



FOREST PRACTICES BOARD	
NOV 07 '05	
RECEIVED by:	
Original	<i>ben</i>
File #	<i>040555</i>
ACTION:	COPIES:
<i>RT</i>	<i>Bruce</i>
<input type="checkbox"/> NIA Int:	<input type="checkbox"/> FYI Int:

*Sent to Rob as R.jpg*

File: 36030-30

October 27, 2005

Bruce Fraser  
Forest Practices Board  
PO Box 9905, Stn Prov Govt  
Victoria BC V8W 9R1

Dear Bruce Fraser:

**Re: Response to recommendations arising from Complaint Investigation 040555, Logging and Conservation of Endangered Plant Communities on Vancouver Island**

Please accept this letter as my response to the Board on recommendations in the Forest Practices Board (FPB) report on Complaint Investigation 040555, *Logging and Conservation of Endangered Plant Communities on Vancouver Island*. I am responding specifically to recommendations #4 and #5.

FPB Recommendation #4:

*The Board recommends that the Minister of Environment put a high priority on designating those red-listed plant communities in the coastal Douglas fir unit that may be affected by forest management on Crown land as species-at-risk, and establishing wildlife habitat areas for those species.*

The Identified Wildlife Management Strategy IWMS Version 2004, as originally proposed, and that was supported by all stakeholders, contained a list of 85 species at risk. In May 2004, the Minister of Environment (formerly Ministry of Water, Land and Air Protection) signed off 39 of the species that were COSEWIC-listed. The signed-off list at that time did not include two red listed plant communities that are part of the coastal Douglas fir ecosystem.

.../2

Ministry of Environment Ecosystems Branch

Mailing Address:  
PO Box 9338 Stn Prov Govt  
Victoria BC V8W 9M1

Telephone: (250) 387-9731  
Facsimile: (250) 356-9145

Location:  
4th Floor  
2975 Jutland Rd  
Victoria BC V8T 5J9

Ministry of Environment (MOE) staff are presently preparing a briefing for the Minister of Environment on species at risk. This briefing will include the additional species from the original list of 85 species, and how the IWMS can be used as a tool for addressing the coastal Douglas fir ecosystem.

FPB Recommendation #5:

*The Board reiterates and supports the November 17, 2003 recommendation from the Coast IAMC to MOE that government review and consider increasing the one percent timber supply cap on the IWMS.*

The question of reviewing the allocation of the 1% timber supply budget for species at risk in IWMS has been discussed by both the Joint Management Committee and the Joint Steering Committee. It is recognized by the resource ministries on these committees that the 1% budget is presently of concern in some areas of the province, and that additional habitat may be required to maintain species at risk.

However, increasing the IWMS budget for impact on the timber harvesting land base is not in itself a solution to conservation of the coastal Douglas fir plant community, as so little of this ecosystem occurs on Crown forest land. Crown land makes up only 7.4% of the total area of the coastal Douglas fir ecosystem.

The Coastal IAMC has formed a Coastal Douglas Fir Working Group, consisting of qualified staff from the Ministry of Forests and Range (MOFR), MOE, the Integrated Land Management Bureau (ILMB) and the Conservation Data Centre (CDC). The Working Group is working to develop options and potential approaches to address the issues of critical wildlife habitat for the coastal Douglas fir ecosystem found on Crown land, private managed forest land and other lands within the CDFmm subzone.

Meaningfully addressing conservation of rare and endangered plant communities across the landscape would ultimately require the cooperation and assistance of all levels of government, non-governmental organizations (e.g., The Land Conservancy of BC, Islands Trust and the Habitat Acquisitions Trust), and private land owners.

Thank you for your ongoing interest in species and ecosystems at risk.

Sincerely,



Rod Davis, Director  
Ecosystems Branch

pc: Jack Dryburgh, R.P.F., District Manager, South Island Forest District  
Scott Benton, Director, Regional Operations, Environmental Stewardship Division  
Dick Heath, Regional Manager, Regional Operations, Nanaimo  
Stewart Guy, Manager, Ecosystem Branch, Victoria  
Heather MacKnight, Chair, Coastal Interagency Management Committee



File: 97250-20\040555

December 2, 2005

VIA FAX to 250 356-9145

Rod Davis  
Director, Ecosystems Branch  
Ministry of Environment  
PO Box 9338 Stn Prov Govt  
Victoria BC V8W 9M1

Dear Rod Davis:

**Re: MOE response to Board recommendations – Complaint Investigation 040555**

Thank you for your October 27, 2005 letter responding to two recommendations made in the Board report *Logging and Conservation of Endangered Plant Communities on Vancouver Island*.

