

## **Submission by the Yalakom Valley Forestry Committee in Response to BC Government's Call for Public Input towards Changes in the FRPA, 2019**

The Yalakom Valley Forestry Committee is represented below. But this Committee is only the latest character in the valley's forestry experience. Our people have been involved in forestry issues – in defence of their home place – since the eighties of the last century, and will no doubt continue for generations to come. We've sat on every available land-and-resource-use-planning table, bringing knowledge and education of place that would have been lacking without our presence. At the short-lived Yalakom Valley LRMP, the Ministry of Forests had virtually no detail on the map to apprise an interested party what existed on the ground. We were astonished. And that was in the days when there was a Ministry office in nearby Lillooet. In those days – and this is almost a joke – when at the table we spoke of Ecology, the district manager, in an indignant voice, inquired, “And what is Ecology!?” This is the kind of bureaucratic authority we were facing.

In the late nineties, we undertook an Ecosystem-based Landscape Analysis of the whole Yalakom Valley, carried out by the Silva Foundation. More recently we had an Initial Landscape and Stand Ecosystem-based analysis done by the master forester, Herb Hammond, after logging was proposed in Buck Creek, one of our most important community creeksheds. There were also a number of hydrological assessments done on Buck Creek. It would be tedious to list all the actions we have undertaken to defend our place historically, including many that have been paid for out of our own pockets.

Our most recent encounter with the local logging company has been continuous and intense. But throughout all these experiences, one element stands out among all the others, and that is the imbalance of power between us local people and the logging company that comes into our home region with plans to clearcut our hillsides. This imbalance – the great power on the part of the company and the puny power of the people at the planning table – is profoundly disturbing. (This is only one reason we have been so adamantly opposed to Professional Reliance.) The feeling is one of being invaded by a colonizing force. No amount of rational discussion will move a logging company to undertake ecology-based cutting plans. A logging company's only interest is profit. And perhaps this is the heart of the matter, and not alone that we suffer an imbalance of power.

In any case, we have signed on to the joint ENGO submission regarding the Discussion Paper on FRPA, where many of the problems and solutions to problems in forestry are laid out. The following series of responses to your public inquiry will be a matter of adding emphasis and a few differences that might have not arisen in the ENGO submission.

**Immediate Response to Climate Emergency.** The Canadian House of Commons has declared a Climate Emergency. Let's not call for any further public input while this emergency continues. In emergency, you act. You act on the best knowledge you have. And radical action is required, as in wartime. You will find below some of our suggestions for a new emergency-influenced forest policy:

**Professional Reliance.** As far as sustainable forestry is concerned, the Professional Reliance Model instituted by the neo-liberal government to carry out the FRPA has been a complete failure. The current NDP government has begrudgingly acknowledged the fact. Mark Haddock of the Forestry Practices Board was appointed to look into the matter. He came up with 122 recommendations for improvement. The joint ENGO submission advised that all 122 recommendations be implemented. Better, we say, scrap the Professional Reliance Model altogether. Start out approaching sustainable forestry from an entirely different angle.

**BC Ministry of Forests and BC Forest Service.** To make a fresh start with an emergency-influenced FRPA, we recommend the BC Ministry of Forests and BC Forest Service be re-established, and this time with clear, unfettered authority over public forest land-use planning, with a renewed body of bold regulations, including a revamped Forest Practices Code with accompanying Guidelines charged by the current unprecedented crisis.

**Public Participation.** The BC forests are not owned by industry, despite the near privatization within tenures instituted by the neo-liberal party – giveaways to industry – during the past fifteen or more years. When people locally object to logging plans, they discover there is no effective authority to which they can effectively appeal. Neither Compliance and Enforcement nor the Forest Practices Board can be of help, for the damage is already done (thanks to Results Based Forestry). To counteract this problem, we suggest that forest management start with landscape level plans, fully available for public review and which have already embodied public interests and values. Such “higher level” plans might be jointly developed by the Ministry of Forests along with a newly-established Ministry of Environment. The higher level plans must include a *legislated right of participation* by local communities and rural residents.

