



BRITISH COLUMBIA CATTLEMEN'S ASSOCIATION

Representing the Beef Cattle Industry of British Columbia

AGRI CENTRE - #4 - 10145 DALLAS DRIVE, KAMLOOPS, B.C. V2C 6T4 PHONE (250) 573-3611 FAX (250) 573-5155

January 17, 2023

Christopher Cooper

District Manager

Ministry of Forests - 100 Mile House Natural Resource District

PO Box 129

100 Mile House, BC V0K 2E0

Christopher.Cooper@gov.bc.ca

BCCA File: 2023-003

SENT BY EMAIL

Dear District Manager:

I am writing this letter on behalf of the British Columbia Cattlemen's Association (BCCA) to comment on a determination that was made in December 2021 to delete a portion of Crown range from Grazing Licence RAN076345 (Canabo Cattle Co. Ltd.).

The BCCA fully understands and supports the need to protect stewardship objectives as defined under the Range Planning and Practices Regulations (RPPR). In the case of overlapping tenures there are additional management complexities for both the tenure holders and the Ministry of Forests.

The District Manager is empowered under Section 36 of the Range Act to delete land from a Crown Range tenure to improve efficiency of resource use. Reductions in range tenure areas can have a significant impact on the cost structure of a ranch even if allocated AUM's are unchanged and there is compensation for range developments. RUP changes can be problematic as specific pastures are often utilized within the grazing sequence for a specific purpose, not to mention that changing the movement habits learned within a cow herd is challenging. For these reasons, and in consideration of the objective set by Section 7 (f) of the RPPR that outlines the need to consider the range tenure holder's costs ("to be vigorous, efficient and world competitive"), deletion decisions need to be enacted judiciously. Robust data collection related to defined stewardship objectives needs to be part of this process.

Although it is possible that we have formulated an opinion based on incomplete information, it seems odd that your staff's 2020 East Coulson Range Inspection indicated there were no significant stewardship concerns (forage utilization was low to moderate September 15, 2020) but the District Manager included a statement in his deletion order that referenced his range staff discussions of an "upcoming decision beginning in November of 2020". First of all, the inspection report is inconsistent with the District Manager's deletion notice of the East Coulson Range specifying the deletion was required for stewardship objectives to be met. Secondly, it concerns us that district range staff were discussing a change to the tenure two months after a report that indicated there were no stewardship issues. Again, we fully support protection of defined objectives, but urge statistically sound data collection to justify significant reductions to range tenures in the name of stewardship. As forage production is highly variable, data is preferably collected over several years to account for changes in precipitation, and years like 2021 that were wrought with challenges to keep animals safe from fires should be excluded. The provincial Range Branch describes a rigorous data collection process prior to making a change to a range tenure and it does not appear this policy has been followed.

When changes to range tenures are necessary, we favour a joint discussion with all impacted parties in an effort to reach a mutually agreeable solution. It is noted that there was an attempt to bring parties together, and it is unfortunate that scheduling issues prevented all parties from attending on the chosen date.

Finally, we are concerned about the process used to determine that a 29% reduction in range tenure area would not have an impact on allocated AUM's to Canabo Cattle Co. It would be our expectation that such a determination would require both inventory and projection modelling to determine forage production capability in the immediate future and in the longer term. In reviewing the background information to this file, it is not apparent that was done.

We appreciate the complexities involved with balancing resource values, particularly in the case of overlapping tenures, but urge diligence with respect to science-based data collection and consideration of short and long term implications to both resource values and tenure holders.

Sincerely,



Brian Thomas, President
British Columbia Cattlemen's Association

Cc The Registrar, Forest Appeals Commission
PO Box 9425, Stn. Prov. Govt., Victoria, BC V8W 9V1
Email: FACinfo@gov.bc.ca

Regional Executive Director, Josh Pressey
Email: Josh.Pressey@gov.bc.ca

Canabo Cattle Co. Ltd.
6526 Little Green Lake Road, 70 Mile House, BC V0K 2K1
Email: Canabocattle@gmail.com

Range Branch Director, David Borth
Email: David.Borth@gov.bc.ca