

Day, Kristin ENV:EX

From: Nicoll, Sara ENV:EX
Sent: Tuesday, May 3, 2011 9:57 AM
To: Correspondence Unit ENV:EX
Subject: FW: Letter from GOABC
Attachments: Backgrounder - Guide Outfitting.pdf; LETTER - Minister Lake. Wildlife Management. 04.29.2011.pdf; PRESS RELEASE. Wildlife Management. 04.28.2011.pdf; TRUMPY REPORT - Harvest Allocation Policy Review.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

From: Lake.MLA, Terry [<mailto:Terry.Lake.MLA@leg.bc.ca>]
Sent: Friday, April 29, 2011 4:39 PM
To: Minister, ENV ENV:EX
Subject: FW: Letter from GOABC

TO FLNRO

From: Jeana Schuurman, GOABC [<mailto:admin@goabc.org>]
Sent: April-29-11 12:39 PM
To: Lake.MLA, Terry
Subject: Letter from GOABC

Dear Minister Lake;

Please find attached a letter from the Guide Outfitters Association of British Columbia (GOABC) regarding wildlife management in BC.

Additional attachments:

- Background – Guide Outfitting
- Press Release – April 28, 2011
- Trumpy Report

Thank you!

Jeana Schuurman
Administration
Guide Outfitters Association of British Columbia
www.goabc.org
Phone (604) 541-6332 or 1-877-818-2688

Wildlife Stewardship is our Priority™



Guide Outfitters
Association of British Columbia

JOIN US FOR OUR ANNUAL FUNDRAISER MARCH 30 & 31, 2012 IN KELOWNA, BC.

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action relying on it. Any communications received in error, or subsequent reply, should be deleted or destroyed.



Guide Outfitters Association of British Columbia

Suite 103, 19140 – 28th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 641-6332 Facsimile: (604) 641-6339 Email: info@goabc.org

June 2010

BACKGROUND

Guide Outfitting in British Columbia

By the late 1800s the world's hunting fraternity knew that British Columbia (BC) harboured one of North America's most magnificent big game populations. Local hunters started guiding services to meet this demand. Guide territories were established in the late 1940s, but it was not until 1961 that legislation provided exclusive rights to guide non-resident big game hunters in a specific area. This became the foundation of the guide outfitting industry in BC. The guide certificate constitutes property and part of the estate of a guide outfitter.¹

The success of this model was recognized and quickly adopted in the Yukon and Northwest Territories. Guide outfitters developed an understanding of wildlife and wildlife habitat within their guiding territory. This ownership increased the sense of responsibility and was the beginning of wildlife stewardship. The big game populations in BC are healthy and growing, due, in part, to science-based wildlife management policies that were developed by government in cooperation with guide outfitters.

Hunters pay for conservation. Since 1981 license surcharge dollars from guides, hunters, trappers and anglers have risen over \$100 million in BC. These funds are administered through the Habitat Conservation Trust Foundation (HCTF) and have resulted in more than 2,000 wildlife management and habitat enhancement projects. Forty percent (40%) of these funds are generated by the licenses, tags, royalties and fees from non-residents.

A guide outfitter is an entrepreneur with the leadership qualities, business acumen and organizing ability necessary to assist clients achieve their specific objective in British Columbia's outdoors.² Guide outfitters are the founders of the tourism industry and an important part of the outdoor heritage of BC. They enjoy showcasing "super, natural British Columbia" and derive great satisfaction from their clients' enjoyment. More than 5,000 hunters come to BC each year and spend more, per day, per capita, than any other visitor to our province. The guide outfitting industry in BC generates about \$116 million of economic activity each year.³

The Guide Outfitters Association of British Columbia (GOABC) was established in 1966 and currently represents more than 80% of the guide outfitters in BC, Yukon Northwest Territories and Nunavut. Currently, there are 233 licensed guide outfitters in the province who directly employ over 2,000 people. Guide outfitting operations are typically family-run businesses, and many have been passed down from one generation to the next. According to a 2008 GOABC survey 76% of the membership derives their primary source of income from guide outfitting. The guide outfitting industry is an important contributor to the health and well-being of the economies in rural communities.

The GOABC is committed to maintaining and enhancing a strong and stable guide outfitting industry in British Columbia that will offer the highest quality wilderness experiences in North America. A primary objective of the GOABC is to promote the continued economic viability of the industry so that guide outfitters can experience reasonable return on their investment and continue to earn a sustainable livelihood from their businesses in the future.

If you have any questions please contact the Guide Outfitters Association of British Columbia at (604) 541-6332.

¹ Wildlife Act, Sec 64.1

² Rutledge, L. (1989). *That Some May Follow: The History of Guide Outfitting in British Columbia*. Cloverdale. Friesen.

³ The Guide Outfitting Industry in BC: An Economic Analysis of 2002



Guide Outfitters Association of British Columbia

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MINISTRY OF ENVIRONMENT
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April 29, 2011

Dr. Terry Lake
Minister of Environment
MLA, Kamloops-North Thompson
East Annex, Parliament Buildings
Victoria, BC
V8V 1X4

RE: Impact of the new Harvest Allocation Policy

Dear Minister Lake:

Guide outfitters are the founders of the tourism industry and an important part of the outdoor heritage of British Columbia. Currently there are 233 licensed guide outfitters in the province who directly employ over 2,000 people. Guide outfitting operations are typically family-run businesses, and many have been passed down from one generation to the next. The Guide Outfitters Association of British Columbia (GOABC) was established in 1966 and currently represents 80% of the guide outfitters in the province. The vision of the GOABC is to advocate for a healthy guide outfitting industry and enhance the economic viability of our members.

Wildlife Management

Wildlife populations in British Columbia are generally managed very well and many species are on general open seasons. The harvest of some species is more closely monitored and shares are allocated between resident recreational hunters and guided hunters. The Harvest Allocation Policy dictates the harvest shares of wildlife between stakeholders. For resident hunters this share is managed through Limited Entry Hunting (LEH), a lottery system that controls how many hunters can legally hunt a given species in a specified area. For guide outfitters this share is managed with quotas.

When allocation occurs stakeholders may have different perspectives on how the sharing should be done. Our industry needs sound, science-based wildlife management and a regulatory framework that provides business certainty. The GOABC believes the commercial sector should have relatively predictable shares to help our members make business decisions for the long term. The GOABC does not oppose resident hunter priority or hunter recruitment and retention. The GOABC does not advocate for putting all hunts on LEH for resident recreational hunters.

Unintended Consequences

The GOABC accepted the new Harvest Allocation Policy in principle because we believed in the Guiding Principles and understood that government would conduct a 3-year review. We were told that government would not protect individual guide territories, but would support the viability of the guide outfitting industry.

Some unintended consequences of the new policy came to light during its implementation:

- Competition between stakeholders and a loss of wildlife stewardship
- Economic impact to guide outfitting industry

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Guide Outfitters Association of British Columbia
April 29, 2011

The GOABC predicted \$6-9 million/year loss to our industry starting in 2012. It was clear to us that the impacts were substantially larger than originally anticipated. Government hired Chris Trumpy to do an economic impact analysis on the new policy. The Trumpy Report concluded that the policy meets the objectives of transparency and consistency, but fails to provide fairness and equity. Full implementation of the new Harvest Allocation Policy will have severe unintended consequences for the guide outfitting industry and wildlife stewardship.

Guide outfitters are stewards of the land and maintain long-term perspectives on wildlife management. We want a regulatory framework that meets intended objectives, respects wildlife and provides economic viability for our industry. This matter needs to be resolved so that stakeholders can move forward on wildlife stewardship initiatives.

We request your endorsement of the recommendations in the Trumpy Report to help mitigate the financial impact of the new Harvest Allocation Policy to our industry.

Please call 604-541-6332 if you have any questions.

Sincerely,



Mark Werner
President



Scott Ellis
Executive Director



Guide Outfitters Association of British Columbia

Suite 103, 19140 - 28th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@goabc.org

PRESS RELEASE

FOR IMMEDIATE RELEASE

Date: April 28, 2011

RE: Wildlife Management in British Columbia

The vision of the Guide Outfitters Association of British Columbia (GOABC) is to advocate for a healthy guide outfitting industry and enhance the economic viability of our members. Guide outfitting operations are typically family-run businesses, and many have been passed down from one generation to the next. Most licensed guide outfitters are residents of British Columbia. The guide outfitting industry is an important contributor to the health and well-being of the economy in rural communities. Our industry needs sound, science-based wildlife management and a regulatory framework that provides business certainty.

Wildlife populations in British Columbia are generally managed very well and many species are on general open seasons. The harvest of some species is more closely monitored and shares are allocated between resident recreational hunters and guided hunters. When allocation occurs stakeholders may have different perspectives on how the sharing should be done. The GOABC believes the commercial sector should have relatively predictable shares to help our members make business decisions for the long term. These must be consistent with wildlife stewardship and conservation.

The GOABC would like to clarify our position on several issues regarding wildlife management in British Columbia:

1. Resident Priority
The GOABC accepts resident hunter priority.
2. Hunter Recruitment and Retention
The GOABC accepts hunter recruitment and retention.
3. Limited Entry Hunting (LEH)
The GOABC does not advocate for putting all hunts on LEH. Biologists decide which hunts need to be managed with LEH and quota for residents and guide outfitters respectively.
4. Allocation Policy
The GOABC accepted the new Harvest Allocation Policy in principle because we believed in the Guiding Principles and understood that government would conduct a 3-year review. We were told that government would not protect individual guide territories, but would support the viability of the guide outfitting industry.

Some unintended consequences of the new policy came to light during its implementation:

- Competition between stakeholders
- Economic impact to guide outfitting industry

The GOABC predicted a \$6-9 million/year loss to our industry starting in 2012. It was clear to us that the impacts were substantially larger than originally anticipated. Government

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PRESS RELEASE – Wildlife Management
April 28, 2011

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Our province is blessed with one of the richest and most diverse wildlife populations in North America. Guide outfitters are stewards of the land and maintain long-term perspectives on wildlife management. We want a regulatory framework that meets intended objectives, respects wildlife and provides economic viability for our industry. This is not only important for our sector; wildlife has an iconic significance in our province and all British Columbians have an interest in the long-term sustainability of wildlife management.

For more information please contact:

Scott Ellis, Executive Director
Guide Outfitters Association of British Columbia
Suite #103, 19140-28th Avenue
Surrey, BC
V3S 6M3
Toll Free: 1-877-818-2688

Ref: 176192

April 13, 2011

Mark Werner, President
Guide Outfitters Association of British Columbia (GOABC)
Via email: info@bcguideoutfitters.com

Rodney Wiebe, President
British Columbia Wildlife Federation (BCWF)
Via email: rwiebe6@shaw.ca

Dear Mr. Werner and Mr. Wiebe:

Re: Chris Trumpy Report: Harvest Allocation Policy Review

Please find attached the report entitled "Harvest Allocation Policy Review" developed for the Ministry of Forests, Lands and Natural Resource Operations by Mr. Chris Trumpy, former Deputy Minister. Please share this report with other members of your organization.

Over the previous year and a half, the ministry has heard from the GOABC as well as from non-affiliated guides that the full implementation of the Harvest Allocation Policy (including its associated policies and procedures) in 2012 would have severe negative consequences on the guide outfitting industry in B.C. Guides have indicated that full implementation of the policy, including the associated "implementation rules", could result in the loss of millions of dollars to the industry and to the province; and that a number of guides would lose their business equity and their livelihoods. Such dramatic impacts were not intended when the Harvest Allocation policy was originally signed in 2007. It was therefore imperative that the ministry explore these impacts prior to fully implementing the policy.

In order to better understand these impacts, the ministry contracted Mr. Trumpy to perform a qualitative analysis on the effects of implementing the Harvest Allocation Policy on the operation and viability of the guide outfitting industry. His review and recommendations were to respect the principles of the policy, including the principle of resident hunter priority. For this reason, the terms of the contract prohibited any recommendations that would affect the initial 75:25 percent split used in the allocation calculator, or the "minimum shares" guidelines for resident and guided hunters.

Page 1 of 2

As you review the attached report, you will see that Mr. Trumpy confirms that the Harvest Allocation Policy is both transparent and consistent. However, he has identified that the policy fails to meet the core principle of fairness. Specifically, the report indicates that the policy is too inflexible to deal with the unique circumstances that exist throughout the province. These include factors such as the temporary circumstances of individual guides, access differences between guiding territories, and the behaviour of individual guides which can impact harvest allocations to other guides.

In response to these issues, 11 recommendations are outlined in the report. Some of these recommendations will raise concerns with both the GOABC and the BCWF. Therefore, it is important that there be meaningful dialogue between ministry staff and your organizations on the report before any final decisions are made.

On behalf of your organizations, we are asking you to please provide a formal response to the report by May 13th, 2011. Your feedback should include an analysis on each of 11 recommendations, and how they may affect the interests of your organization. After receiving your input, ministry staff will be setting up meetings with the executives of your organizations to discuss the content of the report, which recommendations should receive action, and how the Harvest Allocation Policy implementation should proceed.

Thank you for your help in ensuring that B.C.'s Harvest Allocation Policy supports a strong and viable guide industry while ensuring resident hunters maintain priority access to wildlife.

Sincerely,



Steve Thomson
Minister

Attachment

pc: Honourable Pat Bell, Minister of Jobs, Tourism and Innovation
Honourable Shirley Bond, Minister of Public Safety and Solicitor General
Donna Barnett, MLA, Cariboo-Chilcotin
Bill Bennett, MLA, Kootenay East
Tom Ethier, Director, Fish, Wildlife and Habitat Management Branch

Reference: 140394

Mark Werner, President
and Scott Ellis, Executive Director
Guide Outfitters Association of British Columbia
103 - 19140 28th Avenue
Surrey BC V3S 6M3

Dear Messrs. Werner and Ellis:

Thank you for your email of April 29, 2011, regarding the new Harvest Allocation Policy.

I appreciate that you took the time to share your thoughts with me. Due to the recent realignment of government, this topic now falls under the purview of the Ministry of Forests, Lands and Natural Resource Operations.

Ministry of Environment staff are continuing to work closely with our colleagues at the Ministry of Forests, Lands and Natural Resource Operations. I have shared a copy of your enquiry with the Honourable Steve Thomson, Minister of Forests, Lands and Natural Resource Operations, for his review and consideration.

Thank you again for writing.

