Diane Nicholls, ADM Chief Forester PO Box 9352 STN PROV GOVT, Victoria, BC, V8W 9M1

Dear Ms. Nicholls

I am writing to express my support for the initiative to **Stop the Spray of herbicides in BC Forests**. Despite the mounting evidence showing that glyphosate based herbicides and their largely untested additives may be cancer causing and are certainly dangerous to wildlife and toxic to amphibians and fish, it seems that letters of intent to spray herbicide on certain areas within the Prince George Region have already gone out once again to stakeholders. This is unacceptable. It is time for this outdated and dangerous practice to end.

I realize that the reason for herbicide treatments is to ensure that tree plantations reach free to grow status in a timely manner. The Forest and Range Practices Act lays out the management practices for commercial species like pine, spruce or Douglas fir, while non-commercial species like birch or aspen must be eliminated if their stands are larger than 2 ha or 5% of the cut-block area. However, this practice promotes a monoculture type conifer stand that is exponentially more flammable than the deciduous forest types that are eliminated, and which is devoid of biodiversity and wildlife. It needs to be updated to meet environmentally sound objectives as well as the reality of warmer summers and increased wildfire risk.

Deciduous species like aspen, birch and cottonwood perform a whole range of ecological services that are sidestepped when we kill them with herbicides or brushing. I believe that current legislation (FRPA) or commercial species designations must be adjusted to allow for an increased percentage of broadleaf and brush species in logged over stands for the following reasons:

- 1. They nurture more species of wildlife than pure conifer forests, providing food for moose and deer and habitat for birds, small mammals, amphibians and insects.
- 2. Slower to burn and resistant to insect infestations, buffers of aspen across the landscape are thought to slow the spread of pine beetles and limit the damage of forest fires.
- 3. Deciduous species play an important role in soil regeneration and nitrogen fixing, enhancing soil productivity through decomposition of leaves. Studies suggest that mixed forests of aspen and spruce will produce greater biomass over several rotations than pure spruce forests of the same density.
- 4. Carbon sequestration is greater in stands containing deciduous. Aspen trees store up to 45% more carbon than Pine and 25% more than Spruce. In addition, the lighter colored leaves help to reflect more sunlight keeping the understory cool in summer and warmer in winter.
- 5. Improve biodiversity on the landscape and forest health overall.
- 6. Have commercial value and can help diversify our forest industry and product base

In summary, I implore the ministry to **TAKE ACTION** and immediately stop the spray of herbicide in BC Forests. It is a dangerous and toxic practice which has far reaching impacts on wildlife and wildlife habitat and may be hazardous to human health as well. (please visit this link to substantial research on the toxicity and carcinogenicity of glyphosate - https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/roundup-cancer-study/). I also suggest that the Forest and Range Practices Act be updated to allow for a greater percentage of deciduous species to be left on the landscape which will improve the biodiversity and overall health of our forest resource while increasing protection from disease, insects and fire.

Respectfully,