



Province of  
British Columbia  
LEGISLATIVE ASSEMBLY

ANNE EDWARDS, M.L.A. (Kootenay)

LEGISLATIVE BUILDINGS, VICTORIA, B.C. V8V 1X4 - 387-3546

CONSTITUENCY OFFICE: 36 VAN HORNE STREET SOUTH, CRANBROOK, B.C. V1C 1Y9 - 426-2544

PRESENTATION TO PUBLIC INFORMATION SESSIONS on proposed policy and procedures for the replacement of major volume-based tenures with tree farm licences. Nelson, B.C., March 6, 1989.

My presentation rests on several premises basic to the reasoning herein. One is a recognition that the public is demanding that British Columbia's environment be respected and protected, that any resource development must be limited by the ability of our environment to tolerate that development and be available, in a healthy state, to nurture our descendants as well as it has nurtured us. The public would no doubt strongly object to the Ministry placing, in its criteria for evaluating proposals, the need to further "the development objectives of the Crown" ahead of the need to meet "the objectives of the Crown in respect of environmental quality and the management of water, fisheries and wildlife resources."

My second premise recognizes that our forests have many users, and that each has its legitimate right to participate in decisions affecting the forest's health. Thus, any consideration of a major change in forest tenures must genuinely involve all users. The problems that exist are recognized by the Ministry when it warns applicants for Tree Farm Licenses (TFLs) to "give consideration to conflict resolution, where necessary, prior to submission of their letters of intent," but it prioritizes forest use above all others when it suggests that areas where non-timber resources are the predominant value, and which have a high integrated resource management sensitivity, might be included in a TFL where "the deletion of such areas would undermine the geographical integrity of a proposed TFL as a management unit."

The forest industry directly employs some 1500 people in the Kootenays, but I daresay an equal number or more are employed in forest and range related agriculture, wildlife and fishing, recreation and tourism industries. The land base does not so easily separate for analysis as do the descriptive words.

What would TFL tenure do for range users, creek and river users, other forest users? As the quotation above indicates, areas not used primarily for timber would be included in TFLs. We would be foolish to think boundaries could be drawn to separate uses. But the application for a TFL barely recognizes other uses. Look at the Outline for a Tree Farm Licence Application/Proposal under Section 27.1 of the Forest Act, on page 14 of Proposed Policy and Procedures . . . that was circulated for these meetings. The Ministry wants to know about tree cutting. As well, the Management Working Plan (MWP), while it at least recognizes recreation, fisheries and wildlife resources, does not mention range. Those who would know what future range has would have to look under other headings and hope it were there. (Background Information, p.7)

The range issue is crucial in the East Kootenay, where resource conflict has a long and bitter history. Range is scarce for cattle and for wildlife. The best range was lost nearly two decades ago to the Libby dam reservoir, Lake Koochanusa. Chronic loss of range through forest ingrowth and land alienation continues. An estimated 40 per cent of range in the Rocky Mountain Trench has been lost to scrub forest over recent decades. Where the health of our agricultural industry depends on improved and expanded range, promised increases in numbers of Animal Unit Months (AUMs) have not materialized. Will some of the scarce range now be managed by the forest industry, who could restrict access unnecessarily or, at the very least, manage to promote forest succession in preference to grassed land?

The East Kootenay's wildlife resource is unique in North America, rare in the world, so great is the variety of game animals within such a small area. The major threat to wildlife vis-a-vis range is forest succession on land that might more efficiently be managed as range. Will the forest industry be willing to so manage? Will the government ask the industry to do so?

As for the range resource, two other government studies are currently being reviewed, one by the Ministry of Forests on range management, the other by the Ministry of State for the Kootenays. Although the latter deals more with private than public land, management of the latter severely impacts the former. In the Ministry of Forests review, agricultural range users are touted as range managers. What does the Ministry see: range within TFLs managed by the forest industry, range used by cattle managed by the agricultural industry, anything left over to be not managed at all? Or does it see mandating range management to the agricultural industry, even if the range falls within TFLs? Would we lose some range? What would happen to Co-ordinated Range Management Planning, which has proven quite successful because it includes all users and interested parties in planning?

Or has the Ministry decided that range management need not be integrated with the balance of forest management?

Two Ministry of Environment documents made public recently raise doubt as to the government's ability to adequately oversee the management of large tracts of Forest land, particularly where the manager of the land may have a single interest and other interests must be imposed. A proposal to delegate habitat management planning to the forest industry, made in late October of 1988 within the Environment Ministry, was based on shocking figures: not enough staff to process logging referrals in Environment or Forests. The proposal dealt only with operational logging referrals, and the writer of the paper mentioned other "initiatives with major implications for habitat management," including conversions of other forms of tenure to TFLs, which would result in major impacts to fish and wildlife, needing to be addressed.

The other paper, written by the director of Wildlife for the Ministry of Environment, said flatly, "We have rarely been worse off." He meant worse off in the ability to act as stewards to our environment, and he also stated, "There are insufficient staff or funds in the Fish and Wildlife Branch in regions to do even a passable job of commenting on forest and mining industry activities." How then can the government oversee single interest management of our forests to assure that fairness obtains? What kind of sustainable development will the government be able to direct when it is already so short-staffed as to be unable to steward our environment? Does the government have a sincere interest in uses other than timber for our forests, when it allows the Ministry of Environment to have less than 20 people in the province to set standards, review, evaluate progress and investigate any complaint surrounding TFLs?

Small loggers in my constituency have also raised concerns about increased tenure through TFLs. They are not allowed to apply for TFL tenure, nor to increase their Annual Allowable Cut, although the applications by the two big operators in our area indicate increases in cut. Small loggers and mill owners need to be assured that they will have continuing access to good timber as well as poor -- and they do not see big companies taking TFLs on poor forest land. "They'll get the prime timber, and the scrub will be left behind," one operator told me. Although small timber operators are beginning to roll, it's still "tough slugging" and they need some good timber. Any increase in cut should go to open bidding.

Small operators are concerned that natural disasters striking TFL operators would be offset by sharing the balance of the cut in the Timber Supply Area, but that losses outside of TFLs would not so likely be compensated by sharing the cut of TFL holders.

In conclusion, Mr. Minister, may I entreat you to review the reasons that government went to volume-based tenure rather than land-based tenure? It allows government, which has a mandate to regard all interests, to integrate forest use and manage for all. Handing over management to a single interest gives away the opportunity to assure balance and achievement of the criteria for sustainability that our citizens demand. If the government is committed to multiple use of its forests, and sustainability of development, it cannot within reason move to major increases in TFL tenure. There are many ways to improve forest management -- a Ministry goal for this proposal -- other than to give it away.

Anne Edwards, MLA  
Kootenay