

Note: This table is intended to provide a high level summary of feedback received on the draft salmon IFMP and highlight areas where there are potential inter-sectoral issues to facilitate discussion. The table is not intended to be a comprehensive or fully detailed representation of the feedback received. For further information, page numbers are provided in the last column for reference to the original submissions in their entirety on specific issues. The Department will be meeting with First Nations to review detailed First Nations comments; however, some comments are included below as they relate to shared issues.

SPECIES	#	IFMP FEEDBACK RECEIVED	IFMP Feedback Pkg Page:
Chinook			
	1	SFAB support the local Victoria Area SFAB committee proposal that continues to meet or exceed the harvest reduction objectives for Fraser River stocks of concerns, reduces the hardship upon the fishery and provides certainty and stability.	196
	2	MCC – concerns that there is little fishery independent data on encounter rates and fishery related mortalities of Fraser <i>Spring 42, Spring 52, and Summer 52</i> Chinook. The IFMP should require that fisheries that impact depressed Fraser and South Coast Chinook stocks have fishery independent monitoring programs in place that would generate scientifically defensible encounter and total mortality rate information.	191
	3	The MCC request that the IFMP include language that identifies precautionary measures and rebuilding objectives for southern BC Chinook salmon.	191
	4	The MCC propose that that management reference points for Fraser Spring and Summer stream-type Chinook be changed so that the terminal run size and probability of rebuilding, are increased.	191
	5	The MCC propose Chinook harvest impacts should assume that FSC harvests will be higher than anticipated due to the expected low abundance of sockeye, and FSC window closures.	191
	6	MCC request that based on current DNA data, recreational fishing for chinook should be closed in Areas 19 and 20 during May, June, and July and request a recreational closure in the “banana” area of Area 29 through to August. MCC request that the recreational effort in Juan de Fuca and Georgia Strait be monitored and restrictions expanded if effort increases over the 2014 period.	191, 192
	7	A-Tlegay request change from retention of 2 chinook/day wild or hatchery to 2 hatchery chinook/day (no retention of wild) for Johnstone Strait (Area 12 &13) recreational fishery. A-Tlegay request chinook be managed to priority access of FNs – increase retention of Chinook anticipated in year of less abundant Fraser sockeye return.	24
	8	Several FNs outline concerns and request that the Chinook Conservation Corridor be closed to all recreational angling and that the corridor be expanded through upper Strait of Georgia for recreational fishery to help protect all Southern BC chinook stocks.	37, 42-43, 75, 79

9	FNs propose a closure of marine recreational fisheries in Area 19 and 20 from May 1 to July 30 th in order to increase abundance of early-timed chinook stocks.	31, 47, 49, 90
10	FNs do not support any proposed SFAB management action changes to the Juan de Fuca chinook fishery.	31, 37, 42, 88, 96, 104
11	FNs do not support recreational management measures that increase the impact to Fraser Spring 52 and Summer 52 fisheries under Zone 1 management, compared to previous years.	104, 108-109,
12	FN's support the review of the chinook management actions pre2012 and thereafter.	37, 43, 47, 49, 99, 108
13	IMAWG concern there is a lack of management actions in JS (Areas 11 to 13) where some of the wild chinook are caught.	42
14	NTC support the 10% ER objective for WCVI chinook in all Canadian fisheries. Data is requested to be presented for meeting this objective by fishery.	75-76
15	LFFA request that in Area 29, the recreation management action of "not retain chinook salmon in Subareas 29-6, 29-7, 29-9, and 29-10 effective March 1, 2016" be changed to "no fishing for salmon".	64
16	The five Nations (T'aaq-wiihak Nations) do not support the DFO imposed 5 nautical mile boundary on fishers or vessels authorized to fish in the T'aaq-wiihak fisheries for chinook salmon.	80
17	FN Forum – propose the regulation of "no retention" be replaced by "no fishing for salmon" in the area known as the "the banana", off the mouth of the Fraser through to August.	37
18	QARS does not support the implementation of the SFAB Juan de Fuca proposal for the 2016/2017 season and suggests that more time be given for the JTWG to review and analyze the proposal.	88
19	UFFCA supports the on-going development of the Chilko chinook indicator program and exploration of a suitable Spring 52 indicator to provide fundamental data to inform management decisions.	109
20	SFC would like a summary of how DFO determines what chinook fisheries are covered by creel surveys (decision making tool) specific to fisheries that impact Thompson chinook stocks e.g., what information is used in the assessment; and the opportunity to provide recommendations and comments.	97
21	FN Forum – request that exploitation rate for chinook FSC be increased given the low expectations for sockeye. Propose a decrease in other fisheries, such as SOG recreational fishery and/or Fraser river recreational fishery and propose annual chinook limits in the recreational fishery be reduced.	37
22	FN Forum – propose that area based licensing needs to be reviewed and additional enforcement and monitoring of recreational fisheries are recommended.	37
Coho		
1	Area B – request that if there is any increased access of ER of IFR coho, it be provided to commercial fleets to prosecute fisheries for more abundant species.	21

