

July 31, 2018

To: Engagement BC

RE: Improving Wildlife Management and Habitat Conservation in BC

The BC Council of Forest Industries (COFI) is pleased to submit comments on the discussion paper *Improving Wildlife Management and Habitat Conservation in British Columbia*.

BC's forest industry takes great pride in our commitment to being a world leader in sustainable forestry and recognizes that healthy forests are part of the ecological and natural heritage of our land base. We look forward to continuing to work together with the Province of British Columbia to deliver world-class species and forest management.

COFI submission highlights that BC should develop a formal, comprehensive strategy to govern wildlife management in the province. We offer our view as follows:

- COFI supports government's objective to advance meaningful relationships and reconciliation with the Indigenous Peoples. The forest sector plays an important economic role in many Indigenous Peoples' economies, providing family-supporting jobs, business opportunities, and economic agreements. In creating policies and programs to advance reconciliation, COFI supports the creation of a clear decision-making process and structure that will provide positive and predictable outcomes in the management of the Province's wildlife resources.
- COFI believes that a new governance model for wildlife management and habitat conservation must be transparent and open, meaning that the ministries with the responsibility for wildlife and species at risk management are working together and aware of their respective objectives and initiatives, rather than taking a siloed approach.
- COFI also believes it is necessary to enhance data collection and develop reliable wildlife and habitat inventories. Furthermore, research-based recovery strategies should be focused on achieving successful outcomes, rather than the simple measure of habitat protection to determine success.
- It is COFI's view that the most effective approach to wildlife management will be multi-species and ecosystem-based in order to support biodiversity in our forests, rather than focusing on one species at a time.

The BC forest industry believes in our role as a world leader in sustainable forestry, and that we can play a role in wildlife management and habitat conservation in the province. Should you require any additional information or clarity on the COFI response, please do not hesitate to contact me.

Sincerely,



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Vice President, Forestry

cc. Tom Ethier, Assistant Deputy Minister, Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Jennifer McGuire, Assistant Deputy Minister, Ministry of Environment and Climate Change Strategy

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COFI Response to Government Engagement on IMPROVING WILDLIFE MANAGEMENT AND HABITAT CONSERVATION IN BC

1. Advancing Reconciliation with Indigenous Peoples

What programs and policies are most important to advance meaningful and lasting reconciliation with Indigenous peoples and help implement UNDRIP?

- The BC Council of Forest Industries (COFI) supports government's objective to advance meaningful relationships and reconciliation with the Indigenous Peoples and recognizes the important role that the forest sector will play in achieving this. Currently, the forest sector is a key contributor to many Indigenous peoples' economies by providing employment and business opportunities. This role is expected to increase as Indigenous peoples acquire more forest tenures, enter into joint venture and develop more business relationships with existing forest companies.
- The forest industry supports Indigenous reconciliation through a number of economic agreements between COFI members and Indigenous communities. Many of these agreements around the province include innovative governance commitments that are consistent with the implementation of UNDRIP and can support Crown-Indigenous government processes. As such, COFI is interested to work with the provincial government to determine how we can facilitate reconciliation relative to sustainable wildlife management.
- While the provincial government's efforts to advance the framework for reconciliation through the draft 10 Guiding Principles document are broadly supportable, it's success, from a forest sector perspective, depends on certainty and clarity in government decision-making. Where government includes wildlife programs and policies to advance reconciliation, a key principle must be to provide clarity on a clear decision-making process and structure that will provide positive and predictable outcomes in the management of the Province's wildlife resources.

2. Increasing Involvement and Shared Stewardship

How should a broad range of stakeholders be involved in wildlife management and habitat conservation decisions?

- Consultation and engagement of relevant stakeholders must be a key requirement of government ministries as it can enhance the effectiveness and improve the quality of decisions. Engagement will be most effective if stakeholders are consulted prior to, during

planning and after implementation of decisions made, so that stakeholders can provide input on the process. Promoting collaboration will support and enable the work of those best able to act by utilizing proven innovative tools, methods and systems to achieve desired wildlife outcomes.

- It is important that decisions related to the management of wildlife including species at risk are supported by science, evidence and sufficient rigour. This information could include sound approaches that are supported by credible scientific and technical data (best available information), traditional ecological knowledge, stakeholder operational research and community knowledge. However, once all the input is considered, there needs to be a transparent separation between science advice (which describes the species characteristics) and government decision making (which designates actions/protections) that can consider broader implications. Government should be obliged to provide supporting rationale for all such decisions.

What are your suggestions for a new governance model for wildlife management and habitat conservation?

