

February 13, 2018

The Honourable Doug Donaldson
Minister of Forests, Lands and Natural Resource Operations,
and Rural Development
PO Box 9049, Stn Prov Govt
Victoria, B.C.
V8W 9E2

Dear Minister Donaldson,

Ordinarily I would not write to you about such an issue, but I believe you should be aware of proposed changes to the moose hunting seasons for Skeena South as this is in your backyard. Our BCWF members in the Skeena region are extremely upset with the proposed changes suggested by your regional staff for the 2018-19 season.

Your regional staff proposal has two options: 1) reduce the general open season from seven days to three days for bull moose or 2) maintain the seven-day general open season, but restrict the harvest to bull moose with at least one antler that is a spike or fork. Both of these proposals are specifically targeted only at the resident harvest and regional staff are unwilling to change.

The rationale for the proposal indicates that the annual allowable harvest must be decreased from the previous five-year allocation period for a variety of reasons including reduced population estimates, poor bull/cow ratios, adjustments to population management unit boundaries and an increase in First Nations' requirements. The rationale also implies that resident hunters are likely exceeding their allocation largely due to the seven-day general open season and therefore it is essentially resident hunters who are the targets of reduced opportunity this coming season.

The BCWF contends that the issue is not so much one of conservation, but rather an error in total allocation of moose in Skeena South. The February 2015 allocation decision by then Minister Thomson of FLNRO set the split for moose in Region 6 South as 75% for residents and 25% for industry (guides). This is in contrast to the rest of the province where the overall average allocation for moose is about 85/15. This anomaly in Skeena South is even more difficult to accept considering the Ministry's own data shows that guides in Region 6 South historically underutilize harvesting their annual quotas. It is our view that resident hunters are being unnecessarily targeted with the proposed 2018-19 regulation while a huge proportion of the combined resident and industry allocation remains unused. This inexplicable situation unnecessarily causes division within the northwest communities.

The regional wildlife biologist in Smithers provided data that shows that 706 of the 1529 moose allocated to guide outfitters in Skeena South between 2012 and 2016 were harvested. In other words, guide outfitters are not utilizing more than half of their allocation — only 12 out of 28 guide outfitters in Skeena South even used more than 50% of their allocation over the previous five-year period. This is your own staff's data that can be readily confirmed by ADM Either. The question is---why can't this unused allocation be assigned to resident hunters? It is clear that there is a significant demand by resident hunters and large-scale underutilization by guided hunters.

The BCWF believes that the status quo of a seven-day general open season for the next regulation cycle is appropriate as the resident hunter harvest, in combination with the largely unused guided hunter allocation, is not likely to cause a conservation issue.

Minister Donaldson we are requesting that your Victoria staff revisit the moose allocation splits for both Skeena South and Skeena North to better reflect resident demand and underutilization by guided hunters. We believe it is high time to correct this glaring inconsistency in moose allocation and demonstrate to resident hunters that your government recognizes fairness and equity in allocation of wildlife amongst all users. On this latter point, the membership of the BCWF passed a related resolution in 2011:

“The BCWF supports and encourages that the allocated splits be a minimum 90% resident/10% non-resident for all caribou bulls, antlered deer, antlered moose, and elk and a minimum of 75% resident/25% non-resident for sheep, goats and grizzly bears in allocated areas and the residents have 100% of the annual allowable harvest in un-allocated areas.”

I am requesting that your Victoria staff re-examine the proposed regulation by your regional staff that unfairly and unnecessarily diminishes resident hunter opportunity.

Yours in conservation,



Harvey Andrusak
President
BC Wildlife Federation

Copies To:

BCWF Region 6 President, David Lewis
David Skerik, Director, Resource Management - Skeena