Forest Practices Board

File: 97325/20-2006-05

January 16, 2009

Sharon Glover
Chief Executive Officer
Association of BC Forest Professionals
1030-1188 West Georgia St.
Vancouver, BC V6E 4A2

Dear Sharon Glover:

Re: Response to the Board's High Retention Harvesting Report, SR 20

Thank-you for your response of September 8, 2008 to the Forest Practices Board recommendations in our special investigation report on High Retention Harvesting on the BC Coast. Since we received your letter, we have made revisions to the report in response to issues raised by Interfor, and have just now reposted the report on our website. We very much appreciate the involvement of the association in the discussions that have taken place regarding the report revisions.

As these revisions did not affect our original recommendations, we accept your July letter as the association's response. We are pleased that you are working with industry and government to strengthen professional practice and implementation to promote sound stewardship of our forest resources.

Thank-you for your attention to these issues, and for informing us of your progress in addressing them.

Yours sincerely,

Bruce Fraser, PhD
Chair

Forest Practices Board

File: 97325/20-2006-05

October 3, 2008

Doug Konkin
Deputy Minister
Ministry of Forests and Range
PO Box 9525 Stn Prov Govt
Victoria, BC
V8W 9C3

Dear Doug Konkin:

Re: Response to the Board's High Retention Harvesting Report, SR 20

Thank-you for your response of July 30, 2008, to the Forest Practices Board recommendations in our special investigation report on high retention harvesting on the BC Coast. We are pleased that government has recognized the issues raised by this investigation, and is working with industry and the ABCFP to respond.

The Board would be interested in an update on progress in both the strategic direction for high retention harvesting and the discussion paper on appropriate stocking standards. I will have staff follow-up in a year or so to check on progress with the ongoing initiatives.

We recognize that this is a complex issue and that adaptive management will be an important consideration in finding solutions. We hope our report does not lead to a stifling of innovation or a prohibition on the practice of high retention harvesting or the use of multi-story stocking standards while guidance is being developed. We fully appreciate that trade-offs must be made between the economic benefits of harvesting and the environmental and social constraints some of these sites can pose, but we believe those trade-offs should be made explicit where they are the reason for the harvest system.

Yours sincerely,

Bruce Fraser

Bruce Fraser, PhD
Chair

Forest Practices Board

File: 97325/20-2006-05

January 16, 2009

Doug Konkin
Deputy Minister
Ministry of Forests and Range
PO Box 9525 Stn Prov Govt
Victoria, BC V8W 9C3

Dear Doug Konkin:

Re: Response to the Board's High Retention Harvesting Report, SR 20

Thank-you for your response of July 30, 2008, to the recommendations in our special investigation report on High Retention Harvesting on the BC Coast. Since we received your letter, we have made revisions to the report in response to issues raised by Interfor, and have just now reposted the report on our website. We very much appreciate the involvement of Forest Ministry staff and executive in the discussions that have taken place regarding the report revisions.

As these revisions did not affect our original recommendations, we accept your July letter as the Ministry's response. We are pleased that government has recognized the issues raised by this investigation, and is working with industry and the ABCFP to address them.

The Board would be interested in an update on progress in both the strategic direction for high retention harvesting and the discussion paper on appropriate stocking standards. I will have staff follow-up in a year or so to check on progress with the ongoing initiatives.

Yours sincerely,

Bruce Fraser

Bruce Fraser, PhD
Chair

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Dr. Bruce Fraser, Chair
Forest Practices Board
PO Box 9905 St Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Dr. Fraser:

Re: Government's response to recommendations 1, 3 and 4
Special Investigation Report 20, January 2008

On behalf of the Ministry of Forests and Range (MFR), please accept this letter as government's response to Recommendations 1, 3, and 4 included in the Forest Practices Board special investigation report 20, *High Retention Harvesting and Timber Sustainability on the British Columbia Coast (January 2008).*

In developing this response, the MFR considered legislative direction from the *Ministry of Forests and Range Act*, the *Forest Act* and the *Forester's Act* as well as the *Forest and Range Practices Act* (FRPA). It is our view that the issues identified in the report should be addressed in consideration to all of the relevant legal and non-legal tools. We believe this approach is necessary to find the most efficient and effective means of addressing the identified issues.

Recommendation 1
The current regulations and policies do not provide strategic direction to help determine when silvicultural systems and/or harvest approaches with high amounts of retention should be used. The Ministry of Forests and Range should provide strategic direction to guide licensees on appropriate approaches for high retention, based on clear strategic objectives for the full range of values over time, including timber species /values.

