

February 29, 2016

Re: BCTS\_PG\_PMP\_16/21

Dear Larry Fielding,

I would like to register my opposition to BC Timber Sales' proposed "Pest Management" Plan (PMP).

For starters, Aspen, the principal "pest" it aims to eliminate, is no pest; it is a natural and critical part of our forests. Neither BC Timber Sales nor the government have the moral, ethical, or intellectual right to call it so, this designation simply being a reflection of what industry exists in Prince George at this time, a designation determined behind closed doors with no public or First Nations consultation. Nor does this designation give any serious consideration of how these so-called "pests" can benefit the very forests this plan seeks to enhance through their elimination.

Deciduous (broadleaved) trees such as Trembling Aspen, Paper Birch, and Cottonwood have the highest biodiversity values in our forests. Many species that are in decline, such as pollinators and ungulates, depend on them. Not only do many species feed directly on these trees, but when mature they support an understory that is equally important. Many of these understory plants do not exist in mature conifer plantation forests. Yet forest industry and BC Timber sales, despite giving lip-service to the importance of biodiversity in this PMP draft, and in previous PMP's, in turning our region into an expansive conifer plantation, is engaged in a wholesale campaign against these trees, and in turn against these species, which is shocking in its magnitude and effectiveness. Whole clones of aspen are being decimated in practically every cutblock in the area I'm familiar with southwest of Prince George (Refer to first 1.5 minutes of referenced video). I'm aware this is happening elsewhere in greater frequency, especially north of town. The extent of this problem has been documented in Forest and Range Practices Act Report number 14, which states monocultures of conifers have increased in the Prince George areas most heavily harvested over the past 20 years by 9%. This is substantial and given the ongoing rigor at eliminating broadleaves, it has only gotten worse.

How does this happen? Well, there are no requirements that any aspen, birch, or cottonwood trees be preserved on a block and it is completely legal and standard practice to kill every single one (they are a "pest" after all). Often, if a patch remains, they return and spray the rest in the following years. While often some aspen survive, they remain stunted and no longer thrive. There are many blocks where there are next to no aspen, despite the neighbouring stands having many. This has been documented in BCTS blocks, despite previous PMP's commitment to so-called biodiversity. This is biocidal in scope and has major impacts on biodiversity in all sprayed "plantations," many of which I have toured, and whose desolate, lifeless effect leaves me shaking my head at the intelligence and ethics of our government and the forestry profession at large, who see such sterile, effectively "weeded" forests as a good thing (watch 1:45 to 2:00 of referenced video).

At a bare minimum, there needs to be minimum deciduous component requirements in all cutblocks for wildlife, not just where it is “feasible”. This will send a message to practitioners that the complete destruction and elimination of these trees is not acceptable. The current culture within the reforestation industry sees a monoculture of one or two conifer species without a single broadleaf “weed” as a success and an exercise in good forestry. It is not. Either in wetter areas, in contiguous bands throughout a block, or on the perimeter, we need to start requiring aspen, birch and cottonwood. This is not only beneficial to wildlife, but can help make forests less prone to wildfire and possibly insect infestations (Refer to 2:13 of video, where a brushed pine plantation was destroyed by the Little Bobtail fire, but which was stopped in its tracks by a strip of unbrushed, aspen dominated regrowth). Again, this should be a minimal requirement.

Sadly, most practicing foresters seem comfortable with this stripping of the natural diversity of our forests. I suppose it comes from their Association of BC Professional Forester's handbook, which, in scenario 11.3.2.B attempts to mislead its readers into believing the following statement is true:

*“The scientific research for the herbicides being used does not indicate long-term toxicity or detrimental environmental impact.”*

Any policy that eliminates the broadleaves from our forests will have a detrimental and long-term environmental impact and any statement such as that above is ignorant of how our forests work, simply does not associate species richness with their concept of the environment, or in greater likelihood is actually making a political statement rather than a scientific one. There is no question that a conifer forest that has been “managed” will have far fewer species, and far fewer species that the public and First Nations value, such as moose, than a natural one, where aspen regrowth is a natural part of the forest's cycle, despite misleading claims to the contrary.

