

**Mel Moon (Quileute Tribe) and Joe Gilbertson (Hoh Tribe)  
Comments to PFMC on Monday March 8, 2010 Regarding the  
Proposal for Conducting a Chinook Mark-Selective Fishery in  
Ocean Areas 1-4**

The Quileute and Hoh Tribes are very concerned about the proposal to establish mark-selective fisheries for Chinook in ocean waters. This manner of fishing will only increase the uncertainty that already exists regarding the level of prior interceptions that occurs in the ocean on our stocks. The Pre-season I Report notes conservation concerns exist for coastal spring/summer Chinook. We wish to state for the record that formal written agreements within the Hoh v. Baldrige Management Framework Plan for monitoring and reporting requirements between Washington Department of Fish and Wildlife and tribal co-managers will be required as a precondition to the conduct of mark-selective fisheries in the ocean areas.

We feel prudent management dictates that completion of a multi-year review of the existing ocean mark-selective fisheries for coho should be a prerequisite before expanding this manner of fishing to other species. How much longer do we take on faith that we have the capacity to accurately and correctly assess the impacts from this style of fishing in ocean areas?

We request that the Pacific Council take a precautionary approach towards this manner of fishing. Risk to the resource and the coast-wide Coded Wire Tag (CWT) sampling program should be minimized. We feel these new proposals should acknowledge the intensity level (low or high) the proposed fisheries represent and include the associated assessment program that will be conducted.

Relative to the proposed Chinook mark-selective fishery, given it is the first experiment with this manner of fishing for Chinook in ocean waters, it should not be allowed to exceed the low intensity level as defined by the Scientific and

Statistic Committee and the corresponding assessment program should be designed, at a minimum, to provide the following information:

- the mark rate in the fishery - marked and unmarked encounters will be estimated for legal and sub legal fish by both on-water and shore-based programs;
- the number of fish retained or landed - marked and unmarked fish will be estimated using ashore-based program, including CWT and scale-age sampling;
- the number of unmarked fish released - estimated by shore-based and on-water programs;
- the number of unmarked fish retained - estimated by a shore-based program;
- the number of marked fish released - estimated by a shore-based program in conjunction with on-water mark rate encounter estimates;
- the number of the chinook encounters that are of sub legal size - estimated by shore-based and on-water programs;
- the stock composition of the mortalities – estimated by CWT and DNA
- estimate of the marked and unmarked mortalities of double-index tagged (DIT) and other CWT stocks.

Finally, we request that the Pacific Council conduct a multi-year assessment of the ocean coho mark-selective fisheries similar to that conducted for the Area 5/6 Chinook mark-selective fishery to help inform the Pacific Council and its Advisory Bodies on what to expect from the Chinook fishery being proposed.

Our examination of the Pacific Council's Annual Review of Ocean Salmon Fisheries documents back to 2002 reveals a startling fact regarding the performance of the ocean coho mark-selective fisheries. The projected mark rate for this fishery has consistently been over estimated every year. Consequently, this means there has been a consistent underestimation of the wild fish impact by this fishery in our pre-season planning processes since 2002. It prompts us to wonder what else would be learned from a closer, more thorough examination.