# **SEHAB: PSSI FEEDBACK**

## SPRING 2025

Burrard Inlet, Indian Arm, Vancouver -

My one comment is they used PSSI funds to hire all staff. Several key SEP positions such as Section Lead, Tech's hired using PSSI money. Now what? Will this money continue? What happens to all the positions filled? If there is no PSSI money given all the focus on economy and jobs caused by US tariffs what happens?

No question PSSI money was critical and is making a difference. However funding needs to continue otherwise all the hard work will be lost.

Smithers & Northwest -

There is too much time wasted creating a barrier between First Nations and recreational fisherman. I have talked with many Elders; they want to see collaboration between First Nations and Caucasians. They feel targeted; it is creating too much negative impact.

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We need to focus on the commercial fleets having less impact on the salmon fishery. Reduce their catch limits and their nets used. Focus on pirated fishing fleets. Also reduce the impact by the Tyhee test sites. Change it to a fish reel as has been done. I am sure they will agree as netting is not allowing the fish to return.

Allow Chinook fishing again on Skeena 6. The reports don't add up. The river systems in BC are open to fishing hatchery which impedes the wild salmon. Skeena 6 needs to be open for 1 retention again. We need to establish hatchery salmon in higher numbers. Taking away these programs on Skeena 6 hurts recreational fishing

While we appreciate the increased support from DFO staff hired with PSSI funds, and the funding boosts to hatcheries, these boosts were restricted to facility upgrades. Hatcheries also need increased support for baseline/operational costs and paying staff.

## Lower Vancouver Island & Southern Gulf Islands -

Thank you for the opportunity to provide input regarding the Department of Fisheries and Oceans (DFO)'s current and long-term work under the Pacific Salmon Strategy Initiative (PSSI).

From our vantage point—as organizations with over three decades of continuous, boots-on-the ground conservation and restoration work in the watersheds and nearshore environments of British Columbia— we offer the following perspective:

#### Observations on PSSI Implementation

While we acknowledge the historic scale of investment under PSSI and recognize the good intentions behind the initiative, we must be frank: little of this effort meaningfully targets the foundational causes of salmon decline *or rebuilding of stocks*.

#### Neglect of Source Control

Urban runoff, failing stormwater systems, aging septic tanks, and marine pollutants are some of the primary, chronic killers of salmon habitat, yet source control remains conspicuously underrepresented in both funding and focus. These are not exciting projects, but they are essential if we hope to move beyond triage. *We have guidelines for discharge that are not being followed. Streams with water should be protected.* 

#### Minimal Action on Marine Debris and Abandoned Vessels

Our decades-long work removing abandoned vessels and marine debris has direct links to salmon recovery through forage fish habitat restoration. Species like Pacific sand lance, which are foundational to the Chinook diet (and by extension, the survival of the Southern Resident Orca); depend on clean, undisturbed nearshore zones. These habitats are routinely destroyed by derelict vessels and toxic leaching, yet such work is treated as peripheral or classified as "non-core."

#### Feel-Good Projects over Functional Change

Many funded projects appear to be low-impact, short-term initiatives designed to appear active rather than structurally address systemic failures. We are witnessing the rise of make-work ecology rather than a coordinated, results-oriented job creation program rooted in ecosystem function and community resilience

#### Long-Term Strategic Concerns -

## Hatchery Dependence Masks Deeper Decline

Continued investment in hatcheries, without parallel investment in habitat function and water quality, is a dangerous substitution. Hatcheries should not be used as a substitute for habitat loss mitigation, not as political cover for failing to confront entrenched land use issues.

## Insufficient Climate Adaptation

DFO's current planning does not adequately incorporate climate change adaptation at the watershed scale. Watershed reforestation, stream shading, urban heat island mitigation, and groundwater recharge must be core tenets of any salmon survival strategy in a warming world.

#### Lack of Career-Scale Conservation Jobs

Funding structures favour fragmented, one-year project cycles that generate administrative churn and volunteer burnout rather than long-term, community-rooted job creation in habitat

protection and source control. We need skilled labour in watershed maintenance and marine ecosystem restoration, not just seasonal photo ops.

Recommendations for Recalibration:

- Elevate source control as a central PSSI pillar—address urban and rural runoff, septic systems, and stormwater infrastructure head-on.
- Recognize derelict vessel and marine debris removal as legitimate habitat restoration. Fund it accordingly.
- Tie PSSI goals explicitly to forage fish recovery, especially sand lance and surf smelt, to connect nearshore work to salmon and orca recovery.
- Shift toward long-term funding models that support stable, skilled careers in habitat protection and restoration.
- Fund monitoring and evaluation that measures ecological function, not just dollar throughput or social engagement metrics.

## Final Thoughts

We remain committed to salmon recovery—not as a campaign slogan, but as a lived practice. But salmon do not spawn in spreadsheets. They do not feed on vision statements. If the habitat is gone, and the water is poisoned, and the food web is broken, no amount of hatchery fish or photo-ops will save them.

We urge DFO and PSSI administrators to prioritize function over façade, and to invest in the quiet, critical work that actually keeps salmon alive.

Just a comment on the Cowichan successful rebuild from escapement less than 1000 Chinook 2 decades ago to the current 10s of thousands.

