

Upper Fraser Fisheries Conservation Alliance

May 10, 2010

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Attention: Paul Sprout

Re: 2010 Upper Fraser River Sockeye and meeting the FSC needs for Natives

I have been directed by the board of the Upper Fraser Fisheries Conservation Alliance to write this letter to bring to your urgent attention issues surrounding Early summer sockeye and Summer sockeye runs which spawn in the upper Fraser region.

2010 looks to be a potentially problematic year for First Nations that conduct their food fishing for Fraser sockeye upstream of the Quesnel River confluence (i.e. relying upon access to sufficient abundances of Early Stuart, Nadina, Bowron and Late Stuart and Stellako stocks of sockeye).

The current forecasts for these stocks are as follows:

Table 1. 2010 IFMP UFFCA Area Sockeye Forecast

Forecast	Early Stuart	Nadina	Bowron	L. Stuart	Stellako	Quesnel	Chilko	Taseko*	Total
p25	26,000	16,000	700	21,000	96,000	215,000	1,273,000	10,000	1,657,700
p50	41,000	30,000	1,300	60,000	156,000	438,000	1,958,000	14,000	2,698,300
p75	66,000	60,000	2,500	169,000	254,000	909,000	3,011,000	22,000	4,493,500
Effective Female Spawners	15,900	4,500	800	14,000	80,000	90,000	71M (smolt count)	N/A	

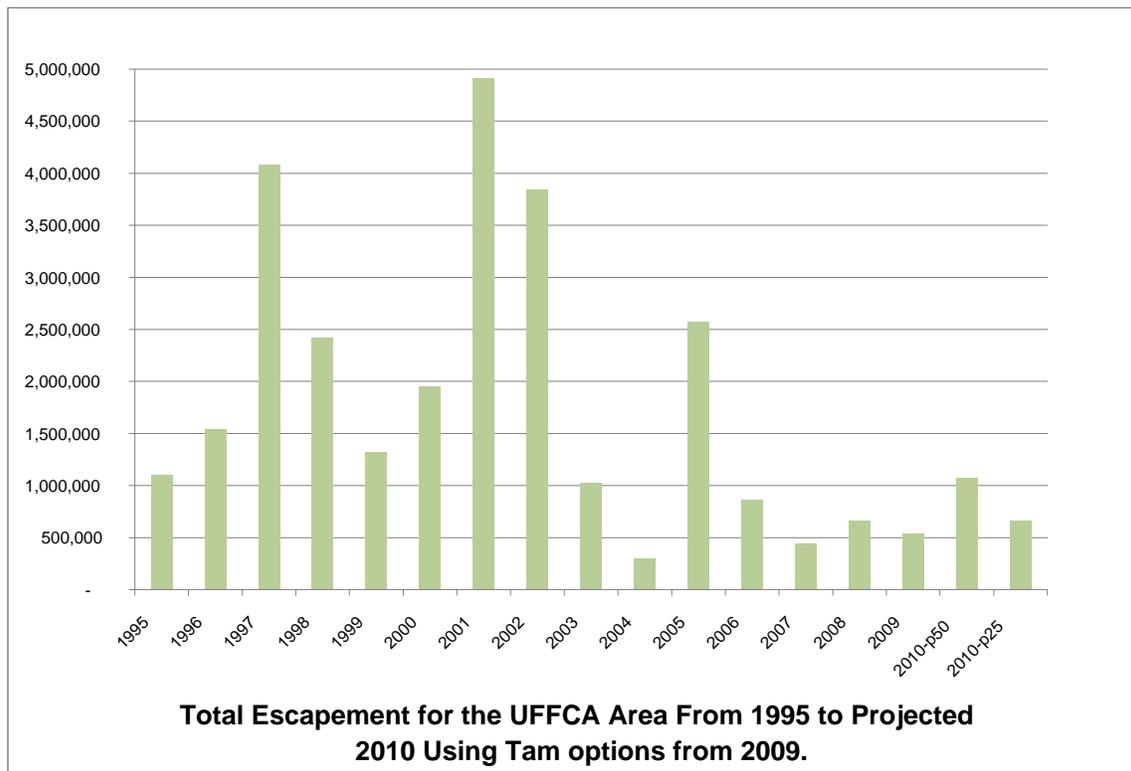
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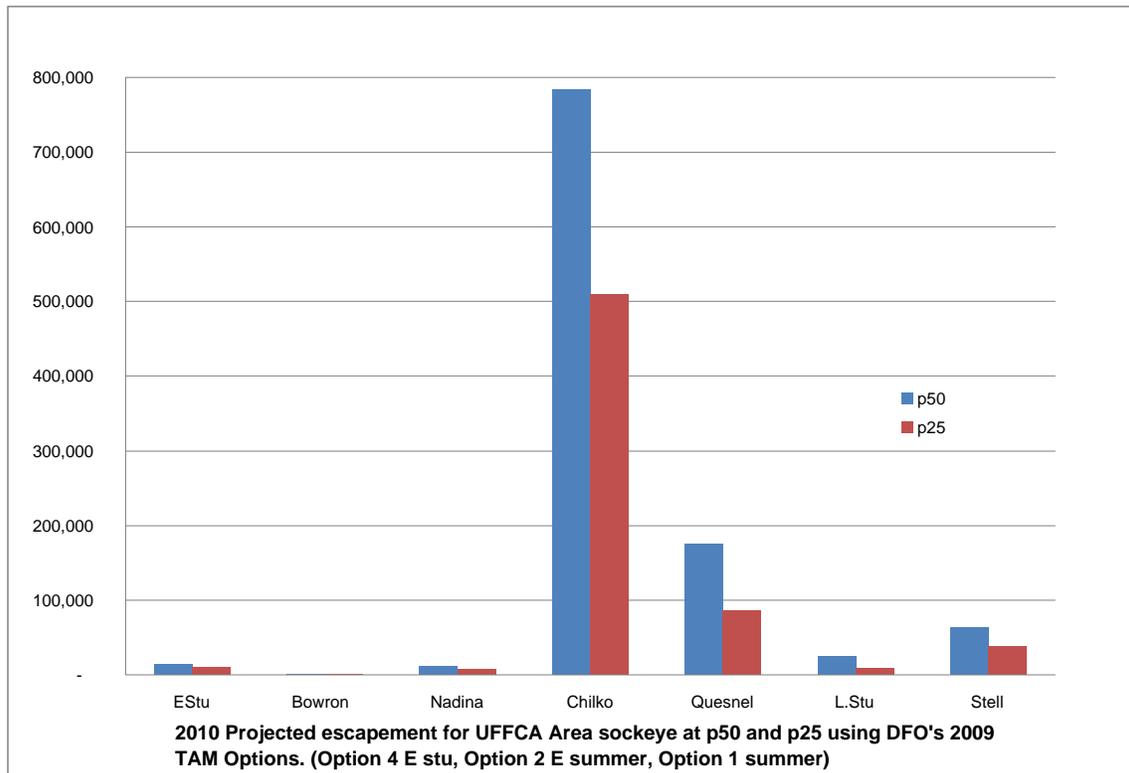
The numbers in the previous table represent forecast total run size for each stock materializing in the marine approach areas, and any en-route loss or harvest will come out of the forecast totals.

