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August 1, 2019

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Dr SE
Salem, OR 97302

Re: Support of Permanent Rule to make the use of barbless hooks voluntary

Honorable Fish and Wildlife Commissioners,

The Northwest Sportfishing Industry Association appreciates this opportunity to express our support for the permanent rule to make voluntary the use of barbless hooks while fishing in the Columbia River basin. The NSIA represents nearly 300 businesses dependent on healthy fishery resources and meaningful sport fishing opportunity. NSIA's businesses are the infrastructure for the nearly 400,000 Oregon and Washington anglers who purchase an additional tag to fish for salmon and steelhead in the Columbia River Basin.

Wherever conservation and economics have dictated, NSIA has led the charge for selective sport fisheries for the live release and eventual spawning of wild salmon and steelhead. Since our inception in 1993 mark-selective fisheries have been the **number one goal** of the association. We worked in Congress for funding of mass marking trailers, worked with Canadians, Tribes, the states of WA, OR, ID, CA and in the courtroom to make the marking of hatchery fish a reality. What currently is seen as a no brainer to mark hatchery fish has been a long effort to realize and utilize in fishery management. Without mass marking, the sport fishing industry would be a shadow of what it is today.

As supporters of selective sport fisheries, we are mindful of the release mortalities that are associated with our fisheries. Today, more than ever Endangered Species Act management is the limiting factor regardless of healthy wild and hatchery stock abundance, so limiting mortalities expands our opportunities to access abundant stocks. **The very low sport-caught release mortalities also allow for four times as many hatchery fish to be accessed as compared to large mesh gillnets (10% vs 40%) and half again as many hatchery fish as small mesh gillnets (10% vs 14.7%).**

In a review of the existing studies on catch and release it has been repeatedly demonstrated that it is the location of the hook, not the size, barbed or barbless, or treble hook that contributes to higher mortality rates. Hooks deeper in the mouth/throat tend to have a much higher mortality rate than hooks that are in the jaw area where most fish (more than 80%) tend to be hooked. There are numerous studies that support the very low release mortalities. I've attached information from two, one done on the Willamette River in Oregon and one in Washington.

The Oregon Fish and Wildlife Commission rescinded barbless hook rules in 1997 during an effort to simplify rules and following assessment of gear restrictions. It was determined, barbed or barbless was not a real biological issue but is often mandated by **social or political pressures**. It is our opinion that this rule was put in place

without scientific justification, and this was affirmed when the Technical Advisory Commission declined to allow any conservation credit for the rule.

It is acknowledged that salmonids are more fragile while still in saltwater than in freshwater. The Pacific Fishery Management Council has set the release mortality for sport caught coho at 14% with an additional 5% “drop off” rate. In river, the mortality set by the Columbia River Technical Advisory Committee is 10%. We concur that barbless hooks make sense where you have a saltwater fishery where there is more stress mortality at release than in freshwater, more juvenile fish (shakers) actively feeding, a high proportion of fish to be released, and a high catch rate so if a fish is lost due to gear more are likely to be caught in a day’s fishing. Ocean fishing vessels tend to be larger boats with higher sides, making in-water release (a best practice in freshwater) nearly impossible.

In the Columbia River, hatchery spring chinook comprise 75 to 80 percent of the return. The catch per unit effort, number of angler days per kept fish, is nearly nine days per fish! Making salmon fishermen use barbless hooks and possibly lose a fish after nine days of fishing for no demonstrable conservation benefit, does not make sense.

Both ODFW and WDFW have a relationship issues with their stakeholders. Anglers pay more and more with the perception they are receiving less and less. We do not need regulations that dampens enthusiasm, especially for new and/or casual anglers, thus reducing current market activity and future market potential, and discourages angler tourism because of the perception of reduced success potential.

Obviously, there is one apparent benefit to barbless hooks and that is to assuage the feelings of some whose perception is one of fairness and conservation but unfounded in empirical evidence. We respect that view and support their choice to crimp their barbs and, of course, purchase barbless hooks in preparation for a day fishing in the Columbia Basin.

We very much appreciate the course correction, here, and know that our mutual customers will as well. Thank you again for the opportunity to participate in this discussion.

Liz Hamilton, Executive Director
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Hooking Mortality by Anatomical Location and Its Use in Estimating Mortality of Spring Chinook Salmon Caught and Released in a River Sport Fishery

[Robert B. Lindsay](#), [R. Kirk Schroeder](#), [Kenneth R. Kenaston](#), [Robert N. Toman](#) & [Mary A. Buckman](#)

Pages 367-378 | Received 03 Sep 2002, Accepted 23 May 2003, Published online: 09 Jan 2011

Abstract

We estimated the hooking mortality of spring Chinook salmon *Oncorhynchus tshawytscha* that were caught and released to determine whether selective fishing on hatchery Chinook salmon would reduce harvest mortality of wild fish in a sport fishery in the lower Willamette River, Oregon. Hooking mortality in the fishery was estimated from hooking mortality rates for each of five anatomical locations (jaw, 2.3%; tongue, 17.8%; eye, 0.0%; gills, 81.6%; and esophagus–stomach, 67.3%) and from the frequency of these anatomical locations in the sport fishery (jaw, 81.5%; tongue, 5.1%; eye, 0.4%; gills, 5.1%; and esophagus–stomach, 7.8%). Mortality rates by anatomical location were estimated from recaptures of 869 tagged fish that were experimentally angled and of 825 tagged controls that were trapped in a nearby fishway. Anatomical hook locations in the lower Willamette River sport fishery were determined with creel surveys. We estimated hooking mortality rates of 12.2% for wild Chinook salmon caught and released in the sport fishery and 3.2% for the entire run of wild Chinook salmon based on a mean encounter rate of 26%. Hook location was the primary factor affecting recapture of hooked fish, but fish length, gear type, bleeding, and the elapsed time to unhook fish were also significant factors. A selective sport fishery in the lower Willamette River can be used to reduce harvest mortality on runs of wild Chinook salmon while maintaining fishing opportunity on hatchery Chinook salmon. The effect of selective fisheries for Chinook salmon in other rivers would depend on the frequency distribution of anatomical hook locations and on river-specific encounter rates.

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Excerpt from: **A methodology for estimating the adult wild winter steelhead sportfishing mortality in the lower Columbia river, by Dan Rawding, Washington Department of Fish and Wildlife.**

Table 1. Winter steelhead hooking mortality from Hooton, 1987 and WDFW unpublished data.

Location	SampleMortality		Purpose	Reference
	Size	Rate		
Cowichian R.	509	3.1%	Broodstock	Hooton 1987
Englishman R.	240	3.8%	Broodstock	Hooton 1987
Heber R.	70	4.3%	Broodstock	Hooton 1987
Gold R.	30	0.0%	Broodstock	Hooton 1987
Naniamo R.	378	1.9%	Broodstock	Hooton 1987
Puntledge R.	481	1.9%	Broodstock	Hooton 1987
Salmon R.	464	5.8%	Broodstock	Hooton 1987
San Juan R.	49	6.1%	Broodstock	Hooton 1987
Somass R.	1174	3.7%	Broodstock	Hooton 1987
Tsitika R.	320	3.1%	Broodstock	Hooton 1987
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Vancouver Is.	3715	3.4%	Broodstock	Hooton 1987
Keogh R.	336	5.1%	Hooking	Hooton 1987
Vancouver Is.			Mortality	
Toutle R.	112	1.8%	Broodstock	WDFW 1989
SW Washington				Unpublished data