

VIA EMAIL

July 15, 2019

Hon. Doug Donaldson
Minister of Forests, Lands and Natural Resource Operations and Rural Development
PO Box 9049, STN PROV GOVT.
Victoria BC
V8W 9E2

Dear Minister Donaldson,

Tolko writes to you to share our thoughts on the Forest and Range Practices Act improvement initiative currently underway in the province. This letter provides general comments and specific recommendations regarding future regulatory changes.

We are a private forest company with operations in the southern interior of province as well as Alberta, Saskatchewan and the southern USA. We are very aware of the challenges and opportunities that forest land management and the ensuing regulatory framework place on the forest sector, forest professionals and the province. Tolko commends the efforts of the government to work constructively to enhance the Forests and Range Planning regulatory framework.

We strongly support clarifying and formalizing government objectives for forest and range resources. This will provide more certainty for our company, employees, contractors and communities.

Tolko welcomes any improvement to the planning framework in British Columbia that facilitates Indigenous people's ability to assess land management decisions. These decisions include Timber Supply Analysis over multiple decades and the operational plans governed under FRPA legislation and regulations.

Improving public trust is an ongoing opportunity that must include an indigenous revenue sharing model, active management of the forest landscape to avoid large scale disturbances such as insects and wildfire by mimicking nature (Natural Range of Variability) and enabling the Abbott and Chapman report recommendation for community protection values in the Wildland Urban Interface.

Timber Supply Review

Spatializing Timber Supply Reviews will improve public trust. A spatial Timber Supply Review, which involves locating the projected harvest level modelled on the landbase, could cover short term (i.e. 10 years) or long-term planning horizons (i.e. 100's of years). Although this falls outside of the Forest and Ranges Practices Act, we do not feel regulatory changes are necessary to accomplish this and it would serve to strengthen linkages to objectives set by government. Further clarity would be provided by;

- (i) Having Timber Supply Reviews drive land use planning. To achieve this, timber targets must be a required part of the planning process. Currently, this is not what the timber supply review for Timber Supply Areas or Tree Farm Licences does under s.8 of the *Forest Act*.
- (ii) Recommend the Minister give economic and social direction to the Chief Forester under s.8(8)(d) of the Act.

Benefits of spatializing the Timber Supply are well known in other jurisdictions and include:

- Accurately modelling government constraints into the Timber Supply Review process.
- Gives a visual representation of planned harvesting that indigenous people, public and stakeholders can interpret and comment on more readily.
- Provides a good check that the planned harvesting foot print is consistent with values modelled in the Timber Supply Review.
- Gives all parties a higher level of confidence that the wood is available and accessible.
- Allows for assessment of cumulative footprint of proposed road and block development.
- Improves transparency and public trust in forest management.

This process is more readily achievable than in the past, given that forest inventories are becoming more detailed and spatially accurate (i.e. individual tree inventory with LIDAR) and Forest analysis models and computing power are no longer a barrier at the Timber Supply Area level with models like Patchworks and Woodstock/Stanley.

Climate Change and Resilient Landscapes

Tolko's operations, employees, contractors and the communities they live in were particularly impacted by the 2017 wildfires. We are pleased to see a focus on, and strongly support, mitigating losses associated with natural disturbance events and creating a more resilient forest landscape.

- We recommend target volume expectations be pre-established by government for fire salvage and accountability for achievement placed with government land managers. This is essential to ensure we maximize economic and landbase recovery post fire.

- BC's 2017 and 2018 wildfires vividly demonstrated that our forests are dynamic and change over time (Natural Range of Variation). Constraining our forests from industrial activity will not eliminate fire, insect and disease from our forested landscape. We recommend removing static spatial constraints on timber harvesting and moving to a Natural Range of Variation model that has maximum age targets by tree species, as found in nature. This will start on us the path of providing a more resilient forest landscape.

Landscape Level Planning

We think our collective responsibility to indigenous consultation, stakeholder and public concerns need to be addressed as early as possible in the planning process. As discussed earlier in this letter, we feel the place for a first look at proposed harvesting is in a spatially explicit Timber Supply Review.

Our understanding is that Landscape Level Plans will replace the current Forest Stewardship Plans. Tolko's experience with Forest Stewardship Plans shows that these plans, need a direct link to Annual Allowable Cut determinations resulting from Timber Supply Reviews.

We think it is important to spatialize landscape level plans to assess the achievement of social, economic and environmental benefits. Planning tools and technology continue to expand and at a rapid rate. Use of these tools to develop an adaptive, dynamic plan that will work towards a resilient forest is essential.

Recommendations

Based on our comments above, we offer the following summary of recommendations:

- Timber Supply Reviews should be spatialized to improve indigenous people's meaningful input, support reconciliation and improve the general public, stakeholders and licensees confidence in the process.
- New technology, like LIDAR and forest analysis models should be utilized in Timber Supply Reviews and Landscape Level Plans to provide more adaptive, dynamic plans with the ability to assess the social, economic, environmental and cumulative outcomes.
- Static constraints on the forest landbase should be reviewed and revised with the Natural Range of Variability and dynamic principles in mind. A focus on managing the forest landbase versus an exclusive emphasis on the timber harvesting landbase should be reinforced. Static constraints should be tested for their durability at 10, 20 and 50 years in the future.
- New regulations must focus on increasing certainty for forest harvesting and forest management planning through the establishment and maintenance of timber targets. This will improve business and economic opportunities for industry, indigenous people, workers and communities.

We feel an emphasis on adaptive forest management solutions, specifically addressing static constraints on the forest landscape, will provide enhanced, sustainable benefits for British Columbia and our forests

Sincerely,
Tolko Industries Ltd.

A handwritten signature in black ink, appearing to read 'Mark Tamas', written in a cursive style.

Mark Tamas, RPF, Chief Forester

CC: Engage BC website submission- engagefrpa@gov.bc.ca