Sincerely,

Terry Lake
Minister of Environment

cc: Honourable Steve Thomson, Minister of Forests, Lands and Natural Resource
Operations



COPY

Reference: 140394

MAY 16 2011

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and Scott Ellis, Executive Director
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April 29, 2011

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Guide Outfitters Association of British Columbia
April 29, 2011

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Scott Ellis
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2 of 2



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Suite 103, 18140 - 26th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@gobc.org

June 2010

BACKGROUNDER

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By the late 1800s the world's hunting fraternity knew that British Columbia (BC) harboured one of North America's most magnificent big game populations. Local hunters started guiding services to meet this demand. Guide territories were established in the late 1940s, but it was not until 1961 that legislation provided exclusive rights to guide non-resident big game hunters in a specific area. This became the foundation of the guide outfitting industry in BC. The guide certificate constitutes property and part of the estate of a guide outfitter.¹

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PRESS RELEASE

FOR IMMEDIATE RELEASE

Date: April 28, 2011

RE: Wildlife Management in British Columbia

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PRESS RELEASE -- Wildlife Management
April 28, 2011

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Scott Ellis, Executive Director
Guide Outfitters Association of British Columbia
Suite #103, 19140-28th Avenue
Surrey, BC
V3S 6M3
Toll Free: 1-877-818-2688



Ref: 176192

April 13, 2011

Mark Werner, President
Guide Outfitters Association of British Columbia (GOABC)
Via email: info@bcguideoutfitters.com

Rodney Wiebe, President
British Columbia Wildlife Federation (BCWF)
Via email: rwiebe6@shaw.ca

Dear Mr. Werner and Mr. Wiebe:

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Page 1 of 2

Ministry of Forests, Lands and
Natural Resource Operations

Office of the Minister

Mailing Address:
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Victoria, BC V8W 1X4
Location: Parliament Buildings

Tel: (250)387-6240
Fax: (250)387-1040
Website: www.gov.bc.ca/for/

As you review the attached report, you will see that Mr. Trumpy confirms that the Harvest Allocation Policy is both transparent and consistent. However, he has identified that the policy fails to meet the core principle of fairness. Specifically, the report indicates that the policy is too inflexible to deal with the unique circumstances that exist throughout the province. These include factors such as the temporary circumstances of individual guides, access differences between guiding territories, and the behaviour of individual guides which can impact harvest allocations to other guides.

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Thank you for your help in ensuring that B.C.'s Harvest Allocation Policy supports a strong and viable guide industry while ensuring resident hunters maintain priority access to wildlife.

Sincerely,



Steve Thomson
Minister

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Tom Ethier, Director, Fish, Wildlife and Habitat Management Branch

PROVINCE OF BRITISH COLUMBIA

Harvest Allocation Policy Review

CHRIS TRUMPY

3/31/2011

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March 31, 2011

Mr Tom Ethier
Director, Fish, Wildlife and Habitat Management Branch
Ministry of Forests, Lands and Natural Resource Operations

Dear Tom

Please find enclosed my report on the Harvest Allocation Policy. Wildlife management is a challenge and I hope this helps in your deliberations. I received a great deal of assistance in my work from Ministry staff without which I would not have been able to complete this project. You have many committed and passionate people who were very patient with me.

The guide industry, represented by GOABC and its executive as well as unaffiliated members I met with, also provided much insight and constructive commentary as I worked through the issues.

While I did have two discussions with the BCWF they were very high level.

The conclusions and recommendations however are mine and I would be pleased to discuss them with you at your convenience.

Sincerely

Chris Trumpy

EXECUTIVE SUMMARY

The full implementation of the new Harvest Allocation Policy and Procedures (the allocation policy) will have a material impact on the guide outfitting industry in British Columbia. Although the new policy is transparent and consistent, it is too inflexible to deal with the diversity of circumstances that exist throughout the province. To accommodate the unique circumstances throughout the province changes to the allocation policy are proposed which push responsibility to respond to regional differences out to regional managers.

Recommendations are provided for consideration which will deal with these issues but they will require some further analysis. No changes should be made without discussions with all user groups.

RECOMMENDATIONS

Recommendation 1

The split between resident and guided hunters should not be set by species at the regional level using the new allocation model. While the model should inform the decision, the Ministry should also consider actual splits using data available for the last 10 years and circumstances unique to each region. A base level of guided hunter split should be available to every guide but regional managers should have some discretion to allocate individual guide share above the base level up to a regional split determined by the Ministry.

Recommendation 2

The splits should be set, beginning in 2012, for a minimum of 10 years.

Recommendation 3

Allocation within a region to individual guides should consider access, level of resident hunter activity and be determined by the regional manager. The reasons for variances from the base level of regional splits should be disclosed.

Recommendation 4

Individual guides with small allocations (less than 5 animals over a 5 year period) should be permitted to harvest all their allocation in a single year provided there is no impact on population sustainability.

Recommendation 5

All of the allocation in areas where there are no guide territories should be allocated to resident hunters.

Recommendation 6

Species on GOS for residents should not be on quota for guides.

Recommendation 7

If guides in a region fail to use their allocation over a two or three year period then it should be made available on a temporary basis to residents through a one or two year increase in LEH authorizations where such actions have no impact on population sustainability. There would be no possibility for reduction to guide split until the end of the 10 year period.

Recommendation 8

Regional managers should have access to a wide range of tools to support industry achievement of its split, at both the regional and individual guide level. Tools dropped in the new policy should be reconsidered and new options explored provided they are consistent with good wildlife stewardship.

Recommendation 9

Guides not utilizing their allocation should be encouraged or required to transfer it to guides in adjacent territories provided there are no impacts on population sustainability.

Recommendation 10

The Ministry needs to clarify its policy for vacant guide territories to provide certainty for the industry. Fractional sales which provide marginal additions to strengthen existing operations should proceed.

Recommendation 11

The Ministry should consider facilitating the consolidation of guide territories in regions where small territories are the norm to encourage more viable operations.

INTRODUCTION

The purpose of this report is to provide the Ministry of Forests, Lands and Natural Resource Operations with an assessment of the effects of the Harvest Allocation policies and procedures and implementation rules, scheduled for full implementation in 2012, on the operation and viability of the BC Guide Outfitting industry.

The work undertaken consisted of review of the allocation policy and procedures with extensive briefings with:

- Ministry staff, including headquarters and regional staff responsible for the implementation of the policy;
- The Guide Outfitters Association of British Columbia (GOABC) executive and each of their regional vice presidents;
- Non GOABC affiliated guides in the Cariboo Region; and
- Several experts in the field.

High level discussions were also held with the British Columbia Wildlife Federation (BCWF).

There is little doubt that the implementation of the allocation policy will affect the value and viability of many guide outfitter territories. The Ministry's policy for valuing new guide territories for sale as well as industry practice is to estimate value based on the number of animals available to the guide. Since there is a reduction in the number of animals available to most guides the policy will reduce values.

While recent currency fluctuations, economic events and animal quality are also impacting the industry generally, the impact is uneven. Guides primarily dependant on the US market and relatively low value hunts have been hit harder in the past two or three years relative to those who offer higher value hunts for animals unique to BC such as Roosevelt Elk and Stone Sheep. Guides with a more diverse client base also report being able to weather the last two years better than their peers.

The industry has estimated the cost to them of implementing the allocation policy at \$8M annually. This estimate is high for a number of reasons explained in detail in the body of the report but the impact is still substantial.

This report has been organized in the following manner

- Overview of wildlife management objectives
- A brief history of why the current allocation policy was developed
- A description of the allocation model and implications for hunter groups
- A more detailed section on the implications on the guide industry
- Impact of US recession
- Assessment of GOABC estimate of revenue Loss
- Conclusions
- Recommendations

No changes to the current allocation policy should be undertaken without discussions with all user groups.

Three terms are important to define at the outset of this report:

- Split – refers to the relative proportion of animals available to be harvested allocated between guided hunters and resident hunters – a 75/25 split is 75% resident and 25% guides. Splits are different for each species in each region of the province. Splits generally apply for five year periods, called allocation periods.
- Allocation – is the number of animals made available to guides and resident hunters over an allocation period and can apply, in the case of guides to both all guides in a region and to each individual guide (i.e. an individual allocation).
- Quota – is the number of animals (e.g. moose) available on an annual basis to an individual guide for their clients.

WILDLIFE MANAGEMENT OBJECTIVES

Managing wildlife is a very difficult. The primary goals of the Ministry, as defined through the Wildlife Program Plan, are to conserve species and maintain the health of wildlife populations, and to provide a variety of opportunities for the sustainable use, enjoyment and appreciation of wildlife. There is debate in the wildlife biologist community about what constitutes sustainable use and healthy populations and this is further complicated by changes taking place due to climate change, and particularly the pine beetle infestation which has changed the landscape throughout a significant portion of the province.

The *Wildlife Act*, ministry policy frameworks and its practises attempt to balance the following four interests:

- (i) Conservation – The primary goal is to ensure healthy, sustainable animal populations;
- (ii) First Nations – First Nations have traditional rights to hunt and fish which are only fettered by conservation requirements;
- (iii) Resident Hunters – Residents of British Columbia (approximately 90,000) hunt whether for sport or food. Resident hunting rights are limited for certain species of animals using a variety of legal tools such as limited seasons, male only hunts and limiting the number of hunters; and
- (iv) Guided Hunters – There are about 240 guide outfitter territories in British Columbia. All non-resident hunters must use a guide and guides have exclusive rights in their territories for non-resident hunters. Guides are restricted by season and species using similar tools as those which apply to resident hunters.

Although resident hunters have priority over non-resident hunters in policy and practice, the Ministry also supports having a viable guide outfitting industry in British Columbia.

In theory the Ministry collects wildlife inventory data, and conducts population assessments, to estimate the number of animals available for harvest. In practise the quality of inventory information, due to resource limitations, which go back decades, is not very good for many wildlife populations. Estimates for the number of animals available for harvest depend on the quality of information available, the sex and age composition of animals, habitat suitability, predation levels and other factors.

For species with very healthy populations, such as Black Bear, there are general open seasons (GOS). With a GOS, subject to annual limits on the number of animals a hunter is allowed to kill, there are no limits on the number of hunters who can hunt or the number of clients a guide can take out. For other species, where demand exceeds sustainable use, ministry biologists estimate the number of animals that can be harvested without jeopardizing population

sustainability before allocating it to the user groups. For example, let's say a region has a moose population estimated at 13,000 animals and that the sustainable harvest level is estimated to be 10%. That means that this level of harvest can proceed and the herd will remain at a level of 13,000. A 10% harvest level for a herd of 13,000 means that 1,300 animals can be harvested annually.

Before the 1,300 animals can be allocated for use, First Nations needs must be accommodated and set aside. If First Nations required 650 moose for food, social and ceremonial uses, then that leaves 650 animals for resident and guided hunters. This is referred to the annual allowable harvest (AAH). Resident hunters have priority and this is reflected in the actual allocation split between the two user groups and the Resident Hunter Priority policy.

Allocation is an issue only for those species where hunting pressure exceeds the number of available animals and this varies by region and species. According to ministry policy, allocation is intended to prevent or reduce causes for conflict between hunter groups. The animals which fall under the allocation policy, by region, are set out in the table below:

Species	Regions
Grizzly Bear	1,3,4,5,6,7A,7B
Elk (Bull)	1,2
Elk (Archery)	1
Moose (Bull)	3,4,5,6,7A,8
Goat	3,4,5,6,7B,8
Bighorn Sheep	3,4,8
Caribou (Bull)	5, 6
Thinhorn Sheep	6,7B
Elk (Antlerless)	7B
Bison	7B
Moose (Cow)	5,7A

DEVELOPMENT OF THE ALLOCATION POLICY

Prior to 2003 the split of animals between resident and guided hunters was done on a regional basis in negotiations between the regional manager and representatives of the resident and guided hunter communities. While all parties report that this process generally worked well, over time it led to different outcomes throughout the province and in several regions negotiations became quite acrimonious. As special deals were made, often to reflect special circumstances but sometimes for reasons which were not clear, it became increasingly apparent that consistent principles were not being applied across the province.

Beginning in 2003 negotiations were undertaken to develop a province-wide model and policy that could be applied consistently in all regions for all species. The intention was to develop an approach which was consistent, transparent and adaptive while maintaining the primacy of the resident hunter and providing stability for the guiding industry. This work was brought to a close in 2007.

The new model takes away a significant amount of discretion from the regional managers to avoid special deals for any of the user groups. It took over three years of intense discussions to arrive at the allocation model which is scheduled for full implementation beginning in 2012. Representatives of both the BCWF and the GOABC report that they did not get what they wanted out of the process. The BCWF does however feel that there was a deal agreed to by all parties. GOABC feel that there was agreement in principle with significant implementation consultation to be undertaken which, according to them, did not occur.

Prior to 2003, various regional managers adopted different tools to manage the relative splits and allocations, particularly at the level of the individual guide outfitter territory. Most of these will disappear upon full implementation of the policy. The tools used included:

- (i) Allocation of vacant land share to guides – In most regions there are areas which are not occupied by guides. Previous guide allocations included a pro rata share of these areas as if they were guide territories. This had the effect of increasing guide allocations above what their territory alone would justify. Under the new policy all animals attributable to vacant land are allocated to resident hunters.
- (ii) Remote access factor – Some areas are easily accessible by road and heavily used by resident hunters, while others are remote and very difficult to access even with equipment like all-terrain vehicles. In some regions this was recognized and a higher share of animals in remote guide territories was provided to guides operating in those areas. This was usually offset by relatively lower allocations to guides in areas where there was better access for resident

hunters. This tool disappears under the new policy as allocations are set at the regional level, and for guides, are applied at the guide territory level with no consideration of accessibility.

- (iii) Success factors – There is no guarantee of hunting of success whether you are a resident hunter or a guided hunter. Some regional managers, based on experience, provided higher allocations based on how successful a guide has been historically, or on how successful guides were in a region. The irony is that the more successful guides would have a lower success factor and the use of this tool amongst regions varied tremendously. Guide revenue is dependent on the number of hunters not the number of animals killed.
- (iv) Habitat suitability – Under the negotiated model, some regional managers make adjustments to guide shares based on habitat suitability if particular territories are particularly productive.
- (v) Administrative guidelines – Since hunting success is never certain, the Ministry allows guides to harvest more than their annual allocation in any one year provided they do not exceed their total over the 5 year allocation period. Administrative guidelines remain in place under the new policy.

THE NEW MODEL

The allocation model involves two steps which adjust the allocation from a starting point assumption of 75% resident share and 25% commercial share to a final allocation which will apply for the next five year period. Final results are subject to minimum shares for each user group.

In the first step, the relative importance of each hunt is determined for each region. Importance is measured, for the commercial hunters, by the total value of the hunt (number of hunters times price) and in the case of resident hunters by demand. The value for each allocated hunt is ranked across the province, with the highest being a 10 (top 10 percentile) and the lowest being a 1 (lowest 10 percentile). Ranking is forced and each 10% band has approximately the same number of hunts in it.

Demand for residents is based on a formula that calculates the number of potential hunters by species by region. The formula is designed to provide an estimate of the potential number of hunters who would hunt if there was a GOS for each species in each region.

Where there are differences between the relative ranks the allocation to the higher valued group is increased. For each point difference a reallocation of 2% of share occurs. For example if Grizzly Bear hunts in a region have a guide rank of 5 and a resident rank of 3 then the guide allocation would increase by 4% (5 – 3 times 2%) This would mean that the guide share of the Grizzly Bear hunt in this region would increase to 29% and the resident share would decrease to 71% (from the starting points of 25% and 75% respectively). The larger the gap, the higher the adjustment toward the user group which places a higher value on the hunt.

The use of a dollar value in the case of the guided hunters and demand in the case of residents as proxies of relative importance to each user group is not perfect. In the case of the guided hunters it does not take into account the importance of the species to commercial viability of individual operations in a region. For residents the number of applications to hunt is likely based to some extent of the likelihood of being drawn, proximity to urban areas and food needs all of which means that there is more pressure in any area with good access.

