Fish and Wildlife Section Head Decision: SFAC Regulation Proposal

**Proposal Title:** SFAC16-1-Lachmach River- No Fishing Sept. 1-Oct 31 mirror order repeal.

**Proponent:** MoFLNRO – Skeena RMD - F&W - Fisheries Section

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**Proposed Regulation Change:**
Rescind the No Fishing Sept 1-Oct 31 Water-specific angling regulation on the Lachmach River.

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**Summary of issue(s) proposal is to address:**
From the late 80’s through to the late 90’s, the Lachmach River was managed by DFO as a North Coast Coho status index stream. In April 1987, at DFO’s request, B.C. prescribed a No Fishing regulation on the Lachmach River from Sept.1-Oct. 31 to complement DFO’s zero (0) harvest quota for Coho for that watershed. This approach to the two agencies regulation harmonization is often referred to as a “mirror order”. This provincial mirror order regulation would reduce an anglers ability to state, if encountered by enforcement officers, that they were fishing for non-Coho species (e.g. Cutthroat, Dolly Varden) but would actually be intentionally and/or incidentally catching (and ultimately impacting) Coho on the index stream.

After DFO decided that the Lachmach R. would no longer be managed as a North Coast Coho index stream, the harvest quota for Coho on the Lachmach increased from 0/day to the Region 6 Waters quota of 4/day (1 > 50cm). However, despite the change a request by DFO to remove BC’s no fishing “mirror order” was never received by the Skeena Region. The result has been that the mirror order has unintentionally remained in regulation, and in the *Freshwater Fishing Regulation Synopsis*, from 1987 to present.

In 2015 a formal request was made to the Skeena Region Fisheries Section by DFO’s North Cost Recreational Fishery Manager (John Webb) to remove the No Fishing Sept.1-Oct. 31 mirror order regulation on the Lachmach (see attached communications). Accordingly, a regulation change proposal was presented to the Skeena Region’s Sport Fishery Advisory Committee (SFAC) on March 20, 2016. The SFAC Committee was unanimously in support of the proposal which in part forms the rationale for this Variation Order Proposal.

If the No Fishing Sept 1 to Oct. 31 regulation is rescinded there would be an increased opportunity to angle for finfish other than salmon in the Lachmach River for that period. In addition, stakeholder confusion regarding no fishing regulations on the Lachmach will be alleviated.

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**Regulatory/ Policy Impediments: (list & provide details)**
**Existing Regulation & Justification Summary: (may include biological comments)**

In April 1987, at DFO’s request, B.C. prescribed a No Fishing regulation on the Lachmach River from Sept. 1-Oct. 31 to complement DFO’s zero (0) harvest quota for Coho on the Lachmach River. This provincial mirror order regulation would reduce an anglers ability to state, if encountered by enforcement officers, that they were fishing for non-Coho species (e.g. Cutthroat, Dolly Varden) but would actually be intentionally and/or incidentally catching (and ultimately impacting) Coho on the index stream.

**Management Considerations: (summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)**

The status of both the trout and char populations in the Lachmach is unknown. With the regional harvest quota that applies to these species of special concern, in addition to maintaining the bait ban, the risk of angling associated impacts to fluvial trout and char populations are likely reduced enough to provide an appropriate precautionary approach to their management.

**Available Options: (where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)**

The No Fishing prescription could be left in regulation as anglers could still technically angle for, and harvest, Lachmach Coho. However, this approach will continue to confuse anglers as the provincial No Fishing regulation in the Synopsis states No Fishing. It does not state No Fishing for finfish other than salmon.

Leaving the regulation as is will continue to restrict the angling season and likely the total harvest of fin fish other than salmon (i.e. Cutthroat Trout).

**Summary of SFAC Issues and Concerns:**

The proposal to repeal the Lachmach River mirror order was unanimously supported by the Skeena Sports Fish Advisory Committee members (March 20, 2016 meeting).

**Regional Fish and Wildlife Section Head Decision:**

This submission is approved as proposed and a Variation Order should be submitted to the Provincial Fisheries Manager as soon as possible.

**Signed by:**

Troy Larden  
Fish and Wildlife Section Head  
Date: 2017-02-07
Appendix I. Regulation Change Request From Federal Recreational Fisheries Manager

From: Webb, John [mailto:John.Webb@dfo-mpo.gc.ca]
Sent: Monday, July 27, 2015 5:04 PM
To: Lough, Jeff C FLNR:EX
Cc: Beere, Mark C FLNR:EX; De Gisi, Joe FLNR:EX; Hirshfield, Paddy FLNR:EX
Subject: RE: Lachmach river

Hello Jeff,

Thank you again for looking into the Lachmach river closure, and providing me with the information.

As it stands right now, the Lachmach River is open for Coho salmon fishing, except from November 1st to December 31st. The daily limit for Coho is 4, with only 1 over 50 cm. Would you please consider removing the Provincial no fishing closure for non-salmon species, from September 1st to October 31st, as I understand that this was a mirror order to a DFO closure for Coho salmon. I understand that you will have to present this to the Provincial Sport Fish Advisory Committee for review next spring.

Thank you for your assistance with this matter.

John Webb
Recreational Fisheries Manager
Fisheries & Oceans Canada
417 - 2nd Ave West, Prince Rupert, BC, V8J 1G8
250 627-3409
John.Webb@dfo-mpo.gc.ca
Proposed Regulation Change:
As submitted the proposal had three parts which were presented as options:

1. Set a restriction on hook size for spoon fishing during times of river occupancy by steelhead adults so that there is minimal chance of the hook penetrating into a fish's eye or gill plate; or

2. Ensure that spoon hooks are trailing hooks to minimize eye penetration (the hook is not leveraged into the eye but able to stay in one place due to its inherent flexibility of spoon attachment); or

3. Restrict the use of spoons for steelhead fishing.

Summary of issue(s) proposal is to address:
The proponent asserts that "hardware gear fishermen (using spoons) are disproportionately injuring and killing adult steelhead in Skeena Region rivers [...] largely due to the large hook size, even though they are barbless [...] the larger supplied hook that comes with the lure has a greater tendency to penetrate into the fish's gills internally (throat hooked), or extending beyond the lip and damaging/blinding one eye of the fish."

The proposed regulation change is intended to reduce the probability of recreational angling causing injury or death of steelhead, by regulating the design of spoons or restricting the use of spoons, on steelhead-bearing rivers during the times that steelhead are present.

