



Guide Outfitters Association of British Columbia

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Wildlife & Habitat Engagement Response

Advancing Reconciliation with Indigenous peoples

Reconciliation is the reestablishment of friendship or harmony – a bringing back together. We are very much in favor of seeing this take place in our province. There are 26 Indigenous people who own guide outfitting certificates in British Columbia, and many more working in the outfitting industry. We support the protected rights of First Nations peoples to hunt and fish for food, social and ceremonial purposes under section 35 of the Canadian Constitution.

We believe that wildlife is a public resource, should be managed for the benefit of all British Columbians, and that the right and responsibility rests solely with the Province to manage. As we are all Canadians, utilizing the same resource, we believe that there should be a common table for stakeholders in government-to-government negotiations and the development of programs and policies.

In order to improve wildlife management, it is imperative that science, traditional knowledge and sound management lead us. We will all benefit from collaborative conversations that put a priority upon what's best for wildlife. Local knowledge and First Nations traditional knowledge must be incorporated into population models to improve accuracy. Indigenous peoples have a close contact with the land and the wildlife that live upon it. First Nations have traditional territories and have long since assigned a value to wildlife, taking a seven-generations perspective to wildlife management.

Habitat and population monitoring programs for terrestrial wildlife is an imperfect science that often forms a shaky foundation upon which to build a comprehensive strategy for sound management. Until there is confidence in the integrity of the core data, there can be no collaborative and meaningful discussions among stakeholders that result in outcomes that put wildlife first. There are many challenges to conducting inventories; however, it is critical that inventory models include both traditional and local knowledge. *“Essentially, all models are wrong, but some are useful.”* George Box

Increasing Involvement and Shared Stewardship

“Only when the last tree has died and the last river been poisoned and the last fish been caught will we realize we cannot eat money.”

~Cree Indian Proverb

What we appreciate, appreciates. Much more unites us than divides us. Let's put our differences aside and stay focused on our common goal of achieving healthy wildlife populations, for all to enjoy, now and in the future.

While it's important to consult a broad range of stakeholders in wildlife management, it is more important that this is place-based and puts a higher priority upon individuals who are vested in wildlife management. People such as tenure holders, First Nations, and those who have boots

on the ground and live in-area need to be most involved because they possess invaluable local knowledge.

As involvement of stakeholders is increased, care must be taken to evaluate the motives of those contributing. First and foremost, they must share in the common goal of healthy wildlife populations for all to enjoy, now and in the future. Weight should be placed upon the informed, active and directly-engaged users – the ones who have skin in the game and can accurately speak to what is really happening. Extracted from the discussion should be those with uneducated, emotions-based, nonscience-based agendas. We must be mindful of the source of funding for certain organizations, and their larger political motivations. We must ensure that rational thought and science trumps emotion. Otherwise we rob from future generations.

To this end, hunters and anglers need to be recognized for the vital role they play in conservation – as opposed to being vilified for their wild harvests. Our modern, convenience-based society has become increasingly removed from our food sources and the part we play in the bigger picture. Michael Pollan captured it well in *The Omnivores Dilemma: A Natural History of Four Meals* when he stated: *“One of the odder ironies of animal rights is that it asks us to acknowledge all we share with animals, and then act toward them in a most un-animalistic way.”*

Wildlife managers (SDMs) must have performance measures with habitat and population objectives to manage to. So too they need more authority over habitat and land use. Once goals have been established, statutory decision makers must legally consider the actions of their land-use decisions. Wildlife goals must be densities based on habitat capacity. Tough, and often unpopular, decisions must be made in wildlife management. These decisions need to be science-based, rooted in habitat capability and population objectives.

There are many places to which we can look for inspiration and demonstrated success. For example, give a cattleman 100-head of cattle and he will be flexible and strategic to ensure a healthy and profitable cow herd. Yet, give a provincial wildlife manager a herd of moose or caribou to manage and he will watch and count that population decline to zero. This is the heartbreaking reality in British Columbia.

