



Rebecca Reid
Regional Director
Department of Fisheries and Oceans
Sent via email to rebecca.reid@dfo-mpo.gc.ca

Dear Ms. Reid,

I am writing to you in regards to the chum salmon commercial gill net openings in late October (Fisheries Notice 1182) and the potential for the interception of Fraser late-run summer steelhead by-catch.

Robert Bison, Fisheries Stock Assessment Biologist of the Fish & Wildlife Branch classifies the depressed state of Fraser late-run summer steelhead as being an **Extreme Conservation Concern**. Mr. Bison currently estimates the abundance of Fraser late-run steelhead at 40% of pre-season expectations in his in-season spawner abundance forecast. The forecast 2015 Thompson and Chilcotin steelhead runs represent the lowest stock levels during the time frame these stocks have been monitored. Since 2004, with the exception of 2014, the highest incidence of steelhead bycatch in the Albion Test Fishery has occurred in last week of October. This public stock assessment data indicates that the last week of October is a critical migration time for Fraser late-run summer steelhead. It is imperative that special consideration be given to this distinct run of fish given the current fragility of the stock.

In October 2014, Fisheries Notice 1184 closed the Area E gill net fishery in order to ensure management objectives on Interior Fraser steelhead stocks of concern were achieved. As indicated by Mr. Bison, the Fraser late-run summer steelhead run forecast is lower in 2015 compared to 2014 and yet the gill net fishery is still proceeding. If it were necessary to close the gill net fishery in late October 2014, it would stand to reason that there is comparatively more incentive to close the gill net fishery in late October of 2015.

While it is important to provide economic opportunities for those dependent upon the commercial chum fishery, it is unacceptable that this economic opportunity should come at the expense of unique populations of fish that make up the Fraser late-run summer

steelhead run, particularly given their status of being of extreme conservation concern. Jeopardizing this unique run of steelhead in the name of economic opportunity contradicts the Department of Fisheries and Ocean's mandate to contribute to a clean and healthy environment and sustainable aquatic ecosystems through habitat protection, oceans management, and ecosystem research. By allowing future non-selective openings during the peak migration window for Fraser late-run summer steelhead (i.e. Fisheries Notice 1182), the Department of Fisheries and Oceans abdicates their responsibility to fulfill their mandate.

I implore you take the steelhead stock assessment analysis performed Mr. Bison (Fish and Wildlife Branch) into consideration when considering commercial gill net openings in the lower Fraser River during this peak steelhead migration window. Allowing non-selective fishing methods during this time is unacceptable.

Sincerely,

Ralf Kroning
Vice-President
Steelhead Society of BC

Cc: Mr. Jeff Grout, Regional Resource Manager- Salmon, Department of Fisheries and Oceans

Ms. Lisa Kerr, Director- Salmon, Department of Fisheries and Oceans

Ms. Barbara Mueller, Resource Manager- Lower Fraser Area, Department of Fisheries and Oceans