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FRPA Phase 2---- Wildsight Supplementary Submission

Wildsight works to protect biodiversity and create healthy communities in British Columbia's Rocky and Columbia Mountains. This document is an addendum to our joint BC ENGO submission.

Timber objectives should not take precedence over maintaining and restoring healthy ecosystems that support native species of plants and animals, water and our communities. FRPA should focus on forests and range, not forest harvest and animal unit months. Use of forest ecosystems should be an outgrowth of managing for healthy ecosystems, not timber supply.

Maintaining and restoring healthy, functioning ecosystems should take priority in all management. One of the most fundamental changes necessary is removal of the statement "without unduly reducing the supply of timber from British Columbia forests" from all FRPA objectives and regulations. The statement "without unduly reducing the resilience of ecosystems" should be added to timber and other land use objectives.

Forest Management must be brought back into the hands of the province and the people of British Columbia. The concept of "professional reliance" has failed. The statutory decision maker must have the opportunity to require changes or not approve plans based on information from industry representatives, the public and government staff. A rationale for decision, including response to comments, should be publicly available.

Wildsight supports in principle the submission by the Forest Practices Board in regard to Tactical Forest Planning. The type of landscape level planning described in the Board's submission is the missing link between strategic plans/policy and operational plans. Landscape level planning should be mandated by FRPA, integrating both social values and the use of the best technical information. It is important that the process is inclusive of multiple forest values and specific to place and time, maintaining emphasis on the full complement of species and ecological processes.

The following issues need to be addressed in changes to FRPA.

- Prioritize ecosystem values including old and mature forests, wildlife and water in forest planning and management. Maintain the full complement of species and ecological processes.
- Eliminate net downs of old and mature in all land use plans.
- Maintain and restore connectivity and reserve more areas across the landscape.

- Enhance watershed and riparian protection measures to ensure water quality, temperature, quantity and timing of flow. Allow only management that maintains riparian shade.
 - Increase forest carbon storage by increasing the length of harvesting cycles and eliminating old growth logging.
 - Stop slash burning and employ alternative methods for dealing with slash generated by logging.
 - Monitor range conditions and manage range and range tenures according to changing climatic conditions.
 - Invasive species management that will control and reduce invasive species must be included in all operational plans.
 - Wildfire risk management must consider protection and enhancement of high ecological values such as important wildlife habitat, habitat of species of concern, old forests and areas of cultural significance to indigenous peoples.
 - Encourage deciduous forests by reserving deciduous species and stop spraying of deciduous forest cover.
 - Create shaded fuel breaks. Eliminate clearcutting and monoculture planting.
 - Protect communities by creating shaded fire breaks of open forest through partial cutting techniques and enhancing growth of deciduous species.
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- Map existing state of the forest including species, age class; past, proposed and existing impacts from all licensees and tenure holders on the landscape
 - Map and assess ecosystem values such as wildlife habitat, old growth forests, habitat of species of concern.
 - Encourage opportunities for carbon sequestration.
 - Assess, avoid and remediate impacts to water quality, temperature, quantity and flow.
 - Consider recreation values in landscape level and operational planning.
 - Assess and accommodate land use tenures that could be influenced by logging.
 - Include public participation in landscape level planning and operational plans. There should be the opportunity for the public and ministry (habitat, wildlife, forest) staff comment to both the licensee and government decision maker before plans are approved. Comments by the public and those of government staff should be publicly available.
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- Roads are the single greatest impact to water and wildlife from logging operations. Actively minimize road density in order that 60% of all landscape units is more than 500 metres from open roads.
 - Make use of temporary roads wherever possible. Be required to provide rationale for any new permanent roads. Require road deactivation at 2/1 ratio when new roads are constructed.
 - Reduce incentives for road building and incentivize road rehabilitation (recontouring and planting).
 - Engineer roads and crossings to eliminate siltation.
 - No roads into intact drainages.

- Prioritize habitat connectivity in assessing road development.
- Refer to the Chief Forester’s critique to improve FSPs and make them meaningful and enforceable.
- Forest Stewardship Plans must be detailed and publicly available (online).
- Landscape level plans and site level plans should be reviewed by the public and relevant ministry staff with at least 60 days for consultation before decision maker approval.
- Information, including up to date forest cover mapping and site information being used by industry in designing plans should be publicly available as part of the review process.
- Information should be publicly available on request from FLNRORD and MOECC staff re: wildlife, fish, habitat, water.
- Maintaining and restoring healthy, functioning ecosystems should take priority in all management. Remove the statement “without unduly reducing the supply of timber from British Columbia forests” from all FRPA objectives and regulations. Add “without unduly reducing the resilience of ecosystems” to timber and other land use objectives.
- Make biodiversity and carbon storage priority objectives of FRPA.
- Changes to FRPA should be guided by government commitment to the United Nations Declaration on the Rights of Indigenous Peoples.
- Government capacity must be restored for oversight, decision making, monitoring and enforcement. Government must be in control of our natural resources on behalf of British Columbians.
- Government staff must monitor the state of forests and range based on ecosystem based objectives to maintain healthy functioning ecosystems. Objectives for old and mature forests must fall within evidence based natural range for all ecosystems and be applied across the landscape.
- Range condition should be assessed annually and tenure allocations adjusted appropriately.
- Establish a provincial “Science Council” involving experts in both Western and Indigenous science to evaluate the condition of forest ecosystems and to establish biodiversity targets to be applied through landscape level planning.

Wildsight appreciates the opportunity to comment on changes to FRPA and would like to participate in ongoing discussions in order that legislative changes effectively reform forest management in British Columbia.

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