While the cattleman is driven to make a profit and has the autonomy to take multiple factors into consideration – such as cow size, time of calving, carrying capacity of summer pasture and number of graze days, and protection from predators – the wildlife manager has no such authority over other resource use and no power to grow wildlife. Under current government legislation, wildlife managers are without population objectives to manage to. They are hampered by political agenda, public opinion and pressure from big corporations. This leaves them powerless to enact actual change on the landscape. While the cattleman has a stewardship and entrepreneurial mindset and is driven to make decisions in favor of production and profit, wildlife managers have not been empowered to take the steps required to realize change. Without protected sanctuaries, habitat management, or control over resource extraction, their role has been limited to managing hunters.

Citizen science is an important piece of the puzzle. Individuals such as outfitters take a long-term approach to wildlife management and often have thousands of hours on the ground with significant local knowledge. This is mainly because outfitters have defined boundaries and cannot move. Similarly, First Nations have traditional territories and take a seven-generations

perspective to wildlife management. Local knowledge and First Nations traditional knowledge must be incorporated into population models to improve accuracy.

- Local community-based input is crucial
- Inclusion of local and traditional knowledge
- Need a balance of all species across the landscape i.e. predator and prey
- Develop wildlife populations for predator and prey species, based on habitat capability
- Objectives need to be created so everyone understands what we are managing to

Declining Wildlife Populations

Wildlife is a key performance indicator of healthy forests and our forests are not healthy. Without healthy habitats, wildlife cannot thrive. British Columbia is known internationally for the “Super, Natural British Columbia” brand and it is being damaged by the activities of some of the resource sectors. Our forests, water and mountains are not what they once were.

What we have here in British Columbia is special. Wildlife is a valuable resource; it must be seen as such and managed accordingly. We must take a proactive, aggressive action to ensure we grow abundant wildlife populations for all to enjoy, both today and in the future.

To have healthy wildlife populations we need to have healthy ecosystems. Decision-makers need to put a value on wildlife and the habitat they depend upon.

- Wildlife must have a value
- Management plans should be created with population objective for all species.
- Population objectives need to be based upon habitat capability
- The management scale should be at a landscape-level
- Management decision should be based on science
- Wildlife managers should have more authority to use all management “levers” to manage wildlife and achieve the population objectives
- Proactive management is less expensive than recovery management
- Review resource activities and statutes that have an adverse impact to wildlife and their habitat, i.e. free growing

There needs to be a better balance on the landscape. With climate change, beetle epidemics, more access and more change to the back country, there needs to be corresponding change in management. Without it, we will experience more population declines. As we look to the future we need better decision making to benefit our wildlife and the habitat it requires. We need to assign a value for wildlife so that it is considered when making decisions. Wildlife managers need objectives to manage to, based upon habitat capability. The foundation of sound wildlife management is science-based decisions.

Better balance requires inclusion of the broader natural resources sector in British Columbia. Two excellent examples of effective, cohesive wildlife management are the proposed Natural Resource Practices Board (NRPB) and the long-standing Muskwa-Kechika Management Area (M-KMA). The M-KMA was designated in legislation in 1998 and is “*where world class integrated resource management decision-making is practiced ensuring that resource development and other human activities take place in harmony with wilderness quality, wildlife and dynamic ecosystems on which they depend.*”¹ British Columbia deserves the type of world class wildlife management demonstrated by these models.

¹ Muskwa-Kechika Management Area, <http://www.muskwa-kechika.com>, accessed May 11, 2018.

For many reasons, there has been a significant and unsustainable increase in the annual allowable cut. Over many years, this elevated cut has scarred our landscape. Increased logging has resulted in increased roads and many unintended consequences to wildlife. Current silviculture regulations encourage forest licensees to spray the forests with poison to reach 'free growing' objectives. These practices are having detrimental impacts to wildlife. Government inventories have documented 50-70% declines in moose populations in some regions. This has had a negative impact on outfitting businesses and is reducing the ability of some First Nations to fulfill their food, social and ceremonial rights.

GOABC welcomed the review of the professional reliance model and believe the resulting report to be a good start; however, other policies and regulations also need to be reviewed, i.e. free-growing. Habitat loss is the greatest threat to wildlife and more work needs to be done in this area to stop more species from being added to the list of species at risk.

