



Secwepemc Fisheries Commission

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April 20, 2009

Jeff Grout
Regional Resource Manager, Salmon
Department of Fisheries and Oceans
200-401 Burrard Street
Vancouver, BC
V6C 3S4

**Re: Recommendations and Comments for the Pacific Region Integrated
Fisheries Management Plan (IFMP) Southern BC 2009/10**

Dear Mr. Grout:

This letter is written on behalf of the following nine Secwepemc communities that are members of the Shuswap Nation Tribal Council (SNTC):

Adams Lake Band
Bonaparte Indian Band
Kamloops Indian Band
Little Shuswap Indian Band
Neskonlith Indian Band
Simpco First Nation
Skeetchestn Indian Band
Splatsin First Nation
Whispering Pines Indian Band

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These communities are not engaged in the BC Treaty Process and maintain their assertion that their Aboriginal Title and Rights exist over the entire territory, as they have done so since time immemorial. SNTC was formed in 1980 as an effort of the Secwepemc chiefs to advance the issues of aboriginal rights. It is a political organization, which works on matters of common concern, including the development of self-government and the settlement of the aboriginal land title question. SNTC is involved with natural resources management within the Secwepemc Nation territory and the creation of economic development opportunities for Secwepemc communities.

Secwepemc Fisheries Commission (SFC) is a fisheries organization formed in 1992 that works within the mandate of SNTC communities and Tribal Chiefs. We support the work of our communities to provide stewardship for the fisheries in their territories and to assert their traditional fisheries rights within a co-management framework. SFC responds to the IFMP in writing annually. We believe it helps us define our role in management and helps us to formulate our perspectives and positions on the issues. DFO's efforts in developing and consulting on the document are appreciated.

However, SFC remains concerned with some of DFO's management decisions for Fraser salmon. In general, there needs to be much faster reform to meet Wild Salmon Policy objectives for conservation and biodiversity. Continuing to manage Fraser salmon by large aggregates does not provide the Secwepemc communities with certainty and stability for our FSC fisheries. An abundance of salmon is needed annually in a wide range of our local streams to ensure our fisheries can continue to be successful. Salmon need to be managed at the population or conservation unit level to ensure the needs of our communities are met.

SFC has met bilaterally with DFO staff in March and early April to discuss fisheries management issues and our communal harvest plans in preparation of our review of the IFMP. SFC has identified conservation and harvest objectives for stocks in our territory. In this letter SFC will present our 2009 communal harvest targets and then offer comments and recommendations concerning conservation issues relevant to the IFMP.

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COMMUNAL HARVEST TARGETS

The communal harvest target numbers are provided for this year only and are without prejudice to future years – targets may change in future years depending on the health of stocks and harvest interests of our communities.

SFC has established preliminary 2009 FSC harvest requirements for our communities in the Thompson for early and late summer sockeye and chinook as follows:

	Sockeye				
	Early Stuart	Early Summer	Summer	Late Summer	TOTAL
Pre-Season Harvest Forecast	0	* 7,884	2,500	970	11,354

* 1800 Scotch/Seymour, 6,084 Raft/Fennell/North Thompson

	Chinook				TOTAL
	Spring 4-2	Spring 5-2	Summer 4-1	Summer 5-2	
Pre-Season Harvest Target	*508	150	3,500	200	4,358

* Nearly all from Bonaparte River - escapement and harvest levels closely monitored.

Secwepemc communities have priority access to these fish over direct or indirect harvests by commercial and recreational fishing sectors. It is DFO's fiduciary obligation to ensure our harvest requirements are met and take priority over other non-FSC fisheries.

Recommendation 1: DFO must describe in detail how our communal harvest targets will be managed through all other interception areas, both marine and freshwater.

IFMP COMMENTS & RECOMMENDATIONS

SOCKEYE

Early Summer Run Timing:

Recommendation 2: SFC recommends DFO adopt sockeye escapement plan Option 3 - 36% ER and TAM 55% at the 50p for Early Summer sockeye for the following reasons:

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a. SFC communities plan to harvest 1,800 sockeye of Scotch Creek/Seymour River origin and 6,084 from Raft/Fennell/North Thompson origin. SFC community harvests are linked to the strength of the runs returning to the near terminal areas within the territory. Thus, Option 3, which provides an overall increased escapement target, will facilitate achieving these harvest targets while conserving these populations. It will also enable the N. Thompson stocks to continue building (Figure 1a) while rebuilding South Thompson stocks (Figure 1b).

