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SALMON COMMITTEE OF THE PACIFIC MARINE CONSERVATION CAUCUS

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July 20, 2015

The Honourable Gail Shea
Minister, Fisheries and Oceans Canada
200 Kent Street, Station 15N100
Ottawa, Ontario K1A 0A6

Susan Farlinger
Regional Director General
Fisheries and Oceans Canada
Suite 200 - 401 Burrard Street
Vancouver BC V6C 3S4

Re: Adjusting Mixed Stock Harvest Impacts to Protect Salmon Facing Adverse Environmental Conditions

Dear Minister Shea and Ms. Farlinger,

The Salmon Committee of the Marine Conservation Caucus (MCC) supports the letters included with the release of the 2015 North and South Coast Salmon Integrated Fisheries Management Plans (IFMPs) that detail the threat posed to BC's salmon by adverse environmental conditions in 2015, and warn that additional management actions may be necessary. It also endorses the recent closure of lower portions of the Fraser River to recreational fishing for an additional two weeks, as well as the recreational closure on the Somass River.

However, these actions do not go far enough relative to the unprecedented environmental conditions that BC's salmon are facing this year. Most areas of the Province are expected to see a combination of record low flows and high temperatures. In many instances, the temperatures are already approaching lethal levels for salmon, and the hot, dry weather is expected to continue.

While we commend the Department for holding the media briefing on July 14, explaining the severity of the conditions, we were disappointed that DFO stopped well short of announcing needed measures to protect BC's wild salmon.

The Department developed 2015 harvest plans based on "average" conditions. The MCC requested the expected adverse environmental conditions be incorporated in

the 2015 pre-season IFMP consultations, and contingency plans be developed. Our concerns were ignored and consultations proceeded as if 2015 was going to be a "normal" year, even though everyone, including DFO, knew this was unlikely. We are now well into the season and the Department has done little to reduce mixed stock fishing to protect returning salmon. The BC government has closed many streams to recreational fishing to protect spawning salmon. But this does little to increase the number of fish that will effectively spawn, as much of the harvest occurs in mixed stock fisheries well before salmon reach their natal streams.

While future generations of sockeye are more buffered from adverse environmental conditions by rearing in their natal lakes, the same is not true for many chinook and coho populations, particularly on the south coast. High temperatures, low flows, reduced available habitat, and increased predation will impact both the returning adults, and their subsequent progeny. Alevin, fry, and smolts from 2015 spawners will likely face increased mortality, especially with the new El Nino forecasts. Hence, lower than average survival can be expected for both returning adults and their offspring. Both need to be accounted for in managing 2015 chinook and coho fisheries, which are now being conducted in a "business-as-usual" manner in south coast marine waters.

The Fraser River Panel last week raised the Management Adjustment on Early Summer sockeye from .68 to 1. This effectively reduces the available harvest in mixed stock fisheries by over 30%. This was the right thing to do for the wrong reasons. [REDACTED].

However, DFO's defense of the decision is correct: exploitation of returning sockeye in mixed stock fisheries must be reduced to increase the probability that acceptable numbers of sockeye in the nine affected Conservation Units (CUs) successfully spawn.

In Barkley Sound, the 'business-as-usual' marine fisheries that continue in Alberni Inlet overshadowed any relief provided to migrating sockeye from the recreational fishing closure within the Somass River. These marine commercial and recreational fisheries are occurring while water temperatures in the river have reached lethal levels and citizens are reporting pre-spawn mortalities.

Finally, with so many rivers flowing low and lethally warm, we urge caution in the interpretation of catch-per-unit-effort data derived from test fishing and commercial fishing in terminal marine areas to estimate run sizes. It is well known that salmon school in terminal marine areas when river conditions are unfavourable, which can generate overestimates of run size through CPUE indices. We raised this concern in 2014 with respect to late-run Fraser sockeye, which fell short of the in-season

escapement target by 37% (1.4 million fish), and similar issues arose in 2006 with the Tye test fishery on the Skeena.

The federal government must take proactive action by reducing mixed stock harvests in which a relatively high proportion of the fish either retained or discarded are bound for streams facing adverse environmental conditions. Increasing or promoting non-retention is insufficient. It is recognized that discard mortality is much higher than figures DFO attributes to these fisheries, and those fish that survive release will be more susceptible to the impacts of high temperatures and low flows.

The MCC therefore recommends that DFO immediately take the following management actions:

1. Emergency Management Adjustments targeted at passing additional fish through mixed stock fisheries should be considered for all fisheries where populations of concern are encountered. These MAs should include consideration of both current spawners and their progeny.
2. Close all south coast mixed stock recreational fisheries for coho and chinook that encounter fish returning to streams of particular concern. This includes salmon returning to the upper and middle Fraser. Recreational anglers can be reminded of the significant fishing opportunities for pink salmon that occurs this year.
3. Introduce a Management Adjustment for Somass sockeye.
4. Close all fishing in Area 23. The balance of the seine allocation can be taken in a clean-up fishery once the necessary escapement is assured. The same can apply to any remaining recreational allocation.
5. If the adverse environmental conditions persist, impacts on Fraser sockeye and endangered Interior Fraser River coho and sockeye should be significantly curtailed in mixed stock fisheries for Fraser bound pink salmon.
6. Higher than normal temperatures and lower flows are a feature in the Skeena Watershed. Many tributaries with depressed wild sockeye populations are of particular concern. A Management Adjustment must be incorporated into the mixed stock marine fishery to protect populations of particular concern.
7. Reduce reliance on CPUE data as a key assessment tool where fish are schooling or milling as they delay river entry.

These are all difficult decisions and actions but they are necessary considering the unprecedented environmental conditions BC's salmon now face. DFO must take proactive and immediate measures to protect salmon by reducing the impact of mixed stock fisheries, and increasing the number of successful spawners.

Sincerely,



Greg Taylor,
Marine Conservation Caucus



Aaron Hill,
Watershed Watch Salmon Society



Greg Knox,
Skeena Wild Conservation Trust



Jeffery Young,
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