It is difficult to make changes with some of the current legislation in place. For example, the Forest and Range Practices Act (FRPA) states: "*the objective set by government for wildlife and biodiversity at the stand level is, **without unduly reducing the supply of timber** from British Columbia's forests, to retain wildlife trees*"² and the Ministry of Environment's control refers to a "***one per cent impact limit** on provincial short and long-term timber supply.*"³ Laws such as these impede advancement. Furthermore, FRPA's free growing legislation⁴ has unintended consequences for wildlife. It promotes the broad use of herbicides that kill the deciduous forage needed for many wildlife species, and the application of fertilizers that kill many bird species. As these old practices come under increasing scrutiny it is another indicator of the need to overhaul outdated legislation.

Tough decisions must be made in wildlife management. These decisions must be science-based, rooted in habitat capability and populations objectives. Wildlife managers need to be empowered as their own entity so that they can do what needs to be done. This may include such things as limiting access, limiting resource extraction, protecting land and reducing predators. Not always popular decisions when managing to an objective.

Efforts need to be focused within the scope of impact. There are things that we can control (logging, access, habitat protection, predator density, etc.) and things we cannot (climate change, natural disasters, etc.) Let's focus our resources on the factors we can make a meaningful impact upon.

At the same time, we must increase our pace. Studies have been conducted in this province for decades. We now must recognize the urgency of taking proactive and productive action and take steps based upon what the results of those studies are telling us. Studies are not to be shelved; they are to be learned from and applied.

At this stage in the game, we may be forced to apply a triage approach and focus our efforts in the areas of the province, and on the strategies, that will maximize the number of survivors.

² Forest and Range Practices Act – Forest Planning and Practices Regulation, Section 9.1, Objectives set by government for wildlife and biodiversity – stand level

³ Ministry of Environment, Environmental Stewardship Division, Identified Wildlife Strategy, frequently asked questions, http://www.env.gov.British Columbia.ca/wld/frpa/iwms/strategy_docs/faq.htm, accessed May 10, 2018.

⁴ Forest and Range Practices Act – Forest Planning and Practices Regulation, Section 29, Free growing stands

So too, we need to track our results. We must know what impacts our efforts are having – both positive and negative – and be aggressive in our efforts to achieve specific population-recovery goals.

Primary Prey

GOABC is alarmed by the suggestion that primary prey theory be expanded as a method of addressing declining wildlife populations. We are adamantly opposed to this impractical and dangerous approach. We see primary prey theory as a passive and simplistic proposition that does not address the immediacy of the predator problem nor the complex predator-prey relationship. It is a pilot project at best, still lacking adequate evidence that it actually works.

Predator control **MUST** be something we do – if we do not, all wildlife will pay the ultimate price. We need clearly defined population objectives for all species. When we observe an imbalance in the predator/prey dynamic, we must then take the appropriate action. Predator control is a critical – and perhaps the **most** critical – component of moose and caribou recovery. To this end, predator control should be used proactively and consistently until both predator and prey populations are within the desired density.

We recognize that culling predators is an emotionally-charged issue. However, we must set our fickle emotions aside and adhere to science-based principles and do what is best for wildlife. As stewards of this majestic resource, we must not allow emotional social responses to trump science and prevent the appropriate management of our wilderness.

The caribou maternal penning program cost roughly \$350,00 per year over 15 years to realize an increase of seven caribou. SEVEN?!? Are the costs of this program even coming close to the population gains being achieved? Unless we are going to fence off all of British Columbia, maternal caribou penning is impractical. Are we investing vast resources simply to delay the inevitable? If we're only serving to make the predator's next meal a bit larger, more filling and less instinctually-capable of escape, what have we gained? Sounds more like a predator feeding program than a prey recovery program.

In October of 2016 the province committed \$1.2 million to assisting in moose population recovery. Since that time, we have observed various methods of dealing with the situation that seem limited to observing the decline, without the application of corrective action. Managing populations to zero is simply not acceptable. We want the management levers outlined in the *Provincial Framework for Moose Management in BC* to be used to recover moose.

