

From: Fraser Valley Angling Guides Association [mailto:fraservalleyanglingguides@gmail.com]
Sent: Wednesday, January 24, 2018 1:18 PM
To: OfficeofthePremier, Office PREM:EX
Cc: de Jong.MLA, Mike LASS:EX; gibson.MLA@leg.bc.ca; Martin.MLA, John LASS:EX; D'Eith.MLA, Bob LASS:EX; Throness.MLA, Laurie LASS:EX; Polak.MLA, Mary LASS:EX; Coleman.MLA, Rich LASS:EX; Tegart.MLA, Jackie LASS:EX; Minister, FLNR FLNR:EX; Sheldan, Tim FLNR:EX; Short, Charles J FLNR:EX; Johnsrude@gov.bc.ca; Barrett, Scott FLNR:EX; Pearson, Monica FLNR:EX; Stoddard, Erin M FLNR:EX
Subject: Fraser River Sturgeon Spawning Closures

Dear Premier

The Fraser Valley Angling Guides Association is writing you today in reaction to measures being advocated by the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, (FLNRORD) Fish and Aquatic Wildlife Resources Division. You may not be aware that the Fraser River has a catch and release White Sturgeon fishery that is seen as a model of sustainable fishing for many other fisheries around the world. The Angling Guides have played an important role in managing this fishery by collecting data for the Fraser River Sturgeon Conservation Society to ensure that biologists including those employed by FLNRORD have the data they need to make informed decisions about this incredible animal.

For the last 10 years we have worked closely with the Ministry to ensure that best handling practices are developed and followed. We also provide eyes on the river to help enforcement officials catch poachers and unlawful activities. We have cooperated with FLNRORD on all initiatives including the closure of specific areas of the river during specific periods to accommodate spawning sturgeon. We have done this even though there is no verified scientific studies indicating that catch and release harm spawning sturgeon or that spawning sturgeon even bite on bait during the spawning season. We were promised by the Ministry that as long as anglers voluntarily avoided these "closed" areas of the river closures would not be formally regulated. While over the years the closure sites have increased, again with scant evidence of spawning fish, we have complied. Now the Fish and Aquatic Wildlife Resource Division is threatening to once again increase the areas of closure effectively turning the entire river from Mission to Hope into a spawning zone and in contradiction to previous commitments regulating the closures.

We find this step unacceptable and are looking to the Province to ensure closures remain voluntary and are limited to spawning areas that show a preponderance of evidence that substantial spawning is taking place.

We appreciate your time and consideration in looking into this issue which the attached letter describes in more detail.

Sincerely

The Directors of the Fraser Valley Angling Guides Association.

From: OfficeofthePremier, Office PREM:EX
Sent: Thursday, January 25, 2018 11:13 AM
To: 'fraservalleyanglingguides@gmail.com'
Subject: FW: Fraser River Sturgeon Spawning Closures

Hello, and thank you for your email regarding the Fraser River sturgeon spawning closures. We appreciate your taking the time to write and will be sure to share your correspondence with Premier Horgan at the earliest opportunity. This is just a note to let you know that your correspondence has been shared with the Ministry of Forests, Lands, Natural Resource Operations Rural Development. Please be assured that the appropriate ministry official will follow up with you directly regarding this matter at their earliest opportunity.

Again, thank you for writing. We do appreciate hearing from you.



January 22, 2018

The Honourable John Horgan, MLA
Premier of British Columbia
Langford – Juan de Fuca Community Office
122 – 2806 Jacklin Road
Victoria, BC V9B 5A4
premier@gov.bc.ca

Subject: Fraser River Sturgeon Spawning Closures – sent by Email

Dear Premier

The Fraser Valley Angling Guides Association (FVAGA) is writing to express our disappointment and deep concern with the new discussion of regulated closures regarding the White sturgeon voluntary spawning area closures on the Fraser river. The scheduled February SCAAT meeting clearly singles out and identifies regulated sturgeon spawning closures on the agenda as its own item. It is apparent the Ministry is now proposing to regulate these spawning closures, and is going back on the Ministry representative's word.

