

## OHEB Key issues

### Habitat

Huge amount of development in Thompson, Okanagan, Nicola, Shuswap. We can't keep up. Referral backlog is up to 4 months. We are not able to pursue smaller occurrences that in the past we have pursued and prosecuted.

EPMP and staff reductions have reduced our ability to engage with proponents. Meeting the regulatory minimum is not as favourable for fish habitat as what we used to be able to do which was to get the lowest viable impact. Also, using the results based approach means that we don't have a handle on what is actually going on, and we often hear about things after the fact, making a problematic workload as investigations are costly, time consuming, and very confrontational.

RAR is hugely problematic. Many local governments are not meeting the spirit and intent with regard to fish and are taking the minimum compliance required approach, which is resulting in higher impact results than we had before RAR.

Project splitting is a current issue resulting from a poorly coordinated referral system. On some developments, we get 3 different projects – the upland rezoning, the foreshore works, and the marina development. This makes timelines complicated, and CEAA coordination and consultation very unwieldy.

We have no viable referral system. This is killing us as we have no standard way to communicate to proponents when they need to see us, what the appropriate standards are, and what to do if they need our engagement.

We are without question not attaining no net loss. The impacts of habitat impacts are well known (Bradford paper, WSP, Salmon 2100). Our staff are very dis-illusioned that the department is not doing more to address this.

The relationship between province and DFO is in a state of disfunction. We don't coordinate on referrals in any consistent way, and there is no guidance or leadership from Vancouver-Victoria on this.

We are totally disengaged from operational forestry. Rate's of cut have increased massively in response to MPB. We don't have a handle on what is going on, and are not providing any meaningful guidance on what we would like to see for fish.

Non-salmon habitat – we don't know what to do?

Water use – we have no standards like we do for things like riparian – we should set some as the department. We also are stretched beyond our limits to support various processes looking at water-use and availability, and have limited capacity to deliver true expertise. Many needs for data, little ability to gather the data.

Planning – we have totally pulled out of most planning exercises due to focus on EPMP type stuff and staff reductions. The result is leaving us in a react mode rather than being able to address problems at a higher strategic level.