Why has DFO done nothing to reward this local case study of successful stock recovery? The Chinook fishery is still closed. The DFO bureaucracy cost could be offset through economic openings especially the recreation fishery. DFO has lost its way. It has to stop crying wolf and the sky is falling, and figure out how to reward and encourage the next generation.

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Increased and protected salmon habitat results in an increase of salmon stocks: Our biggest roadblock to reverse the decline of salmon is rejections of projects to increase, enhance and expand

The extended PSSI efforts are great and they really help small hatcheries make a difference. Please extend financial coverage for the salmon DNA analysis at the DFO Molecular Genetics lab. We will be sending in around 20 - 30 fin clips from Chinook of unknown origin this year and the cost about \$30.00 each to analyze. As well, we will be doing some E-DNA sampling and are having problems locating a lab to do the analysis as our DFO lab is not yet set up or is in the process of setting up for E-DNA work

habitat by removing log jam and gravel overburden/fish passage barriers. Working with MOTI we were able to do one in stream project last year while we had other potential projects to enhance and improve capacity/habitat declined by Provincial Water Sustainability Act (WSA) Department Authorization Specialists. Reasoning s such as "We do not know what would happen if you removed that barrier to fish passage" and "Log jams that become barriers to adult fish passage are part of the natural LWD". Well excuse me because both the MoTI biologist and I know very well which barriers are problems and which are not. One government employee had to ask about the aerial footage images to which direction the water is flowing? Now it is my opinion: that person needs to spend more time in the field. They asked us to draw arrows on the drone images to show which way the water is flowing...so we did.

Keep up the good work with PSSI and please speak to WSA folks about projects that protect existing habitat from potential damages and projects to remove barriers to adult fish passage are likely sound when coming from professionals who have been "working in stream" for decades.

Sunshine Coast -

In 2021 the announcement and funding of the Pacific Salmon Strategic Initiative was a much welcomed program. It focussed on the four pillars of salmon enhancement, harvest transformation, conservation and stewardship and integration & collaboration. These pillars were to be guided by 5 guiding principles: reconciliation with Indigenous peoples; innovative solutions, prioritization of critical salmon populations; enhanced transparency, data and trust; and partnerships and collaboration.

Four years into this novel program, what has been achieved viewed from this particular community-focussed lens?

Certainly the review and modernization of community hatcheries under the pillar of salmon enhancement has made great strides with a full complement of Community Advisors and technical staff. With the publication of the Facilities Management Plan the infrastructure portion of the review may almost be complete with the exception of addressing the issue of provincial water licences and payment for water usage.

With respect to the conservation and stewardship pillar, the Stewardship Directorate got off to a slow start and the very few front line staff (Stewardship Coordinators) are only now becoming familiar with their communities that they are advising. Much remains to be done here and certainly warrants a PSSI Phase II. *PSSI needs to be able to recruit and retain staff who require clear job descriptions, introduction to the existing programs and current staff*.

Reconciliation with Indigenous peoples has really moved forward and is of course legislatively (UNDRA) required. However in pursuing this principle, many non-indigenous stewards and hatcheries be are concerned that PSSI has failed to "enhance its transparency" or trust in sharing the reconciliation path with this community of non-indigenous volunteers. As an example, the very significant shift-changing tripartite Agreement signed in 2024 between DFO, First Nations Fisheries Council and the Province with

respect to salmon recovery and stewardship has not been publicized nor its' possible effects explained by staff.

Nonetheless there should be a PSSI II to facilitate this new agreement into action. In addition, there needs as ever to be work done on collaboration between the differing federal ministries and programs, the provincial and local governments. This (in addition to communicating with the volunteer community and First Nations) is what the Stewardship Directorate should be doing which will need more staff to accomplish.

Two other components that should be added/emphasized in PSSI II are <u>Habitat Restoration</u>, specifically the Salmon Restoration Centre of Expertise and increased <u>Fish & Fish Habitat Protection</u>. For the former, the with the draft of the Salmon Restoration Priorities Plan almost finalized, this major policy direction needs to disseminated to the appropriate First Nations, all levels of government and the community hatchery and stewardship groups.

As to the latter, most of the public is well aware of the need to protect salmon and their habitat and they expect DFO to protect these iconic species. The enforcement of the Subsection 36(3) *deposition of deleterious substances* should be returned to the Fisheries Officers from Environment Canada officers who currently enforce it. Secondarily, there needs to be increased funding for FFHP to collaborate more closely with the provincial Ministry of Water, Lands and Resource Stewardship e.g. Riparian Area Regulations. Thirdly, there needs to be a change in attitude from DFO to lay charges regardless of the perpetrator e.g. sewage spills by municipalities, violations of Environmental Conditions from projects assessed under the Canadian/BC Assessment Act and run-of-the-mill land developers. This would require increased funding to hire additional enforcement staff to lay charges and proceed to court as needed.

Haida Gwaii -

There is a concern about the dual role of Community Advisors in remote areas serving both as a point of contact to community hatcheries and to stewardship groups and what would happen to these positions should there not be a PSSI II. See letter from Tlell Watershed Society (December 04, 2024) and SEHAB response letter dated January 21, 2025.

Many of the hatchery volunteers are also the stewardship community. Having one point of entry to DFO (the CA) works as long as the CA is able to get help from other departments

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