- The new governance model must operate under a model of transparency and openness and be science-based. The current model can be improved by ensuring that ministries with the responsibility for wildlife and species at risk management are linked and aware of their respective objectives and initiatives. Applicable legislation should be consolidated so the Province has a consistent set of statutes and regulations that apply to all stakeholders and resource users. The current mix of overlapping legislation and various ministry accountabilities causes inconsistencies as well as inefficiencies. For example, the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) is responsible and accountable for this Wildlife and Habitat Management Review while the Ministry of Environment and Climate Change is responsible and accountable for the development of provincial Species at Risk (SAR) legislation.
- In order to ensure transparency and accountability, the policy process and management decisions should be reviewed periodically to ensure desired conservation outcomes are achieved. Transparency is interpreted to mean that decisions are clearly articulated, the rationales for these decisions are fully explained, and the evidence on which they are based is publicly accessible. To be effective there is a need for ongoing monitoring and effectiveness evaluations at all stages to assess the viability of plans and actions towards achieving management objectives. The results from the monitoring and effectiveness evaluations, tied to identified metrics, should be publicly reported on a regular basis.

3. Declining Wildlife Populations

What measures need to be taken to proactively manage wildlife and habitat and prevent wildlife from becoming species at risk?

- The first step the Province should take is to review and assess what has been achieved to date in the management of wildlife and their habitat. Wildlife Habitat Areas (WHA), Wildlife Habitat Features, Wildlife Management Areas, General Wildlife Measures, Ungulate Winter Ranges, legally established Old Growth Management Areas, parks, protected areas, and other Special Conservation areas now cover over 52.3% of the provincial land base. Despite this significant area under some form of protection or conservation designation, little follow-up work has been completed to assess the overall efficacy in managing wildlife populations. For example, once an area is designated as a WHA, it stays that way with little if any assessment to determine if it contributes to what it was established for in the first place.
- Second, reliable wildlife inventory information is a necessity with recent significant changes across the provincial landscape resulting from beetle epidemics, wildfires, land-use orders restricting resource development (i.e. Wildlife Habitat Areas, Old Growth Management Areas, etc.) as well as the establishment of protected areas and conservancies. Having a reliable and current species population inventory is essential as it provides government and industry the tools on how we collectively manage wildlife including species at risk on a go forward basis.
- In addition to having sound wildlife inventories, there is a need to have solid science-based data on habitat inventories (forests, eco-systems, aquatic resources etc.); both the current state and the potential state if appropriately managed. If the government is expected to set and manage wildlife population targets, they also need to know that there is sufficient habitat to support those targets, or sufficient opportunity to manage habitats to achieve the desirable conditions. Considering that all habitats are dynamic, specific set-asides (WHAs, parks, ungulate winter ranges etc.) are unlikely to achieve wildlife management goals over the long term. Active habitat management that allows for forest management, with appropriate accounting of temporal and spatial targets for both forest and habitat values is more likely to succeed (this is the basis of the Performance Area Land Management (PALM) project analysis that DR Systems is running with support of the Chief Foresters Leadership Team) in Southeast BC.
- The lack of current wildlife data is more acute for areas located within parks and protected areas. One of the key outcomes from this review would be a government commitment to provide stable and adequate funding for a wildlife inventory program. Only through sufficient and reliable inventories can such data be considered science based and sufficiently rigorous to support wildlife management and attendant land-use decisions. With ever increasing demands on the province's forested land base, the risk in decision making is elevated if such decisions are made based on limited or faulty information. Reliable and fact-based inventories will improve the province's ability to maintain and demonstrate sustainable wildlife management and how such management adapts to changes over time.
- A third measure that should be taken is to ensure all threats to a given species are considered. The current approach is to focus on putting habitat aside even in situations where habitat quantity and quality may not be the limiting factor on species populations or their ability to recover. In such cases focus should be on identifying the primary threats to a

given species and implementing actions accordingly with some credible level of science-based data.

4. Increasing Human Activity

What is the most effective way of ensuring that wildlife and habitats are healthy while fostering a healthy economy to ensure life is affordable for British Columbians?

