From: Irene Martin Sent: Thu 7/5/2007 6:47 PM To: Dukes, Joan Subject: Selective gear development proposal

P.O. Box 83,

Skamokawa, Wa. 98647,

July 5, 2007.

Joan Dukes, Council Member,

Northwest Power and Conservation Council,

851 S.W. Sixth Ave., Ste. 1100,

Portland, Ore. 97204-1348.

Dear Joan,

I reviewed the proposal number 2002557000, "What is old is new again," regarding selective gear development on the Columbia River, on the advice of a friend who had noticed my name used in the application. And indeed, on p. 10 of the Narrative portion of the proposal, my name is used: "At least two prominent commercial fishers and business owners in the lower Columbia advocate testing this gear again; Mr. Steve Fick and Ms. Irene Martin."

I am sorry to have to inform you that permission to use my name in this application was never requested. Further I have met only one of the staff members listed, briefly, in two meetings, and have never discussed selective gear with him. I am acquainted to some degree with the two contract fishers, who have also not discussed this grant with me. I have never seen a copy of this grant proposal before now, nor was any contact made with me regarding it before its submission to the Northwest Power and Conservation Council. I have no idea why the proposal writers included my name in this, especially as I do not actually have a commercial fishing license for the Columbia River. My husband is a licensed gillnetter, but I am not. I am a writer who specializes in fisheries and history of the Columbia River, but none of my relevant publications are cited or included in the bibliography. (List appended). With my husband I worked on an experimental shad trap for the Columbia River in the mid 1980s, but our report on that subject is not included in the bibliography.

In the proposal on page 10 the writers refer to "discussions in Astoria in 2005." I have no recollection of any such conversations that I might have participated in. They also state their intention to work with the Commercial Fisheries Advisory Group. As it happens, I am a member of that group, and this proposal has never been brought up and discussed with the fisheries advisors present at any of their meetings. Nor, to my knowledge, has it been brought up in any local public forums, nor discussed with relevant fisheries organizations.

I note that the ISRP committee that critiqued the proposal identified its weakness as "lack of detail on how using the gear would be accepted by commercial, tribal and recreational fishers...fishing community should be involved." I concur. There is one letter of endorsement, from one of the participants, Blair Peterson, whose main purpose in pursuing the idea of a trap seems to be that it will allow the fish and wildlife agencies to develop better data regarding run sizes and that it should be developed as a research tool. The applicants, however, state in a number of places that they are developing the gear as a harvest method. "Meeting this goal requires that we develop suitable gears in cooperation with the fishermen, and change fish management policies and laws."(p. 4)

There is no letter of endorsement from any other fisherman or fisheries organization. There has been no contact with the fishing fleet through any of their associations or news media or through the CAG. I am incredulous that such a proposal, which has the potential to completely change Columbia River fisheries, has not been discussed with the people most affected, the fishermen. I do not believe that hiring of a rural sociologist, as suggested by the ISRP committee, will overcome the damage done by not involving fishermen from the start or informing them of what the proposal plans to do.

I am not necessarily opposed to testing of alternative gear. But I am very much opposed to forcing it on fishermen without their knowledge or consent, and without even discussing the possible far-reaching implications, including changing "fish management policies and laws"(p. 4) and establishing "cooperative fisheries, a concept that could run counter to the individualism of gill net fishers," p. 5. It is not apparent from the application that the applicants even realize how serious some of these far-reaching implications are for the people and communities affected. They seem to have little idea about how to assess the economic success of gear, but that is what will make or break it with fishermen. There is also no plan on how to effectively disseminate the results of the research to fishermen, except that reports will be available on two websites and they hope to work with the CAG, although they have not yet done so.

Their application would have benefited greatly from fishermen input. There are serious errors of fact that any fisherman on the river could have corrected. One example, in the narrative on p. 11, "Fishwheels were popular traditional gear in the lower mainstem Columbia River." Fishwheels were not used historically in the lower mainstem. Craig and Hacker, a source they quote, report them as being operated above Portland and Celilo falls (p. 175). They require swift water to operate, and a narrow channel that fish pass through on their way upstream, in order to be successful. "Such sites were not available in the wide, slowly moving lower portion of the river," Craig and Hacker, p. 175. Fishwheels were owned almost entirely by processors in the Columbia Gorge area up to the Dalles, with a few being individually owned.

