To PFMC Council members,

Well over 10 years ago a new method of salmon harvest known as mark-selective fishing was introduced for ocean and some in-river fisheries along our West Coast. While well intended as a new management technique its implementation and results have been disastrous to our commercial troll Coho salmon fishery. There has been a large effort primarily out of Washington State to convert all ocean fisheries to mark-selective. Unfortunately last year the spring recreational Chinook fishery was converted to mark selective and it would only be logical to assume the commercial Chinook troll fishery will soon be forced to follow suit. This would truly spell the end for the troller. It is not economical to drive around the ocean burning $3-$4 per gallon fuel throwing half of what you catch back overboard searching for the elusive marked Chinook. It amazes me that fish managers would actually think that we could be profitable catching, fighting, and then releasing unmarked 20 lb. Chinook. I do not know one fisherman who could even stand the mental agony of going through this day after day. If this is indeed the type of fishery the council wishes to adopt I would suggest the council also demand that a federal court injunction be filed to curtail ALL other salmon harming activities in order to satisfy the stipulations of the ESA. While our fishing communities have suffered with a 90% decline in salmon harvest since 1975 one would be hard pressed to find another group that has had to bear this type of decline.

Studies have been done several years ago to calculate the discard mortality rate which awarded recreational fishermen a much lower hooking mortality rate and therefore an allocation advantage. There have not been any conclusive multiple-hooking mortality studies to show the effects on mortality of fish having to navigate through several mark-select fishing areas resulting in multiple hook and releases. By the states own data the encountered mark-rate in the ocean has never reached anything near 70%, which should be the low end target to make this type of fishery logical. Implementing this type of fishery has many logistical problems which like most problems are overcome by throwing an increasing amount of money at them, money that the state and federal governments do not have and can’t afford. While hatchery funding is cut and projects for stream and habitat restoration are underfunded millions of dollars a year are funneled to maintaining the mark selective fishery. The irony of it all; as more and more naturally occurring fish from re-habilitated runs make it to the ocean they are killed by mark selective fisheries as discard mortality. Basic high-school math would suggest if you have a fixed amount of hatchery released fish represented by X, and a largely unknown amount of ocean phase surviving natural fish represented by Y, as Y increases, your statistical chances of encountering X gets smaller. Therefore, trying to obtain a quota of X results in killing more Y. What managers struggle with is how much Y is acceptable to kill in order to obtain X, and if the amount of Y is largely out of their control at what point is it counterproductive to sort through and kill Y’s in search of X’s. So why would West coast fishery managers continue down this destructive path with large unknowns and questionable science? The salmon populations have continued to cycle up and down like they have for thousands of years, of course at reduced levels due to factors other than harvest. After over a decade of continual expansion of mark-selective fishing there has been absolutely no scientific proof that this type of fishery has done anything to help recover threatened salmon species.
Scientists and fisheries biologists along with the Pacific Salmon Commission have raised some serious questions about the effectiveness of mark-selective fisheries, and unintended consequences of mass-marking groups of salmon. In August of 2001 in its Review of Salmon Recovery Studies for the Columbia River Basin the Independent Scientific Advisory Board (ISAB) for the Northwest Power and Conservation Council was gravely concerned about the problems of a mass-marked fishery on the Coded Wire Tag program that has been the primary indicator of salmon stock status for more than 3 decades. In a memorandum dated July 29, 2005 the ISAB was increasingly concerned that mortality rates were not fully understood. Some quotes from the ISAB concerning mass-marking and mark-selective fisheries:

“In addition, analytical results increasingly rely upon new assumptions on fishery impacts that are difficult to validate (e.g., assumed values for release and drop off mortality rates, plus mark retention and unmarked recognition error).”

“Despite their “common sense” appeals, mass marking and mark-selective fisheries have not been shown to be an effective management tool to constrain impacts on natural stocks of Chinook and Coho salmon to allowable levels. The effectiveness of mass marking and mark-selective fishing has not been evaluated prior to widespread application, and has instead, been blindly accepted as a matter of faith.”

“Mass marking and mark-selective fisheries increase uncertainty and introduce additional bias in estimates of fishery impacts on unmarked fish due to the necessity to rely upon assumptions (e.g., release mortality rates) that cannot be readily validated.”

“Unfortunately, the selective retention of marked fish violates the fundamental assumption of the coded-wire tag (CWT) program that has been the basis of Chinook and Coho management for the past 25 years. Further, maintaining the viability of the Coded Wire Tag program is a commitment embodied in the Pacific Salmon Treaty.”

