



Debra Sneddon
Resource Manager, Recreational Fisheries
Fisheries and Oceans Canada
Resource Management
100 Annacis Parkway, Unit 3
Delta, British Columbia V3M 6A2
Canada

Dear Ms. Sneddon

This letter sets the Fraser Valley Angling Guides (FVAGA) review and response to the draft 2010 Integrated Fishery Management Plan (IFMP) Appendix 10. We have reviewed these proposals as professional fishing guides who are on the river daily and using two of DFO's stated objectives:

- ❖ **Recreational Sector Salmon allocation** - According to DFO's "Allocation Policy for Pacific Salmon", after FSC fisheries, the recreational sector has priority to directed fisheries for Chinook and Coho salmon. For sockeye, pink and chum salmon, the policy states that recreational harvesters be provided predictable and stable fishing opportunities.
- ❖ **Commercial Demonstration fisheries** - The objective of DFO in relation to the Pacific Integrated Commercial Fisheries Initiative (PICFI) is to "achieve environmentally sustainable and economically viable commercial fisheries, where conservation is the first priority and First Nations aspirations to be more involved are supported". At the same time

The FVAGA in reviewing the 2010 draft IFMP had two general concerns with PICFI as it is currently being implemented through demonstration commercial fisheries and several specific issues with the 2010 plan.

General Concerns

Reduction to usable Recreational Fishing sites – many of the current proposals flowing out of the PICFI process are leading to demonstration commercial fisheries in-river and at terminal locations. As these commercial fisheries grow they encroach on locations that are currently used by recreational fishers leading to frustration and confrontation. While marine commercial fishing



does not lead to this kind of problem, in-river commercial fishing given the restricted space of river systems makes conflicting use of fishing sites unavoidable. The current plans in the 2010 IFMP do not address this issue.

Reduction to predictable and stable fishing opportunities – DFO's allocation policy promises recreational fishers predictable and stable fishing opportunities. The movement of commercial fisheries into river systems and lakes negatively impacts this goal. In addition to reducing the locations that can be fished, commercial fisheries have a negative impact on the overall recreational fishing experience. Fishing up river from a commercial beach seine is basically fishing without any hope of catching a fish. In addition the aesthetics of commercial fishing operations are extremely unattractive because of garbage, fish remains, etc. creating a less than attractive message for visiting anglers.

Specific Issues

5) Area D Gill net Johnstone Strait Chum Effort-Share Based Demonstration Fishery.

Chum runs on the Fraser have been on the decline for the past few years yet each year there is increased commercial effort on Chum, ie: Beach seine fishery in the Chilliwack area and Harrison Chum near the confluence and commercial fishing below Mission. The Vedder River has had low returns the past few years with a no retention for recreational fishers scheduled for the 2010 season. Given the ongoing abundance issue the FVAGA believes that DFO should err on the side of conservation in calculating and allocating any TAC.

7) Area E Gill net Chum Beach Seine Demonstration fishery

The Fraser River between Mission and Surrey has few locations for the public to access shore fishing. Duncan bar has been used as a recreational fishing site for many years. River road runs along side with easy access for seniors, disabled and all other anglers. Duncan bar has washroom facilities for the public and should remain a recreational fishing site. This site is used year round. There are many other locations that can be used for demonstration fisheries, for example: just 1 mile down river from Duncan bar at the bottom of Crescent Island there is a long beach that is rarely used by recreational fishers. This location would be much more suitable and less likely to cause confrontation.



13) 2010 Harrison-Fraser River Demonstration Fishery

FVAGA's concern with this fishery is the high probability of conflict between demonstration fishers and recreational fishers. Before any licenses is handed out, there must be a clear plan to avoid conflict. Fishing site locations should be chosen carefully and respectfully so not to interfere with recreational anglers. There should be a process put in place to ensure that sites are reviewed and preapproved by all involved parties.

To conclude, the FVAGA believes that PICFI has not adequately considered the negative impact and displacement of recreational fishers caused by in-river commercial fisheries. In addition while we are not against Commercial fishing in principle we are extremely concerned as to its potential negative impact on conservation efforts.

The Fraser Valley Angling Guides Association supports DFO's focus on conservation and continues to educate its members and many thousands of clients on the importance of conservation. While our passion is fishing, our livelihood and our positive impact on the local economy depend on a healthy and sustainable fishery.

Sincerely

Robert Reyerse
Executive Director
Fraser Valley Angling Guides Association