



# COMMITTEE REPORTS

QUARTER 4



## **Q4 REPORT, 2019 ACCESS COMMITTEE**

**Region 2:** The Bridal Falls Gondola Corp. has applied to increase the size of their tenure for the Bridal Falls Gondola by another +/- 29.19 ha.

To local governments and stakeholders in the Sunshine Coast and Chilliwack Natural Resource Districts:

The Ministry of Forests, Lands, Natural Resource Operations and Rural Development (the Ministry) is reminding all recreational users of Crown land that authorization under the *Land Act* is required to use Crown land for business purposes such as guiding or tours. Commercial recreation and tourism enterprises are managed under the Ministry's Adventure Tourism Policy.

Please see attached letter that is with this report (**Appendix 1 - page 16**)

**Region 3:** The 2 main issues in Region 3 are access to Paul Lake for trailered boats through the Paul Lake Provincial Park and the Minnie/Stoney lakes court/appeal process with Douglas Lake Ranch and Nicola Valley Fish & Game Club.

The Kamloops and District Fish & Game Association (KDFGA) working in partnership with the Kamloops Fly Fishers Club (KFF) is undertaking efforts to have a trailered boat launch provided at Paul Lake. The B.C. Parks Branch only provides a car top boat launch at this lake at the present time. This provincial park policy creates significant challenges for senior citizens and physically challenged or disabled people to launch their fishing boats into the lake. The KDFGA and KFF have submitted a proposal to the B.C. Parks Branch that would allow for the provision of a trailered boat launch and address environmental and safety concerns identified by Parks staff.

The proposal as submitted to B.C. Parks has been rejected by Parks staff to date. The KDFGA and KFF have met with federal Conservative MP Cathy McLeod and, acting upon her recommendation, have submitted a formal complaint to the B.C. Human Rights Commission. The formal complaint states that non provision of a trailered boat launch by the provincial parks branch is discrimination against senior citizens and physically challenged and disabled individuals who wish to launch their fishing boats into the waters of Paul Lake. The KDFGA and KFF are awaiting word from the Commission as to whether this complaint will be formally reviewed by the Commission's tribunal. Other actions are also being considered to address this 'access' issue to the waters of Paul Lake. '

The Outdoor Recreation Council of BC (ORC) applied for intervener status and at the of November was granted intervener status in the appeal case involving Douglas Lake Cattle Company vs. Nicola Lake Fish & Game Club.

Douglas Lake Cattle Company (BC's largest private landowner) is seeking an order declaring there is no public access to Stoney Lake and that access to Minnie Lake is only by way of Wasley Creek. Underlying the appeal are fundamental questions about public access to public lands, such as lakes, that are enclosed by private property.

The appeal is scheduled for March 30-31, 2020, so we'll now begin to work with our lawyer to build the argument for the public's right to access crown lands and waters in BC.

## **Region 4W:**

1) Deactivation without any consultation.

2) Deactivation over done. Tank traps being created creating a safety hazard for back country users.

When accessible by ATV only has been discussed with the Ministry and another meeting is being arrange with Recreation section.

3) Number of Commercial back country tenures increasing without Land use plan.

There are a Number of applications which once approved are amended to include more area to make them viable and also change the tenure from seasonal to all season Eg Back country cat skiing amended to include trekking with cabins, more area, Heli skiing and mountain biking.

4) Culmulative Impacts Tenures starting to adjoin each other so culmulative impacts becoming more critical.

5) Target population or client on Back country tenures Non-resident.

Many operators will tell you target client is non-residents from the area as locals can not afford the service.

One back country ski tenure has developed an agreement for exclusive use to make it viable

**Skooks Landing:** This site was issued a map reserve under section 16 of the lands act in 1976, for Environment, Conservation, and Recreation. It must also be noted that adjacent and to the north of this site there was an Indian Reserve previously, which has been inactive for years. The Kaska First Nation has blocked this access a couple of times in recent years. The Kaska seem to be interested in some economic development in this area.

During recent TREATY LAND discussions, the Provincial Government appears to ignore existing section 16 reserves. There has been recent discussions regarding improvements to the Skooks Landing boat launch.

This site provides river boat access to the to Liard river so that boaters can access the Kechika and Turnagain rivers located in the northwest portion of the Muskwa-Kechika Management Area.

**Halfway River:** Updates regarding the Halfway River trail issue. Hopefully, with the appointment of Denise Booy with RSTBC this file will move forward.

**Northern Rockies Park:** There is a Final Draft. There are no changes regarding park access, except for some minor changes regarding snow machines, which will have minimal impact on hunting or recreational activities.

There are two issues in the Draft that concern hunting/recreation: There was considerable push back against these issues at the public advisor meetings.

1) Use only dead and down trees for firewood

2) Can only carry firearms during lawful hunting seasons as listed in the Provincial Hunting Regulations.

There was discussion with Parks about applying for permits to allow existing uses to continue, however this would mean those entering the Park would need to obtain permits.

There a couple of other potential access issues that will need clarification.

#### Mile 178 Access

**Access to Redfern Trail at mile 178 of the Alaska Highway:** Due to changing ownership of oil and gas facilities, this access issue developed. Embride sold its interests to North River Midstream. Part of North River operational issue was deactivated Petroleum Resource Develop Roads. This would remove access from mile 178 of the Alaska Highway to the start of the Redfern trail. This activity has not happened yet and will require some coordination between RSTBC and the Oil and GAs Commission.

**Mile 428 Access; Nonda Creek:** There has be some talk of Northwest Tel deactivating the access bridge at mile 428 of the Alaska Highway that provides access across the Toad River on the Nonda Creek access.