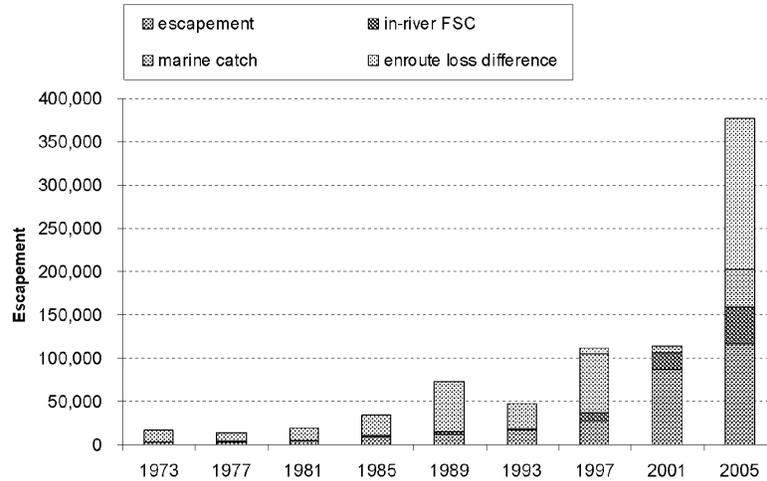


Figure 1a. Early Summer Sockeye 2005 Cycle Year North Thompson (Raft, Fennell, E. Misc.)

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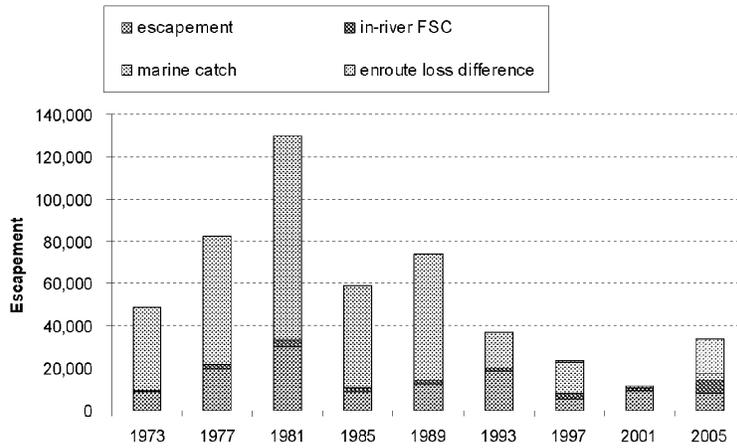


Figure 1b. Early Summer Sockeye 2005 Cycle Year Shuswap (Scotch, Seymour).

b. Prior to 2001, exploitation rates (ER) were approximately 80%. The ER 2001 and 2005 was approximately 30% or less, affording improved escapement for these stocks. (Figs. 2 & 3); SFC does not want to see a return to the ERs experienced previous to 2001.

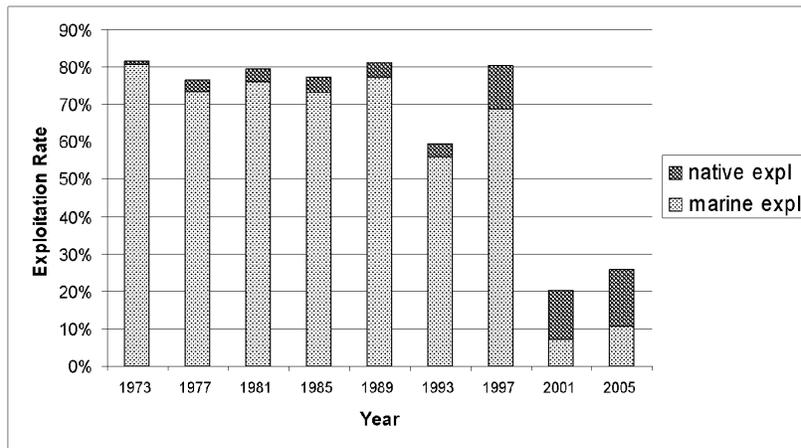


Figure 2. Early Summer Sockeye Average Exploitation Rates for the 2005 cycle year for Raft, Fennell, Early Miscellaneous, Scotch and Seymour.