“Since the early 1980’s, the CWT system has served as the foundation for Chinook and Coho salmon management in the Pacific Northwest and the scientific basis for the Pacific Salmon Treaty. Concerns over statistical uncertainty, the adequacy of reliance upon hatchery stock surrogates for associated natural stocks, and the impact of mass marking and mark-selective fisheries have been building in recent years. Taken together, these concerns have generated questions regarding the continuing utility of the CWT and associated sampling regimes and analytical tools that the Pacific Salmon Commission has relied upon for decades. As a result, the ability of the CWT system to continue to serve in that capacity is now very much in doubt.”

I believe it is safe to say that both the scientific community and the fishing community have some serious doubts about the effectiveness of mark-selective fisheries on salmon recovery. The mark-selective fishery is a no-win situation for commercial fishermen, their families, coastal communities, businesses and the U. S. tax payers.

Summarizing the fatal flaws in this system:

1. Increasing wild salmon production paid for directly and indirectly by our citizens’ results in more potential mortality of wild fish, in marked selective fisheries. This is counterproductive. The salmon did not spawn; the salmon was not brought to market helping our struggling economy.

2. The actual mortality rates, and spawning viability being suffered by the released
salmon, are largely unknown and based primarily on “blind faith.”

3. Mark-selective commercial troll ocean harvest has never shown a direct correlation in increased salmon returns over the past decade that they have been used.

4. Coded wire tag data used in successfully determining stock status of wild runs has been compromised due to no sample pool of unmarked stock being landed. As more and more of the fishing mortality on natural stocks is accounted for by non-landed catch (e.g., shaker loss, drop off, sea lions, sharks, release and non-retention), the capacity of the CWT system to provide the data necessary for stock and fishery assessments is being increasingly challenged. Double Index Tagging does NOT accurately account for mortality in specific mark-selective fisheries. The level of uncertainty increases as the magnitude of mark-selective fisheries increases.

5. Forcing increased fishing time to land a fixed amount of fish, promoting unsafe working conditions because of more time needed to sort through fish, and causing waste of fuel, a non-renewable energy.

The 2010 season once again proved the total waste and ineffectiveness of using mark selective fisheries as a harvest tool. Tables I-8 and I-9 from the PFMC Review of 2010 ocean salmon fisheries really speak for themselves. The recreational fisheries both North and South of Cape Falcon show on observed mark rate for Coho between 36% and 50%. The recreational Chinook observed mark rate dropped off rapidly as you approached the Columbia River to 58%. Numbers like these are unacceptable. With these numbers a commercial troller would be throwing back 50% of everything they caught. Continually managing a fishery with blind faith in the mark-system, assuming values for release and drop-offs, and accounting for mortality with non-landed catch estimating is nothing more than voodoo science. It was tried it and it didn’t work. It’s time to move on.

I think the general public would be appalled at the time and money that has been plowed into mark-selective fisheries with no results. We still have ESA listed Coho, we still have greatly reduced runs, but we continue with the blinders on. Unfortunately we are now so deep in this thing nobody wants to say STOP! Individuals and private companies are actually making millions operating this fishery. Much like ethanol fuels, bio-diesel mandates, and marine reserves mark-selective fisheries are feel-good legislation that in reality does not work and can have unintended consequences. Mark-selective fishing is wasteful and counterproductive. Salmon conservation and rehabilitation seems to have taken a back seat to pushing the mark-selective fishery regardless of effectiveness. By continuing to approve and mandate mark-selective fisheries the council is taking away millions of dollars that could be used to do some real good, and severely hurting commercial fishing families.

In closing I would like to quote the November 1995 issue of Pacific Fishing magazine article titled Mass Marking. “We’re phasing the troll fishery out,” said (a now former) WDFW employee. “Our only plan is to use selective fisheries in the sport fishery. It’s not all that feasible for the troll fishery.” Sixteen years later, what has been accomplished?

Thank you,
John Alto
F/V Fishtale
Cannon Beach, OR
My name is Tim Klassen and I own Reel Steel Sportfishing in Eureka Ca, an ocean charter business. Salmon are the main fishing attraction for our port. The last several years have been very hard on the local fleet. The 10 day salmon season two years ago demonstrated the pent up demand for salmon fishing. All of the local charters were booked for the full 10 days and could have booked several times over. The local bait shops were sold out and the marinas were full. We need FULL salmon seasons that last from May to September, at least. I understand that there is discussion to raise the escapement on the Klamath River. A higher escapement has not been shown to be necessary to improve returning fish numbers and could have a detrimental effect on our season length. Last year I cancelled 28 trips due to weather. We need longer seasons so that we can reschedule customers. I ask that the Klamath escapement be kept at its current level. Sincerely, Tim Klassen