These other process/issues may affect access:

1. The continuing land used issues with Treaty :8 First Nations regarding TLE lands and Site C land compensations.
2. The upcoming review of the Fort St John Land and Resources Management Plan.
3. The upcoming planning regarding Caribou Management Plans for NE BC.
4. The proposed Section 11 and Partnership Agreement regarding Southern Mountain Caribou.
5. The Federal Government proposed upcoming Grizzly Bear Management Plan.
6. The proposal by the Kaska First Nations for their proposed conservancy.
7. The Completion of the Northern Rocky Mountains and Graham-Laurier parks management plans.

**Closing Comments:** When it come to dealing with Access, all clubs need to keep their Region inform as to what your club is working on, that way if there are any problems the Region is up to-date and then the Region can also keep the BCWF Access Chair inform.

Respectfully Submitted By: David Oliver, Access Committee Chair

## **Q4 REPORT, 2019 FIREARMS COMMITTEE**



In Q4-2019, as in previous quarters in 2019, the main activity of the Firearms Committee was reaching out to the recreational firearms community informing them about Bill C-71, the new firearms legislation.

Firearms Committee Chair, Gary Mauser, represented BCWF at the Historical Arms Collectors Society gun shows in October, November, and December [many gun show participants are BCWF members]. He also visited gun clubs updating members about the progress of Public Safety Minister Blair/PM Trudeau's implementation of C-71, and encouraging them to vote.

In Q4, the Firearms Committee posted the video we made in Q3 on YouTube and shared it with BCWF encouraging BCWF to post it as well. Thanks to the enthusiastic help from volunteers at Ridgedale R&G, and with the support of BCWF Youth Coordinator, Chris Lim, we hired a professional videographer to make a YouTube video, which included footage at a Wild Kidz event.

The video was designed for clubs and regions to show to the public as an introduction to the shooting sports. It should be particularly helpful to young parents as part of safety training sessions. The objective of the video is to showcase how target sports are a great way to teach teens and pre-teens personal responsibility.

<https://www.youtube.com/watch?v=MS9bZfz3sqo>

Firearms Committee Chair, Gary Mauser personally contacted several MPs and MP candidates to outline problems with Bill C-71 and the problems the legislation posed for recreational firearms owners without any compensating benefits to public safety.

During Q4, the Firearms Committee continued to encourage Canadians to sign and post letters to Minister Blair criticizing Bill C-71. At least 42 more people signed a letter to Minister Blair in Q4. Several people took blank copies volunteering to copy and distribute them at their gun clubs.

Copies of these signed letters were also sent to the signatory's Member of Parliament:

1 to NDP MP  
3 to Liberal MPs  
38 to Conservative MPs

During Q4, wearing his hat as an "independent professor," Mauser posted multiple comments on justiceforgunowners.ca and on various social media platforms which were shared by thegunblog.ca, Dennis Young's blog, and other social media sites.

A paper that professor Mauser co-wrote with John Lott, PhD, and Harvard professor Arthur Berg, was published in the Cato Institute's flagship journal, *Regulation*, "Do Researchers From Different Fields Have a Consensus on Gun Control Laws and Do Registered Voters Agree With Any of Them?"

Our study debunked claims by the *New York Times* that experts – regardless of professional background – agree about the effectiveness of stricter gun laws and support the imposition of such legislation.

<https://www.cato.org/sites/cato.org/files/2019-12/v42n4-3.pdf>

Thanks to an invitation by the Council of Licenced Firearms Owners Incorporated (COLFO) – the largest voluntary shooting-related organisation in New Zealand – professor Mauser was invited to submit a critique of the Arms Bill of 2019 to the New Zealand Parliamentary Select Committee. This committee is evaluating the second round of legal impositions on law-abiding firearms owners after a violent shooting by a deranged environmentalist.

[https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/52SCFE\\_EVI\\_91272\\_FE23790/gary-mauser](https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/52SCFE_EVI_91272_FE23790/gary-mauser)

[https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3045830](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3045830)

Professor Mauser was one of the few experts who was also invited to give an oral presentation to the New Zealand Parliamentary Select Committee. His presentation was based on his written submission to the same committee and presented at a video conference. BCWF will not be billed for his travel to New Zealand.

A copy of his presentation is posted on the blogsite, justiceforgunowners.ca

<https://justiceforgunowners.ca/new-zealand-arms-bill-is-a-red-herring/>

Respectfully Submitted By: Gary Mauser, Firearms Committee Chair



## **Q4 REPORT, 2019**

### **FISHERIES COMMITTEE – INLAND INTERIOR**

**Overview:** The terms of reference (TOR) for this committee have been submitted to the President for approval. This committee is primarily concerned with inland fisheries issues focussing on the southern part of the province. i.e. Fraser and Columbia watersheds. Much of the recent work has been focused on the lower Fraser River and the impacts of the chum salmon gill net fishery that causes by-catch mortality of endangered interior Fraser steelhead (Thompson and Chilcotin steelhead --IFS). The committee is comprised: H. Andrusak, chair, and members include Dr. Ken Ashley, Marc Laynes, Kevin Estrada and Shaun Hollingsworth. Contributors on specific issues include Dr. Marvin Rosenau and Bob Hooton. The following report summarizes recent IIFC work:

**Interior Fraser Steelhead:** Climate change, ocean survival conditions and chum salmon gill net interceptions are the three main cause of IFS decline. Only chum harvest hence by-catch can be controlled. The BCWF along with all other fisheries organizations believe that removal of gill nets is the only viable solution for recovery of IFS. In early December Some IIFC committee members met with Ministers Donaldson and Popham to express concerns w/r to declining numbers of IFS.

