

Here is a summary of what I have considered and key details of my reasons for this decision. I have been through the whole file set and have considered all submissions from BCWF and CCGOA representatives, including information offered separately by private citizens who took the opportunity to engage in this matter. Thanks for all of the information shared prior to the decision.

The decision is that:

- We will retain a 2 deer limit, with no more than one buck taken in any one of the seasons, and one of which may be antlerless under LEH.
- All bow seasons will remain as they are.
- The early 4 point season (September) will remain as is and where is.
- The general open season for bucks will start on September 10 and will close November 10.
- There will be a 4 point season from the November 21 to 30, but that season will be under a 2 year moratorium to allow monitoring recovery of buck deer as a percentage of the deer population.

I have considered going to an LEH season for 4 point bucks in November. While that approach would clearly be consistent with the provisions of the Wildlife Harvest Policy, there are some challenges with technical procedures to defensibly determine AAH and allocate opportunity to the hunting sectors (not impossible, just difficult and fraught with potential for further sector debate and regulatory complexity). LEH would also, under the existing circumstances, represent a needless constraint on exercise of available deer hunting opportunity. I will be compelled, however, to use this management tool if there is no material recovery of bucks as a percentage of the deer population in two years.

The prospect of maintaining a 4 point season in November, even one of the minimum 10 days is not favorable to the objective of buck recovery in a reasonable time frame. Further the concept is, under the current circumstances and current 2 deer bag limit, inconsistent with the urgent need to allow for improved recruitment of class 4 bucks in the general deer population.

Several submissions included allegations that the proposals prepared by the advisory sub-committee were inconsistent with provincial policy. I do not find any such inconsistency, and I am convinced that the decision I have set out above is well within the bounds of deer management tactics described in the policy.

Submissions also allege inconsistency between regions with respect to opportunity to hunt during the rut, emphasizing the 4 point buck seasons in other regions. Hunting during the rut under current circumstances, when bucks are most vulnerable, is inconsistent with the broadly acknowledged need within this region to recover the buck population. I have examined the seasons in other regions and find that while 4 point seasons are broadly available, no other region allows a 2 deer bag limit. In this region, the two deer limit is possible due to the relatively high overall deer population. However,

when such a bag limit is available in concert with a prolonged 4 point season, reasonable opportunity to achieve buck recovery objectives is pointedly compromised.

I am sensitive to representations made by the CCGOA and BCWF that curtailment of buck hunting opportunity in November will cause a serious impact to both of the sectors. The submissions received signal some internal disagreements over the means to best achieve buck recovery. Information from the sectors suggest a preference for reasonable recovery in the quickest timeframe possible. Some guides indicated by a preference for closure during all of November until recovery is achieved. Other commentary was offered pointing out the impact to guides who have already booked clients for next season, or are promoting opportunities now, especially moose/deer combination hunts. The decision I have made will represent a curtailment of commercial opportunity, but I believe the regime I have set out above is a balance of the approaches that were most often discussed by BCWF and CCGOA membership.

The decision reflects a balance of impacts to all hunter sectors. Hunting opportunity is retained to the extent possible under the circumstances, given that we are striving to maintain a simple, effective regulatory regime that would recover the buck population in a reasonable time frame.

- Resident hunters will lose the opportunity for hunting large bucks during or after rut. Some opportunity may be recovered after two years given reasonable measures of success in buck recovery.
- The commercial sector loses the opportunity to guide combination moose and deer hunts for the 5 days between November 10 and 15. The late season opportunity for 4 point bucks may be recovered in two years.
- Within two years, given that we can discern a reasonable upswing in bucks as a percentage of the deer population, we will be able to confirm lifting of the moratorium on the post-rut 4 point season.
- A failure of the buck recovery initiative after two years will require implementation of a November LEH rifle season for resident hunters and quotas for the commercial sector, likely for any buck, that would be designed to limit and distribute buck harvest, while attempting to sustain some measure of hunting opportunity during a time period important within deer hunting traditions.

Rodger Stewart
Regional Manager
Environmental Stewardship Division
Ministry of Environment
400 - 640 Borland Street
Williams Lake, BC
V2G 4T1
cell (250) 305 8536, desk (250) 398 4549
fax (250) 398 4214