



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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In Reply Refer to:

AFR

DEC 16 2005

Don Kowal
Executive Secretary
Pacific Salmon Commission
600-1155 Robson Street
Vancouver, B.C. V6E 1B5

Dear Mr. Kowal:

The Service appreciates the opportunity to comment on the Pacific Salmon Commission's "Report of the Expert Panel on the Future of the Coded Wire Tag Recovery Program for Pacific Salmon" (Report), and on an earlier draft as part of the scientific peer review process. The Service commends the Pacific Salmon Commission (PSC) for addressing this important bilateral management issue and the Expert Panel for their thoughtful and thorough consideration of the fishery management system, stock assessment program, and related issues.

The Report provides a credible representation of the history, the current situation, and the future prognosis for the coded wire tag (CWT) program. Impacts to the data management system from changing fishery management strategies, ongoing needs to revise and improve stock assessment techniques, and recommendations to address these emerging fishery management framework needs are thoroughly discussed. The Service believes that the findings, recommendations, and implementation steps outlined in the Report are appropriate determinations and a reasonable approach to address the current management situation.

The west coast fishery management community needs to work in partnership to address continuing changes to fishery management strategies and new challenges resulting from the need for stock assessment evaluations at finer and finer scales. In that regard, fishery management and stock assessment techniques should continue and be expanded to: (1) accommodate a wide range of fishery management strategies, including mark selective fisheries or other alternative management strategies, where appropriate; (2) incorporate sampling techniques that are logistically feasible, well coordinated, and, where possible, do not require the sacrifice of individual fish for relevant data collection; and (3) attempt to develop evaluation protocols that integrate the unique benefits of each assessment program characteristic. The Report should serve as the launching point for this endeavor with the progression of the "Implementation Steps" section as the logical pathway to move forward. The PSC is probably the best forum to help direct this



joint U.S./Canada effort, given it's bilateral jurisdiction, which is essential for most west coast Chinook and coho salmon stocks. The Service pledges its continued support in terms of maintaining and expanding its CWT programs if and where necessary, timely reporting of CWT release and recovery information and mass marking plans to regional data exchange centers, participation on key PSC technical committees, and serious examination of new assessment techniques that may compliment and/or replace portions of the current CWT system.

The Service strongly concurs with Recommendation 1, that we need to recommit ourselves to making improvements to the foundation of the existing CWT system, fully recognizing that problems are widespread. The CWT system has been the method of choice for fishery managers for many years, and represents a huge investment in equipment and personnel. It provides vital data for both international and domestic management programs and no major changes in approach are likely to occur in the short term (5-10 years). We should not underestimate the importance of this system and the commitment it will take to address this Recommendation.

Double Index Tagging (DIT) may provide an acceptable technical approach to issues raised by mass marking and mark-selective fisheries. The Service strongly supports Recommendation 7 to refine the DIT concept to provide metrics for better understanding when data beyond a basic CWT indicator stock program should be employed. If DIT proves technically feasible, we must recognize that coast-wide implementation will require additional planning, changes in sampling programs, data reporting, and substantial coordination and implementation costs.

The Service would be very interested in reviewing the design of a "Grand Experiment" referenced in Recommendation 8 and Implementation Step 4 to determine how we might contribute to that effort. The Service is also very interested in examining the potential benefits and costs of the newly emerging Full Parental Genotyping method for use in fisheries management of Pacific salmon fisheries (Recommendation 13). The Service now has its newly constructed genetics laboratory at the Abernathy Fish Technology Center in operational mode, which could process the genetic samples for a pilot study. The Service also believes that an expeditious transition from micro-satellite markers to Single Nucleotide Polymorphism markers makes sense to take advantage of the new technology and to capitalize on opportunities for better data standardization and sample processing cost reduction.

The Service could also investigate the possibility of participating in a coordinated study to determine the relative survival of various fin marks compared to the adipose-fin mark for fish at age two and beyond. This could be done at one or more of our National Fish Hatcheries that rear and release Chinook salmon, and have the ability to conduct otolith thermal marking techniques (Recommendation 10 and Implementation Step 3). Comparisons of fin-clip survival rate work may already have been completed with "results" residing in agency files or gray literature. This information needs to be

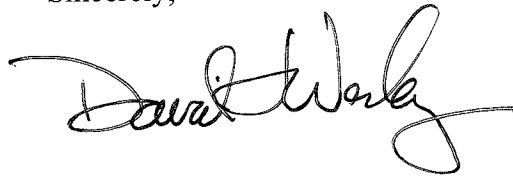
Mr. Don Kowal

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compiled and critically reviewed before launching a new comprehensive study effort. These types of new studies would require additional funding, but the Southern Boundary Restoration and Enhancement Fund (endowment fund) may be an appropriate source of funding.

Again, thank you for the opportunity to comment on the Report and to express our views and reconfirm our commitment towards assisting with future management needs. Please contact Dan Diggs, Assistant Regional Director of Fishery Resources, at (503) 872-2763 if you have questions or would like to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "David Wark". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Acting Regional Director