



Guide Outfitters Association of British Columbia

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ENGAGEMENT SUBMISSION –FRPA Improvement Initiative

Forest and Range Practices Act Improvement Initiative: Renewal and Resilience

- FRPA was originally a minimum standard for forest companies to surpass. This did not happen, and other values have suffered immensely for it.
- FRPA is the one piece of legislation that has the most influence on large scale anthropogenic disturbances on the landscape, yet it only truly manages for one value: timber.
 - It actually weighs fish, wildlife and habitat against their impact to the timber supply thus creating a two-tier system of resource management where every value is a far distant second to timber.
 - The public needs to realize that outside of private land and parks FRPA in its current state allows for the rest of the forested landbase to be harvested and then replanted back as a high-density tree farm.
 - In most cases wildlife habitat is only given a 1% impact to the timber supply in timber supply reviews and the development of Wildlife Habitat Areas and Ungulate Winter Ranges.
- FRPA influences wildlife and habitat more than the Wildlife Act. Regarding wildlife, habitat and the maintenance of other values on the landscape FRPA has been a complete failure. Assign a value to wildlife so they are much more than just a condition for forest companies.
- Healthy forests are a biodiverse, functioning range of natural vegetation at various seral stages throughout the ecosystem. This type of diversity meets the needs of a broad range of wildlife species and produces a variety of ecosystem services including water and air purification, nutrient cycling, carbon storage, climate regulation and wildfire suppression. Factors specific to wildlife habitat include snow interception and the provided connectivity between habitat blocks.

PROPOSED CHANGES

Government states that they are proposing changes to improve FRPA in order to:

- Clarify government's objectives for forest and range resources
- Improve information sharing in forest planning
- Ensure those who manage forest and range resources on the ground are accountable for achieving desired outcomes
- Increase opportunities for communities to engage in the planning process

1. Gaining the Public's Trust in Forest Management

- Proper information should be provided with this engagement. It would have helped to gain the public's trust if maps showing TSAs and the current and permitted level of disturbance vs. the THLB were included in the engagement package. The general public does not understand the current state of BC's once pristine landbase.

- Forest act should be reviewed as well if the public’s trust is to be re-gained. The forest and FRPA are integral to each other and to enact meaningful change, the forest act needs changes as well.
 - Ex. Timber supply reviews, setting the AAC, cut control, unduly impacting timber supply.
- Why a two-year delay in implementing landscape level planning process?
 - Landscape level plans take a lot of time and effort to do well. The process should be started now not two years from now.
- It is hard for the public to trust forest management when licensees sluffed off the Chief Forester’s expectation letters as “non legal” guidance and did not follow them.
- Why do forest licensees not have to follow the Migratory Bird Act when other industries on the same landbase do?
- The forest practices board needs to be more than just a review panel that makes suggestions for better management. They need to have the power to pass judgement, enforce decisions and implement serious penalties when necessary.
- Cutting permit process needs to change. Right now, a cutting permit is a done deal and the District Manger doesn’t even see the site plan! The District Manager needs the ability to decline cutting permit applications.
 - Along with this authority the District Manager needs proper legislative guidance to support his decisions when they do not favor a licensee.
- A significant percentage of foresters in this province have not practiced forestry outside of pine salvage. There needs to be a fundamental shift in the forest harvest practices post pine beetle salvage logging.
 - For example:
 - Why are new post salvage blocks being designed without adjacency rules?
 - Why is 40% + waste acceptable when blocks are logged?
 - Why are cutting permits issued so quickly?
 - Why are stakeholders often first notified of harvesting after permits are approved?
- Landscape-level planning needs to be long-term, including a sound demonstration of how the land will be responsibly managed over the long term. If a licensee cannot demonstrate a responsible long-term harvesting plan, then permits should not be issued. Landscape level planning cannot be achieved if we continue to plan no further than site level cutting permits.
- Currently it is up to the licensee to decide how, when and where they a harvest a public resource. You cannot maintain public trust in that format. We need to decide what landscape-level planning looks like with due consideration to all values on the landscape.
- All tenure holders must have a meaningful say in the planning of proposed forest operations. Tenure holders should have more say than the general public.
- Landscape level planning is not just consulting stakeholders, checking a box and then going away, deciding what is best for them and then notifying them once a permit has been issued.
- Professional reliance is subjective and up to the individual forester (who often never even visits the cut-clocks they sign off on.) The whole framework needs to have more accountability.
- All industries operate on the same landbase yet there is a higher threshold for all other sectors; they must go through the Environmental Assessment Office – the forest industry does not.
- Forestry schools and the ABCPF have done a poor job in educating foresters to manage for values outside of timber and for other tenure holders. For example, many RPFs do not even know about guide outfitters, yet their actions directly impact them and other tenure holders. The BC government needs to apply pressure on the ABCPF to increase their standards in this regard.