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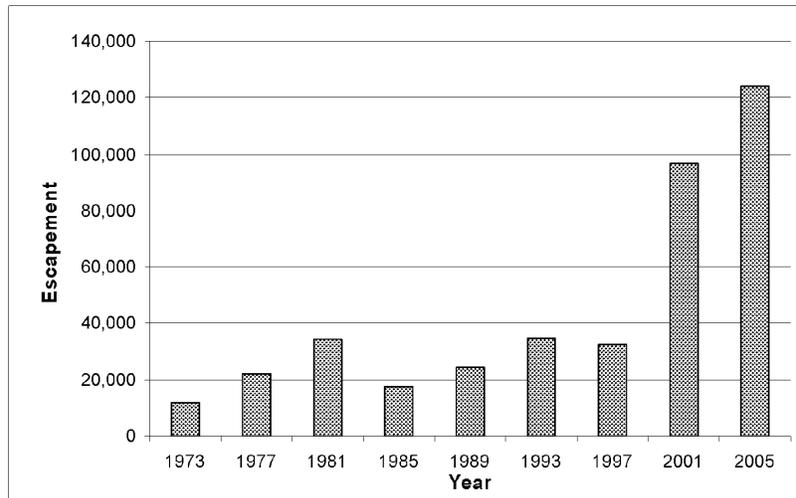


Figure 3. Early Summer Sockeye Combined Escapements for the 2005 cycle year for Raft, Fennell, Early Miscellaneous, Scotch and Seymour.

- c. Option 3 represents an increase in escapement of 16,524 sockeye to the Thompson compared to Option 2 (Appendix 1 & 2)
- d. To account for numerous uncertainties such as population dynamics in FRSSI, potential forecast over-estimation, and application of relatively insensitive performance measure indicators for our populations also in FRSSI.
 - i. *Uncertainty in interpreting the FRSSI simulation results* – Four of the eight stocks modeled during the FRSSI process have considerably less data than the rest. Two of which, Fennell and Scotch creeks, have a data time series starting in the 1960s and 1980s, respectively. This translates into increased uncertainty in the population dynamics of these two stocks e.g., S/R data, thus uncertainty when interpreting the FRSSI simulation results.
 - ii. *Potential forecast over-estimation of the Early Summer aggregate* – There is limited historical catch data, and thus recruitment data, for

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the “Miscellaneous” component of the Early Summer aggregate (e.g., there is no clear description regarding where they were accounted for in past fisheries). If their catches were being attributed to another Early Summer stock, it may be causing an over-estimation of the productivity of that stock and/or the entire aggregate and thus overestimation to the forecast.

- iii. *Historical productivities used in the model may not be reliable* – FRSSI escapement strategy indicators e.g., 4year Avg S < BM2, for Early Summer is relatively insensitive across all 4 escapement plan options. The model may not account for recent poor productivities that some of the stocks have been experiencing.

Recommendation 3: DFO explore with SFC FRSSI performance measure indicators that are reflective of biological, social and economic objectives, e.g., year to year variability in escapement, escapement trend over the next twelve years, etc. Current indicators for the early summer aggregate e.g., 4yr Avg S < BM2 do not reflect the interests of Secwepemc communities.

Late Summer Run Timing (Shuswap):

The 2009 escapement plan presented in the IFMP for late summer sockeye is unacceptable to Secwepemc communities. Specifically, the application of the “arbitrary and non-biologically based” 20% exploitation rate particularly when the pMA is 0.87 is problematic.

The exploitation rates outlined within FRSSI for Late Summer sockeye is 0% for all Options, thus suggesting that no harvest mortality should be allowed. Furthermore, very poor escapements on the subdominant years also points to the fact that a 20% ER is not biologically sustainable especially when they continue to experience increased mortality due to early river entry. In 2008 this type of management measure resulted in only 164 spawners in the entire Shuswap basin, which cannot be tolerated. It puts

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future productivity of this stock on this cycle in jeopardy, thereby seriously limiting the ability of Secwepemc communities to provide for their FSC requirements.

