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Ministry of Forests, Lands, Natural Resource Operations and Rural Development
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Re: Public Feedback on Wildlife Management and Habitat Conservation

The North Columbia Environmental Society (NCES) offers the following input for the improvement of wildlife management and habitat conservation.

The NCES is located in Revelstoke in the middle of the Interior Rainforest where forest extraction and hydro-electric development have historically been the predominant landscape level impacts to the natural habitat of this area. More recently, tourism and backcountry recreation are also causing wildlife impacts and habitat change and this trend appears to be increasing.

To provide for the needs of wildlife and to protect habitat, we see the need for a major overhaul of the entire resource management system within the province. Specific areas that require modernization, together with our recommendations regarding the same, are set out below.

Forestry

The entire forest management system needs to be reviewed and modified. To protect wildlife and habitat, the priority of forest management must be wildlife, ecosystem, and habitat not fibre extraction for the benefit of large multi-national companies.

It has been demonstrated for decades, and now confirmed in the review and report on the professional reliance model, that relying upon employees of private forest companies to manage our public resource does not work due to the inherent conflict of interest. This has been recently demonstrated with such ambiguous management prescriptions as "results based" and "stewardship plans". The results have been huge

profits for corporations and irresponsible allocation and manipulation of definitions of wildlife habitat, winter range, riparian management, etc.

To manage adequately for the needs of habitat and wildlife, the entire Annual Allowable Cut (AAC) system and limits need to be overhauled, reduced, and managed to protect habitat as the number one priority. With mostly second and third generation forests now being cut, the volume- based harvest requires larger areas of forest to be cut to meet the current AAC volume. An area- based AAC would better manage for habitat needs.

Current resource land management is entirely focused on maximizing profits while minimizing all costs that do not directly achieve opportunities to harvest. Road management has been minimized to only facilitate timber extraction while erosion, siltation and unmanaged run-off occurs throughout the remainder of the year. Aquatic and wetland systems and their associated fish and wildlife values are being irreparably compromised.

Noxious weeds need to be managed to protect both the adjacent agricultural lands and the habitat values of the forests. Roadside weeds and entire cutblocks choked with invasive weeds all seem to be the normal and accepted practice while professional foresters make statements of how they are following their approved “stewardship plan” and government employees focus solely on the cutblock needs with such statements as “in three or four years the cutblock vegetation will outcompete the weeds”. There is inadequate consideration being given to manage the spread of weeds or to protect the needs of wildlife, habitat or agriculture.

The designation and spatial distribution of Old Growth Management Areas (OGMA) needs to be reviewed and improved upon. To allow forest companies to re-allocate OGMA as they see fit to maximize forest harvest is in direct conflict with the intent of OGMA.

In summary, the entire forest management system needs to return to a system of detailed and specific planning with public consultation and approval.

Crown Land Management

All crown land needs to be managed with a focus on a coordinated approach to protecting wildlife and habitat. The current practice of creating or funding NGO's to take on the role of wildlife or habitat management should be reviewed. Examples include Bear Aware and WildSafe BC being the leaders in human- bear management. Other

human and bear management in the province is virtually non-existent. The Invasive Species Council is tasked with noxious weed management while areas of government responsibility such as highway rights of ways, forestry roads/ cutblocks, and provincial parks are inadequately managed for weeds. The Freshwater Fisheries Society now has the task of managing all angling in BC. It is now being suggested that a similar model be established for wildlife.

While this model removes some of the bureaucratic nature of government, it also removes the government's responsibility to manage crown resources and limits the NGO's ability to effectively manage the resource due to the lack of decision-making authority, limited funding, and the additional bureaucratic reporting to government agencies. The government needs to be both responsible for the management of crown resources and also accountable to the people of the province. The current model lessens all accountability and responsibility while relying upon seasonal or junior level employees to take on the management of crown resources. Furthermore, this model effectively privatizes the management of the crown resource while removing accountability. The government needs to be directly responsible for all crown land management if wildlife and habitat are to be protected.

Reservoir Land Management

Lands within the drawdown zone of reservoirs form an important component of the seasonal habitat needs of wildlife within the valleys that exist in major hydro-electric developments with drawdown zones. Spring and early- winter drawdown provides for critical habitat for many species of wildlife that would have originally utilized these areas pre-reservoir development. Grasslands, shrub communities, and back-channel wetlands are some of the most productive seasonal habitats within these valleys, however these lands remain unmanaged and recreationally abused without regulation.

Land-based recreation and specifically unmanaged motorized recreation, unregulated camping, and general destructive party activities within these drawdown zones needs to be brought under strict management to protect the sensitive and critical habitats that exist within these drawdown zones. Where else in the province is it acceptable to cause such destruction of sensitive foreshore areas within water bodies? In the North Columbia region, these activities are in direct conflict with the critical habitat needs of spawning fish, migratory birds, ungulates, grizzly bears, and those of many listed species such as blue heron, western toad, painted turtle and bull trout. Specific management plans need to be developed and implemented for all reservoir drawdown zones.

Backcountry Recreation

Tourism and backcountry recreation is exploding throughout BC with little to no overall plan or foresight. Commercial backcountry recreation is somewhat regulated through tenure allocation, but there is little government oversight of these activities. Additional backcountry recreation is being developed by non-profit organizations and specific interest groups with little to no regulation, plan, or commitment to address long term impacts. The MoFLNRO&RD lacks the tools and staff to plan, manage and regulate such activities.

In the past, motorized recreation was largely limited to access on established forestry roads, however the advent of modern motorized recreation vehicles has allowed vehicle use in previously inaccessible areas. Whether it is snowmobiles, snow bikes, dirt bikes, quads or side-by-sides, there is scarce land remaining that is untracked by motorized vehicles. The alpine, wetlands, streams and other areas of critical habitat are being destroyed by motorized activities. Without regulation, control or limitations of use, the wildlife is being displaced, the habitat destroyed, and the ecosystems lost forever.