Regulatory/Policy Impediments: (list & provide details)
The authority delegated to the Province for recreational fisheries management lies within Part V (Fishing for Fin Fish other than Salmon in Non-Tidal Waters) of the BC Sport Fishing Regulations, 1996 within the Fisheries Act. As currently formulated, Section 63 (Method, Gear and Bait Restrictions) does not provide a definition of spoons as an angling method or gear, and thus cannot allow the regulation of that method by Variation Order. The method of attachment of a hook (trailing, as described in the proposal) is also not defined and not restrictable.

Changing language in the BC Sport Fishing Regulations requires a federal Order In Council (S. MacIver, Sr. Regulation Policy Advisor, FLNRO). Any proposal to change language in the BC Sport Fishing Regulations would be submitted from the Director of Fish and Wildlife (Victoria) to Ottawa.
Existing Regulation & Justification Summary: *(may include biological comments)*

Existing regulations relating to Method, Gear and Bait which are intended to reduce injuries and death of recreationally-angled and released fish in Skeena region include:

- Single barbless hooks must be used in all streams of Skeena region, all year.
- Bait bans are in place on most summer-run steelhead rivers during the calendar period(s) when adult steelhead are present and fishing is allowed.

Management Considerations: *(summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)*

The present provincial policy of non-retention of wild steelhead derives from conservation and social objectives. Other things equal, improved survival of released catch benefits both objectives. The proposal also suggests impacts of spoons to bull trout, which for conservation objectives must be released at present in streams of Skeena Region. Reduction in injuries and death of released species such as bull trout would also benefit objectives served by the current regulations regimes for those species.

In most cases, non-tidal recreational fisheries for adult steelhead occur at times and places that other species of fish are also present and captured by angling. These other species may be

- targeted or bycatch,
- available for harvest, or mandatory non-retention, and
- under provincial angling management authority, or salmon species which are not.

Variation Orders related to Method, Gear and Bait which are enacted through the province’s delegated authority in non-tidal waters apply only to finfish other than salmon, and must be “mirrored” by a federal Variation Order to apply to salmon angling. Mirroring is almost always completed, because un-mirrored regulations are difficult to enforce and of reduced effectiveness, and the federal and provincial agencies seek to support the other’s objectives where possible. Any change to allowable methods for steelhead would, if mirrored, have significant potential impact on angling for other species such as coho in many places. The proponent alludes to this by stating that the requested change “may be problematic with a coho catch and retain season overlap.” Spoon fishing for coho is popular at the same times and many places summer steelhead fisheries occur.

At present, no North American jurisdiction appears to define spoons as a gear type or regulate the use of spoons specifically as an angling method.

A large number of studies have examined injury and survival of released fish following angling capture. Because there is great variability in recreational fisheries and the environments and ways in which they are conducted, it is difficult to isolate the effect of a single gear type and extend the result to a different species, size of fish, and angling environment. Many studies display greater injury and mortality with bait as a method, but there is no clear consensus that spoons create greater likelihood of injury/fatality than other non-fly gear types. A survey of the literature found no research which specifically
compared cast-and-retrieved spoons to other methods used in river fisheries for steelhead.

Although the focus of the proposal was spoons, the proposal also discussed the asserted elevated risk of injury and mortality from spoon angling in relation to the size of the hook and offered one option as the restriction of hook size on spoons (but not other gear types). The Method, Gear and Bait Restrictions section of the BC Sport Fishing Regulations provides one option for regulation of hook size in non-tidal angling: hooks may be limited to 15 mm or less from point to shank. This regulation could not be selectively applied to fishing with spoons, as an undefined gear type, but could be applied to all angling for finfish other than salmon in designated times and places. This hook size restriction was recently enacted for the period Oct 1 to Dec 31 for the Thompson River, for steelhead conservation concerns (R. Bison, Fish. Biol., Region 3).

Available Options: (where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)

Option 1. Reject the proposal and maintain the status quo of mitigating release injury and mortality through the number of hook points, the absence of a barb on hooks, and the proscription of bait.

Option 2. Pursue the ability to vary the use of spoons, by submitting a proposal to the Fish and Wildlife Manager (Victoria), which if approved would be submitted to DFO (Ottawa) for an Order in Council to amend the Method, Gear and Bait Restrictions section of the BC Sport Fishing Regulations to allow regulation of spoons as a Method. If approved in Ottawa, prepare a VO to regulate spoon fishing with normal consultation as in option 3.

Option 3. Direct Skeena fisheries staff to investigate the regulation of hook size as an approach to reducing injury and post-release mortality of provincially-managed species including steelhead, within the current Method, Gear and Bait Restriction variations offered in the BC Sport Fishing Regulations, and prepare a proposal for consideration by First Nations, DFO, Conservation Officer Service, SFAC and others. This approach would not address spoons specifically, and might require the hook size restriction to apply to all angling methods in the times and places where applied.

Summary of SFAC Issues and Concerns:

- some members agreed that larger hooks are general more injurious to fish
- the issue of inconsistent sizing of hooks by the manufactures was raised as a challenge to anglers knowing what size of hook would be allowable
- the view was expressed that trailing hooks were more problematic, although the definition of trailing was not completely clear
- the issue of whether a DFO mirror order would be obtained was identified as a concern
- one member expressed the view that immediate hook setting by the angler was most important and could be improved by education
- one member felt that anglers might leave fishing if they were forced to change hooks on their gear
The meeting minutes do not record whether a vote of support or disagreement by committee members was made for this proposal.

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<th>Regional Section Head Decision:</th>
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<tr>
<td>Option 3: Skeena Regional fisheries staff to investigate and report out for discussion prior to next regulation change cycle on feasibility of implementation of hook size regulation change associated with, but not limited to, mirror orders, timing, geography and consultation.</td>
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<tr>
<th>Troy Larden</th>
<th>Date:</th>
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<tr>
<td>Fish and Wildlife Section Head</td>
<td>2017-03-17</td>
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**Fish and Wildlife Section Head Decision: SFAC Regulation Proposal 2016-04**

**Proposal Title:** Bait ban Skeena River and tributaries

**Proponent:** BC Federation of Fly Fishers

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**Proposed Regulation Change:**

The proposal is to ban the use of all natural baits over the calendar year as a lure while angling for steelhead, all species of trout (rainbow and cutthroat) char (dolly varden, bull trout and lake char where they may drop down from a lake into the top pools of a river) and whitefish. Most of these species can be found somewhere in the Skeena River system during every month of the year. The proposed bait ban is for the total length of the Skeena River and all of its tributaries except those that have been designated in the existing regulations as streams where it has been deemed desirable to allow natural bait to be used for special fisheries for children or fish management reasons.