The second step in the model involves a measure of utilization for each of the user groups. Utilization is based on the proportion of the previous period's allocation that was actually harvested by each group and is measured on a 10 point scale where 10 means 91% to 100% utilization and a 1 means 0% to 10% is utilized. Again for each point difference a reallocation of 2% of share occurs. Using the example above where our step one adjusted shares are 71/29 and both user groups utilize all their animals then there would be no adjustment. However, if either party harvested less than their full allocation then the model makes an adjustment to increase the allocation of the other user group.

In the case of resident hunters the Ministry attempts to assure the resident hunters achieve their share by issuing Limited Entry Hunting (LEH) authorizations based on assumptions of likely success. For example if history suggest that resident hunting moose in a region are successful 50% of the time and there are 100 moose available for residents that the ministry would issue 200 LEH permits (200 permits times 50% equals an expected harvest of 100 animals). Under the policy, guides do not have success factors although the Ministry attempts to accommodate this with the use of liberal administrative guidelines.

Administrative guidelines are a tool which regional managers use to allow guides to legally harvest more than their annual allocation provided they do not exceed their five year allocation and are intended to provide guides with some flexibility. While these work reasonably well for guides with large quotas they do not provide small quota guides much flexibility.

The real challenge for the guides with the model is that it depends on all guides in a region achieving their individual allocations. The reality of the industry is that due to the number of

guides in many of the regions of the province there can be inactive or unsuccessful guides so that at a regional level guides do not harvest their share of the allocation.

A simple example can be used to illustrate this point using the previous moose example. The split is 77/23 and 130 animals are available for harvest. Resident hunters are allocated 100 moose while the guided hunters are allocated 30. Based on experience it is estimated that residents have a 50% harvest success rate and 200 resident LEH authorizations are issued. This results in 100 moose being killed (a 10 for utilization).

The region has two guides each with an allocation of 15 moose (a total of 30 moose or 23% of the available animals). One of the guides kills 15 animals while the other guide who is trying to sell his business only manages to kill 2. The guides have harvested 17 of their 30 animals or 57% (a 6 for utilization) while the residents fully utilized their share. Under the policy resident utilization is higher and this would result in a reduction in the allocation to guides of 8% (10 – 6 times 2%). The number of animals allocated to guided hunters would fall from 30 to 20 animals as the split shifts to 85/15. The reduction would be shared amongst the two guides so each would see a reduction in their allocation of 5 animals. The guide who fully utilized his share would see his revenue potential from moose harvest fall by 33% because of a failure by the other guide to harvest his share.

This simple example suggests that the allocation policy will have both negative revenue impacts and also produce unfair outcomes.

IMPLICATIONS ON THE GUIDE OUTFITTING INDUSTRY OF THE NEW ALLOCATION POLICY

Businesses and governments coexist. Governments allow business to operate subject to rules and regulations which ensure that no harm is done, for example, to the environment and that basic worker rights are protected. Businesses value a stable regulatory framework and stable tax or fee regimes. They also value consistency and transparency in regulatory behaviour and sound administrative and judicial appeal processes. Generally speaking the consequences of being a poor operator are accepted.

A critical factor in designing a regulatory framework is that it produces the proper incentives for behaviour that will result in outcomes which benefit society. If a framework is poor it will not produce the intended result or it will have negative or unintended consequences.

The new allocation model developed by the Ministry is intended to meet these regulatory tests but fails in a couple of respects. An assessment of the model against a regulatory model follows. A good model is one which provides

1. clear objectives;
2. transparency;
3. proper incentives;
4. certainty; and
5. equity and fairness.

Clear Objectives

The objectives of the allocation model are not explicitly stated but based on discussions with ministry officials it appears that the intent of the Ministry is to identify the sustainable harvest level (the AAH) that will maximize the number of hunting opportunities. Ministry policy attempts to ensure that the AAH is achieved. For resident hunters this is achieved by issuing more LEH authorizations than animals available, a system which recognizes that not all hunts are successful. For guides the use of administrative guidelines and not placing restrictions on the number of hunters a guide can take out are intended to produce the same result. However neither of these mechanisms accounts for guides who are not actively pursuing their allocations or have small allocations which make the administrative guidelines useless.

Two observations are worth making about the objective. The first is that for resident hunters the Ministry is assuming responsibility for the risk that resident hunters are not overly successful while with the elimination of the use of success factors for guides they are indicating that they are unwilling to take any similar risk on behalf of guides. In fact if residents are wildly successful then the consequences of a reduction in the AAH could be felt by both user groups.

The second observation is that an objective which maximizes harvest may not be consistent with a wildlife management objective of having more highly valued (i.e. older) animals.

Transparency

The model and policy is transparent. It is publicly available and although complex the Ministry has produced documents which explain in detail how it works. Notwithstanding this the model is not well understood by the guides I talked to directly. They do not understand why the allocations they have built their businesses on are changing as dramatically as they are and do not appear interested in explanations. Responsibility for this breakdown in communications does not rest exclusively with government.

Proper Incentives

One of the key features of the model is that it “rewards” consumption which in this case is defined as harvest success. This is because failure of either resident hunters or guides to harvest their allocation can result in a reduction in their split share. Because this reallocation occurs at the regional level successful guides are at the mercy of less successful guides who fail to harvest their portion of the allocation. The intent of this is to encourage the full utilization of allocation but the consequences do not appear to be appropriate. A concern raised by a number of guides is that the focus on achieving annual harvest targets has a negative impact on the quality of animals which affects their ability to sell hunts. This is a much broader issue of appropriate wildlife management objectives.

Certainty

The model provides certainty because it establishes fixed allocations looking forward five years.

Equity and Fairness

Equity is a test of consistency. If businesses in the same circumstances are treated the same under a policy then it can be said to be equitable. The features of the new allocation model assure that guides in similar circumstances are treated the same so it could be considered equitable. However there are differences between the treatment of resident and non-resident hunters in areas such as elimination of the use of success factors for guides and government risk management which do not appear equitable. Resident hunters appear to have a better chance of achieving their allocations with a larger number of LEH authorizations issued relative to animals expected to be harvested. Having open seasons for Stone Sheep for resident hunters and guides on allocation is another example of an inequitable application of policy.

Equity should not however be confused with fairness.

The tests for fairness are more subtle and subjective because they require the introduction of the concept of relativity. For a policy to treat businesses fairly it has to recognize that businesses which are in different circumstances should be treated differently. For example if two guide territories of the same size exist, one with excellent habitat and one with poor habitat an equitable policy would allocate each the same number of animals but this would not be fair. Another example of failing the fairness test is the impact that guides who do not achieve their allocation can have on those who are successful which was discussed earlier.

Government policies generally attempt to be both equitable and fair but it is extremely hard to achieve both. One reason that government regulations tend to be so extensive is that they attempt to anticipate all outcomes and prescribe regulation to achieve a degree of fairness.

When government regulation provides regulators with little discretion there are inevitably unfair results. Where regulators have too much discretion the result is that decisions are described as inconsistent.

IMPACT OF US RECESSION

Hunting is a discretionary activity and for most guides in BC is priced in \$US where the majority of hunters reside. While many resident hunters rely on hunting for food, which becomes even more important during an economic slowdown, non-resident hunters using a guide could acquire food more cheaply than by coming to British Columbia to hunt.

Basic economic and behavioural theory would hold that when income falls people tend to cut discretionary spending. Based on discussions with a number of guides and GOABC it is clear that the troubled US economy has had a significant impact on business over the past two or three years. Guides who previously booked two years ahead are scrambling to fill current year hunts and many are failing to sell all their hunts. The impact has been felt hardest by that segment of the industry offering low value hunts whose target group is those with less discretionary income.

Economic theory would also hold that as incomes recover so does spending on discretionary services like hunting. Guides who have been in the industry for decades report that in prior US recessions demand always recovered as the economy improved and the harvest data appears to support this assertion. Some guides report that even now there are signs of more interest in upcoming hunts than they have seen over the last two seasons.

One of the features of the new allocation model is that it rewards the use of allocation. This means that the failure of the guides to use their allocation due to a decline in discretionary spending in their client market will inevitably lead to a decline in their share of future hunts. While this shift makes sense from the perspective of allowing access to the number of animals available, it fails to recognize temporary declines in the use of allocation caused by the inability to sell hunts into a declining US economy. The industry is hit twice – once by the inability to sell hunts available due to slow demand – and again when the result of this is fewer hunts to sell when demand recovers. This is not consistent with a stated Ministry desire to support the industry.

ANALYSIS OF GOABC IMPACT ASSESSMENT OF THE ALLOCATION POLICY

On July 10, 2010, GOABC wrote the Minister responsible for the allocation policy and provided an estimate of the revenue impact of the allocation policy on the guide outfitting industry. The analysis estimated the annual impact at over \$8 Million in revenues and is a combination of lost revenues to the industry and lost revenue to the Crown. The following is a brief description of the model, its underlying assumptions and weaknesses.

The GOABC information is set out in the table below:

ANNUAL REVENUE LOSS (\$,000)							
REGION	LOCATION	HUNT VALUE	HST	LICENCES	TAGS	ROYALTIES	TOTAL
3	THOMPSON	170	10	3	6	2	191
4	KOOTENAY	1,465	88	25	68	19	1,665
5	CARIBOO	1,414	85	23	56	23	1,601
6	SKEENA	1,877	113	28	64	35	2,117
7A	OMINECA	1,751	105		82		1,938
7B	PEACE	840	50	5	2	7	904
8	OKANAGAN	337	20	16	29	14	416
TOTALS		7,854	471	100	307	100	8,832

The basic premise is that since there is a reduction in the number of animals available to the guides, revenues fall. The basis for the revenue estimate is the hunt value reported to the Ministry which is used in the allocation calculation. The last four columns are government revenues that flow from commercial hunts and are driven off either the hunt value or the number of animals (in the case of licenses, tags and royalties). The key column is the hunt value column since the others represent government revenues which guides pass onto clients and are not an actual loss in revenue for the guides.

The figures in the table likely overstate the actual revenue loss to guides since not all guides take advantage of their allocations. However, it does provide a reasonable estimate of the loss of potential revenues. Based on discussions with the industry, I feel that a 25% discount to these figures is not unreasonable so the actual revenue loss would be in the neighbourhood of \$6 Million. While current industry numbers are not readily available, studies conducted in 2001 and 2002 put industry guided hunting revenues between \$32 and \$47 Million so that the impact on the industry is more than a 10% decline in revenues.

A number of guides in one region shared some details on their financial operations and it appears they operate on very thin margins. At the individual guide level the impact of this revenue reduction combined with the elimination of tools used by regional managers could prove catastrophic. The industry is very fragmented, with very large multi-million dollar

operations and many very small business people who use guide income to supplement other sources of income like ranching to survive. For the smaller operations guide income is used to pay for fixed costs associated with overall operations and any reduction in income can have a magnified impact on their ability to survive. There is also limited ability in the industry to pass on price increases when the economy is struggling. Hunt prices are generally quoted in \$US with expenses in Canadian dollars and the appreciation of the Canadian dollar is putting some additional pressure on individual guides.

Impact on Territory Value

Guide territories are assets with value that sell in the market place. Their value arises from several factors:

- Exclusivity – the right to guide non-resident hunters in their territory is exclusively the property of the owner of the territory
- Investments – guides build cabins, have horses, boats and in some cases airstrips that form part of their value
- Access to animals – hunts are sold so each hunt has a value. The number of hunts times the value of each hunt represents the potential revenue for a territory.

The new allocation policy, because it generally reduces the number of animals available, reduces the value of territories. The uncertainty created by the introduction of the new policy has resulted in fewer sales or transfers of territories. Based on the loss of potential revenues of \$7.8 Million annually, this will produce a significant loss in territory value.

CONCLUSIONS

1. The model used by GOABC to develop revenue loss projections due to the implementation of the allocation policy contains generally reasonable assumptions. The projections contain a mix of industry and government revenue implications and assume that all possible hunts are undertaken by the industry. No account is made of offsetting resident hunting revenues and the industry admits that all hunts are not undertaken. To be conservative I would apply a 25% discount to the industry revenue figure. However the gross industry impact probably understates the impact for a number of individual guides who will likely fail in the coming years if the new policy is fully implemented in 2012.

2. The challenges faced by the industry at this time extend beyond the allocation policy. They include both temporary and systemic challenges:

- a. Slow US and European economies and Canadian dollar appreciation.
- b. Rising fuel prices.
- c. Quality of product.
- d. Improving access for resident hunters particularly where aggressive pine beetle harvesting and active gas exploration occurs, increasing numbers of resident hunters and the increasing sophistication of resident hunters.
- e. Increasing competition from other parts of the world.

The first two are temporary challenges and as world economies improve it is expected that demand will recover and the industry will be in a position to pass on price increases. The last two are systemic and will continue to impact the industry. The third item is dependent on how wildlife is managed in the province in the future.

3. The specific impacts of implementing the policy are:

- a. Overall the number of animals guides have access to will fall, in some cases dramatically, but there are a few cases where guides will have small increases.
- b. The value of guide outfitting territories will fall where there is a reduction in the number of animals available.
- c. Some guide outfitters will fail.
- d. The incentive to "use or lose" allocation share will result in behaviours inconsistent with good wildlife stewardship.

- e. Successful guides will be negatively affected when other guides in their region fail competitors to harvest animals.
4. Barriers identified by the industry that may prevent guides from achieving full utilization of their allocation are different depending on whether it is from the perspective of an individual guide or at a regional level. At the regional level the biggest barrier is inactive guides who fail to, for a variety of reasons, utilize their quota. At an individual guide level the barriers identified include
- a. Inability to sell hunts due to slow economy.
 - b. Inability to sell hunts due to a decline in the quality of the product.
 - c. Failure of administrative guidelines to accommodate lack of success early in the 5 year allocation period.
 - d. Regional allocations mean that areas with higher resident pressure have the same allocation as areas with low resident pressure. It is generally more difficult for guides in an intensely hunted area to achieve their allocation.
 - e. Elimination of tools used previously to recognize regional circumstances including success factors and access.

RECOMMENDATIONS

The Harvest Allocation Policy is intended to bring consistency, fairness, equity and transparency to a system which was inconsistent, inequitable and not very transparent. In doing so it has failed to be fair because it does not take into account temporary circumstances, access differences, or the impact of individual guide behaviour on other guides. Below I have set out a series of changes which I believe will introduce some fairness into the system, provide guides with more certainty and remain consistent with the intent of the allocation policy.

This set of recommendations should be discussed with GOABC, BCWF and other user groups as appropriate but at the end of the day government should not abdicate its decision making role. It is unlikely that given the positions that have been taken there can be an agreement so discussion should focus on how to implement what the government decides.

It is also critically important that all three parties recognize that ultimately they all want the same outcome which is a healthy, thriving wildlife population. Recognizing this end goal will allow the parties to engage in meaningful discussions about wildlife stewardship for the true measure of success would be an increase in the number of open seasons and increases in the number of animals allocated to both resident and non-resident hunting groups.

