

April 24th, 2011

Rick Fraser
BC Timber Sales
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Prince George, BC
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RE: Pest Management Plan

Dear Rick,

Thanks for asking for our feedback on this plan. Considering the importance of this plan to the forests, ranchers, public and wildlife in the area, it is a good time to put some thought into the merits and issues associated with the policy of vegetation management and the free growing rule that requires it. We've taken some time and put some of our concerns together, along with some of the research our son James has done on this question.

Our first concern is the impact of aerial spraying to kill "pest" plants including fireweed, clover, grass, aspen, birch and cottonwood on range tenure licenses. By law we have a lengthy list of obligations to manage our cattle on crown land. How can we be expected to manage our animals on this land when the crown actively kills the forage our cattle rely on? We pay the crown to use this land to graze our cattle. It's counterproductive to kill the grass that we pay to use, a concern shared by many cattle ranchers in this area.

Secondly we have some concerns about the environmental impacts. Recent news articles have raised a whole range of concerns about the use of glyphosate, a summary of which you can review in the attached Vancouver Sun article. It reduces biodiversity, kills flowering species that wild bumblebees and our honeybees rely on, and affects the food supply of wildlife like moose and deer. It also kills frogs, a concern that Dr. Purnima Govindarajulu of Frog Watch BC argues in a 2008 report. The EPA is now raising similar concerns.

All of this for what purpose? The Pest Management Plan claims that aspen, birch, shrubs and species like fireweed "inhibit plantation establishment," "hinder optimal growth and development of crop trees," and "prevent a stand from achieving free growing." In conversations with a number of top forestry researchers throughout the Central Interior, however, this does not seem to be the case. Here's a brief list of quotes obtained personally and those who said them:

- "In the end there was hardly any difference in how long it took the stands [that had not been sprayed] to reach maturity." Dr. Suzanne Simard, forest science professor at UBC.
- "The impact of vegetation control wasn't all that exciting," Dr. Chris Hawkins, former UNBC professor.

- “Based on my research there were places where I had controls and treatments and there was no difference in the growth. So in fact in a lot of cases the (vegetation management) treatments were unnecessary.” Craig DeLong, Ministry of Natural Resource Operations in Prince George

The small differences that were recorded in some cases as the result of broadleaf competition were offset by greater hardwood volume and higher wood quality. Dr. Hawkins again:

- “You lost twenty years [out of a 120 year cycle for the spruce] but you still had the birch there and you had better quality trees because of the [natural] pruning, earlier crown lift, less taper, and smaller knots.”

Not only is it unproductive commercially and damaging to wildlife, it undermines the future health and yields of our forests.

Vegetation management is helping create monocultures of limited conifer diversity that are increasingly prone to disease. Mountain Pine Beetle, Pine Terminal Weevil, and Western Gall Rust epidemics all increase in the pine forests where broadleaves like aspen were eliminated through some method of vegetation management, according to the recent works of Dr. Simard and some of her colleagues.

In their studies, published late last year in *the Canadian Journal of Forest Research*, *the Forestry Chronicle*, and *Silviculture Magazine*, these insects and diseases have led to a fifty percent failure rate in close to one-third of all new pine plantations in the Southern Central Interior. Seventy percent of Lodgepole Pine plantations are now failing in the most productive interior cedar-hemlock zone.

The most surprising results concern the Mountain Pine Beetle. According to their study, **vegetation management appears to increase the odds of a MPB infestation by a factor of ten.** These results will grow worse and spread further north as temperature increases. Nicholas Coops at UBC predicts that Lodgepole Pine will begin to decline across its present range in B.C. as the century progresses. Leaving the aspen and birch may be a good hedge against this possibility, or at least slow it down.

Consequently, this “pest” management plan has some problems. It is counterproductive to ranching, harmful to wildlife, and artificially alters the shape of our forests towards monocultures of species with a questionable future for no particularly good reason at all. It serves no purpose to us, our environment, the forest industry, or to our society as a whole.

Finally, it appears there is some shift in the government’s policy on this issue that perhaps could be taken into account before this plan is approved. In comments published in the current issue of *Silviculture Magazine* Chief Forester Jim Snetsinger, in response to Dr. Simard’s work on the increasing failure rate of our herbicide-treated conifer

monocultures, outlines a number of government initiatives to address this situation, including increasing the species diversity in our new forests. Here's what he says:

"Species diversity is an important part of risk reduction, biodiversity and climate change adaptation and mitigation in forest management."

I hope the Pest Management Plan takes this growing body of scientific evidence and these shifting policy directions into account before it goes ahead with approval.

Walter and Susan Steidle

James Steidle

CC:

Hon. Terry Lake, Minister of Environment
Hon. Steve Thompson, Minister of Forests
Jim Snetsinger, Chief Forester
Manuel Mariotto, Ministry of Environment
Harold Johnson, Range Officer