

FRPA discussion Paper Submission by www.boundaryalliance.org July 2019

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Our opportunity to comment on these issues is always an exercise in déjà vu and a reminder of Government failure to adequately address public concerns including our own, which are detailed in previous multiple submissions and articles on our website.

A primary focus of our concerns has been cattle use and abuse of public lands. This discussion paper and various past discussion papers fail to acknowledge the ecological absurdity and public cost absurdity of continued use of public land for cattle grazing. While Government ignores and avoids such discussion it has effectively allowed the cattle industry longer tenures, virtual autonomy over grazing practices and provided various gifts to industry that perpetuate the damage to public resources and public cost.

Our website has documented the damage and costs for more than 12 years. In that time range conditions and various damage from cattle on public land has worsened. Numerous articles on our website document the damage, the failure of Ecological/Ecosystem Restorations, water contamination (see our multiple reports) cryptogamic soil loss and other damaging consequences of public land cattle grazing on our Range Cattle Impact page:

https://www.boundaryalliance.org/ba_008.htm

To take the issues back further, we include as Appendix A, a response to a Range Review from a local wood lot operator from Feb 1989. Many years ago he outlined the absurd economic costs of cattle grazing effects and costs on tree and seedling damage, public fencing costs, effects on water quantity and quality, on forage and on wildlife. He missed the weed problem, largely cattle generated, but is well aware of it now. The problems described years ago remain, plus.

This writer's involvement in stream protection and other environmental issues also goes back more than 40 years and I have seen few improvements and many growing problems in Range Management and elsewhere.

Our direct comments on the discussion paper are primarily focused on Range Issues.

Climate Change and Resilient Landscapes.

Remove the cow. Ecological and public costs far exceed economic returns from an industry which only exists from the passing on (externalizing) of economic and environmental costs, massively exceeding the impacts of alternate protein, pig, chicken and the exploding (competitive) availability of vegetable (meat substitute) proteins. See Cattle Impacts Global and Local. https://www.boundaryalliance.org/cattle_impacts.pdf

Improved recognition of the need to control bugs through removal of snow press and windthrow trees while providing salvage costs that will encourage such removal. Numerous downed trees in the Boundary remained on the ground following a wind storm, providing bug nurseries, while District Manager complained of a lack of authority to compel removal/utilization. See Professional Reliance submission: <https://www.boundaryalliance.org/professionalreliance.pdf>
Willingness to engage with private landowners to treat bug infestation and limit spread.

Fire. The elephant in the room, the primary wildcard (at least until the next threat that we haven't thought of comes along ¹) which can and will disrupt all plans. Management of fire and the probability of increasing incidents makes it a management priority. Unfortunately the seasonal nature of wildfires brings on a brief flurry of concern and then actions and concerns mostly disappear until the next season.

When we do hear proposals from officials, consultants, contractors and "experts" we usually hear "simple" solutions that fail to address the complexity of wildfires and mostly address the issue from the narrow lens of a particular interest.

We have experts in fire advocating for treatment that effectively destroys habitat values for wildlife and likelihood of any future marketable timber.

We have advocates for "let it burn" that fail to recognize the public cost, houses and infrastructure and the wildlife costs while claiming that fires improve wildlife habitat.

We have advocates of fire breaks who fail to recognize that fire starting embers frequently travel many kilometers.

We have advocates for so called Eco-restoration projects who claim fire and wildfire benefits, frequently contrary to actual results. See Ecosystem Restoration: Is it Working?

<https://www.boundaryalliance.org/jcparkcombined.pdf>

Advocates of all kinds for tree removal, thinning, brush removal from which they profit while ignoring negative consequences.

We recommend that high levels of scrutiny and skepticism be brought to the table in wildfire planning, that there are no fireproofing methods broadly applicable or that give extended protection.

Meanwhile we suggest enhanced fire fighting detection, equipment and planning be a priority.

As with bug infestations Government must be prepared to engage with private property owners to control infestations, fires and any other environmental threats.

On the detection front, we have a web page designed to enhance public awareness of lightning strikes and potential fire.

Lightning and Wildfire Page https://www.boundaryalliance.org/ba_032.htm

Landscape Level Planning.

While proposals for landscape level plans suggest a collaborative process with various stakeholders, the reality of such discussions is usually the extractive stakeholders in a majority, looking to preserve/enhance their interests while trying not to step on the interests of fellow exploiters and initiate mutual criticism, In such discussions it is not in the interests of extractive stakeholders to speak to the public interest and while processes usually manage to include some malleable entities (enviros) to supposedly address the broad public interest, they are usually government funded or dependent entities who can be relied on not to rock the boat. Any worthwhile process must be guided by the necessity to halt environmental degradation.