It is a good time to re-approach political beliefs such as those held by the ABCPF; we are currently experiencing a catastrophic loss of species across the planet. If we claim our forests are sustainably managed, and if the BC Forester's profession is to have any legitimacy in the face of the decline, they need to consider the biodiversity values of the trees and plants that the law currently requires to be eliminated, and develop provisions to maintain them. The fact that a mixed forest is illegal in BC, and the fact that to my knowledge, the ABCPF has said nothing to condemn this, punches some serious holes in the credibility and professionalism of this association. Creating a forest that is impoverished in life, in complexity, in biodiversity, and in adaptability is poor policy from all perspectives other than a softwood multinational's, and probably even from their's in the long-term. It should be unacceptable.

Why do we instead try to discredit anyone who disagrees with the almighty “plantation?” Where does this adulation of the plantation come from? Your letter says its to optimize growth of crop trees and by this we can assume the goal is to maximize jobs from the landscape. Perhaps it is beyond the scope of this letter, but if the goal were jobs, we

wouldn't be shutting down profitable mills such as Clear Lake who employed many people, while expanding computerized supermills such as Polar at Bear Lake, which do not. According to my calculations, due to the efficiency of the mill at Bear Lake (ten times the production with roughly 1/4<sup>th</sup> the workforce; I'm being generous, it is likely less), you have to cut 40 times more wood to employ the same number of people who used to work at Clear Lake. Turning our diverse forests into monocultures of mostly pine trees (the tree with the lowest biodiversity value in our forest) is not about jobs, anymore than modernizing a mill is. It is for the profits of large forestry corporations whose concern for local communities is only a pecuniary one. If it was cheaper, all the logs would be shipped south or overseas for milling, as a growing amount already is. Make no mistake about that.

Regarding the specifics of vegetation management, your letter mentions animal grazing, manual brushing and the like, but this is inaccurate. Sheep grazing has been more or less eliminated because it costs too much. I know this because I know one of the pioneers in the field, Dennis Loxton, who last I heard is unemployed. I don't think he appreciates literature mentioning animal grazing as a control method when in reality it is only carted around in writing to create a veneer of humanity to the callousness of what is pest management. And then you have manual brushing in the Prince George area, which is next to nothing. So let's be accurate. The primary method of "pest management" is to fly around in a helicopter and broadcast spray every last living plant with a probable carcinogen at twice the rate used in agriculture. As someone who has seen the results of this and has been sprayed documenting it, it's as bad as it sounds. Plus, it is legal to spray wetlands, marshy areas, creeks, etc, on the questionable presumption that they are "seasonal" and that they do not bear fish (refer to 1:50 to 2:00 in video). I'm sure you're aware of Purnima Govindarajulu's 2008 report for the Ministry of Environment pointing out that forestry herbicide spraying of amphibian habitat is legal, does occur, and is a credible threat to amphibian populations, another keystone species in decline (evidence the above quote from the ABCPF handbook could benefit from). Please note that while your draft PMP plan claims to respect waterways with pesticide free zones, there remains no requirement that you not spray seasonal or marshy areas that are prime amphibian habitat but which do not support fish, as my reference video clearly demonstrates, with the total decimation of the small pond I documented.

I don't want to believe that we do this because as a species, we have little care for the life we share this planet with, but sometimes I doubt myself. If I were being completely honest, as somebody who loves nature and the animals that thrive there, and one who finds joy in the plentitude of other animals this wonderful planet supports, to witness the wanton destruction and limitation of this life for such poor, clinical, reasons as listed in your letter is nothing less than depressing and discouraging. I can only presume those doing this don't yet understand what it is they are doing, or have perhaps been indoctrinated by the ghosts of yield-obsessed German forestry (Germany, by the way, has abandoned monoculture conifer forestry, the model modern Canadian forestry has adopted, and now requires broadleaf/conifer mixtures in reforested areas by law).

