Joe Saysell

Friends of the Cowichan

Box 169

Lake Cowichan, B.C. V0R 2G0

May 8, 2021

Hon. Katrine Conroy

Minister of Forests, Lands, Natural Resource Operations and Rural Development

Room 248, Parliament Buildings

Victoria, B.C. V8V I4X

Dear Minister:

Another year has come and gone since I last wrote to the ministry on the subject of the Cowichan River’s fish stocks and the issue of the upper Cowichan River being open for angling during spawning time --- December, January, February and March. The amount of pressure, especially from guiding on the section of the river from Greendale trestle downstream to the 70.2-mile trestle during December, January, February and March is greater than I have ever seen in all the 72 years that I have lived on the upper river.

We all know that the upper river from the 70.2-mile trestle upstream to the weir is where the vast majority of the chinooks spawn. It is also where a large percent of the coho and steelhead spawn. And we also know that this area is where 95 percent of the rainbow trout spawn. This area is one continual spawning redd at this particular time, mainly because of the stability of the upper river and also because of the particular gravel sizes. In other words, it is ideal spawning habitat and is considered by many to be the “delivery room” and “nursery room” of the Cowichan River. Yet it is open for angling during the fall, winter and early spring, when fish are very vulnerable during spawning.

One has to ask: just how much damage to the redds are all the anglers doing by wading or anchoring on this fragile area, or how much harm is being done to fish that are in spawning mode (dark and laden with eggs)? We cannot say, because there have not been any studies done on this subject. They are physically impossible to do because of the higher winter flows. Plus, most of the rainbow trout migrate back to the lake in spring, when the water drops, thus making accurate counts impossible.

In the past, anglers were considered conservationists as they did everything possible to protect fish, especially spawners. But today, that term does not describe the anglers who are fishing this area during December, January, February and March, because real conservationists do not fish in spawning areas or over dark spawning fish. It is unethical to do so, yet this is exactly what is happening today in this section during those months.

One also has to question what fly fishing actually is, since they are using extremely heavy lines, sinking leaders and extremely heavily weighted flies, which actually makes this angling bottom bouncing. The regulation of fly fishing was actually first brought in, in 1975 to stop bottom bouncing of gear fishing to protect fish populations, as the stocks had basically collapsed. Please remember that it is the weight that is getting the line (fly) down to where the fish are, and this is causing the damage.

Technology has come so far today, with the new weighted lines and new weights for flies, that the method of fishing in the fall and winter in this area can no longer be described as fly fishing. The regulations and ministry are way behind the times and need to catch up.

The only way to justify having this area open is to have this critical spawning section under a floating-line, no-weighted-fly regulation, plus a daily catch-and-release quota of one steelhead and four trout for the time from December through March. This would cause an enforcement problem as we do not ever have enough conservation officer presence now.

Also, while this regulation might prevent damage to spawning fish being hooked during this vulnerable time of their lives, this will still not address the damage caused to eggs in the gravel by wading and anchoring. These eggs of salmon, steelhead and trout are our future generations of fish, so we must protect them to the fullest. Thus, the only solution is to close this section for the vulnerable months of December, January, February and March from the 70.2-mile trestle to the weir, as it was pre-1988. If the regulation protected fish pre-1988, it will protect fish now.

Especially since we do not have the science to justify keeping this area open during these four critical months, we believe that the ministry should close it till it is scientifically proven that no harm is being done to the fish and redds during this time frame. In other words, err on the side of caution and conservation rather than angler opportunity.

Please remember that all rivers need a sanctuary section for spawning and an undisturbed area for incubation of eggs and alevins. After all, when one looks at the fishing regulations synopsis, most rivers in other regions of the province are closed after a certain date or have spawning areas closed to protect spawning fish. Why not the Cowichan? Is closing four out of 32 miles, leaving 88 percent of the river open for angling during the winter time, that much of an imposition on anglers? We do not think so and believe that most anglers and conservationists would agree with us.

We urge you to enact the right ethical and biological regulations which will protect our fish for future generations.

Yours sincerely,

Joe Saysell

cc. Sonia Furstenau, MLA

Alistair MacGregor, MP.

Cowichan Watershed Board

Cowichan Stewardship Roundtable

B.C. Federation of Fly Fishers