

**SALMON MANAGEMENT OPTION HEARING SUMMARY**

Date: March 29, 2010 Location: Chateau Westport Westport, WA Attendance: 21 Testifying:	Hearing Officer: Mr. Mark Cedergreen Other Council Members: Mr. Phil Anderson Mr. Dale Myer NMFS: Dr. Peter Dygert Coast Guard: LCDR Brian Chambers, LT Derek Fine, and ENS Joe Miller Salmon Team Member: Mr. Doug Milward Council Staff: Ms. Jennifer Gilden
Organizations Represented:  City of Westport Washington Trollers Association Westport Charterboat Association Willapa Bay Gillnetters	

**Synopsis of Testimony**

Of the 8 people testifying:

- 4 commented primarily on the commercial troll fishery.
- 1 commented on the commercial gillnet fishery.
- 2 commented primarily on the recreational (charterboat) fishery
- 1 commented primarily on community impacts to Westport.

**Special Opening Remarks**

Mr. Doug Milward reviewed options for the commercial and sport salmon seasons.

**Commercial Troll Comments**

- End fin-clipping of salmon due to increased mortality (see attached comments).
- Washington Trollers' Association supports Option 1 with some changes:
  - Since coho are a limiting factor, instead of using the two-thirds in the spring/one-third in the summer harvest ratio, consider a 75%/25% spring/summer break. Need to slow down coho catch rate to maximize Chinook in the summertime. Accept inseason adjustments to keep coho landings low enough to maximize Chinook until August 15.

- For halibut, prefer one for free and one for every two Chinook. Have not been able to harvest halibut for the last two years because there's been no Chinook.
- Appreciate the good line of communication with Doug Milward; "helps us maximize our season" instead of having a stop-and-go season.
- Would like to fish about Ledbetter Point and call in to deliver fish in Ilwaco. There is a precedent for this type of arrangement in Oregon. Also, Washington boats with Oregon licenses should be able to sell in Ilwaco rather than having to sell in Oregon.
- Concerned about the numbers used in salmon management. Would like to see hatch boxes brought back and placed in streams. Concerned about effects of fin-clipping. Need to use GSI to identify where fish are coming from and where they're going.

### **Recreational Comments**

- A 15% exploitation rate on coho is a small number to divide up among so many areas and fisheries.
- Charter operators are cautiously optimistic about public acceptance of Chinook selective fishing and having a high encounter rate on fin-clipped fish.
- Support Option 1 with modifications (see attachment for more details):
  - Selective Chinook-only season opening June 12 should run through Thursday July 1 rather than Wednesday, June 30
  - During all-species portion of the season, liberalize bag limit or the days per week, in-season. Start with one king and one coho, or two coho, and the five-day per week scenario, and then liberalize if and when it becomes clear that there wouldn't be a closure prior to Labor Day.
- If early fishery catches more than guideline, would prefer not to have an interruption before the next fishery begins.

### **Other Comments**

- Willapa Bay gillnetters would like to have a 3,000-Chinook summer (July and August) fishery in Willapa Bay. Gillnetters have lost their market share since they haven't had this fishery in many years.
- The City of Westport supports both the recreational fishermen's recommendations to extend the season and the commercial fishermen's desire to maximize the catch on the most abundant fish. Encourage the Council to be flexible and creative in meeting both of those.

### **Written Statements (Attached)**

- Steve Westrick, Paul Alexander

PFMC  
04/01/10

Council members and staff,

3-29-2010

option 1 Number  
Chinook 110,000  
Coho 110,000

My name is Steve Westrick. I'm the president of the Westport Charterboat Association, thanks for coming to Westport for this public hearing process.

First, I'd like to say we're thankful for the Chinook abundance this year. Last year was great for Coho and now this season, we're looking forward to some great Chinook fishing.

We have a couple concerns however:

First, a fifteen percent exploitation rate on Coho is a very small number to divide up among so many areas and fisheries. We hope there will be enough allocated to the ocean recreational fishery north of Falcon to fully access the Chinook.

