

Key Suggestions for Feedback on Forest Landscape Plans:

SOME USEFUL BASIC FRAMING:

- The province has offloaded conservation decisions onto First Nations, communities and community forests, while avoiding tenure reform. Corporations dominate local forestry decisions and they are obligated to shareholders, not to the public trust.
- Over-harvesting in the Kootenay Lake TSA has depleted primary, old and high-value forest, and left most ecosystems unable to meet even minimum legal old-forest targets.
- The province has stalled on implementation of the Old Growth Strategic Review, the Old Growth Technical Advisory Panel recommendations, the Biodiversity & Ecosystem Health Framework and Species at Risk legislation.

KEY CORE ASKS:

- Objectives must be clear and measurable and include public reporting, compliance checks and enforcement/consequences when necessary. The Ministry of Forests must be put on notice: we will be analyzing the resulting FLP for directional language. The draft FLP we've seen for TFL 37 uses hundreds of soft terms - "can," "may," "seek to," "where feasible/practicable" making compliance questionable and enforcement impossible, especially under the current failed governance system of professional reliance.
- Time-sensitive values like old growth require immediate protection; long-horizon timelines on old growth protections are not acceptable.
- Make Old Growth Deferral Areas (OGDAs) permanent. First Nations in the Kootenay Boundary Region unanimously support deferrals; ongoing incursions (for roads, logging, salvage, wildfire-risk reduction) infringe on DRIPA and erode public trust. No further incursions while FLPs are underway.
- Prioritize intact/sensitive watersheds; rare, unique or under-represented ecosystems and critical habitats.
- Map, fully retain and legally protect all old growth and high-ecological value primary forest to meet ecologically based targets. Legally protect it before operational planning; buffer it and link it to parks, Old Growth Management Areas, Ungulate Winter Range, and other reserves.
- Do not count forests in Old Growth Management Areas as old growth unless it actually meets old age criteria.
- Connectivity corridors are critical for wildlife movements, dispersal, gene flow and population viability. Connectivity is currently treated as a conceptual objective only. Connectivity mapping

(in the context of cumulative impacts) must be finalized and resulting corridors must be defined and enforced.

- It is unacceptable to change the definition of what makes up the Wildland Urban Interface (WUI.) The WUI is the zone where human development meets with undeveloped wildland vegetation. The WUI is generally accepted as within 1km from infrastructure, and at the most 2km yet BC Timber Sales has signalled they are greatly expanded the WUI to help them gain social and legal license to log in sensitive watersheds.

Of course there are so many other important points. But this list summarizes what we think are the most critical things to bring up.