- Wildlife and habitat policies need to recognize the increased demands on the landscape as well as the changing societal values. Policy development must also account for the fact that forest resource management is not static but can and should be adjusted based on combining new scientific and socio-economic information to improve the conservation of species as well as sustaining the productivity of our forests across ecosystems and over time. As such an adaptive management approach needs to be an explicit principle in order to provide the opportunity to assess options that not only foster better on the ground stewardship, but also address basic socio-economic outcomes.
- In addition, COFI suggests enabling policies to manage for multiple species (not current one-species-at-a-time approach) on an ecosystem or broad landscape basis will provide more management options as well as more successful outcomes. This management approach can provide opportunities on both a spatial and temporal scale to provide benefits to a variety of wildlife species as well as other societal values. In some areas of the Province and for specific species, consideration of effective human access management will be required. Policies that will limit human access (i.e. road closures, back country bans for specific activities, etc.), should be developed through stakeholder engagement.

5. Wildfires and Extreme Weather

What are the most effective ways to proactively adapt to the impacts of climate change to wildlife and habitats?

- It is becoming evident the risk of an extreme or catastrophic event occurring is increasing and when one occurs it will also be greater in intensity. To reduce the risk and intensity of these events and to enable effective wildlife/habitat policies, there is a need to manage our forests differently. That is, instead of having a “preservation focus” management approach, forest management policies should shift to a focus on achieving healthy forest structures. Achieving healthy forests will result in improved wildlife habitat and likely reduce the wildfire risk (less fuel loading) as well as more resilience to pests and infestations.
- Enabling policies to manage for multiple species on an ecosystem or broad landscape basis will provide more management options as well as more successful outcomes as the climate changes. This management approach can provide opportunities on both a spatial and

temporal scale to provide benefits to a variety of wildlife species as well as other forest related societal values.

- Wildlife management policies including species at risk, need to recognize that forest structures and forest resource management actions continue to evolve in response to natural and human-induced changes as well as climatic changes. However, many of the province's conventional protection and habitat considerations (Protected Areas, WHA's, UWR's etc.) have treated forest habitats as static, utilizing a simple lines-on-a-map approach to establish specific designations for specific species. Clearly, active management of forest ecosystems can provide opportunities on both a spatial and temporal scale as each stage of forest succession provides different benefits to a variety of wildlife species. In fact, many species require more than one forest type to meet their lifecycle needs.
- It will be important when establishing wildlife management policies to allow for significant flexibility as we collectively get an understanding of how BC's forests are reacting to changes in climate and how these changes are impacting habitat attributes that support wildlife populations. As changes in climate and other disturbance events (catastrophic wildfires, beetle infestations, drought, etc.) alter forest cover, stand and tree species composition, emerging wildlife species vulnerabilities could likely vary across the province. As such, adaptive management needs to be a key foundation of wildlife and habitat management in order to provide the opportunity to assess management options that not only foster better on the ground stewardship, but also address basic socio-economic outcomes.

6. Better Information

How can Traditional Ecological Knowledge, citizen science and other forms of knowledge complement science to support decision-making?

- It is important to recognize the role that all British Columbians may have in government's goal to improve wildlife management and habitat conservation. By so doing government can send a signal that encourages different entities to provide relevant information to supplement science-based decision making. The opportunity to provide verifiable input could also encourage these entities and other stakeholders to participate in conservation activities. However, government decision makers need to ensure information provided, regardless of submitting entity, is credible and supported by significant science-based data. Examples include motion detected cameras installed on private property with assistance monitoring equipment performance and data collection.
- Collaboration and shared stewardship will likely be enhanced if government is transparent on what data and information provided by stakeholders is included in the decision-making process. This should include good unpublished empirical data resulting from forest licensee operational research and/or trials. It should be incumbent on government to collate data from all known sources into one central data base that can be accessed by all stakeholders. When all relevant data is considered, and a decision is made, the rationale behind the decision must be made available in a transparent fashion.

What are the best ways to share information broadly so that there is transparency and trust is gained among all parties?

- It would appear currently species and threat data often exists but is housed in various ministry “silos” making it difficult to share. This can create a lack of transparency and increases the potential for unnecessary risk if decisions are made without having as much information as possible behind them. Identifying the provincial tools that already exist and removing impediments to collect and utilize this data can be used to address and enhance stakeholder trust.

7. Human-Wildlife Conflicts

What are the most effective ways to reduce wildlife-human conflicts in British Columbia?