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**Summary of issue(s) proposal is to address:**

Bait bans have been implemented over time in river systems across British Columbia and within other jurisdictions and countries as a means to provide protection for juvenile salmonid species and or to reduce the hooking and capture of adult steelhead, trout, char and other species that are overwintering, are vulnerable from too many being caught and too protect small or endangered populations of all these species.

A variety of studies and a wide angler understanding and agreement over many years has conceded that both adult and juveniles will too often ingest bait, deep into the throat or gill, and when hooked the point of the bait hook can puncture critical arteries and cause the fish to bleed to death. Most of the studies have shown that there are more angler contacts with target species using bait compared to artificial lures and usually causes more bleeders compared to equal number of angler hookups using artificial lures. This undoubtedly would be the case where angling off of gravel bars using the so called still fishing technique with a baited hook or lure such as spin-n-glo that is in a stationary, weighted position where a fish can swim up to the bait and often ingest it and swim away and in a rush and hook itself. The angler has very little control over the hookup, particularly those anglers who are not very experienced and who do not understand and at times do not care about catch and release and the reasons for it as a fish management tool.

Hook size restrictions are critical for reducing bleeders whether using natural bait or an artificial lures. Large or oversize hooks even on an artificial lure will too often penetrate vulnerable arteries. It makes no sense to use natural bait in a catch and release fishery and flies in the face of the very principle which is to
reduce, and in fact minimize the number of fish hooked that result that can result in a sub-lethal or lethal outcome.

To use the argument that a bait ban regulation would negatively impact children and families who are just learning how to fish is unreasonable and not a fact. It is true that bait is more effective in hooking fish, which includes juvenile fish that are more aggressive than adult fish because they are constantly on the prowl for food which makes them more susceptible to the smell of bait and the soft texture, particularly of salmon eggs or roe and garden worms.

The goal is not to hook any juvenile fish regardless what lure one is using including flies. Most lures do hook juveniles, with artificial lures usually around the outside of the mouth allowing anglers to release them easier and quicker.

Children and all family members can learn how to use artificial lures such as spin-glow's dangling behind a boat or by casting and still fishing with bar rigs as they would with bait. It is in fact easier to fish with artificial lures because it is not necessary to attach and reattach a fresh piece of roe that is often eaten by juvenile trout, char, white fish and so on. And it will often break off by the current moving it back and forth or it will some time fly off the hook when casting.

It is a challenge and fun to find artificial lures that work, it is all part of angling and most children and families quickly learn from word of mouth or by experiment what works and what does not.

Most of all catch and release is intended to encourage anglers to catch less, rather than more, and reduce injury and mortality of the fish that are released.

The Skeena Watershed is not a very productive ecosystem compared to comparable size river systems in warmer regions of BC and south into the U.S. It is possible by angling to cause a substantive impact upon indigenous populations of trout and char if angling pressures become too great and concentrated.

There is little doubt that angler numbers have increased dramatically over the past decade and will continue to grow as the human population in the Skeena Watershed and Kitimat area increases as a result of extensive industrial growth. As well this growth will continue to intensify in the north, south and in eastern BC, the US, and from abroad as fisheries elsewhere decline or their quality deteriorates also from too many people and angling pressure and environmental issues.

Not to be ignored is the declining Canadian dollar, which is making Canada a tourist bargain. Many financial experts are saying the Canadian dollar will remain well below par for years to come. We must prepare for an increase of foreign anglers which is good and bad, who nevertheless have to be managed and controlled in order to protect our fish resources and the quality of our recreational
fisheries.

The SFAC committee should take a proactive, futuristic approach towards angling on the Skeena River and its tributaries. If the right things are done it is possible to preserve and even enhance the angling experience of this very special fishery. The goal should be to modify our desires and encourage others to do the same, catch less but enjoy the experience to the maximum. There will be much to offer and the demand will recognize what is available and be the first in line to participate in a Skeena angling experience. Destroy it or allow it to deteriorate will make no one happy, tourism will suffer and so will the experiences now enjoyed by resident anglers.

The now enshrined bait ban on the Thompson River took years to become reality, before it happened it divided and pitted anglers, conservationists, First Nations, fishery managers, tourism operators and ordinary people against each other. All concerned about that great river and its steelhead fishery should have focused on saving its steelhead (not the fishing) that are now only hanging on by a thread by managing water allocation, the commercial salmon fishery, habitat and the recreational fishery that have all contributed to the problematic future of these fish.

We must not go through that agony and despair that haunted those who have cared about Thompson River steelhead (and there are many) here in the Skeena Watershed as we together grapple over how to manage what is arguably the largest, wild, summer run steelhead fishery remaining in the world.

**Regulatory/ Policy Impediments: (list & provide details)**
The Skeena River is a migration corridor for many species including steelhead, chinook salmon, coho salmon, sockeye salmon as well as other species. The outcomes of a general prohibition against using bait, for the entire length of the Skeena River, while angling for non salmon species, are unclear. Salmon anglers using bait would continue to capture non salmon species incidentally, when both are present, the regulation would also be challenging to enforce.

**Existing Regulation & Justification Summary: (may include biological comments)**
Currently, steelhead related bait bans in the Skeena watershed are generally applicable to major steelhead spawning tributaries. They are also generally applied, during periods of time, when steelhead are present in large numbers relative to other species. To further protect overwintering and spawning summer run steelhead a large portion of the Skeena River, and its tributaries, are closed to all angling for several months annually.
Management Considerations: *(summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)*

Available Options: *(where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)*

Summary of SFAC Issues and Concerns:

The provincial SFAC Committee did not have any comprehensive discussion regarding this proposal.

The committee vote was two in favour, four against and two abstained.

Fish and Wildlife Section Head Decision:

Recommend not forwarding to F&W Director for approval

Signed by: [Signature]

Troy Larden  
Fish and Wildlife Section Head  
Date  
2017-02-15
### Proposed Regulation Change:
Close the river to all angling on (one month earlier than the existing regulation) December 1 to June 15 from the same location below the Zymoetz Canyon (lower/first canyon at 5 km. on the Copper River Forest Road).

