

October 18<sup>th</sup>, 2021

David Muter  
Assistant Deputy Minister,  
Ministry of Forests, Lands, Natural Resource Operations & Rural Development  
Victoria, BC

Dear Mr. Muter,

On behalf of the Wild Sheep Society of BC, we are writing to you to express our concern about proposals in Provincial Management Unit Region Four; specifically, the Kootenay Region Bighorn Sheep Harvest Management Analysis dated September 2021.

While we share concerns around the diminishing wild sheep populations in the Kootenays, we are troubled with the proposed approach to managing this challenge. Without question, if wild sheep populations have reached a scientifically backed conservation concern, we would support every reasonable measure to protect the species. However, while hunter harvest may be a factor in Kootenay wild sheep populations, we do feel other factors largely contribute to diminished herds. Examples include habitat fragmentation and loss (often to industry), increased pressure from non-consumptive users, predation and disease. Unfortunately, the Ministry document does not address or provide any meaningful solutions to any of these issues, except to restrict hunter harvest.

The Wild Sheep Society of BC notes the example of Limited Entry Hunt (LEH) implementation to protect dwindling Assiniboine Bighorn Sheep. This is one example of how implementing LEH is not always the best solution- at least certainly not in isolation. There are many management strategies that should be undertaken first relating to the issues stated above. Additionally, we feel that several alternate strategies pertaining to hunter harvest could be entertained that would preclude a need for LEH restrictions.

We have engaged our membership on this issue, and we feel that numerous alternatives to full implementation of Limited Entry Hunting need to be explored. We kindly request that decisions on the implementation of LEH be withheld until further engagement with stake and titleholders. It is clear to the Wild Sheep Society of BC that the bulk of issues relating to dwindling Bighorn populations in Region Four are not caused by hunters and these must form part of the solution as we move forward.

The Wild Sheep Society of BC is eager to work with the Ministry of FLNRORD regarding this issue and to explore solutions that will benefit wild sheep and other species. We do acknowledge that as consumptive users, harvest must be managed when there is a problem.

We look forward to hearing from you as we work together towards meaningful solutions.

Yours in Conservation,



**Kyle Stelter**  
Chief Executive Officer - Wild Sheep Society of BC