

Wild Sheep Society of British Columbia
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Subject: Proposed changes to 2024-2026 Hunting and Trapping Regulations

Recently the Province of British Columbia released their proposed 2024-2026 Hunting and Trapping Regulations on the Angling, Hunting and Trapping Engagement (AHTE) website. This is an opportunity for you to comment on the proposed changes and we encourage you to do so.

The Society has reviewed these changes and has concerns around several of the proposals. Overall, there are several recommendations that are intended to reduce hunter density on the landscape with no evidence it will benefit wildlife. This was noted and referenced on several proposals, and it lacks the scientific data to support this. In fact, in some of the rationale the government states that they lack adequate data and are moving to a Limited Entry Hunt as a management strategy. The Society feels that there is too little rationale for many of these decisions and a lack of ingenuity to find solutions that may preclude Limited Entry Hunting and have greater benefit for the issues identified.

We encourage you to review the multitude of proposals and complete the engagement on the following site: <https://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/ahte/hunting-trapping>. Your feedback will be a factor in the decision-making process on the outcome of these proposals. The deadline for comment is March 22, 2024, so be sure to comment in a timely manner. We cannot emphasize enough the importance of submitting your comments.

We have provided some supporting comments on a few of the proposed regulation changes that may be helpful for you in completing your comments.

Proposed Regulation Change: Region 6/6A: Caribou LEH

<https://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/ahte/hunting-trapping/caribou-leh>

We support the Together for Wildlife strategy, reconciliation, and the development of co-management for wildlife. Unfortunately, the rationale for converting open seasons for caribou in Skeena and Omineca to Limited Entry Hunting (LEH) lacks data to support the change with no clear benefit for wildlife. The most compelling statistic that is cited for implementation of LEH is that additional days in the field are required to successfully harvest an animal. In the rationale, the government even cites “suspected” population decline which clearly signifies that there is no scientific data supporting their supposition.

The 5 point or greater requirement in most regions protects the species and LEH is simply designed to reduce the number of hunters on the landscape. This regulation proposal while it appears intended to address First Nations concerns complicates the narrative by also applying a rationale of science-based decision making however lacks the data to support it.

We recognize that First Nations needs are a primary consideration in this proposal and should be clearly stated as such. Managers quickly revert to the Limited Entry Hunting management tool when other options could satisfy First Nations concerns. A few examples that could be considered may include reducing non-Indigenous harvest in areas in close proximity to Indigenous communities, access management strategies or shortening hunting seasons. We do not support this regulation change as presented.

Proposed Regulation Change: Replace bighorn mountain sheep GOS with LEH

<https://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/ahte/hunting-trapping/replace-bighorn-mountain-sheep-gos-with-leh>

Data and science-based evidence is woefully inadequate from this decision. While harvest data is earmarked as a maximum of five rams annually, there is no data provided outlining the historical harvest numbers. Very limited inventory work (winter 2022) has been completed on these herds when there is an acknowledgment that collectively there were at least 129 Bighorns between MU-449 and MU7-19. It is recognized that these sheep are transborder and frequently migrate between the two provinces. Furthermore, Alberta has a more liberal harvest criteria with a General Open Season on $\frac{3}{4}$ curl rams. Lastly, there is a reference to lamb recruitment which would suggest a possible rationale for decreasing numbers. This points to a lamb recruitment issue not a harvest issue.

In closing, based on the governments rationale there is a lack of data supporting a change to a Limited Entry Hunt. Resources would be better focused on addressing alignment with hunting regulations with Alberta, addressing lamb recruitment concerns and ensuring habitat enhancement and predator management work is actioned where possible. We do not support this regulation change as presented.

Proposed Regulation Change: Thinhorn Mountain Sheep – Dunlevy and Schooler populations

<https://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/ahte/hunting-trapping/thinhorn-mountain-sheep-dunlevy-and-schooler-populations>

Data and science-based evidence is inadequate and inventory work is not comprehensive enough to support this decision. While there has been targeted inventory on both the Dunlevy and Schooler herds, a lack of comprehensive data suggests that there are gaps which is acknowledged in the government's rationale for this regulation change.

The rationale sights a movement study. The lead Masters Student on that study also states that the herd may be at maximum carrying capacity and that moving to Limited Entry Hunting may actually cause an increase in harvest numbers long term if not carefully managed. In other words,

if the system is not broken, why fix it, particularly since sheep are protected with the full curl/age harvest restriction. Additionally, sheep harvest is relatively low for these population units.

In closing, based on the governments rational there is a lack of data supporting a change to a Limited Entry Hunt. Resources would be better focused on habitat enhancement, predator management and if increasing sheep populations was a focus, reducing elk numbers would be a much more effective outcome. Additionally, no alternatives to Limited Entry Hunting are presented when in fact government could consider alternate strategies such as an archery only season for example. We do not support this regulation change as presented.

We feel that the provincial government is in many cases relying on a mechanism, Limited Entry Hunting implementation, which fails to address the primary issues that may contribute to the problems outlined. We feel that there needs to be a clear line where science and data are acknowledged and management strategies that can address the root cause of the issue are implemented. In all three cases listed above this has clearly not been the case.

In the situation where there are Indigenous community concerns around hunter numbers on the landscape, a proactive and co-management strategy should be entertained. There are numerous solutions that can be reviewed that may be of greater benefit to Indigenous communities. This is yet another example of a government failing to entertain a proactive approach to wildlife management and falling back on a Limited Entry Hunting management tool that lacks effectiveness in many cases.

In closing, as previously mentioned, we encourage you to carefully consider these proposals and engage on the following site: <https://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/ahte/hunting-trapping>. Your feedback will be a factor in the decision-making process on the outcome of these proposals. The deadline for comment is March 22, 2024, at 4:30 PM, so be sure to comment in a timely manner. We cannot emphasize enough the importance of submitting your comments.