



July 15, 2019

The Honourable Doug Donaldson,
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Parliament Buildings
Victoria, B.C.

Dear Minister Donaldson:

The WFCA represents the seedling nursery, silviculture contracting and forestry consulting firms that make up the reforestation service sector of British Columbia. As an organization we have a keen interest in the Forest and Range Practices Act and the proposed Amendment Act, 2019 – Bill 21. The WFCA welcomes the opportunity to comment and provide input to this important process.

The WFCA is supportive of the proposed changes to FRPA including;

- more frequent and reliable opportunities for public input
- improved information sharing in forest planning
- strengthening the Minister's ability to manage forest planning
- expanding the definition of wildlife in the Act
- improving and streamlining range use planning

These, along with the additional ones we suggest in this submission, are all critical objectives that speak to important relationships and practices in forest and range stewardship. Nevertheless, to be wholly effective and logical they need to be animated by a larger purpose or vision for the landscape that the improved FRPA intends to ultimately bring about. We do not see that imagined future forest state elaborated in the discussions so far. This overarching outline of where all these proposed objectives would sit relative to each other and what, ultimately, they are acting in aid of needs to be more clearly laid out.

Besides being necessary in order to create a more logical strategy, laying out a higher vision for improving FRPA answers to the effects of fifteen years' worth of natural disturbance and assaults on the forests and ranges of BC since the Act was brought into effect. Few people—except a handful of fire

scientists—were forecasting anything close to what has actually happened on the landscape since 2004 in terms of blight, pests and wildfire. Whatever were the ideological certainties, animating ideas, assumptions and strategies that informed the original FRPA, they are very out of date today. The next iteration of FRPA needs to be a new regime with a vision as transformative as the dramatic events we see playing out on the landscape today and continuing into the future as climate change gains momentum.

With this in mind we suggest that FRPA include a vision that would be wholesome and aspirational. But that statement would go beyond the benign ambiguities typical of these kinds of declarations by making some substantive observations and giving direction. In particular it would observe that it is in the nature of the complex ecosystems that make up our landscapes to be dynamic and linked. It would acknowledge that this changing landscape cannot be treated as a static inventory of values we think are important. It would require that we need to act to today in concert with these dynamics to create conditions on the landscape that will lead to a future state of resilience, diversity and abundance. All relationships, practices, and rules must in their own way support this defined vision of a future forest and range state.

That said in general the WFCFA is not happy with the health of our forests in British Columbia. Historic policies such as fire suppression, a framework of static land management through land use planning and many other policies and practices (e.g. stocking standards) have left our forests in poor forest health that has led to the mountain pine beetle outbreak, impacting 18-million hectares, and other insect and diseases like Douglas-fir, Spruce, and Balsam bark beetles that have heavily damaged our forests and made them more susceptible to wildfire. The wildfire problem has been well document in many circles and WFCFA has been actively lobbying government to take more action on this file since 2003. As an organization we have sponsored two successful wildfire conferences to promote new ideas and practices that need consideration in future management.

Our organization believes that the changes to FRPA are important, but these alone will not fix many of the underlying problems of the current forest legislation framework. First and foremost, we would like to advocate for a silviculture objective. Our current silviculture focus is on stand establishment, but there is no strength in the current legislation to protect or manage for forest health and disturbance through the rotation. If licensees expect to see a future crop on a specific license the WFCFA believes that each license-holder should be accountable for, and manage for wildfire and insect and disease problems through the whole rotation. Had there been an objective for silviculture in the past we may have had a larger impact on the mountain pine beetle and other pests currently impacting our forests throughout the province.

Over the past 16 years there have been eight significant wildfire seasons that have cost the Province billions of dollars in fire suppression costs. While the government has allocated significant funding to address this problem, the root cause is in forest management. Our policies of suppressing all fires has result in encroachment of trees into our grasslands and ingrowth (increases in stand density) in our forests. These changes have resulted in high hazard fuels in almost every interior landscape that will support large and destructive wildfires.

The WFCFA supports a wildfire objective that is focused in strategically, near to communities, important infrastructure, and for high environmental and resource values. The standard of fuel management should be a FRPA focus. The most effective legislation would be to set a fuel management standard

where fine fuels (<12.5 cm) in these areas be managed to <15 tons per hectare. While this is a suggested target the WFCA feels that in the absence of slash burning we need a high standard of fuel management to achieve the desired results of reducing surface fire intensity which will in effect reduce the potential for crown fire and catastrophic loss. Additionally, these standards of fuel loading will enable BC Wildfire Service to be more effective in doing their job.

While the current FRPA legislation has an objective for water quality, our organization believes that the current legislation is not strong enough to protect water quality and quantity. Greater protective measures are required. There are a number of Forest Practices Board reports that have touched on this along with multiple reports where individuals, businesses, and communities have been in contention with licencee's over water protection issues. The WFCA would like to see this section of the legislation strengthened.

Sincerely,

Bruce Blackwell M.Sc. RPBio, RPF, President

Western Forestry Contractors' Association