East Kootenay Wildlife Association "East Kootenay Region – BC Wildlife Federation" Box 1324 Fernie B.C. VOB 1MO





January 9, 2020

Doug Donaldson (Minister of Forests, Lands, Natural Resource Operations and Rural Development

Re: Together for Wildlife Strategy (Draft)

Mr. Donaldson, et al,

Firstly, please recognize our appreciation for your department's recognition of the fact that the wildlife in this province is at a critical stage of demise and is drastically in need of improved management.

Your initiative to work together with stakeholders and FN is reassuring and we sincerely hope that the efforts invested in working with your department in the framing of this strategy will not be overlooked or considered invalid. In the past, with previously proposed management plans, the input of stakeholders has been collected and then simply shelved and never implemented; surely that can not happen with this extremely crucial opportunity to move the needle forward.

Our comments on the draft version of the strategy follow:

We are extremely concerned that the strategy proposed does not address a funding model that involves all users that have an interest and impact on wildlife and in particular, their habitat. This is fundamentally critical and must include the extensive list of all sectors such as mountain bikers, e-bikers, and eco-tourism, forestry, mining, and not just the current group of anglers and hunters. You have invited these users to participate in this Together for Wildlife strategy yet there exist no demands on them to contribute financially; with the lack of sufficient funding from the government, this has to change!

Regarding this funding strategy, we hope that you can agree that it should be independent of the government. If stakeholders and users can have a part of the management decision-making process and spending then there will exist inherent ownership and thereby further support. We also strongly recommend that the majority of funding be directed to the science and evidence-based landscape actions that treat causes and actually produce results.

This independent of government model, of course, does not negate the fact that the government needs to drastically increase funding and resources for wildlife and habitat. In comparison to areas as small as Idaho, it is absolutely appalling how little is dedicated to the management of wildlife in this province.

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Furthermore, we could not find a mention of any independent oversight moving forward. With all due respect to Professional Reliance, we are concerned that without an understanding of the intended governance of this strategy that this may well become another government 'shelf-document'.

Also, absent in the document is any indication as to how this proposed strategy will tie in with your existing policies and guidelines such as the Cumulative Effects Management Frameworks or the Environmental Mitigation Policy and Procedures as examples. Clarification on this would be very beneficial to all stakeholders involved.

To our dismay, it appears that any work on the identified objectives doesn't start for years. In our opinion, this is a huge mistake and appears to be political in design in that the timeline coincides with the next election. The wildlife in this province can not wait 3 or 4 years; we need to act now!

In addition to the timeline urgency facing our wildlife, due to the nature of our government system, the election outcome doesn't guarantee that the policies of the current government will remain in place; regardless of how effective they may be. To alleviate that concern, this new wildlife strategy needs to address binding legislating objectives for wildlife and habitat management.

In closing, again, we do appreciate the opportunity to partake in this process and truly hope for a productive strategy as a combined result of your efforts and willingness to instill the feedback from stakeholders and to implement the strategy sooner than later.

Sincerely,

Glenn Flynn EKWA President

Cc:

Chris Hamilton (Director of Strategic Projects, and Indigenous Policy - FLNROD) Jennifer Psyllakis (Director of Wildlife and Habitat - FLNROD)

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