



Forest and Range Practices Act Submission

**Forest and Range Practice Act Discussion Paper Improvement Initiative:
Renewal and Resilience Ministry of Forests, Lands,
Natural Resource Operations and Rural Development**

The BC Wildlife Federation supports the government intention in the discussion paper to improve:

- Public Trust in Forest Management
- Framework for Landscape-Level Forest Planning
- Government Oversight over forest licences
- Linking to other environmental social and economic initiatives particularly those related to water and watershed sustainability

A summary the BC Wildlife Federation provided to the Select Standing Committee on Finances and Government relations in June 2019 recommended:

- Improve landscape level management of forest resources through the introduction of regional management planning to increase opportunities for collaboration with indigenous and non-indigenous communities;
- Establish objectives that support the sustainability and resilience for important forest values at the landscape level particularly, aquatic and terrestrial habitats and fish and wildlife populations.
- Ensure governments has the authority and capacity to manage B.C. public forest resources including the ability to evaluate revise and approve operational plans and requirements that require forest tenure holders to protect the environmental, social and cultural values.
- Increase public confidence in forest and range management by Increasing transparency and public access to forest management information. Ensure that Forest inventories and science are available to inform forest policy and management direction.

The following will expand on these points in response to the Discussion Paper.

Climate Change and Resilient Landscapes:

The question in the discussion paper is how should the Province identify opportunities and priorities for adapting forest management to a changing climate?

Many of the impacts of climate change have been exacerbated by the current focus on timber supply, silviculture and the short-sighted policy decision made with respect to beetle salvage. This has resulted in a short-term increase in the total harvest and a reduction in timber supply once salvage logging has been completed. This is leading to a shortage of timber to mills with layoffs particularly through the interior. Other forest values including landscape and watershed functioning have suffered including wildlife and recreation values. The percentage of clear-cut areas in many watersheds base resulted in record low flow, and high temperatures in streams affecting a variety of

environmental and economic values. These effects of overharvesting have been exacerbated by climate change and the large fires.

The ecological functioning of the forest landscapes should be a fundamental goal under the new FRPA in order to maintain diverse forest values. There must be opportunities for both indigenous and non-indigenous communities to provide direction in terms of plans and measures to achieve these goals on a landscape and tactical level including opportunities for stewardship of the resources including habitat and watershed restoration.

The forest planning operation to mitigate the risks of wildlife and the benefits to other resources is non-existent, particularly in the North Eastern part of the province. The ministry is risk adverse and unwilling to conduct proactive programs. Leadership in wildlife prevention is subordinate to wildfire response both in terms of investment and leadership.

Wildfire prevention, response and mitigation should be a provincial function that is strategically planned provincially and implemented tactically and consistently in various regions of the province with due consideration of landscape, forest and community values.

Landscape Level Planning:

The BC Wildlife Federation has long advocated for landscape level planning. This planning should include a range of landscape and watershed values that has community and First Nations Involvement and informed by inventory science and local information, including indigenous knowledge. It should produce a vision for the landscape in terms of what the future state should be, have clear and enforceable objectives for the values and be developed so there are clear and explicit trade-offs that are made. Arbitrary limits on the potential effects on timber supply should be removed in establishing forest objectives for a range of values including wildlife.

A process such as this should product a tactical plan that is adaptive in nature, that adjusts its approach as changing environmental, social and economic conditions warrant.

The BC Wildlife federation would like to be involved in the planning process both in terms of the framework developed provincially and implementation on a landscape scale.

In terms of resource road there needs to be an assessment and plan of how many roads/road densities are appropriate for a particular landscape. Roads now are approved on a site-specific basis not the ecological economic or social impacts on the landscapes or watershed they are in. Deactivation of roads is important in maintaining the functioning of terrestrial and aquatic habitat. Dealing with Resource Roads has been a major policy failure of the last two decades, not because of technical knowledge, but because of an inability to plan mange and deactivate them. This is an essential component of Landscape level planning.

Public Trust:

Public Engagement is required to gain public trust. The “Forest” Ministry and the forest sector have generally been reactive to public concerns and not proactive:

- Engage early not halfway through the process
- Engagement should cover not only biological and scientific, but also economic and social to ensure sustainability of populations and landscapes
- Engagement processes should respect traditional use of indigenous and non-indigenous communities
- Need for more public education outreach so different user groups better understand each other’s interests in the forest resource
- Engagement is about relationships that require the process and investment in getting people together in a meaningful fashion
- The engagement processes have to communicate with the public: What we heard, what we did about it, and how public participation feed into decision making?

