NOTE: Personal information has been redacted in accordance with Freedom of Information and Protection of Privacy Legislation.

July 30 2018

Email to: WildlifeAndHabitat@gov.bc.ca

Re: Wildlife and habitat engagement

To whom it may concern,

I very much appreciate the opportunity to provide input revolving around improving wildlife management and habitat conservation in British Columbia.

In the primer document Minister Donaldson states "The diversity of wildlife in British Columbia is one of our province's greatest treasures". I overwhelmingly agree with this statement. Unfortunately our fish, wildlife and habitat treasure has been eroded to a point of decline and in some cases hinging on extirpation. This being the direct result of lack of priority and political will put forth by the previous administration. With fault lying on the current government with its shift away from sound science based decision making, towards that of political interference in wildlife management to appease a popular urban perspective, often misinformed by bias special interest lobby efforts that focus on creating conflict with the underlining intent to profit from it.

If positive change is going to move forward to the benefit of BC's wildlife and habitat conservation, funding must be increased substantially, and lack of capacity addressed to effectively manage and protect British Columbia's revered wildlife resource. Sound science needs to be the foundation of the decision making process not politics, being paramount to sustainable wildlife and habitat management, and user group interests.

Advancing Reconciliation with Indigenous peoples

Input and collaboration with BC indigenous peoples plays an important role in moving forward to reduce conflict and effectively manage wildlife and habitat throughout BC. It's paramount that First Nations and Province recognize and entrench shared interests with residents of BC revolving around wildlife. After conservation and FSC needs, resident priority to access and harvest for food and social values must be clearly identified and managed for with the same regard, protection, and vigor as that of First Nations FSC interests.

Today many FN's have become directly involved in the guide outfitting industry that predominantly caters to non-resident hunters and anglers. There is concern amongst residents of BC and their rightful priority to access and harvest wildlife is being eroded through bias regulatory decisions often influenced by First Nations that have no impact on FSC, but in some cases favor non-resident and commercial interests at the expense, and erosion of BC resident opportunity and access to wildlife.

Like FN's, BC residents harvest from our wildlife resource for food, have done so for generations, and need to see this better identified, entrenched, and managed for. BC residents mirror and understand the social benefits and values our wildlife provides, and how it is the epicenter that fosters and nurtures many family and friendship bonds.

For reconciliation to advance effectively residents of BC must be assured that wildlife and their interest in it will not be a sacrificial pawn on the negotiation board to further political and commercial gain. Reconciliation with FN will only be successful through meaningful collaboration, not oppressing one group to benefit another based on race. A fear many BC residents have today.

Increasing Involvement and Shared Stewardship

It is important to seek the input of credible NGO's that have a stake in wildlife and habitat management in BC. That said any participating NGO needs to be vetted, credible, BC based, and have a history of participating in actual wildlife conservation work in the province, doing this will ensure the process will be successful, in the best interest of wildlife, and British Columbian's

Vetted NGO's must have a history of working for wildlife and habitat conservation in BC. It is paramount that NGO's who have used wildlife issues to create conflict through misinformation as a fundraising tool, with the focus being increasing donations must be filtered out.

Wildlife and habitat engagement intended to set policy and management direction moving forward in BC must be free of and protected from any foreign influence or profit driven lobby.

Declining Wildlife Populations

There's great concern with the current trend of declining wildlife populations in BC, some near extirpation.

Moving forward funding and capacity will need to be set at levels that allow for recurring inventory work to assess populations, habitat restoration, habitat protection, overall management needs, and enforcement to be effectively achieved and sustained throughout BC.

Any wildlife funding model or direction chosen needs must ensure funds are distributed throughout BC in an equitable manner for the benefit of wildlife, based on the size of land base being managed, rather than that of the human population of a surrounding area.

The decline in fish and wildlife populations in most cases can be linked back to political interference, history of funding and capacity shortfalls, influence of resource based industries, and industrial influence over the professional reliance model.

Oversight, checks, and balances have been eroded and diminished over the past 2 decades where wildlife and habitat are concerned. There's a need to conduct a review of this and implement or restore effective mechanisms that better monitor, manage, and protect wildlife values and habitat.

It is critical for any wildlife management strategy to be successful that the decision making process be based on sound science first and foremost.

Increasing Human Activity

The province must be cautious when assessing regulatory changes promoted by commercial or special interests groups under the guise of anecdotal information and or precautionary approach arguments. It is important to ensure when regulation are considered that they are supported by sound science, and not the function of one group making false claims in an effort to gain greater access and exclusivity over BC resident users.

The province needs to improve on assessing, identifying, and entrenching fish and wildlife values important to British Columbians, particularly those values revolving around consumptive and social use.

Many British Columbians have a history spanning generation of harvesting fish and wildlife in BC for food, a value that is important to many BC resident users, and has publics support. This important value is often undermined by managers, and not given the appropriate priority over non-resident and tourism users.

Two examples of this:

a) During the Steelhead Stream Classification Policy (SSCP) review it was requested that triggers be established to provide for a wild steelhead harvest opportunity when there's a biological surplus, and never materialized. This year steelhead returns in the Skeena are at record high levels, with no mechanism or opportunity provided to BC residents to sustainably harvest for food.
b) Changes made to the wildlife allocation policy have unjustly and negatively impacted residents of BC in favor of guided non-resident hunters. Using Skeena South moose allocation over the previous five year period, guide outfitters cumulatively were allocated 1500 moose of which they harvested 700, leaving 800 underutilized and unavailable to resident hunters to harvest for food.

Considering this it is felt that SSCP and Wildlife Harvest Allocation Policy requires open and transparent review and assessment by Ministry staff. The examples provided clearly diminish and erode BC resident priority in an effort to divert opportunity and cater to non-resident tourists. An unacceptable practice.

In regards to resource and commercial exploitation on the land base cumulative impacts are not properly identified and considered, if at all. A single project may have a negligible impact on a surrounding habitat, however when considering past, current, and new the cumulative impacts to fish and wildlife values can be devastating. Greater emphasis and consideration needs to be placed on the cumulative impacts on habitat, and fish and wildlife values.

Forestry practices need to be reviewed and the manner in which this industry conducts itself needs to better manage for and consider fish and wildlife values.

Tenure application process needs better interagency review by wildlife and habitat professionals. Often tenure applications get approved, are in critical wildlife habitat, and area wildlife managers were not advised being unable to provide input to mitigate potential issues.

Better Information

Better information revolving around wildlife and habitat is directly hinged on proper funding and capacity.

All resource based industries including eco-tourism need to contribute financially to wildlife and habitat management, preferable monies generated held outside of government. This could be achieved through a fee for every tree cut, ton of ore mined, unit of power generated, volume of LNG transported…

It is important that information generated is credible, science based, and free of political, industrial, First Nations, and commercial bias. Checks and balances need to be established that protect the credibility of the information being generated, is free of bias, credible, science based, and is defensible. This ultimately must represent sound wildlife management practices and resident publics' interests and values as government is entrusted to do.

Your time to consider my comments is much appreciated.

In conservation,

Michael