

July 31, 2018

On behalf of the clubs and their members of the Peace-Liard Wildlife Association (Region 7B of the BC Wildlife Federation), I would like to express our appreciation for the opportunity to provide feedback on the discussion paper on British Columbia's wildlife and habitat.

Challenge 1: Advancing Reconciliation with Indigenous peoples

Over the last few months, government has announced a series of initiatives with First Nations concerning Recognition and Reconciliation, as directed through the 2017 mandate letters to Ministers where government will be fully adopting and implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the Calls to Action of the Truth and Reconciliation Commission. More recently government has adopted Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples. This is, of course, a long overdue responsibility of government that the Peace-Liard Wildlife Association supports.

The Peace-Liard Wildlife Association (P-LWA), other stakeholders and the public are often involved only after negotiations are well advanced, which results in poor decisions and escalating tensions between non-Indigenous and Indigenous peoples. Non-Indigenous interests should be involved in the development of management plans that affect their interests; this involvement is required for true reconciliation and recognition. A case in point is the Peace-Liard Moose Management Plan where we became involved late in the process. Our members often remind us that it is the Government of BC's responsibility to represent all interests in fish and wildlife, especially when stakeholders are not represented at the table. After food, social and ceremonial use, there must be a guarantee of fish and wildlife for use by BC residents assuming of course that there is no conservation concern.

Treaty Land Entitlement, Tripartite Land Agreements, Incremental Treaty Agreements and Impact Benefit Agreements in the Peace-Liard region have been a concern because of the potential to restrict access to lands that are currently being used by hunters and anglers as well as recreational users.

The P-LWA appreciates the recent efforts of government to open up these processes to public and stakeholder engagement. Consultation with stakeholders and the public in an open and transparent process that will address concerns in a defensible and fair manner remains a concern with our members.

Recommendation: The Peace-Liard Wildlife Association would like to see government facilitate and financially support a roundtable approach to wildlife and habitat management for the Peace-Liard similar to the Northern Wildlife Roundtable in the North Skeena region where stakeholders and First Nations are involved.

Challenge 2: Increasing Involvement and Shared Stewardship

Recommendation: The Peace-Liard Wildlife Association supports a roundtable approach, similar to the current Mountain Caribou Recovery Implementation Plan where legitimate interests are represented. A roundtable would include First Nations, NGOs, experts, scientists, the public sector and industry. Represented interests should be BC-based, be provincial in nature and non-governmental organizations should be involved in on-the-ground conservation and stewardship

projects. The roundtable would add to the legitimacy of the process and minimize free-riding, mistrust and instability.

Challenge 3: Declining Wildlife Populations

There are currently no meaningful objectives for wildlife in BC. For the most part, wildlife managers manage wildlife via sex ratios, such as the number of bucks:100 does. Wildlife populations are affected principally by adult female and juvenile survival rates, and there are no objectives for these two components of the population. The result is a long-term decline in wildlife populations, which ensure only that sex ratios are managed via hunting regulations.

Recommendation: Legislated objectives for fish, wildlife and habitat, which are included and balanced with development and other relevant pieces of legislation. These objectives should include population density objectives for predators such as wolves and grizzly bears.

Challenge 4: Increasing Human Activity

The impacts of resource extraction, and other industrial and commercial activities are often considered by the individual project and/or tenure as one-off distinct impacts. This is a gross oversight in any decision making process as one operation may have a small impact when considered alone, but when other operations are considered, the cumulative impacts are often negative and overwhelming. Mega projects like the Site C dam and the miles of roads from oil and gas and forestry activity are undoubtedly large contributors to the decline in wildlife in the area. The approximately 13,000 moose lost when Williston Lake was created have never been replaced through compensation programs. The Peace-Liard Wildlife Association supports sustainable land-use activities that also result in sustainable fish and wildlife populations and the habitats they live in. When making decisions, the impacts on stakeholders such as members of the Peace-Liard Wildlife Association must also be considered.

Where warranted, the Peace-Liard Wildlife Association supports protected areas as a means for ensuring long-term habitat viability and the health of fish and wildlife that are socially important to First Nations and resident British Columbians.

The Peace-Liard Wildlife Association has heard from regional FLNRORD staff that they have been in discussions with First Nations and forest tenure holders around “beneficial moose practices” — the P-LWA would like to be involved in those discussions. We see this as a very positive initiative.

Recommendation: A Plan for wildlife and habitat management must entrench the many social, traditional, and heritage values of First Nations and resident British Columbians while keeping the sustainability of wildlife and their habitats in the forefront. The discussions around “beneficial moose practices” should be expanded to include the oil and gas industry and should consider the impacts on elk and deer as well. The current structuring of the ministries responsible for wildlife and habitat sustainability seems to be broken — the appropriate agencies should be housed in one Ministry, with budgeting, line-of-sight authority, legislation, regulation and policy flowing via the respective agency.