The recommendations are based on the following objectives

- Continue to recognize resident priority
- Provide guide industry certainty
- Utilize available animals
- Fairness and equity

Significant authority would be delegated to regional managers with local knowledge compared to the new policy but this is balanced by a need for more transparency in decision making.

Recommendation 1

The split between resident and guided hunters should not be set by species at the regional level using the new allocation model. While the model can inform the decision, the Ministry should also consider actual splits using data available for the last 10 years and circumstances unique to each region. A base level of guided hunter split should be available to every guide but regional managers should have some discretion to allocate individual guide share above the base level up to a regional split determined by the Ministry.

In a region where the Ministry determines the appropriate split is 78% resident hunters and 22% guided hunters, each guide would receive their share of, say, an 18% split. The regional manager would then assess issues including habitat suitability and access to assign the additional 4% available in their region to individual guides. Reasons for variances would be disclosed.

There are unintended consequences of the new policy which have significant negative impacts for the industry. The splits the model produces are a significant part of these unintended consequences which is why this recommendation is made. Different circumstances in different regions require different solutions which are best made at the regional level. The low likelihood of regional agreement of splits by the two user groups leads to the recommendation that the decision on split being made by the Ministry.

Recommendation 2

The splits should be set, beginning in 2012, for a minimum of 10 years.

Five year periods do not provide certainty for industry which is why an extension to 10 years is recommended.

Recommendation 3

Allocation within a region to individual guides should consider access, level of resident hunter activity and be determined by the regional manager. The reasons for variances from the base level of regional splits should be disclosed.

Regional managers are best positioned to make region specific decisions but to avoid problems with past practises reasons for decisions should be disclosed.

Recommendation 4

Individual guides with small allocations (less than 5 animals over a 5 year period) should be permitted to harvest all their allocation in a single year provided there is no impact on population sustainability.

The administrative guidelines are not flexible enough to deal with small allocations. Conservation requirements will override any move to more flexibility but for some species and some guides this change will help them be successful.

Recommendation 5

All of the allocation in areas where there are no guide territories should be allocated to resident hunters.

In regions with large portions of unallocated territory this will cause some hardship to guides because under current policy guide allocation included a share of animals on unallocated lands but the policy rationale for this, given the exclusive rights guides enjoy in their territories, is unclear.

Recommendation 6

Species on GOS for residents should not be on quota for guides.

If there are conservation concerns then restrictions should apply to both user groups. If no conservation concern exists then access should not be limited for either group.

Recommendation 7

If guides in a region fail to use their allocation over a two or three year period then it should be made available on a temporary basis to residents through a one or two year increase in LEH authorizations where such actions have no impact on population sustainability. There would be no possibility for reduction to guide split until the end of the 10 year period.

The ministry objective is to maximize harvest. If guided hunters are not taking advantage of their share then residents should have access to this. The recommendation to make this temporary is based on short term (for example the US recession) causes of the failure of guides to harvest their share. The split between guides and residents would be adjusted at the end of the 10 year period.

Recommendation 8

Regional managers should have access to a wide range of tools to support industry achievement of its split, at both the regional and individual guide level. Tools dropped in the new policy should be reconsidered and new options explored provided they are consistent with good wildlife stewardship.

The new policy limits the flexibility at the regional level to allow the guides to be successful. The challenges and opportunities are different depending on the region but the overarching goal should be successful harvest by both guided and resident hunters and tools should exist at the regional level to allow this to happen.

Recommendation 9

Guides not utilizing their allocation should be encouraged or required to transfer it to guides in adjacent territories provided there are no impacts on population sustainability.

There are a number of reasons that guides may not be using their allocation while their neighbours have hunter demand beyond what is available. Short term transfers should be encouraged.

Recommendation 10

The Ministry needs to clarify its policy for vacant guide territories to provide certainty for the industry. Fractional sales which provide marginal additions to strengthen existing operations should proceed.

In several regions there are significant unallocated lands which could provide opportunities for existing or new guides. It is not clear what the Ministry is planning to do and some clarity is required.

Recommendation 11

The Ministry should consider facilitating the consolidation of guide territories in regions where small territories are the norm to encourage more viable operations.

In some regions there are very large numbers of relatively small territories. As an industry some level of consolidation makes sense and the Ministry should consider what tools it can employ to facilitate this where it makes sense.

GOABC COPY

Terms of Reference

The Contractor will complete an analysis on the effects of the "Harvest Allocation Policy" and its "implementation rules" as it pertains to the operation and viability of the British Columbia guide outfitting industry.

The Contractor must develop and finalize a report that:

1. Provides an assessment of the model used by the Guide Outfitters Association of BC (GOABC) to develop their projected annual revenue losses resulting from implementation of the policy, as communicated to the Ministry on July 8, 2010, including a review of the model inputs for reasonableness.
2. Reviews the current economic challenges faced by the guide outfitting industry in British Columbia, and distinguishes the challenges, and their level of guide industry impacts, between those that are harvest allocation implementation-related and those that are not (e.g. market forces).
3. Examines the specific impacts of implementing the Harvest Allocation Policy on the guide outfitting industry in British Columbia, and how this may impact individual guide outfitters.
4. Review, assess and rank the barriers identified by the GOABC and guides not affiliated with the GOABC, that may have negative economic impacts to the guiding industry, or that may prevent guides from achieving full utilization of their allocations when the Harvest Allocation Policy is fully implemented in 2012. Where feasible identify options to mitigate these barriers while respecting the intent of the policy.
5. Provides recommendations on potential modification to policy implementation in 2012.

The Contractor must be aware that recommending specific changes to contents of the Harvest Allocation Policy document itself is NOT within the scope of this contract, nor are recommended amendments to

- a. the initial allocation of 75% of the annual allowable harvest to resident hunters and 25% to guided hunters, as outlined in the Harvest Allocation Procedure
- b. the "minimum shares" for resident and guided hunters, as outlined in the Harvest Allocation Procedure

However, recommending changes to other aspects of the policy or its implementation are within the scope of this contract (e.g. timelines for full implementation and implementation rules, the use of success factors, AAH determinations and allocations splits for guide outfitter territories, and sharing of quotas between adjacent guiding territories)

From: Hales, Gerad S ENV:EX
Sent: Monday, October 25, 2010 3:17 PM
To: 'Scott Ellis'
Cc: Ethier, Tom ENV:EX; Hatter, Ian ENV:EX
Subject: Harvest Allocation Procedure - Ref # 132562

Dear Mr Ellis:

Thank you for your letter to Tom Ethier, Director of the Fish, Wildlife and Habitat Management Branch, dated October 22, 2010 and regarding the Harvest Allocation Procedure. Mr. Ethier has asked that I respond on his behalf.

In your letter, you state that the GOABC is concerned about the determination of the degree of utilization for resident hunters, and you ask for an explanation as to how the Ministry will be calculating the "average annual number of those animals harvested by resident hunters."

The annual number of category A animals harvested by resident hunters is determined from a number of sources, depending upon the harvest/reporting regime for the category A species in question. For example, for Compulsory Inspected category A species such as grizzly bear, the Compulsory Inspection database is used to determine the annual harvest. In cases where the category A species isn't compulsory inspected, other harvest reporting systems such as the Hunter Sample Reports and/or the LEH Survey Estimates are used to determine harvest. In cases where category A populations only make up a subset of the regional population of a particular species, harvest data is often provided by regional staff, who use the information from the aforementioned databases/reporting systems to determine harvest for those specific category A populations.

Harvest data is summed for each year of the allocation period, and then divided by the number of years in the allocation period to determine the "average annual number of those animals harvested by resident hunters." So for example, if during a 5-year allocation period, resident hunters harvested 7, 9, 10, 8, and 7 individuals of a particular category A species in years 1 through 5 of the allocation period, the average annual number of animals harvested would be 8.2. This is done separately for each category A species currently included in the calculator, and this type of calculation is also how guided-hunter utilization scores are determined.

It should be stressed that utilization calculations are based on the harvest of category A populations only. For example, in some regions, only certain populations of a particular species are considered to be category A (e.g. only goats in a portion of a region are category A). In these cases, we are working to ensure that utilization scores are based on the harvest of these designated category A populations only.

From your letter, it is not immediately apparent to me what parts of the utilization calculation you are concerned with. I hope the above explanation has helped alleviate those concerns, but if not, please do not hesitate to contact me to discuss. If you feel there are inequities in this calculation, I would greatly appreciate having this brought to my attention.

Thank you.

Gerad Hales, R.P.Bio.
 Wildlife Policy Unit Head
 Fish, Wildlife and Habitat Management Branch
 250-356-3089

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Guide Outfitters Association of British Columbia

Suite 103, 19140 - 28th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@ggoabc.org

October 22, 2010

Tom Ethier
Director, Fish, Wildlife and Habitat Management Branch
PO Box 9391 Stn Prov Gov't
Victoria, BC
V8W9M8

RE: Harvest Allocation Procedure

Dear Tom:

We have reviewed the Harvest Allocation Procedure and are very concerned about determining the degree of utilization for resident hunters. Could you please explain how the Ministry of Environment will calculate "the average annual number of those animals harvested by resident hunters"?

Sincerely,

Scott Ellis
General Manager
Guide Outfitters Association of British Columbia

Wildlife Stewardship is our Priority™

Przada, Jennifer ENV:EX

From: Jennifer Johnson, GOABC [info@goabc.org]
Sent: Thursday, April 28, 2011 11:20 AM
To: Minister, ENV ENV:EX
Subject: Request for a meeting with Environment and Land Use Committee members Wednesday, May 04, 2011

Categories: Meeting/Invite Request

Good morning Minister Lake:

Scott Ellis, Executive Director and Michael Schneider, Vice President of the Guide Outfitters Association of BC (GOABC) would like to meet with you next Wednesday, May 04, 2011 regarding the Guide Harvest Allocation Report by Chris Trumpy.

Mr. Ellis and Mr. Schneider are available any time after 9:30 a.m. on the 4th. If your office could let us know what time on the 4th would work best for you or an alternative date and time we would appreciate it.

Sincerely,

Jennifer Johnson
Member & Client Services
Guide Outfitters Association of British Columbia
www.goabc.org
Phone (604) 541-6332 or 1877 818-2688

Wildlife Stewardship is our Priority™



Guide Outfitters
Association of British Columbia

JOIN US FOR OUR ANNUAL FUNDRAISER APRIL 1 & 2, 2011 IN VICTORIA, BC.

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MINISTER'S OFFICE - RECEIVED			
MINISTRY OF ENVIRONMENT			
14785/			
APR 28 2011			
<input type="checkbox"/> Min Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> DM Reply	<input type="checkbox"/> Info/File
<input type="checkbox"/> Send Interim		<input type="checkbox"/> Redirect to _____	
<input type="checkbox"/> cc: _____			
CLIFF# _____			

regrets - apologize for delay -
Thompson is lead

AL rec'd JUN 01 2011

Page 47 redacted for the following reason:

Not Responsive

Reference 133676

November 12, 2010

Wilfred Pfeleiderer
BC Wildlife Federation
101-3060 Norland Ave.
Burnaby BC V5B 3A6

Scott Ellis
Guide Outfitters Association of BC
Suite 103 – 19140 – 28th Avenue
Surrey BC V3S 6M3

Re: Exercise on Recalculating the Harvest Allocation Shares Based on Preliminary Data from the 2007 Through 2009 Hunting Seasons.

The Fish, Wildlife and Habitat Management Branch of the Ministry of Natural Resource Operations committed to recalculate the harvest allocation shares for hunts administered under the Harvest Allocation policy and procedure, using data from the 2007, 2008 and 2009 hunting seasons. These seasons represent the first three years of harvest during the 2007-2011 allocation implementation/transition period.

The purpose of recalculating harvest shares midway through the 2007-2011 allocation period is to provide Branch staff, and the resident and guided hunting community with a sense of how they are progressing with regards to the utilization of respective portions of the annual allowable harvest (AAH) and to provide a preliminary assessment of how allocation shares may change when they are formally calculated for the 2012-2016 allocation period in 2012.

Please find attached a copy of the complete harvest allocation calculator, including the calculated harvest shares based on preliminary (and incomplete) data (see the 'Final Allocation Rounded' column in the "Calculator" worksheet).

When reviewing the calculator, please note that:

1. Calculations of both relative importance and utilization use data only from years that hunts have been allocated using the Harvest Allocation policy. This means, for the hunts that came online with respect to the policy in 2008 or 2009, only two or one year of data was used, respectively.
2. Relative importance calculations for both residents and non-residents are based on the entire regional population of the category A species, regardless of whether or not only a portion of the regional population is actually designated as category A. So, for example,

in regions where only certain mountain goat populations have been designated as category A, and in the rest of the region they are not managed under the Harvest Allocation policy, the entire regional hunting effort for mountain goat has been incorporated into the calculation of relative importance. On the other hand, utilization calculations focus on the utilization of designated category A populations only. The reasons for this difference are:

- a. In a number of cases, it would be very difficult and time consuming to determine when a guide outfitter was guiding for a category A animal, and when they were not, should their territories overlap both category A and non-category A populations of a particular species.
 - b. If the relative importance calculation were based on category A populations only, it is expected that regions with small category A populations would have relatively lower importance scores based simply on the size of their category A populations, regardless of the importance of that species in the rest of the region.
3. Due to unique circumstances within various regions, and the manner in which harvest and effort data is collected in the province, a number of assumptions had to be made when applying the data to the harvest allocation calculator. Those data assumptions will not be apparent when reviewing the attached calculator. However, the attached document entitled "Rerunning the Harvest Allocation Calculator – Description of Process" outlines many of those assumptions.

It is important to strongly emphasize that the allocation shares calculated through this exercise are not final, and do not represent the shares that will be applied for the 2012-2016 allocation period. The final allocation shares that will be implemented in the next (2012-2016) allocation period will not be determined until 2012, when the allocation calculator will be formally run based on the complete 2007-2011 harvest information, as stipulated in the Harvest Allocation Policy.

If you have any comments, questions or concerns about the calculator, and the data used to develop the preliminary assessment of how allocation shares may change during the next allocation period, please do not hesitate to contact me by email at Gerad.Hales@gov.bc.ca, or by phone at 250-356-3089.