An important point confirmed at that meeting was Minister Popham confirming her ministry supports selective fishing methods. This now aligns the three provinces ministries on this issue. A second point made was that the BCWF does not support hatchery intervention w/r to IFS steelhead. Doing so would simply permit DFO to not have to transition from gill nets to more selective fishing methods. While some BCWF members express support for a hatchery solution the science does not support such a measure.

At the Ministers meeting a solution was presented for the problematic chum fishery. Instead of fishing for chum salmon with gill nets it was proposed that chum salmon be produced via hatcheries big and small that are already located on tributaries to the lower Fraser. The returning adults could then be harvested at the outfall(s) of the hatcheries or channels. Such terminal fisheries would negate the necessity of harvesting chums in the main river and the terminal harvest would avoid IFS by-catch. The Premiers office evidently liked the proposal, and this was further discussed a few days alter with the Premiers advisor. It is acknowledged that FNs buy-in is necessary and therefore we intend on working with those who want to work with the BCWF.

Promoting use of selective fishing methods such as pond nets, fish wheels or traps is a major part of this committee's goal. A few First Nations have submitted proposals for pilot selective fishing on the lower Fraser and Harrison rivers. The committee has expressed support for these proposals for funding through the BCSHRIF program (\$142 million salmon fund). At time of writing this was being discussed with Minister Popham.

**Kootenay Lake:** The Expert committee advising region 4 Kootenay fisheries staff met in late November and the BCWF was represented by H. Andrusak. The issue remains---too many predators that have depressed the prey (kokanee) and ministry efforts to date have been minimal and ineffective. The local club---West Arm Outdoors Club---has submitted a proposal to reduce bull and rainbow trout through a head recovery program.

If this proposal is approved draws of \$300 per month will be made to those providing head samples and this is aimed at providing incentives for anglers to return to fishing on the lake. Angler effort is down 70% due to the kokanee collapse that in turn has resulted in significantly reduced size of the predators. Gerrard rainbow trout are now only 3-4 lbs compared to 15-20 lbs ten years ago. The club proposal has been supported by the Ministry and additional funds are planned to be added if the club proposal is approved.

**Big Bar Slide:** In early December the province provided some information on plans for fish passage remediation at the big bar slide. A request for proposals was advertised by DFO seeking ideas from the private sector. Potential plans include construction of a fishway, removal of big rocks that cause a velocity barrier or widening of the river through blasting and excavation. Whatever option is selected the work must be underway by mid-February before rising water levels occur.

**Dragon Lake:** As mentioned last in report plans are in place to introduce Horsefly rainbow trout into Dragon Lake. This strain of rainbow trout is highly predacious, and it is expected they will prey on introduced goldfish and provide excellent size trout to the angler.

**Fraser River Sturgeon:** This fall committee members Marc and Kevin have taken out representatives of all three political parties to fish for sturgeon and discuss the issues impacting this iconic species. The same problem of gillnets that negatively impact IFS also impact sturgeon. To make the point vividly two of the parties caught sturgeon with gill net markings and gillnet ingrown in the body of sturgeon.

**Heart of the Fraser:** Protection of the gravel reach of the Fraser River remains a very high priority. Several conservation groups including the BCWF are actively engaged in designating the area as an ecologically sensitive area under the revised Fisheries Act.

Respectfully Submitted By: Harvey Andrusak, Fisheries – Inland Interior Committee Chair



## **Q4 REPORT, 2019 FISHERIES COMMITTEE – SALTWATER**

Meetings leading up to the release of the Integrated Fisheries Management Plans took over much of the 4th. quarter for the saltwater group. Many of the concerns throughout the year that have had a substantial effect on our how we could proceed with our fishery have not been resolved yet.

**Killer Whales:** At least one of the preserves had no fishing visits from the whales. However, expect the closures still to be in place as more than one season will be needed to ensure the “right” closures.

**Seals and Sea Lions remain an issue for the Salish Sea.** The Christmas Herring sale was cancelled as the nets were destroyed by the sea lions when the fishermen tried to catch the herring.

**Huge concerns for the survival of Chinook to the upper Fraser river after the slide was discovered.** Work has been expedited by the Department of Fisheries and Oceans. This was brought up at the meeting Dec. 18<sup>th</sup> with the Sports Fishing Advisory Board Executive (SFAB) and the Regional Director General (RDG) as a joint concern.

**Prawns:** DFO has announced 125 per day. Our harvest of clams and oysters is in the same position. That is a substantial decrease.

**Are we going to be in a second year of a limit of 10 chinook salmon?** Where is the justification of this action, see Ken’s report.

**Coho in the south coast was almost as bad north coast but we did get some fishing for them later on, but they may have been US fish.** We are trying to establish a marked selective fishery on Coho as many of the small salmon enhancement projects have not been marking all the fish they produce; this will be a few years down the road from now. We will have to wait and see what the final agreement is, but it certainly looks to be a reduction for the Rec. fishery as Ken has said.

**Rock Fish** are becoming an issue for our Alaskan friends as well as us as they have closed their Demersal shelf rock fish complex (Yelloweye, Quillback, Copper, Rose thorn, China, Canary and Tiger rockfish) This is going to make things very interesting at the IPHC meeting early February.

**Halibut:** we expect a decrease in TAC for us all this year as we are still experiencing a decline in biomass perhaps due to a decline in females as a larger than expected percentage is being caught in the commercial fishery.