### Summary of issue(s) proposal is to address:

This is a pause, to realize that the Zymoetz River summer steelhead are being subjected to increasingly more angling pressure which has and likely will result in a rise of sub-lethal and lethal impacts while these fish are in their overwintering/holding state. Only a few years ago this was not an issue but very quickly the situation has changed with more and more knowledgeable, very competent anglers, with float boats and more effective and varied tackle and communication networks that were not imaginable a decade ago providing them with the ability to catch increasing numbers of these vulnerable steelhead.

It is well known that holding steelhead are easy to catch by those who understand what is going on/are experienced anglers and who use the most effective tackle. It is not acceptable for any angler under these circumstances to be catching large numbers of steelhead while they are in their sanctuary period, almost a time of semi-hibernation, living for the most part off of their body fats and the odd tid bit of food that is available.

The question that needs to be asked: “When and at what time should anglers leave overwintering steelhead alone alone”?

### Regulatory/ Policy Impediments: *(list & provide details)*

### Existing Regulation & Justification Summary: *(may include biological comments)*

The Skeena River and its tributaries, upstream of Cedarvale are closed to all recreational angling from January 1 annually. The Nass River is also closed annually, on the same date, to recreational angling upstream of Kitsault River. The annual January 1 closure to angling on the Zymoetz River is consistent with the other angling closures indicated above in terms of timing and objectives. The
January 1 closure is thought to represent the general time period when water temperatures have declined to the threshold where the majority of summer-run steelhead will have entered overwintering habitats. It is unclear from this proposal if the writer believes that Zymoetz River steelhead are inhabiting their overwintering habitats earlier, or if January 1 has never been representative of the time period when the majority of Zymoetz River steelhead are in their overwintering habitats. The writer has also expressed concern that angler effort and angler efficiency has increased late into the season.

**Management Considerations:** *(summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)*

It is important to note that the majority of regional regulations, that are in temporal in nature, have some linkage to fish life history and angler behavior. Climate change has the potential to change both angler and fish behavior. Over time, temporal regulations should be reviewed, and if necessary altered, to ensure that the objectives of their implementation are still being met.

**Available Options:** *(where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)*

Recommend that the writer re submit this proposal next year and clarify what the concern is he is trying to address with this proposal. Do not recommend forwarding to Fish & Wildlife Director for approval at this time.

**Summary of SFAC Issues and Concerns:**

Vote: In favor 2, Against 5, Abstain 1

**Fish and Wildlife Section Head Decision:**

Do not recommend forwarding to Fish & Wildlife Director for approval at this time.

**Signed by:**

Troy Larden  
Fish and Wildlife Section Head  
Date 2017-02-15
**Fish and Wildlife Section Head Decision:** SFAC Regulation Proposal 2016-6

**Proposal Title:** Zymoetz River Catch and Release Quotas

**Proponent:** BC Federation of Fly Fishers (BCFFF)

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<tr>
<th>Proposed Regulation Change:</th>
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<tr>
<td>This stakeholders proposal has two parts:</td>
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<tr>
<td>(1) Prescribe a steelhead catch and release quota of 2/day on the Class 2,(B) Section of the Zymoetz River (including tributaries ), and</td>
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<tr>
<td>(2) Prescribe a steelhead catch and release quota 4/day in the Class 1 (A) Section of the Zymoetz River (including tributaries)</td>
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<tr>
<th>Summary of issue(s) proposal is to address:</th>
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<tr>
<td>• High vulnerability of steelhead to anglers throughout the mainstem Zymoetz River. This is particularly of concern in lowest reach of the river which is open to angling year round.</td>
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<td>• Rapid increase in angler effort fishing the Zymoetz River.</td>
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<td>• Reported increased total catch and a higher likelihood of increased total mortality.</td>
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<td>• Maintaining the quality on this world class fishery</td>
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<tr>
<td>• Disbursement of total catch to more anglers.</td>
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<th>Legislative / Regulatory Impediments:</th>
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<td>Prescribing a catch and release quota in British Columbia (BC) fresh water sport fisheries is currently not supported under the BC Sport Fishing Regulations, 1996 (section 56(1) <a href="http://laws-lois.justice.gc.ca/eng/regulations/SOR-96-137/page-4.html#h-29">http://laws-lois.justice.gc.ca/eng/regulations/SOR-96-137/page-4.html#h-29</a> The authority to modify freshwater sport fishery methods, closures and/or catch and retention quotas are currently the only regulation tools that the Canadian Federal Government has delegated to BC’s Director of Fish and Wildlife for use in developing sport fishery regulations. Changing language in the Fisheries Act - BC Sport Fishing Regulations requires approval via an Order In Council from federal authorities in Ottawa (S. MacIver, Sr. Regulation Policy Advisor, MoFLNRO). Submission of a proposal to change language in the Fisheries Act - BC Sport Fishing Regulations would be submitted from the Director of Fish and Wildlife. This said, there is precedence that catch and release language has, in recent years, been added to the Fishery Regulations for Newfoundland and Labrador, the three Atlantic maritime provinces (Nova Scotia, New Brunswick and PEI) and Quebec.</td>
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<th>Existing Regulation &amp; Justification Summary:</th>
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<td>The existing policy and regulation that is most pertinent to the stakeholder's proposal is the provincial wild steelhead non retention policy (described in the</td>
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Steelhead Classification Procedure 3-2-02.01) and the provincial steelhead managing regions zero/day retention quota regulation. The primary rationale for this policy and associated regulations is for both conservation and social objectives. Prescribing a catch and release can improve the returns in subsequent years and can accelerate a depressed populations recovery by several years. Catch and release regulations also improves the likelihood of encountering fish, and therefore increases the social and economic benefits both in the current season and in the season when the offspring of spawners return (Provincial Framework for Steelhead Management in British Columbia, 2016).

Management Considerations:

Creating language in Regulation to enable the prescription of a catch and release quota regulation is very relevant as it pertains to managing fish species and/or stocks in the many jurisdictions where catch and release is used as a management tool. In Canada managing fish stocks using catch and release regulations is a relatively new technique. In jurisdictions where pressure on a species and/or stock has increases, catch and release has been relied upon as a tool that in may maintain or improve stock status while still realizing some of the significant social benefits of maintaining a fishery. However, it is well recognized that catch and release fisheries are not impact free. In some cases a catch and release regulation may not be a precautionary enough management approach if catch and release associated mortality is higher than total mortality level that a population can sustain.

