



BRITISH COLUMBIA CATTLEMEN'S ASSOCIATION

Representing the Beef Cattle Industry of British Columbia

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December 11, 2023

Keith Atkinson, Chair
Forest Practices Board
PO Box 9905, Stn. Prov. Gov't.
Victoria, BC V8W 9R1

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SENT BY EMAIL

Dear Mr. Atkinson,

RE: BC Cattlemen's June 2023 Range Tour

The BC Cattlemen's Association would like to thank you and your board for joining us for the range field tour in Savona B.C. in June of this year. We appreciated the opportunity to showcase some of the issues and opportunities faced by our sector and are grateful to your board for the time they took and the interest they showed.

We want to highlight a few of the issues that we profiled at various locations on the tour and that our sector continues to grapple with, which we have included as an appendix to this letter. We hope that these provide you with useful information and things to consider as you move ahead with your scope of work.

One of the topics we discussed at several sites on the tour was wildfire and its impacts on the landscape and our sector. We would like to commend the FPB on the release of your report on landscape resilience and wildfire. Our sector echoes the observations that the FPB has made about factors that have contributed to present elevated wildfire risk and was very encouraged to see the focus on the need for an all-of-society approach to reducing stored fuel and creating conditions for resilient landscapes. We have sent a letter to Minister Ralston, expressing our appreciation for this work done by the FPB and offering encouragement to the Ministry to respond to and take action on the many concrete recommendations made.

We appreciate the opportunity to engage and to have dialogue on topics and hope to continue these important conversations moving forward. If your board is interested in future tour opportunities, we would be pleased to work with staff on an agenda and location that would be high value and interest to you.

If at any point we can provide you with more information, please do not hesitate to reach out to our office.

Sincerely,

Brian Thomas, President
BC Cattlemen's Association

Encl./1 – Key Takeaways from the Tour

Key Takeaways from the BCCA Range Tour – June 14, 2023

Key Takeaways from the BCCA Range Tour – June 14, 2023

1. Water Storage:

Water in BC should be thought of as a seasonal good; mostly coming in the winter and spring. Water storage, therefore, is essential to ensuring that there is consistent supply to support the variety of values that rely on available water throughout the year, including agriculture. Water storage is increasingly being recognized as critical for ecosystems, our economy and as a key asset in our changing climate and calls for more water storage on the landscape are mounting.

Ranchers rely on a sustainable and consistent water supply for a variety of important reasons, including water for irrigation and water for livestock and are the largest group of water storage licensees, under the *Water Sustainability Act*; with the sector holding upwards of 1500 individual licenses.

Stored water comes in many forms, from small dugouts to larger reservoirs, and require different management and infrastructure depending on the type and context and often require dams or other structures to ‘hold the water back’. The cost and the liability associated with these structures falls exclusively on the dam owner, which is most often the rancher.

Many of the water reservoirs that are used and enjoyed by others in society are actually irrigation lakes – including Tunkwa and Leighton Lake, which were featured in the FPB Range tour of June 14th 2023.

As a result of recent regulatory changes, new requirements to consult Indigenous groups, increased material costs and general uncertainty, many ranchers are being forced to or are entertaining the option to decommission their dams rather than bear the unaffordable, ongoing costs and uncertainties. At a time when calls for more water storage on the landscape are increasing, we need to create conditions to support this by ensuring that existing licensees can shoulder the costs, administrative burden and liabilities associated with these dams.

BCCA is working with other dam owner groups, such as Ducks Unlimited Canada who also hold many storage licenses, and government to make the cost and liability burden a better reflection of the broad stream of benefits that water storage provides society and not disproportionately felt by ranchers.

2. Managing Water Infrastructure:

There are many tasks associated with managing water infrastructure for ranchers, including routine maintenance, management and inspections of things like dams and diversions, as well as the need to conduct lifecycle maintenance and upgrades to infrastructure. All of these tasks are costly and time-consuming.

Ensuring that ranchers have access to their dam infrastructure to conduct required routine maintenance and management activities is critical. Maintaining critical infrastructure like access roads and passage through gates is essential in these cases.

With nearly 10,000 new kilometers of resource roads in BC each year and the many impacts they have on the landscape, ranchers understand the need to limit the number of new features on the landscape, and that some roads may need to be decommissioned. However, roads and trails are essential infrastructure for ranchers in BC; critical for accessing our range and important infrastructure like fences and water infrastructure like dams and diversions, managing cattle and ensuring the safety of people and livestock in emergencies. It is important to note that many roads and crossings have existed for over a century and are used by a variety of stakeholders.

The decommissioning of some critical roads has significant impact to ranchers' ability to manage water infrastructure, other range infrastructure like fences as well as creating negative impacts to range activities more broadly like the movement of cattle. Decommissioning roads and bridges also take away from critical infrastructure to respond to emergency events including wildfire and flood, compromising effectiveness, human and animal safety.