Despite this situation, an “arbitrary and non-biologically based” exploitation rate floor of 20% is again being proposed for 2009. Applying a 20% ER combined with an 87% pMA translates into an approximate escapement to the Shuswap of 10,000 fish. This number is far less than escapement benchmark (BM1) of 111,100 as identified by FRSSI. Further, it is substantially less than the long term average escapement of 78,000 for this cycle.

Recommendation 4: DFO initiate with First Nations and others a thorough discussion or debate on the policy surrounding the issue of the “arbitrary” exploitation rate floor (20%) for Late Summer sockeye, especially since the issue of increased mortality continues for the subdominant returns.

Recommendation 5: Until the above stated recommendation has been implemented, SFC recommends a more cautious exploitation rate of 10% be used (see Appendix 3). This ER would translate into a potential escapement of 11,349 (including Late and Miscellaneous Shuswap), slightly higher than the average escapement over the past four cycles (9,300).

General Sockeye Recommendations:

- Move harvests away from the mainstem Fraser to reduce impact on weak or small populations co-migrating upriver with target populations (i.e., harvest in Pitt River to protect upriver Early Summer sockeye stocks and harvest in Harrison River to protect late Adams/Shuswap sockeye).
- Implement window closures to protect small or weak populations (i.e., no fishing until 90% of a weak population has migrated through all interception fisheries in marine and Fraser river areas).
- Test fisheries need to be conducted prior to any fishing to ensure there is TAC available; do not rely solely on pre-season forecasts to predict TAC.

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- Do not rely solely on historic timing information to predict TAC in marine area (runs may be early or late).
- Need additional in-river test fisheries to provide information to manage fisheries at more discrete levels to protect conservation and to ensure upriver First Nations attain their FSC requirements.

CHINOOK

SFC supports DFO's initiative to develop escapement targets for Fraser chinook salmon. Escapement targets are required before allocation and associated exploitation rates can be applied to ensure stocks are managed appropriately.

Our position remains the same as in 2007 and 2008: No new fisheries, expansion of current fisheries, or increases in effort of present fisheries targeting chinook stocks destined for the Thompson system should occur until scientifically defensible escapement targets are established and agreed to by the Secwepemc people.

Recommendation 6: Demonstration fisheries identified in the IFMP should include a study design that describes how the project will address stocks of concern in the fishery. DFO should provide SFC with the study design prior to the demonstration fishery being implemented.

Spring and Summer (Age 5 stream-typed) Chinook

SFC is extremely concerned with the status of both spring and summer (5 year olds) chinook returns to our Territory. Several populations in the Thompson-Shuswap area are in a serious state of decline. This means that our Secwepemc communities cannot meet their FSC requirements for chinook salmon. The conservation needs of these stocks must be a priority for DFO and all fishing sectors. More fish need to be put on the spawning grounds to rebuild these stocks and enable our communities to meet their FSC requirements.

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In order to support DFO's management actions to rebuild these stocks there needs to be a greater understanding of how DFO developed its management plan and how it summarized the post-season results for 2008.

Recommendation 7: DFO and First Nations establish an ongoing technical collaborative process to share information and work through data and calculation methods used to develop management measures for Spring / Summer (age 5) chinook.

Recommendation 8: CWT information needs to be incorporated into the 2008 analysis regarding the effect of the Early-timed Chinook management measures DFO is applying.

Recommendation 9: The DFO 2009/2010 Integrated Fisheries Management Plan (IFMP) should include language stating management of Fraser Spring and Summer Chinook is subject to on-going analysis and discussion through 2009 and 2010.

Recommendation 10: DFO and First Nations should conduct a workshop to reconcile the interpretation and implementation of the priority of First Nations fishing for food, social and ceremonial purposes as described under case law – *Sparrow, Gladstone, Jack, John, and John, etc.*

Recommendation 11: DFO must make stock assessment a priority under the Salmonid Enhancement Program to better understand where stocks of concern are being harvested. In particular, there needs to be CWT indicator stocks developed for Fraser Spring and Summer (5 years).

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Recommendation 12: Creel surveys should be mandatory in all recreational fisheries including CWT head collection and reporting and size sampling (particularly on stocks of concern).

Recommendation 13: SFC does not support selective mark fisheries under the PST for chinook unless impacts to wild stocks are clearly understood and mitigated (incidental catch and marine juvenile competition).