2	SFAB – The limit for wild coho is 4 in Areas 21-27 and respecting the current vulnerability of Clayoquot chinook stocks that may be present in Area 24 during August, request that the limit increase (2014) be reversed and that pre 2013 coho regulation be reinstated (2 Coho per day June 1 st to August 31; 4 coho per day, max 2 wild per day as of September 1 st).	196
3	MCC request that recreational effort in San Juan and Strait of Georgia for coho be monitored and restrictions if effort increases over the pre-2014 period. Harvest restrictions on IFR recreational fisheries for coho, in particular, need to be increased to maintain them at 3%.	190-191
4	Cowichan Tribes request that the range of ER should not exceed 5% including North of Cape Caution and terminal harvests.	32
5	Cowichan Tribes request that there be no retention of wild coho from Area 12 through to 20 for the recreational sector, unless the run is assessed terminally in-season that it can support a terminal fishery.	32
6	IMAWG support for 3-5% ER on IFR coho; however, concerns regarding the need for increased protection specifically for the other Southern coho stocks.	43
7	The NTC and five Nations (T’aaq-wiihak) support the ER of 3-5% for IFR coho.	75-76, 81
8	The five Nations (T’aaq-wiihak) do not support wild coho retention opportunities to WCVI recreational harvesters before addressing priority Aboriginal rights-based fishing interests.	81
9	ONA support the approach of 3-5% ER for IFR coho.	170
10	SFC support the ER of 3-5% for IFR coho with terminal fisheries included in the exploitation rate.	97
11	UFFCA support the DFO objective of the pre-2014 IFR coho management.	108
12	UFFCA request that return to the recreational fishery impacts consistent with pre-2014 management or less.	108
13	UFFCA request that management must be in accordance with the long-term objectives of maximizing and escapement of IFR coho to 1000 spawners within each of the 11 sub-populations, including a total return of 40,000 IFR coho upstream of Hell’s Gate.	108
14	QARS support managing IFR coho with pre-2014 management measures.	3
15	QARS request only hatchery marked coho be allowed to be retained in the recreational fishery and that retention not exceed 2 per day due to low status and low productivity of SOG coho stocks.	3
Sockeye		
1	The MCC supports Option 2 with the additional one-week closure to protect Early Summer sockeye. The MCC request the late run LAER be reduced to 10% to reflect the expected very low abundance, and the fact that their escapements in the past two years were much lower than forecast.	192
2	The MCC request the Table on page 281 should be extended to compare expected returns relative to the individual stock’s WSP benchmarks.	192

	3	A-Tlegay support the Option 1 - 20-30% LAER on Late run aggregate, lower fishery reference points.	23
	4	A-Tlegay supports the 3-week window closure, but with a potential seine opening date of July 20 th rather than July 25 th .	23
	5	Cowichan Tribes request that Option 1 be used if the sockeye return is larger than expected run size, otherwise if the forecast is less than Option 2 is requested.	32
	6	Cowichan Tribes request that the Early Stuart window closure be extended by one week to protect the beginning run of the early summers.	33
	7	Cowichan Tribes propose the test fishery in Area 20 be delayed, similar to last year.	33
	8	LFFA support Option 1 for the Fraser sockeye escapement plan.	65
	9	LFFA indicate an additional week window closure will have significant impact on FNs accessing FSC fish.	65
	10	SFC support Option 2 to afford some protection and increased spawners for Early Summer, Summers and Lates returning to the Thompson watershed.	95
	11	SFC supports an additional 1 week closure added on the Early Stuart window closure.	95
	12	SFC supports a late run LAER of 20% across all run sizes for late run sockeye.	95
	13	UFFCA propose a sockeye management approach for planning purposes that blends aspects for Option 1 and Option 2 proposed in the draft IFMP. Additional recommendations are detailed in the letter. Early Stuart – Option 1; include window closure and reduced test fishery regime Early Summer – Option 2 Summer- Variable – Option 1 (if stocks greater or equal to p50 abundance) and Option 2 (if L. Stuart / Stellako returns are less than p50 abundance). Request for inseason stock id work to separate Stellako and Late Stuart.	106-108
	14	QARS support Option 2 to allow a greater amount of fish to reach the spawning grounds.	3-4
	15	QARS propose the LAER at 20% for all returns for a conservative approach.	4
	16	QARS support extending the Early Stuart window closure for one week and reducing test fishing activities during the Early Stuart migration.	4
	17	UFFCA request an ESSR fishery for Upper Fraser sockeye stocks (potentially Chilko, Stellako or Nadina) if opportunity identified this year and subject to further discussion with DFO and required groups, escapement level triggers, harvest plans, fishery monitoring and reporting; and, communication.	110-111
	Pink		
	1	NTC request that pink salmon be indicated as a non-retention species for all WCVI commercial and recreational fisheries in 2016 due to persistent conservation concerns.	78-79, 80

