

## FRPA Phase II Changes - Boundary Forest Watershed Stewardship Society Submission

We are a non-profit, grassroots, citizens' society advocating for culturally, economically, and ecologically sustainable forestry practices in the forest and watershed of the Boundary Region. Our members have diverse backgrounds, interests and areas of expertise that include logging, government services, silviculture, fisheries, farming, advocacy, and environmentalism. Many have experienced the ravages of floods, fires, and drought first hand. All are deeply concerned about the looming threats of floods, wildfires and extended droughts with their evident increased intensity and frequency.

We have in common the recognition that our forests are in crisis and as a result there are, already, dire consequences to the humans, eco-systems, biodiversity, and wildlife of our region. In May 2018, as a result of climate change factors and deforestation in our watershed, the Kettle and Granby Rivers flooded suddenly causing extensive and severe damage to homes, farms, and rangeland. In Grand Forks and surrounding area, the flood damage was catastrophic. Less than 3 months later, the region was in extreme drought, a situation which lasted into late Autumn. 14 months later, the devastating impact of the flood continues to be felt economically, culturally, emotionally, and socially.

While abundant evidence in our watershed demonstrates the need for forest and ecosystem restoration, we believe there is a moral and fiscal imperative to shift forestry practices to a paradigm that treats forests as ecosystems rather than being driven by a paradigm that emphasizes growing timber – or to use industry speak, fibre – for mills. When getting logs to the mill as cheaply as possible is the name of the game, we, that is individuals, communities and all levels of government, are burdened with the costs that road building and clear-cut logging (and their aftermaths) generate. Clear-cuts can have an adverse effect on the environment, ecosystems, and biodiversity. Importantly, the rationale for prioritizing respectful management of ecosystems and biodiversity is environmentally, economically and socially prudent.

Therefore, we applaud the government's decision to provide the public with an opportunity to help re-shape forest policy. Changes to FRPA must reflect the urgent need to manage our water and, as much as possible, our climate.

We know that when left intact our older-aged forests manage our water and help protect us from climate extremes especially because of their carbon storage capacity. Clear-cutting and associated logging practices destroy the composition, structure, and natural function of forests including managing water and climate. New tree plantations struggle to establish themselves; whether or not they attain the status of a forest with all of the complex ecosystems they are comprised of is a question we won't know the answer to for a long, long time. Certainly, the current practise of 80-year rotations in our interior forest is foolhardy to say the least.

With these issues in mind, surely we are obligated to agree that forestry practices must focus on the resilience, renewal, and complexity of ecosystems rather than Allowable Annual Cut considerations.

*The overarching objective must be the fostering of ecological resilience and renewal.*

FRPA must contain a hierarchy of objectives that puts ecosystem restoration, structure, function, and composition as a top priority. Doing so recognizes that healthy ecosystems best ensure other objectives (social, economic, cultural, protection) can be met.

Reworking FRPA as quickly as possible is of paramount importance. British Columbians, who are entrusted with the care of our forests, will then have some assurance that the hard but necessary work can begin toward improving the ecological state of BC's forests and, significantly, toward expanding and diversifying the overall BC economy. Ecology and prosperity are of great importance. However, we emphasize that without a healthy ecology there will be neither long-term nor well-distributed economic prosperity.

In the next section we expand on 9 elements necessary to improve FRPA and ultimately the state of our forests, watersheds and the long-term health of British Columbia's economy. The nine elements are:

1. Defining sustainable & responsible forestry
2. Public trust
3. Government oversight
4. Monitoring, reporting, enforcement
5. Local employment
6. Landscape level planning & citizen involvement
7. Ecosystem values
8. Independent science council
9. Climate crisis

## 1. DEFINING SUSTAINABLE & RESPONSIBLE FORESTRY

In recent webinars about FRPA changes, government staff used the words 'sustainable' and 'responsible forestry' but stated that FRPA does not include definitions of these terms. Policy must define and quantify these words in ecological terms so that they are not misused to serve a desire to 'green-wash' for-profit activities by the timber industry or anyone else for that matter.