Summary of Issues

Although the forecast for sockeye returning to the UFFCA area does not appear too bad when compared to recent years, the overall trend from 1995 to 2009 is of declining escapement, and most of the 2010 forecast sockeye abundance for the UFFCA Area stocks is from Chilko sockeye (67 – 77% from the p75 to p25 forecasts respectively), with the next highest forecast abundance from Quesnel River. The Chilko River confluence with the Fraser is in the lower portion of the UFFCA area. **Therefore these sockeye are not available for harvest upstream from the confluence.**

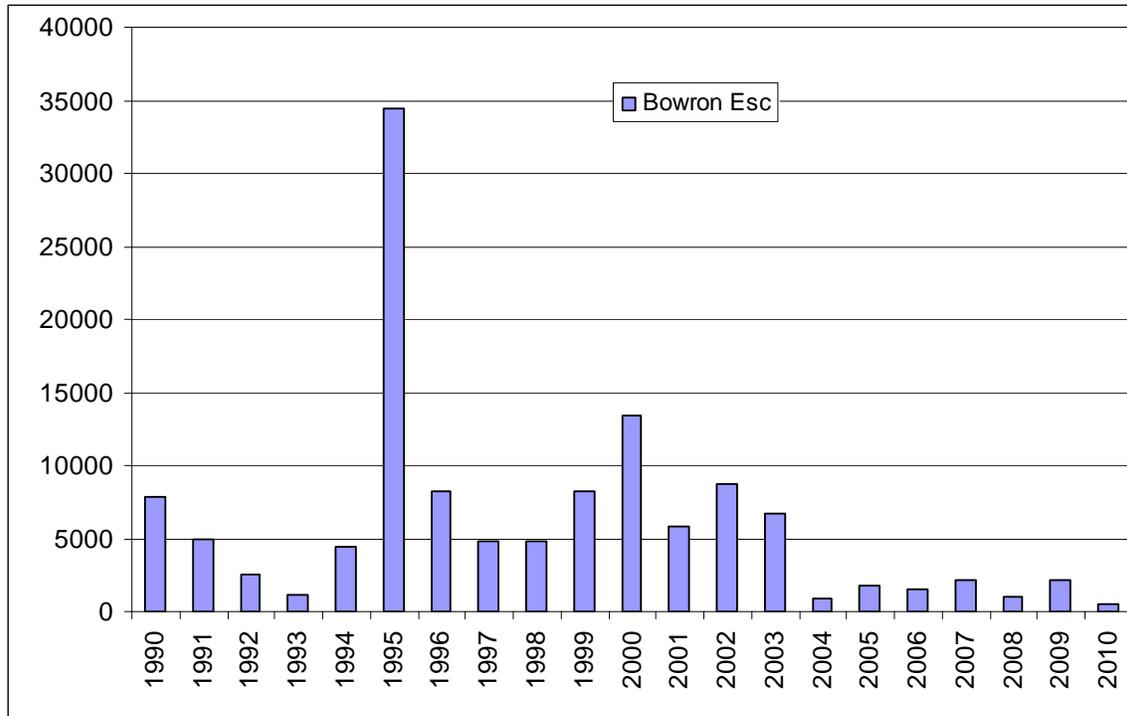
Applying DFO's 2009 Total Allowable Mortality Options to the forecast shows most of the escapement to Chilko and Quesnel rivers in 2010. This could result in a situation of most of the available Summer TAC being generated from the Chilko and Quesnel Rivers.



