



BC Federation of Fly Fishers

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February 11, 2016

Honorable Steve Thomson
Minister of Forests, Lands, and Natural Resource Operations
PO BOX 9049 STN PROV GOVT
Victoria, BC

Dear Minister Thomson:

Re: Kispiox River Concern

The BCFFF has recently become aware of a troubling proposal to increase guided rod days on the Kispiox River in particular and perhaps other rivers in the Skeena Region. As explained to us, a prominent US based angling guide who already owns and operates five separate angling guide accommodation facilities in this province as well as the rod day quotas associated with each is attempting to circumvent the intent of the classified waters regulations to secure angling guide privileges on the Kispiox. We understand this relates to the specific regulation (The Angling and Scientific Collection Regulations or BC Reg 125/90) listing the number of rod days and angling guide licenses as 393 and 4 respectively. These numbers had their origin in the three-year period leading up to enactment of those regulations in 1990. At the time the 393 was a clearly verifiable number whereas there was some doubt whether it applied to four guides or three. In the fullness of time we understand three was determined to be the appropriate number but the schedule in the regulations was never adjusted to reflect that thinking.

The numbers listed in BC Reg 125/90 apply to the entire year, not just the months when the rivers were classified and restricted in terms of the number of guided rod days. To open the door to additional guides on the Kispiox (or any other classified water when there are no guided rod day restrictions) would be a worst case scenario and set a precedent.

The information available to us at present indicates a fiercely entrepreneurial guide has found the discrepancy in the regulations and is now attempting to impose himself on yet another of BC's world class classified waters. Whereas he cannot qualify for rod days during the restricted months of September and October, he is obviously attempting to end run any consultative or public engagement process to secure guiding privileges in November and possibly August. Given that there are no restrictions on the amount of guiding that is

permitted in these shoulder months it is entirely predictable that the outcome would be even more guiding than a fully subscribed Kispiox River already endures. Conversation with local Kispiox Valley guides and residents confirms their level of concern over this potential.

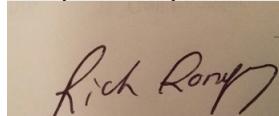
Minister Thomson, please understand that the suite of regulations involved (i.e. 125/90) had, at their core, the preservation of quality angling for residents on the variety of Classified waters. We suggest that this intent has been less than successful in the post implementation era, but the actual number of angling guides on any specific classified water has been upheld continuously.

We implore you to take immediate action to reject any such proposal. The logical step is to amend the Kispiox figures in Schedule A of BC Reg 125/90 to read 3 guides and 393 rod days. We would also recommend redefining the classified period on the Kispiox and all the other summer steelhead supporting classified rivers in the Skeena Region to include the months of November and August. Whereas, September and October were the only months that users demanded be addressed in the early years of 125/90, climate change continues to delay and minimize the influence of winter conditions that once deterred angling beyond those months. Not so today. November, once the only time residents could escape oppressive competition from guided and non-guided non-resident anglers, has become highly attractive and marketable. Both of those groups are quick to seize the moment given there are no rod day fees payable by guides and no daily classified waters licenses required for anyone, guided or otherwise outside September and October. Spreading the rod day quotas now in place for those two months would, over the longer classified period, prevent further confusion of the original intent of the classified waters regulations.

We have observed that Quality Skeena angling is deteriorating. Angler use is fast exceeding what the original objective of the Quality Waters/ Classified Waters process intended. If action is not taken now, Skeena steelhead angling as the world has appreciated, will be gone.

We would like a meeting with you and your staff in the very near future, at any mutually convenient time, to further discuss our recommendations. We hope that our concerns will be given serious consideration.

Respectfully,



Rich Ronyecz
President, BCFFF
cc BCFFF Board, SSBC