Ministry's Response
The MFR agrees that the strategic direction provided in current legislation does not specifically address silvicultural systems or harvesting approaches. The MFR further

Ministry of Forests and Range | Executive
Location: 1520 Blanshard Street, 3rd Floor Victoria BC V8W 3C8
Mailing Address: PO Box 9525 Stn Prov Govt Victoria BC V8W 9C3
Tel: (250) 387-4809
Fax: (250) 953-3687

agrees that lower level strategic direction on a management unit basis would be a valuable tool that the prescribing professional can use when determining which silvicultural systems (and associated stocking standards) should be applied in achieving identified resource values, including timber objectives.

Currently, the MFR is piloting two new strategic plans which focus on the management of the timber harvesting land-base for timber values. As part of the Coast Action Plan, a pilot is being undertaken in the Strathcona Timber Supply Area (TSA). While the pilot is primarily focussed on the transition from old growth timber harvesting to second growth, the concept of this plan also looks at various planning, practices and investment options and could be used to analyse the use of various silvicultural systems to achieve various objectives set by government. Another strategic plan being piloted in the Kamloops TSA is under the Chief Foresters' new Future Forest Strategy. This new initiative will also look at timber management and timber flows more strategically. Both of these plans would feed information into the Timber Supply Review process and may be used operationally in other TSAs at some point in the not too distant future. Subject to ministry decision to implement one or both of these planning tools, we will explore the opportunity to include silvicultural system strategic direction as part of these strategic plan initiatives.

In the interim, the MFR will offer to meet with licensee groups in the Haida Gwaii (Queen Charlotte), North Coast and North Island-Central Coast forest districts to outline the context of the issues identified in the Board report and the implications at the local level, e.g. long term impact on AAC and changes to the operable land base. This discussion will include an opportunity for local licensee steering committee groups to work with district and regional MFR staff to develop strategic plans that set landscape level timber objectives and stand characteristic targets that will guide the implementation of silvicultural systems. This has been done with some success in the Haida Gwaii Queen Charlotte district to address western hemlock sanitation issues and western red cedar management issues and could be extended to other districts to address specific operational planning needs. The goal is to find solutions to address identifiable timber sustainability problems. In addition to efforts to meet with licensee groups at the district level, the MFR will conduct analysis of timber supply impacts associated with high retention silvicultural system application and share this with licensee groups for their operational consideration and incorporation into timber supply reviews.

In support of strategic planning initiatives (proposed and ongoing), the MFR feels that there is a strong need to ensure that we have an ongoing understanding of the nature and scope of the issue and that we are communicating with appropriate forest professionals. As mentioned in the Board report, the MFR (through the CRIT and other initiatives) has been proactive in identifying and addressing this issue. In support of this, the MFR continues to fulfill the following commitments:

- monitoring and promoting professional understanding and application of high retention silvicultural systems by the joint agency/licensee CRIT silviculture working group.
- promoting professional understanding and dialog around the application of silvicultural systems specifying high levels of dispersed retention through the CRIT silviculture working group.

- work with licensees to compile and report stand level retention data, including retention tree pattern distribution, into RESULTS necessary to accurately determine the extent and impact of high retention silvicultural system on timber supply within the Coast Forest Region.
- pilot the FREP "RSM[1] Timber evaluation protocol in partial cut stands" silvicultural system project as part of local monitoring efforts in the Haida Gwaii Forest District.
- conduct Compliance and Enforcement (C&E) free-to-grow inspections on blocks harvested under high retention silvicultural systems consistent with risk rating priority.
- complete C&E staff multi-layer stocking standard free-to-grow assessment training, and
- include MFR/Licensee discussion with respect to high retention silvicultural system stocking standards as part of the FSP approval process.

Recommendation 3

The Ministry of Forests and Range should require clear, achievable and measurable up - front targets for post - harvest retention levels. Stocking standards should require the use of residual basal area ranges with compliance limits at both the lower and upper end. Some characterization of vigour and economic viability should be used to allow trees to contribute to stocking. Ultimately, retention stocking standards must be designed so they can be audited for compliance, and monitored for effectiveness.

Ministry's Response

The MFR agrees that clear, measurable and achievable stocking standards, including retention standards, are important to determine compliance and for monitoring of effectiveness. This issue has been raised and addressed by the CRIT in the form of the *Silvicultural System and Partial Cut Harvesting Issues in the Coast Forest Region DISCUSSION PAPER produced by the Silviculture Systems Issues Working Group of the Coast Region Implementation Team May 15, 2006.* This document was recently endorsed by the ABCFP as an example of how professionals can work together to address FRPA implementation issues. The professional association endorsement of this type of peer reviewed guidance document is a powerful tool for managing implementation issues such as this.

