



Unit 103 – 4622 Greig Avenue, Terrace, British Columbia, Canada, V8G 1M9
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Attn: Biodiversity and Ecosystem Health Framework Team
Government of British Columbia
biodiversity.ecosystemhealth@gov.bc.ca

To Whom It May Concern:

We at SkeenaWild appreciate the opportunity to comment on the draft Biodiversity and Ecosystem Framework (referred to as the “Framework” hereafter). We commend the BC Government for initiating this paradigm shift in land management. The Framework *could* be an important step towards course correcting current management regimes to better match the current climate and biodiversity imperatives. SkeenaWild applauds the commitments to make biodiversity and ecosystem health a priority and recognition that it must be formalized through legislation. We must not be naïve about the ability of the Province to implement this framework in a meaningful, transparent, culturally appropriate, and measurable way. We’ve seen this show. We’ve witnessed decades of unfulfilled government frameworks, strategy documents, initiatives, forums, planning tables, etc., developed to improve management practices and their impact on ecosystems, biodiversity, and climate change. While righteous, these good intentions have not resulted in the action necessary to keep up with the pace of the biodiversity and climate crises. We simply don’t have time to get this wrong.

As an organization dedicated to the health and resilience of wild salmon, some input provided is through a salmon lens. Salmon health – and more specifically salmon habitat health – can be a powerful indicator of overall ecosystem health. This federally managed species is greatly impacted by provincial policy, legislation land use decisions, yet salmon are not mentioned once in this framework. This glaring omission must be addressed. Maintaining salmon habitat will enrich the health of our communities, cultures, and economies – all of which are foundational and aligned with the principles set forth in the Framework.

SkeenaWild proposes the following to improve the robustness of this Framework and to help assure its successful implementation:

Address the Salmon Gap

Salmon are a federally managed species, yet provincial land use decisions greatly impact their habitat. As part of the Ministry of Water Lands and Resource Stewardship’s mission to fill knowledge and policy gaps to implement the Framework, an obvious path forward should include integrating habitat mandates set out under the BC Wild Salmon Strategy. In 2019, your government made some encouraging strides towards prioritizing their role in the future health and resilience of BC’s wild salmon habitat, however little legislative progress has been made. Specific measures to protect habitat are absent despite readily available and widely accepted scientific frameworks set out under the 2009 Wild Salmon Policy (WSP) Habitat Working Group

Building a global model



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report¹. We plead with the provincial government to commit to helping implement the habitat components (strategies 2 & 4) of the federal WSP. These strategies use measurable salmon habitat indicators and thresholds to monitor habitat and assess cumulative effects. We must integrate these data into provincial decision-making information systems. Additionally, there is an opportunity for the Province to require salmon habitat impact assessments to be incorporated into environmental assessments for project proposals that impact salmon habitat. The WSP habitat indicators and assessment methods provide the necessary tools to accomplish this.

Pilot Ecologically and Spatially Appropriate Tools

Each watershed or landscape unit needs to have a level of ecosystem protection and restoration appropriate to its ecosystem type, hydrology, climate, and natural disturbance regime. For instance, using risk thresholds to identify the percentage of a watershed that can be logged/developed before it risks losing its ability to support water quality and stream health supports good decision-making. SkeenaWild is using this tool in the Skeena Watershed (Babine River and Kispiox River so far) to inform the status of watershed integrity at the watershed level. The Watershed Stewardship Decision Support Tool represents a significant step toward ensuring a transparent and scientifically based approach to assess and manage watershed health and integrity. We invite the Province to pilot this tool in the Skeena watershed.

