



November 6, 2024

File: 2018-39

**VIA EMAIL**

Jennifer Psyllakis, Phd  
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Dear Jennifer Psyllakis:

Thank you for responding to the recommendations that the Forest Practices Board made in its *Management of Habitat for Species at Risk under the Forest and Range Practices Act* special investigation report. The Board is encouraged by government's multiple initiatives that target biodiversity, ecosystem health, species at risk listing updates, and land use planning and monitoring. We agree that these initiatives, with timely implementation, can work collectively toward long-term habitat supply and potential recovery.

Recommendation #1 - Update the policy framework for managing habitat of species at risk.

In its report, the Board clearly identified what the key components of a policy framework for species at risk should be, including setting clear objectives and intended outcomes, providing clear direction on which tools should be implemented and when, supporting an integrated approach to habitat protection, and promoting the use of best management practices and innovation.

Government's intention to apply forest landscape planning (FLP) and land use planning (LUP) to develop and implement objectives for species at risk is an excellent approach, which can be informed by updating the Categories of Species at Risk and Regionally Important Wildlife. Although the Board views the collective initiatives as encouraging, it is notable that many are very high level and the Board will be interested in how those changes will be implemented at the operational level. Government's commitment to update the Identified Wildlife Management

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Strategy to address habitat supply can be an important part of a policy framework aimed at the operational level.

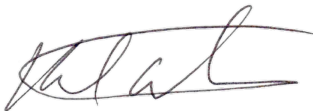
Recommendation #2 - Provide a transparent process for how and when government makes decisions to balance timber supply and habitat protection.

The Board is pleased to see that government is considering using modernized LUP to set objectives for large-ranging species on the landscape. This approach could provide opportunities for habitat recovery for these species as well as potentially conserve habitat for multiple species at risk that use smaller areas of the same types of habitat. By setting objectives in a land use plan, forest landscape plans should then be expected to incorporate those objectives for a given landscape.

The Board acknowledges that the land use planning processes will take time to develop. Government has committed to developing guidance to apply socio-economic cost-benefit analyses to decision processes that balance habitat protection and timber supply; part of that guidance development is setting objectives for species at risk and wildlife habitat, with monitoring and adaptive management to ensure objectives are met. The Board remains interested in understanding how a transparent, integrated approach will guide economic focus to pivot from harvesting old and mature forests to innovative forest practices. The timing for policy change is very much at hand and can address the pressing need to mitigate ongoing risk of loss to those valued habitat features on the landscape.

The Board will continue to monitor government's progress toward implementing a policy framework for species at risk and the development of transparent decision-making processes to balance timber and habitat supply. Thank you for your response to the Board's recommendation. We now consider this file closed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Atkinson', written in a cursive style.

Keith Atkinson, RPF  
Board Chair

cc. Richard Manwaring, Deputy Minister, Ministry of Forests  
Shane Berg, Assistant Deputy Minister and Chief Forester, Ministry of Forests  
Briar Young, Executive Director, Forest Practices Board