2. Introducing a Framework for Landscape-level Forest Planning

- Forest Stewardship Plans are not a landscape level planning tool.
- Multiple licensees operating within the same area on volume-based tenures does not work as there is no higher-level plan to align their activities, rather they compete for the resource.
- Better planning would be achieved with area-based tenures.
- Currently, planning is left up to RPFs who are desperately trying to find fiber for their respective employers. Without the planning component we're just playing triage on the landscape and it becomes a race to cutting permit– it all comes down to the landscape-level planning framework.
- The proposed changes to FRPA, Professional Reliance, and caribou issues have caused licensees to increase their forest development efforts. i.e. get blocks to permit before any meaningful change happens.
- Why is the Forest Act not being looked at?
- Landscape level plans need to be linked to the timber supply review process so that the AAC outcome is realistic for considering and maintaining all values. Current TSRs do not give enough weight to non-timber values.
- Need to change “unduly reduce timber supply” otherwise even with a landscape level planning process it will be a two-tier system where one value trumps all others in legislation.
- There are several processes underway right now that overlap each other for example: Improving Wildlife Management in BC. The processes need to align where necessary as landscape level planning should integrate wildlife and habitat objectives set by wildlife stakeholders and not just RPFs deciding how best to manage for wildlife.

3. Strengthening the Ability of Government to Oversee Forest and Range Practices

- Rural communities need a sustainable forest industry, more than anyone. FRPA has allowed free reign to licensees to manage our land as they see fit. Forestry dependent communities are starting to suffer as a result.
 - Cut control should be re-visited. Allowing licensees to go over annual cuts only benefits licensees and ultimately hurts communities.
- The forest industry is acting like a bully to all other industries. They have immense legislative power and are not afraid to use it to their benefit.
- Government doesn't think long term; they think in short cycles, heavily influenced by the licensees who hold the power.
- In reality, other values are non-existent other than fiber supply because of the “Unduly reduce fiber supply” legislation.
- Five-year development plans are needed and should be a requirement for any forest tenure to begin operating.
- There is no balance between competing interests and resolving conflicts is non-existent.
- We have a fiber-centric society; very little value for any values other than fiber.
- Governments always bend to the demands of the forest industry.
- BC is moving from forests to plantations; 1400-1600 stems per hectare is not a healthy forest
- Most people don't know how bad it has gotten – it's the best kept secret in the province.

DISCUSSION QUESTIONS

1. Climate Change and Resilient Landscapes

- **How should the Province identify opportunities and priorities for adapting forest management to a changing climate, such as mitigating the effects of beetle infestations, drought and fire?**
 - Pine plantations are more susceptible to wildfire. More deciduous is required in our forests!
 - Prescribed fire to actively reduce the risk of wildfire and promote wildlife habitat
 - Predictive mapping on ecological makeup based on changes made by insect epidemics, wildfire, drought, etc.
 - Ecological connective mapping to identify corridors and zones for assisting in the migration of plant communities and wildlife
 - Matching species to the new biogeoclimatic reality
 - Leave zones to evolve on their own (including areas of old growth)
 - Allow for more natural regeneration of cutblocks.
 - Better use of leftover fiber in cutblocks. Currently there is massive waste that could be utilized, creating more jobs and reducing the need for more cutblocks.

- **What factors should be considered in the planning of forest operations to reduce the risks of wildfire around your community?**
 - No more processing at the stump. Current fuel loading increases fire risk. All processing should be done at the roadside, where it can be gathered up and burned, eliminating the high level of fuel currently being left behind.
 - Change to free growing legislation to allow for more deciduous – 5% deciduous is not enough.
 - Move away from a pine monoculture and max stems per hectare thinking.
 - Wildfire should reduce the annual allowable cut
 - Support a sustainable forest industry. At current harvest levels, it is not sustainable. AAC was increased because of pine beetle salvage. Everyone expects a much lower AAC.
 - Apply recommendations from the Filmon report (Firestorm 2003)
 - Fire experts must be included to influence and participate in land management planning
 - Assess fire-prone ecosystems for risk reduction
 - Allow mixed deciduous forests grow to maturity in fire-prone areas
 - Plant natural fire barriers
 - Do not allow forest stands to grow right up to communities
 - Manage and eliminate fuel buildup, especially in interface and park areas
 - Incentivize tenure holders to engage in proactive fuel reduction and fire management
 - Increase the number of prescribed burns

2. Landscape Level Planning

- **A vital step in landscape-level planning is understanding what is important to the public. Based on what is important to you or your community, what information on the condition of resource values (such as species-at-risk habitat) do you think is necessary to support the planning process?**
 - There needs to be a fundamental shift in forest management – from fiber management to integrated ecosystem management
 - Forest resources must be used in a balanced way, by all resources, both consumptive and non-consumptive.
 - Forests are managed for ecological integrity for multiple economic, social and cultural benefits including forestry, tourism, botanical (commercial and personal) recreation and culture.
 - Forestry – although a critical pillar of BC’s economy – must not trump all other values and resources.
 - Include all uses of the forest landscape – not just AAC and mill quotas
 - All values must be identified and incorporated, including environmental, economic, social and cultural importance, recognizing BC’s diversity and the various values at different levels, be it provincial, regional, or local.
 - Environmental values essential to ecosystem function are identified and managed, irrespective of previously set harvest quota
 - The requirements surrounding “Not unduly reducing the fiber supply” stops the consideration for the other values.
 - The 11 resource values are conditions – things that are met; they are not actually values.
 - It is critical that other values are considered on the landscape
 - There must be a higher value given to wildlife. The current 1% requirement is inadequate.

