



The Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource
Operations and Rural Development
PO Box 9391, Stn Prov Gov't,
Victoria, BC V8W 9M3

Re: FOREST AND RANGE PRACTICES ACT IMPROVEMENT INITIATIVE

July 3rd, 2019

Mr. Donaldson

Thank you for this opportunity to provide input on the proposed changes to the Forest and Range Practices Act. I am writing on behalf of the East Kootenay Invasive Species Council (EKISC). Our organisation is a non-profit that treats and reduces invasive plants, inventories aquatic and other species and educates the public on the presence and management of all these species and issues.

By way of background, invasive species are widely acknowledged as causing varying degrees of negative social, environmental and economic impacts across the globe, creating the second largest threat to biodiversity after habitat loss. Agricultural weeds alone account for the greatest economic impact of all known pests. Historically in the East Kootenay region, invasive plant management was carried out by provincial and local governments, industry, First Nations, and individual private landowners on lands that they occupied or managed. But EKISC has taken over these roles, treating all land bases and co-ordinating funding from 21 sources and accepting government funding from the Ministries of Transportation and Infrastructure, and Forests, Lands, Natural Resource Operations and Rural Development.

We request the following actions be undertaken by the government in this legal update.

1. **We applaud the movement towards landscape level planning but, to facilitate resilient ecosystems we ask that the requirement for planning cover:**
 - a. Multi (three to five) year timeframes so we can anticipate in advance the level of disturbance on the land base.
 - b. The plans should cover definite block boundaries and roads with areas and estimated time tables for work.
 - c. The plans should be referred to all stakeholders, In such a way that would facilitate an open dialogue.



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- d. The plans should require licensees and BCTS to seed road-side disturbances and landing areas in high value range areas such as the Natural Disturbance Type 4 areas in the Rocky Mountain Trench.
 - e. A lot of activities such as urban interface fuel management, wildlife habitat, range improvement and ecosystem restoration projects do not have long term planning requirements. Locally these programs generate a lot of work and area for us to cover. We would ask that legislation require these programs to produce integrated five year plans with all programs showing their treatments in the same format.
 2. **Although not truly legislative funding for the prevention, an immediate investment on species control should be multi year and consistent to avoid perpetual growing costs for invasive species management.**
 - a. With over 94% of the land base in British Columbia belonging to the Crown, government needs to increase investment as a basic level of stewardship.
 - b. We would request that \$15 million annually be invested into invasive species-prevention, monitoring and response to address all invasive species.
 - c. The funding should be timely. Our organisation has had to take out loans and lines of credit to pay our contractors while awaiting government funds to be allocated out across the province. We would prefer that invasive species funding come as government base funding. As our work is frequently following natural resource activities, allocating a portion of revenue from mining, forestry or agriculture could help us deal with infestations or risks arising from these activities.
 - d. Government should ensure funding is in place to respond to natural disaster areas (floods and wild fire) and ensure immediate monitoring, treatment and restoration, which includes invasive species management. This can help to reduce long term costs.
 3. **We would like to see increased investment and partnerships with non-government organizations, First Nations and local governments.**
 - a. Many Regional Invasive Species Organizations such as ourselves are service providers to the government, not just contractors. We would prefer to better codify roles and responsibilities with provincial and local governments in delivering landscape level invasive species management.
 4. **The government should create strong language in the creation of an objective that requires resilient invasive species free ecosystems in BC.**



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- a. There are good recommendations in the Invasive Species Strategy for BC that could be more strongly codified.
- 5. Streamline regulations and establish a single Invasive Species Act to ensure all invasive species, not just plants, are covered under the legislation.**
- a. Increase enforcement by government to ensure land occupiers (including Provincial Government) are acting upon existing and new legislation and regulations.
 - b. Streamline legislation to ensure all BC invasive species and pathways are covered by regulatory tools.

Thank you for this opportunity to put forward our concerns.

BJ Randall Harris
Chair
East Kootenay Invasive Species council