

BC COALITION FOR FORESTRY REFORM

Submission to the BC Government's 2019 Review of the Forest and Range Practices Act

July, 2019

BCCFR.ORG

This submission has been approved by the BCCFR membership.

Background

The BC Coalition for Forestry Reform is a grassroots alliance of community-based associations advocating for culturally and ecologically sustainable forestry practices. The members of BCCFR support data-driven, long term stewardship of the timber and non-timber values of BC's forests. We advocate for:

- forest management based on long-term landscape-level planning,
- a mandatory shared decision-making process with local communities,
- careful incorporation of public needs and values, and
- full recognition of our forests' many non-timber values.

When evaluating non-timber values we must include:

- carbon sequestering,
- protecting watersheds, both as an integral part of the local ecosystem and for consumption by local communities,
- supporting wildlife,
- enabling both commercial and non-commercial tourism & recreation, and
- protecting and supporting the lifestyle and values of the residents and communities embedded within those forests.

The most up-to-date list of our member organizations and their respective websites is available on our members page located at: <https://bccfr.org/ccfrr-member-websites/>

At time of writing the BCCFR's membership includes:

- Apex Property Owners Association
- AJL Working Group
- Boundary Forest Watershed Stewardship Society
- BRVCA Valley Wide Forestry Committee
- Carmi Recreation Trails Group
- Friends of the Clinton Natural Forest Ecosystem and Watershed
- Friends of the Lardeau River
- Friends of the Seven Sisters
- Glade Watershed Protection Society
- Help Our Watersheds
- Juan de Fuca Forest Watch
- North Columbia Environmental Society
- Peachland Watershed Protection Alliance
- Shuswap Environmental Action Society
- Surge Narrows forest advisory committee
- Swansea Point Community Association
- The Upper Clearwater Referral Group
- Vancouver Island Water Watch Coalition
- Wildcraft Forest School
- Yalakom Forestry Committee
- Yellow Point Ecological Society

We recognize that natural pests, wildfire, and timber harvesting have drastically reduced the timber supply in BC. This has not just put economic pressure on the forest industry. It is well documented that this has negatively impacted a wide range of BC's non-timber values, including wildlife, water quality, tourism, and recreation. In recent years timber harvesting has become more frequent and extensive:

- throughout the watersheds supplying drinking water to our communities,
- in economically and socially important recreation and tourism areas, and
- much nearer to BC's communities with the subsequent impact on visual quality and property values.

Most members of BCCFR live in communities in which the forest industry is a contributor to the local economy. However, the majority of rural residents and BC communities simply do not fit the traditional narrative of being "resource dependent" let alone "forestry dependent." Times have changed. The economic and social diversification of rural BC is well underway.

The BCCFR membership asserts that it is not acceptable to allow the forest industry to continue to:

- dominate the provincial landscape unfettered,
- downplay the extensive negative impact on non-timber values, and
- ignore the extensive negative impact on the province's growing population of rural residents and communities.

Many rural communities benefit economically from the forest industry. However, we must not forget that rural communities are disproportionately burdened with the costs of the substantial negative economic and social externalities that road building and clearcut harvesting generate. Indeed, these costs are borne by many residents and communities that gain relatively small benefit from the forest industry.

A common concern among members of BCCFR is that there is no time to lose. Change must come quickly, before the damage to their community is irreparable. **Consider this: has any other BC industry spawned so many local organizations focused on one thing: fighting the negative impacts of clear cut harvesting on their communities?**

The core issue that BCCFR wants addressed in the next round of FRPA legislation and regulation updates is a simple one. Stop ignoring the negative impacts forestry is having on BC's communities, and stop ignoring the local residents who are bearing the costs of those impacts.

NECESSARY CHANGES TO FRPA

The BCCFR membership supports and commends the provincial government for launching this long-overdue analysis and corrections to BC's natural resource planning and governance. Our membership came together several years ago because of a shared belief that the previous system was fundamentally flawed in numerous ways. We note with enthusiasm the recent changes in professional governance (Bill 49), FRPA (Bill 21), and The Forest Amendment Act (Bill 22) are positive steps in reforming forestry management in BC.

We appreciate this opportunity to contribute to the public review of FRPA and once again commend the government in its ongoing inclusive public engagement process.

PART 1: WHAT OTHERS HAVE SAID THAT WE AGREE WITH

The BCCFR signed and agrees with the multi-party contribution submitted by Lisa Matthaus of Organizing for Change. We will not repeat the analysis and many recommendations made in that document.

The Forest Practices Board's June 2019 *Special Report 58: Tactical Forest Planning* is another excellent contribution that broadly covers many of the forest practices BCCFR has been advocating for. However, the report lacks sufficient details on what will be required to regain public trust in BC's resource management process. We will address that in the next section.