Second, we are cautiously optimistic regarding public acceptance of Chinook selective fishing and having a high encounter rate on fin-clipped fish. Our experience with Coho has been a lesser rate than predicted pre-season.

Next items: We are fully aware that selectively fishing for Chinook salmon is a direction we're headed and we support Hatchery Reform which mandates releasing naturally spawning salmon to help rebuild the runs. As long as ample quantities of marked Chinook are produced and available for harvest, it makes economic sense for the recreational communities to support selective Chinook fishing for at least a portion of the season. I know there is much more to Hatchery reform than just numbers of fish produced, but that's a whole another long testimony. At any rate, we are confident this year that our encounter rates (based on 2009 shaker encounters, and fishery projections) that this year we'll have relatively high encounter rates which

would enable a quality fishery. Quality fisheries are hugely important when it comes to public acceptance.

Last year, with the expectation that a greater number of Chinook would be fin-clipped in 2010, we wanted to wait one more year to try the selective for Chinook. So now the time has come and based on the forecast numbers we believe we can have favorable success for this early season pilot program.

You won't be surprised to hear that we support Option One with a few modifications:

First: We would like the selective Chinook-only season, which would open June 12<sup>th</sup>, to run through Thursday, July 1st rather than Wednesday, June 30th. That would fit better with a Sunday through Thursday week during the all-species season that will be following the Chinook only.

Our second modification, which has to do with the all species portion of the season, is to liberalize the bag limit or the days per week, in-season. That being, start with a 1 King 1 Coho, or 2 Coho, and the 5-day per week scenario, and then liberalize if and when it becomes obvious that there wouldn't be a closure prior to Labor Day.

Given the experience of an early closure in 2002 we'd like to be more cautious to start and adjust from there.

Thanks, and I'd be glad to answer questions.

*option 1 has more flexibility than option 2 with respect to the date certain July 29, 7dc*

*We should do it in season this year, unlike last year.*

*... if it becomes obvious early on*

*per  
Wes*

March 29, 2010

**Dear Pacific Fishery Management Council and Salmon Managers,**

Thank you for your time and consideration in regards to the following comments. I would like this letter to be considered in establishing management guidelines for the 2010 and future sport and commercial salmon seasons. I have a long history as a commercial fisherman and have spent considerable time in the sport fishing industry as well. The fishing industry has been a part of my life since my childhood, as I remember hanging out at Chinook Packing as a first-grader back in 1964. I have fished off all four west coast states and spent fifteen seasons in Alaska. I have owned and operated a salmon troller for the past six seasons fishing off Oregon and Washington.

In this letter I have presented four goals for salmon management. (p.1) I have stated five reasons for presenting these goals. (p.2) I have presented support for these five reasons. (p.3-5) I have restated the four goals I propose for salmon management. (p.6) I have written my conclusion showing you why I believe the commercial salmon trollers have been forced to the brink of extinction, and I have suggested another subject for future management discussion. (p.7) References (p.8)

**IT IS MY BELIEF THAT CUTTING FINS OFF OF SALMON AND USING MARKED-SELECTIVE FISHERIES TO HARVEST THEM HAS NOT AND WILL NOT SAVE THE WILD CHINOOK OR COHO. I BELIEVE BOTH PRACTICES ONLY LEAD TO WASTED MONEY, WASTED TIME, AND WASTED RESOURCES.**

I PROPOSE THE FOLLOWING FOUR SALMON MANAGEMENT GOALS  
FOR 2010 AND BEYOND:

- 1. Put an end to all fin clipping and coded-wire tagging of both chinook and coho salmon**
- 2. Put an end to all fin-clipped selective fisheries**
- 3. Make reporting mandatory by species, size, and markings of all hooked or netted fish, regardless of whether you keep them or not**
- 4. Do an in-depth study of the successful recovery rates of wild naturally-spawning fish experienced in the Wenatchee River**

FIVE REASONS FOR PROPOSING THESE GOALS:

