## RESOURCES AGENCY CALIFORNIA DEPARTMENT FISH & GAME

## DEPARTMENT OF FISH AND GAME

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December 9, 2005

Mr. Larry Rutter, Chair Pacific Salmon Commission 600 - 1155 Robson Street Vancouver, B.C. Canada V6E 1B5

Re: California Department of Fish & Game Comments: Coded Wire Tag Program Review - Final Report of the Expert Panel

Dear Mr. Rutter;

The Department has reviewed the Final Report of the Expert Panel regarding the ability of the coast wide Coded-Wire Tag (CWT) program to continue to provide statistically reliable data to support fishery management decisions and salmon stock assessment programs.

We feel the final report describes many of the Department's concerns regarding the future of the coast wide CWT program. Many of the current problems with marked selective fisheries are specific to Coho fisheries. California is currently operating ocean salmon fisheries as non retention of Coho to conserve our listed stocks. However, the expansion of mark selective fisheries to mixed stock ocean Chinook fisheries would continue to degrade the usefulness of the CWT in fisheries management. The description of emerging technologies to augment or replace the CWT program is a valuable reference.

Fishery managers in California are concerned about the reliance on electronic sampling in Oregon and Washington where the detection of half tags is unreliable. California hatcheries released 8.4 million half tags from 1999 through 2002 broods. Half tags are also used for marking out migrant natural fish such as Sacramento River Spring Chinook for the purpose of cohort reconstruction and the estimation of fishery impacts by time and area. If the northern fisheries monitoring programs are unable to detect these small tags, then their impacts on this stock will be underestimated as well as the ocean wide abundance. This will limit our ability to protect this ESA-listed fish as well as other stocks of special concern to California from ocean fisheries.

California agrees with the final report authors that if mark selective fisheries for Chinook salmon are allowed in ocean mixed stock fisheries, then the use of CWT recoveries for the evaluation of fishery impacts on natural stocks will be less reliable. This will be especially true for the management of Klamath Fall Chinook where the conservation

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funding for implementation of tasks identified in the plan. In addition, this plan will establish a formal framework for agency coordination on the prevention, eradication and management of aquatic invasive species.

Thank you for your consideration. Please direct any questions regarding this request to Susan Ellis, the Statewide Invasive Species Coordinator, at (916) 653-8983, or by e-mail at <a href="mailto:sellis@dfg.ca.gov">sellis@dfg.ca.gov</a>.

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Sincerely,

L. Ryan Broddrick

Director