Challenge 5: Wildfires and Extreme Weather

The Peace-Liard Wildlife Association agrees that the “opportunities” listed on the engagement website under this topic are priorities. The recent lack of prescribed fire for wildlife in the Peace-Liard region is a concern, especially in light of previous decades of consistent use of fire for ecosystem restoration and enhancement and the resulting benefits. The lack of CWD related data from the Peace region is another concern. We support the recent initiative by FLNRORD to increase capacity around education and data collection related to CWD in the Peace area of the region.

Recommendations: FLNRORD should continue to monitor the Peace area for CWD. The prescribed burn plan for the region needs to be finalized and adopted, and government needs to work with First Nations, stakeholders, and the Habitat Conservation Trust Foundation to bring fire back as an important wildlife and habitat management tool in the region.

Challenge 6: Better Information

Monitoring and Inventory

Monitoring and inventory work in BC is underwhelming as a result of lack of funding and staffing capacity. BC has relied on “dead side data” for most species for over 40 years, with no long-term ground-truthing. In many cases, the models to monitor and inventory wildlife have not even been developed in BC

Recommendation: BC needs spatial and temporal plans which ensure wildlife health, and that abundance is tracked via traditional knowledge, science and citizen science. The initiative needs to be supported by increased staffing in government and the use of NGO scientists and be funded at an appropriate level.

Reporting

A focus on hunting trends, dead-side data, reporting and record keeping is another important component of wildlife management, which is currently lacking.

Recommendation: Create a reporting system which tracks hunting trends and dead side data (road kills, rail kills inclusive). This must include all hunters (regulated and unregulated) and industries.

Challenge 7: Human-Wildlife Conflicts

The Peace-Liard region has significant wildlife conflicts with the agriculture sector mainly because of crop and forage loss and degradation. The region also has significant loss of wildlife to vehicle collisions, especially on the Alaska Highway, but also on resource roads.

Recommendations: FLNRORD, along with the Ministry of Agriculture and other appropriate ministries and agencies, should investigate appropriate compensation for wildlife damage to land and tenure holders that also consider wildlife and habitat stewardship. The Ministry of Transportation, along with industrial users and highways contractors, needs to be more proactive in keeping records and finding solutions related to vehicle collisions with wildlife.

Challenge 8: Funding

The BC Wildlife Federation's submission on this topic pretty much says it all — there is a severe underfunding of the wildlife and habitat branch in comparison to comparable jurisdictions in northeastern North America. The Fish and Wildlife Compensation Program associated with hydroelectric projects in the Peace-Liard is underfunded and has done little to replace the animals and habitat lost to hydro activity.

Recommendations: The Peace-Liard Wildlife Association recommends that the Government of BC show leadership by placing a priority on wildlife and their habitats, and by increasing funding to the related government agencies. Funding needs to be placed at arm's length from government to increase transparency, public confidence and the ability to leverage funding from other sources. Government should work with the public and stakeholders to find other creative ways to secure funding. Some suggestions are:

- Require all who use and benefit from our natural resources to give back to conservation, including but not limited to: hydro-electrical development, rail, heli-skiing, ski hills, logging, mining, oil & gas, ecotourism, hunters, anglers and naturalists.
- A wildlife license plate, similar to the BC Parks license plate, will create additional, incremental funds.
- Research into the feasibility of a national Pittman Robertson-like tax, or redirection of existing tax, on outdoor goods.

Additional Questions

The Peace-Liard Wildlife Federation supports the North American Model of Wildlife Conservation (NAMWC) — we encourage government to do the same. The tenets of the NAMWC support the traditional concepts of consumptive and non-consumptive use of wildlife and apply to the public, stakeholders and industry equally.

The P-LWA supports the recommendations in Auditor General Carol Bellringer's report *An Independent Audit of Grizzly Bear Management* and finds that many of the recommendations in the report apply to all wildlife in the province.

The P-LWA supports the recommendations of Al Gorley in his report *A Strategy To Help Restore Moose Populations In British Columbia*. We recommend that government fully adopt and implement all the recommendations in the report including predator management.

The P-LWA suggests that government support a Canadian Chair in Wildlife and Habitat at one of BC's universities and include that chair and other academics in roundtable discussions.

Conclusion

The Peace-Liard Wildlife Association is looking forward to seeing the summary of the public and First Nations engagement around BC's wildlife and their habitats and is hopeful that the deliberations will lead to a bright future for generations to come.

Yours in Conservation,



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