Roads: While noise about excess roads has increased in recent years, little has actually been done. A significant hindrance to effective road management and reduction of roads has been years of Professional Reliance. This writer initiated a resolution through Kettle Wildlife Association which was approved by BCWF in May 2019 which would return oversight of logging plans, and resource roads to Regional Biologists and District Managers with authority to protect the public interest. While this would have some possible effect on limiting new roads, effective deactivation (it mostly is not) rehabilitating, recontouring, restoring and replanting significant portions of new roads, (only cost effective if required at the planning/permit stage) and closed (posted) areas. FPB reports have discussed these needs in detail and are partially quoted in our Resolution:

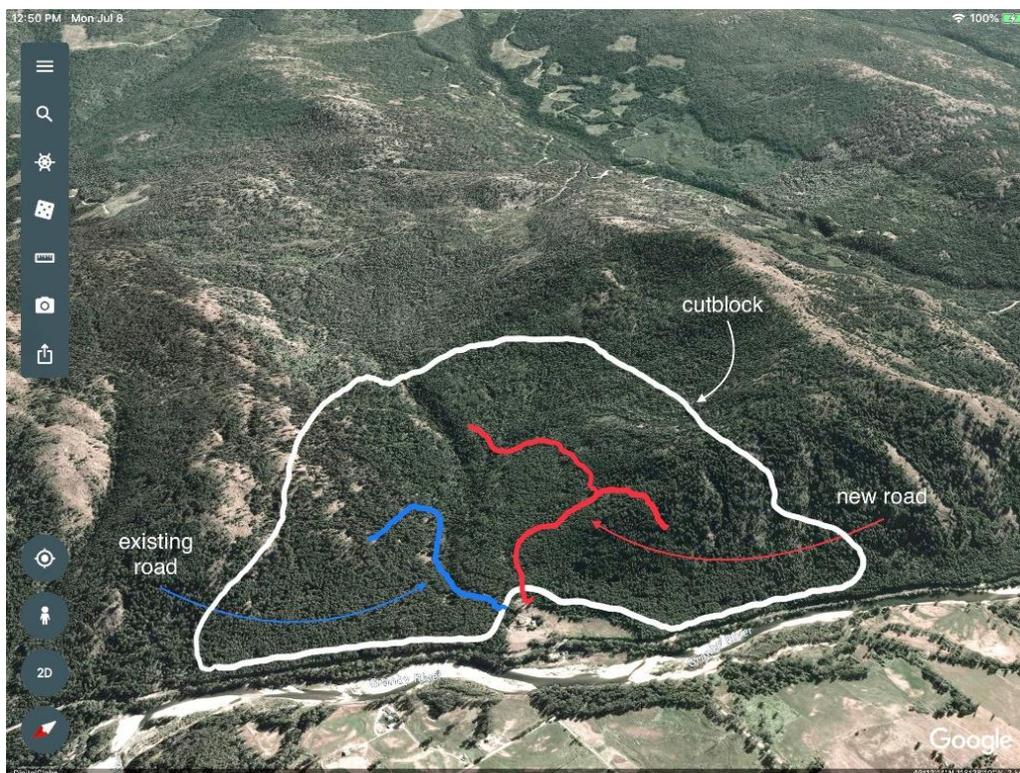
¹ The Fifth Risk, Michael Lewis

<https://www.boundaryalliance.org/kwaresolutioncombined2018.pdf>

Public Trust.

Yes public trust is important and the statement in the discussion paper “While forest and range practices are generally sound” is a false claim that ruins credibility immediately. The discussion paper suggestion for transparency and public participation in planning is suspect in view of the above. Change is sorely needed and in Range use, should require immediate availability (online) of Range Plans and Range use Permits and Grazing Schedules as a publicly available resource. Such Plans should also be available for review by and input from interested/affected parties. The secrecy/privacy issues raised to prevent public access are a sham. Range Branch has for years denied or placed obstacles and costs in the way of access to such information despite representations from FPB and Environmental Law advocates. Despite FPB concerns, Government has granted longer Permit Terms and effectively given autonomy to the industry for Range oversight. Provisions need to be put in place for potential review/cancellation of permits where damage is apparent.

Forestry Plan access would be improved by requiring public availability of 3D views with superimposed detail of cutblocks, roads, other as in following example.



example only, not representational. This type of imagery is recommended in addition to flat maps.

A sad lack of information has been the norm in past years with only major extractive stakeholders seemingly informed of plans. Examples include so called Range improvements,

water access and fencing initiatives for cattle interests that have potential impact on neighbouring properties, wildlife, other tenure holders, public health and the public interest in public land.

Stewardship.

The discussion question asks what additional values should be considered in FRPA...

