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Policy and Economic Analysis Branch  
Fisheries and Oceans Canada  
200-401 Burrard Street  
Vancouver BC V6C 3S4

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### **Re. Proposed Federal Wild Salmon Policy**

Dear Mr. Saunders

We are writing to you as a representative voice of wild salmon conservation in British Columbia to express our comments and concerns with the proposed draft salmon policy (December 2004). The Como Watershed Group has been actively involved in the Maillardville/Como Lake area of Coquitlam since 1996. Initially known as the Como Lake Keepers, the group moved towards encompassing the entire Como Creek watershed in order to take a holistic approach to its management and protection. With the support of the City of Coquitlam, this has evolved into a long-term commitment to the community, and its fish and wildlife resources. These remaining natural areas are a vital component to the environmental health of this rapidly urbanizing area of the Lower Mainland. We have been working with local residents, developers and property owners to adopt a strong stewardship ethic through enhancement projects, and interactive community awareness programs.

Our watershed exemplifies the many urban systems and sub-watershed tributaries to the Fraser River flowing through Greater Vancouver. What sets us apart from many of our neighbours is that salmon escapement in our creeks has never been conserved or managed through the purposeful introduction of hatchery stocks. Our ongoing restoration and rehabilitation efforts to sustain our unique local wild population has been conducted with a true intent to protect their genetic diversity and sustainability while protecting the broader and equally diverse values of the many other fish and wildlife species which share this special place. Our little deme has been fingerprinted and is distinct enough to garner its own branch on the genetic tree that makes up stocks from Mission to the Estuary. Our salmon are urban survivors who have managed to hang on through decades of habitat alteration. That should be a testimonial unto itself. Their wild genes are the added bonus. If our stocks were to suffer some catastrophic event, the unique gene pool we provide to the Lower Fraser would be lost forever. We would gladly welcome the development of a policy that would help to protect them.

On the surface the intent and principles of the proposed policy appear to exemplify those very ideals and objectives. However upon further reading, our organization is very disturbed at how application and interpretation of this policy as it stands may actually put watersheds like ours at risk.

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1. Conservation of salmon being myopically defined as “wise use.” The idea that we as stewards and resource managers who have been gifted the responsibility to protect this keystone species and icon of our Pacific Northwest ecosystems consider salmon to be nothing more than an exploitable resource is abhorrent and flies in the face of true conservation biology and science.
2. Of equal concern is the application of such large-scale conservation units for the management of the various stocks, populations and demes. The DFO admits it has serious gaps in its knowledge and understanding of the diversity, linkages and relationships in the many populations of the five main species of salmon it manages. To be consistent with the concept of the precautionary principle that the DFO so explicitly espouses, conservation units should start off as smaller discreet units until we have better understanding of how various salmon populations interact.
3. The policy is quick to point out that this is all about science and protecting biodiversity. Conservation and sustaining biodiversity are about much more than the mathematics of biomass management. What must be inherent in any policy that is truly about conservation is the understanding that natural capital exists for reasons far beyond its “value” to human economies. With that comes the intrinsic responsibility that maintaining natural systems, species and services must have at its foundation the objective that we will conduct our activities through actions, which will do no harm to our living systems.
4. The WSP uses a great deal of science based language, but does little to recognize or incorporate the science surrounding the role that salmon play in maintaining the ecology of their natal systems. The many individual species and broader fish and wildlife communities that are dependent on salmon for their own survival do not appear to be a significant factor in this policy.
5. Perhaps the gap mentioned above has more to do with the fact that this policy appears to be nothing more than making sure enough fish exist in select places to feed the fishing industry. Indeed it appears the focus will be on placating industry through playing a “balancing” act of economics with conservation. Though the “triple bottom line” approach is laudable, there is little to demonstrate how this balance will be achieved. Should it not be the driving principle of the DFO to protect fish and fish habitat first above all else? Is this not the foundation of legislation such as the Federal Fisheries and Species at Risk Act?
6. Even if the DFO took steps to make this policy the more holistic tool it needs to be, does it have the adequate resources for effective delivery and implementation? Based on the recent downsizing, restructuring and shifts in habitat protection, it appears that much will be relegated to a “wait and see” approach. In other words, a shift to results based, back end monitoring, which basically means being even more reactive when things go wrong. Giving the fox the keys to the henhouse, then providing ambiguous policy, vague science and fettered limited support to those remaining to watch the fox doesn’t seem to be an approach that will protect much of anything. Our watersheds and wildspaces are too precious to allow for such a leap of faith.
7. The WSP speaks of stakeholder involvement, stewardship and consultation - but where are the linkages to key initiatives such as the National Stewardship Agenda, the Georgia Basin Action Plan or even more importantly – the involvement of local governments? Much of the direct loss to habitat, conservation and the decisions that affect the sustainability of salmon occur locally. Whether its by site, stream system or landscape, municipal land use decisions are at the core of how many of our watersheds will continue to support viable fish populations. Linked to this are the many stewards, advocates and environmental non-government organizations that work with them. Without explicit integration and support of these players no policy will ever achieve its desired results.

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We are at the crossroads as to whether we are realistically going to protect and conserve the biological diversity of this province and the vital role that wild salmon populations play. There will always be losses and we recognize that resources are limited, sometimes even finite when it comes to protecting the myriad of small watersheds and local fish and wildlife populations across this province.. That is why there are so many local voices now filling the gaps and working to protect our living capital. However, the implications of the present WSP are that such efforts may become inconsequential in the big scheme of large-scale fish production for BC's watersheds. The necessary vision that recognizes conserving the big picture won't happen without considering all the pieces of which it is composed is lacking in this policy. The bottom line is that we still know very little about the diverse make-up of those pieces and the role watersheds like ours play. Now multiply this out to the hundreds of thousands of small streams and sub-watersheds across BC. On behalf of our salmon, we hope that you will strive to develop a policy that truly conserves wildness and really looks to balance out those needs.

Sincerely,



Pamela Zevit  
Conservation & Restoration Coordinator

### ***The Como Watershed Group***

cc

Geoff Regan, Minister – Fisheries and Oceans Canada  
Stéphane Dion, Environment Minister, Canada  
Paul Sprout, Regional Director General - Pacific Region  
Vicki Husband, Sierra Club Canada  
Otto Langer, David Suzuki Foundation, BC  
Craig Orr, Watershed Watch Society, BC  
Rich Chapple, Pacific Salmon Foundation  
Elaine Golds, Burke Mountain Naturalists, Coquitlam, BC  
Board of Directors, The Como Watershed Group

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