Gerad Hales
Wildlife Policy Unit Head

	Region	Species	Starting Point		Relative Importance (Demand)		Allocation after relative importance adjustment		Relative Utilization (Success)		Allocation after relative utilization adjustment		Minimum Shares			Allocation after minimum share adjustment		Final Allocation Rounded	
			Resident Allocation	Commercial Allocation	Resident Importance Rating	Commercial Importance Rating	Resident	Commercial	Resident Utilization Rating	Commercial Utilization Rating	Resident	Commercial	Hunt Type Priority	Resident Minimum	Commercial Minimum	Resident	Commercial	Resident	Commercial
1	1	GR BEAR	75	25	1	4	69	31	6	6	71	29	Neutral	60	10	71	29	71	29
2	1	ELK (bull)	75	25	10	4	67	13	9	9	87	13	Neutral	70	10	87	13	87	13
3	1	ELK (archery)	75	25	4	1	81	14	9	7	55	10	Neutral	70	10	85	10	85	15
4	2	ELK (bull)	75	25	6	2	83	17	6	7	85	15	Neutral	70	10	85	15	85	15
5	3	GR BEAR	75	25	1	1	75	25	4	4	75	25	Neutral	60	10	75	25	75	25
6	3	MOOSE (bull)	75	25	10	3	38	11	9	6	47	3	Neutral	70	10	90	10	90	10
7	3	GOAT	75	25	3	3	75	25	3	7	87	33	Commercial	60	20	67	33	67	33
8	3	BH SHEEP (full cut)	75	25	7	6	77	23	9	10	70	25	Commercial	60	20	75	20	75	25
9	4	GR BEAR	75	25	7	4	81	19	10	9	83	17	Neutral	60	10	83	17	83	17
10	4	MOOSE (bull)	75	25	9	6	81	19	9	6	87	13	Neutral	70	10	87	13	87	13
11	4	GOAT	75	25	6	7	73	27	6	7	71	28	Commercial	60	20	71	28	71	28
12	4	BH SHEEP (full cut)	75	25	7	8	73	27	7	10	67	33	Commercial	60	20	67	33	67	33
13	5	GR BEAR	75	25	3	2	77	23	6	6	81	16	Neutral	60	10	81	16	81	15
14	5	CARBON (bull)	70	25	1	2	73	27	6	7	77	23	Neutral	70	10	77	23	77	23
15	5	MOOSE (bull)	75	25	10	9	77	23	9	6	83	17	Neutral	70	10	83	17	83	17
16	5	GOAT	75	25	1	3	71	28	6	7	69	31	Commercial	60	20	69	31	69	31
17	6North	CARBON (bull)	70	25	4	8	67	33	4	6	69	30	Neutral	70	10	70	30	70	30
18	6North	GOAT	75	25	2	8	63	37	3	8	59	41	Commercial	60	20	60	40	60	40
19	6North	TH SHEEP	75	25	9	10	65	35	4	7	69	41	Commercial	60	20	69	40	69	40
20	6North	GR BEAR	75	25	2	7	66	34	5	6	65	35	Neutral	60	10	66	35	65	35
21	6South	MOOSE (bull)	75	25	9	10	73	27	9	10	71	28	Neutral	70	10	71	28	71	28
22	6South	GOAT	75	25	4	6	71	29	6	8	71	29	Commercial	60	20	71	29	71	29
23	6South	GR BEAR	75	25	4	5	73	27	6	4	75	25	Neutral	60	10	75	25	75	25
24	7A	GR BEAR	70	25	5	9	67	33	9	10	60	30	Neutral	60	10	65	35	65	35
25	7A	MOOSE (bull)	75	25	10	10	75	25	9	7	79	21	Neutral	70	10	79	21	79	21
26	7A	MOOSE (cow)	70	25	8	4	43	17	6	10	73	27	Resident	98	2	98	2	98	2
27	7B	GR BEAR	75	25	6	7	70	27	6	6	77	20	Neutral	60	10	77	20	77	23
28	7B	TH SHEEP	75	25	9	10	65	35	10	10	66	35	Commercial	60	20	65	35	65	35
29	7B	ELK (antlerless)	75	25	8	1	59	11	6	2	103	3	Resident	98	2	98	2	98	2
30	7B	BIGON	75	25	6	5	81	19	8	10	77	23	Neutral	70	10	77	23	77	23
31	7B	GOAT	75	25	3	9	63	37	9	7	67	33	Commercial	60	20	67	33	67	33
32	8	MOOSE (bull)	75	25	9	4	85	15	6	6	85	11	Neutral	70	10	85	11	85	11
33	8	GOAT	70	25	2	1	77	23	4	10	89	55	Commercial	60	20	65	35	65	35
34	8	BH SHEEP	75	25	7	7	75	25	6	10	73	27	Commercial	60	20	73	27	73	27

	Region	Species	Average # LEH applicants per year	Average # LEH authorizations per year	Average # successful LEH applicants who purchase licence	Proportion of successful LEH applicants who hunted (assumed if they purchase licence)	Potential # LEH Hunters (Proportion of successful LEH applicants who hunted * # LEH applicants)	# GOS Hunters	# potential hunters (potential # LEH hunters + GOS Hunters)	Rank (NOTE: THIS NUMBER IS AUTOMATICALLY CALCULATED BASED ON INFO IN COLUMNS D TO J)
1	1	Grizzly	299.00	54.00	18.67	0.35	103.38	0.00	103.38	1
2	1	Bull Elk	10245.00	144.00	132.67	0.92	9438.68	0.00	9438.68	10
3	1	elk archery	644.33	28.00	22.00	0.79	506.26	0.00	506.26	4
4	2	Bull Elk	1254.00	34.00	29.00	0.65	1069.59	0.00	1069.59	6
5	3	Grizzly	157.67	12.33	9.33	0.76	119.32	0.00	119.32	1
6	3	Moose (Bull)	7490.67	1296.67	1025.00	0.79	5921.29	3455.67	9376.95	10
7	3	Goat	940.33	185.67	89.33	0.48	452.44	0.00	452.44	3
8	3	Sheep (3/4 curl and full curl)	1760.00	27.00	20.67	0.77	1347.16	138.00	1483.16	7
9	4	Grizzly	1671.33	321.33	229.67	0.71	1337.50	0.00	1337.50	7
10	4	Moose (Bull)	7596.67	784.00	637.67	0.81	6178.75	482.33	6661.08	9
11	4	Goat	2732.67	1950.00	846.00	0.43	1185.56	0.00	1185.56	6
12	4	Sheep (full curl)	1723.67	12.33	10.67	0.66	1490.74	309.33	1800.07	7
13	5	Grizzly	692.67	115.00	67.67	0.59	407.57	0.00	407.57	3
14	6	Caribou (5-12 ONLY)	0.00	0.00	0.00	0.00	0.00	50.67	50.67	1
15	5	Moose (Bull)	13738.00	4080.00	2942.00	0.72	9904.73	0.00	9904.73	10
16	5	Goat	295.50	80.50	31.50	0.39	115.63	1.00	116.63	1
17	6 North	Caribou	653.50	39.00	16.00	0.41	268.10	311.50	579.60	4
18	6 North	Goat	189.50	99.00	40.00	0.40	76.57	112.50	189.07	2
19	6 North	Sheep	797.50	255.50	141.00	0.55	440.11	152.00	592.11	5
20	6 North	Grizzly	723.00	612.00	276.67	0.45	328.85	0.00	328.85	2
21	6 South	Moose (Bull)	4958.67	1385.00	1016.33	0.74	3688.94	2289.00	5975.94	9
22	6 South	Goat	1235.00	768.50	340.00	0.44	548.39	0.00	548.39	4
23	6 South	Grizzly	973.33	334.67	173.33	0.62	504.12	0.00	504.12	4
24	7A	Grizzly	2076.00	851.33	379.67	0.45	925.38	0.00	925.38	5
25	7A	Moose (Bull)	13570.67	4069.00	3040.33	0.75	10139.92	8877.00	19016.92	10
26	7A	Moose (Cow)	4708.00	1997.00	1468.67	0.73	3457.72	0.00	3457.72	8
27	7B	Grizzly	1984.67	575.67	323.67	0.56	1115.87	0.00	1115.87	6
28	7B	Sheep	0.00	0.00	0.00	0.00	0.00	650.33	650.33	5
29	7B	Elk (Cow)	5001.33	1456.67	870.33	0.60	2988.21	0.00	2988.21	8
30	7B	Bison	7907.67	342.00	248.83	0.72	5707.24	0.00	5707.24	8
31	7B	Goat	540.67	61.33	39.00	0.48	259.25	118.33	377.59	3
32	8	Moose	4105.00	269.67	229.33	0.85	3491.03	2329.33	5820.36	9
33	8	Goat	191.33	1.00	1.00	1.00	191.33	0.00	191.33	2
34	8	Sheep (any ram/ 3/4 curl)	2025.00	72.33	56.33	0.78	1577.07	0.00	1577.07	7
		TOTAL							94555.67	
		minimum							50.67	

	Region	Species	Rank (NOTE: if you change 1, it changes others!)
1	1	Grizzly	4
2	1	Bull Elk	4
3	1	Archery Elk	1
4	2	Bull Elk	2
5	3	Grizzly	1
6	3	Moose (Bull)	3
7	3	Goat	3
8	3	Sheep (3/4 curl and full	6
9	4	Grizzly	4
10	4	Moose (Bull)	6
11	4	Goat	7
12	4	Sheep (full curl)	8
13	5	Grizzly	2
14	5	Caribou	2
15	5	Moose (Bull)	9
16	5	Goat	3
17	6 North	Caribou	8
18	6 North	Goat	8
19	6 North	Sheep	10
20	6 North	Grizzly	7
21	6 South	Moose (Bull)	10
22	6 South	Goat	6
23	6 South	Grizzly	5
24	7A	Grizzly	9
25	7A	Moose (Bull)	10
26	7A	Moose (Cow)	4
27	7B	Grizzly	7
28	7B	Sheep	10
29	7B	Elk (Cow)	1
30	7B	Bison	5
31	7B	Goat	9
32	8	Moose	4
33	8	Goat	1
34	8	Sheep	7
		TOTAL	

minimum

					Resident Rank (NOTE: YOU MUST CHANGE THIS COLUMN MANUALLY)				Commercial Rank (NOTE: You MUST CHANGE THIS COLUMN MANUALLY)	
Region	Species	Average # per year harvested by residents	Average # allocated to residents	Utilization by Residents		Average # per year harvested by commercial	Average # allocated to commercial	Utilization by Commercial		
1	1	GRIZZLY	4.00	7.90	51.00	6	3.00	6.20	48.00	5
2	1	ELK (bull)	90.80	104.00	87.00	9	12.00	13.80	87.00	9
3	1	ELK (ARCHERY)	5.43	6.10	89.00	9	1.33	2.17	62.00	7
4	2	Roosevelt ELK (bull)	16.50	22.00	75.00	8	3.00	4.50	67.00	7
5	3	GRIZZLY	2.00	6.50	31.00	4	0.33	0.90	37.00	4
6	3	MOOSE (bull)	248.66	306.67	81.00	9	10.00	23.00	43.00	5
7	3	GOAT	10.33	38.00	27.00	3	11.00	16.67	66.00	7
8	3	SHEEP (3/4 curl)	9.66	12.00	81.00	9	3.33	3.00	111.00	10
9	4	GRIZZLY	56.33	56.66	99.00	10	14.66	18.00	81.00	9
10	4	MOOSE(BULL)	210.56	239.53	88.00	9	36.66	69.36	53.00	6
11	4	GOAT	134.00	226.33	59.00	6	69.66	104.66	67.00	7
12	4	BH SHEEP (full curl)	25.66	37.90	68.00	7	16.00	15.10	106.00	10
13	5	GRIZZLY	16.33	21.80	75.00	8	2.66	4.60	58.00	6
14	5	CARIBOU (5 POINT BULL)	24.00	28.00	86.00	9	7.50	12.00	63.00	7
15	5	MOOSE (bull)	917.50	1045.00	88.00	9	155.00	298.00	52.00	6
16	5	GOAT	10.00	19.50	51.00	6	8.00	11.50	70.00	7
17	6N	CARIBOU (bull)	2.00	5.00	40.00	4	1.50	3.00	50.00	5
18	6N	GOAT	6.00	23.88	25.00	3	14.00	31.00	45.00	5
19	6N	TH SHEEP	12.00	34.90	34.00	4	13.50	22.10	61.00	7
20	6N	GRIZZLY	42.66	93.00	46.00	5	26.00	62.00	42.00	5
21	6S	MOOSE	543.33	650.00	84.00	9	165.66	150.00	110.00	10
22	6S	GOAT	45.00	106.67	42.00	5	17.00	41.50	41.00	5
23	6S	GRIZZLY	22.66	50.00	45.00	5	11.00	33.00	33.00	4
24	7A	GRIZZLY	40.00	49.00	82.00	9	30.00	33.00	91.00	10
25	7A	MOOSE (bull)	1578.33	1758.00	90.00	9	240.66	386.00	62.00	7
26	7A	MOOSE (cow)	561.66	1149.00	49.00	5	33.66	23.00	146.00	10
27	7B	GRIZZLY	37.66	51.66	73.00	8	21.33	39.00	55.00	6
28	7B	TH SHEEP	111.00	109.00	102.00	10	84.00	72.00	117.00	10
29	7B	ELK (antlerless)	287.33	322.66	89.00	9	2.33	18.66	12.00	2
30	7B	BISON	152.13	198.00	77.00	8	39.00	37.33	104.00	10
31	7B	GOAT	9.33	11.11	84.00	9	3.00	4.76	63.00	7
32	8	MOOSE (bull)	60.86	84.00	72.00	8	10.33	17.17	60.00	6
33	8	GOAT	0.33	1.00	33.00	4	0.33	0.33	100.00	10
34	8	SHEEP	14.66	17.30	85.00	9	8.00	7.55	106.00	10

EXERCISE ON RECALCULATING THE HARVEST ALLOCATION SHARES BASED ON PRELIMINARY DATA FROM THE 2007 THROUGH 2009 HUNTING SEASONS

DESCRIPTION OF PROCESS Nov. 12, 2010

The Fish, Wildlife and Habitat Management Branch (FWHMB) of the Ministry of Natural Resource Operations committed to recalculating the harvest shares for hunts administered under the Harvest Allocation policy and procedure, using data from the 2007, 2008 and 2009 hunting seasons. These seasons represent the first three years of harvest during the 2007-2011 allocation implementation/transition period. This document outlines the steps taken to achieve the recalculated harvest shares.

It is important to strongly emphasize that the allocation shares calculated through this exercise are not final, and do not represent the shares that will be applied for the 2012-2016 allocation period. The final allocation shares that will be implemented in the next (2012-2016) allocation period will not be determined until 2012, when the allocation calculator will be formally run based on the complete 2007-2011 harvest information, as stipulated in the Harvest Allocation Policy.

RELATIVE IMPORTANCE

In many instances, only certain sub-regional populations of a particular species are designated as category A. This happens quite often for species such as mountain goat. So, for example, only in part of a region have goat been designated as category A, whereas in the rest of the region they are not managed under the Harvest Allocation policy or procedure. Relative importance calculations for both residents and non-residents are generally based on the entire regional population of category A species, regardless of whether or not only a portion of the regional population is considered to be category A. This is different than the utilization calculations, which focuses on the utilization of designated category A populations only.

The reasons for this difference are:

- A. In a number of cases, it would be very difficult and time consuming to determine when a guide outfitter was guiding for a category A animal, and when they were not, should their territories overlap both category A and non-category A populations.
- B. If the relative importance calculation were based on category A populations only, it is expected that regions with small category A populations would have relatively lower importance scores based simply on the size of their category A populations, regardless of the importance of that species in the rest of the region. So, for example, if one region considers its entire regional population of goats to be category A, whereas an adjacent region only considers a small portion of its regional population to be category A, the second region could have an artificially lower importance score.

Resident Relative Importance

The relative importance scores for resident hunters is determined by estimating the number of hunters that would go hunting for a particular category A species if their opportunities were not constrained by Limited Entry Hunting (LEH). To determine this, three key pieces of information are required:

1. The annual number of applicants who applied for LEH hunts for category A species.
2. The annual number of authorizations issued for those LEH hunts.
3. The annual number of successful LEH applicants who bought licences for the species for which they were drawn.