The most important aspect relating to Range Use is the need for a complete economic analysis of range cattle use on public land to price economic and environmental costs against so called benefits, accounting for the fact that health costs now need to be included in any analysis (as made clear in various UN and other reports) and that such analysis needs to factor in lost opportunity costs and the fact that replacement of (range subsidized) cattle protein with less costly alternatives is already well under way. Past analysis by the industry and Range staff and others tied to the industry have misleadingly exaggerated benefits and vastly understated or ignored costs or the extent to which those costs are externalized. Suggested reading, all articles on our web site not already link provided.

Oversight and Accountability.

The discussion paper claim as to FRPA role to date fails to acknowledge that FRPA guidelines to date while promising to protect resources, has failed to do so. Oversight by FREP has also failed to protect resources. FPB, while providing some useful overview reports on Range but usually fails to confirm causes of specific damage complaints over lack of specifics in legislation or lack of conclusive evidence of damage/source/cause which are otherwise quite evident to the public. The latter point is moot as FPB has no mandate or authority to penalize or require change by perpetrators or the relevant departments or ministries. If those having oversight lack enforcement powers, the oversight will continue to be ineffective.

The use of the word "balance" in governance is troubling. "Balance" in resource use questions, usually favours exaggerated claims of economic/job benefits at the expense of some "acceptable" amount of environmental impact or damage. Ignoring cumulative impacts, every past and subsequent resource use or development also takes its bite of "balance" out of the environment, The tattered remnants of this constant "rebalancing" is more and more evident.

Appendix A

A review of Range Practices from 1989 which helps to illustrate that the problems with cattle use of public land are as bad or worse than they were many years ago despite various initiatives to "improve" management.

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February 22, 1989

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FILE # PUBLIC'S VIEW'S ON CROWN RANGE MANAGEMENT PROGRAM

Dear Sir

Please consider the following view points in the proposed range review.

- a) Economic return to the crown and ultimately the voting public.

From the figures given in the discussion paper of "The Range Management Program" the average area required for on A.U.M. is 8.3 hectares with a revenue of \$1.30/AUM. This gives an average yield to the crown of \$0.157 per hectare. When this is compared to the yield to the crown from the forest industry it is obvious that the return to the taxpayer is very minimal. Using an average stumpage rate generated by the small business program in our area of \$8.50/M3 with M.A.I. of 2.4 M3/year gives a yearly yield of $(\$8.50 \times 2.4 \text{ M3}) = \20.40 per hectare. If a forested area is intensively managed the volume yield can realistically have a M.A.I. of 5M3 per year. This would give a yield to the crown of $(8.50 \times 5) = \$42.50$ per hectare. Obvious the yield from forestry has a much more favorable return to the crown than grazing does. When there is a conflict between grazing and forestry obvious a land use decision should favor the forestry aspect.

When planting of seedlings is required, the grazing of these areas becomes a game of deficit budgeting in terms of a cost benefit. An one year old seedling costs approximately \$0.50 per tree to grow and plant. Average site preparation costs add a further \$0.11 per tree to have a cost of \$0.61 per tree just to get the tree in the ground. It is obvious from the above figures that if a bovine tramples or browses one seedling in 3.9 ha.

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there becomes a negative cost benefit of grazing the area.

If a larger seedling is needed or special site preparation is required, then the cost increases. This same scenario is applicable to natural regenerating well spaced stems. A small germinate will be killed by trampling, without one being able to measure the damage as it dries up into nothing in a matter of hours. Cattle exclosures established in the Boundary T.S.A. in 1985 proved this beyond a shadow of doubt. At one exclosure in Boundary Creek, after two weeks of grazing following planting, 35% of the seedlings outside the exclosure had some form of damage while 0% damage was noted inside the exclosure. At another cattle exclosure in Trapping Creek after one grazing season on a new plantation, 64% of the stems outside the exclosure had some form of damage, while only 2.4% of the seedlings inside had some damage. Damage inside the exclosure can be attributed to wildlife while the majority of the damage outside the exclosure can be attributed to grazing by cattle. With this level of damage occurring to seedlings that are already 30 cm tall one does not have to have a wild imagination to speculate on the damage done to new natural germinates that are 2 cms. tall.

The long term effectiveness of the mulching capabilities of a bovine can be demonstrated by looking at riparian zones that were logged in the 1940's and have had continuous grazing ever since. Although there is an ample adjacent seed source, all that remains to date is tombstone stumps as a reminder of the site's capability for growing trees. As soon as one gets off the flat ground onto the side hills the area has fully regenerated itself. Mother Nature is very forgiving of man's intrusions into a natural forest but she has to be given a opportunity to heal herself. The only foreign element that has continuously been added to these stump farms is the grazing of cattle. I am very confident also that if a soil specialist was to examine these areas, he would determine the extent of soil compaction that has taken place over the years. Incidentally these areas were horse logged so equipment can not be blamed for the compaction. If one looks at the actual ground pressure of a bovine hoof (70-80 lbs. per square inch) compared to the ground pressure of a crawler of 7-10 lbs per square inch it becomes evident as to the source of a large portion of the soil compaction in our most productive soils in our riparian zones.