- **How would you like to be involved in the planning process?**
 - Site plans shared with tenure holders.
 - All tenure holders must have a meaningful say in the planning of proposed forest operations. There needs to be higher levels of consultation with tenure holders with shared land base.
 - Need 5-year development plans.

- **Resource roads are an asset in the province as they provide access for the forest industry, ranchers, other resource users, and the public for commercial and recreation purposes. Yet, these same road networks are costly to maintain and have potential negative impacts on wildlife, water quality and fish habitat. What values do you believe are important to consider when planning new roads, road use and maintenance, and deactivation in your area?**
 - Planning must be done with environmental, economic, social and cultural values in mind.
 - Environmental: Wildlife, ecological sensitivity, connectivity, road density
 - Economic: Forestry and other economic uses such as tourism, for existing and future developments
 - Social/Cultural: Public recreation, traditional and historical uses

- There must be a maximum road density. For each kilometer built, a kilometer must be reclaimed.
- Deactivate in-block roads
- There is a road threshold for caribou is – 0.6 km/km²
- If we focus on density, the decision of which road is deactivated can take place locally.
- Deactivation is not a ditch at the head of the road with a sign. It must be reclaimed so that it restricts predator movement. (Replanted with moose browse, etc.)

3. Public Trust

- **How can the Province improve transparency and timelines of information regarding proposed operational and landscape-level activities, plans and results?**
 - Share site plans/consult with tenure holders
- **What information will help inform your feedback on plans that may impact you, your community, or your business (e.g., maps of cutblocks and roads planned in your area, hydrological assessments, wildlife habitat areas or recreation opportunities, etc.)?**
 - Public must have access to proposed operational plans and maps, including cutblock and road locations and schedules.
 - There needs to be a much higher level of consultation for tenure holders
 - If volume is traded, the agreements made with tenure holders must be included with the transfer.
 - All significant environmental, economic, social and cultural values need to be identified, mapped, and a value assigned from a local, regional and provincial perspective.
 - Research should be focused on assessing the significance of all resource values on the bases of provincial, regional and local scale.

4. Resource Values and Objectives

- **What additional values should be considered in FRPA that will allow us to manage forest and range practices in a better way?**
 - Add tourism as a FRPA value
 - The values are mutually conflicting.
 - Based on what we're seeing in practice, the only value that government cares about is timber.
 - Planning must be done with environmental, economic, social and cultural values in mind.
 - Environmental: Wildlife, ecological sensitivity, connectivity, road density
 - Economic: Forestry and other economic uses such as tourism, for existing and future developments
 - Social/Cultural: Public recreation, traditional and historical uses
 - Forests are managed for ecological integrity for multiple economic, social and cultural benefits including forestry, tourism, botanical (commercial and personal) recreation and culture.

5. Oversight and Accountability

- **In what ways should the Province strengthen government oversight and industry accountability regarding forest and range activities to better address the challenges of climate change and the interests of all British Columbians?**
 - In general, foresters have proven that they are good at managing for timber, but poor at managing for wildlife and other values. Biologists are not involved in the process anymore. Because of professional reliance, foresters are making these evaluations on behalf of the biologists. For example: Foresters will develop a previously untouched drainage and decide what is best for wildlife themselves based on their own discretion using an Act that weighs timber values higher than wildlife as guidance. In reality, the “assessments” are being done by entry-level personnel, who are primarily focused on laying out cut blocks.
 - Why is the forestry industry not held accountable as strictly as the mining industry? The forest industry must go through the Environmental Assessment Office.
 - Again, the public has no idea that this is not happening. They are not aware that the forest industry is not following any environmental assessment practice.
 - There must be a larger percentage of forests left for wildlife. The 1% impact to the THLB for wildlife is not legislated anymore yet it is still used as the standard by regional managers when creating UWRs etc.
As fires reduce the available supply, what is the mechanism for reducing the AAC accordingly? As with other tenure holders operating on the land base, forest licensees should have their quotas reduced based on forest fires.
 - Provide the Forest Practice Board the ability to write orders and levy fines.
 - The forest industry is not growing forests – they are making plantations.
 - Free growing legislation makes a poor incentive. I.e., use of glyphosate. At one time, thalidomide and asbestos were believed to be safe. The forest industry knows better and must do better.
 - Forest licensees should be incentivized to do what’s best for the entire ecosystem, including access to other values on the land
 - Regulatory language the requires independent decision makers to make choices based upon the highest and best use of forest resources on an integrated management basis.
 - First and foremost, forest management should protect the ecological integrity of the forest, while making balanced provisions for economic, social and cultural considerations.