To obtain data for these items, a list of LEH hunt codes for each category A species, by year, was determined (Appendix I). Using this information, a program was written that could extract the data from the LEH/licensing databases, the results of which were translated into EXCEL format. Because hunt codes can change, future runs of the Allocation Calculator will require a determination of which LEH hunt codes apply. The ACCESS database program that has been developed, however, will be able to quickly determine the three inputs noted above.

The “number of applicants who applied for LEH hunts” was based on the number of first choice applicants only, whereas the “number of authorizations issued” and the “number of successful applicants who bought licenses for the species for which they were drawn” used the total number of authorization issued and licenses bought, regardless of whether or not the applicant applied for the hunt as a first choice or second choice. This appears to have been consistent with what was done in 2007.

When determining which hunt codes to include in each allocated hunt, a number of decisions had to be made, as it was not always clear if certain LEH hunts were part of the harvest regime for a particular category A species. For example, in Region 4 bull moose are considered category A, yet there are “cow/calf or spike bull” moose LEH hunts. A decision had to be made on whether or not those hunt codes should be included in the determination of the three data pieces described above. Appendix I outlines which hunt codes were included. A final determination of the hunt codes will follow after consultation with regions.

As these relative importance calculations included all hunts for the category A species in question, in a number of cases the number of GOS hunters had to be estimated, and added to the total potential number of hunters calculation based on the three data items noted above. The FWHMB currently does not have a method to estimate the participation in general open seasons. The Hunter Sample Survey reports and the Big Game Harvest Statistics (BGHS) provide estimates of the number of LEH and GOS hunters combined, but do not split them out by the two hunt types. So, to estimate the number of GOS hunters, the number of successful LEH applicants who bought licences for the species was subtracted from the total number of hunters for that species, provided in the BGHS, or if the BGHS was not available, from the Hunter Sample Survey report. In some cases the total number of hunters in the BGHS included hunters who were also hunting non-category A classes of a species. For example, in Region 7A, bull moose (including spike-fork) are considered to be category A, but the numbers in the BGHS also include hunters for the calf GOS seasons as they occur concurrently and in the same MUs as the

GOS spike-fork seasons. As there is no accurate way to separate effort for the two types of hunt, both hunts were included in the relative importance calculation.

In some instances, the numbers of hunters recorded in the BGHS is less than those who purchased licences for LEH hunts. This anomaly occurred in 2007 as well, and in these cases, the number of GOS hunters was set to zero.

Antlerless elk hunts in region 7B are harvested through both GOS and LEH. It was not possible to determine the number of GOS antlerless elk hunters in the calculation of importance for this species, as the antlerless GOS hunts occur concurrently and in the same MUs as bull elk GOS hunts.

Spike-fork bull moose were included in the resident relative importance calculations for regions 3, 4, 7A and 8.

Guided Hunter Relative Importance

The relative importance scores for guided hunters are determined using two key pieces of information:

1. The annual number of guided hunters who went hunting for the category A species.
2. The average hunt price a guided hunter pays to go hunting the category A species.

Data for item #1 was obtained from the number of non-resident hunters recorded in the Guide Declaration Form database. This data is unable to discern between the different classes of animals hunted in situations when such hunts overlap spatially or temporally. This is because guided hunters do not need to report the class of animal they were hunting. So, for example, in Region 3, only $\frac{3}{4}$ curl sheep are considered to be category A. These animals are harvested through LEH, but there is a full curl sheep season managed through GOS that occurs at the same time and in the same MUs. As the guide declaration forms do not record the class of animal hunted, it is impossible to separate the number of hunters hunting for these two hunts. In this case, it was assumed that all guided hunters were hunting for $\frac{3}{4}$ curl sheep.

For the reason noted above, it is also impossible to determine the number of guided hunters that hunted for cow moose (Region 7A) or antlerless elk (Region 7B). For the 2010 calculator rerun, I assumed a 100% harvest success rate, and used the numbers of cow moose harvested in region 7A and the number of cow elk and juvenile elk harvested in Region 7B as the metric for the number of hunters for these two hunts.

Guide declaration forms also only report the MU in which the hunt occurred, and not the zone. The “bull elk” and the “archery elk” hunts in Region 1 are considered to be two separate category A hunts, and in one case, occur in separate zones within the same MU. As such, the number of guided hunters for these two hunts cannot be separated from the data provided on the guide declaration forms. Region 1 staff, however, have recorded the zone of hunt on all guide declaration forms, and have provided this data for the 2010 recalculation.

The ‘average hunt price a guided hunter pays to hunt a specific category A species’ were provided by the GOABC. The numbers provided represent the 2009 average hunt prices for

guided hunts. It should be noted that for Region 1, the GOABC provided only one bull elk hunt price even though there are “bull elk” and “archery elk” hunts. A subsequent discussion with the GOABC revealed that the Region 1 bull elk price they provided applies to both type of elk hunts in that region.

UTILIZATION

Utilization scores for both residents and guided hunters are determined by dividing the average annual number of category A animals harvested by each residency group by the average annual number of those animals allocated to each residency group. As stated previously, these calculations try to focus exclusively on category A populations only, and exclude non-category A populations of the same species within a region.

Stakeholder groups have raised a number of concerns over the consistency in how the Harvest Allocation policy and procedure have been implemented during the current allocation period. It should be noted, however, that these inconsistencies do not affect utilization scores, as the scores are based on what was allocated to, and harvested by, each residency group.

Resident Utilization

The annual number of category A animals allocated to resident hunters, for each category A hunt was provided by regional staff in all cases.

To determine the annual number of category A animals harvested, a number of data systems were used. For species that were considered to be category A across the entire region and were compulsory inspected (e.g. grizzly bear), data from the Compulsory Inspection (CI) database was used. For those animals that were considered to be category A across the entire region and were harvested exclusively through LEH, but were not compulsory inspected, the LEH Survey results were used. For animals harvested through GOS and LEH, and were not compulsory inspected, the BGHS or the Hunter Sample Survey results were used. And finally, in cases where only classes of a species, or sub-populations within a region are considered to be category A, regional staff provided the annual number of animals harvested (see Appendix II).

When the allocation calculator was run in November 2010, 2009 data for the BGHS was not yet available, and so data from the Hunter Sample Survey was used. This data does not include estimated kills by sex. So, for the bull and cow moose hunts in Region 7A, an alternate method was used to determine levels of harvest for both sexes. In both cases, I took the estimated total number of moose killed in the Hunter Sample and multiplied it by the percent of males and females reported harvested in the Hunter Sample to get the number harvested for each sex.

Guided Hunter Utilization

The annual number of category A animals allocated to guided hunters, for each category A hunt was provided by regional staff in all cases.

To determine the annual number of category A animals harvested, the Guide Declaration form database was used in most cases. This appears to be consistent with what was done in 2007. Compulsory inspection data was used in cases where the species were considered to be category A across the entire region and were compulsory inspected (e.g. grizzly bear).

There are some minor discrepancies between the Guide Declaration database and the CI database. I will be working with FWHMB staff to sort out these differences over the coming months. As with resident utilization, in cases where only classes of a species, or sub-populations within a region are considered to be category A, regional staff provided the annual number of animals harvested (Appendix II).

The Guide Declaration database includes all hunters that were guided, regardless of their residency status. So, it includes residents, non-resident Canadians and non-residents from outside of Canada. A result of this is that the harvest data includes harvest by guided residents and guided residents who held a LEH authorization for the species in question. The current Quota procedure states that "the harvest by any guided resident hunter with a LEH authorization should not be included in the quota." Thus, the harvest by a guided resident hunter with a LEH authorization should not be included in the utilization calculation. While it is possible to determine which of a particular guide's resident clients harvested an animal under the auspices of a LEH authorization, the procedure is currently time consuming, and was not included in the 2010 recalculation when determining utilization scores for guided hunters, the 2012 recalculation should make this distinction.

This is also true for the CI data used. Guides' utilization scores that were based on CI data included harvest by both guided non-residents and residents. This means guided residents are double-counted, as they are included in both resident and guided harvest. Guided residents make up only a small percentage of the number of guided hunts, so it is believed this overlap is small. The result of this, however, is that data used to run the allocation calculator may differ somewhat from the data used/collected by regional staff. Further review of this issue is warranted, and a resolution reached prior to the next allocation period.

Again, it is important to strongly emphasize that the allocation shares calculated through this exercise are not final, and do not represent the shares that will be applied for the 2012-2016 allocation period. The final allocation shares that will be implemented in the next (2012-2016) allocation period will not be determined until 2012, when the allocation calculator will be formally run based on the complete 2007-2011 harvest information, as stipulated in the Harvest Allocation Policy.

APPENDIX I. List of Hunt Codes for Category A species

	Region	Species	2007/08 Hunt Codes	2008/09 Hunt Codes	2009/2010 Hunt Codes	
1	1	Grizzly	Spring 2007 = 3092-3095; Fall 2007 = 3001-3004	Spring 2008 = 3093-3096; Fall 2008 = 3001-3004	Spring 2009 = 3094-3097; Fall 2009 = 3001-3004	
2	1	Bull Elk	2030-2058	2030-2058	2033-2061	
3	1	Elk Archery	2001-2009	2001-2009	2001-2012	
4	2	Bull Elk	2059-2071	2059-2072	2062-2078	
5	3	Grizzly	Spring 2007 = 3096-3099	Spring 2008 = 3097-3100	Spring 2009 = 3098-3101	No fall hunts.
6	3	Moose (Bull)	4025-4086	4025-4086	4026-4086	Excluded cow/calf hunts
7	3	Goat	5002-5027	5002-5026	5002-5025	
8	3	Sheep (3/4 curl and full curl)	6004-6011	6004-6011	6004-6012	Did not include the "ram" or "any male" hunts. Were not included in 2007 calculation.
9	4	Grizzly	Spring 2007 = 3100-3129	Spring 2008 = 3101-3128	Spring 2009 = 3102-3131	No fall hunts.
10	4	Moose (Bull)	4093-4131	4093-4136	4093-4136	Excluded cow/calf or spike bull hunts
11	4	Goat	5028-5101	5027-5100	5026-5100	
12	4	Sheep (full curl)	6017-6021	6017-6021	6018-6025	
13	5	Grizzly	Spring 2007 = 3130-3137; Fall 2007 = 3005-3008	Spring 2008 = 3129-3136; Fall 2008 = 3005-3009	Spring 2009 = 3132-3140; Fall 2009 = 3005-3008	
14	5	Caribou (5-12)	N/A	N/A	N/A	
15	5	Moose (Bull)	4136-4223	4141-4228	4141-4228	Excluded cow or calf seasons
16	5	Goat	5102-5111	5101-5110	5101-5110	
17	6 North	Caribou	1001-1003	1001-1003	1001-1003	Includes bull only and 5 pt bull seasons.
18	6 North	Goat	5151-5158	5149-5156	5148-5155	
19	6 North	Sheep	6000, 6022-6029	6000, 6022-6028	6000, 6026-6032	Included Spatsizi early draw
20	6 North	Grizzly	Spring 2007 = 3155-3171; Fall 2007 = 3026-3042	Spring 2008 = 3154-3170; Fall 2008 = 3027-3043	Spring 2009 = 3158-3174; Fall 2009 = 3025-3041	
21	6 South	Moose (Bull)	4224-4247, 4249	4229-4252, 4254	4229-4252, 4254	
22	6 South	Goat	5112-5150, 5159	5111-5148, 5157	5111-5147, 5156	
23	6 South	Grizzly	Spring 2007 = 3138-3154, 3172; Fall 2007 = 3009-3025, 3043	Spring 2008 = 3137-3153, 3171; Fall 2008 = 3010-3026, 3044	Spring 2009 = 3141-3157, 3175; Fall 2009 = 3009-3024, 3042	
24	7A	Grizzly	Spring 2007 = 3173-3200; Fall 2007 = 3044-3072	Spring 2008 = 3172-3200; Fall 2008 = 3045-3073	Spring 2009 = 3176-3204; Fall 2009 = 3043-3071	
25	7A	Moose (Bull)	4292-4328	4306-4350	4306-4350	
26	7A	Moose (Cow)	4250-4291	4255-4305	4255-4305	Includes antlerless and cow or calf seasons.
27	7B	Grizzly	Spring 2007 = 3201-3220; Fall 2007 = 3073-3092	Spring 2008 = 3201-3220; Fall 2008 = 3074-3093	Spring 2009 = 3205-3224; Fall 2009 = 3072-3091	
28	7B	Sheep	N/A	N/A	N/A	
29	7B	Elk (Cow)	2110-2111	2142	2154-2155	Excluded "either sex" hunts. There were no "either sex" LEH hunts in 2000-2004.
30	7B	Bison	0001-0008	0001-0008	0001-0008	
31	7B	Goat	5182-5198	5180-5196	5179-5195	
32	8	Moose (bull)	4332-4361	4354-4383	4354-4383	
33	8	Goat	5199	5197	5196	
34	8	Sheep (any ram/3/4 curl)	6030-6042	6029-6041	6033-6045	Includes 3/4 curl and ram only hunts.

APPENDIX II. Data sources used for determining resident harvest utilization scores.

Region	Hunt	Resident Harvest Data Source	Non-Resident Harvest Data Source
1	Grizzly	CI Database	CI Database
1	Bull Elk	Regional Staff	Regional Staff
1	Elk Archery	Regional Staff	Regional Staff
2	Bull Elk	Regional Staff	Regional Staff
3	Grizzly	CI Database	CI Database
3	Moose (Bull)	LEH Survey Estimates	Guide Declaration
3	Goat	CI Database	CI Database
3	Sheep (3/4 curl)	Regional Staff	Regional Staff
4	Grizzly	CI Database	CI Database
4	Moose (Bull)	LEH Survey Estimates	Guide Declaration
4	Goat	Regional Staff	Regional Staff
4	Sheep (full curl)	CI Database	CI Database
5	Grizzly	CI Database	CI Database
5	Caribou	CI Database	Guide Declaration
5	Moose (Bull)	LEH Survey Estimates	Guide Declaration
5	Goat	Regional Staff	Regional Staff
6 North	Caribou	Regional Staff	Regional Staff
6 North	Goat	Regional Staff	Regional Staff
6 North	Sheep	Regional Staff	Regional Staff
6 North	Grizzly	CI Database	CI Database
6 South	Moose (Bull)	BGHS/Hunter Sample	Guide Declaration
6 South	Goat	Regional Staff	Regional Staff
6 South	Grizzly	CI Database	CI Database
7A	Grizzly	CI Database	CI Database
7A	Moose (Bull)	BGHS/Hunter Sample	Guide Declaration
7A	Moose (Cow)	BGHS/Hunter Sample	Guide Declaration
7B	Grizzly	CI Database	CI Database
7B	Sheep	Regional Staff	Regional Staff
7B	Elk (Antlerless)	LEH Survey Estimates	Guide Declaration
7B	Bison	LEH Survey Estimates	Guide Declaration
7B	Goat	CI Database	Guide Declaration
8	Moose (Bull)	LEH Survey Estimates	Guide Declaration
8	Goat	CI Database	CI Database
8	Sheep (any ram/ 3/4 curl)	CI Database	CI Database

From: Hales, Gerard S ENV:EX
Sent: Friday, November 12, 2010 3:24 PM
To: 'Wilfred.Pfleiderer@westfraser.com'; 'Scott Ellis (GOABC)'
Cc: Ethier, Tom ENV:EX; Hatter, Ian ENV:EX; Hales, Gerard S ENV:EX
Subject: 133676-Exercise of Recalculating the Harvest Allocation Calculator - 2010

Hello Wilf and Scott. Please find attached:

- 1) A letter describing the exercise to recalculate the harvest allocation shares based on data from the 2007, 2008 and 2009 hunting seasons.
- 2) The Harvest Allocation calculator, which is divided into four parts:
 - a. The calculator itself, which summarizes the relative importance scores, the utilization scores, and recalculated harvest shares;
 - b. The resident relative importance calculations;
 - c. The commercial (i.e. guided) relative importance calculations; and
 - d. The utilization calculations for both residency groups.
- 3) A document outlining the process and some of the assumptions used in recalculating the harvest allocation shares.