The MFR believes that the multi storied stocking standard designed for a single tree selection silvicultural system in dry belt interior Douglas Fir areas (see *Reference Guide to Forest Development Plan Stocking Standard*) is being used inappropriately in the coast region. It is the intention of the MFR to edit the reference guide to address high retention silvicultural system stocking standard in coastal applications. To do this, the MFR will rely on the efforts of the CRIT. As part of its 2008/09 draft Terms of Reference, the CRIT has identified the development of a peer reviewed stocking standards discussion paper to be tasked to the silviculture working group. The CRIT will be asked to provide direction to the silviculture working group to address high retention silvicultural system applications or other intermediate cutting applications with no regeneration obligation.

[1] Resource Stewardship Monitoring

The CRIT will be asked to confirm the following direction to the silviculture working group:

- identify an appropriate stocking standard or set of stocking standard development principles for high retention silvicultural systems on the coast.
- develop an appropriate survey methodology to accurately describe and measure post harvest stand structure of high retention silvicultural systems. The new survey methodology will assist with compliance inspections and effectiveness evaluations.
- request ABCFP to endorse this discussion paper and survey methodology upon completion and acceptance by CRIT.

Recommendation 4
The Ministry of Forests and Range should develop policy about 'opportunity cuts' with no expectations of future yield (and therefore no silvicultural system) which could be considered, for example, in areas constrained from harvest due to other objectives, such as slope stability concerns.

Ministry's Response
The MFR agrees that guidance concerning the concept of "opportunity cut" where either a physical or non-timber value precludes the application of a silvicultural system with a reasonable chance of success. Key to determining success is a need for sufficient information to help professionals balance forest values (economics, environmental and social).

The concept of "opportunity cut" is not new and has been discussed as part of workshops specific to partial cutting. Most recently, a CRIT sponsored field based training session, specific to high retention silvicultural systems, held in Tofino in October 2007, discussed opportunity cutting in some detail. As a result of one of the recommendations from the Tofino workshop, the CRIT tasked the silviculture working group to develop an "opportunity wood" options paper. The purpose of the paper is to provide information and options on how opportunity cutting may be managed in the Coast Forest Region. A number of issues and considerations concerning the feasibility and implications of opportunity cutting will be presented as well as management options to be considered. The final paper will be presented to the Coast Region Management Team for consideration and implementation decision by November 2008 and may be used to develop policy around opportunity cutting.

Response Summary
As discussed above, many of our response commitments are associated with efforts already initiated. In order to ensure that we follow through on all commitments, the MFR will carry out an annual review of the status of these commitments and will develop workplan(s) specific to commitments as necessary.

Additional Comments
In addition to the three recommendations addressed in this letter, the MFR would like to offer support to the concept of more discussion about the quality and diligence professional foresters put into the development and implementation of high retention silvicultural systems

(Board report recommendation #2). As part of the MFR process of responding to the Board report, we noticed several opportunities for professional reliance to be used to address the issues identified in the report. Through the CRIT, the MFR has been and will continue to work closely with the ABCFP to strengthen the professional reliance and accountability foundation critical to supporting the FRPA legislative regime.

Thank you for the opportunity to respond to the Board report recommendations. Please be assured that the MFR understands the nature of the issues identified in the Board report and has been taking steps to address them. This is evidenced in the Chief Forester's March 12, 2008, letter addressed to coastal licensees and licensee groups that discusses these issues and lends support to the efforts of CRIT. It is noted in this letter that we are seeing meaningful changes in the field based largely on professional dialogue and willingness of professionals to learn from their colleagues. I believe this type of approach is working to ensure appropriate forest management.

Please contact the Forest Practices Branch member Dave Weaver (250 387-4768) or the Coast Forest Region team of Chuck Rowan (250 751-7096) or Craig Wickland (250 751-7094) with any questions or requests for additional information.

Yours truly,



Doug Konkin
Deputy Minister

pc: Honorable Pat Bell, Minister of Forests and Range
Tim Sheldan, ADM, Operations Division, MFR
Lorne Bedford, A/Director, Forest Practices Branch, MFR
Dan Graham, Director, Compliance and Enforcement Branch, MFR
Jim Langridge, Director, Resource Tenures and Engineering Branch, MFR
Jim Gowriluk, Regional Executive Director, Coast Forest Region, MFR
Dave Bewick, District Manager, North Coast Forest District, MFR
Len Munt, District Manager, Haida Gwaii (Queen Charlotte) Forest District, MFR
Andrew Ashford, District Manager, North Island-Central Coast Forest District, MFR
Dave Weaver, Forest Practices Branch, MFR
Chuck Rowan, Coast Forest Region, MFR
Craig Wickland, Coast Forest Region, MFR