The BCCFR contributed to the public input process during the Professional Reliance Review. In that submission we proposed the following recommendations. Since these have not yet been put into effect we resubmit them here. We believe forestry and resource extraction governance, planning, and operational must take into account the following:

- Forest development must be managed according to publicly available, long-term, landscape-level planning, to include a mandatory shared decision-making process with local communities.
- Full recognition of the timber and non-timber values of our forests including water, wildlife habitat, biodiversity, tourism, and recreation.
- The restoration of clear government discretionary powers with regard to approval of logging plans and practices, including an improved Forest Practices Code and accompanying guidelines.
- Full recognition and guidance of forestry planning on the basis of scientific data. Full recognition, for example, of global warming and adjustment of forest policies accordingly.
- A vigilant monitoring system, well budgeted and independent of industry control, with particular attention given to riparian zones and roads.
- Staffing levels and budgets adequate to support the proposed changes.

NECESSARY CHANGES TO FRPA PART 2:

WHAT OTHERS MAY HAVE MISSED THAT MATTERS MOST TO BCCFR MEMBERS

1. When developing long-term land use and landscape level planning the process by which input is gathered, negotiated, and agreed upon is more important than ever before. Ideally all parties would gather together, discuss their respective goals and concerns, then negotiate a long-term agreement and strategic plan. However, representatives of local residents and communities are rarely invited to participate in the government-to-government negotiations that occur between the Provincial Government (as representative of the Crown) and Indigenous Governments. If those government-to-government negotiations occur BEFORE landscape level planning is performed, under what mandate and public guidance is the Crown negotiating with Indigenous Governments?

Substantial public involvement and agreement in landscape level planning must occur either in parallel with (indeed integrated with) the government-to-government negotiations, or must precede those negotiations. If public input is scheduled after the government-to-government negotiations are complete it will be seen for what it is: disingenuous. Put simply, local communities will not trust that the Crown is capable of understanding and protecting their unique local interests if those interests have not been thoroughly discussed and agreed upon first. Furthermore, it is good public policy that during any complex government-to-government negotiations the leadership of both governments frequently return to their constituents to formally discuss the proposed tradeoffs, and confirm their acceptability.

2. Many community members spent long hours in the LRMP process of the late 80's and early 90's, only to see those hard won plans shelved, or worse, given nominal status and then overridden by the "without unduly reducing the supply of timber from British Columbia's forests" clause. This one clause neutered any meaningful impact land-use planning might have achieved, and destroyed the trust of the very people most critical to its success - those with local interest and knowledge.

Therefore, it is not sufficient to say public input will be gathered and “considered”. To regain public trust in the process there must be real and tangible regulatory requirements that credible concerns raised by local stakeholders cannot be ignored by tenure holders, nor discounted by the statutory decision maker.

3. Many BCCFR members are local community groups that formed as a result of poor forestry practices in their communities. Although almost all of these groups have a strong bias toward protecting the environment and their local ecosystems, these community groups should not be confused with, nor automatically lumped in with, environmental non-government organizations (ENGOS). That is not to say ENGOS and the BCCFR membership are at odds with each other. Rather, their focus is different.

Local communities vary widely in how they frame and prioritize their concerns with local forest practices. Many are concerned about drinking water quality and the rising cost to local taxpayers of cleaning up what was once a pristine water supply. Others are concerned about the risk of extensive clearcut logging causing increased spring flooding for hundreds of kilometers downstream. Still others are concerned about the impact clearcutting is having on local lifestyles, outdoor recreation, tourism, and property values. Some community members also want to ensure a greater share of the economic benefits of industrial forestry remain in the communities closest to those forests, thereby at least partially offsetting the cost of the industry’s negative economic and social externalities.

When it comes time to organize landscape level planning, or tactical forestry planning, or FSP reviews there must be a place at the table for both ENGOS and community representatives. Even though both are concerned about non-timber values, one cannot always speak for the other.

4. Numerous local community groups have formed as a direct result of nearly two decades of provincial resource legislation that inadequately protected the interests of local communities. If FRPA modernization is successful the (unfortunately negative) driving force behind these groups will dissipate. That is a good thing! However, with that loss of motivation, it is natural for these groups to either disband or otherwise atrophy. It is only slightly facetious to ask, how will “local input” be efficiently gathered when the people who have been the driving force of that input are busy celebrating their new-found spare time and their more positive outlook on the future?

Therefore, for FRPA modernization to succeed there must be a conscious and concerted effort to implement a modern, efficient, and effective process by which local public input can be gathered. We must not assume “volunteer reliance” will be sufficient or automatic. Volunteers are a valuable and essential part of this so they must be nurtured, trained, and assisted. In March 2019 the University of Victoria’s Environmental Law Center published a briefing note titled “Key Elements of a Participant Funding Program for BC’s Environmental Assessment Act.” It does an excellent job of arguing for the importance of real and tangible support for community volunteers. Without additional funding, local governments cannot take on the task of gathering extensive local input. Furthermore, as they are typically structured, local governments are perhaps ill suited to the nuances and broad skills required. While updating FRPA, we must ensure local input is timely, accurate, high quality, and representative of community concerns. How that is achieved needs additional consideration and action throughout the FRPA updating process. To do otherwise is to discount the value and validity of local knowledge, and that is not the path to regaining public trust.

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