



Forest Range and Practises Act Input July 2019

The B.C. government is inviting British Columbians to provide input into improving the Forest and Range Practices Act (FRPA). This is an important chance to affect long-term forestry practices.

The YCWS is submitting input on behalf of our community. We encourage you to provide input as well. Our Society chair Jason Leus, along with Dan Spring, has created these answers that relate to the situation Ymir and other communities are facing in their watersheds. Use these comments as is or for guidance. Each question has our interpretation to assist you in developing your own answers. These do not represent all the changes that could benefit FRPA - they are a contribution to the entirety of feedback that will be received.

The deadline for input is Monday July 15, 2019 at 4pm.

Input is accepted via:

-online form at <https://engage.gov.bc.ca/forestandrangepactices>

-email engagefrpa@gov.bc.ca

Question 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?

YCWS Interpretation: Make suggestions about how the Province should do forestry in our changing world. Consider climate change, insect impacts, drought conditions, forest fire mitigation, drinking water availability, and other factors that could impact or protect communities and wildlife.

- Prioritize cutting less and more carefully
- Selectively cut and replace with a mix of fire resistant species
- Incentivize companies to use careful light-touch forestry/road-building techniques over heavy-handed industrial techniques
- Only allow road building and forestry work when wildfire danger is low

Any forestry or road-building project proposed within consumptive-use watersheds needs to undergo a much higher level of scrutiny and due-diligence



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including a wide range of scientific assessments conducted by non-advocate Qualified Registered Professionals (QRPs) that inform evidence-based and risk- adverse decision-making. Local stakeholders need to have the power of consent for any project that could negatively impact the place where they live and/or work. The duty to allow stakeholders and rightsholders to comment of development proposals is not enough, and does not protect the interests of the residents of BC.

More important than ever is to push for a value-added forestry industry in BC. Create jobs and provide a better product than raw logs for export. If our forestry industry was able to create more jobs and revenue, we could afford to cut less and more carefully while protecting BC communities, rather than endangering them by subjecting them to landslides, floods, and negative impacts to water quality and quantity from heavy-handed high volume timber grabs.

Question 2

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

YCWS Interpretation: How can forestry be done to reduce wildfire risks close to communities?

- Cut lightly and carefully
- Replace cut trees with fire resistant species
- Completely rehabilitate access roads so motorized access is impossible
- No forestry or road-building when fire danger is moderate or higher.
- Industry pays back into communities close to their operational area (wildfire defense fund)

Cut-blocks (dry open areas) can accelerate the spread of a forest fire. Fires can and have been started by forestry/road-building equipment and workers, and resource roads provide access to wild-land firefighters but also to the public who bring fire with them so public access is a double-edged sword. No amount of road deactivation can stop access by off-road vehicles, unless complete road deconstruction and remediation is considered an option. Almost all forest fires are caused by humans or lightning strikes: lightning strikes can not be controlled but public access can.

Going forward we need to be more careful when road-building and logging, particularly around communities. Conservatively, no road-building or forestry



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work should be done when Forest fire danger is moderate or higher. No large openings should be created close to communities. Replanted areas should prioritize slow burning tree species over fast burning ones. Forestry licensees should contribute a portion of their revenues from projects in close proximity to communities, to community wildfire defense initiatives like sprinkler structural protection equipment and training. Any roads built should be completely rehabilitated to best discourage public access.

Question 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?

YCWS Interpretation: What information should be available to your community before forestry projects are green-lighted?

The province needs to create and maintain a regularly updated online resource for all forest and ranges information. It should include: all allotments, apportionments, awarding of timber licenses, lists of timber licensees and location of their licenses, proposals, plans, contracts, agreements, memorandums of understanding, and interactive maps that include known ecologically sensitive areas, species at risk, geological deposits of note (Acid Rock), and terrain stability information. It should also include histories of timber licensees and comprehensive list of any of their past infractions, as well as areas negatively impacted by their activities. We need to provide increased incentive like easily accessed records in order to promote responsible practices.

