



Reference: 267836

November 30, 2021

VIA EMAIL: kstelter@wildsheepsociety.com

Kyle Stelter, Chief Executive Officer
Wild Sheep Society of BC

Dear Kyle Stelter:

Thank you for your letter of October 18, 2021, regarding bighorn sheep populations and engagement on options for harvest management in the Kootenay Region to David Muter. I have been asked to respond.

The Kootenay Region Bighorn Sheep Management Plan (the Plan) was recently completed and includes an overview of best available information on status, trends, and threats; establishes several population and habitat objectives; and, provides specific recommended management actions. I understand that your organization is actively partnering on several projects to implement the Plan; thank you for your support and leadership.

Specific to harvest regulations, changes may be driven for a variety of reasons with the intent to manage harvest pressure and hunter experience in a manner consistent with the management objectives identified for the species and / or population management unit. During engagement on the draft Plan, several harvest management strategies were discussed and that feedback help inform the current Limited Entry Hunt proposal. Additional options were considered by regional and provincial staff during the development of the proposed harvest regulation (Appendix 1).

Since receiving your letter, I understand that additional discussion occurred at the Provincial Hunting and Trapping Advisory Team meeting. A public engagement is scheduled in the coming weeks prior to taking regulation proposals to the Minister for decision. You are welcomed to continue your conversation with staff during this period. All input received is summarized and provided to the Minister to support the decision.

To help inform further engagement on this proposal, the Provincial Sheep and Goat Specialist and regional staff have provided additional information also appended to this letter (Appendix 2). I am hopeful that this information helps to inform where there may be ways to improve the knowledge about these sheep herds and their management, as well as bring clarity where there may be divergence in agreement on approach that will lead to meaningful engagement and a transparent decision that has the highest probability of improving outcomes to sheep. We appreciate your input as we look at management approaches that minimize the potential of

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cumulative effects and the implementation of other management actions that will contribute to a healthy sheep population in the Kootenay Boundary Region.

I invite you to further discuss this information with Bill Jex (Bill.Jex@gov.bc.ca) during this period.

Again, thank you for writing and sharing your concerns.

Sincerely,



Jennifer Psyllakis
Director

Attachments: Addendum

pc: David Muter, Assistant Deputy Minister, Resource Stewardship
Michael Burwash, Associate Director of Wildlife
Bill Jex, Provincial Sheep and Goat Specialist
John Krebs, Director of Resource Management, Kootenay Boundary Region

Appendix 1

Summary of options considered during engagement or by region and branch staff:

1) Shortened GOS season (Sept 10 – Oct 15):

Benefits: May protect some rams from harvest during the fall migration period.

Challenges: Condenses hunting pressure into shorter season. Assuming some shift of kills to earlier in the season, the overall harvest may decrease by only about 5% or 8% for a 5- or 10-day shorter season, respectively.

This option would very likely inject a higher density of hunters into the landscape and across a broader area, albeit for a shorter period than current regulations, and this is likely to also then create added disturbance and potentially manifest into effects on fitness in non-target sheep such as ewe-lamb groups who would be displaced from preferred habitats to avoid hunters on the landscape.

2) Maintain GOS in Elk Valley where rams are protected by no shooting areas:

Benefits: Hunting opportunity would be maintained in the area that has highest escapement of mature rams and protection from harvest.

Challenges: Hunting pressure within the Elk Valley will likely increase substantially if hunting opportunity in other areas of the region are restricted by LEH regulation and thus create a disproportionate impact on these herds.

It may be that implementation of the regional LEH creates a similar displacement effect on sheep populations in other regions, however the most adjacent areas are also proposing, or have already implemented, LEH for sheep so the net effect may not be as significant as initially speculated; this aspect of post-regulation change will need to be monitored to develop a better understanding of the magnitude of effect.

3) Institute “wait out periods” where a hunter cannot purchase a sheep tag for 3 or 5 years after harvesting a ram:

Benefits: Would likely allow greater hunter participation than an LEH season and limit hunters from harvesting multiple rams in consecutive years or for up to 5 years.

