



# American Fisheries Society

## *Western Division*

President Scott Bonar, President-elect Leanne Roulson, Vice-president Lori Martin, Secretary-Treasurer Dave Ward, Past-president Eric Wagner

Senator Fran Pavley, Chair  
Senate Natural Resources and Water  
State Capitol, Room 4035  
Sacramento, CA 95814

Received  
MARCH 31, 2011

**RE: Support for SB 670 by the Western Division of the American Fisheries Society**

Dear Senator Pavley:

The Western Division of the American Fisheries Society strongly supports SB 670, which would suspend instream suction dredge mining until a rigorous scientific assessment of the practice's cumulative impacts on fish is prepared and new regulations are written based on that assessment.

The California Department of Fish and Game (CDFG) has acknowledged in court that this mining practice may be harming the spawning success of several fish species, including coho and chinook salmon, which are federally listed as endangered. Current law only authorizes CDFG to issue suction dredge permits after it has determined the practice will NOT be deleterious to fish. Yet the CDFG has NOT limited this recreational activity while it reviews the effects of the practice. At a minimum, it will take the Department two more years of study before its review is completed and rules can be updated to protect fish. That is two more years of increased risk for already endangered salmon populations.

Admittedly, quantifying the environmental impacts of suction dredging is difficult to accomplish and the research results to date have been inconclusive (e.g., Harvey 1986; Harvey and Lisle 1998). However, Harvey and Lisle (1999) more recently documented a negative effect of dredging on salmon spawning success. Fish mortality may result from direct destruction of eggs or fry from the mining, or from the indirect effects of fish spawning in unstable habitats created or altered by dredging. Although the effects of suction dredging may be minor in some settings compared with the direct effects of fishing, the potential cumulative effects of dredging on listed fish populations are significant. For example, current regulations do not provide a means to regulate the number of suction dredge operation in a particular river reach. Such cumulative effects may increase as the numbers of unemployed miners continue to increase in the current recession.

Last year, all salmon fishing was banned along the Pacific coast of California and southern Oregon. The ban is expected again this year. These bans and the greatly reduced salmon populations that preceded them are negatively affecting the livelihoods of thousands of commercial fishermen, fish processors, and charter boat operators. In addition, scientific fish

collecting permits are highly restricted to protect listed salmon. It seems irrational to restrict scientific research, jeopardize an entire fishery, ban commercial fishing, and increase risk to listed fish while allowing a recreational hobby.

This is a classic case of why CDFG would be wise to use the precautionary principle to guide decisions. That is, to err on the side of the fish before they are forever extirpated.

Sincerely yours,

Eric Wagner, Past-President

#### References

Harvey, B. C. 1986. Effects of suction gold dredging on fish and invertebrates in two California streams. *North American Journal of Fisheries Management* 6:401-409.

Harvey, B. C., and T. E. Lisle. 1998. Effects of suction dredging on streams: a review and an evaluation strategy. *Fisheries* 23(8):8-17.

Harvey, B. C., and T. E. Lisle. 1999. Scour of Chinook salmon redds on suction dredge tailings. *North American Journal of Fisheries Management* 19:613-617.