⇒ **We propose** the term sustainable must be based on ecological considerations and be given scientific, quantifiable limits. If there are no limits, it will lead to the decline of our ecosystems and the consequential decline of our economy. A definition of sustainability must consider:

- the ability of a biological system to remain diverse and productive over time; the maintenance of natural processes; long-lived healthy wetlands; maintaining functional ability to manage water and climate; ecosystem resilience and renewal; the structure, composition, and function of intact forests; the limited carrying capacity of the ecosystems that support us; that the climate and landscape are in constant flux; the capacity to sustain long term benefits.

⇒ **We propose** the term "responsible forestry" is also scientific, quantifiable, and based on ecosystem resilience and renewal.

## 2. PUBLIC TRUST

Public trust is weakened when government policy and papers discuss ecosystem principles but fail to put them into practice. It is critical that policy protects ecosystems and the public interest in practice, that is, in our forests.

Communities have a right to expect clear, scientifically justifiable, ecologically sound answers to the following questions regarding logging in their regions:

- *what is going to happen?*
- *why will it happen and under what conditions?*
- *when and where will it happen?*
- *what are the consequences of it happening?*
- *who will be affected?*
- *how uncertain are we?*

Therefore, policy must entail:

- Public oversight that is formalized, systematized and meaningful
- Accountability
- Enforceable objectives that are achieved on the ground
- Transparency

⇒ **We support the following specific amendments (proposed in the Joint ENGO submission to FRPA):**

1. Require licensees to provide sufficient information for provincial decision-makers to evaluate operational plans and proposed forest operations for consistency with legal objectives and approval tests. Require decision-makers to provide a publicly available, written rationale and supporting data for decisions that addresses public comment.
2. Provide meaningful and timely opportunities for public engagement at all levels of forest planning, including making publicly available information such as surveys, assessments and studies relied on by licensees to demonstrate consistency with government objectives, approval tests and statutory requirements. Require licensees and provincial decision-makers to demonstrate how public comment informed proposed plans, operations and approval decisions.

### **3. GOVERNMENT OVERSIGHT**

Currently, public oversight is minimal at best. We support the elimination of Professional Reliance and a move to public oversight. Responsibility for this oversight must be given to an **independent council of technical experts** which reports regularly to the government and the public. Also, Provincial decision makers must be given the authority to ensure forestry plans and roads are consistent with ecosystem resilience and renewal.

⇒ **We support** the full implementation of all FRPA related recommendations in the 2018 Professional Reliance Review.

### **4. MONITORING, REPORTING, ENFORCEMENT**

Protection of public interests will require a vigilant monitoring, reporting, and enforcement system that is well-budgeted and independent of industry control with particular attention given to riparian zones, roads, and water.

⇒ **We propose the following are all clearly reflected in FRPA:**

- Local government offices, preferably local Forest Service offices, must be well-staffed and budgeted. (We note that the move to centralization and down-sizing of the BC Forest Service has resulted in minimal oversight of forestry activities and practices.)
- Reporting must emphasize ‘the state of the ecosystem’ rather than ‘amount of harvesting’.
- Road building: policy must mandate (and make enforceable) targets that set standards for road building and maintenance, that minimize road building, that set out road mitigation requirements, and restore the ecosystem function of roads quickly after logging.

## 5. LOCAL EMPLOYMENT

⇒ Although local employment is likely not among the terms of reference for FRPA legislation, we encourage policy makers to keep in mind the following thoughts.

Business as usual means diminishing returns for biodiversity, wood production, and our community. As ecological economist Herman Daly says, “What use is a sawmill without a forest?”<sup>1</sup>

Innovation, not the status-quo, is required to provide stability for communities long dependent on our current and increasingly evident unsustainable ‘forestry’ model. Economic diversification and a movement away from our over-reliance on our forests as primarily a source of fibre must be a priority to protect our rural and urban economies.

## 6. LANDSCAPE LEVEL PLANNING & CITIZEN INVOLVEMENT

FRPA must protect the interests of local communities.

Forest development must be managed according to publicly available, long-term, landscape level planning which includes a mandatory shared decision-making process with local communities.

During the development of landscape level plans, while input is being gathered and while the Crown and Indigenous groups are negotiating, there also needs to be opportunities for all parties (including local communities) to gather and discuss their goals and concerns. Substantial public involvement in landscape level planning must occur in parallel with or integrated with the government-to-government negotiations (Crown & Indigenous) or must precede these negotiations.

