

Random thoughts from a streamkeeper:

We need to make the long range vision of having biologically sustainable numbers of salmon more important than current social and economic values. Otherwise we will continue to deplete their numbers.

Strategy 1- Standardized Monitoring of Wild Salmon Status

€ What advice do you have about the delineation of CUs and the protection of genetic diversity?

This looks like an excuse for sacrificing many smaller streams and spawning areas as long as some fish in the CU are still surviving. We need to protect salmon by watershed not just genetic diversity. How does one standardize monitoring in an area as large and diverse as the lower Fraser. A watershed/sub watershed based approach would be far superior.

€ What criteria should go into identifying the lower and upper benchmarks of biological status?

Need to be based on pre-development levels of salmon numbers, say early 1800's, not present or recent past. Set the standards high, in other words, it doesn't take much change from original levels to trigger a code amber and hence movement toward rating biological factors higher than social/economic in the management plans. I am concerned that management in the the green zones will be allowed to proceed based on social and economic factors rather than biological factors until the stocks have declined enough to put them into the amber zone. Shouldn't we be doing all we can to protect the most pristine, least damaged areas while trying to recover those in the red and amber rating zones?

We ALWAYS need to look at the long range social and economic values, not just for the next few years or the lifetime of those currently exploiting the resource. Though difficult, we must get a clear picture what the true cost of the loss of a salmon population, or all wild salmon, would be to the health of our forests, rivers, lakes, oceans, other wildlife, human food sources, etc.

€ How can monitoring of biological status be done effectively and how could First Nations and local organizations be involved? Streamkeepers and other citizen stewardship groups, including First Nations, already collect huge amounts of habitat, juvenile and spawner data in a structured manner, many using the DFO co-designed Streamkeepers method. Their work needs to be respected, encouraged, collected and used, not ignored. More groups need to be encouraged to form, perhaps based at schools or colleges if there are insufficient volunteer citizens in a watershed to do the monitoring and reporting.

DFO funding to support citizen data collection needs to be freed up from the bloated administrative budget reserved for Ottawa. Spend the money on the ground, not on bureaucracy.

Local observers should also be encouraged to report illegal and detrimental activities to someone who can move to enforce them. All the data in the world is useless if no one enforces the decisions made on the basis of the scientific data.

€ Have we missed any action steps in our proposed standardized monitoring of wild salmon status?

Enforcement of the laws we have in place to protect fish from over fishing and habitat destruction. Enforcement of fishing quotas. Enforcement of poaching prohibitions. Officers on the ground to carry out the enforcement.

Strategy 2- Assessment of Habitat Status

€ What suggestions do you have for appropriate benchmarks and indicators of habitat quality and quantity?

Studies by others have shown that it only takes a small reduction in forest cover to affect the function of a salmon stream/river. Development of impervious surfaces in watersheds are known to seriously affect salmon habitat. The new RAR being implemented in BC allows for more incursion into riparian areas and loss of habitat and does not address watershed scale issues. Why aren't the protection zones being increased in size to protect habitat rather than allow more development? Habitat issues must include water quality and quantity as well as health of gravel beds and rearing areas in the freshwater environment. Restoration projects are useless if pollution events kill the fish or their food organisms or if the stream hydrology is so severely altered, usually by flashy flows, that the instream works are destroyed.

€ How can interested individuals and organizations be effectively involved in the assessment and monitoring of habitat status within CUs?

See Pacific Streamkeeper Federation model, a watershed-based model. To support this work government must take citizen groups' work seriously and provide enough back up to press charges when spills, habitat destruction or illegal fishing occurs and is reported by the citizen groups.

€ Have we missed any action steps necessary to the assessment of habitat status?

Strategy 3- Inclusion of Ecosystem Values and Monitoring

€ What are your suggestions for a procedure to develop an ecosystem assessment framework and who should be involved in this procedure?

Keep a long range view at all times. Look back at what has been lost in a short time frame and do not continue in the same path.

Look at other ecosystem issues like agricultural chemical use, forestry habits, urban development, sewage treatment along with water and energy conservation in the context of salmon preservation. Some of the apparent costs of salmon protected need to be born by the industries and activities that are causing the damage. Be cautious of the voices of those who will profit handsomely in the short term from ecosystem damage.

€ What do you understand the term “ecosystem values” to mean and how should they be measured?

Ecosystem values are all the services that nature offers, non of which we pay for, our natural capital.

Unfortunately most operate over time spans much greater than a human life. How do we measure the impact on our interior and coastal forests if there is no salmon fertilizer, when this connection was only made in recent years? What is the value of logs going to market compared to a forest absorbing and filtering water as it helps to control flow rates and prevent landslides, not to mention its service to the air?

Strategy 4 - Integrated Strategic Planning

€ How can the range of interests be brought together to collectively develop integrated (habitat enhancement, fisheries, marine area) plans that reflect salmon conservation needs?

Environmental activists have been trying to figure out how to raise awareness of long term impacts on the commons for a long time. Can we somehow put a price on environmental destruction?

€ Stated another way, what organizational structure could be developed to achieve effective long term planning?

If DFO remains the lead organization for salmon and salmon fishery protection, get more people out of the office and onto the ground and the water. People like the CA's and the now expired watershed stewards who help community groups collect habitat and stream data; people who will enforce pollution and habitat destruction laws; people who can monitor catches and punish offenders; people who can collect accurate data on ocean and fresh water abundances to allow for informed decision making. Too much planning, not enough doing. Too much money going into bureaucracy, not enough going into people of action.

€ What comments do you have about the adequacy of the planning process described in Action Step 4.1?

We could spend too much time planning as the stocks continue to be depleted.

€ What comments do you have about the adequacy of the interim planning process described in Action Step 4.2?

€ What would constitute exceptional circumstances under which the Minister of the Department of Fisheries and Oceans might decide to limit activities to avoid losses of wild salmon?

Are we not in those exceptional circumstances right now? If not, we wouldn't be having these discussions.

€ What information would you need in order to understand such a decision?

Give me the numbers.

Strategy 5 - Annual Program Delivery

€ How frequently should the performance of the Wild Salmon Policy be evaluated and who should conduct the review?

Each year's catch numbers, if accurately kept, and the spawning numbers will tell the tale.

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