This proposed regulation directly opposes the words of Erin Stoddard, the Surrey office-based provincial government biologist in charge of white sturgeon. Mr. Stoddard has stated on several occasions that the current voluntary closures would remain voluntary as long as there was compliance, and has frequently used regulated closures as a threat to comply. Voluntary closures and threats of regulated closures were obviously used to effectively get a "buy-in" from anglers despite strong objections that the evidence for closures were weak in many instances. Our membership has seen excellent compliance in regard to following the voluntary closures, even with the continued expansion of closed areas and the lack of notification to many recreational anglers. If the angler's words cannot be taken as fact, the Ministry could easily check with its' enforcement division and consult with Federal fisheries officers that regularly patrol the Fraser river.

It is worth noting again, that many of these closed areas are based using scant evidence. In addition, First Nations gillnetters continue to net these very same areas that sturgeon anglers are not permitted to angle in. It is common knowledge that gill nets cause a high sturgeon mortality. We also do not know if pre-spawning fish actually engage in feeding in or around spawning areas. There has been no science shown to prove otherwise. In fact, the 1996 – 1998 Fraser River White Sturgeon Spawning study was conducted to locate, capture and radio tag adult, pre-spawn sturgeon, particularly gravid females. Hundreds of fish were captured over the extensive two year program, using many anglers and angling guides that expertly know the river and techniques, but only ONE gravid female sturgeon was ever captured. It was captured in October and not during spawning season. The ever so wide, sweeping and so called "precautionary principle" is used to cover inadequate scientific evidence, but only for one sector again, as usual. It blatantly appears the Ministry will always choose to pick the easy low hanging fruit on the tree, instead of dealing with the issues that are known to be a real problem.

The FVAGA membership and recreational angler has been providing capture and tagging data for the Fraser River Sturgeon Conservation Society (FRSCS) since the society's inception on a volunteer basis. Sturgeon anglers are completely focussed and committed to the conservation of White sturgeon on the Fraser river but can only follow the Ministry's recommendations that are based on solid scientific conclusions and not on weak data or assumptions, while other user groups continue on with business as usual.



The Ministry has obviously chosen once again, to point the finger of all sturgeon ailments clearly at angling. Declining numbers should be attributed to lack of knowledge and science, habitat loss, gill-nets, in-river dredging and gravel removal, floodplain and near shore development, and lack of food sources such as salmon and eulachon. It can also be clearly argued that the lack of juvenile fish numbers can be attributed to the lack of targeted angling and subsequent tagging for juvenile sturgeon.

The FVAGA is willing to accept sturgeon spawning closures on a voluntary and non-regulated basis, and only where there is substantial and conclusive evidence. Closing portions of the river to angling based on one empty egg case or one larvae is certainly not scientific evidence that suggests the area is used for spawning purposes. Closing portions of the river and calling them "pre-spawn staging areas" because fish are seen on a sonar is also, not scientific and conclusive evidence the fish seen are indeed pre-spawn sturgeon. Currently there are some voluntary closure areas that are based on minuscule and inconclusive evidence – the FVAGA does not support those area closures.

Anything more than voluntary closures will result in further action against the Ministry responsible.

Sincerely

The Directors of The Fraser Valley Angling Guides Association

cc Michael de Jong, Q.C., MLA Abbotsford West mike.dejong.mla@leg.bc.ca
Simon Gibson, MLA Abbotsford-Mission simon.gibson.MLA@leg.bc.ca
John Martin, MLA Chilliwack john.martin.MLA@leg.bc.ca
Bob D'eith, MLA Maple Ridge-Mission bob.deith.MLA@leg.bc.ca
Laurie Throness, MLA Chilliwack-Kent laurie.throness.MLA@leg.bc.ca
Mary Polak, MLA Langley mary.polak.mla@leg.bc.ca
Rich Coleman, MLA Langley East rich.coleman.mla@leg.bc.ca
Jackie Tegart, MLA Fraser Nicola jackie.tegart.MLA@leg.bc.ca
Doug Donaldson, MLA Minister of FLNRORD FLNR.Minister@gov.bc.ca
Tim Sheldon, Deputy Minister FLNRORD tim.sheldon@gov.bc.ca
Charlie Short, Executive Director, Regional Operations, Charles.Short@gov.bc.ca
Allan Johnsrude, Regional Executive Director, South Coast Johnsrude@gov.bc.ca
Scott Barrett, Director Resource Management Scott.Barrett@gov.bc.ca
Monica Pearson, Acting Section Head Fish & Aquatic Wildlife Resources
Monica.Pearson@gov.bc.ca
Erin Stoddard, Ecosystem Biologist, Erin.Stoddard@gov.bc.ca