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b) Economic cost to the crown

The returns from the grazing fees do not even cover the cost administrating the program, let alone pay for all range improvement projects. The taxpayer is having to subsidise a small percentage of the total farming community. The range fees should be similar to the value of private pasture (\$7.00 to \$10.00 per A.U.M.) to put all the ranching community on the same economic level.

c) Economic cost to non-farming land owners.

The economic burden to private land owners owing land adjacent to crown range is highly unfair and extremely expensive. If a land owner does not want range cattle grazing on his private land he has to fence the common boundary between the crown land and the private land at his own expense. IF the common boundary between two private lots requires fencing both private land owners are required by law to share the expenditure. There is no justification for the crown not having the same responsibilities as any other individual or corporation. At the present the crown is generating revenue by renting out their land to individual farmers without any consideration given to the hardships incurred to a much larger number of individual land owners than range permittee's. Any time there is a complaint about cows bothering people the response is "Tough, if you don't like it, fence your property, that is the Law." The "Grazing Community" hides behind this outdated law all the time. I sincerely hope that this section of the Range Act is revised and reflects the changing face of the rural landscape. It should be noted that it is not just the cost of constructing a fence, but there is a considerable expense borne by the land owner to maintain and replace the fence over a long period of time. It should also be pointed out that, indirectly through land taxes, the government is renting private property to the land owners at a much higher cost per hectare than a grazing permit generates. Perhaps the government should pay more attention to that segment of society that is paying the lions share of the costs.

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d) Negative impacts from grazing range land.

Small highly productive fishery streams are extremely sensitive and experience continual annual destruction during the dry season from range cows. A small herd of cattle can literally drink a small spring fed pool dry and the fingerlings die before the system can recharge itself. What the bovines don't drink, they stir up so much mud and animal wastes that the fish simply can not survive long enough for the system to cleanse itself. I have personally seen this happen a stream in the Sandrift Lakes area of the Boundary T.S.A. Incidentally this stream is considered to be a critical fishery stream by the Ministry of the Environment and logging along the creek was restricted.

Water quality for domestic use is highly compromised especially in the dry season when cattle congregate in all the valley bottoms and literally live in the creeks. I think it is safe to say that if a health inspector was to inspect the majority of our creeks in mid-summer that the verdict would be that the water is not fit for human consumption. The continuous erosion of stream banks caused by cattle trampling and caving in the established soil and rooting edge of creeks should be of serious concern to anyone trying to protect the environment.

Wildlife in a crown range area is significantly impacted upon by range cattle. As I understand the most productive wildlife areas are in the riparian zones along water ways.

These areas happen to coincide with the heaviest use from grazing cattle. Critical nesting and hiding cover is trampled into the ground. Wildlife family units are undoubtedly continuously upset when cattle are grazing within close proximity to established rearing areas. Also a considerable number of ranchers are lobbying to have the hunting season shortened up to allow their cows on the range longer.

Forestry values and production is compromised by the concept that grazing of domestic stock over the entire T.S.A. must be accommodated even in areas that were not traditional grazing areas prior to logging. Some of the extra costs incurred by the logging industry are slower cycle times for logging trucks because the cattle tend to camp on the dusty roads when they are not grazing and trampling seedlings. The ranching community is continuously

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wanting the forest industry to buy and install steel cattleguards, metal gates, build cattle escape routes along steep cut banks, dig water holes, and in some cases even oil logging roads so the cows don't have to stand in the dust.

e) Economics of Ranching

The economics of the ranching industry are discouraging at best and devastating at the worst. To encourage young people to go into beef ranching today is economic suicide. There is not a beef farm in the country that can afford to pay for itself if the full investment is calculated without government subsidies. In the Boundary T.S.A. 70% of the existing permitties have outside income usually from the forest sector, another 25% inherited the property and 5% are just barely making a living. The average crown range area required in the Boundary T.S.A. is 4000 ha. If the area required to sustain one family income from beef farming is compared to the area required to sustain the same size of income from a small woodlot or tree farm you would find that four family incomes from a tree farm would be realized.

It is high time that we, collectively as a province, recognize that farming our forests are a more viable farming operation than beef farming. Let individuals compete on a global market in a product that we can be competitive with.

In closing I trust you will give some of the above some consideration. Thank you for giving the taxpayer an opportunity for input into a critical issue such as this.

Yours sincerely

George Delisle