

Hon. Jonathan Wilkinson  
Minister of Fisheries and Oceans Canada  
[min@dfo-mpo.gc.ca](mailto:min@dfo-mpo.gc.ca)

August 26, 2019

**Re: Follow-up to Rocky Mountain Ridged Mussel SARA decision**

Dear Minister Wilkinson,

Thank you for listening to our concerns about the proposed listing of the Rocky Mountain Ridged Mussel (RMRM), and the conflicts it would have created with our control of invasive Eurasian watermilfoil (milfoil) in Okanagan Lakes. We strongly appreciate your recommendation that further analysis is needed.

As an Endangered listing of the RMRM – and the subsequent restrictions on invasive milfoil control would have significant social, cultural and economic impacts on Okanagan communities, we request a full, transparent public process accompany this analysis, including:

1. A full public consultation process, with adequate notice and time to respond, and public meetings to discuss the implications of the listing for Okanagan communities; and
2. An economic analysis, conducted by the federal government, looking at how the SARA listing (and thus prohibitions on the milfoil control) will affect milfoil weed growth, impacts on water quality, beach access, tourism and other aspects of the Okanagan economy. As you have stated in your August 15 press release, decisions for listing include *“an evaluation of the potential socio-economic impacts on Canadians.”*

The Okanagan Basin Water Board would be pleased to assist in these efforts. We are strongly supportive of protecting species and habitats, and we believe that the best way to sustain healthy aquatic environments in the Okanagan is to take a balanced approach – allowing for control of damaging invasive species in high-value public areas as well as protecting habitat for RMRM. As such, we further request that:

3. The milfoil control program of the OBWB be formally authorized, on a permanent basis, under the terms of the Fisheries Act, Aquatic Invasive Species Regulations, Section 19 (2) (a) (iii) and (b) by your Ministry.

Specifically, this section of the Fisheries Act permits the Minister to take measures to control any aquatic species in a particular region or body of water frequented by fish where the aquatic species is not indigenous and may harm fish, fish habitat or the use of fish. References for this harm were included in our letter to you of April 24, 2019.

- Until the public consultation and further research can be conducted in order to make an evidence-based decision, we request your support to continue milfoil rototilling in all areas that have historically been treated using this method.
- Further, we ask that, regardless of future recordings of RMRM, we be permitted to continue to rototill milfoil in high public-use areas, ensuring that prohibitions do not continue to expand in future years.

We are happy to continue working with ministry staff at all levels of government and to continue to provide leadership on valley-wide water issues.

Sincerely,



Anna Warwick Sears, Executive Director  
Okanagan Basin Water Board

CC:

- Okanagan MPs: Mel Arnold, Stephen Fuhr, Dan Albas, Richard Cannings;
- MLAs: Eric Foster, Norm Letnick, Steve Thomson, Ben Stewart, Dan Ashton, Linda Larson, Jackie Tegart, Greg Kylo
- Chiefs Executive Council, Okanagan Nation Alliance;
- Regional District Chairs for North Okanagan, Central Okanagan, and Okanagan-Similkameen;
- Okanagan Municipalities;
- Okanagan Chambers of Commerce and Thompson Okanagan Tourism Association
- FLNRORD Thompson Okanagan Region, Ecosystems Section Head
- Hon. Minister Doug Donaldson, FLNRORD