

Compiled Forest and Range Practices Act Consultation Feedback

Climate Change and Resilient Landscapes

1. 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?

Important factors for identifying opportunities and priorities for successfully adapting forest management to a changing climate are:

- *Maintain and further develop the results based forest management regime that provides forest professionals with the flexibility and ability to adapt their forest management practices to changing climatic and environmental conditions. More than ever, a prescriptive regime will not be effective in providing the flexibility and timeliness required to respond effectively to a changing climate and increasing levels of natural disturbance. A prescriptive regime naturally stifles creativity and the testing of new innovations, opportunities, and forest management concepts.*
- *Detailed field level knowledge of the particular forest area being managed. The effects of climate change are not expressed uniformly across the diversity of landscapes in British Columbia and forest management will need to be adjusted based on unique attributes at the local forest level. Forest professionals accountable for the sustainable management of a particular forest tenure are in the ideal position to collaborate with wildlife biologists, research professionals, First Nations, and local communities to provide detailed knowledge and guidance to the Province for opportunities and priorities tailored specific to the forest they are managing.*
- *Stable communities are the foundation of British Columbia. Policies or investments that increase climate change resilience should also facilitate long-term social and economic opportunities that support local forestry communities. Short term opportunities supporting long-term community stability include investments in tree breeding programs for drought resistance, climate based seed transfer monitoring, forest fertilization supporting carbon sequestration, promoting the increased use of wood products etc.*
- *Develop a pre-defined process that enables a timely response to natural disturbances such as salvage for windthrow, fire, and pest outbreaks. When responding to the last outbreak of the Douglas-fir bark beetle in coastal BC we learned that our ability to respond in a timely way to prevent further*

forest health impacts was limited by existing approval and system reporting constraints.

2. What factors should be considered in the planning of forest operations to reduce the risks of wildfire around your community?

Important factors to consider when planning forest operations around communities to reduce the risk of wildfire are:

- *Increasing the opportunity for the targeted and cost effective harvesting and handling of fuels in the urban interface followed by the regeneration of fire resilient forests.*
- *Harvest patterns designed and scheduled to create or compliment natural fire breaks such as lakes, rivers, utility corridors, and roads.*
- *Reforestation regimes that support the strategic creation of natural fire breaks through varying stand densities and the ecologically suitable use of deciduous species.*
- *Managing forest fuels and access in areas of high public use that have an increased potential for fire ignition.*

Landscape-Level Planning

3. 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?

Understanding what is important to the public is essential in making informed forest management decisions. Given that forestry is a complex science, it is critical that public input is combined with the detailed forest management knowledge and experience of forest professionals at the scale of the local forest. This enables a detailed understanding of the full scope of issues and their complexities in order to properly balance ecological, social and economic values. It is critical to ensure that information is not misinterpreted or utilized to make unbalanced or uninformed decisions that have unintended forest management consequences that are not in the public interest.

The forested landscape in British Columbia contains a complex arrangement of carefully designed reserves to protect biodiversity and wildlife. As forest professionals working with the public, we generally encounter a limited awareness of the sophisticated reserve network that currently exists. Providing a simple

government web-based interface that enables the public to easily access the latest information on landscape level reserves such as protected species-at-risk habitat, old-growth management areas, parks, conservancies, and other protected areas may be a simple means of increasing the level of public understanding through the planning process.

4. How would you like to be involved in the planning process?

Professional foresters are passionate about working with all stakeholders as we recognize that collaborative relationships are essential in how we deliver on our responsibilities. A planning process that facilitates informed engagement is important and enables plans to be developed that address local concerns. In addition to the formal legislated requirements, we currently engage with the public through forest certification processes, community advisory groups, and sharing of operational information maps. When a member of the public is interested in a specific site we generally organize a field walk to ensure that the items of interest are well understood, supporting the development of detailed harvesting or road building plans.

5. Resource roads are a valuable 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?

When planning, maintaining, and deactivating resource roads it is important to remember that they are a valuable asset and when designed well are a critical component of sustainable forest management. Forest professionals consciously decide to maintain or deactivate roads based on factors including:

- *The need for ongoing forest management access and long-term planning of multiple harvest passes;*
- *Access requirements for recreation;*
- *Managing for environmental risks including terrain stability, water quality, and fish habitat;*
- *Location of critical wildlife habitat; and*
- *Access to enable the timely and cost effective response to natural disturbance events such as fires, windthrow, and insect outbreaks.*

An important value for an effective road management regime is land base certainty enabling sophisticated long-term planning. Deactivating roads without long-term planning, increases the potential for unintended consequences such as increased environmental impact from rebuilding roads, reduction of the economic timber

harvesting land base, increased damage from wildfires, and reduced salvage of windthrow. Our experience with area based tenures is that they provide an effective means of facilitating long-term planning of a well-managed road network that extends across the full forest profile.

Looking ahead, maintaining road access is becoming increasingly important as the incidence of natural disturbance across our forests continues to increase. The cumulative effect of damage from natural disasters on the wide range of forest values can be minimized and mitigated when fires, windthrow and insect outbreaks can be accessed, managed, and salvaged expediently.

Public Trust

6. How can the Province improve transparency and timelines of information regarding proposed operational and landscape-level objectives, plans and results?