The status quo of unrestricted catch and release regulations (without a quota) may not be an effective stand-alone prescription if other fishery management objectives are not being met. Application of a catch and release quota may help distribute total catch over a wider number of anglers. This can occur if anglers who reach their quota are removed from the fishery for the day thus increasing more encounter opportunities for others. Some parallels of this management approach in BC can be observed in Hatchery Augmented steelhead streams where anglers are removed from that fishery once a harvest quota has been met.

It's worth noting that some anglers may be discouraged to participate in, or invest in accessing, fisheries with a catch and release quota that has set at too low a level. This said, in Canada half of the provinces that popular active Atlantic Salmon fisheries have catch and release quotas restrictions referred to in their respective Fisheries Act-Fishery Regulations and their Provincial Regulation Synopsis’s.

Available Options:
Option 1
Reject the proposal and maintain the status quo zero (catch and retain) quota for steelhead in the Zymoetz R.
Option 2
Consider prescribing a regional catch and release quota by following these general steps:

**Step 1** Submit a proposal to DFO Ottawa to update the *BC Sport Fishing Regulations* to include a section that allows the Province of BC (under its delegated authority) to regulate a catch and release quota.

**Step 2** Once the *BC Sport Fishing Regulations* has been modified and, where/if objectives are deemed to require a catch and release quota, propose the regulation change to the Skeena SFAC for advisory for input.

**Summary of SFAC Issues and Concerns:**
- There was some concern that the proposed regulation would discourage anglers in come to the region if they were required to stop angling if a catch and release quota was realized early in the angling day.
- It was recognized that this management tool was in place in other provinces in Canada.
- Some representatives recognized that a regulation of this nature would eventually catch on and would eventually become normalized.
- One representative inquired if the catch and release quota should apply to other species (i.e. trout and char).

The SFAC committee's voting response was as follows:
Support=2
Against=5
Abstain=1

**Regional Section Head Decision:**
Option 2: As a proactive opportunity in fisheries management, the proposal will be forwarded to Provincial Headquarters to pursue the necessary changes to the allow the establishment of catch and release quotas in the *BC Sport Fishing Regulations*.

Signed by: [Signature]

Troy Larden
Fish and Wildlife Section Head

Date: 2017-02-07
**Proposal Title:** Helicopter restrictions for Zymoetz River

**Proponent:** Jim Culp (BC Federation of Fly Fishers R6 representative)

**Proposed Regulation Change (from the proposal):**

"The BC FFF is proposing a restriction on the use of helicopters as a means to transport anglers from one fishing location to another fishing location on the Zymoetz River Class 1 Section or anywhere else within the Zymoetz River system.

Our proposal is that a helicopter should be limited to transporting and dropping off an angling party at the beginning of their trip and be picked up at the end of the day at a designated pickup location. The guided or unguided party would walk and fish, or walk and use a raft to ferry anglers across the river, or use a raft to float to the pickup location.

Unless the rules have changed for hunting, the transport of hunters by helicopter has been restricted for many years. Should the use of helicopters for angling be any different?"

**Summary of issue(s) proposal is to address:**

- Too many helicopters in Class 1 section creating safety situation (especially when pilots not communicating) and also degrading quality of experience for other anglers.
- Anglers being moved multiple times during the day, creating increased air traffic and noise and “scooping” anglers who hiked in to difficult to access locations.
- Helicopter use attributed to angling guides and individual anglers.
- Class 1 section is rare and very special angling experience. The proposal states "Helicopters buzzing up and down the valley are no more acceptable than logging which has not taken place during the prime time of September and October, which has a condition of the "LRMP Special Management Zone" along the river agreed to respect the quality of the angling experience for angling guides and their clients and unguided resident anglers during that time of year. While I was a member of the LRMP representing tourism during the process I was instrumental in being able to convince all of the LRMP members at the time to agree to the concession “Consider minimizing disturbance caused by resource development activities during the specified Class 1 angling season” through consensus. To date and since adoption of the LRMP plan in 2002 including the special provisions we are not aware of any logging having taken place during the Sept./Oct. time frame."

**Regulatory/ Policy Impediments: (list & provide details)**

As background from a wildlife management perspective, restrictions for hunting wildlife from an aircraft are enabled via S.27 (use of conveyance) of the Wildlife Act.
- S.27(2)(b) states “a person commits an offence if the person…uses a helicopter for the purposes of transporting hunters or game, or while on a hunting expedition.”
• S.27(4) states "a person who hunts game within 6 hours after being airborne in an aircraft, other than a regularly scheduled aircraft, commits an offence"
• These sections of the Wildlife Act support the principles of fair chase. As the proponent for this proposal identifies, this concept is not explicitly considered from a fisheries management perspective.

Regulations that may be applied regarding the restricted use of helicopters for angling are identified in S.108 of the Wildlife Act (Regulations by Lieutenant Governor in Council).
• S.108(3)(d) states “without limiting subsection (1), the Lieutenant Governor in Council may make regulations as follows...prescribing the conditions under which boats, aircraft, motor vehicles or snowmobiles may be used for the purpose of hunting, trapping, taking or viewing wildlife or for angling”
• S.108(4) states “the Lieutenant Governor in Council may delegate a power under subsection (2) and (3) to the minister”

According to policy analyst staff in Victoria, a regulation change as per S.108(3)(d) would occur via Ministerial Order. This is a similar to the Order in Council process.

**Existing Regulation & Justification Summary: (may include biological comments)**

There are no water specific restrictions regarding the use of helicopters on the Zymoetz River for angling. Further, there are no known restrictions regarding the use of helicopters for angling elsewhere in the province.

Provincial level restrictions exist pertaining to the transportation of anglers. As per S.3(2) of the Angling and Scientific Collection Regulation under the Wildlife Act, transportation of an “angler to 2 or more angling sites during a 24 hour period” is considered guiding for fish. Accordingly, unless an individual holds a valid freshwater angling guide licence, dropping off and picking up an angler within a 24 hour period is considered an offence if compensation or reward, received or promised is provided. As an exception, some helicopter pilots also hold an angling guide licence, allowing them to drop off and pick up anglers within the same day.