- Education is a key factor in the ability to reduce human-wildlife conflicts. WildSafeBC, delivered by the BC Conservation Foundation, has a primary objective of keeping wildlife wild and communities safe by arming British Columbians with the tools necessary to discourage wildlife from lingering in residential areas. These tools, also emphasized by provincial conservation officers as being effective in preventing conflicts with wildlife in urban areas is to put garbage, birdseed, compost and pet food away, and to keep fruit from trees off the ground. Additional actions that could be considered by the Province include:
 - o properly manage wildlife attractants in parks, solid waste facilities, campgrounds, highway rest stops;
 - o consider the impact of new developments on wildlife in decision-making and permitting;
 - o work with businesses and individuals to ensure their activities are aimed at reducing conflicts with wildlife, especially for those businesses that operate in wilderness areas; and,
 - o for specific species, consideration of effective human access management will be required.
- It is recognized that despite our best collective efforts, we can never eliminate the risk of human-wildlife conflict. But it is also imperative that all individuals, BC residents as well as visitors to the province, accept their responsibilities to ensure that humans and wildlife can coexist.

8. Funding

What are the best funding models, funding sources, and creative financing ideas that could increase resources for wildlife management and habitat conservation and provide additional flexibility for how funding is prioritized and allocated?

- Funding should be provided where the Province can experience the best return on investment. The current funding approach appears to allocate the most resources to those species most at risk with likely the lowest chance of recovery. Consistent with the work being conducted by Dr. Tara Martin at UBC, there is a need to reverse the approach as funding amounts are limited, to those species with the greatest chance of recovery as well as the capacity to maintain viable populations.
- There are currently a number of non-Ministry funding sources for wildlife and habitat management in the Province. The Habitat Conservation Trust Foundation is a non-profit charitable foundation acting as Trustee of the Habitat Conservation Trust. HCTF came into existence because its major contributors (hunters, anglers, trappers, and guide-outfitters) were willing to pay for conservation work above and beyond that expected by government for basic management of wildlife and fish resources. To increase funding, government should mimic this model and reinvest revenues generated from wildlife related businesses (i.e. tenures associated with guide outfitters, fishing, wildlife viewing, etc.) back into wildlife management.
- Other funding sources include BC Hydro Columbia Power Corporation, Community Gaming Grants, Environment Canada Funding Programs, Fisheries and Oceans Canada, North Island Conservation Fund, and Pacific Salmon Foundation. There are also specific groups and corporations that are funding individual species such as the Vancouver Island Marmot recovery efforts. There may be additional opportunities for independent funding models developed in collaboration with First Nations, local governments, communities, industry and other stakeholders. It could be beneficial to link these stand-alone funding sources, into an overall strategic funding model that may provide more efficient and focused use of available funds.
- Also, as noted earlier, government should be compelled to provide annual base funding for reliable wildlife inventory information. Having reliable and current species population inventories throughout the province is essential as it provides government and industry the tools on how we collectively manage wildlife including species at risk on a go forward basis. The discussion on base-funding should recognize an on-going need to address access management through stakeholder engagement, landscape-level planning, implementation, monitoring and enforcement.
- The second part of the question is asking how additional flexibility may be achieved for how funding is prioritized and allocated. COFI suggests the work on prioritizing threat management strategies being carried out by Dr. Tara Martin at UBC has significant potential for prioritizing available and sometimes limited funding. The approach being developed uses

state-of-the-art techniques in conservation decision science to identify the most effective and least costly management actions to meet specific management goals.

- The threat management assessment intends to determine the management actions required to abate key threats and ensure the long-term resilience of “natural assets” (plants, animals and habitat) into the future in a given area. This type of analysis can help clarify what can and cannot be achieved for different levels of investment. That is, decision makers can utilize the analysis to estimate the costs and benefits of alternative wildlife, habitat and species at risk management actions.

Additional Engagement Questions

What challenges are we missing?

1. BC’s Jurisdictional Role

The federal Species at Risk Act (SARA) takes precedence over provincial legislation. This can lead to significant problems as the province is accountable to the people who may be affected by any related decisions, not the federal government.

While BC has a strong commitment to species at risk management, experience with a number of SARA requirements and their application has created jurisdictional tension in certain areas. Case in point is the identification and federal designation of critical habitat that can significantly impact the provincial crown land base (i.e. Caribou, Marbled Murrelet, Northern Goshawk, etc.).

From a provincial perspective BC must be able to ensure any decisions regarding species at risk protections, particularly critical habitat, are informed by consultation with directly affected individuals and require an evaluation of socio-economic impacts to stakeholders and the province. The province must continue to work with the federal government to create improvements related to the federal *Species at Risk Act (SARA)* that is consistent with previous provincial communications on this issue, and that respects provincial jurisdictional authority. It is important to have alignment at the federal and provincial level wherever possible to ensure the policies improve wildlife and habitat management as well as the management of at risk species.