**Region One has supported Omega Hatchery** for several years now as they fight for the opportunity to raise S1 chinook smolts - these chinook live for one year in fresh water then migrate out to sea. These fish seem statistically to return at a much higher rate. Now we have agreement that this is worth a study. Hope to have more on this in early February.

Respectfully Submitted By: Ted Brookman, Fisheries – Saltwater Committee Chair

## **Q4 REPORT, 2019 FISHERIES COMMITTEE – TIDAL**

**Area “F” Troll Update:** The mismanagement of this fishery continues to be problematic. An Ottawa decision to keep the chinook fishery closed until Aug 20 to protect Fraser Chinook and allegedly to feed South Coast resident killer whales resulted in the release of 40,000 chinook while prosecuting a Coho troll fishery. Under the Pacific Salmon Treaty, the area F troll was entitled to keep those fish, but Ottawa said no. The post release mortality rate in this fishery is about 25% so 10,000 chinook toppled to the bottom of the ocean to feed the crabs. What a waste!

The area F directed Coho fishery harvested 183,000 pieces. This fishery takes place on the Alaska-Canada border and the fish are caught as soon as they enter Canadian water. Knowing it was going to be a year of low abundance both the SFAB and the BCWF objected to the aggressive nature of this fishery and asked DFO to pulse fish and to put a ceiling on the number of Coho that could be harvested in this fishery. Our concerns unfortunately fell on deaf ears, and the Chatham Sound and Skeena River recreational fishery suffered the consequences of virtually no Coho left to catch and very poor escapement to boot.

**Annual Chinook Limits Update:** Without any consultation with the SFAB in 2019, DFO reduced the Tidal Water Annual Chinook limit from 30 to 10. Don't be fooled into believing this was a conservation initiative. This was a re allocation away from the recreational fishery over to First Nations, seals and sea lions and the commercial fishery. The SFAB will be in discussion with DFO this spring to revisit this decision.

**Lax kw'alaams Lower Skeena Fish Trap Project:** First Nations are proposing to install a fish trap similar to the one they used on the Columbia River. The trap would be installed on the Lower Skeena across from and slightly up stream of the Tyee Test Fishery. It's intent in the first year of operation would be for scientific purposes but the vision is to have four of these traps to eventually replace gillnetting and eliminate the Tyee Test Fishery.

At first blush you think great, but the devil can be in the details. The SFAB is presently in discussions with DFO and the proponent to get a better understanding of the project and to fully understand how the recreational fishery might be impacted.

**Marine Protected Areas Update:** This is an on-going initiative that won't be wrapped up anytime soon. This is similar to land use planning and First Nations are playing a leading role. Our concern again is 'how will the recreational fishery be impacted.' Some areas are proposed to be no recreational fishery but FSC fisheries would continue.

**Central Coast Crab Initiative:** Central Coast First Nations are proposing to DFO that they should have F.N. only crab fishing areas based on traditional knowledge that indicates crabbing isn't as good as it used to be. The SFAB is saying that you can't rely exclusively on traditional knowledge and that proper data and science need to be incorporated first to see who is catching what before any decisions are made. My guess is that an aggressive commercial fishery in the area is responsible for the alleged downward trend in abundance and that commercial crab fishing exclusion zones up and down the coast is the best method to improve abundance for both First Nations and the recreational fishery

Respectfully Submitted By: Ken Franzen, Fisheries – Tidal Committee Chair

## **Q4 REPORT, 2019**

### **RECREATIONAL SPORTS SHOOTING COMMITTEE**

The BCWF Recreational Sports Shooting Committee (RSSC) continued to provide support to BCWF Club ranges dealing with such matters as lead and noise management, environmental management plans (EMP), and provincial and federal regulations and regulators that can adversely impact range management and operations.

Our committee was hit hard by Al Martin's death. He is missed by all. He carefully mentored me on arrival a few years ago in the work that we started on lead and noise. Our successes to date, were nurtured by him.

The RSSC provided advocacy in support of recreational shooting sports related to range operations (e.g. noise and lead) at the Federal, Provincial, Regional and Municipal level as we are capable of, and as needed.

On advocacy matters related to firearms legislation, we work in close support of the Firearms Committee and the leadership of Gary Mauser and will continue to do so.

BCWF Club ranges supported in Q-4 include:

- Keeping a watch on Cowichan Fish and Game Association, as they are being attacked by an Environmental NGO supported by the University of Victoria law programs (lead issues and their BC Park lease).
- Langley Rod and Gun Club (noise issues).
- Valley Fish and Game. I conducted my second site visit after an initial survey and briefed their Board and membership on BC environmental regulations related to range operations, with an emphasis on lead.
- Pemberton Wildlife Association Shooting Range. Provided them with evidence that the shooting range complies with any federal, provincial or municipal legislation that applies to the establishment and operation of such a facility regarding environmental protection, required for renewal of the FLNRO lease.
- Gold River Rod and Gun. Initial discussions on lead management.
- Arrow Lake. This was big. They had been notified by the Agricultural Land Commission (ALC) that their Agricultural Land Reserve lease was being terminated with short notice, and that full remediation of the site was required before vacancy. There was no appeal. Thomas Loo (the RSSC Deputy Chair) successfully identified a process and information content to provide for a reconsideration by the ALC of the decision, and had the club submit it.
- Vernon Fish and Game Club. They are coming up to their FLNRO 10 year lease renewal, and asked the RSSC for an environmental management plan (EMP) or template for creating a plan to submit with their renewal application. We have provided them with it.
- Parksville Qualicum Fish and Game. I provided templates draft on EMP, and proposed MoE Self-assessment for their AGM, and other documents.

