduled to hear a presentation regarding a Pacific Salmon Commission Report on mass marking and the coded-wire tagging program at the March 2006 Council meeting under Agenda item C.1. NOAA Fisheries would like to take this opportunity to provide comments regarding mass marking and mark selective fisheries and highlight areas of particular concern. Though we address this letter to the Council, the message is applicable to all of the salmon managers involved in shaping the annual salmon fisheries through the Council's preseason planning process.

Recent Federal legislation (Public Law 108-7) mandates marking of all Chinook, coho, and steelhead produced in Federal or Federally funded hatchery facilities that are intended for harvest. Many state funded hatcheries also mass mark the fish they produce for harvest. The most commonly used mass mark is the removal of the adipose fin, which is thought to have little or no impact on survival, yet is readily identifiable. Mass marking serves several purposes. It gives fishery managers a tool to enable mark selective fishing opportunities on harvestable marked hatchery fish in areas where they are intermixed with natural origin fish and unmarked hatchery fish produced for conservation reasons, such as for supplementing naturally spawning populations or seeding restored habitat. NOAA Fisheries has promulgated regulations under section 4(d) of the ESA that uses the presence or absence of an adipose fin as a means to distinguish between listed hatchery fish for which take is prohibited (intact adipose fin) versus those for which take is not prohibited (adipose fin removed). This regulation was promulgated in light of the recent ESA listing of many hatchery fish; it also is designed to accommodate use of mark selective fisheries as a management tool. Additionally, by making hatchery origin fish readily distinguishable from natural origin fish in mixed spawning populations, mass marking facilitates the task of determining and monitoring the status of the natural spawning populations.

The adipose fin is also an essential component of the coast wide coded wire tag (CWT) program. Widespread use of the adipose fin clip for mass marking and the spread of mark selective fisheries have had negative consequences for the CWT program. The CWT program has for many years provided much of the basic data used for stock assessments and fishery management. Even prior to mass marking and mark selective fisheries, the program was deteriorating for a number of reasons, including fewer recoveries due to smaller fisheries and reduced exploitation rates, budget cutbacks affecting fishery and escapement sampling programs, and other problems.

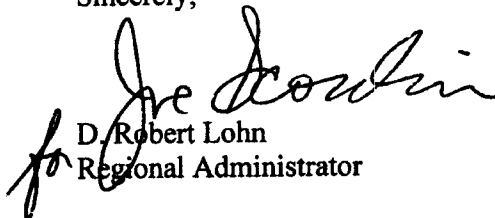


In the past, the adipose fin clip was used solely as the indicator of the presence of a CWT. Now, with mass marking, an adipose fin clipped fish may or may not have a CWT, so tag recovery must rely on electronic detection methods in many fisheries and hatcheries. In addition, the implementation of mark selective fisheries undermines the assumption that CWT marked hatchery fishery can represent the temporal and spatial pattern of mortality of associated natural stocks, particularly when fish are subjected to multiple mark selective fisheries.

NOAA Fisheries welcomes the improved ability to determine the status of listed fish that results from marking hatchery fish, and acknowledges the benefits of mark selective fisheries. However, the degradation of the quality and quantity of the data provided by the coastwide CWT system is a continuing concern because it introduces additional uncertainties in our management systems and our ability to measure the effects of fisheries on ESA listed stocks and other stocks that we manage. Accordingly, NOAA Fisheries believes that fisheries that are implemented in 2006 should employ an appropriately risk-averse approach to management to address these uncertainties. A risk-averse approach is especially pertinent for new mark selective fisheries for Chinook salmon in mixed stock areas, which raise the most complex issues with respect to the viability of the CWT system. New mark selective fisheries should be explicitly coupled with robust monitoring programs that, among other things, focus on the key variables that eventually will spell the success or failure of mark selective fisheries. These variables include the proportion of marked and unmarked fish present in a fishery, the encounter (handling) rate of unmarked fish (both legal and sub-legal size), and estimated mortality rates associated with these encounters. The future success of mark selective fisheries, and even the continued viability of some aspects of the CWT program itself, ultimately may depend on the quality and timely exchange of the information provided by these early monitoring programs.

NOAA Fisheries anticipates that additional, more specific information regarding maintenance of the CWT system by the management agencies will become available prior to the 2007 fisheries, as noted above. Until then, NOAA Fisheries cannot stress strongly enough the importance of all management agencies adhering strictly to the agreed protocols associated with the planning, conduct, monitoring and coordinated analysis of mass marking and mark selective fisheries programs. To do otherwise will contribute to the further degradation of the CWT program, greater uncertainty in fishery and stock assessments and, ultimately, further reductions in fishing opportunities.

Sincerely,


D. Robert Lohn
Regional Administrator