<https://maps.skeenasalmon.info/maps/672>

<https://maps.skeenasalmon.info/maps/702>

Commit to 30 x 30

Increasingly conservation biologists recognize that to protect many species and ecological processes, up to 50% of the land base must remain intact, making 30x30 no longer a far-reaching proposition. The goal to protect 30% of land and marine environments by 2030 has been endorsed by both federal and provincial governments, therefore the Framework must reflect and incorporate those endorsements. Meeting 30x30 will require a multi-pronged approach: old-growth forest logging deferrals, old growth management areas, other effective conservation measures, Indigenous Protected and Conserved Areas (IPCAs), conservation easements on private lands, restoration, and recovery plans to name a few. Furthermore, the Framework minimizes the importance of a diverse and representative network of protected areas for sustaining biodiversity and ecosystem health. It even implies that efforts to protect, restore, or enhance should be confined to cases where "an ecosystem is severely degraded or at risk." This approach is shortsighted.

¹ H.C. Stalberg, R.B. Lauzier, E.A. MacIsaac, M. Porter, and C. Murray (2009) Canada's policy for conservation of wild pacific salmon: Stream, lake, and estuarine habitat indicators. *Oceans, Habitat and Enhancement Branch. Fisheries and Oceans Canada.*



Additionally, many Indigenous governments have already taken action to meet protection goals within their respective territories, despite the lack of provincial recognition. Beyond its initial statement of principles, the Framework does not tangibly indicate whether and how the Province intends to align its laws, policies, and practices with Indigenous-led conservation, and with governance of IPCAs. The absence of any reference to IPCAs is another glaring omission from the Framework.

Legalize Indigenous-led Land Use Planning

Under Section 5 (Actions) of the draft Framework, the Province states that it will “Incorporate ecosystem health and biodiversity objectives and standards in all planning activities (e.g., Land Use Planning, Forest Landscape Planning, Watershed Planning), in a manner that enables First Nations and the Province to work together in an inclusive and transparent way to adjust the objectives and standards to meet the goals for specific areas.” This language is encouraging, but vague.

One way to effectively accomplish this is to legally adopt robust, spatially explicit Indigenous-led, ecosystem-based land use plans, which simultaneously supports the Provinces need to advance reconciliation. These plans provide a culturally and ecologically appropriate path to help advance the paradigm shift from outdated forestry practices and land use plans that do not protect functioning habitats to detailed spatially explicit land use plans that protect wildlife, ecosystems, culture, and local economies. These land use plans provide a clear path forward for how, when, and where development can occur on the land base without conflict. With some Indigenous-led land use plans already operationalized in the Skeena Watershed, it’s clear that they provide guidance and certainty for sustainable rates of resource development and can concurrently foster positive respectful relationships, help promote long-term ecological resilience, protect shared values, and maximize benefits to local communities.

Meaningful Co-Governance

Establishing an Office of Biodiversity and Ecosystem Health is encouraging. However, it must be a co-governed entity with independent Western and Indigenous scientific bodies to guide its actions. Current language in the framework suggests that this entity will be solely housed within the Public Service. This raises concerns regarding the Office's ability to effectively adopt a diverse approach that considers the variety of ecosystems, regions, and the local expertise of those most knowledgeable with them.

Align New Resource Proposals

The new legal framework must guide resource development. To effectively practice ecosystem-based management, new legislation must reward project proposals that align with biodiversity goals and reject those that do not. The evaluation procedures for projects should be



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comprehensive, strict, and devoid of exceptions, naturally encouraging proposals that are in line with biodiversity objectives.

Conclusion

To regain public trust, be effective, and reflect the urgency described in the draft Framework, the Province should:

- Immediately set a target date for new legislation.
- Undertake interim directives/orders, and education.
- Ensure that the public and independent scientists participate in guiding forest management reforms.
- Implement science-based decision support tools, some of which are already in existence, that support a cumulative impact framework with respect to biodiversity, salmon habitat health, and watershed hydrological integrity.
- Introduce legislative frameworks that include enforceable and measurable indicators to demonstrate progress towards achieving goals and objectives.
- The legal framework should reward resource projects that align with biodiversity goals and reject those that do not.
- Legalize Indigenous-led Land Use Plans.

Thank you for considering our recommendations. We look forward to future opportunities to work with your team to bring this bold vision to fruition.

Sincerely,

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