**Management Considerations: (summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)**

• The Angling Management Plan for the Zymoetz River Class 1 section identifies helicopter use as an unresolved issue. It states “the increased use of helicopters to access the upper Zymoetz River is contributing to crowding. When charters are not coordinated, helicopters may be operating in close proximity, degrading the high quality experience this remote section of river offers.”
• The use of helicopters by angling guides on the Zymoetz Class 1 section has been a historical practice, however, the manner in which conveyance has occurred is not well documented. It is known that angling guides will use helicopters to drop off and pick up anglers floating a section of river, while others will use these machines to move...
anglers multiple times/day to various fishing sites.

- The concerns outlined in this proposal relate to quality of experience issues (noise, disruption and “scooping” anglers who hike into remote locations) as opposed to biological conservation concerns. Many of these concerns broadly relate to mode of access and strong parallels exist regarding the use of jet boats for angling in some locations.
- S.108(3)(d) of the Wildlife Act enables the creation of regulations to manage aircraft for angling, however, such regulations do not currently exist and would require drafting and approval via Ministerial Order.
- The specifics of how helicopter use may be regulated on the Zymoetz River Class 1 section would require scoping to determine the nature and extent of the problem and consultation with angling guides.
- It is important to note that helicopter restrictions would apply to angling guides and individuals who own private machines, as dropping off and picking up anglers at more than two locations in a 24 hour period (i.e. by a helicopter pilot who is hired by non-guided anglers) is not generally permitted as per S.3(2) of the Angling and Scientific Collection Regulation.

**Available Options:** *(where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)*

- This proposal raises policy level questions regarding the use of helicopters for angling. Recommend forwarding to the Skeena Region Director of Resource Management and the Director of Fish and Wildlife for further discussion and consideration.

**Summary of SFAC Issues and Concerns:**

- One SFAC member did not believe the helicopter use situation to be as excessive as described in this proposal.
- It was noted that non-fishing related helicopters are working in the Zymoetz River watershed. Also, if pilots are not communicating, this is an aviation problem, not a fishing problem.
- Vote: In favor 2, against 5, abstain 1

**Regional Section Head Decision:**

Proposal to be forwarded to Regional Manager and Provincial Director of Fish and Wildlife for further discussion and consideration.

Signed by:

Troy Larden
Fish and Wildlife Section Head

Date: 2017-02-07
**Fish and Wildlife Section Head Decision:** SFAC Regulation Proposal 2016-10

**Proposal Title:** Power boat ban on the Zymoetz River.

**Proponent:** BC Federation of Fly Fishers (BCFFF)

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**Proposed Regulation Change:**
Ban the use of any power boats on the Zymoetz River Class 2, B Section or all of the Zymoetz watershed.

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**Summary of issue(s) proposal is to address:**
The stakeholder group identifies that jet boats are not needed to access to any fishing locations within the Class 2 Section of the Zymoetz River. If anglers started using jet boats in the Zymoetz the stakeholder group feels that they may cause “chaos and bad feelings” in the fishery. This in theory would impact the quality of the fishery in this highly valued Classified Water.

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**Regulatory/ Policy Impediments:**
Prohibiting power boats on any body of water in Canada is regulated under Transport Canada’s Canada Shipping Act, 2001- Vessel Operation Restriction Regulation (VORR). This regulation allows any level of government to ask the federal government (via application) to restrict power boat use on a water body after a proposal process (which includes the development, implementation and completion of a comprehensive consultation process) is completed.

The full terms of Transport Canada’s VORR application process can be found at: [http://www.tc.gc.ca/media/documents/marinesafety/LOCAL AUTHORITIES GUIDE - ENGLISH - ACCESSIBLE PDF.pdf](http://www.tc.gc.ca/media/documents/marinesafety/LOCAL AUTHORITIES GUIDE - ENGLISH - ACCESSIBLE PDF.pdf)

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**Existing Regulation & Justification Summary:**
There are no existing regulations that restrict power boat use in the Zymoetz watershed. The justification for not having powerboat restrictions on the Zymoetz River is likely due to the fact that few anglers have used powerboats on the river in the past and that the quality of the fishery has not been reported to have been disrupted by power boat use (see Management Considerations)

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**Management Considerations:**
The stakeholder’s proposal is meant to be proactive in its design to maintain the quality of the fishery and protect it from disruption that may occur if power boat use escalates in the watershed. Zymoetz River Guardian Program surveys in 1999, 2014 and 2015 identified that were no comments received by surveyed anglers that identified power boat use in the watershed was an issue for angling quality objectives. This said the stakeholder has identified that their proposal is proactive in nature and would likely help maintain angler satisfaction in the Zymoetz fisheries.
Available Options:

Option 1
Transport Canada identifies in their application package that the use of the VORR (power boat regulation change process) should be "the last resort for solving problems". The correspondence continues to council that "Involved stakeholders working together can often find more timely, effective and affordable solutions". If parties cannot agree on an alternate solution, the VORR can be an efficient way to resolve the conflict related to the use of the waterway.

Accordingly the MoFLNRO could work unilaterally or in collaboration with stakeholders to develop a non-regulatory approach to discourage the use of power boats in the Zymoetz. There is little information that would support that this approach would be successful in meeting the objectives of the proposal.

Option 2
Historical assessments have not identified any angling quality impacts associated to power boats on the Zymoetz. Accordingly, the MoFLNRO could continue to monitor the fishery to help inform if power boat management is needed to maintain angling quality on the Zymoetz. From there if power boat use escalates and the angling quality has been documented to be disrupted, then Option 3 could be considered. It is likely that if power boat use escalates then the consultative process described in Option 3 will be more difficult than if completed before power boat use becomes popular and positions become entrenched.

Option 3
The MoFLNRO could lead the process to complete a VORR to ban power boat use on the Zymoetz to proactively protect the status quo of that Classified Water's quality fishery.

Summary of SFAC Issues and Concerns:
The SFAC committee response to the proposal as submitted:
Support=5
Against=0
Abstain=3

Regional Section Head Decision:
Option 2, the use of power boats on the Zymoetz will be monitored through angler reports and submissions to the region. FLNRO will risk manage the likelihood of a more difficult consultative process if option 3 is initiated.