While the BCCA recognizes the legal and moral requirement to engage with Indigenous Communities, requirements for archaeological assessments for existing dams during lifecycle maintenance has created tremendous costs and uncertainty for dam owners, further complicating and delaying the ability to manage water for rancher.

BCCA is working with government on developing a consistent, expedited and streamlined approach to Indigenous archeological assessments with costs associated with them being shared more broadly across society, not just borne by the rancher. Furthermore, it would be preferable if assessments on existing infrastructure like dams could be prioritized and conducted in advance, to expedite the process in the case of required maintenance or upgrades so as not to lose critical opportunities to capture and store water.

Additionally, the BCCA understands the desire to limit linear features, but the current system does not adequately consider the needs of range licensees. Range tenure holders must be better and consistently consulted and their interests must be fully considered in decisions around the placement of new roads and the decommissioning of existing ones. There is opportunity to better accomplish this in the context of the new Forest Landscape Planning model, but more explicit direction is required to ensure that this occurs effectively and consistently across BC.

3. Livestock Water:

Access to consistent, high quality water sources is critical for livestock production and animal welfare on all types of range tenures. While essential, it is critical to note that the amount of water that cattle use on range is very small when compared to other uses; a mere fraction of a percent of the overall water used in irrigation provincially and much less than what is lost to evaporation. Given that livestock use has occurred since water consumption and use has been recorded and regulated, the use of water by livestock can be considered as part of the 'baseline'; not a new draw on the resource.

In dealing with government, Ranchers have always been assured that access to adequate water was implied in their range license; to issue a license to AUMs (forage) without a source of water is an impossible prospect. During the modernization of the *Water Sustainability Act*, ranchers were again assured that there would be protections put in place to recognize ranchers right to water through their various grazing permits through regulation. Unfortunately, despite BCCA engaging with the province in good faith, there is an outstanding need to enshrine these rights into a mechanism that effectively supports the interest of ranchers and secures access to livestock water.

The BCCA has been urging the province proceed with the development of a regulation that enshrines producers rights to livestock water. Furthermore, this provision needs to be administratively simple and not impose significant time or financial burden on ranchers.

4. Forage, range health and resilience:

‘Forage’ is a term that refers to a variety of plants, including grasses and forbs, that create the backbone of the ranching sector in BC. Forage can be thought of as the diversity of plant material that can be found ‘between the trees’. Over and above grazing, forage also supports numerous other values, including carbon capture and storage, soil health, hydrological and biochemical processes, cultural values, as well as the provision of food and habitat for wildlife.

Ranchers in BC rely on forage quality and quantity over time to support our operations. Despite years of advocacy that maintaining and building forage supply be a provincial priority, forage continues to be overlooked as an important value in planning and management decisions on BC’s public lands. It is notable that, despite explicit direction in section 4 of the Ministry of Forest and Range Act¹ to ensure a productive and profitable range sector², very often forage values are not considered and upheld in planning or decision making. Over the past years, public lands have been managed in a way that focused on timber values, often at the expense of forage.

¹ https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96300_01

² **Purposes and functions of ministry**

4 The purposes and functions of the ministry are, under the direction of the minister, to do the following:

- (a) encourage maximum productivity of the forest and range resources in British Columbia;
- (b) manage, protect and conserve the forest and range resources of the government, having regard to the immediate and long term economic and social benefits they may confer on British Columbia;
- (c) plan the use of the forest and range resources of the government, so that the production of timber and forage, the harvesting of timber, the grazing of livestock and the realization of fisheries, wildlife, water, outdoor recreation and other natural resource values are coordinated and integrated, in consultation and cooperation with other ministries and agencies of the government and with the private sector;
- (d) encourage a vigorous, efficient and world competitive
 - (i) timber processing industry, and
 - (ii) ranching sectorin British Columbia;
- (e) assert the financial interest of the government in its forest and range resources in a systematic and equitable manner.

Ranchers and logging co-exist in harmony, to a great extent in BC. In fact, the ranching sector *relies* on the forest sector to open forage resources in landscapes that are more traditionally higher timber density. With normal cutting and reforestation cycles and intervals on the landscape, new cut blocks are often important resources for cattle to use forage. While the BCCA appreciates the need for reforestation on the landscape, as part of the timber industries contractual obligations supporting the renewable resource. Standard silviculture practices are a cause for concern for many ranchers in BC, with specific issues most often centering on:

- Stocking density (too many trees per hectare, resulting in a closed-canopy and limited forage)
- Site-prep (creating hazard to people and livestock, creating conditions for the introduction of invasive plants and creating access issues on range for ranchers)
- Species composition (monocultures are notably less resilient)

Forest activities also create concerning significant impacts to hydrology on range. This is primarily due to roadbuilding and ditching practices, which essentially impose a system of drains on the landscape. This has widespread ecological impacts that affect ranchers and the resilience of the entire landscape.