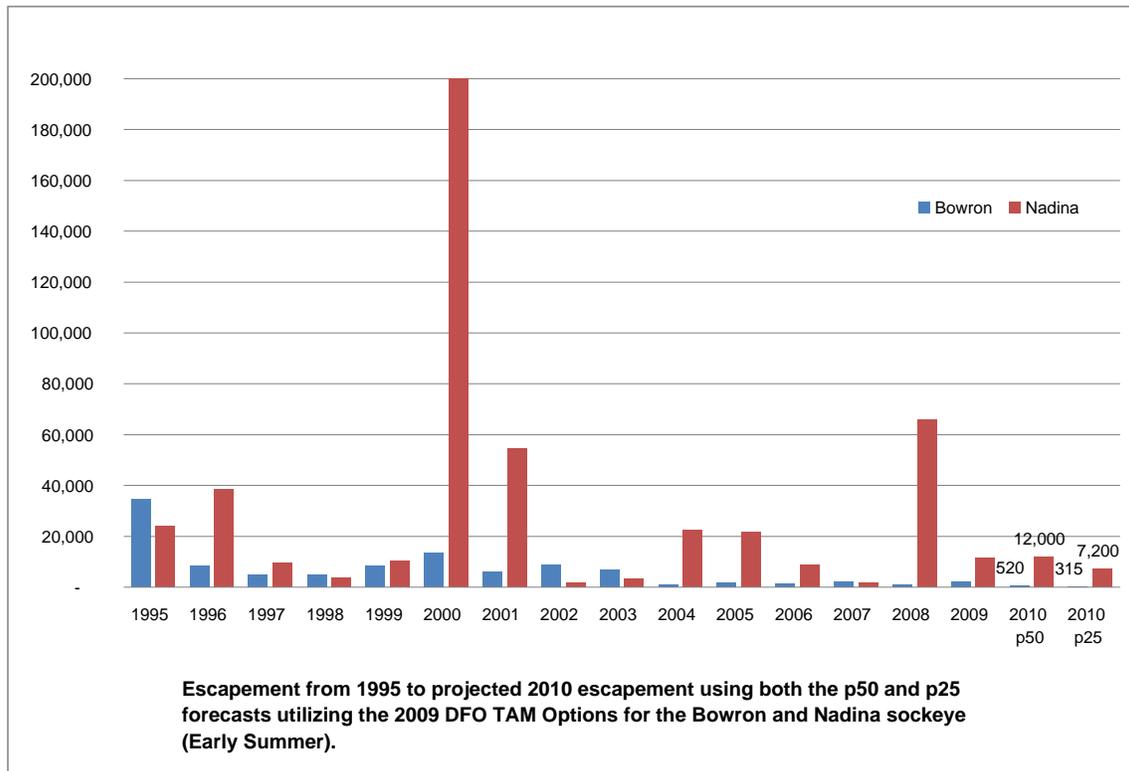


Approximately 75% of the projected 2010 UFFCA area sockeye abundance is in the Chilko River, and most of the abundance is projected to return to the Chilko and Quesnel systems. Bowron escapements would be the lowest on record under this projected scenario.

The Bowron forecast is poor, and when compared to historic escapement, if the TAM rules used in 2009 are used in 2010 for Early Summers, this could result in record low escapement for this stock. The Bowron sockeye, which are categorized as Early Summer sockeye, have been in an ongoing state of decline for a number of generations, and in recent years have reached dangerously low escapements (see figure next page). The stock most likely meets all technical criteria necessary to be termed “Endangered”, and has for the last two generations. The 2010 forecast is one of the lowest on record, and the stock is proposed to be subject to harvest rates of 32-40% at the p50 forecast, which would likely result in the lowest escapement on record.



Bowron escapement from 1990 to 2009, with projected escapement for 2010 based on p50 forecast and Option 2 TAM.



Bowron and Nadina escapements from 1995 to projected 2010 escapements at p50 and p25 forecast using 2009 DFO TAM rules.

The p50 forecast total run size for all sockeye stocks that migrate back to Prince George would amount to a low escapement to the area (i.e. even if they were all allowed or managed to return). However, what DFO is proposing in terms of management measures for the Early Summers (Bowron, Nadina) and Summers (Late Stuart and Stellako) is concerning.

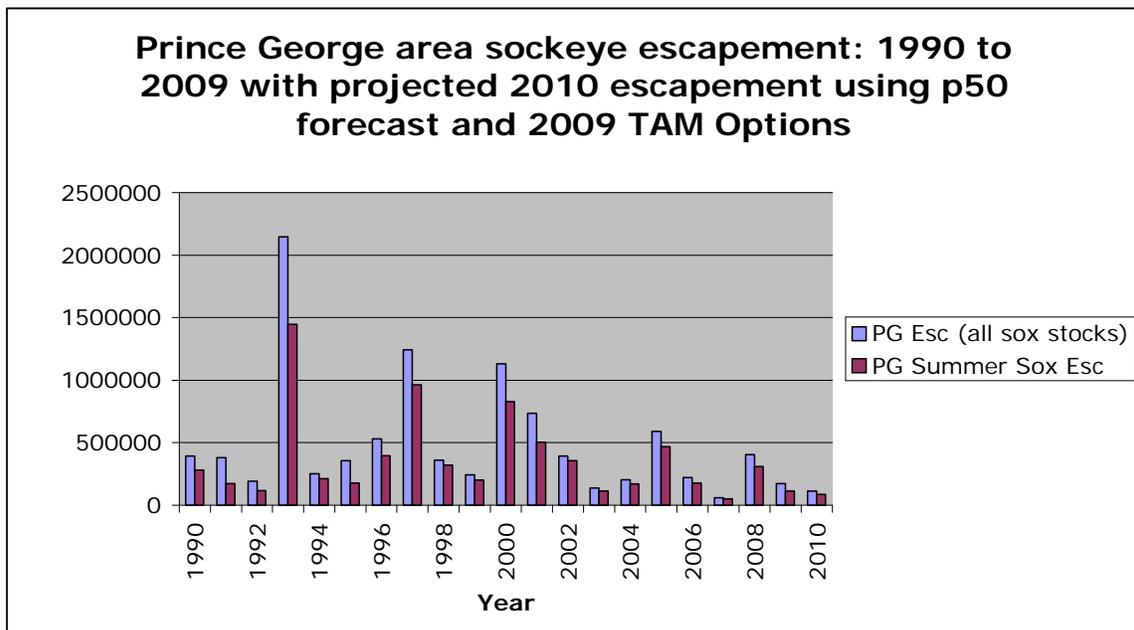
All of DFO’s proposed management options (as presented in the IFMP) for Early Summer and Summer sockeye in 2010 would see approximately 40% of the returning fish allowed to escape to Prince George. That would mean, if everything worked out as planned, that just over 100K sockeye would reach Prince George (all stocks), and less than 100K summer sockeye, which provide more than 90% of the FSC harvest in recent years. If you consider the recent trends in forecast total run sizes and planned escapement strategies relative to actual near terminal returns, a similar outcome this season would mean even fewer fish returning.