Each region of BC is different. Therefore, landscape level planning should be multi-interest (including ENGOs, community groups, local governments, Indigenous groups). How local input will be gathered, acted upon, and enforced is an essential part of policy. Thought must be given as to how to make local input valuable and accurate during planning processes. A framework must be put in place for this to occur.

⇒ **We support** the Forest Practices Board’s recommendations, in *Tactical Forest Planning: The Missing Link June 2019*, where it sets out comprehensive tactical forest planning that provides for meaningful consultation with stakeholders and the public, an interaction of a social process and a technical process, and considers forest resources at appropriate scales.

## 7. ECOSYSTEM VALUES

⇒ **We propose the following:**

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<sup>1</sup> Daly, H & J. Cobb (1989) For the Common Good: Redirecting the Economy Toward Community, the Environment and a Sustainable Future.

- Legal objectives must prioritize protection of ecosystem values over timber extraction. Harvesting should be last on the list of what is protected and only occur if all other environmental values can be met. Before conventional timber supply planning occurs and before operational issues at the site level are addressed, ensure that short and long-term resilience and renewal patterns and processes are assessed, planned, and managed at the ecoregion (policy) and landscape (watershed) level.
- Remove the constraint “without unduly reducing the supply of timber from British Columbia's forests” from all FRPA legal objectives and from the Government Actions Regulation. Add the constraint “without unduly reducing the resilience of ecosystems” to timber and other ‘use’ objectives.
- Ecosystem values that must be explicitly prioritized as FRPA objectives:
  - Water management
    - Safeguard our water resources. Recognize that intact forests manage our water for us
    - Mandate that forest practices manage water quality, quantity, and timing of flow. (Timing of flow was a big problem in the Grand Forks flood in May 2018).
    - Protecting source drinking water
    - Give special designation and protection to community watersheds
  - Soil health
  - Biodiversity - Policy must maintain the full complement of existing species and manage for the long-term persistence of species and gene pools; recognize the role deciduous species play in fire protection and ecosystem resilience.
  - Wildlife habitat
  - Riparian environments
  - Human health
  - Mature forests
    - Maintain sufficient stands of old growth because they moderate temperatures and manage water better than other stands
    - 300 to 500-year cycles must be taken into consideration. The lifecycle of political parties and their governments are short lived relative to forests. Forest management must come out of the political realm and be based on biological factors
    - Old growth biodiversity cannot be duplicated in 80-120-year forest rotations. Old growth forests take much longer to evolve.
  - Resilience = how an ecosystem copes with disturbances and restores itself

Provide statutory decision makers with the authority to disallow logging activities in **high risk ecosystems** (these ecosystems would be identified by the Independent Science Council – see below).

## 8. INDEPENDENT SCIENCE COUNCIL

All forestry decision-making should be based on peer-reviewed science using an ecosystem-based approach rather than mathematics based on harvesting volumes.

⇒ **We propose** the activation of an Independent Forest Council/Science Council that provides good science in order to guide local on-the-ground decisions that utilize and conserve all forest resources.

This Council would also be responsible for evaluating, monitoring, reporting, and recommending ecosystem and biodiversity targets.

## **9. CLIMATE CRISIS**

Current policy exacerbates climate crisis events as we have seen first-hand in Grand Forks. Make the climate crisis a top priority. Healthy forests help protect us from climate extremes. In order to fulfill this function, they must remain intact. Current logging practices destroy the composition, structure, and function of forests and their ability to manage water and climate. Once a forest has been clear-cut, it will never have the same capability. Stop dismantling forests, start restoring them, and protect the public of BC in this manner.

⇒ **We insist that:**

- Forest policy must recognize and immediately act on the climate crisis by addressing drought, fires, severe wind events, floods, landslides, and problems with regrowth in harvested stands.
- Production and consumption must be limited by an ecosystem's capacity to manage climate.
- Policy and operations must recognize that intact forests manage the climate for us and clear-cut logging interferes with this.

**Thank you for the opportunity to provide input on this critical piece of BC forestry legislation.**

**Respectfully submitted,**

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