Please note that the allocation shares calculated through this exercise are not final, and do not represent the shares that will be applied for the 2012-2016 allocation period. The final allocation shares that will be implemented in the next (2012-2016) allocation period will not be determined until 2012, when the allocation calculator will be formally run based on the complete 2007-2011 harvest information, as stipulated in the Harvest Allocation Policy.

Please call me if you have any questions or concerns.



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Rerunning the
Harvest Allocati...

Gerad Hales, R.P.Bio.
Wildlife Policy Unit Head
Fish and Wildlife Branch
250-356-3089

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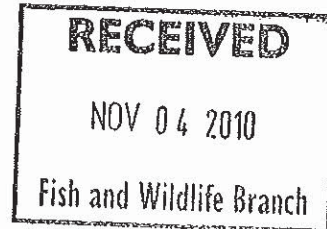


Guide Outfitters Association of British Columbia

Suite 103, 18140 - 28th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: Info@goabc.org

October 22, 2010

Tom Ethier
Director, Fish, Wildlife and Habitat Management Branch
PO Box 9391 Stn Prov Gov't
Victoria, BC
V8W9M8



RE: Harvest Allocation Procedure

Dear Tom:

We have reviewed the Harvest Allocation Procedure and are very concerned about determining the degree of utilization for resident hunters. Could you please explain how the Ministry of Environment will calculate "the average annual number of those animals harvested by resident hunters"?

Sincerely,

Scott Ellis
General Manager
Guide Outfitters Association of British Columbia

Wildlife Stewardship is our Priority™



Reference: 130540

SEP 24 2010

Scott Ellis, Mark Werner, and Dave Beranek
Guide Outfitters Association of British Columbia
Suite 103, 19140 - 28th Avenue
Surrey BC V3S 6M3

Dear Mr. Ellis, Mr. Werner and Mr. Beranek:

The purpose of this letter is to provide you and the GOABC with my responses to a number of key concerns expressed by members of the GOABC at the June 8, 2010 meeting in Cranbrook, and at the June 23, 2010 meeting in Prince George. I would like to thank you once again for allowing my staff and me to attend those meetings. Both meetings provided us with a great deal of insight on how the allocation policy may impact the guiding industry in 2012.

1. The Use of Success Factors in Determining Quota

It is my understanding that the guiding industry wishes to maintain the use of success factors in determining quotas for several reasons, namely it:

- a) allows guides to better achieve their individual portions of the annual allowable harvest (AAH) while lessening the risk of incurring an infraction under the *Wildlife Act*; and
- b) allows high performing guides to compensate for guides within a region who may not be adequately harvesting their portion of allocated wildlife, and thus affords guides a better opportunity to fully utilize their allocated portion of the AAH at the regional level.

As you are aware, "quota" is defined in the *Wildlife Act* as "*The total number of a game species specified by the regional manager that the clients of a guide outfitter may kill in the guide outfitter's guiding area during a licence year.*" When a success factor is used to determine quota, however, it needs to be recognized that the resulting quota is not one that the Ministry wants the guide to harvest in a single year. For example, if the guide's portion of the AAH is 10 animals, and a 50% success factor is applied, the guide's annual quota would be 20 animals. In

this case, it is expected the guide will attempt to harvest 10 animals annually, and not 20. Using a success factor to determine quota can result in an increased risk of guides exceeding their allocated share of the harvest.

Success factors are used in the Limited Entry Hunting (LEH) system to determine how many residents hunters should be issued permits to achieve their allocated share of the harvest. Using success factors in the determination of guide quotas would be analogous to the Ministry prescribing how many clients guides could take out annually, and is an approach that neither the government nor the guiding industry supports. Guides should be provided the latitude to manage their own businesses and determine for themselves how many clients are needed to achieve their allocated harvest opportunities.

For these reasons, the practice of using success factors in the determination of guide quotas will cease when the Harvest Allocation policy is fully implemented in 2012.

The administrative guidelines provide most guide outfitters with the flexibility they need to achieve their annual harvest targets, while mitigating concerns of incurring infractions under the *Wildlife Act*. I do agree however, that guides with small quotas will have more of a challenge to work with the administrative guidelines, and I have addressed that particular concern under issue #3.

As you know, the current administrative guideline level (i.e. the ability for guides to harvest 30% of their 5-year cumulative AAH in a single year) was arrived at after lengthy negotiations between the Ministry and representatives of the GOABC and the BCWF, and it is important to continue applying these administrative guidelines through the current allocation period, and into the 2012-2016 allocation period when the Harvest Allocation policy is fully implemented. If, however, it is determined that after the third year of full implementation (i.e. 2015) guides have not harvested 60% of their portion of the cumulative 5-year allowable harvest, I am prepared to consider amendments to the Administrative Guideline procedure that would better enable guides to achieve their AAH.

2. Spatial Application of Allocation Decisions

The guiding industry has asked for clarification as to the scale at which allocation decisions will be applied. Guide territories do not cover all areas within some regions, and to be more specific, do not cover all areas where current category A species/populations occur. During the 2007-2011 implementation period, regional managers have, in some instances, increased the guides' share of the AAH within guide territories above what was calculated through the 2007 Harvest Allocation process in order to offset the loss of guide harvest opportunities in these areas without guide territories, and to meet regional allocation shares.

The "Harvest Allocation: An Implementation Plan for 2007-2011" document states that *"this practice will cease at the end of the first allocation period (by 2012), once a thorough review of*

this issue can be conducted." This review will examine the differences in the cumulative number of animals that are available for harvest by guides when the allocation shares are applied to the AAH within guide outfitter territories versus the regional AAH, as well as compare these amounts with recent guide outfitter harvest levels. The review has been initiated and is expected to be completed by the end of winter, 2010/11.

When the Harvest Allocation policy is fully implemented in 2012, I will be instructing staff to apply the allocation shares at the guide outfitter territory level. I believe this decision is consistent with the implementation plan document referenced above, as well as the Quota Procedure, which states "*Quotas should be calculated to reflect guided hunters' share of the harvestable portion of the population within each guide outfitter's territory, if available.*"

3. Guides with Small Quotas

At both the Cranbrook and Prince George meetings, I heard questions concerning guides with small quotas (i.e. quotas of one animal per year or less), specifically that current administrative guideline levels do little to help these guides, as at any point during an allocation period they are faced with the issue of potentially exceeding their quota if they need to bring in more than one client to harvest an animal. A similar situation could also occur when a guide outfitter nears fulfilling his/her 5-year cumulative AAH within an allocation period.

The intent of the policy has always been that guides with small quotas will manage their hunts within the same framework that applies to all guide outfitters. Many guides with small quotas have been able to successfully do this. However, if a guide with a small quota is concerned about exceeding their quota or cumulative 5-year AAH, due to the need to bring in more than one client to harvest one animal, that guide should contact the Regional Manager to discuss potential solutions.

4. Exceeding the 5-Year Cumulative AAH and Transferring Quotas

The issue of successful guides having the opportunity to exceed their cumulative 5-year AAHs was brought up at the Prince George meeting, and is linked to the matter of transferring quotas between guides, in particular transferring the unused quota of an under-performing guide to one that is fully utilizing their quota.

With respect to successful guides exceeding their cumulative 5-year AAHs, such actions will not be endorsed by the Ministry. As is current practice, guides should not harvest beyond their annual quotas nor their cumulative 5-years AAHs: doing so would be a contravention of their licence conditions and may result in actions taken under sections 60 and 61 of the *Wildlife Act*. Once a guide outfitter has harvested his/her 5-year cumulative AAH for a particular species, they can no longer hunt for that species within their territory until the following allocation period, unless an amendment to the AAH occurs that results in additional animals being available for harvest.

The Ministry will not be permitting the transfer of quotas between guide outfitters. The rationale for this decision is:

- a. LEH authorizations are non-transferrable, and similar conventions should be applied to quotas;
- b. As quotas are based on the guides' harvestable portion of the category A species within a particular guide territory, they are tied to a particular piece of land with a designated AAH for that species. Transferring quotas and harvest to a different guide outfitting territories could result in excessive hunting pressures and localized overharvest; and
- c. Tracking the transfer of quotas between guide outfitters could become onerous to manage, a task that the Ministry currently does not have the capacity to administer.

Guide outfitters need to be aware of other avenues available to them to access the under-utilized quotas of other guides, namely guides can apply for a permit under section 70(1)(b) of the *Wildlife Act* to guide in another outfitter's territory or can become an assistant guide for the territory with the under-utilized quota.

5. Viability of the Guide Outfitting Industry and an Economic Impact Assessment

The question of guide outfitting industry viability has been raised on several occasions regarding the role of the Ministry in maintaining this viability. The Commercial Hunting Interests policy outlines how the Ministry addresses guide outfitters' commercial interest in the harvest of big game species, and sections 3(a) through 3(d) speak specifically to how the Ministry supports the viability of the guiding industry. The points expressed in this policy require continual monitoring of harvest regulations in order to achieve the policy's intent. This monitoring and refinement will occur as the Harvest Allocation policy is implemented over the coming years. It is important to note, however, that this policy speaks to maintaining industry-level viability and not viability at the level of the individual guide outfitter. Such fine-scale management would be both unreasonable and unachievable.

The GOABC has also asked if the Harvest Allocation calculator will take into consideration economic factors that may influence guides' abilities to book hunts and therefore could affect their measures of importance and utilization. As with other businesses, the guide outfitting industry is subject to external market forces and the economic health of the province, Canada, and the countries from which guided clients originate. Accounting for these variables would represent a level of complexity that would be extremely difficult to incorporate into the Harvest Allocation policy. As such, guide outfitter importance and utilization calculations will not be adjusted to account for changes in the guide outfitting market.

The GOABC has also requested an economic impact assessment with respect to full Harvest Allocation policy implementation. While I think this is a reasonable request, I believe that the GOABC should lead this review as they are in the best position to address the potential economic

impacts of the Harvest Allocation policy on the guide-outfitting industry. The Ministry is willing to provide you with any information (e.g. harvest and effort data) and statistical support you may need to perform the analysis. Please contact Gerad Hales at Gerad.Hales@gov.bc.ca for any such assistance.

The five issues that I have addressed stem, in part, from the concern that if allocated AAHs are not fully utilized by one residency group, the harvest opportunities will be transferred to the opposite residency group. This is a concern shared by both resident hunters and the guiding community. Reducing this concern was the primary impetus behind the proposal put forward by the Ministry to increase the harvest utilization increments from 10% to 20% (or 25%) in the Harvest Allocation procedure (Reference # 125588). Both the GOABC and the BCWF did not support this proposal, and we have respected these positions. I would appreciate your thoughts on other approaches for addressing this concern, while still adhering to the principles in the Wildlife Harvest Policy.

In closing, I would like to express my appreciation to the GOABC for its continued support of the Harvest Allocation policy, including the development of allocation shares and a transparent process on how they are calculated. The implementation of the Harvest Allocation policy will undoubtedly result in changes to the guide outfitting industry in British Columbia, but I remain confident that your industry will remain strong, and will benefit from the increased certainty afforded by the Wildlife Allocation policy. While my intent in this letter has been to give you some clear answers to your questions, I remain committed to reviewing and updating the Harvest Allocation policy as needed and agreed to by both residency groups, after it has been fully implemented in 2012.

Sincerely,



Tom Ethier
Director



Guide Outfitters Association of British Columbia

Suite 103, 19140 - 28th Avenue, Surrey, BC Canada V3S 8M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@goabc.org

October 4, 2010

Tom Ethier
Director, Wildlife and Habitat Management Branch
Ministry of Environment
PO Box 9391 Stn Prov Govt
Victoria, BC
V8W 9M8



RE: Fractional and Vacant Guide Territories

Dear Tom:

Your letter dated September 29, 2010 (reference # 130540) reconfirmed that allocation shares will be applied at the guide outfitter level. This means that guide outfitters will not be permitted to harvest animals in factional and vacant guide territories to achieve their regional annual allowable harvest.

The sale of factional and vacant guide territories was temporarily suspended by the Ministry of Environment during the development of the Allocation Policy. Since the Policy is now being implemented, the reason for deferring the sale of factional and vacant guide territories is no longer valid. The Allocation Policy commits to the timely "review of the status of uncertificated areas" and "disposition of guide territories". The sale of fractional and vacant guide territories could help mitigate the impact of the Allocation Policy for some of our members and result in additional revenue for government.

The Guide Outfitters Association of British Columbia requests the Ministry of Environment restart the sale of fractional and vacant guide territories.

Please call 604-541-6332 if you have questions.

Sincerely,

Scott Ellis
General Manager
Guide Outfitters Association of British Columbia

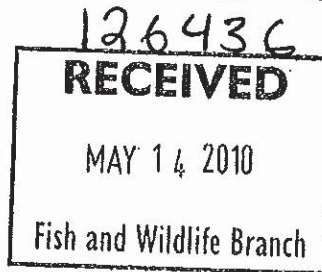
cc. Jody Shimkus, ADM - MoE
Doug Konkin, DM - MoE
Mark Werner, President - GOABC



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Telephone: 604-291-9990 Fax: 604-291-9933
Toll Free: 1-888-881 BCWF (2293)
officeinfo@bcwf.bc.ca www.bcwf.bc.ca

May 10, 2010

Mr. Tom Ethier
Director Fish & Wildlife Branch
Ministry of Environment
PO Box 9391 Stn Prov Govt
Victoria, BC V8W 9M8



Dear Tom,

Re: Increasing Utilization Increments in the Harvest Allocation Procedure

BC Wildlife Federation (BCWF) membership wishes to express their appreciation for the letter received (Reference 125589) regarding the request to increase the harvest utilization increments from 10% to 20% or 25% in the Harvest Allocation Procedure.

BC Wildlife Federation does not support the request at this time. When the Allocation Calculator was first run to generate the regional percentages for the 2007 to 2011 period, it was with inconsistent data from the regions. Now that consistent and appropriate data should be available to accurately run the Allocation Calculator for the very first time, BCWF believes it is important to allow the process to run as intended before beginning to modify the provisions of procedure that were set out and agreed upon. We do not believe it would be beneficial to run the Allocation Calculator as suggested in your letter.