When the province is considering changes to operational and landscape level objectives, it is critical that the forest professionals accountable for implementing the outcomes are integrated early into the development process. Given the complexity of forest management, legal objectives need to be crafted in collaboration with all stakeholders to mitigate unintended consequences. Operational and landscape level objectives need to be integrated and aligned through to the detailed forest management practices on the ground. Forest professionals possessing the expertise and detailed knowledge of the forests they are managing are ideally suited to support the development of operational and landscape level objectives aligned with sound forest management practices.

7. 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)?

As forest professionals working with the public, we generally find that the information of interest varies by community and particular plan being developed. Much of the information that we prepare when developing our plans is relatively complex and without context or an incomplete understanding of the scientific terminology it is describing, has the potential to cause misunderstandings and confusion. We have therefore learned that it works best when the forest professional developing the plan is the one who reviews the forest management information that is of interest. This process is also effective as it formally develops the feedback loop as these are the same forest professionals who can then incorporate the feedback into the plan they are developing.

8. What additional values should be considered in FRPA that will allow us to manage forest and range practices in a better way?

A fully implemented and robust results based regime is fundamental to sound forest management. Investing in the next steps to further develop and refine all of the components of a results based regime as originally contemplated will lead to better forest management outcomes than to regress back towards a prescriptive regime. Continuing to advance a results based regime becomes even more important as we rapidly adapt to the influences of climate change on our forest management practices. Opportunities that we have identified for improvement to ensure a robust results based regime are:

- *Improve the linkage between the strategic level objectives and operational management decisions for the wide range of values. Coastal BC currently has a complex suite of objectives in place for a wide range of forest values. Given that many of these objectives overlap, are often complex, and can be in conflict with one another, it can be challenging to consistently translate them into our detailed forest management practices on the ground. We are currently creating and defining the integrated linkages through all of our plans relevant to the tenures we manage. This is accomplished by establishing targets for the strategic level objectives that can then be modelled and implemented through to the forest management practices on the ground.*
- *Spatialize the harvest across the landscape so that it is optimized and aligned with the clearly defined targets. This operationalizes the connection between strategic level objectives and the forest management practices on the ground through time. By monitoring our results while progressively looking forward we can confirm that the objectives for each of the values are being achieved on the landbase. For example, ensuring suitable habitat for wildlife or interior forest conditions across the forest through time aligned with strategic level objectives and targets.*
- *Further support long-term sustainable forest management planning through opportunities such as area based tenures that naturally facilitate integrated planning from strategic level objectives through to operational management. Landbase certainty provides a foundation for developing targets for a defined area that can then be planned, modelled, measured, and adjusted with increased accuracy through time.*
- *With the local communities in which we live and work being so closely tied to long-term sustainable forest management it is critical that economic and social impacts are quantified when considering forestry related decisions.*

- *Forestry provides what is truly the most climate and environmentally friendly building material on the planet. In light of climate change and the opportunities that our forests provide, we must manage for the full carbon life cycle of our forests including long-term forest products and substitution benefits.*
- *The local Forest Management Leadership Teams (FMLT) provide an excellent platform to build from to take new opportunities, ideas, and innovations from concept to implementation. A formalized continual improvement framework built on a robust change management process could be developed that empowers FMLT's to create meaningful changes as they are comprised of the forest professionals with the hands on knowledge and expertise relevant to the local forests they are managing. A change management process built on the concepts of "Plan, Do, Check, Act" would be an effective means of overcoming barriers to change ensuring an effective results based regime.*

Oversight and Accountability

9. 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?

Ways that the province can strengthen government oversight and accountability is to:

- *Further develop and refine the existing results based regime so that we can readily adapt to our changing climate and the cumulative effects of natural disturbances that are projected to increase over time. Prescriptive regimes that inhibit the flexibility to adapt, respond quickly, or implement new practices can lead to undesirable and poorly balanced forest management outcomes.*
- *Improve the current focus on monitoring for a single value, to monitoring for the balance of forest values. Too often, monitoring focuses on a single value and does not recognize the benefits of how multiple values were integrated to develop an optimized plan that reflects the ecological, social and economic values for the area. While it is recognized that this is more complex than the current monitoring regime, a functional Forest and Range Evaluation Program (FREP) is a core component of an effective results based regime. Monitoring for a balance of forest values would align with the planning process outlined above while also better reflecting the integrated forest management practices currently being implemented in British Columbia.*

- *Continue the mandate of the Forest Practices Board and increase government's recognition of forest management successes and best practices being implemented across British Columbia. This will continue to strengthen the public's trust in the oversight of our forests.*
- *Facilitate and promote research that continuously improves forest practices and our understanding of the resource. This is an opportunity for government and industry to collaboratively demonstrate leadership in sound forest management practices.*

As the forest professionals who are passionate about sustainable forest management with deep connections and knowledge of our local forests we appreciate the opportunity to contribute comments. From experience, we cannot express enough the importance of having an effective policy and legislative framework that supports a long term positive outcome for Coastal BC that is economically viable and allows for a globally competitive forest sector. We implore you not to rush these changes as our forests are too important to not only to our local communities, but all residents of BC. The potential for unintended consequences to sound forest management practices are real and material.