The BC MoE continued to put effort and resources in 2019 into development of a draft range EMP template, and initial consultation for the development of a code of Practice (CoP for ranges to manage lead and lead recycling. This is expected to be sent out to all ranges in early 2020 in draft form. The documents are going through extensive review in at least four BC Ministries.



I gave an update on lead and noise management issues to the BCWF Region 1 meeting in December.

I wish to thank the RSSC team members, i.e. Chuck, Tex, Jim, Guy, Wally, Doug R., Gary and Thomas Loo. This is a great team.

Finally, I need to single out Thomas Loo for his support to Arrow Lake. Frankly, without his knowledge and effort, the club would no doubt become bankrupt and shut down, a loss to the BCWF, and transform into an orphaned contaminated site headache for the ALC and the MoE to deal with. If, and it's a big if, the ALC reverses its decision, then I will strongly recommend Thomas for formal recognition by the BCWF. Sometimes one man can make a difference.

Respectfully Submitted By: Doug Bancroft, Recreational Sports Shooting Committee Chair

## **Q4 REPORT, 2019 WILDLIFE & ALLOCATIONS COMMITTEE**

**Cariboo Moose Allocation/Environment Appeal Board Guide Outfitter Appeals:** As previously reported, the number of moose authorizations in some LEH zones in the Cariboo was decreased by up to 80%, and in some cases down to a single authorization for specific seasons. Guide Outfitter allocation and quota were correspondingly decreased.

The BCWF has now received submissions from most of the outfitters involved. Government lawyers asked the Environment Appeal Board for an extension, which was granted and correspondingly pushed the timelines back, making the BCWF's "participant" response due by January 28, 2020. The respondent (Director of Wildlife) must submit her written responses to the Appellants (Outfitters) and the Participants (BCWF) submissions by no later than February 14, 2020.

The BCWF has similar concerns to the impacted guide outfitters:

- The timing of the decision (July 2019), which gives LEH holders little time to make arrangements to participate in the hunt.
- The BCWF recognizes the government's commitment to work collaboratively with First Nations in regards to wildlife and habitat management, but government should not do so to the exclusion of representatives of licensed hunters in the collaborative process.
- The government should not be basing First Nation's food, social and ceremonial needs solely on anecdotal information, but rather in combination with historic First Nations harvest data.
- The concessions made to First Nations, in at least some cases, seem to go against recent moose inventory and composition (bull/cow ratios) data, and contrary to regional allocation recommendations.

**Provincial and Region Regulation Proposals 2020-2022:** The hunting and trapping regulation proposals of the upcoming 2020-2022 synopsis went live on the government's public engagement website on December 16, 2019 — the deadline for comments is Friday, January 17, 2020. The proposals are grouped according to those that are provincial in scope and those that are regional in scope. Proposals can come from stakeholder groups, First Nations and the provincial government. Provincial proposals are typically discussed at the Provincial Hunting and Trapping Advisory Team (PHTAT) and regional proposals at regional advisory groups. The BCWF has representation at PHTAT and regional BCWF representatives sit at the regional tables. Proposals are then forwarded to the Wildlife and Habitat Branch in Victoria and are either approved, amended or rejected to take to the public through the engagement website. Stakeholders', the public's, First Nations', and Wildlife and Habitat staff's comments are then considered by the Minister of FLNRORD for final status.

The chair of the wildlife committee held two teleconferences (the second was a repeat of the first) in mid-December to have the BCWF's "Hunting Methods" PHTAT subcommittee members go through each of the provincial-in-scope proposals that the subcommittee and ultimately PHTAT recommended to government. All wildlife committee members and regional presidents were invited and in total 13 individuals attended including the two BCWF vice-presidents.

In particular, one of the provincial proposals is getting a lot of attention from BCWF members and in social media. The BCWF is hearing from members concerned with the elimination of scopes on bows during bow-only seasons that was recommended by all members of PHTAT.

In response, the BCWF has reached out to members providing some rationale for the recommendation and by providing a poll that allows members to indicate if they are in favour, neutral, or opposed, including the ability to leave a comment. The BCWF is committed to inform government of the members' position.

The BCWF has also reached out to members encouraging them to provide positive feedback on the regulations they support as well as critical feedback, with rationale, on proposals they don't support.

The PHTAT Hunting Methods sub-committee will be meeting at the end of January 2020 to review the results of the public engagement for the proposals related to hunting methods.

**Improving Wildlife Management and Habitat Conservation aka Together for Wildlife:** The BCWF has submitted their response to government on the draft "Together for Wildlife" document (**Appendix 2 – Page 18**) that was posted on the government's engagement website in late November. The BCWF also reached out to members encouraging them to provide comments before the January 9, 2020 deadline.

Although the BCWF is supportive of the principles outlined in the draft document, the BCWF sees no clear pathway to landscape level changes that will benefit wildlife and their habitats. It is also clear that government has reneged on their pre and post election promises of dedicated funding and making wildlife and habitat a priority, dedicating all hunting licence fees to wildlife and habitat management and to bringing people who rely on our wildlife resources together and ensuring they all participate in and contribute financially to conservation.