When the Allocation Calculator was developed by the Ministry of Environment (MoE) staff, there were many concerns raised by the stakeholders. MoE representatives assured BC Wildlife Federation that 10% increments for degree of utilization were the most appropriate for generating the regional allocation percentages. We would like the opportunity for that to finally occur before modifications are proposed.

BC Wildlife Federation wishes to point out that there are safeguards to ensure regional percentages are not reduced if the appropriate steps have not been taken to address under utilization by any residency group.

During the course of a regulation cycle, the Regional Manager should review regulations if:

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- (b) non-residents are harvesting <80% of their allocation for a category A species within a region.



Mr. Tom Ethier, Director Fish & Wildlife Branch
Ministry of Environment
May 10, 2010
Continued ...

Page 2.

This provision ensures that regulations will be addressed to ensure the Annual Allowable Harvest (AAH) will be achieved if barriers do exist. This is to ensure the regions address any barriers that do exist! There is no alignment of procedures required.

Under Harvest Policy Manual, Volume 4, Section 7, Subsection 01.03, Page 1: Policy Statement:

- (b) changes of allocation share between resident hunters and guided hunters are gradual, reflect relative importance and utilization, and will only occur after unnecessary barriers to achievement of harvest have been addressed.

The regional allocation percentage cannot be changed if the regions have not removed any barriers that prevent achievement of the AAH. The purpose here was to provide a safeguard to the residency groups.

It is incumbent that regional wildlife staff address the under utilization issues, particularly for hunts with small allocations. BCWF has provided solutions to these issues on numerous occasions and will continue to address these in a positive manner. In many cases, resident harvest achievement is very dependent on the actions of regional staff. The commercial sector has greater freedom to plan achieving their harvest upon receiving their quota provisions.

It is very obvious that the 2007 Provincial Wildlife Allocation Policy is very poorly understood by many individuals. The commercial sector has no representatives who were involved with the development of the policy and procedures. Many fears are not warranted by the very safeguard provisions in the policy and procedures.

BC Wildlife Federation does request that the provisions of the 2007 Provincial Wildlife Allocation Policy and Procedures be adhered to as written. We draw your attention to all the hunts where the unnecessary barriers have not been removed for resident hunters to achieve their allocated harvest and the numerous Limited Entry Hunts that should have been moved to a General Open Season. It is the responsibility of the Wildlife Branch regions to act on these in accordance with policy before any changes in allocation percentage can occur.

This is why on numerous occasions BCWF requested a simple spreadsheet illustrating AAH versus actual harvest for the Category A hunts. To date there has been no fulfillment of this specific request. In addition, we wish to express our appreciation for the hunts in which the barriers have been removed or acted upon.

BCWF membership wishes to express their appreciation for the hunts in which the unnecessary barriers to achieving resident harvest have been removed.



Mr. Tom Ethier, Director Fish & Wildlife Branch
Ministry of Environment
May 10, 2010
Continued ...

Page 3.

BC Wildlife Federation believes it is critical to allow the 2007 Provincial Wildlife Allocation Policy to be implemented before any changes are made. There was a huge expenditure of time, energy, and resources placed in the new product. It needs an opportunity to be acted upon for the benefit of all residency groups. Lack of understanding has been the catalyst for creating so much fear. It may be beneficial that training occur so clarity regarding the policy exists.

Yours in conservation,

A handwritten signature in black ink, which appears to read "Wilf Pfeleiderer", is positioned above the printed name.

Wilf Pfeleiderer
BCWF Wildlife Committee Chair
BC Wildlife Federation

cc: The Honourable Barry Penner, Minister of Environment
Mr. Doug Konkin, Deputy Minister Ministry Environment
Mr. Ralph Archibald, Assistant Deputy Minister Environmental Stewardship
BC Wildlife Federation Membership
BC Wildlife Federation Wildlife Committee



The Best Place on Earth

Reference: 125588

APR 19 2010

Scott Ellis
Guide Outfitters Association of British Columbia
Suite 103, 19140 - 28th Avenue
Surrey BC V3S 6M3

RE: Increasing utilization increments in the Harvest Allocation Procedure

Dear Mr. Ellis:

A number of concerns have been raised by members of the resident hunting and guide outfitting community concerning the ability of each user group to fully utilize their portion of the allocated harvest during the 2007-2011 implementation period, and the potential consequences this may have on the calculation of allocation shares for the 2012-2016 allocation period. In response to these concerns, the Fish and Wildlife Branch is inviting feedback on the following proposal:

- Increasing the harvest utilization increments from 10% to 20% or 25% in the Harvest Allocation Procedure.

As you are aware, determining harvest allocation shares for category A species involves calculating both the relative importance (demand) and relative utilization (success). Relative utilization is determined by calculating the number of successfully harvested animals of a category A species in a particular region as a percentage of the total number of animals of that category A species allocated for harvest in that region. Utilization scores are then placed into categories based on the degree of utilization, using 10% increments:

- 0-10% of the allocated share = Category 1
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The degree of utilization is then compared between each user group, and the allocation shares are altered using 2% increments, according to the matrix in the Harvest Allocation Procedure (page 6).

Under the current practice, if a hunter group under-utilizes their allocated share by as little as 11%, their utilization scores will drop by one category. The proposal would see the increments between utilization categories increased to 20% or 25%, such that the utilization categories would be:

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Allocation shares would still change by 2% increments, based on the difference in utilization scores between the two user groups, as per current practice.

There are a number of merits to increasing the harvest utilization increments from 10% to 20% or 25%, including:

- reducing user-group concerns of not being able to achieve full utilization during the transition period and in subsequent allocation periods. Under the proposed system, user-groups would be able to under-utilize their allocated share by 20% or 25% without being penalized.
- reducing under-utilization issues particularly for hunts with small allocations, where under-harvesting even a few animals could impact utilization scores ;
- bringing the Harvest Allocation procedure in line with the new Big Game Harvest Management Procedure, which states:

During the course of a regulation cycle, Regional Managers should review regulations if:

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- working to reduce the “use it or lose it” mentality that has been expressed by some individual stakeholders.

It is important to emphasize that all aspects of the Harvest Allocation policy and procedure will be fully implemented in 2012, and Fish and Wildlife Branch will continue to review and address situations where there appears to be under-harvest as a result of redundant or unnecessarily restrictive regulations. The proposal outlined in this letter is only to amend the method by which utilization scores are calculated.

Please respond to this letter no later than May 14, 2010. If you have any questions, please do not hesitate to contact Gerad Hales, Wildlife Policy Unit Head, Wildlife Management, by phone (250-356-3089) or email (Gerad.Hales@gov.bc.ca).

Sincerely,



Tom Ethier
Director



Reference: 125588

Scott Ellis
Guide Outfitters Association of British Columbia
Suite 103, 19140 - 28th Avenue
Surrey BC V3S 6M3

RE: Increasing utilization increments in the Harvest Allocation Procedure

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It is important to emphasize that all aspects of the Harvest Allocation policy and procedure will be fully implemented in 2012, and Fish and Wildlife Branch will continue to review and address situations where there appears to be under-harvest as a result of redundant or unnecessarily restrictive regulations. The proposal outlined in this letter is only to amend the method by which utilization scores are calculated.

Please respond to this letter no later than May 14, 2010. If you have any questions, please do not hesitate to contact Gerad Hales, Wildlife Policy Unit Head, Wildlife Management, by phone (250-356-3089) or email (Gerad.Hales@gov.bc.ca).

Sincerely,

Tom Ethier
Director



Guide Outfitters Association of British Columbia

Suite 103, 19140 – 28th Avenue, Surrey, BC Canada V3S 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@goabc.org

May 7, 2010

Tom Ethier
Fish and Wildlife Branch
PO Box 9391 STN PROV GOV'T
Victoria, BC V8W9M8

Dear Tom:

Thank you for your letter regarding the possibility of increasing the utilization increments in the Harvest Allocation Procedure (Reference 125588). We appreciate the opportunity to provide input to policies, procedures and regulations.

The Relative Importance (Demand) matrix in the allocation calculator creates competition between guide outfitters in different regions. The Relative Utilization (Success) matrix creates competition between recreational hunters and guide outfitters. As a result, there will be continued pressure on government to liberalize, harmonize and simplify regulations to increase the harvest. The Policy will continue to put the stakeholders in opposing positions for the fear of losing hunting opportunity. Unfortunately, this puts the wildlife at a higher risk of an overharvest.

The GOABC has accepted the new Allocation Policy in principle. Any change to the Allocation Policy will have positive quota impacts to some members and negative impacts to others. We can only measure overall impact and we believe that this suggested change to utilization will have a negative impact on guide outfitters provincially. Therefore, we do not support this change to the utilization scale. Furthermore, we do not believe this change will reduce stakeholder concerns about achieving full utilization, reduce the pressure on regulations, or reduce the competition between stakeholders.

Sincerely,

Scott Ellis
General Manager

cc Ralph Archibald – MoE
Ian Hatter – MoE
Gerad Hales – MoE
Mark Werner – GOABC
Brian Glaicar – GOABC
Keith Connors – GOABC

Wildlife Stewardship is our Priority™



Reference: 125589

APR 19 2010

Wilf Pfeleiderer
British Columbia Wildlife Federation
Unit 101-3060 Norland Avenue
Burnaby BC V5B 3A6

RE: Increasing utilization increments in the Harvest Allocation Procedure

Dear Mr. Pfeleiderer:

A number of concerns have been raised by members of the resident hunting and guide outfitting community concerning the ability of each user group to fully utilize their portion of the allocated harvest during the 2007-2011 implementation period, and the potential consequences this may have on the calculation of allocation shares for the 2012-2016 allocation period. In response to these concerns, the Fish and Wildlife Branch is inviting feedback on the following proposal:

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Sincerely,



Tom Ethier
Director



Reference: 125589

Wilf Pfeleiderer
British Columbia Wildlife Federation
Unit 101-3060 Norland Avenue
Burnaby BC V5B 3A6

RE: Increasing utilization increments in the Harvest Allocation Procedure

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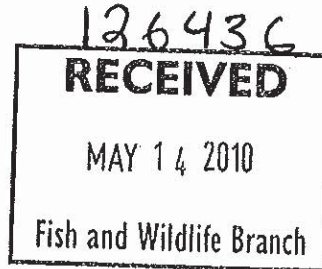
Tom Ethier
Director



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Telephone: 604-291-9990 Fax: 604-291-9933
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May 10, 2010

Mr. Tom Ethier
Director Fish & Wildlife Branch
Ministry of Environment
PO Box 9391 Stn Prov Govt
Victoria, BC V8W 9M8



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Mr. Tom Ethier, Director Fish & Wildlife Branch
Ministry of Environment
May 10, 2010
Continued ...

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This provision ensures that regulations will be addressed to ensure the Annual Allowable Harvest (AAH) will be achieved if barriers do exist. This is to ensure the regions address any barriers that do exist! There is no alignment of procedures required.

Under Harvest Policy Manual, Volume 4, Section 7, Subsection 01.03, Page 1: Policy Statement:

- (b) changes of allocation share between resident hunters and guided hunters are gradual, reflect relative importance and utilization, and will only occur after unnecessary barriers to achievement of harvest have been addressed.

The regional allocation percentage cannot be changed if the regions have not removed any barriers that prevent achievement of the AAH. The purpose here was to provide a safeguard to the residency groups.

It is incumbent that regional wildlife staff address the under utilization issues, particularly for hunts with small allocations. BCWF has provided solutions to these issues on numerous occasions and will continue to address these in a positive manner. In many cases, resident harvest achievement is very dependent on the actions of regional staff. The commercial sector has greater freedom to plan achieving their harvest upon receiving their quota provisions.

It is very obvious that the 2007 Provincial Wildlife Allocation Policy is very poorly understood by many individuals. The commercial sector has no representatives who were involved with the development of the policy and procedures. Many fears are not warranted by the very safeguard provisions in the policy and procedures.

BC Wildlife Federation does request that the provisions of the 2007 Provincial Wildlife Allocation Policy and Procedures be adhered to as written. We draw your attention to all the hunts where the unnecessary barriers have not been removed for resident hunters to achieve their allocated harvest and the numerous Limited Entry Hunts that should have been moved to a General Open Season. It is the responsibility of the Wildlife Branch regions to act on these in accordance with policy before any changes in allocation percentage can occur.

This is why on numerous occasions BCWF requested a simple spreadsheet illustrating AAH versus actual harvest for the Category A hunts. To date there has been no fulfillment of this specific request. In addition, we wish to express our appreciation for the hunts in which the barriers have been removed or acted upon.

BCWF membership wishes to express their appreciation for the hunts in which the unnecessary barriers to achieving resident harvest have been removed.



Mr. Tom Ethier, Director Fish & Wildlife Branch
Ministry of Environment
May 10, 2010
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BC Wildlife Federation believes it is critical to allow the 2007 Provincial Wildlife Allocation Policy to be implemented before any changes are made. There was a huge expenditure of time, energy, and resources placed in the new product. It needs an opportunity to be acted upon for the benefit of all residency groups. Lack of understanding has been the catalyst for creating so much fear. It may be beneficial that training occur so clarity regarding the policy exists.

Yours in conservation,

A handwritten signature in black ink, which appears to read "Wilf Pfeiderer", is positioned above the printed name.

Wilf Pfeiderer
BCWF Wildlife Committee Chair
BC Wildlife Federation

cc: The Honourable Barry Penner, Minister of Environment
Mr. Doug Konkin, Deputy Minister Ministry Environment
Mr. Ralph Archibald, Assistant Deputy Minister Environmental Stewardship
BC Wildlife Federation Membership
BC Wildlife Federation Wildlife Committee



Reference: 122191

Hello Regional Managers:

Concerns have been expressed by members of the guide outfitting community that they have little indication of what their quotas will look like in 2012, under full implementation of the Harvest Allocation policy and procedures. I am aware that some regions have provided preliminary 2012 quotas to guides in their region, as a way of preparing them for the next allocation period.

I am asking that all regional staff be as open and as transparent as possible when dealing with guide outfitters and resident hunters, with respect to full implementation of the allocation procedure in 2012. If you are considering calculating potential guide outfitter quotas for 2012, please ensure that you:

- 1) Use the allocation splits as determined in 2007, prior to the application of the 20% hardship guideline;
- 2) Do not apply a 20% hardship guideline to an individual guide outfitter;
- 3) Do not apply any success factor to guide quotas;
- 4) Apply the allocation split to the portion of the AAH within each guide outfitter's territory (i.e. area-based); and
- 5) Use the current AAH, unless you have information that the AAH in 2012 will be different. Please ensure stakeholders understand that this information can change with updated information.

I recognize that the March workshop with your staff will enable a much more detailed discussion on 2012 allocations. However, by following the above guidelines my sense is that we should be able to provide a fairly reliable estimate of what quotas in 2012 could look like, so that individual guide-outfitters may start to plan accordingly. Stakeholders must be informed that any information provided to them prior to 2012 is our best estimate, and subject to change.

If you have any questions, please contact Gerad Hales, Wildlife Policy Unit Head, at 250-356-3089.

Tom Ethier
Director