**1. Fin clipping a fish immediately scars a fish for life and leaves it without one of the fins for maneuvering throughout its lifespan. It mutilates fish via the use of amputation.**

**2. The use of a fin-clipped selective harvest has led to the needless wastes of tens of thousands, possibly hundreds of thousands of non-fin clipped fish. I do not believe this is an exaggeration.**

Three things to be considered:

- A. Catch ratios between marked and unmarked fish
- B. Mortality rates for released fish
- C. Multiple second and third hook-ups, and predation after releasing wild fish

**3. As wild fish become more prevalent, the chances of both poor catch ratios and hooking mortality are only going to grow more grim.**

**4. Hatchery clipping salmon has not helped in the recovery of wild salmon.**

**5. The number of fin-clipped Chinook verses wild Chinook are abysmally low, and using a marked-select fishery for Chinook will only serve to waste even greater amounts of fish than what the marked-selective Coho fishery wasted.**

SUPPORT FOR THESE FIVE REASONS:

**1. Fin clipping a fish immediately scars a fish for life and leaves it without one of the fins it uses for maneuvering throughout its lifespan. It mutilates a fish through the use of amputation.**

The following quote pretty much sums up why I think cutting a fin off a salmon to manage a fishery should be banned.

“The long-term survival of fin-clipped and unmarked rainbow trout was studied in Castle Lake, California. The results of this study confirmed the generally held belief among fishery workers that fin removal has a serious detrimental effect on fingerling salmonids. Moreover, the relative magnitude of this effect for each of the seven fins that could be removed was determined; viz.: (1) removal of the adipose fin may reduce survival by as much as 50%, (2) removal of a ventral fin may reduce survival by as much as 60 to 70%, (3) removal of a pectoral or dorsal fin may reduce survival by as much as 70 to 80%, and (4) removal of the anal fin may be no worse than removal of the pectoral or dorsal fins, but can have an inconsistent effect.” Nicola, Stephen J. and Cordone, Almo J. *American Fisheries Society Volume 102, Issue 4 (October 1973)*

There are many other published works supporting the fact that clipping any fin leads to higher mortality rates than not clipping fins. There must be better ways to manage a fishery than amputating fish fins. In a very quick search I came upon the following studies by scientist to support this claim:

Hansen, Lars P. 1988. Effects of Carlin tagging and fin clipping on survival of Atlantic salmon (*Salmon salar L.*) released as smolts. *Aquaculture 70(4): 391-394.*

Mears, H. C., and R. W. Hatch. 1976. Overwinter survival of fingerling brook trout with single and multiple fin clips. *Transactions of the American Fisheries Society. 105(6):669-674*

Shetter, D. S. 1967. Effects of jaw tags and fin excision upon the growth, survival, and exploitation of hatchery rainbow trout fingerlings in Michigan. *Transactions of the American Fisheries Society 96(4):394-399.*

Due to the detrimental effects fin-clipping on fingerlings, a valuable resource is being wasted, as well as a tremendous amount of the time and money.

SUPPORT FOR REASONS (continued)

**2. The use of a fin-clipped selective harvest has led to the needless waste of tens of thousands, possibly hundreds of thousands of non-clipped fish. I do not believe this is an exaggeration.**

Three things must be considered here.

- A. Catch ratios between marked and unmarked fish
- B. Mortality rates for released fish
- C. Multiple hookings and predation of released fish

**A. Catch Ratios:** The fishing fleets have not been required to report this data in the past, but many fishermen report numbers that differ greatly from what the state is reporting. At times, I and many other fishermen have had to release as many as eight non-marked fish per one hatchery-marked fish. What this says is that there are a whole lot of unmarked fish out there in comparison to the hatchery-marked fish. This is not uncommon both in the ocean and in the rivers, for both commercial and sport fisheries. To get exact data for this in the future, I think there should be a requirement that all numbers are reported and studied. Past studies do not seem to have enough data to be considered as a healthy control model. With a larger control group and consistent reporting, the fishery departments will have better figures to work with in the future. It is my belief that the catch ratio for non-marked fish verses marked hatchery fish are considerably higher than those being reported. Fin-clipping fish and marked-select fisheries do not serve to preserve wild fish.