Chum/Steelhead		
1	The Thompson Steelhead Working Group requests that the management of salmon fisheries needs to be responsive to the status of steelhead during times of conservation and extreme conservation concern; limit non-selective salmon fishing opportunities to those times and areas outside the Thompson steelhead migration time and migration corridor; provide selective salmon fishing opportunities in those times and areas within the Thompson steelhead migration time and migration corridor; provide clear quantifiable objectives; identify and include all fisheries that have an impact on steelhead; include First Nations’ use of steelhead in the IFMP.	99
2	SFC request that a collaborative process be established between the Province, DFO and First Nations to develop and method for assessing impact of all Canadian fisheries on IF steelhead and scientifically assessing the methodology and data used.	98
3	UFFCA support the DFO draft objectives of minimizing steelhead impacts in areas outside of natal streams while respecting rights based fisheries.	109
4	QARS concerns re: low chum salmon returns in the Chemainus River and smaller chum bearing streams in the Hul’q’umi’num territory.	86
5	QARS concerns regarding interception of chum bound for Areas 17 and 18 in the Johnstone Strait (JST) chum fishery.	86-87
6	QARS request further discussion regarding Cowichan River chum salmon escapement targets and new method being developed.	87-88
7	FN Forum – request dedicated support and commitment from Federal and Provincial participants for the Thompson Steelhead Technical Working Group to support effective management and recovery of steelhead at a larger scale.	39
Salmon Enhancement Program		
1	MCC request the the proposal to reallocate 200,000 Fall chinook smolts from Quinsam River hatchery to Puntledge River Hatchery be accompanied by an estimate of additional harvest impacts it may impose on IFR coho.	191
2	MCC concerns re Juan de Fuca/Sooke Basin Seapen rearing proposal for chinook – may lead to increased fishing pressure on wild populations, negatively affect such abundance by contributing to adverse ecological interactions between wild and enhanced salmon.	189
3	A-Tlegay request more information on intention and implications of proposed changes regarding “reallocation of 200K fall Chinook smolt production target from Quinsam River Hatchery to Puntledge River Hatchery”.	25
4	SFC requests working collaboratively with DFO in rebuilding the Upper Adams sockeye run.	95

	5	Omega Pacific – Project Submission for the 2016 Salmon Enhancement Program	112-121
Use of Fish Arrangements			
	1	A-Tlegay-Namgis proposal to administer of non-panel water test fisheries.	24
	2	FN FORUM and IMAWG support the A-Tlegay and Namgis test fishing proposal in Areas 12 and 13.	36, 42
	3	The NTC and five Nations (T’aaq-wiihak) concerned about proposed DFO Brooks Peninsula chinook test fishery under a yet to be adopted or revised Use of Fish policy. The NTC propose that the draft “use of fish” policy not be used to implement the proposed Brooks Peninsula chinook test fishery unless all interested parties agree.	78, 81-82
Commercial Salmon Allocation Framework			
	1	The MCC request the IFMP should confirm that all Demonstration Fisheries will require additional consultation involving local or regional First Nations and stakeholders before they are initiated in 2016.	189
	2	The MCC opposes any new Demonstration Fisheries that will potentially increase cumulative total mortalities on Upper Fraser steelhead or IFR coho.	189
	3	A-Tlegay do not support the geographical area and species for the pink and chum assessment fisheries as proposed by Area H.	24-25
	4	The NTC supports the Ditidaht position opposing the Area E proposed fishery for hatchery chinook in Nitinat Lake, pending full consultation and agreement with Ditidaht First Nation on proposed fishery.	79
Fishery Monitoring and Catch Reporting			
	1	The MCC recommends that the IFMP provide a list of the recreational and commercial salmon fisheries to be evaluated by the Risk Assessment Framework and a process be outlined in the IFMP to inform readers of prioritization work, public comment periods and timelines. Guidance and standards of C&P on how it will measure and enforce compliance is also requested.	188
Other			
	1	QARS request DFO begin planning for fisheries at all streams to allow more fish to escape if necessary given the potential for low stream flows and high water temperatures in 2016 with use of management adjustments.	84
	2	Area B concerns about how unresolved issues with Interim Transfer guidelines will be resolved, specifically, transfer arrangements for individual licence holders. See Section 5.2 Proposed Revised Commercial Salmon Transfer Guidelines on page 376.	21-22

Abbreviations

IMAWG – Island Marine Aquatic Working Group

LFFA – Lower Fraser Fisheries Alliance

MCC – Marine Conservation Caucus

NTC – Nuuchahnulth Nations

QARS – Q’ul-Lhanumutsun Aquatic Resources Society

SFAB – Sport Fishing Advisory Board

SFC – Secwepemc Fisheries Commission

UFFCA – Upper Fraser Fisheries Conservation Alliance

ONA – Okanagan Nation Alliance