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Via email: WildlifeAndHabitat@gov.bc.ca

The Honourable Doug Donaldson,
Ministry of Forests, Lands, Natural Resource
Operations and Rural Development
PO Box 9049, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Donaldson:

Re: TOGETHER FOR WILDLIFE A Proposed Pathway for Improving Wildlife Management and Habitat Conservation in British Columbia

The Forest Practices Board is pleased to provide a submission to Together for Wildlife. At the outset, we wish to recognize the importance of having a long-term vision and plan for stewardship of BC's wildlife resources, and the importance of this initiative.

This submission draws from reports and investigations the Board has undertaken over almost 25 years. The Board recognizes that the scope of wildlife management is vast and many aspects of wildlife management (such as harvest regulation) are beyond the mandate and experience of the Board; this submission focusses on the areas where there is a strong relationship between forest and range practices and wildlife management.

The draft strategy appears comprehensive and addresses the main themes the Board has identified in the past regarding wildlife and forest and range practices:

- setting clear objectives,
- having good information including monitoring,
- improved public participation, and
- having processes to evaluate implementation effectiveness of plans and legal objectives.

Below, we highlight areas of the draft strategy where the Board has previously undertaken work and where our recommendations could inform the completion and implementation of this strategy.

Together for Wildlife. Goal 2 – Informing Stewardship: Management Driven By Data, Information & Knowledge

- Starting in 2020, expand biological, social and economic data collection.

Board Comments: The Board strongly endorses efforts to improve the availability and reliability of monitoring and evaluation information in BC. In our 2017 Special Report on the Forest and Range Evaluation Program, we made several recommendations for improving monitoring.¹ Specifically, we would focus attention on the need for completion of protocols for wildlife, wildlife habitat, landscape level biodiversity, SAR and listed plant communities, and implementation of these protocols across the province. We recognize that there will be other areas where improved monitoring and science are also valuable (e.g., population inventories) and believe that improved effectiveness monitoring across all resource values is critical to the future of resource management in BC.

Together for Wildlife Goal 3 – Delivering Stewardship: Achieving Tangible Results

- Establish clear, measurable objectives for wildlife stewardship.

Board comments: The Board supports initiatives that provide clear objectives for natural resource management in BC. In many instances, existing objectives are ambiguous or unmeasurable and many important social choice decisions are left to individual professionals to interpret. In setting objectives for wildlife resources, it is critical that they be consistent with, and linked to, objectives for other resource values (such as timber, water, range, fire management) and land users (i.e., common objectives for all land users). The processes used to establish objectives for wildlife and habitat should not be siloed. The Board has recently called for tactical planning for forestry in BC.² We would encourage the integration of these new wildlife objectives with tactical (or landscape level) planning that is anticipated to be incorporated into the *Forest and Range Practices Act*.

Together for Wildlife. Goal 3 – Delivering Stewardship: Achieving Tangible Results

- Starting in 2020, make investments to leverage other funding opportunities (e.g., Forest Carbon Initiative, Habitat Conservation Trust Foundation, Fish and Wildlife Compensation programs) for on the ground actions to meet wildlife objectives and increase priority wildlife populations.

Board Comments: In our previous work we have identified specific areas where additional investments should be considered:

- Roads. There is a large and growing network of resource roads and some of those roads are having negative impacts. Fish and wildlife habitats are often negatively affected by roads, but even if there is a willingness to deactivate roads that are problematic or no

¹ <https://www.bcfpb.ca/wp-content/uploads/2017/11/SR54-Forest-Range-Evaluation-Program.pdf>.

² <https://www.bcfpb.ca/wp-content/uploads/2019/07/SR58-Tactical-Forest-Planning.pdf>

longer required, there is usually no funding available. See our Special Report, *Access Management and Resource Roads: 2015 Update*.³

- Fuel Management and Ecosystem Restoration. As noted in our 2016 report on forest fuel management, there is a large need to undertake fuel management treatments to reduce wildfire hazard in BC.⁴ Many of these treatments are focussed on returning stands to a state that is more consistent with their historic ecosystem function. Treatments in these areas to restore ecosystem function can have significant long term benefits for wildlife. Please refer to our report on East Kootenay Grasslands for an example.⁵

Together for Wildlife: Goal 3 – Delivering Stewardship: Achieving Tangible Results

- By 2021, complete a comprehensive review of land designations under the *Land Act*, *Wildlife Act*, *Oil and Gas Activities Act*, and *Forest and Range Practices Act* that contribute to conservation to ensure they effectively target the intended habitat now and in the future.

Board Comments: This kind of assessment is long overdue. Despite more than two decades of work to establish various legal objectives, there has been little review to ensure they are accomplishing what they were set out to achieve. In our 2012 report, *Conserving Old Growth Forests in BC*,⁶ the Board makes several recommendations that remain relevant. In addition, our recent report on Conserving Fish Habitats under FRPA⁷ identifies areas for improvement in legal designations for fish habitat.

In addition to examining land designations under various statutes, the Board encourages government to include a review of species designations. Our past work examining wildlife issues under FRPA suggests that the designation of species at risk has not been updated for over 14 years and there remains considerable confusion between designations set by programs, such as the Conservation Data Centre and COSEWIC, and various statutes including the *Wildlife Act*, FRPA, and the federal *Species at Risk Act*.

In addition to our past reports, this year we will complete a comprehensive examination of Species at risk management for Northern Goshawks; we anticipate that this report will shed light on strengths and weaknesses of current designations and management approaches.

I hope our input assists in the evolution and implementation of this strategy.

Sincerely yours,



Kevin Kriese

Chair

³ <https://www.bcfpb.ca/wp-content/uploads/2015/04/SR49-Access-Management-2015-Update.pdf>

⁴ <https://www.bcfpb.ca/wp-content/uploads/2016/04/SIR43-Fuel-Management-Update.pdf>

⁵ <https://www.bcfpb.ca/wp-content/uploads/2016/12/SR53-Rangeland-East-Kootenay.pdf>

⁶ <https://www.bcfpb.ca/wp-content/uploads/2016/05/SIR36-OGMAs.pdf>

⁷ <https://www.bcfpb.ca/wp-content/uploads/2018/07/SR56-Fish-Habitat-Conservation.pdf>