This change, as well as others will mean removing the “constraint” clause from the FRPA and from Government Actions Regulation that stipulate changes can be made in logging plans or policies but only “without unduly reducing the supply of timber from British Columbia’s forest.” This has all along been nothing but an odious absurdity. What could be more contradictory to the ideal of developing adaptive change to forest policy?

**Non-timber Values.** As everyone knows, there is more to a forest than “stems” for the mill. Among forest services, timber is not even the most important. To repeat what has become a cliché, the Yalakom Forestry Committee calls for *full* recognition of *all* forest values, including water, wildlife habitat, biodiversity, tourism and recreation. And we now add to the list of values the *sequestration of carbon*, for forests are the principal land-based sink of carbon on the planet and it is madness to destroy them.

**Water.** Water in a time of global warming becomes a leading issue. As a result of decades of mismanagement, there is today a scarcity of operable (profitable) forest sites. Consequently, logging companies are entering drinking watersheds (or what are sometimes called “consumptive use watersheds”). Everywhere in BC people fear the reduction of their water supply that forests nurture and maintain. It’s time to call an immediate moratorium on logging that might endanger drinking watersheds.

**The Annual Allowable Cut.** The annual allowable cut has for years been hugely inaccurate, what with analytic techniques for assessment of timber supply that are necessarily oversimplified and inadequately ground-checked. Greatly contributing to the falsification is the

manipulated data supplied to a complicit ministry by logging companies. Another unacceptable fact is that the AAC is calculated on the basis of the wood delivered to the mill, while the wood left behind in scrapheaps is often thirty percent or more of the wood originally grown on site. We advise that all trees *in situ* enter into the calculations of the AAC.

In addition, we strongly recommend that from now on there be no slash burning, which only adds to the unleashing of enormous amounts of carbon caused by logging operations. Rather than burning the piles (eliminating evidence of prodigious waste), logging companies should be required to find productive use for all wood in the forest.

**Old Growth.** There should be no more logging of old growth. The stripping of old growth on the coast of Vancouver Island is especially damaging. A recent article by Briony Penn in *Focus Magazine* informs us that the last two years have been record years for exporting raw logs, amounting to 8 million cubic metres per year, equivalent to full logging trucks lined up bumper to bumper from BC to Montreal! Old growth is indispensable to values of biodiversity and the sequestration of carbon.

**Acknowledgement of forest related scientific data.** All forest planning should be conducted on the basis of scientific data. This means that the Forest Service requires the restoration of a well-budgeted staff of scientists and researchers continuously engaged in improving the results of the new regulations in forest management. They will be kept busy tracking the success of the upcoming changes to FRPA and the Forest Practices Code. A vigilant monitoring system will be imperative, independent of the logging industry, as stated above.

**First Nations.** We wish to acknowledge fully the need for First Nations to be involved in creation of forest policy and implementation in their Territories. An active partnership with local residents would be ideal. How this can actually take place is not clear and we are in hopes the new government will give the issue thoughtful consideration.

**Tenure.** Here is a last radical suggestion, which is unlikely to be adopted but which warrants consideration in a climate emergency. To further insure government's independent control of the forest industry, why not revamp the entire system of tenure for logging companies, and turn the direction of logging plans over to the Forest Service as practiced in the United States? The US has a system where the Forest Service does all of the planning, including layout of how timber extraction should occur, i.e. roads, block boundaries, marking for partial cutting. Then the timber is auctioned to the highest bidder. That is exactly what results in a real log market and what the US would like Canada to do. Instead we have a perversely subsidized stumpage system that has no resemblance to a real log market.

**Forest Restoration.** All of the above falls under the over-arching call for a Policy of Restoration to be promptly undertaken by the NDP government.

Thank you for the opportunity to voice our opinions.

Van Andruss, on behalf of The Yalakom Valley Forestry Committee      July 14, 2019