Signed by:

[Signature]

Troy Larden
Fish and Wildlife Section Head

Date: 2017-02-07
**Fish and Wildlife Section Head Decision:** SFAC Regulation Proposal 2016-11

**Proposal Title:** Power boat ban on the Kitumkalum River.

**Proponent:** BC Federation of Fly Fishers (BCFFF)

**Proposed Regulation Change:**
The stakeholder has submitted a proposal that could potentially require two regulation changes:

1. Explore the concept of a jet boat ban for the Kitumkalum (Kalum) River during the steelhead angling period from October 15 to May 1, and

2. Create a water-specific regulation that introduces a catch and release quota for steelhead in the Kalum River of two/day.

**Summary of issue(s) proposal is to address:**

**Regulation Proposal Part 1 - Jet Boat Ban**

The issues include:

- A need to reduce the boat traffic in the ‘Kalum by banning jet boats in the river below downstream of Kitumkalum Lake. Allowing only non-motorized boats in the ‘Kalum would restrict some portions of the river to only walk in anglers as pull out options for non-motorized (drift style) boats is quite limited (i.e. in the ‘Kalum upstream of the canyon). This proposed restriction would restrict angler movements in the watershed and may reduce their effectiveness and ultimately the total number of steelhead encounters (see part 2 of this proposal). The stakeholder identifies that this proposed quota will enhance the quality of the angling experience for all remaining non-power boat anglers on the river.

- The proposal also identifies a need to opening up the key drift boat take out upstream of Lean to Creek in the reach upstream of the canyon. This issue creating an additional pull out option in the upper river does not seem to be in harmony with the issue identified in the previous bullet.

**Regulation Proposal Part 2. - Catch and Release Quota**

- The issue presented in the stakeholder's proposal is that anglers catch and release steelhead in the ‘Kalum watershed almost year round. The fish that immigate to the ‘Kalum during the summer are potentially subjected to more encounters than winter and spring run fish and therefore may have a higher rate of mortality. The stakeholder group points out that they would like to also reduce the total number of steelhead encounters (referred to as “hook ups”) by prescribing a steelhead catch and release quota to 2/day.

**Regulatory/Policy Impediments:**
Regulation Proposal Part 1
Prohibiting power boats on any body of water in Canada is regulated under Transport Canada’s Canada Shipping Act, 2001- Vessel Operation Restriction Regulation (VORR). This regulation allows any level of government to ask the federal government (via application) to restrict power boat use on a water body after a proposal process (which includes the development, implementation and completion of a comprehensive consultation process) is completed.

The full terms of Transport Canada’s VORR application process can be found at: http://www.tc.gc.ca/media/documents/marinesafety/LOCAL_AUTHORITIES_Guide - ENGLISH - ACCESSIBLE_PDF.pdf

Regulation Proposal Part 2.
Prescribing a catch and release quota in British Columbia fresh waters is currently not supported under the BC Sport Fishing Regulations, 1996 (section 56(1) http://laws-lois.justice.gc.ca/eng/regulations/SOR-96-137/page-4.html#h-29 The authority to modify method, closure or catch and retain quotas is delegated by the Federal Fisheries Minister to the BC Director of Fish and Wildlife under the Fisheries Act. However there is currently no section in the BC Sport Fishing Regulations that speaks to catch and release quota. Changing language in the Fisheries Act - BC Sport Fishing Regulations requires approval via an Order In Council from federal authorities in Ottawa (S. Maclver, Sr. Regulation Policy Advisor, MoFLNRO).

Existing Regulation & Justification Summary:

Regulation Proposal Part 1

There are no existing regulations that restrict power boat use in the Kalum watershed. The justification for not having powerboat restrictions on the Kalum watershed is likely due to the rationale that historical jet boat use in the watershed has been authorized for many years. Early power boat in the Kalum was used primarily for salmon fisheries. However power boat use in the Kalum is currently employed in both the salmon and the steelhead fisheries.

Regulation Proposal Part 2.

There is currently no restriction for sport fish catch and release limits in any jurisdiction of British Columbia. The justification for this is likely that the now common fishery management tool of “catch and release” is relatively new in BC. As concerns for fish species and/or populations have increased around the province (and in western North America), stakeholders, First Nations and fishery managers are having to be more concerned about the total mortality associated to catch and release practices for both conservation and social objectives.

Management Considerations:

Regulation Proposal Part 1
The jet boat/power boat ban proposal has been submitted primarily for fishery quality objectives. There have been no “River Guardian” style angler surveys on the Kalum R. that assess angler opinions about jet boat use (amongst other fishery use attributes). However jet boat use concerns have been documented in other Classified Water systems (e.g. Bulkley and Zymoetz rivers) albeit jet boat use was reported to be less concern than most other factors (i.e. <5% reported jet boat impacted fishery quality for the Bulkley and Zymoetz surveys).

Environmental factors associated to impacts from jet boats have long been reported to the Fish and Wildlife Branch and have been studied by other agencies and academia. Proven impacts range from hydraulic habitat impacts to juvenile dry stranding and incubating egg mortalities.

**Regulation Proposal Part 2.**
Creating a catch and release quota is very relevant as it pertains to managing fish species and/or stocks in many jurisdictions where catch and release is used as a management tool. In Canada managing fish stocks using catch and release regulations is a relatively new concept. In jurisdictions where pressures on fish species and/or stocks has increased, catch and release has often been used as a tool that in may enable sustainable use while still realizing some of the significant social benefits of maintaining a fishery. However, it is well recognized that catch and release fisheries are not impact free and in some applications may not be a precautionary enough approach to management if catch and release mortality increases beyond a total mortality level that a population can sustain.

In some cases the status quo unrestricted catch and release regulation may not be an effective stand-alone prescription if other management objectives are not being met, such as distributing total catch over a wider number of anglers. Managers should consider that a catch and release quota may help allocate additional encounter opportunities to others. This may occur if anglers who reach their catch and release quota are removed from the fishery for the day thus increasing more encounter opportunities for others. However, depending on how a conceptual catch and release regulation is crafted, some anglers may choose to continue to angle for non-steelhead species (e.g. salmon) once they have reached their catch and release quota.

Some anglers may be discouraged to participate or invest in accessing fisheries with a catch and release quota that is set at unrationlized levels. This said, in Canada half of the provinces have catch and release quotas restrictions referred to in their respective Fisheries Act-Fishery Regulations. In all instances these regulations are being applied to Atlantic Salmon fisheries.