The Al Gorley report outlined multiple proactive actions that need to be taken. We participated in this process and would like to see more action, especially in the following areas:

1. Develop population objectives for moose (and all other species) and have wildlife managers maintain populations at those levels;
2. Incorporate proactive predator management to maintain a proper balance on the landscape;
3. Deactivation of in-block roads and replant with deciduous trees;
4. With the amount of development there needs to be better access control. We support ATV restrictions in critical moose population areas during moose season;
5. Ask forest licensees not to use herbicide (to reach the free growing requirement);
6. Review free growing legislation because it is causing unintended consequences for wildlife; and

7. Consider wildlife when evaluating salvage permits for burnt areas. We have just created wildlife habitat.

We must be aggressively proactive otherwise we will lose everything that makes this province super, natural, beautiful British Columbia – and the envy of the rest of the world.

Increasing Human Activity

We live in British Columbia because we love British Columbia. But to live here, we must work here. We have something in this province that the rest of the world only wishes they had. But we are losing it at an alarming rate. A balance must be struck between sustaining our lifestyle and preserving our lifestyle.

What we appreciate, appreciates. We must assign values to things beyond rocks and trees and never allow an insatiable desire for natural resource extraction to trump what makes British Columbia a super, natural place to live. To that end, we must put a value on wildlife and take the necessary steps to conserve it. It is the ultimate renewable resource – and needs to be cared for with keen stewardship.

The expansion of the natural resource sector over the last decade has resulted in the new construction of thousands of kilometers of resource roads. These roads are having significant and unintended consequences on moose and caribou populations. It's these lineal features that help predators be more effective and gain an unfair advantage on their pursuit of game, which we are witnessing in the current devastation of our ungulate populations. This access needs to be managed through the development of clear access management objectives and procedures. The maximum road density should be 0.6 km/km² moose habitat with an objective of maintaining road density less than this depending upon regional plans.

Wildfires and Extreme Weather

The climate is changing, and we cannot continue to follow the same practices in the face of it. We must take action to adapt. Dr. Scott Stephens, Professor, Wildland Resource Science, University of California, Berkeley has stated that, unless we take deliberate action, within 10 years British Columbia will be what California is today with regard to wildfires. Key measures he recommends include utilizing a preventative burn program to help protect communities and managing the size and scale of wildfires. Additionally, we need a variety of each age class and species of vegetation in the forest, and a wider variety of tree species, specifically deciduous that are more resistant to fire and provide additional cover and food for a variety of wildlife species.

The 2017 wildfires were the worst in British Columbia's history. The province is divided into guide territories that range in size from 400 km² to 26,000 km². Many family guide outfitting businesses were on the front lines and were directly impacted, specifically in the Chilcotin and East Kootenay regions. The damage ranged from access closures to loss of structures and habitat.

As we recover from the fires, we are very concerned about the rush to immediately start salvage logging and replanting these areas without any other considerations. The fires have created critical habitat for wildlife. Now is the time for government to review stocking standards and silviculture practices to ensure the imminent salvage decisions are going to benefit the ecosystems and the animals that live in them.

Our specific post-fire salvage logging concerns are:

- Road density and access on wildlife
- Soil damage and erosion
- Damage to seedbanks and transfer of invasive and noxious weeds
- Impacts on hydrology and fish
- Retention of burnt snags to provide some summer heat thermal shade cover for wildlife
- Post-harvest stocking standards which suppress wildlife populations

Fires on our landscape are natural and benefit overall forest health. Our native fish, wildlife, grasses, and trees evolved with wildfire as an essential component of the natural process. Disturbance through fire is one of the best tools we have to maintain and restore wildlife populations. Wildfire opens the forest canopy, allows native grasses and herbaceous plants to grow, which increases native wildlife abundance and diversity. Through proper land management practices using ecosystem restoration and controlled burns, we can protect our communities, and restore dwindling wildlife populations.

If we rush to replant these dry forests at densities consistent with current stocking standards, we will end up with unhealthy drought-stricken trees, which will reduce ecosystem diversity and suppress native wildlife populations. Over time, this will increase fuel loading, only serving to intensify British Columbia's next firestorm.

The status quo approach neglects wildlife values. In its current form, the *Forest and Range Practices Act* does not address the needs of wildlife post-fire. We need a new process that focuses on wildlife and habitat values. First Nations, stakeholders, researchers, and industry must be at the table so that multiple values are represented.