The BCWF recommendations to government are:

- That the budget for the Wildlife and Habitat Branch become a priority and be increased.
- That all licence fees associated with hunting be dedicated to wildlife and habitat management.
- That all who make money off natural resource extraction, or have an interest in wildlife and habitat, contribute to a dedicated funding mechanism. This must include all sectors such as forestry, mining, wildlife viewing, commercial recreation services, hunters and anglers, etc.
- That the funding mechanism is independent from government. People are more supportive of paying taxes when they know exactly where the funding is spent and when they have a voice. This also encourages other conservation organizations, philanthropists and corporate citizens to contribute on an ongoing basis.
- That clear, transparent and achievable **legislated** objectives for habitat and wildlife are created and that wildlife and habitat has equal status to other land-use legislation.
- That the dedicated funding be focused on evidence-based landscape-level actions that treat causes and produce effects.
- That the Minister's Wildlife Advisory Council is replaced by a roundtable which includes First Nations, and of which government is but one voice. The roundtable would be a decision-making body, not an advisory council, to ensure legitimacy, trust and integrity is carried forward over the long-term.
- That the roundtable meets as soon as possible to collaborate on how the "Together for Wildlife" funding is spent with emphasis on conserving and restoring habitat and wildlife according to already established wildlife and habitat objectives.
- That the current government structure is overhauled, and agencies related to fish, wildlife and habitat are housed within a Ministry that has line-of-sight between headquarters and regions, and where sustainability of our fish, wildlife and habitat resources is the main priority.



**Chronic Wasting Disease:** In total, there are now results from 1004 samples from the Kootenays — all are negative. Government will be submitting 140 samples from the Peace Region early in January. Samples from road kills are still coming from both regions as well. The BCWF and government's Wildlife Health group would like to thank BCWF regions and clubs, members and others who have stepped-up financially and who have contributed heads for this important initiative.

Respectfully Submitted By: Gerry Paille, Wildlife & Allocations Chair

**BCWF Submission on “Together for Wildlife”**

<https://bcwf.bc.ca/wp-content/uploads/2020/01/BCWF-Response-to-Together-For-Wildlife-Document.pdf>

**Appendix 1**  
**Letter From Kevin Haberl**  
**Director, Authorizations**  
**South Coast Region**

File: 11100-00/B001

December 31, 2019

**BY EMAIL**

To local governments and stakeholders in the Sunshine Coast and Chilliwack Natural Resource Districts: The Ministry of Forests, Lands, Natural Resource Operations and Rural Development (the Ministry) is reminding all recreational users of Crown land that authorization under the *Land Act* is required to use Crown land for business purposes such as guiding or tours. Commercial recreation and tourism enterprises are managed under the Ministry's Adventure Tourism Policy.

Adventure Tourism (AT) refers to commercial recreation/tourism operators and educational institutions who provide outdoor recreation/tourism activities on provincial Crown land (including land covered by water) for compensation or reward – these activities include: training, transportation, adventure experiences, food services, entertainment, races and improvements (e.g. lodge/cabin accommodations, structures, and docks).

Examples of commercial AT activities on Crown land that require authorization include:

- Non-motorized mountain and ski guiding activities;
- Non-motorized guided tours or coaching activities such as mountain biking, hiking/running, or fitness programs;
- Non-motorized and motorized guided aquatic activities that use Crown land put-in/take-out/rest areas such as rafting, kayaking, paddle boarding, kiteboarding, personal watercraft tours, jetboating;
- Special events such as running, mountain biking, or adventure races;
- Custom backcountry adventures or experiences offered by concierge services or travel planners;
- Motorized guided tours or coaching activities such as ATV and snowmobiling tours;
- Snowcat or other motorized access recreation;
- Helicopter or float plane accessed commercial tourism experiences that make use of Crown land such as heli-skiing, Heli-biking, Heli-dining or offering to fly clients to remote natural features on Crown land;
- Existing authorized AT operators seeking to offer new commercial activities; and
- Commercial filming involving uses such as helicopter access, structures, special effects and public access restrictions (under the Commercial-General Policy).

The Ministry recognizes the importance of Adventure Tourism and seeks to promote a sustainable tourism industry with the following key principles:

- Providing continued access and tenure certainty on provincial Crown land for the AT sector;
- Balancing the interests of existing AT Tenure holders with the interests of new AT applicants by ensuring there is diverse, responsible and sustainable growth in AT/nature-based tourism;
- Encouraging respect and cooperation among AT Tenure holders;
- Promoting safety for the public, AT Tenure holder and clients;
- Encouraging sustainable tourism practices

Authorized AT operators possess a Licence of Occupation or Lease with the Ministry and are contractually bound to operate within the scope of their approved Management Plan, which outlines the extent of the permitted activities considering First Nations rights, environmental values and the public interest. The Ministry's oversight of these tenures is critical to ensure that all values on the land base are managed appropriately. The Ministry also ensures that operators have insurance and emergency response plans in place to protect clients.

The public is encouraged to pursue Adventure Tourism experiences with authorized operators. Many companies and operators in the marketplace are NOT authorized and are in non-compliance. A recent increase in unauthorized Adventure Tourism activity has resulted in increased conflict between AT operators and public recreation users, in addition to negative impacts to wildlife, the environment, and important cultural areas.

The Ministry is also concerned that helicopter companies are increasingly providing AT experiences on Crown land without authorization. These activities can put wildlife habitat areas and other sensitive wilderness values at risk and impact the visitor experience for other users. Commercial AT activities that make use of Crown land to facilitate the experience, require authorization under the *Land Act*.