Challenges: This would not likely reduce harvest significantly as very few hunters harvest more than 1 ram over 5 years. Analysis shows only 6% of hunters harvest more than 1 ram over 5 years and 2% harvest more than 1 ram over 3 years. Overall, 11% of hunters have harvested 2 rams in their lifetime and 2.5% have harvested 3 rams.

The provincial licensing system does not currently allow for wait-out periods, so this would require a separate procedural and regulatory suite of changes to be developed over the next 1-2 years for establishment in the next regulation cycle. If this was part of an endorsed strategy, some decision about how to manage harvest pressure on the regional bighorn populations in the interim would have to occur immediately.

4) Create separate thornhorn and bighorn tag and restrict hunters from purchasing a thornhorn and bighorn tag the same year:

Benefits: Potential for slight reduction in harvest pressure and hunter activity related to thinhorn and bighorn sheep.

This would improve the Province's ability to better understand hunter demand, participation and activity as it relates to each species of wild sheep and ultimately would support more informed management of this resource and hunter interests and activities.

This could potentially result in a slight financial gain through licence sales.

Challenges: The combined provincial bag limit for wild sheep is 1 sheep. Currently hunters cannot harvest both species in one year; analysis shows that only 6-7% of sheep hunters in Region 4 (20-25 hunters) pursue bighorn and thinhorn sheep in one license year.

This would reduce a hunter's flexibility to hunt both species of wild sheep in a single hunt year, even though it may not change the gross harvest number of sheep because the provincial bag limit would remain at 1 sheep.

5) Implement priority draw system similar to Alberta:

Benefits: Provides some measure of certainty and consistency for hunters to plan when they may draw a sheep LEH tag.

Challenges: Will almost certainly lead to significant and sustained "point creep" where the required point level increases every year. This effectively removes opportunity for hunters to draw a tag within a reasonable timeframe if they don't apply to the draw in the first year and every subsequent year thereafter. General feedback from hunters does not appear to favour this approach over our current LEH random draw structure.

6) Implement a Licensed Hunter Harvest Limit and 24-hour Notification of Immediate Hunt Closure similar to what is used in some U.S. states:

Benefits: The Ministry could have improved control and better manage the total number of rams harvested in a given year as opposed to trying to manage an unknown level of harvest that can result from calculations that are part of the current LEH authorization setting process.

Challenges: If hunt zones and geography are not included in this delivery approach the outcome may be less effective at distributing the harvest pressure across a population management unit than the current LEH structure and could then lead to increase localized impacts to herd demographics and compositions.

This would require developing different harvest opportunity approaches for resident and non-resident, as guide outfitters are currently issued annual quota with a 5-year planning horizon which helps inform the resident and non-resident allocation split. Also, a rapid closure would have implications to planned hunts resulting in business implications to guides and plans of resident hunters. The approach could also increase competition and hunt planning with risks increasing of harvest of non-compliant and younger rams.

Where this harvest management approach is used there are companion procedures that are also in place to support it. This licencing, season and harvest approach does not currently

exist in B.C. Policy and procedural changes and several new regulatory ones would be required in support of this design. Part of that redesign would require developing a defensible notification system so that hunters in the field can be reliably informed when the last available ram has been harvested.

Decisions on delivery of this type of harvest management structure would need to consider adjacent regions in a similar way as implementing an LEH structure, to ensure that hunter attraction or displacement effects occur in a predictable and manageable way.

Detailed Appendix 2

Sheep population management and recovery require a multi-faceted approach that includes various aspects related to habitat. Any changes to the regional harvest management structure will not take away from the numerous on-the-ground, sheep-focused projects that are currently being delivered. It is important to ensure that additional actions occur in support of the recommendations offered in the regional management plan and that our combined management actions contribute to ensuring healthy and sustainable bighorn sheep populations.

Harvest management is a controversial but necessary component of sheep management, especially in times of increasing hunter interest. The main concern with the current General Open Season regulatory structure is the lack of ability to manage for a more consistent and sustainable harvest rate and ram recruitment. The current low to near nil annual escapement of mature rams and increasing trends in illegal kills in some of the subpopulations are of significant concern. In addition, changes in ram horn growth appear to be occurring, not dissimilar to those patterns of change reported in Alberta, in the Ram Mountain study area. Over the past 2 decades there has been an overall increase in the proportion of 8+ year old rams in the harvest. High harvest rates on recruiting, young rams with fast growing horns can lead to an eventual decline in horn size and rams generally reaching full curl at an older age. This observed trend is occurring alongside a declining trend of 7-year-old rams in the harvest, suggesting that the current level of harvest pressure could be contributing to slower horn growth, and rams reaching full curl status at a later age.

