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Minister Steve Thomson
Ministry of Forests, Lands and Natural Resource Operations
PO Box 9049
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Victoria, BC
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Dear Minister Thomson

Eight years have passed since the results-based regime under the *Forest and Range Practices Act* (FRPA) was introduced to replace the prescriptive-based Forest Practices Code. While the shared stewardship framework between government and industry of the FRPA regime is arguably sound in concept, the BC Wildlife Federation membership has identified a number of concerns and weaknesses associated with implementation of this management regime.

First and foremost, we see little in the way of responsible government oversight at the strategic level. There has to be better leadership and ability to provide direction and coordination at the broad management unit level. There is a desperate need for development of a management planning framework that integrates landscape level biodiversity and wildlife requirements with forest development. This was exemplified by the Forest Practices Board's investigation into the salvage of mountain pine beetle wood and failure of licensees to implement the chief foresters "guidance for consideration" to plan for increased mature forest retention at the landscape level to accommodate concerns about the increase in the AAC. Government's response to the issue last year indicated a sustainable forest management planning (SFMP) framework was under development that would integrate all aspects of landscape-level operational planning and be implemented within each TSA or similar management unit. Such a planning framework would provide clear, measurable objectives and direction necessary to inform forest professionals who are expected to make decisions to balance economical, environmental and social benefits from our public lands. The BCWF endorses this type of planning initiative but has no information on current status; please provide an update.

On a somewhat related topic but specific to the review and approval of licensee forest stewardship plans, we are concerned that the proposed results and strategies for managing non-timber resources such as wildlife habitat are not referred to the regional wildlife manager/biologist for the opportunity to review prior to the minister's delegate approval. (The

issue also concerns scope of practice by forest professionals; it is time for an investigation into the compliance and effectiveness of professional reliance.) Now that most natural resource programs are united under the MoFLNRO, is it not reasonable to implement a decision-making process that incorporates and integrates all forest-related values and disciplines?

The *Forest and Range Evaluation Program* (FREP) is a critical component of the results-based framework that evaluates and monitors the effectiveness of forest and range practices in achieving management objectives. The BCWF is very supportive of FREP but is concerned that despite being in existence since 2003, effectiveness monitoring protocols are still under development for some identified resource values. This is especially disappointing with respect to both wildlife and landscape-level biodiversity, as there has been a large amount of research conducted by government, academia and industry over the past decade towards the development of criteria and indicators for these values. Can the Minister confirm his commitment to FREP, the Ministry's work plans to address the shortfall's, and in particular define the staffing levels region by region assigned to this valuable stewardship program?

The 2010 FREP annual report identifies some serious issues related to range management practices. With respect to *fish/riparian* values, livestock trampling in riparian areas was a top-ranked impact factor, affecting 24% of all sites with recorded impacts (not properly functioning category) in the Southern Interior Forest Region. Results for the *forage (range)* resource value are also disconcerting; forage condition on 44% of sampled upland areas, 32% of wetland sites and 37% of streams were assessed as being moderately to highly at risk to non-functioning. Clearly, much more effort must be directed to the poor compliance and effectiveness of range management practices on riparian habitats and forage condition, e.g, maintaining natural barriers along streams and wetlands, and where not feasible erection of exclusion fencing, better use of deferred- and rest-rotation grazing systems, etc.

Another area of concern to the BCWF is the apparent reduction in stand-level biodiversity in our managed forests, especially in the interior of the province. Empirical observation by many members shows a continual harvest of mixed-species 'first-growth' forests followed by reforestation with monoculture, or near-monoculture, stands. We note that a FREP project (*Tree Species Composition and Diversity in British Columbia*, Report #14, 2008) conducted a comparison of the proportion of monoculture stands versus mixed stands by looking at species composition pre- and post-harvest at free-growing, and reported only a relatively small increase in monocultures since 1987. However, we do not agree with the methodology, which simply used the primary and secondary species reported in the RESULTS database. A monoculture was defined as one species comprising > 80% of the stand; thus a pre-harvest stand of 85% PI and 15% Fd and subsequently reforested to 100% PI are both considered monocultures, when in fact the removal of the secondary fir component could have a disproportionately huge impact on forest health and wildlife species diversity. To be a meaningful metric for tree species and stand diversity, we maintain that the methodology must include tracking the actual timber cruise species stocking percentages to compare pre- and post-harvest composition.

We have been hearing rumours for some time of a somewhat covert government project exploring opportunities to mitigate significant mid-term timber supply shortfalls through relaxation or deferral of non-timber objectives that call for some mature forest stand retention. Many of these non-timber objectives include provisions designed to protect critical wildlife habitats and representative ecosystems, such as legally designated wildlife habitat areas, ungulate winter ranges, wildlife tree retention areas, riparian management areas, old growth management areas, and other areas established to manage non-timber forest resources. Most of these provisions are already capped to minimize impacts on timber supply. Minister

Thomson, lifting these “constraints” would be a very myopic strategy, as they would contribute little to mitigate mid-term timber supply fall down, but would have significant long-term adverse impacts on non-timber resources. The MFLNRO service plan identifies to “Become a world leader in growing trees” as a key initiative; addressing the Not Satisfactorily Restocked backlog and investing in incremental silviculture activities is the responsible way to increase future timber supply. Can the Minister comment on proposals by MLA’s in the Omineca region and elsewhere to harvest wildlife patches and lake shore reserves to assure us that this is not on government’s agenda now or in the future?

In closing, we believe the ministry has given up too much control and direction under the results-based forest practices framework. We have great concern that the inability of this government to provide the necessary oversight and investment in the stewardship of our renewable natural resources has done damage to the health of our forests and the other values that are so important to the citizens of this province and our membership within the BC Wildlife Federation.

Yours in conservation,

A handwritten signature in black ink, appearing to read "R. Wiebe". The signature is written in a cursive, flowing style.

Rod Wiebe, President
BC Wildlife Federation

Cc: Al Gorley, Chair, Forest Practices Board, Victoria
Cc: Norm Macdonald, Opposition Critic for Forests and Range, Victoria
Cc: BCWF Membership