The 2017 fires present us with an opportunity to do things differently in British Columbia, to take care of our environment, restore our ecosystems, and protect the interests of future generations.

Climate change is altering climatic conditions faster than animals and plants can adapt and as part of that, we expect herd health to become an increasing issue. Simultaneous changes make it virtually impossible to figure out how much anything is affecting each factor. Shorter, milder winters are producing a surge of insidious parasites that suck the life force from wildlife. We are seeing epidemics such as moose ticks, moxi (*Mycoplasma ovipneumoniae*) and sarcoptic mange. What actions we need to take is still up for research and debate; however, as a start, we need to do a better job of keeping wild animals separated from domestic herds.

The guide outfitting industry is gravely concerned – and perplexed – at how little is currently being done to ensure that disease transmission between domestic and wild sheep is prevented. Bighorn sheep are an iconic species in British Columbia, even gracing our provincial coat of arms. They have significant economic value to our industry as well, drawing international clientele to our region. The current market value of a bighorn ram is between \$25,000 and \$60,000 USD. When British Columbia provided a special permit to be auctioned at the 2018 Wild Sheep Society Fundraiser in Reno, Nevada, \$250,000 was raised for wildlife conservation. Based on these numbers alone, the value of these animals can be appreciated not just economically, but intrinsically.

Better Information

Inventory in our diverse and rugged province is poor, at best. Not only is access an issue, but time of collection is an impairment to gathering accurate information. Despite extensive data

collection, with habitat and population modeling there is always a degree of uncertainty and a potential for error. Modeling often over-simplifies complicated interactions. As a result, the inclusion of Traditional Ecological Knowledge and citizen science is a vital component in the collection of relevant and accurate information to validate or improve the current inventory methods. New inventory techniques such as drones and infrared need to be explored as a cost-effective solution to the predominantly visual aerial survey techniques currently utilized in British Columbia.

Dr. Susan Kutz, Professor in University of Calgary's faculty of Veterinary Medicine, has worked extensively to incorporate citizen science into her research models. She has established that citizen science is an important piece of the puzzle. Individuals such as outfitters take a long-term approach to wildlife management and often have thousands of hours on the ground with significant local knowledge. This is mainly because outfitters have defined boundaries and cannot move. Similarly, First Nations have traditional territories and take a seven-generations perspective to wildlife management. Local knowledge and First Nations traditional knowledge must be incorporated into population models to improve accuracy.

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Human-Wildlife Conflicts

We should expect more human-wildlife conflicts because there are more bears and more people, as well as more people accessing the backcountry. Therefore, good programs such as WildSafeBC should be utilized and expanded upon to ensure British Columbians are aware of the role they play in keeping wildlife wild and their communities safe. Where appropriate, hunting can be a valuable tool for managing wildlife populations and British Columbians should be educated about the role hunters and anglers play for the benefit of all.

Funding

"If it pays, it stays."

The model of hunters and anglers paying the HCTF is a great model; however, we are disappointed with the lack of funding we're seeing for projects related to caribou and moose. We are displeased when inventory work that should be done by government, as part of government's core responsibility, is being funded by HCTF instead.

A couple of great funding examples we can look to are the Pittman-Robertson Act, and the Dingell-Johnson Act. Both acts demonstrate that when users see their money being invested back into the resource, they are willing to pay. Applied in British Columbia, this type of model would include placing an excise tax on certain products, including non-consumptive users, producing a bigger catchment. Everybody who goes into the backcountry should contribute to the protection and maintenance of the resource.

From Wikipedia July 26, 2018:

The **Federal Aid in Wildlife Restoration Act of 1937** is most often referred to as the **Pittman–Robertson Act**. Prior to the creation of the Pittman–Robertson Act, many species of wildlife were driven to or near extinction by commercial/market hunting pressure and/or habitat degradation from humans. The act created an excise tax that provides funds to each state to manage such animals and their habitats.

The Pittman–Robertson Act took over a pre-existing 11% excise tax on firearms and ammunition. The money is kept separate and is given to the Secretary of the Interior to distribute to the States, based upon a formula that takes into account both the area of the state and its number of licensed hunters.

