



Phone: (867) 393.6725

Email: ex.dir@yssc.ca

Mail: Box 31094, Whitehorse, YT, Y1A 5P7

Office: 2nd floor, 409 Black St., Whitehorse

Honourable Diane Lebouthillier
Minister of Fisheries, Oceans and the Canadian Coast Guard
Minister's Office
200 Kent St
Station 15N100
Ottawa ON, K1A 0E6
DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca

February 20, 2025

RE: October 2024 Fish Stranding Event from Whitehorse Rapids Generating Station

Dear Minister Lebouthillier,

The Yukon Salmon Sub-Committee (YSSC) is established under the Umbrella Final Agreement and subsequent First Nation Final Agreements as "the main instrument of Salmon management in the Yukon". Section 16.7.17.12.a states that the YSSC may recommend to the Minister policies for the management of salmon and their habitats.

The YSSC was notified that the Whitehorse Rapids Generating Station (WRGS) resulted in numerous fish stranding and mortalities on October 8 and 9, 2024. While a fish salvage was conducted, from reports, it is very likely that many of the stranded fish were not recovered and only a fraction of mortalities were recorded. We also know from fish salvage operations related to the Yukon Queen in the Dawson area, that once stranded fish stop moving or "flopping" on the rocks, they become impossible to locate. As such, we anticipate that mortalities exceeded the reported 761 fish, including 1 juvenile Chinook salmon.

In addition to the fish stranding, we are also concerned for the spawning Chinook below the WRGS. If water levels were below these redds, the incubating Chinook eggs would not survive being dewatered for 12 hours. This would be unacceptable given that Canada just signed a 7 year agreement with the United States to rebuild Yukon River Chinook (<https://www.pac.dfo-mpo.gc.ca/fm-gp/salmon-saumon/yukon-chinook-agreement-quinnat-accord/index-eng.html>). This agreement includes a clause that the countries will work collaboratively to improve habitat. A dewatering event is the opposite of this. Alaskans are making increasing sacrifices that are resulting in less food on their tables as are Yukon First Nations. Out of respect for this agreement and salmon, we **recommend that Fisheries and Oceans Investigate the incident to see if it violated the Fisheries Act.**



Phone: (867) 393.6725

Email: ex.dir@yssc.ca

Mail: Box 31094, Whitehorse, YT, Y1A 5P7

Office: 2nd floor, 409 Black St., Whitehorse

We also have the following recommendations specific to the site:

1. Update WRGS' flow reduction ramping procedure

More people and buckets need to be at each location so that all stranded fish can be saved. If the crew is overwhelmed by the number of stranded fry, as occurred in the most recent occurrence, then the priority should be placed towards saving the fish and counting of salvaged fish should be dropped. If not previously done, it should be confirmed that there is no fish stranding prior to the fry salvage being initiated (above 9.3 cms/hr) under several different conditions.

2. Seek additional support for the fish salvage

We are fortunate that there are many fish partners in the Whitehorse area. When planning a low flow ramping event, additional help can be sought from multiple partners. Yukon First Nations (specifically Ta'an Kwäch'än Council and Kwanlin Dün First Nations), the YSSC, the Yukon Fish and Game Association, the Yukon First Nation Salmon Stewardship Alliance, numerous not for profits and the general public. Many of these organizations have knowledgeable and dedicated individuals that could support a larger fish salvage.

3. Redd preservation

As this event is needed yearly to remove the fish screens, every year Chinook redd surveys should occur from the WRGS to the confluence with the Takhini River. The redd location and depth should be recorded. During the low flow ramping event, these redds should be monitored and if water levels drop below the top of the redd, mitigation should be employed to ensure that the eggs are not dewatered. It is anticipated that the depth of the redds will change yearly with changes in water levels at time of spawning but also with condition of the Chinook (shallower redds with decreasing energy reserves).

Should you require further information or clarification, please contact Taylor Bradley, Executive Director of the YSSC at ex.dir@yssc.ca or 393-6725.

Sincerely,

Elizabeth MacDonald

Vice Chair, Yukon Salmon Sub-Committee

CC: Steve Gotch, Senior Director, Pacific Region
Bill Waugh, Director, Yukon and NW BC Transboundary Rivers Area