The figure below shows what the past terminal escapements (1990-2009) of all sockeye stocks and just Summer stocks migrating past Prince George have been, and provides an estimation of how escapement in 2010 would compare

based on the p50 forecast and utilizing the TAM Options from 2009 (basically a window closure for Early Stuarts and 40% escapement for the remaining stocks).

Under this 2010 scenario, numbers of sockeye reaching Prince George would be lower than last year, and likely only lower than 2007 escapements.

In the 1990 to 2009 period, the sockeye FSC harvest by First Nation groups reliant on these stocks did not reach DFO's communal license targets. Even if all of the sockeye forecasted to return to the Prince George area managed to escape to this area, it would still be a relatively poor return. However, in 2010, DFO is providing p50 TAM Options that would allow only approximately 40% of the Early Summer and Summer sockeye destined for the Nechako to escape.



Prince George area sockeye escapements. 2010 escapements are projected based on the p50 forecast and utilizing the DFO TAM Options from 2009.

Primary Issue Summary

- Approximately 75% of the projected 2010 UFFCA area sockeye abundance is in the Chilko River, and most of the abundance is projected to return to the Chilko and Quesnel systems.
- **Utilizing DFO's TAM Options from 2009 at the 2010 p25 and p50 forecast levels could result in record low escapements in Bowron River**
 - **Allowing high rates of harvest on this stock to continue given its recent return and escapement performance is very concerning**
- Taseko sockeye are also an Early Summer sockeye stock – part of the Early Miscellaneous portion of the aggregate and rarely discussed as a specific stock. Taseko sockeye are difficult to enumerate and have been enumerated at extremely low abundances for several years (a 2009 estimate of 60 was provided in the DFO escapement estimate). **At abundances such as this the stock is a conservation concern.**
- 2010 looks to be a potentially problematic year for First Nations that conduct their food fishing for Fraser sockeye upstream of the Quesnel River confluence (i.e. relying upon access to sufficient abundances of Early Stuart, Nadina, Bowron and Late Stuart and Stellako stocks of sockeye)
- Forecast sockeye returns to the Prince George area could result in returns of approximately 100,000, very low when compared to past years, and near record lows

Summary and Next Steps

In 2010 it appears DFO is proposing management measures to allow substantial mixed stock fisheries, including commercial opportunities, and under pressure to do so. FRAWG or the Conservation and Harvest Planning process provides an opportunity to begin discussion of these issues with DFO and Fraser and approach area First Nations, but these discussions are not enough, and specific analysis and planning for the 2010 sockeye season must be provided by DFO to Upper Fraser First Nations.

The UFFCA is requesting DFO to provide specific planning options and information to Upper Fraser First Nations with the objective of maximizing the sockeye escapement to the Upper Fraser in order to protect specific stocks and timing groups outlined in this letter, and to ensure adequate abundances of sockeye return to the geographic areas in the Upper Fraser that are necessary to meet conservation and FSC needs.

Information and analysis is required from DFO to discuss and answer the following:

- Shaping of fisheries to reduce harvest pressure on Early Summers and Summers in order to protect stocks of concern in those groups and to provide adequate abundance to meet FSC needs
- The implementation of various window closure to protect stocks of concern in the Upper Fraser
- Shaping of fisheries to utilize the dominant Late return for meeting FSC needs in areas that have access to those fish in order to offset the protective measures implemented on earlier returning sockeye stocks
- Operational planning and analysis clearly showing the impacts and benefits of the various harvest rules proposed by DFO, and applied to forecast abundances, by geographical area
 - Specifically: What are the benefits and impacts to conservation concerns and FSC fisheries by area under various scenarios?
- What is the reasoning behind DFO's apparent willingness to implement harvest rules that would result in the potentially lowest escapement on record for Bowron sockeye?

The UFFCA requests the above information to be provided to the UFFCA and all Upper Fraser First Nations by no later than May 31, 2010 in order to better inform the planning process, and to provide the foundation for informed discussion as the 2010 sockeye season approaches.

Many Thanks

UPPER FRASER FISHERIES CONSERVATION ALLIANCE

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