States must fulfill certain requirements to use the money apportioned to them. None of the money from their hunting license sales may be used by anyone other than the state's fish and game department. Plans for what to do with the money must be submitted to and approved by the Secretary of the Interior. Acceptable options include research, surveys, management of wildlife and/or habitat, and acquisition or lease of land. Once a plan has been approved, the state must pay the full cost and is later reimbursed for up to 75% of that cost through P–R funds. The 25% of the cost that the state must pay generally comes from its hunting license sales.

This piece of legislation has provided states with funding for research and projects that would have been unaffordable otherwise. According to a U.S. Fish and Wildlife Service webpage that was updated in January 2010, over two billion dollars of federal aid has been generated through this program, which in turn means that states have kept up their 25% contributions with over 500 million dollars.

The habitat acquisition and improvement made possible by this money has allowed some species with large ranges such as American black bears, elk, and cougars, to expand their ranges beyond their normal boundaries prior to the implementation of the act. Important game populations such as white-tailed deer and several Galliformes have also had a chance to recover and expand their populations.

The **Dingell–Johnson Act**, also called the **Federal Aid in Sport Fish Restoration Act**, is a United States federal law from 1950 that authorizes the Secretary of the Interior to provide financial assistance for state fish restoration and management plans and projects.

Another concept is to apply a one dollar per cubic meter tax to stumpage that would be directed to wildlife and habitat enhancement. It's a small price to pay for the destruction of our forests and would add up to millions.

Summary and Additional Suggestions

Wildlife First: To have healthy wildlife populations we need to have healthy ecosystems. Decision-makers need to put a value on wildlife and the habitat they depend upon.

Wildlife must have a value: Our biggest concern is that, currently, wildlife has no value. It is not considered in land-use decisions, and without a value on wildlife, there is no consideration for its habitat in resource-extraction decisions.

Accountability and Empowerment: Wildlife managers (SDMs) must have performance measures with habitat and population objectives to manage to. They need more authority over habitat and land use. Once goals have been established by statutory decision makers, wildlife SDMs can then be held accountable in relation to the achievement of those objectives.

Education: The public needs to understand that animals are not cute and cuddly Disney characters. Government has an obligation to legitimize hunting as a viable – and sustainable – food source, and to demonstrate that hunting plays an important role in wildlife management.

Primary Prey: Predator control MUST be something we do – if we do not, wildlife will pay the ultimate price. GOABC is opposed to this impractical and dangerous approach.

Citizen Science: Local knowledge and First Nations traditional knowledge must be incorporated into population models to improve accuracy.

Outfitting Legislation: All regulations surrounding outfitting in British Columbia help to ensure lawful hunting and improve public safety. There is opportunity to make improvements in legislation to increase business certainty and investor confidence. This would enhance economic development and increase wildlife stewardship. Improved outfitter legislation would include:

- Professional reliance and self-regulation
- Modernize licence issuance
- Legislation to improve bankability
- Reduce “red-tape”

These changes will create more jobs and more wildlife. This could be delivered through a DAO model.

Delegated Administrative Organization: The establishment of a Delegated Administrative Organization (DAO) in the outfitting sector would be a valuable concept worth exploration. A DAO would increase accountability structure and lead to a higher level of professionalism in the industry, increased public safety and consumer confidence, and increased conservation. All things that would be good for wildlife and British Columbians alike.

While the DAO would be responsible for the delivery of the program, the provincial government would retain control over standards, legislation, regulations and policy, and how they are enforced.

The main advantages of a DAO are:

- empower groups or industry sectors to regulate themselves and resolve their own problems; and
- reduce the cost to government of enforcing current legislation.

The creation of a delegated authority would make guiding a registered profession, similar to realtors, insurance professionals, massage therapists, etc. The mandate would be to protect the public and environment by ensuring that outfitters and guides act ethically, with integrity and competence.

Conclusion

We appreciate the opportunity to submit our knowledge and ideas and look forward to positive change as a result of this engagement process.

We are happy to share this submission publicly, and wish to have our name included in the list of those who participated.