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Bulkley Valley, B.C.  
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## **Re: Draft B.C. Biodiversity and Ecosystem Health Framework**

In this time of a global and regional climate and biodiversity crisis, this initiative has been a long time in coming but welcomed just the same. However, the track record of the provincial NDP led government and its predecessors has been, frankly dismal, and has generated far more pessimism than optimism among the public concerned about a sustainable future.

This is not the first time we have heard the phrases, in one fashion or another, that:

- the *“B.C. government is committed to protecting and conserving the province’s biodiversity and ecosystem health”*;
- the provincial government is committed *“to prioritize the conservation and management of ecosystem health and biodiversity, including the conservation and recovery of species at risk”*;
- *“Canada has committed to halt and reverse biodiversity loss and formally recognizes that every Canadian has a right to a healthy environment.”*

Yet and repeatedly so, we have seen the opposite in the sense of putting one-foot forward, then taking two steps backward. Some examples follow:

- Not implementing and government distortion of habitat conservation direction of established strategic land-use plans throughout the province.
- The non-implementation of conservation (wildlife and habitat) legislative provisions of the Forest & Range Practices Act (FRPA) and the Wildlife Act, and the abolishment of its predecessor the Forest Practices Act (FPA).
- The creation of loop hole policies to circumvent the conservation intent of legislative provisions of FRPA and its predecessor FPA.
- The promise of a provincial species @ risk act since the Rio de Janeiro Convention on Biodiversity back in June of 1992; that is nearly 32 years ago!
- Continued logging of critical habitat in many areas that continue to lead to species extirpation such as the northern goshawks, spotted owls, marbled murrelets, caribou, among others.
- The promise for effective access management to reduce predator movement across the landscape, but with minimal progress to date while more of the land-base becomes heavily roaded as a result of forest development expansion.
- The talk about the 30 x 30 protected areas initiative while we witnessed the cancellation of approximately 545,000 ha of non-administered conservations lands within the Skeena Region, some of which were in process for transfer of authority from the Land Act to the Wildlife Act for long-term conservation (administered conservation lands) designation.
- Non implementation of developed Decision Support Tools that effectively guide the intensity and duration of forest development in any given watershed at various spatial

scales to ensure the maintenance of watershed hydrological integrity, all the while government has been continuing to talk about its goal to “*consider cumulative effects & address the potential impacts of timber harvesting activities.*”

- Treating old-growth deferral areas as business as usual logging without considering the voice of the major constituents of B.C., namely non-First Nation people. How is this going to result in adequate old-growth forest conservation when the majority of deferral areas, at least in central and northern B.C. that I am familiar with, continue to be dwindled down through forest harvesting because of provincial government’s policy to discount the deferral areas when there is no current endorsement by respective FNs, in part because they wish to have higher levels of discussion with respect to their constitutional rights?

The provincial government needs to demonstrate intent to gain back some level of public trust, and not wait years of Framework development before implementation. It is time to show government’s intent by immediately:

- 1) Cease all logging in big treed old growth.
- 2) Abandon clear-cut logging, single or two-pass approaches; this abandonment includes clear cuts with “reserves” since they still set hydrological recovery to zero.
- 3) Institute “canopy retention” forest practices within conducive biogeoclimatic zones such as Interior Cedar-Hemlock (ICH), Coastal Western Hemlock (CWH), Engelmann Spruce-Subalpine Fir (ESSF), Mountain Hemlock (MH), Montane Spruce (MS), Coastal Douglas Fir (CDF), and within multi-species stands that have a component of shade tolerant tree species that exist in the Sub-boreal Spruce (SBS) for example.
- 4) Curtail all public subsidies to the bioenergy/wood pellet industry such as the grade 4 credit system and Forest Enhancement Society, of which are exacerbating the climate and biodiversity crisis.
- 5) Annual accounting for carbon in our forests that include forest practices, and losses due to wildfires, insects and diseases, to effectively and truthfully report on carbon capture and release.
- 6) Implement science-based decision support tools, some of which are already in existence, that support a cumulative impact framework with respect to watershed hydrological integrity at a multi-scale approach.
- 7) Ensure that there is sufficient public representation on all of the planning tables that are working towards revisions to forest management direction.

**A Biodiversity and Ecosystem Health Framework is not required to implement the actions cited above.**

The government speaks to a “*collaborative stewardship approach*”, but the roll-out of the Forest Landscape Planning initiative is not collaborative when public strategic plan over-sight bodies such as the Bulkley Valley Community Resources and the Kalum Plan Implementation Committee are not given a seat at the table that is strictly comprised of government, industry & First Nations (FNs). This appears to be more of a top-down approach than a bottom up collaborative approach, and from my perspective, is a path to failure.

I and many others, have been lobbying for the transformation of forest practices in B.C. for many years, and the Framework's language is most welcomed: *"The Framework sets the stage for the desired transformational shift from a land management system that prioritizes resource extraction (subject to constraints) to a future that is proactive, prioritizes the conservation and management of ecosystem health and biodiversity..."* However, based on my many decades of forest management and conservation in B.C., this transformative change initiative is destined to fall off the rails if the root of the issues is not effectively addressed. Simply targeting the symptoms will not achieve the desired outcome.

Clearly a few things have to happen to truly make the necessary paradigm shift to create the template from which to build on:

- 1) Take forest management out of the hands of the timber manufacturing industry; i.e. tenures not tied to wood processing facilities, and use management approaches such as the Algonquin Forestry Authority & Community Forests. Foresters are clearly in a conflict of interest working for the wood processing facilities since their primary focus is on tree farming and not ecosystem-based management.
- 2) Re-vamp the stumpage appraisal to create incentives and not disincentives to canopy retention forestry.
- 3) Re-vamp the Timber Supply Review process to proactively consider best management practices for watershed, ecosystem and biodiversity health/integrity, inclusive of meaningful climate change considerations.
- 4) Ensure that the proposed Office of Biodiversity and Ecosystem Health within the B.C. Public Service has strong cabinet support and appoints a Chief Ecologist that has precedented powers and authorities over the extractive resource agencies such as the Ministry of Forests (MOF) and B.C. Timber Sales (BCTS). The organizational bias of the MOF & BCTS has and continues to be a major hinderance to meaningful forestry transformation.
- 5) Have a level playing field with respect to government lobbying since companies can right off lobbying costs as part of business expenses in terms of taxation, but ENGOs that hold charitable status are severely hampered in terms of what they can spend in political lobbying under present Federal legislation. The lobby power of the of the forest industry seems to surpasses that of the constituents of British Columbia.
- 6) Education and awareness are critical for initiative support. Given that both government agencies (MOF and even the Ministry of Water, Land & Resource Stewardship), and the forest industry have and are continuing to contribute to misinformation to hold the status quo, and thus contributing to social injustice, it is imperative that such misinformation is immediately challenged and corrected to be factful and truthful. This is becoming ever more challenging given the development and thus tendency of misuse of social media algorithms where the reader is subjected to material feed that further justifies their in-grained belief or cynicism, and erodes a critical thinking approach.

Yours in conservation for a sustainable future,

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