Let's return to the whole designation of a naturally occurring tree species as a "pest." How much more befuddled can the logic of government and industry get than to justify the conversion (via a "systematic process" no less) of rich natural forests to much more limited plantations of one or two tree species simply because industry has not invested in the infrastructure to utilize this tree? I'm sure you're aware that an unsprayed forest will have greater biomass and produce more trees of all species (albeit fewer pine) than a monoculture of straight pine. If we figure out how to use aspen, we'd have higher yields from the forest. Not to mention a more diversified product base. It makes no sense to determine what is or is not a pest based on what industry currently exists (which seems to be the sole criteria by which aspen is designated a pest). The fact that Lodgepole Pine was once considered a pest should be enough proof. Markets, products, and industry can change. Anytime you see a paralam beam with a Weyerhaeuser stamp, note that this product is made from aspen. It is the government's job to think about other possibilities and have some foresight. This policy of spraying broadleaves serves nothing other than a few companies who don't want to spend the money on new machinery to process aspen. And it is doubtful in the long run that it even serves them.

It may fail to serve even industry because creating conifer monocultures could be incompatible with the major issue not discussed in the draft PMP: climate change. This entire plan is being conceived in the vacuum of climate change denial for a few reasons. If climate change were considered, you'd realize that an unsprayed forest, due to the sheer volume of greenery and biomass, is sequestering more carbon at a quicker rate than a dessicated pine plantation. An aspen tree stores 45% more carbon than a pine and 25% more than a spruce (Refer to "BC Forest Carbon Offset Investment Opportunities" reference). And they grow quicker, not to mention the huge volume of understory that thrives under aspen. The result is greater soil development sequestering more carbon. Furthermore, forests with higher aspen content reflect more solar energy, especially in winter. Recent studies have shown the expansion of conifer forests in Europe, due to their darker colour, absorb more solar energy, and contribute to global warming more than the expansion of deciduous forests would (Refer to "Conifer Forest Expansion Blamed for Boosting Global Warming" reference).

Even if the goal of our forests is not to help the planet cool down, then it makes good sense to adapt our forests to a warming planet, as it surely is. Planting only a couple of conifer species who have proven to already be susceptible to a warming planet and the pathogens it accelerates is not an adaptive policy. We need greater biodiversity in our forests, not less. And this includes today's so called "pests."

To summarize, so long as the goal is to rid the forest of naturally occurring and ecologically critical tree species because someone (who?) has called them a "pest", this Pest Management Plan has zero moral and zero intellectual license. If we were to take the biodiversity crisis seriously, purposely altering our forests whereby critical species are eliminated would not be legal, and would not be supported by the ABCPF. Consequently, I do not support this plan in its current state and would request that it be revised to specifically require the existence of the broadleaf component in a portion of all cutblocks where they naturally grow, a place they rightfully hold, and a place that poses

no threat to the economic future of our region, if anything being a net benefit. These broadleaf components should be required along watercourses, marshy areas, or in contiguous belts throughout a cutblock or landscape to resist wildfires or pathogens. It is poor policy, both from a climate change adaptation, economic diversification, and ethical standpoint, to have a policy that legalizes and effectually encourages the elimination of broadleaf trees from our forests, along with the countless species, the birds, bees, and moose, that depend on them, along with the many direct benefits of these trees to forest health, forest productivity, and a diverse and resilient forestry.

Thanks for reading,

James Steidle  
Stop the Spray BC

Reference:

video reference:

"Unwanted Forest Silent":

[www.stopthespraybc.com](http://www.stopthespraybc.com)

"BC Forest Carbon Offset Investment Opportunities":

[http://stopthespraybc.com/wp-content/uploads/2011/07/carbon\\_investment\\_opportunities\\_info\\_book.pdf](http://stopthespraybc.com/wp-content/uploads/2011/07/carbon_investment_opportunities_info_book.pdf)

"Conifer Forest Expansion Blamed for Boosting Global Warming"

<http://stopthespraybc.com/wp-content/uploads/2011/07/%E2%80%9CConifer-forest-expansion-blamed-for-boo...ming-Technology-Science-CBC-News%E2%80%9D.pdf>