2. Multi-Species and Landscape (Ecosystem) Management

The current one-species, one-value-at-a-time management approach fragments the landscape by drawing separate lines on a map for each value, assumes forest management is static and may not address the species needs over time and may result in one species being favoured over another. Co-location pilots across the province have demonstrated there are significant opportunities to more effectively improve the conservation of species as well as sustaining the productivity of our forests across ecosystems and over time. These pilots have

shown co-location provides the ability to optimize the land reserved for wildlife resulting in more land being available to manage for other values.

The conservation of species at risk should embrace the opportunity to utilize a multi-species management approach with the provision for a landscape or eco-system scale when evaluating species and their habitat needs. This broader area-based approach may be more responsive in addressing a number of species habitat needs and also provide more management flexibility and considerations to address socio-economic implications.

3. **Consistent Approach and Application Across All Sectors**

The Province has a plethora of legislative tools that can and do affect Crown land use, with the forest and ranching sector (Forest and Range Practices Act – FRPA) and oil and gas sector (Oil and Gas Activities Act – OGAA) activities being the most regulated. The result unfortunately is an inconsistent approach for managing wildlife and their habitats across different land designations as well as potential impacts from all sectors. This approach makes it a challenge as to how well wildlife and their habitat is managed across the Province. The challenge for the province is to ensure the regulating ministries are aligned and consistent in their approach as to how policies impact both strategic and operational decisions for all sectors including tourism and recreation activities. A consistent approach may also eliminate the potential overlap that exists between different statutes (i.e. Wildlife Act and FRPA).

4. **Management Monitoring and Reporting**

Monitoring and reporting in a transparent manner is required to indicate on how well the Province is doing relative to wildlife and habitat management. The Province has set aside a significant percentage of the Crown forested land base in various protection designations for specific species across the Province. However, follow-up on whether these designations (WHA's, UWR's, OGMA's etc.) continue to be effective for the purpose they were set aside is seriously lacking. To ensure the Province's objectives for wildlife and the management actions required to meet these objectives, it is essential that wildlife populations health is monitored on a regular basis and the results reported out in a transparent manner.

What currently works well in BC for wildlife/habitat management?

A good example of what worked well was a Memorandum of Understanding (MOU) between FLNRORD, BCTS and Coast Forest Products Association. The three parties developed a terms-of-reference which included an accountable process (with a dispute resolution component) for establishing Wildlife Habitat Areas (WHA's) for Northern Goshawk and Marbled Murrelet. The MOU worked well as it provided rigour to the process with industry and government working collaboratively in the establishment of a significant number of WHA's.

What changes in wildlife/habitat management are most needed for BC (i.e., what are the highest priority challenges)?

The changes that are most needed in BC wildlife/habitat management are:

- Clear wildlife and species population objectives established by the Province with management policies and rules applicable to all stakeholders.
- Need population viability analysis when developing management and/or recovery plans.
- Addressing all threats to wildlife, instead of just focusing on setting aside habitat as the only solution.
- Expand on threats-based approach (initiate regional pilots) Dr. Tara Martin at UBC is developing in conservation decision science to identify the most effective and least costly management actions to meet specific management goals.
- Inclusion of climate change analysis of wildlife and habitat management options.
- Measuring and reporting on government's investments (dollar and land budgets, both of which are limited) in wildlife and at-risk species management so we know if objectives are being met and if these are effective over time at achieving intended goal base resource and conservation decisions on transparent science, consideration of socio-economic factors and consultation with all affected parties.

Are there any challenges or opportunities listed that concern you? Why?

Many of the challenges noted have some level of concern as it will be important to ensure that any changes to be implemented are also considered in terms of how they link to or will be impacted by the development of BC's Species at Risk Act and the direction this enabling legislation will take. Clearly the respective resource ministries need to be aware of and be full participants in the development of the Act.

BC needs to develop a formal, comprehensive strategy to govern wildlife management in the province. Such a strategy is needed to inform the development of the Provincial Species at Risk Act. Too many initiatives are single species focused and are being undertaken in isolation of a broader strategy and established priorities. The recent Moose Initiative highlighted the absence of an overall strategy and provided insights on how problematic single species initiatives may be.

BC needs to commit to a base level of funding to improve on information (i.e. inventories) and science upon which to base decisions. In addition, the Province needs to ensure decisions are transparent, based on science and incorporate social, economic and environmental objectives. Currently the limited information base for many species seriously limits assessments to determine the effectiveness of measures proposed and implemented, as well as the impacts of these measures may have on other species, resources and values. Finally, Provincial wildlife management needs to be consistent across all resource sectors and have clear, consistent and effective wildlife and at-risk species objectives.