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Brian Barber, RPF
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Ministry of Forests and Range (MoFR)
PO Box 9518 Stn Prov. Govt
Victoria, BC V8W 9C2

Via email: brian.barber@gov.bc.ca

Dear Mr. Barber:

Re: Comments on MoFR Report: Preparing for Climate Change

The overwhelming scientific consensus is that the global warming we are presently experiencing is due to human-caused factors. In turn, climate change presents significant risks to the forest ecosystems of BC. West Coast Environmental Law welcomes the MoFR's recognition of these two key realities.

We anticipate making more detailed comments on these issues in the context of the Draft Recommendations associated with the Future Forest Ecosystems Initiative; however, we wish to bring three key concerns with the May 18th *Preparing for Climate Change* report to the attention of MoFR at this time.

1) BC must to set binding, enforceable limits on greenhouse gas emissions that will reduce provincial emissions over time to a small fraction of 1990 levels. Recognizing that the terms of reference for the task team emphasize adaptation, its recommendations must be put in the context of the urgent need to address the root causes of climate change. The task team is mandated to develop a communications and extension strategy “for raising awareness of climate change impacts, mitigation measures and adaptation options.” We recommend that this be used as a tool to increase awareness throughout the provincial government of the present and projected impacts of climate change on forests, and the urgent need to ensure that all provincial initiatives (e.g., with respect to oil and gas development, electricity and transportation) are part of the solution, not part of the problem with respect to reducing greenhouse gas emissions.

2) Managing for ecological resilience must be given top priority in responding to climate change, and the current provincial forest management framework must be adapted to reflect this priority. This means making management choices today that are most likely to maintain ecosystem composition, structure and functions within their natural range of variability in the face of increased stress and disturbance from climate change.

However, “many of the most severe impacts of climate-change are likely to stem from interactions between threats... rather than from climate acting in isolation.”¹ Such impacts include habitat loss and fragmentation from other human activities,

¹ Chris D. Thomas et al, “Extinction risk from climate change” (2004) 427 Nature 145 at 147.

including logging and related road building. Thus, other measures to reduce pressure on biodiversity, such as lower harvest levels and interconnected protected reserves, constitute important climate change adaptation measures.²

The May 18 *Preparing for Climate Change* report come close to completely ignoring such adaptation options. Existing laws and policies and BC contain instances where decision-makers are not only permitted but directed to manage forest ecosystems outside the range of natural variability.³ This must change. While we are still learning about the full impacts of future climate change of BC's forests, we can make management choices today that maximize options for the future. This means, at a minimum, ensuring that landscape patterns and stand structures left behind after logging are compatible with the range of natural variability. It also means a greatly increased system of protected areas with connectivity between them.

At present levels of harvesting in BC the May 18 report is misleading when it suggests that that most of BC's forests will have the opportunity to "adjust autonomously to climate change without human intervention" (at iii).

3) In preparing for climate change, MoFR must look beyond the trees to the whole forest ecosystem, including the ecosystem patterns, functions and processes. With the exception of a very brief section on "non-timber values" the May 18th report seems unduly focused on commercial tree species and the timber values of forest ecosystems.

As noted in the Appendix to the companion MoFR *Future Forest Ecosystems* paper, management for ecological resilience includes maintaining biodiversity at all levels, and maintaining ecological patterns and processes at the full range of spatial and temporal scales. This is essential if we hope to have future forest ecosystems in BC that can sustain human communities and economies, as well as other species and ecological services.

We understand that the subsequently released document *Future Forest Ecosystems of BC: Draft Recommendations for Review and Comment* is intended to be the overarching framework for MoFR's response to ecological change resulting from global warming. Thus, the absence of meaningful discussion or cross reference to the objectives set out in the *Future Forest Ecosystems* document in the May 18 *Preparing for Climate Change* report is perplexing. All recommendations in the May 18th report should be reassessed in light of the subsequent *Future Forest Ecosystems* report and comments received on it.

Sincerely,
WEST COAST ENVIRONMENTAL LAW



Jessica Clogg, Staff Counsel

publicat/briefs/2006/jc31climatechangeMOF.doc

² UNEP, *Climate Change and Biodiversity: Executive Summary of the report on Interlinkages Between Biological Diversity and Climate Change* (CBD Technical Series no. 10, 2003).

³ For example, current policy direction that only 10% of subregional planning units are to be managed with a high emphasis on biodiversity, and approximately 45% assigned low biodiversity emphasis, where "pattern of natural biodiversity will be significantly altered, and the risk of some native species being unable to survive in the area will be relatively high." *Biodiversity Guidebook* (MOF, 1995).