



From:

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To:

Honourable George Heyman  
Minister of Environment & Climate Change Strategy  
PO Box 9360 STN PROV GOVT  
Victoria BC, V8W 9M2

Dear Minister,

Species-at-risk legislation in British Columbia has the potential to be the most significant piece of legislation enacted in decades. I applaud the efforts of this government to change how British Columbian's preserve their vital wildlife resources. This legislation will significantly alter my business and possibly aid in conserving species, habitat, and ecosystems through the province. It will certainly change British Columbian's interaction with their environment. I would like to offer my input to this process in this letter, as a stakeholder in any other capacity at upcoming meetings.

As a wildlife professional active in the BC and Yukon I would like to support the development and implementation of this important legislation in any way I can. I currently and in the past review implementation of recovery efforts under the federal Species-At-Risk legislation (SARA), provide expert advice on the management of at-risk species and habitat to government, First Nations, Crown Corporations, and agriculture, forestry and mining industries. I also assist these groups to find innovative ways to mitigate impacts to at-risk species from their activities.

SARA has provided a strong framework and infrastructure to assess, list, and compile information on species at risk in Canada; however, strong complimentary legislation is needed to enhance the protection of habitat and ecosystems. My hope is that BC species-at-risk legislation will unify much of the legislation currently managing species at risk and their habitat by providing a strong and overarching umbrella to existing legislation. One example of this could be how BC species-at-risk legislation works to recover species in the Agricultural Land Reserve. Identifying ways to provide incentives to producers for good species at risk management is a key way providing mutual support for both agriculture and species at risk.

About 75%<sup>1</sup> of species listed by SARA occur in the south most of these species have large overlap with agricultural activities and private lands. Any provincial legislation must find mechanisms to reduce conflict with landowners and producers while conserving at risk species. Likewise, in the north where public land dominates and at-risk species occupy large areas at low densities, protections must allow species such as goshawks, wolverine, and caribou to coexist with resource development activities. First Nations and local communities living in these ecosystems must be able to provide for their families and

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<sup>1</sup> Harrower WL, Avery-Gomm S, Brogan JM, Csergo AM, Davidson LNK, Garani A, Halpin LR, Lipsen LPJ, Lee C, McCune J, Nelson J, Stinson CM, Whitney CK, Urquhart-Cronish M, and J Whitton. Analysis of recovery strategies under Canada's *Species at Risk Act*: modest progress and meagre targets.



communities while interacting with wildlife. These activities must occur while species are recovering and sometimes while they are being harvested. Innovative solutions must prevail or conflict that divides between southern and northern, or urban and rural British Columbian's will deepen.

In particular I would like to see the following questions addressed in any new legislation:

- During listing, what will be the process for providing transparent and separate scientific and socio-economic input to the minister, cabinet, and the legislature?
- What is recovery and how is that different for species that occur in small versus declining populations? Will the goal be to de-list all species (e.g., Northern Central and Southern Mountain Caribou), or will some species remain listed forever (e.g., Seaside Birds-foot Lotus).
- How will regional concerns be addressed in listing or during habitat protection? Will some species will be endangered in one area of the province but common in others? Will harvest be allowed where species are common? How will this be decided in a way that reduces conflict?
- What approach will be used for species with very small ranges in BC but large ranges elsewhere? How will habitat be promoted for these species and others that could be extirpated, especially where species ranges are predicted to move north with climate change.
- As ecosystems change how will recovery efforts use ecosystem, multi-species and habitat-based (e.g., managing landscapes attributes, and features) approaches to allow new species and ecosystems to become established and where will existing species go?
- What processes or approaches will allow economic or resource development to proceed when doing so will impact species at risk and their habitat? When is development going to far, when are restoration or no-net-loss policies sufficient? Is this different on public or private land?
- How will progress in enacting legislation and regulation be measured? Who will and when will independent auditing of on-the-ground species recover objectives be assessed?

These are admittedly highly technical questions, but from my experience reviewing and working with SARA listed and provincially listed species they are essential topics to be addressed prior to passage of any legislation. Again, my hope is that this input will help support the development of effective species-at-risk legislation in BC which benefits both the species and people of British Columbia. I would also like to offer any further help in this process either through direct conversation or participation as a stakeholder.

Sincerely,

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