Public Trust will increase if there is a clear line of accountability on decisions, and a mechanism to appeal, at the local level through the Regional Manager. Government needs to ensure decisions are made with the broadest base of public interest across the province.

Stewardship:

An ethic that embodies the responsible and balanced planning and management of resources. The concept can be applied to the environment, nature health property information and more. This definition is naked and isolated. There is a regulatory component to stewardship that government is responsible for in terms of legislation, regulation, monitoring and enforcement. There is also a non-regulatory component of stewardship that goes above that, in terms of how the public values the landscape, how they contribute to its well being and forest values by reducing their footprint on the landscapes and watersheds. This is currently a lost opportunity in terms of citizen science, protection and restoration.

The legislation should establish a 75 Million-dollar BC Watershed Sustainability Fund to support watershed stewardship groups, educational institutions, agricultural producers, industry, fisheries interests and others, alongside federal, provincial, First Nations and local governments focused on collaboratively protecting and maintaining the functioning of BC’s watersheds and landscapes. A Watershed Sustainability Fund would be a permanent fund to invest in initiatives and efforts that deliver long-term water and watershed sustainability across B.C. including:

- collaborative partnerships at the watershed scale;
- modernized watershed-based land-use plans;
- community-driven restoration initiatives, and;
- innovation supporting province-wide advancements in watershed/landscape protection.

The influence of climate change on the functioning of landscapes and watersheds will be profound. We also know that protection and investment now will be more effective in maintaining forest functioning and diversity now, rather than waiting for later. There is a direct line of site from an individual's carbon use and climate change. Investing in a long-term Watershed Sustainability Fund would be a measure in the renewal and resilience of British Columbia's terrestrial and aquatic forest resources.

Resource Values and Objectives:

The BC Wildlife Federation has long advocated a more comprehensive process for establishing objectives for landscapes and watersheds. We think that the process given the diversity of these in the province should be place based, community based and provide a long-term guidance what our landscapes should look like. Given the diversity of our landscapes and watersheds the following principles are recommended when setting wildlife and other landscape objectives:

- First, look at objectives and activities that increase resilience and adapt to climate change including managing to existing and emerging natural disturbance regimes.
- Provide connectivity to accommodate range shifts and adequate refugia.
- The objectives and standards should maintain and enhance ecosystem services, and particularly water quantity and quality.
- Establish clear and enforceable objectives for wildlife and habitat that support wildlife populations conservation as well as sustenance, recreation, commercial, spiritual and sustaining functions.
- Manage wildlife and habitat at multiple scales providing mix of single species, guilds and ecosystem planning and management to maintain abundant species and recover rare and endangered species that appropriate planning and restoring legacy impacts of past forest harvesting.
- The question posed in the discussion paper, "What additional values should be considered in FRPA that will allow us to manage forest and Range practices in a better way? There are some obvious ones including wildlife and water.
- The process for establishing values in legislation must be enabling to allow establishment at a landscape level and subsequently be evaluated and adapted and improved through the forest management process. Currently legislation is a barrier to consideration of new values as they currently are.

Oversite and Accountability:

The discussion question asks what ways should the province strengthen forest and range activities government oversight and industry accountabilities to better address the challenges of climate change and the interests of all British Columbians?

- Forest and range activities do not occur in a vacuum, they are influenced by a wide range of activities approved by other legislation administered by the ministry of Forest Lands and Natural Resource Operations.
- Consistency in approach to cumulative effects on landscape sustainability will be more important, particularly in the face of climate change.
- Increase the effectiveness of water and land management through the establishment and funding of an independent Natural Resources Practices Board.
- Reporting to the legislature that expands on the role of the existing Forest Practices Board to cover all legislation administered by the Ministry of Forests, Lands, Natural Resource Operations and Rural Development.
- Independent performance and compliance audits and reporting should be provided by the Natural Resources Practices Board to the public on key sustainability issues at a landscape and watershed scale to increase the effectiveness and performance of resource management in the province.
- Government should establish and fund a science secretariat to serve as a resource for research and knowledge to assist the Natural Resources Practices Board in collaboration with universities, technical colleges and private and public sector professionals with the required scientific expertise.