Recommendation 14: DFO should work with First Nations to develop a FSC sharing process for Fraser chinook.

INTERIOR FRASER COHO

SFC agrees with the conservation measure outlined in the IFMP regarding Interior Fraser Coho (*“limit Canadian exploitation rate to less than 3%”*).

INTERIOR FRASER STEELHEAD

SFC agrees with the development of a management framework for Interior Fraser Steelhead, however, we request that SFC is fully consulted on the escapement targets and our FSC requirements.

PINK SALMON

SFC is interested in pursuing economic fisheries on Thompson River pink salmon.

Recommendation 15: Thompson River pink salmon escapements need to be estimated separately from Fraser River escapements.

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SALMON ENHANCEMENT PROGRAM (SEP)

SEP has provided a valuable service in fisheries management particularly related to stewardship and stock assessment since its inception in the mid-1980s. Conversely, it has also exacerbated many of the management problems we now face. Salmon production from hatcheries and spawning channels has provided a significant contribution to the fishing economy. However, this has created dependence by all sectors on enhanced production. Targeting fisheries on enhanced stocks has often been to the detriment of wild stocks.

Recommendation 16: DFO should consult with First Nations to determine how SEP funds are prioritized regarding:

- the maintenance of conservation objectives particularly related to stock assessment needs (CWT indicator programs);
- rebuilding of salmon stocks that First Nations depend on for FSC requirements.

Recommendation 17: DFO and First Nations need to develop in-season harvest management measures to ensure enhanced stocks are protected through fisheries to ensure productivity builds. (e.g. in 2009 DFO is proposing to enhance sockeye from the upper Adams River).

Thank you for this opportunity to comment on the IFMP. Please review the above concerns, recommendations and requests and address them in writing to us. If you have any questions pertaining to this letter or require further clarification, please contact the undersigned at (250) 828-2178.

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Sincerely,

Pat Matthew, Conservation & Stewardship Coordinator

Secwepemc Fisheries Commission

c.c. Chief Nelson Leon SNTC Fisheries Portfolio Holder
SFC Steering Committee representatives
Fraser River First Nations (via FRAFS)
Paul Sprout DFO-RHQ
Paul Ryall DFO-RHQ
Barry Rosenberger DFO BCI
Barry Huber DFO BCI
Les Jantz DFO BCI
Dean Allan DFO BCI
Adrian Wall DFO LFR
Grand Chief Doug Kelly BC First Nations Fisheries Council

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Appendix 1

Predicted Escapements based on 50p Option 3 for Early Summer run Sockeye Salmon in Secwepemc Territory

Early Summer Stocks	50P Forecast	Exploitation Rate at 50P	ER at 50p # fish removed equivalent	Escapement Past Fisheries	pMA	pMA # fish equivalent	Predicted Escapement	BM 1
Combined Fennel, Raft, Scotch, and Seymour	162,000	0.36	58,320	103,680	0.42	43,546	60,134	13,000
Combined Miscellaneous (Shuswap, North Thompson mainstem and tributaries)	245,000	0.36	88,200	156,800	0.42	65,856	90,944	NA

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Appendix 2

Predicted Escapements based on 50p Option 2 for Early Summer run Sockeye Salmon in Secwepemc Territory

Early Summer Stocks	50P Forecast	Exploit Rate at 50P	ER at 50p # fish removed equivalent	Escapement Past Fisheries	pMA	pMA # fish equivalent	Predicted Escapement	BM 1
Combined Fennel, Raft, Scotch, and Seymour	162,000	0.43	69,660	92,340	0.42	38,783	53,557	13,000
Combined Miscellaneous (Shuswap, North Thompson mainstem and tributaries)	245,000	0.43	105,350	139,650	0.42	58,653	80,997	NA

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Appendix 3

Predicted Escapements based on 50p Option 3 for Late Summer run Sockeye Salmon in Secwepemc Territory

Late Summer Stocks	50P Forecast	Exploit. Rate at 50P	ER at 50p # fish removed equivalent	Escapement Past Fisheries	pMA	pMA # fish equivalent	Predicted Escapement	BM 1
Late Shuswap	70,000	0.1	7000	63,000	0.87	54810	8,190	111,100
Misc Shuswap	27,000	0.1	2700	24,300	0.87	21141	3,159	NA

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