



The following is the Federation of British Columbia Woodlot Associations' submission to the public engagement regarding improving wildlife management and habitat conservation in British Columbia.

Woodlot Licences (WL) are small, area-based forest tenures. There are 861 WLs located throughout the province. Most are located around or in close proximity to communities and residential areas. The maximum amount of crown land that can be included in a WL is 1200 hectares in the interior and 800 hectares on the coast. Approximately 55% of WLs include land owned by the woodlot licence holder. By definition and in practice, each WL is its own sustainably managed forest unit. Each has its own allowable annual cut and approved Woodlot Licence Plan (WLP) which describes the applicable practices, results, measures and strategies. The WLP is requirement of the *Forest & Range Practices Act* and must include spatial information showing areas where timber harvesting will be avoided or modified to meet an objective or objective set by government.

The Forest and Range Practices Act (FRPA) and Woodlot Licence Planning & Practices Regulation (WLPPR) include many requirements to protect, manage and conserve wildlife habitat. One of the objectives set by government under the WLPPR is to conserve wildlife habitat in terms of amount of area and distribution of areas, and attributes of those areas for

- the winter survival of specified ungulate species,
- the survival of a species at risk, and
- the survival of a species of regionally important wildlife.

providing the minister responsible for the *Wildlife Act* notifies the holder of

- (a) the species, and
- (b) indicators of the amount, distribution and attributes of necessary wildlife habitat.

The problem is that this provision is rarely, if ever, used. Instead, Government Action Regulation (GAR) orders, land use objectives and general wildlife measures designed for large tracts of land and usually with little or no thought given to the applicability and suitability to small, already sustainable managed parcels of land located in close proximity to settlement areas and infrastructure are applied to WLs.

From the Federation's perspective, forest and wildlife habitat management on WLs would be improved if licensees were given the option to propose woodlot specific strategies and practices; including giving due consideration to the silvics of the species, forest health, fuel loading, stand level diversity, ecosystem resiliency as well as values which the public expects and demands such as right of access, recreation, safety and wildfire prevention. Wildlife is not the only objective that applies to WLs. Habitat management needs to be more cognizant and sensitive to social licence.

FRPA and the WLPPR provide for doing a significantly better job of managing for wildlife habitat on WLs than is currently the case. In the Federation's opinion, the above-noted provisions should be employed more often.

With respect to the broader landscape, the Federation is of the view that managing for wildlife habitat has become too much of a singular or dominant objective without due regard for other resource values and FRPA objectives. All too often, a static reserve, retention-based management approach is used and this leads to stagnating stands characterized by aging trees prone to forest health problems, excessive fuel loading, and forests that are more susceptible to the adverse effects of climate change.



For example, consider the condition of the ungulate winter ranges (UWR) in the Cariboo and the extent to which they contributed to the spread, volatility and intensity of the 2017 wildfires and are contributing to the current Douglas-fir bark beetle epidemic. These UWRs are part of fire-based ecosystems; many of which overlap wildland urban interface areas. Most of landscapes had been subjected to fire prevention and suppression activities for the past 80 to 100 years so when the UWR were established there were fewer natural openings, more trees and more large, older trees than would have been the case if natural processes had occurred. As these stands have evolved over time, understories are dying off, older trees are being attacked by bark beetles, fuel loads (ladder, fine and large fuels) are accumulating and the risk of wildfire is increasing.

The wildfires destroyed or seriously damaged many UWRs. Douglas-fir bark beetle infestations are at epidemic levels, which is also causing habitat loss. The beetles and wildfires are indicators that forests on fire-based ecosystems being managed for retention are not sustainable. To make matters worse, some UWRs are acting as epi-centers from which beetles spread and infest nearby forests.

The Federation believes that the province needs to research and develop new management strategies for wildlife habitat that give more consideration to silviculture, how forests develop, and the recruitment of habitat over time. Forest health and overall condition, including adaptability to climate change, fuel loading and the risk of wildfires are essential considerations especially in areas where there are important societal and environmental values at stake.