Ministry staff are actively working to address the non-compliant AT operations to support both the public's and authorized AT operators' interests in responsible use of Crown land. In the Sea to Sky corridor this year, Ministry officials have already served several AT operators with Trespass Notices for conducting activities on Crown land without authorization. Financial penalties and orders to cease unauthorized activities have been included. Numerous investigations are ongoing. Unauthorized use of Crown land is a Trespass Offence under Section 60 of the *Land Act* and may result in administrative penalties of up to \$1000, and/or seizure of assets related to the offence. Significant offences may be prosecuted and result in fines of up to \$20,000 or 6 months in jail.

When booking an adventure experience on Crown land, ask about what authorizations the operator has and even for a license number. Legitimate AT providers worked hard to secure authorizations and will be happy to provide it!

**To report natural resource violations, including damage to or illegal use of Crown land, forest or water resources, call 1 877 952-7277 (Select Option "2") or visit [gov.bc.ca/NRV](http://gov.bc.ca/NRV).**

[Thank you for your assistance in improving the management of our natural resources.](#)

Yours truly,



Kevin Haberl, RPF  
Director, Authorizations  
South Coast Region



## Appendix 2 BCWF Submission on 'Together for Wildlife'

### BC Wildlife Federation Response to 'Together for Wildlife'

Below is a response to the British Columbia government's "Together for Wildlife" document. Overall, the BC Wildlife Federation (BCWF) is disappointed in the trajectory of this process, the lack of transparency, broken trust, and government's failure to commit to do what it said it would do. Currently, the BCWF sees no clear pathway from the 'Together for Wildlife' document to landscape level changes that will benefit wildlife and their habitats.

Before and after the last provincial election, the current government of British Columbia stated:

*"British Columbia's biodiversity, fish and wildlife populations and the habitat which they depend are under threat due to lack of funding, government cuts to staff and ineffective policies (BC NDP, 2017, p.59)"*

First, there have been neither meaningful actions, nor for the most part, any resulting positive changes in the status of wildlife populations or habitat over the 32 months since the last provincial election. To the contrary, habitat loss via unsustainable natural resource extraction and a lack of land use planning have continued to exacerbate wildlife declines across the province. Several wildlife populations across the province of British Columbia are now at record lows, and in further decline, and the provincial government has done nothing but document this decline.

While the number of threats to habitat and wildlife goes up, the provincial budget goes up, and yet the proportion of dollars for natural resource management goes down. The budget for the Fish and Wildlife Branch has declined from 0.64% of the provincial budget in 1954; government funding for the Fish and Wildlife Branch is now likely less than 0.04% of the provincial budget, a change of 93%. The BCWF is aware of ongoing budget cuts and hiring freezes within both the FLNRORD and the Ministry of Environment (MoE), changes which government has not made the public aware of. This provincial government may be spending proportionally fewer dollars of the provincial budget on taking care of land, water, air, fish and wildlife than any other government in British Columbia's history.

BC Government Commitment: *"We will ensure dedicated funding for wildlife and habitat conservation, give wildlife and habitat a priority.... We will put all funds from hunting licenses and tags into a dedicated fund for wildlife and habitat conservation (BC NDP, 2017, p.60)"*

There is currently no plan to dedicate the funds from hunting licenses. The word "dedicated" was not incorporated into the document until after the BCWF expressed extreme frustration in government's unwillingness to meet its own written commitment. In 2017, there were ~\$12M in hunting licenses and tags which have not been dedicated, more than the \$10M government has now stated it will increase the wildlife branch's budget, even while concurrently cutting its budget.

It is painfully obvious to the professional biologists within government and the stakeholders dedicated to conservation that this budgeted amount will not change the trajectory of wildlife populations.

BC Government Commitment: *"We will base decisions on science while also hiring more conservation officers (BC NDP, 2017, p.60)"*

Government has not based its decisions on science. These include closures in fire areas, while continuing unsustainable salvage logging; recent cuts to moose allowable harvest in the Cariboo; ongoing destruction of endangered and threatened caribou habitat and a number of species-specific management plans that

government has done nothing about. Recommendations from expensive initiatives targeted at moose, such as the Gorley Report and the Moose Solutions Roundtable in the Cariboo, have not been implemented and do not seem to be the focus of 'Together for Wildlife,' even though widely supported by stakeholders and First Nations.

### Funding and Priorities

The BCWF is aware government has already decided, in isolation of everyone involved in the process, how it intends on spending the \$10M commitment, and that the overwhelming majority is going into capacity, inventory and monitoring. Counting wildlife as it declines neither conserves nor restores wildlife populations. Despite a government commitment to look at additional funding mechanisms, and support from every single environmental organization for additional funding mechanisms, any discussion to this effect has been wiped from the 'Together for Wildlife' document.

It is clear this exercise has become a capacity re-building exercise for government, which is needed, without any outcome that is meaningful for wildlife.

Wildlife and habitat management means: ecosystem restoration, controlled burns, managing invasive weeds, predators, prey, highway mortality, linear features, changing industry practices, acquiring habitat. These are what the dollars should be focused on and they should be the priority. It is also not the fish and habitat branch's responsibility to clean-up industries' messes.

### Leveraging

Government indicates it will leverage additional funding with other government sources and the Habitat Conservation Trust Foundation. Using additional funding opportunities within government is not leveraging; that is simply reallocating misappropriated budgets, many of which will decline given government's budgeting direction. The use of other government funding opportunities has been used for decades and has not translated into a stabilized or positive wildlife trajectory.

Given government focus on counting wildlife as it disappears, it is unlikely that resident hunters, the largest supporters of the Habitat Conservation Trust Foundation, will be inclined to partner with government on much. This internalized and exclusive approach will alienate non-government funding sources as conservationists will not invest in a government which is unable to demonstrate integrity, trust, or a long-term commitment to sustainability.