**Available Options: (where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)**

**Regulation Proposal Part 1**
Option 1
Transport Canada identifies in their application package that the use of the VORR (power boat regulation change process) should be "the last resort for solving problems". The correspondence continues to council that "Involved stakeholders working together can often find more timely, effective and affordable solutions". If parties cannot agree on an alternate solution, the VORR can be an efficient way to resolve the conflict related to the use of the waterway." Accordingly the MoFLNRO could work unilaterally or in collaboration with stakeholders to come to a non-regulatory approach to discourage the use of power boats in the Kalum. There is little information that would support that this approach would be successful in meeting the objectives of the proposal.

Option 2
The MoFLNRO could lead the VORR process to complete a VORR to ban power boat use on the Kalum to help improve and sustain that Classified Water’s quality fishery.

Option 3
(i) Defer the regulation change proposal and associated federal consultative process until fishery assessments have been completed on the ‘Kalum to evaluate the effects of jet boat use on angling quality; (ii) Compile information that formally identifies the effects of jet boat use on fish and fish habitat; (iii) Inform regulation recommendations and management approaches based on data collected from the current fisheries.

Option 4
Do not assess the fishery quality and consider prescribing other regulatory approaches to reduce encounters with ‘Kalum River steelhead (e.g. method quotas and/or closures).

Regulation Proposal Part 2.

Option 1
Develop a proposal to federal regulators in Ottawa to have catch and release language added to the BC Sport Fishing Regulations. Develop a catch and release quota (water-specific, regional and/or provincial) proposal for submission to the SFAC and/or PAAT.

Option 2
(i) Develop a proposal to federal regulators in Ottawa to have catch and release language added to the BC Sport Fishing Regulations. (ii) Gather stock and fishery information on the Kalum (and/or region) to further inform if a catch and release quota will achieve defined objectives.

Option 3
Consider prescribing other regulatory approaches to reduce encounters with
Kalum River steelhead (e.g. method, quotas and/or closures).

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<tr>
<th>Summary of SFAC Issues and Concerns:</th>
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<tbody>
<tr>
<td>The responses from stakeholders at the SFAC were diverse and in some cases strayed from the two main proposal objectives. However additional concerns were raised regarding the environmental impact from jet boats use in streams (fish habitat, incubating eggs, juvenile fish and stream morphology) and/or the esthetic impacts of jet boat use and angling quality. Generally participants agreed to restricting jet boats in the “upper” Kalum and survey anglers to see if the prescribed restriction is achieving the proposed objective. One representative felt that no additional conservation based restrictions were required on the ‘Kalum as fish stocks have recovered from the past impacts caused by historical forest development activities. This position was not universally accepted by the other SFAC representatives.</td>
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<tr>
<th>The SFAC committee’s declaration response to the two part combined proposal was as follows:</th>
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<tbody>
<tr>
<td>Support=2</td>
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<td>Against=5</td>
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<td>Abstain=1</td>
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<th>Regional Section Head Decision:</th>
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<tr>
<td>Regulation Proposal Part 1: Option 3 – The use of power boats on the Kalum River will be monitored through angler reports and submissions to the region.</td>
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| Regulation Proposal Part 2: Option 2 – Forward the proposal to Provincial Headquarters to pursue the necessary changes to allow the establishment of catch and release quotas in the BC Sport Fishing Regulations. Continue to collect stock and fishery information to inform the potential for implementation of a Catch and Release quota regulation to be implemented at a later date. |

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Troy Larden  
Fish and Wildlife Section Head  
Date: 2017-02-07
Fish and Wildlife Section Head Decision: SFAC Regulation Proposal 2016-13

Proposal Title: Zymoetz River Fly Fishing only October 1 – December 31

Proponent: Jim Culp – BC Federation of Fly Fishers

Proposed Regulation Change:

This proposal is for the Zymoetz River in the Class 2, B Section above the First Canyon at 5 km on the Copper River Forest Road, from October 1 to the angling closure (Jan.1 or Dec.1). Anglers to be restricted to fly fishing only, floating line, single fly hook (no internal or external weight) and # 4 fly/hook size.

Summary of issue(s) proposal is to address:

Too many steelhead caught and released with an associated mortality. The proponent wishes to instill the quality experience approach amongst anglers rather than angling being a competition with quantity of steelhead caught being the most important goal.

Regulatory/ Policy Impediments: (list & provide details)

None.

Existing Regulation & Justification Summary: (may include biological comments)

Zymoetz Class 2, B Section - bait ban, Canadian Residents only on Fridays, Saturdays and Sundays July 24 to December 31. There are also some specific regulations for guiding that allows non-resident anglers to be guided on Friday and Saturday that can be found on the Government website.

Management Considerations: (summarize relevant: stock status, life history information, exploitation levels/limits, information or observations from other geographic locations or jurisdictions & relevant examples / references from the literature, social issues)

Bait is currently defined in the Freshwater Fishing Regulations Synopsis: “Bait’ is any foodstuff or natural substance used to attract fish, other than wood, cotton, wool, hair, fur or feathers. It does not include fin fish, other than roe. It includes roe, worms and other edible substances, as well as scents and flavourings containing natural substances and nutrients.” (From page 9 of the Freshwater Fishing Regulations Synopsis). By this definition, scented rubber worms are currently not a legal terminal tackle.

BC fisheries managers promote a diverse array of allowable angling methods to
encourage participation.

Available Options: *(where appropriate, incorporate biological information above that supports an alternative approach to achieve the same outcome more effectively)*

N/A

Summary of SFAC Issues and Concerns:

There were 2 in favour and 5 opposed with one abstaining from the Skeena Fish Advisory Committee. Comments from those in favour included citing concern for stressing fish and their need for sanctuary areas and the desire to reduce the efficiency of anglers – to provide good opportunities for many rather than exceptional opportunities for a few. Comments from those opposed include not favouring terminal tackle changes if a conservation concern could not be proven and that education and hook size were key issues in addition to the illegality of scented artificial lures.

During discussions pertaining to previous, related proposals, most agreed that fly-fishing has evolved to be considerably more effective and that regulations would not be the solution to reducing encounter rates. The current proposal likely evolved from that discussion, however, as noted above, BC fisheries managers promote a diverse array of allowable angling methods to encourage participation.

The committee recommended that the proposal not be forwarded to the Regional Manager for approval.

Fish and Wildlife Section Head Decision:

Not recommended to forward to the Director of Fish and Wildlife for implementation.

Signed by: [Signature]

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<th>Troy Larden</th>
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<tbody>
<tr>
<td>Fish and Wildlife Section Head</td>
<td>2017-02-08</td>
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