

OCT 16 2009

BRITISH
COLUMBIA

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Reference: 112183

OCT 14 2009

Wilf Pfeleiderer
Chairman,
BC Wildlife Federation Wildlife Allocations Committee
Unit 101-3060 Norland Ave.
Burnaby BC V5B 3A6

Dear Mr. Pfeleiderer:

Thank you for your letter of August 14, 2009, regarding moose quotas for guide outfitters in the Cariboo Region (Region 5).

The majority of information provided in your letter is correct, specifically:

- A. The Harvest Allocation Implementation Plan for 2007-2011 does state that "the Director should not alter the smaller share of the existing allocation by more than 20% (increase or decrease)."
- B. The allocation split for bull moose in Region 5 is currently 79:21 (resident:guided hunters), changing from the status quo of 78:22 previous to 2009.
- C. The Regional Manager did, in most cases, limit the decrease and increase of individual guide outfitter quotas to approximately 20%.

Prior to the implementation of the new allocation and the quota procedures, the process by which individual guides received quota was not consistent across the landscape, i.e. in many instances, each guide outfitter was a unique case. These inconsistencies were stripped away during the allocation review, and now there is a consistent approach to apportioning quotas to guides. However, due to these historic inconsistencies, when it came to set quotas in 2009 for moose in Region 5, it was determined that a large number of guides would realize a significantly decreased quota for the 2009-2011 transition period; the majority seeing a greater than 25% decline and some with a decrease of 60% to 80%. The significant drop to some guide outfitters was considered an unreasonable hardship, and so the 20% hardship guideline was applied to individual guide quotas.

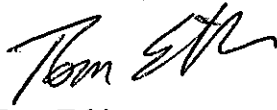
I consider the action of applying the 20% hardship rule to individual guide quotas to be reasonable, and consistent with the Harvest Allocation Implementation Plan for 2007-2011, and its intent to minimize hardship to one or another hunter group during the transition period. Although the Implementation Plan does not explicitly state that the 20% hardship guideline

should be applied to individual quotas, doing so is prudent. Had the 20% hardship guideline not been employed for individual guides, many guides in Region 5 would have suffered significant and immediate losses in clientele and business viability. Please note, however, that at the conclusion of the wildlife allocation transition period, the Ministry will move to full implementation of the policy/procedure, and the 20% hardship guideline will not apply.

Regarding your request to be notified should the moose Annual Allowable Harvest change in the future, the Regional Manager in Region 5 will provide such information at the regional wildlife advisory committee meetings held each fall, as per current practices.

Thank you for your continued interest in wildlife conservation of British Columbia.

Sincerely,



Tom Ethier
Director