

Glade Watershed Protection Society

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From the *govTogetherBC* page, this is how FRPA is described: The *Forest and Range Practices Act* (FRPA) governs the sustainable management of B.C.'s public forest and range resources. It covers planning and practices that protect environmental resources and public safety ...public oversight and administrative fairness for those who hold rights to forest and range resources. Etc.

This is how we, as stakeholders who are trying to use it within the confines of industry practices would describe FRPA:

- it does not help to 'sustainably manage '
- it does provide and protect the timber industry
- it is extremely limited in scope
- it does not inform best practices or best science
- it does not protect:
 - soils
 - wildlife
 - water, fish, wildlife and biodiversity within riparian areas
 - fish habitat in fisheries sensitive watersheds
 - water in community watersheds
 - landscape level wildlife and biodiversity
 - stand level wildlife and biodiversity
 - visual quality
 - cultural heritage resources
- it does not promote sustainability
- it does not consider climate change
- it does not consider cumulative effects

The government is doing a lot of busy work lately, but none of the tweaks they are suggesting as changes to FRPA will mean much at all unless the following clause is changed or removed so that all these values stand on equal footing with timber.

All objectives set by government relating to protection of non-timber values apply 'only to the extent that it does not unduly reduce the supply of timber from British Columbia's forests.'" Forest and Range Practices Act, Forest Planning & Practices Regulation [Feb 2016].

In addition, accepted best science needs to be included in FRPA. For example, the standard of slash burning and clear cutting, both motivated by monetary values needs to be changed to encourage a world-friendly, carbon reduced planning process.

Thank you,

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