**B. Mortality Rates for released fish:** Once again, evidence is not based upon a large, consistent control group. As a harvester, it is disconcerting to be forced by law to release a perfectly harvestable fish, knowing that it is going to die wasted. I have sport and commercially fished for salmon, and in both scenarios I have witnessed what a fish will do to fight its way off the hook. It is my belief that the percentage of mortally wounded fish is much higher than what is actually being reported. When a salmon is hooked deeper than its lips, mortality rates will go up exponentially. Taken with the fact that these fish are fighting for their lives, and it is almost sure death should the hook go beyond the lips or jaw. I have seen the gauntlet these fish must pass to get up to their spawning grounds and frankly, I'm not surprised when I hear the returns are coming in very short of their projections. Fin cutting machines, low water flows, dams, birds and other predators kill tens of millions of smolt, and then they are subjected to a harsh hook and release fishery, where many, many fish are being discarded wastefully.

## SUPPORT FOR REASONS (continued)

### **C. Multiple second and third hook-ups, and predation after releasing wild fish**

The 2<sup>nd</sup> and 3<sup>rd</sup> hooking of non-clipped fish is yet another unaccounted-for reason for higher mortality rates. It is obvious that this type of fishery is killing a lot more wild salmon, than if the government would just let all fishermen harvest the first fish they catch.

Have you ever seen a herd of sea lions rafted together? Their abundance is unbelievable. It is disconcerting to be forced by law to release a perfectly edible fish and know that it is going to die, and even more disheartening to watch predators attacking the fish you release. I quote one sport fisherman in response to the fin-clipped fishery: "That regulation is intended to protect the native fish so they can proceed to their spawning areas, perhaps a good intended rule if it were not for the multitude of seals and sea lions waiting for their lunch. In almost every instance, after carefully releasing the fish, it was immediately taken by a seal or sea lion. --Norm McDonell "The Chinook Observer" A5 (2/24/10)

On many occasions throughout the years, I have had to pick my gear and run for over an hour to get away from pesky sea lions. The loss of fish and fishing gear was staggering. Add to this by throwing back wounded fish, and the sea lions and gulls are loving our rules.

**3. As wild fish become more prevalent, the chances of both poor catch ratios and hooking mortality are only going to grow more grim.** Marked-selective fisheries and fin-cutting will only serve to waste fish, not help them to recover.

**4. Hatchery-clipping salmon has not helped in the recovery of wild salmon.** The clipping of fins and marked-select fisheries have played a huge part in the destruction and waste of untold numbers of fish. **If** the sport and commercial fishermen were allowed to keep the first fish they catch regardless of hatchery markings, **then** I believe the mortality rates upon wild salmon would be much lower than what we are presently experiencing by both fin-clipping fish and instituting marked-selective fisheries. I suggest ending the fin-clipping industry once-and-for-all. It has been a huge strain on the tax payers with no reward to both fish and fishermen.

**5. The percentage of fin-clipped Chinook verses wild Chinook are abysmally low.** I and many of the fishermen I know who targeted chinook salmon in 2009 had a marked rate that was more realistically between ten and twenty percent. This is just one more reason that even proposing any marked-select fishery for either coho or Chinook should be banned for good.

#### FOUR GOALS RESTATED:

It is my belief that hatchery marking and tagging of salmon is a failed policy, and the selective fisheries have done nothing to help in the recovery of wild stocks or the enhancement of more fishing opportunities. I propose the council consider adopting the following four suggestions for the 2010 season and beyond:

1. Continue with the present options, minus the use of a marked-select fishery by either sport or commercial fishermen. Allow fishermen to harvest their first legal-sized fish, regardless of whether they are fin-clipped or not. I think the results will amaze everyone.
2. Completely eliminate the fin-clipping industry and coded-wire tag industry, and return the money into more hatchery production and modern **(GSI) Genetic Stock Indexing** studies.
3. Make it mandatory that both sport and commercial fishermen report every fish they hook: marked, non-marked, and undersized.
4. Do a further study into the success rates experienced on the Wenatchee River and how those successes can be recreated in other rivers. Please consider the following success story: **Biologists Restore Extinct Columbia Fish Stocks: Coho salmon vanished in the Yakima basin in 1985**. I quote: "Twelve adult coho returned past Rock Island Dam near Wenatchee 10 years ago. This year, 19,805 returned past the dam. An increasing number of returns came from natural spawning,(salmon)... which biologists hope will resurrect self-sustaining wild coho stocks in the future. In central Washington's Yakima River basin, coho were **extinct** by 1985. The goal, obviously is to get a lot more wild fish in the future, but the higher numbers definitely mean a successful year" --Shannon Dininny "*Statesman Journal*" 4C (Dec. 31, 2009) *Associated Press*

A big question here: How can biologists now call once extinct runs wild fish? This is a whole topic in itself, which I will briefly touch on at the end of this recommendation.

## CONCLUSION:

In Conclusion, I believe the implementation of fin-clipping for harvesting purposes never planned for the future of the salmon troll industry. I quote a 1995 Pacific Fishing Magazine article: "Others concur that fin-clipping is the only viable way to have a fishery in the future, **but only for sportsmen. We're phasing the troll fishery out.** Our only plan is to use selective fisheries in the sport fishery. It's not all that feasible in the troll fishery." --Lee Blankenship "*Pacific Fishing*" pg. 60, Nov. 1995

Mr. Blankenship is now employed by Northwest Marine Technologies (NMT) as their Director of Biological Services. NMT provides most, if not all services for both coded-wire tags (CWT) and fin-clipping machines and monitors on the West Coast. Something sounds very fishy here, but the pun of it is very frightening considering the dire situation for today's commercial salmon trollers.

I say let's stop wasting untold tens of millions of tax-payer dollars on programs geared for failure, and let's stop the waste of perfectly healthy salmon, a failed experiment. Failure of recovered stocks, Failure of restored fisheries, Failure of promised mitigations, Failure of free enterprise. Put an end to fin-clipping and marked-select fisheries once-and-for-all.

Thank you for all your time.

Sincerely,

Mr. Paul Alexander, Commercial Salmon Troller (WA, OR)

FOR FUTURE MANAGEMENT DISCUSSIONS  
**WILD FISH--I DON'T THINK SO!**

For just a moment consider the BARE facts that nearly every river on the West Coast has been either sluiced by gold miners; scoured by loggings; blasted, concreted, and dammed by power companies; plundered by giant irrigation projects; infiltrated by hatchery stocking over the past 100 years; and over-fished by the masses. Then consider the birds, the seals and sea lions, and non-indigenous fish; and, you could make a very strong case that there really are no wild, old-growth fish left in the Northwest. It is no wonder that I am gravely concerned for my occupation and the future of our industry. Wild Fish! I don't think so. Just a few old fishermen being held captive by the inventions of man.

REFERENCES:

Finley, Carmel 1995. Mass Marking--Curse or Cure for Salmon Management. "*Pacific Fishing*" pg. 60, Nov. 1995

Hansen, Lars P. 1988. Effects of Carlin tagging and fin clipping on survival of Atlantic salmon (*Salmon salar L.*) released as smolts. "*Aquaculture*" 70(4): 391-394.

Mears, H. C., and R. W. Hatch. 1976. Overwinter survival of fingerling brook trout with single and multiple fin clips. "*Transactions of the American Fisheries Society*" 105(6):669-674

McDonell, Norm "*The Chinook Observer*" A5 (Feb. 24, 2010)

Nicola, Stephen J. and Cordone, Almo J. *American Fisheries Society Volume 102, Issue 4 (October 1973)*

Shetter, D. S. 1967. Effects of jaw tags and fin excision upon the growth, survival, and exploitation of hatchery rainbow trout fingerlings in Michigan. "*Transactions of the American Fisheries Society*" 96(4):394-399.