Logging practices also have significant impacts on soil. Disturbed soils are very vulnerable to the establishment of invasive plants. Ranchers are concerned that there is not enough vigilance from the forest sector in adhering to requirements to re-seed disturbed sites. This has a significant and negative impact on the ecosystem.

In cases where there is widespread harvest over a short period of time (Eg: wildfire and insect-kills), there are concerns that stand density and age will limit forage production in the medium term considerably.

BCCA has engaged in many pilot projects that aim to support both timber and the forest sector interests. On the FPB tour, we viewed one such example where a silvo-pasture model was achieved on a lease tenure through selective logging practices.

BCCA is optimistic that the FLP process will help recalibrate the balance between timber and range sector interests. Moving forward, it is imperative that forage values be prioritized through planning, policy and the application of laws and regulation and that mechanisms be put in place to ensure this is the case.

The BCCA has urged government to enforce the requirement for forest licensee to re-seed all disturbed soils (blocks, landings, road, cuts) in a timely manner to prevent the spread of invasive plants.

The BCCA urges government to Promote a paradigm shift that requires hydrological restoration on forest landscapes, not just simply silviculture and road decommissioning.

5. Wildfire Impacts:

The BCCA recognizes that wildfire is an essential part of our ecosystems and that fire-deficits have created conditions where burns are more frequent and more severe in recent years. While ‘Good fire’ is valued by ranchers and recognized for its ecosystem rejuvenating benefits; ‘bad fire’ –

characterized by high intensity and extensive impacts - can have very negative impacts to range values like forage, soil health and hydrology and to ranch businesses.

Unfortunately, as with other sectors in society, ranchers have a front-row-seat for the many and increasingly volatile natural processes like wildfire and many ranchers have experienced catastrophic fires on their ranches in the past years, which have resulted in a variety of challenges for ranchers including, but not limited to:

- Cattle losses
- Losses of infrastructure (corrals, fences, water infrastructure)
- Loss of stored feed and pasture (often a multi-year impact)
- Impacts to natural range barriers.
- Cost of temporary relocation of livestock, including the transportation of livestock
- Impacts to range because of soil disturbance from emergency operations, roadbuilding and fireguards.

Government support for ranchers, both within the immediate crisis and in the aftermath of crisis is essential. Without this support, many ranch businesses would be unable to survive given the huge costs associated with impacts and losses.

The incidence of wildfire on rangelands often results in salvage harvest of timber, which can exacerbate the usual concerns ranchers have with forest practices and hydrological impacts.

The BCCA continue to work with the province continue to support ranchers as they grapple with the multiple and complex implications of wildfire; paying attention to the needs of producers both during active crisis management and in the ensuing recovery and rebuilding period.

The BCCA urges that areas and range tenure that have experienced wildfires should be prioritized for Forest Landscape Planning to ensure that range interests are carefully considered in restoration activities.

6. Fencing:

Fencing is critical infrastructure for ranchers, enabling the effective and efficient management of cattle, the implementation of best range management and stewardship practices on the landscape as well as ensuring the safety of livestock and people. Many ranchers are responsible for the maintenance of several hundred kilometers of fences on their ranches; making fence management a very large part of a rancher's work.

In recent years, there has been a considerable increase in the cost of fencing materials and availability issues for fenceposts and other materials are a major challenge and some producers are experimenting with different types of fences, such as single-strand electric fences as a way to reduce cost.

Depending on the location of the fence, different parties bear the cost of materials. Fences on public land are owned by the crown and are typically managed by the licensee as a condition of their tenure. Over the past decade, with the uptick in the number and severity of wildfires, impacts to fences have been considerable, leaving many ranchers with ranges that they are unable to use until

infrastructure is repaired or rebuilt. Delays are common on account of limited budgets, material availability and regulatory requirements, including the requirement to consult Indigenous communities and these delays have been very challenging for some producers; some waiting over 5 years to see their infrastructure rebuilt.

BCCA administers a fencing program that helps to rebuild and repair fences to the Ministry standard fencing specifications and there may be opportunities to create efficiencies by developing different Ministry fencing specifications for specific situations, including creating an electric fencing spec.

The BCCA is working with the province to prioritize the lifecycle maintenance, repair and rebuilding of range fences by ensuring adequate funding, creating efficiencies in permitting and working with the BCCA to source materials. Additionally, the BCCA suggests that the province should look at ways to expand their toolbox to increase impact and reduce costs by developing more context-specific standard fencing specifications.

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