wildsight

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Wildsight welcomes the opportunity to provide input into a renewed wildlife management strategy for British Columbia. Wildlife populations in the Kootenay region and across the province are in a general state of decline. Urgent action is required. While the present consultations will hopefully lead to real change, concrete actions must be taken now to address population declines. Wildlife habitat continues to be lost as discussions carry on.

Cumulative effects from industry and recreation have lead to degraded ecosystems that are failing to maintain wildlife habitat and healthy populations. Society's impact on wildlife and the habitat they rely on is continuing to increase, putting ecosystem health and function at severe risk. Underfunding wildlife and habitat personnel within Forest Lands And Natural Resource Operations and Rural Development (FLNRORD) and the Ministry of Environment and Climate Change (MOECC) has lead to outdated inventories and half measures. Our present legislation (FRPA, Mines Act, Environmental Assessment Act, Land Act, Private Managed Forest Land Act) repeatedly allows for decision making that sacrifices wildlife. Government must make wildlife a priority in land use decisions. This will require both legislative and policy changes and investment in staff,empowering them to bring about real changes in wildlife and habitat management.

The government of British Columbia must recognize our province's biodiversity as a natural resource and provide a legal mandate for it to have full and equal consideration in the planning, development and extraction of our natural resources.

Key Recommendations:

- Legislative change is necessary to ensure that wildlife and habitat objectives are not secondary to resource extraction or recreational uses. Present legislation has failed to maintain sufficient wildlife habitat and is leading to its further erosion. Available tools are not being used effectively.
- Clear and measurable objectives must be established for both wildlife and habitat with a legal mandate to implement actions to achieve them. Objectives must be monitored and accompanied by required actions and enforcement.
- Landscape level habitat protection should be a top priority. Intact landscapes must be protected and connected in order to maintain healthy and fully functioning ecosystems. Access management systems including reductions in road densities and enforceable access management designations should be utilized. Core habitats and movement corridors need legislated protection.
- Road densities must be reduced. Objectives must be set for all landscape units and required by regulation to be met.

- The appraisal system must incentivize minimizing and elimination of roads.
- Additional Wildlife Management Areas should be fully implemented and supported by road closures and deactivation.
- While prioritizing landscape level management, actions must be implemented to address specific declining and threatened species.
- Target treatments for species in decline should consider species' life requirements and address appropriate habitat rehabilitation and maintenance.
- Hunting regulations must put healthy wildlife populations first. "Maximizing hunter opportunity" has lead to mismanagement and population declines.
- Predators are key to healthy wildlife populations. Wildlife should be managed for a healthy predator/prey dynamic.
- Regulations should be based on regional considerations. BC is far too diverse for one size fits all regulation.
- Managers need to utilize local and traditional knowledge of landscapes, wildlife, and habitat. Local knowledge is critical in ground truthing, understanding wildlife movements and prioritizing protections.
- Effective wildlife management requires robust datasets to support wildlife objectives and management plans.
- Legislation must safeguard habitat on private land and incentivize private land stewardship.
- Natural resource permitting should require sign off by qualified government staff empowered to act on the basis of wildlife and habitat objectives.
- Appropriate levels of Wildlife and Habitat staffing are required to assure wildlife and habitat objectives are a priority in land use decisions.

Biodiversity: A Critical Natural Resource

The government of British Columbia must recognize our province's biodiversity as a natural resource and provide it with full and equal consideration in the planning, development and extraction of our natural resources. Both the intrinsic and extrinsic value of wildlife and biodiversity must be considered in all stages of natural resource, recreation and land use planning and development.

Wildlife and wildlife habitat, just like softwood lumber or any other natural resource, have a major economic value that has yet to be evaluated or considered in resource planning and development by the provincial government. This is in addition to the intrinsic and environmental value of wildlife and wildlife habitat.

Protecting Landscapes and Habitat

British Columbia needs to protect intact landscapes and make sure there is connectivity throughout large landscapes in order to ensure healthy and fully functioning ecosystems. Intact landscapes have become core or anchoring areas for our wildlife populations and

these core areas must be protected and connected so wildlife can freely roam between areas of secure habitat.

Utilizing Local and Traditional Knowledge

At the local level, managers need to utilize local knowledge of landscapes, wildlife and habitat. Many guide outfitters, conservationists and First Nations across the province have decades of intimate knowledge of their home area. These individuals' knowledge will enhance the ability of government to assess habitat, wildlife populations and landscape level changes and impacts associated to resource development and natural disturbances. Although government driven algorithms and biophysical mapping for wildlife habitats such as UWR may be a step in the right direction at the landscape level, local and traditional knowledge is critical in ground truthing, understanding wildlife movements, prioritizing protections, and should be fully considered and utilized by decision makers. Wildlife regulations should be based on regional conditions. Province wide regulation fails to address the habitat needs of wildlife that vary across the province.