The frontier attitudes of the past need to change, the land needs to be recognized as more than just another hill to conquer without consideration for the needs of wildlife and protection of habitat. Backcountry recreation should occur as and where designated within a formal backcountry recreation plan that first and foremost considers the habitat conservation. Government staff need to proactively manage both commercial and public recreation and all crown land activities - not just timber extraction.

Non-motorized recreation also needs to be developed only after the needs of wildlife and protection of habitat are considered. The logic of putting up signs at newly developed mountain bike trail heads warning riders of the fact they are in grizzly bear country does nothing to help protect this sensitive species from disturbance and displacement. Such signs suggest these trails are being built in the wrong places. The lack of public consultation, habitat assessment and master planning of backcountry recreation is destroying many critical habitat areas.

Mountain biking has developed from a sport of riding along established trails to one of extreme challenge and riding locations, increasingly facilitated by helicopter use for access purposes. Alpine slopes are being used without regard for the sensitive vegetation, subsequent erosion and displacement of wildlife. This sport can be extremely destructive to the environment with erosion ruts established in steep vegetated mountain areas. These ruts will cause spring snow melt in the Interior

Wet-Belt to create massive erosion events and irreversible damage to the landscape with loss of alpine vegetation, destruction of habitat, and siltation of streams. Invasive species and noxious weeds quickly establish in such impacted areas. Grizzly bears and mountain goats are being driven from their habitats. Downstream rivers are experiencing erosion and siltation caused by the increased runoff and torn-up vegetation. Aquatic habitats are experiences associated impacts.

The future of wildlife and their habitat is dependent upon the development of backcountry recreation plans in advance of all new backcountry recreation. The past concept that all crown land is open to all public use needs to be reconsidered if wildlife and habitat are to be protected. Crown land use, be it commercial, recreational, or simply human access must all be re-evaluated if wildlife and habitat are to remain intact and exist in viable numbers in this province. People management is the key to wildlife management.

Wildlife Management

In the past, wildlife management has been mostly about hunter opportunity even though the provincial mandate is to provide viewing opportunities as a priority. Viewing opportunities are seldom a managed prescription for wildlife management, backcountry recreation or forestry. We have watched over the past few decades as opportunities such as grizzly bear viewing, mountain goat viewing and bird watching have been lost without recognition by government agencies of the fact that their decisions to allow hunting, snowmobiling, motorized recreation and access development have all impacted on this opportunity.

Hunting regulations have been generalized to the point of non-existence. There needs to be more detailed understanding of specific populations with associated management to protect sensitive or isolated populations from over-harvest or loss caused by other activities such as recreation and forest harvesting.

Wildlife management has essentially become an exercise in crisis management, meaning it has basically diminished to the point where efforts are only put into management after a species becomes listed. The formula is mostly too little, too late as we are currently experiencing with the loss of caribou and their habitat. After studying caribou for close to four decades with business as usual for the forest sector, the current extreme efforts are knowingly inadequate and the future of this animal is inevitably cast in stone. Will the government conduct studies and do nothing else until

mountain goats, grizzlies, wolverine and mule deer are also in the same dire state of mountain caribou?

The economics of tourism, recreation, and forest extraction should not trump the habitat needs of wildlife. Such short-sighted management will ultimately cause all wildlife to be managed to the lowest possible number. The economics of strong wildlife populations should be considered as the foundation for all backcountry tourism.

Over the past decades, wildlife management (or miss-management) has resulted in huge wildlife population swings. How is it that management prescriptions can cause species such as elk in the Kootenay, moose in the Cariboo, and now mule deer throughout the province to become of concern? Obviously the model of managing species for hunting opportunities has not worked in the past and the current concerns for these species suggests a different model is needed to protect these species. If these species can't be managed in a sustainable manner, what hope is there for many of the currently listed species? The reluctance to manage for the needs of wildlife and habitat instead of hunting opportunity with its associated economic value needs to be reconsidered.

Science Based Decision Making

Science based decision making has been touted as the only way to properly manage wildlife and yet most wildlife species in the province are not faring well. The model needs reconsideration such that, starting immediately, a more precautionary approach is taken.

It was pressure from local hunting groups that put an end to caribou hunting in the North Columbia region while government employees stated that based on science the existing harvest at the time was sustainable. Unfortunately, the past science- based decisions for caribou management have created the current situation. It was science- based decisions that kept the grizzly hunt open until last year with continued science based proclamations that the hunt was sustainable while local populations were disappearing and total provincial ranges were shrinking. It was political pressure that stopped the hunt, not science.

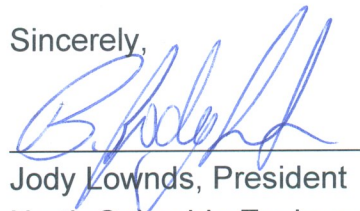
Science needs to be used as a tool, not as a decision maker. The past practice of studying everything for decades while it is business as usual for the human activities that are impacting upon wildlife and habitat needs to change. Implementing better management practices using current knowledge should occur first, then science should

be used to monitor results and help to improve outcomes. Finally, where the scientific information available does not provide a clear answer, the precautionary principle must be applied to ensure no irreparable harm is done to a wildlife population or habitat area.

Summary

The NCES believes that the success to wildlife and habitat management is in the management of other forest resource use and backcountry recreation. Managing people is the key to successfully protecting wildlife and their habitats. Thank you for considering our submission to this important and overdue need.

Sincerely,



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