Another area of concern is the conjecture that the reason Willapa fishers did not embrace the tangle net for coho was "the fishing community was unwilling to adopt the new gear and fishing requirements." In fact, prices for coho were very low at the time, and would not have justified investing in a tangle net and live box. Spring chinook, on the other hand, have a very high dollar value and profit margin, which yields a satisfactory return on investment, which the applicants do appear to be aware of and which they credit for inducing Columbia gillnetters to use the tangle net. However, they make the astonishing statement that "a less obvious difference may be

that Columbia River gillnet fishers were unable to fish for spring Chinook for twenty years, and so they were more willing to modify how they fished." There is no twenty year span in which Columbia River gillnetters have not fished for spring chinook, which can be verified by looking at fish catch statistics for the last 70 years. The applicants do not seem to have recognized that fishers must figure out what their return per dollar invested will be before switching to an alternative form of gear. The issue is not whether the gear can catch fish, but whether the fishers can make any money doing it.

There are many errors of fact in this proposal. In terms of history I note that the source Craig and Hacker is cited to support the notion that gillnets provided 20% in the way of catch between 1927-1934. Actually, if one looks at the table on p. 170, one will find that they provided 58.7% of the total catch. Traps provided 21.1%, and seines 15.3%. Fishwheels took 1.7% of the chinook catch, 1.2% of the steelhead catch, 15.7% of the blueback catch, and an "insignificant amount of the chum and silver salmon catch," p. 176. Dip nets and setnets took a small percentage of the catch. If one examines the numbers of fish caught in the haul seines and traps as noted by Craig and Hacker, these statistics indicate that by far the largest percentages of the catch were chinook and steelhead, with coho trailing steelhead in the traps, and caught in insignificant numbers in the seines. Since the authors use this source as almost their sole source of information on the historical fisheries and gear types, some analysis of these statistics should have been performed.

There are also some serious omissions in the proposal. While aware that there are pinnipeds in the river, the authors should have realized that marine mammals were considered problems in the heyday of the gears proposed, when lethal take was permitted. The oral tradition contains information on this subject. A serious omission is the effect of invasive aquatic weeds on gear such as a pound net. My husband and I worked on developing a shad trap on the river back in the mid 1980s. Curiously, our study is not cited in the bibliography, and there are numerous other sources on experiments that have been done with alternative gear that are not cited either. One of the most significant hindrances then in development of a trap, aside from marine mammal predation, was the blanket effect the accumulation of aquatic plants such as Eurasian milfoil had on the gear, choking it and rendering it virtually useless in a couple of tides. The aquatic weed situation on the lower Columbia is far more serious now. Its omission in the proposal is inexplicable.

Another serious omission is the warm water temperature regime in the Columbia River in the fall. Part of the reason that the spring chinook tangle net/live box combination works well for spring chinook is the cool water temperatures prevalent at the time of capture. The fall situation is quite different. I noticed nothing in the application that assessed this problem, or proposed any way to deal with it.

In conclusion, I reiterate that I was not consulted, informed or involved in any way in the development of this application. Due to the lack of communication by the applicants with the fishing fleet, the numerous errors of fact, lack of comprehension of river conditions that will affect performance of this gear, and lack of analysis of potentially serious social issues should the gear succeed, I cannot endorse this application. I would appreciate it if my name were removed from the body of the text. Thank you.

Sincerely,

Irene Martin

List of relevant publications

Development of an Alternative Gear for Harvesting Columbia River Shad, Final Report, 1987-88. Prepared under a grant from the National Coastal Resources Research and Development Institute, Newport, Oregon.

Work is Our Joy, the Story of the Columbia River Gillnetter. Oregon Sea Grant and the Columbia River Maritime Museum, 1989. Video.

Legacy and Testament, the Story of Columbia River Gillnetters (Pullman, Washington State University Press, 1994)

The Beach of Heaven, a History of Wahkiakum County (Pullman, Washington State University Press, 1997)

A Social Snapshot of the Columbia River Gillnet Fishery. (Astoria, Salmon for All, 2005).