Wildlife Management: Changes to Legislation Needed

Meaningful wildlife management will require changes to policy and legislation considering wildlife and habitat as a priority. The "results based" Forest and Range Practices Act, the Land Act, the Environmental Assessment Act, and the Private Managed Forest Land Act may need significant changes in order to allow for adequate management for the health and function of wildlife populations and ecosystems. Nebulous and ambiguous terms are prevalent throughout much of the current legislation, particularly within FRPA. As outlined by Mike Morris in his 2015 report, specific language and vague terms have "contributed to a degradation of biodiversity and ultimately, a reduced ability for professionals to meet the spirit and intent of the legislation" (Morris 2015). The recent Independent report on Professional reliance further illustrated major legislative gaps within wildlife and land management across the province. The reports recommendations need to be fully implemented by government.

Government objectives for wildlife populations and habitat

We need clear objectives and management plans that are sustainable, effectively monitored and enforced. Wildlife management continues to lack basic inventories for the vast majority of wildlife species across the province. A comprehensive wildlife inventory program for at least indicator species should be developed. Population and habitat objectives need development and need to be set on regional basis. Adequate wildlife management will require robust datasets gathered to support wildlife objectives and regional management plans.

Cumulative effects

Cumulative effects management will define the future health of our ecosystems and wildlife populations across the province. We are at a tipping point for our ecosystems. Road densities and ECA's are far too high to support the long term persistence of sensitive species in many parts of the province. Many of the current issues and cumulative impacts on our wildlife populations will/and are being further impacted by climate change. A precautionary management approach to resource management is needed in this time of unknown as we brace for the significant impacts that climate change will have on our ecosystems. Locally, the current Cumulative Effects Management Framework in the Elk Valley is producing scientific management recommendations and modelling that needs to be meaningfully adopted and implemented by government, industry, and regional managers.

Road Density: Objectives, Appraisals and Wildlife Management Areas

Roads remain one of the largest impacts for wildlife species across the province. Impacts to wildlife species typically include some combination habitat loss, degradation, fragmentation and/or direct mortality from collisions with vehicles, increased hunting pressure or use of the road by predators (Forest Practices Board 2015). The preferred conservation strategy is to reduce road density drastically for the benefit and long term persistence of sensitive species of management concern. Full removal and restoration of roads in and into core wildlife habitat needs to take place immediately to sustain wildlife populations. Objectives for road densities within each landscape unit should be established and enforced by regulation.

The forest industry is responsible for the vast majority of resource roads across the province (Forest Practices Board 2015). Provincial changes to the appraisal system are necessary to incentivise forest companies to build fewer roads, fully debuild and get rid of roads. Road density would significantly be reduced along with significant access issues associated with British Columbia's road network through changes to the appraisal system. Debuilding and fully decommissioning roads should be factored into the cost system in a similar way as road building is at present.

Restricting access and recreational activities through legally-enforced and monitored Wildlife Management Areas must be expanded. Implementing access closures paired with reducing road density would significantly reduce adverse effects to wildlife populations.

Wildlife management efforts must include dedicated funding to implement reduced road densities and access management strategies that protect wildlife populations and the health of our ecosystem.

Wildlife Conservation On Private Land: Incentivizing Private Landowners to Safeguard Wildlife Habitat

In order to fully address wildlife habitat, cumulative effects, and species at Risk, British Columbia must safeguard habitat and incentivize private land stewardship. Although only 6 percent of BC is private land, much of that land is valley bottom or riparian habitat. Private lands provide important habitat for nearly half of the federally listed species at risk in British Columbia (Environment Canada 2012). Quebec's Natural Conservation Land Act provides a good blueprint for incentivizing private landowners to partner with government and non-profit conservation organizations to manage and safeguard wildlife habitat, species at risk, and ensure the health and long term function of their property.

Another mechanism for private land conservation could be developing a Conservation Legacy Fund for Private Land Conservation. Industrial users, adventure tourism tenure holders, and/or consumptive recreational users could pay a small fee similar to HCTF fees on hunting licenses in order to establish a major fund dedicated to securing and stewarding private lands in BC.

A key issue to be looked at within this framework is the Private Managed Forest Land Act. The Act applies to over 821,000 ha of Managed Forest across the province. The Act and management regime currently supports the short term liquidation of forests. There are no clear legal requirements to maintain wildlife habitat or safeguard species of management concern. These lands can easily be taken out of Managed Forest status and developed. Major revisions of the Private Managed Forest Land Act are required in order to maintain wildlife habitat and water quality.

The Act includes no legal requirements for operations to be sustainable over time. High cut levels and overharvesting that impact biodiversity are common for large operators (>1000 ha). Managed forests represent less than one percent of the provincial landbase (0.8 percent of total land/1.4 percent of forested land base), however timber harvest on managed forests disproportionally represents approximately seven percent of the total timber harvest in the province based on 2015 harvest data from the province and the Managed Forest Council. Regional overharvests on private managed forest are even more drastic as managed forest land is primarily concentrated on Vancouver Island, in the the Kootenay region, and on the South Coast. Amending the Private Managed Forest Land act to include provisions for a calculated annual allowable sustainable cut, clear and enforceable wildlife habitat objectives, and riparian protections would significantly benefit wildlife recovery across the province.

References

Environment Canada. 2012. *Species At Risk On Private Land in British Columbia.*

Morris, Mike. 2015. *Getting the Balance Right: Improving Wildlife Habitat Management In BC*. Prepared For The Minister Of Forest Lands Natural Resource Operations.