### Legislative Review

Government has suggested it will review other legislation to see where wildlife fits in. Wildlife and habitat is already mentioned in legislation such as the *Forest and Range Practices Act*, yet habitat and wildlife values have declined to record low levels.

It is disappointing that industries such as logging, oil and gas and mining have legislation which provides certainty, and yet there is no legislation which ensures certainty for habitat and wildlife in British Columbia. The province should adopt natural resource legislation which either covers all uses under one piece of legislation, or individual users under their own legislation. Suggesting government will try to amend other legislation to give habitat and wildlife a placeholder supports only the status quo. This is a straw man argument, which is designed to prolong any possible change until after the next election.

### Structure

The current provincial structure for fish, wildlife and habitat management is built to fail. Several functions related to the sustainability of our natural resources are split between the Ministry of Environment (MoE) and the Forests, Lands, Natural Resource and Rural Development Ministry (FLNRORD).

The fish and wildlife branch is buried with the Ministry of FLNRORD, with budget and staffing levels that are rounding errors within the Ministry. Fish and wildlife branch directors and headquarters staff have been cut off from regional operations and have no line-of-sight to regional staff.

Senior leadership positions in Victoria are and have been comprised nearly entirely of foresters and other natural resource professionals, leaving wildlife and habitat professionals largely a minority group in the discussion.

At the regional level the same occurs. Fish and wildlife branch regional staff budgets and direction come from supervisors (Director of Resource Management; Regional Executive Director; Area Assistant Deputy Minister) who are almost always foresters, and next to never fish and wildlife professionals. This inevitably leads to funding and priorities which are focused on everything other than wildlife and habitat.

### First Nations

The BCWF is disappointed the provincial government continues to isolate First Nations and non-First Nations. This approach was readily apparent in the Northeast when the Provincial and Federal Governments decided to act on caribou recovery in isolation of effected communities and the public. The government should be taking an inclusive approach to build relationships and have people who care about wildlife work together.

### Recommendations

- That the budget for the Wildlife and Habitat Branch become a priority and is increased.
- That all license fees associated with hunting be dedicated to wildlife and habitat management.
- That all who make money off natural resource extraction, or have an interest in wildlife and habitat, contribute to a dedicated funding mechanism. This must include all sectors such as forestry, mining, wildlife viewing, commercial recreation services, hunters and anglers, etc.
- That the funding mechanism is independent from government. People are more supportive of paying taxes when they know exactly where the funding is spent and when they have a voice. This also encourages other conservation organizations, philanthropists and corporate citizens to contribute on an ongoing basis.
- That clear, transparent and achievable **legislated** objectives for habitat and wildlife are created and that wildlife and habitat has equal status to other land-use legislation.
- That the dedicated funding be focused on evidence-based landscape-level actions that treat causes and produce effects.
- That the Minister's Wildlife Advisory Council is replaced by a roundtable which includes First Nations, and of which government is but one voice. The roundtable would be a decision-making body, not an advisory council, to ensure legitimacy, trust and integrity is carried forward over the long-term.
- That the roundtable meets as soon as possible to collaborate on how the 'Together for Wildlife' funding is spent with emphasis on conserving and restoring habitat and wildlife according to already established wildlife and habitat objectives.
- That the current government structure is overhauled, and agencies related to fish, wildlife and habitat are housed within a Ministry that has line-of-sight between headquarters and regions, and where sustainability of our fish, wildlife and habitat resources is the main priority.

### Conclusion

This government said it would give wildlife and habitat a priority, dedicate funding for conservation, restore capacity, create effective policies and ensure that all people who rely on wildlife pay into conservation (BC NDP, 2017, p.60). Government has failed to do what it stated it would, both before and since the last provincial election.



In the government's "NDP Wildlife Position Improving Wildlife Management" document, it states: "*We need to plan for seven generations and not on a four-year political cycle.*" There is nothing in this document that meets any of government's written commitments prior to the next provincial election and it is readily apparent that managing on a four-year political cycle is exactly what the government intends on doing. Anything which could be of value to restoring wildlife and habitat at a meaningful scale are targeted after the next provincial election, and even then, it is only a plan to plan.

The government's self-identified principles in the 'Together for Wildlife' document include: Trust, collaboration, respect, responsiveness, recognition, transparency, accountability, evidence-based decisions, balance, innovation, and interconnectedness — the BC Wildlife Federation fully supports these principles. The BCWF is not convinced that government's integrity is consistent with these principles given their draft 'Together for Wildlife' document.

The current document is a status quo approach, which continues to make government an entity that says wildlife and habitat is a priority, while cutting budgets and managing wildlife populations to zero. It is clear government's self-interested power maintaining approach has taken over the process, and that habitat and wildlife are only a passing thought in a budgeting and decision-making process which is singularly focused on urban BC.

The BC Wildlife Federation expected government to keep its word during the 'Improving Wildlife Management and Habitat Conservation' initiative and dedicated countless hours attending meetings and webinars in support of the process only to see key, well supported recommendations and actions missing from the final draft document — many other stakeholder groups did the same. The resulting document and the lack of a clear pathway to improvement does not meet the expectation of our membership. As the oldest and largest conservation organization in British Columbia, we expect government to do what it said it would do. Those platform commitments can be found on p.59 and p.60 of the 2017 BC NDP Platform (<https://action.bcndp.ca/page/-/bcndp/docs/BC-NDP-Platform-2017.pdf>) and via the NDP Wildlife Position document (attached).