The public needs to know what projects are planned and who is involved long before any on-the-ground work begins, including scientific assessments.

Question 4

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

Stakeholders and rightsholders need to be invited to join the planning process in which there is a duty to acquire their consent.



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FRPA has effectively cut out stakeholders/rightsholders from participating in the process in any meaningful way. The only effective way to avoid negatively impacting communities is to consult in a meaningful way with local stakeholders and rightsholders. Stakeholders that include, but are not limited to community members and water users, need to have the ability to stop or approve any resource development proposal that could negatively impact the place where they live. This will promote a robust process in which industry is required to prove their proposed projects are safe to residents and low impact to communities and ecosystems.

Question 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?

YCWS Interpretation: What are the most important factors to consider when planning new roads?

A balance must be struck between the emergency access roads can provide and the negative impacts roads can have on ecosystems and communities. Improving historic roads should be considered before proposing new roads. Roads need to be built in such a way as to not disturb natural drainage patterns or affect the timing of flow in consumptive-use watersheds. Acid rock assessments need to be conducted by QRPs before any new road is cut, and any findings of Acid Rock must necessitate a redesign of the proposed road. Building road through areas of Acid Rock in any consumptive-use watershed is unacceptable. There is no acid rock mitigation technique that can protect a community's potable water with 100% effectiveness. The province has a fiduciary duty to ensure BC community potable water sources are not poisoned as a result of resource development.



Question 6

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

YCWS Interpretation: Would you like access to easily available information about the forestry goals, plans, and impacts?

The province needs to create and maintain a regularly updated online resource for all forest and ranges information. It should include: all allotments, apportionments, awarding of timber licenses, lists of timber licensees and location of their licenses, proposals, plans, contracts, agreements, MOUs, and maps. It should also include histories of timber licensees and comprehensive list of any of their past infractions.

The public needs to know what projects are planned and who is involved long before any on-the-ground work begins, including scientific assessments.

Question 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)?

YCWS Interpretation: What information would you specifically like to see?

The public needs to see all of the information that pertains to any resource development that could affect the place where they live and/or depend on for business. This includes all information regarding, past, present and future objectives, plans, proposals, and projects. This should be available online in an organized and user-friendly format that is regularly updated, and include: all allotments, apportionments, awarding of timber licenses, lists of timber licensees and location of their licenses, proposals, plans, contracts, agreements, MOUs, and maps. It should also include histories of timber licensees and comprehensive list of any of their past infractions.



Question 8

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

YCWS Interpretation: How can the Provincial Government change things so that communities, wildlife, and ecosystems are better protected? Include specific values like drinking water, fire hydrant water, ecologically sensitive areas, etc.

Particularly in consideration of the climate challenges that lie ahead, FRPA needs to change to ensure the current values (soil, timber, water, biodiversity, riparian and fish, wildlife, visual quality, cultural heritage, resource features, recreation and forage and associated plants.) are properly protected. The current FRPA provides no protection of these values, nor any accountability when these most important values are negatively impacted as a result of resource extraction.

Question 9

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?

YCWS Interpretation: What rules can we make to hold industry and government accountable for negative impacts to ecosystems, wildlife and communities that happen because of forestry projects?

It is a serious injustice that BC residents take all the risk while forestry companies reap all the rewards from their projects. It is also unacceptable that the ability of stakeholders, and rightsholders to participate meaningfully in decision-making that can impact the place where they live has been so radically diminished.

Changes to FRPA need to include both a duty to consult meaningfully with stakeholders/rightsholders as well as a duty to acquire the consent of stakeholders/rightsholders before any logging or road-building proposal, that could negatively impact the place where they live/work, is allowed to proceed.

Corporations, whether foreign or domestic, need to be 100% financially responsible for any negative impacts that result from their forest/ranges development projects, and the BC Provincial Government needs to hold them to account.