

PACIFIC MARINE CONSERVATION CAUCUS  
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May 11, 2012

Rebecca Reid, Regional Manager  
Fisheries and Oceans Canada  
Pacific Region  
Suite 200 - 401 Burrard Street  
Vancouver, British Columbia  
V6C 3S4  
*Sent via email*

Re: Fraser River Spring 5<sub>2</sub> and Summer 5<sub>2</sub> chinook salmon

Dear Ms. Reid,

We are writing to provide feedback to the Department's letter of April 27 sent to commercial, recreational and First Nations harvesters regarding potential reductions in exploitations rates on Fraser spring and summer 5<sub>2</sub> chinook salmon.

The Pacific Marine Conservation Caucus (PMCC) shares DFO's concerns for declining trends in spawner and total abundance of these and other Fraser chinook CUs and management units. We further believe that while marine survival rates have been poor, overfishing in recreational, commercial, and First Nations fisheries has compounded the problem. Restrictions to these fisheries in recent years, while difficult for all affected sectors, have not resulted in exploitation rates low enough to ensure adequate spawner escapements or rebuilding of depressed populations. Major additional restrictions are now urgently required to support recovery.

In addition to conservation concerns for chinook, many of which the MCC has identified previously, there are also conservation concerns for BC's three pods of southern resident killer whales (SRKWs), a population listed as endangered under COSEWIC and Canada's Species at Risk Act. While unequivocal evidence linking the cause of their poor recovery to chinook abundance is confounded by other known and potentially unknown factors, the following published information and correlations are noted:

- SRKWs depend upon chinook salmon as a critical food resource. This is supported by (extended) summer diet information.
- SRKWs are sometimes in poor condition, which may indicate nutritional stress. Photogrammetry and possibly the peanut-head syndrome identify poor condition.
- Individuals identified as being in poor condition have a higher probability of dying than individuals who have not been so identified. Since 1994, 11 of the 13 individuals that have been identified as being in poor condition have died.
- There is a statistical correlation between indices of chinook salmon abundance and

- fecundity, death rates and survival rates of SRKWs.
- Evidence suggests that increased availability of chinook salmon would aid the recovery of SRKWs.

Further, we note that the base period for Zone 1 Fraser 5<sub>2</sub> chinook is 1979 -1982, a time when the average spawner abundance was about 30,000. This period corresponds with a period of low survival and increased mortality for SRKWs. As such, when conservation concerns exist for Fraser chinook it appears to extend to fitness and survival concerns for SRKWs.

While we are aware the department is awaiting the findings of the SRKW scientific review, it is unlikely these recommendations will be timely or definitive and decisions to act based on the best available information will still be required. As the department is likely aware, there is a high degree of public interest and concern for the future of these animals. This concern comes with expectations that chinook management decisions will no longer be made independently of the food supply needs for SRKWs. It is necessary therefore, from both a biological and legal perspective to be managing Chinook for, among other things, the needs of endangered killer whales.

Please recall that in our March 28, 2012 letter to Minister Ashfield, we called for an immediate reduction in the total exploitation of spring 4<sub>2</sub> and 5<sub>2</sub> and summer 5<sub>2</sub> Fraser chinook salmon in Canadian fisheries by *at least* 50% from 2011 exploitation rates. Thus, we identify DFO's *Option 2* – a reduction in the total Canadian exploitation of spring and summer 5<sub>2</sub> chinook by *at least* 50% from the 'base period' (2000-2006) exploitation rates – as barely adequate to address the conservation and recovery of these stocks. We note this position is consistent with the Fraser River Aboriginal Fisheries Secretariat and consistent with Canada's mandate to place the conservation of Pacific salmon CUs as it's top management priority. Conversely, DFO's *Option 1 (modified status quo)* is completely unacceptable.

We further identify the following additional actions as necessary to the recovery and protection of depressed and threatened Fraser chinook populations;

- The development of chinook recovery plans for these depleted populations must begin immediately.
- Habitat degradation and water extraction threaten several Fraser chinook populations. DFO must be far more proactive in protection of Fraser chinook habitat and stopping activities known to degrade/destroy such habitat.
- DFO's Kristi Miller raised concerns at the Cohen commission about chinook exposure to viruses. DFO must be far more proactive in preventing and acting on these threats.
- Increased chinook production from salmon hatcheries is not the solution. A growing body of scientific literature suggests hatcheries pose a host of risks to wild salmon and may only replace wild fish with those having less resilience and adaptability to survive in the future.

- Far greater catch monitoring and enforcement of fishing regulations must occur in all fisheries. Prosecution of violators must be sufficient to ensure compliance with conservation-based regulations.
- Given the uncertainty of catch and escapement data, due in part to inconsistent recoveries of coded-wire-tags in fisheries, the significant public interest in salmon conservation would be well served through highly precautionary, conservative fisheries until the depleted stocks recover.

Thank you for your consideration and response to these concerns that are of the utmost importance to British Columbians.

Sincerely,

Craig Orr, Aaron Hill, and Jeffery Young  
MCC south coast representatives to the Integrated Harvest Planning Committee

Misty MacDuffee and Greg Knox  
MCC north coast representatives to the Integrated Harvest Planning Committee