While we recognize the drawbacks of Limited Entry Hunting (LEH) when it comes to hunter opportunity and participation, it remains the most responsive tool we have in B.C. to manage harvest pressure on a species that is in such high demand, with limited abundance and distribution, and with subpopulations so near the policy and biological thresholds for conservation and restricting harvest opportunity.

In the Kootenay Region, many of the low elevation and two high elevation wintering bighorn sheep herds have declined, with many bordering on non-viable status. Of the 12 PMUs identified in the Kootenay Region Bighorn Sheep Management Plan, 9 PMUs contain subpopulations that are fewer than 75 bighorn sheep. The Province's Bighorn Sheep Harvest Management Procedure directs closing harvest seasons if there are less than 75 bighorn sheep observed. While the regional management plan evaluated a number of harvest management alternatives, it did not prescribe future season structures or identify a sound alternative to implementing the Harvest Management Procedure rules. With the current level of interest, hunter participation and harvest, greater regulation over hunting pressure and harvest in herds bordering on non-viable status is warranted to support conservation of these subpopulations. Where recovery actions for habitat, population and harvest management are not implemented, then complete closure of these units will be the likely outcome; the current regulatory change proposal to implement an LEH type structure is an attempt to continue to maintain some opportunity for consumptive users.

Regional wildlife staff have had further discussion on harvest management alternatives and assessed which alternatives were most likely to meet harvest management objectives (see appendix above). In addition to the description of various options considered, the LEH

rationale document that was prepared to evaluate the region-wide LEH season also included comparison to other alternatives and was presented through stakeholder engagement. The proposed options is believed to be most likely to meet sheep population and harvest management objectives identified in the regional management plan.

We agree that populations will fluctuate due to other influences and not just as a result of the harvest management approach, and see Mount Assiniboine as an example of this. Please note that this LEH was implemented in 1982 to manage hunting pressure on a small, isolated population of sheep and limit impacts from backcountry users within the provincial park. Although LEH is unlikely to increase population growth rates on its own, it can be a valuable tool to manage and restore herd demographics and age structures in the ram cohort and on some scales reduce human-caused habitat avoidance/disturbances. Generally, when regional staff develop a regulation proposal their broader strategy for better managing that herd or population includes partnered activities such as access restrictions or habitat protection/enhancement, to address the non-hunting human impacts that population may be experiencing. Not knowing the complete details for these other activities that would have been associated with the 1982 change process, it is difficult to know if the issues you are concerned with were part of those other measures that were not completed, or if they were undertaken but perhaps were less effective than anticipated. Another consideration is that despite a point in time action or regulation proposal, the world continues to change, and it may also be that other unforeseen circumstances arose that diminished the effectiveness of the LEH's implementation.

The recently completed Kootenay Region Bighorn Sheep Management Plan offers some details related to current status and challenges for this population and offers some recommendations for its future management. Contributing to the conversation with regional staff about how to action some of those recommendations may support changes in the way that harvest in the population is currently managed and address some of the Wild Sheep Society's concerns.

In summary, we would like to emphasize that the Kootenay Region Bighorn Sheep Management Plan provides the overarching guidance for recovery of declining sheep populations, while the LEH document provides more specific analysis of the proposed LEH and other options. LEH is not to be viewed as the single solution to the numerous challenges facing bighorn sheep populations in the Kootenay Region. Managing known negative impacts from resource extraction activities, landscape and environmental change and non-hunting related human activities (e.g., motorized access & recreation) will be key components to rebuilding herd viability that could support future regulation changes to provide increased opportunity for hunters. We are pleased to continue to support the Wild Sheep Society's conservation agenda and work in collaboration with your group to further bighorn sheep conservation considerations in other decision-making processes, including habitat integrity, function, connectivity and health management actions.