In recommendation 4 the Board recommended that the Minister of Environment put a high priority on designating those red-listed plant communities in the CDF that may be affected by forest management as species-at-risk and establishing wildlife habitat areas. In your response you state that MOE staff are preparing a briefing note for the Minister to re-list two CDF plant communities that had been taken off of the species-at-risk list.

I accept your response but I do not agree that addressing only two plant communities is adequate. While it is important to re-list the two plant communities you do not mention the additional plant communities identified by the Conservation Data Centre that are red-listed and may be affected by forest management in the CDF. It is important to list these as well so that wildlife habitat areas can be designated.

Rod Davis  
December 2, 2005  
Page 2

In recommendation 5 the Board reiterated a recommendation that government review and consider increasing the one percent timber supply cap for the Identified Wildlife Management Strategy (IWMS). In your response you state that the issue has been discussed but specifically for the CDF it is not seen as a solution because of the small amount of crown land.

I accept your response but I do not agree with the argument that it would not be worthwhile to reconsider the one percent cap for the CDF area. While the small amount of crown land constrains what can be done under the IWMS, any additional wildlife habitat areas that can be established may be significant for an individual plant community. Therefore, the Board continues to believe that it is worthwhile to consider removing or increasing the cap for this area.

Thank you again for your reply.

Yours sincerely,



Bruce Fraser, PhD  
Chair

cc: Syd Haskell, Carmanah Forestry Society



October 28, 2005

File: 97250-20/040555

Bruce Fraser, Chair  
Forest Practices Board  
PO Box 9905, Stn Prov Gov't  
Victoria BC V8W 9R1

Dear Mr. Fraser:

Re: Reponse to Recommendation #1 from Forest Practices Board Report  
"Logging and Conservation of Endangered Plant Communities on  
Vancouver Island - Complaint Investigation 040555"

FOREST PRACTICES BOARD	
NOV 02 '05	
RECEIVED by:	
Original	BF
File #	040555
ACTION:	COPIES:
R1	FP BrD
<input type="checkbox"/> NIA Int:	<input type="checkbox"/> FYI Int:



I have reviewed the report and am responding on behalf of the Vancouver Island Region of the Ministry of Environment (MOE) to the first recommendation made by the Board to the MOE region and the South Island Forest District of the Ministry of Forests and Range (MOFR).

The recommendation states: *"Because of the high risk of extirpation, knowing the conservation significance of a site is critical. Staff from the South Island Forest District and MOE regional staff should work together to develop a conservation protocol for assessing areas for red-listed plant communities within the CDF in RMZ 34 before any further harvest plans are approved on the east coast of Vancouver Island."*

Discussion between the two agencies has resulted in agreement that MOE regional and Conservation Data Centre (CDC) staff would develop a conservation assessment protocol and supporting tool for red-listed plant communities. SFID staff will work with MOE to evaluate the protocol and provide feedback on its utility as an operational tool. It is our intention to provide this product to forest practitioners to assist them in identifying and characterizing these plant communities, thus enhancing their management.

Yours truly,

R. H. Heath, R.P.Bio., R.P.F.  
Regional Environmental Stewardship Manager  
Vancouver Island Region

pc: Jack Dryburgh, R.P.F., District Manager, South Island Forest District  
Scott Benton, Director, Regional Operations, Environmental Stewardship Division  
Stewart Guy, Manager, Ecosystem Branch, Victoria  
Heather MacKnight, Chair, Coastal Interagency Management Committee



File: 97250-20\040555

December 2, 2005

VIA FAX to 250 751-3208

Dick Heath  
Regional Environmental Stewardship Manager  
Ministry of Environment  
2080A Labieux Road  
Nanaimo, BC V9T 6J9

Dear Dick Heath:

**Re: Response to Board recommendation – Complaint Investigation 040555**

Thank you for your October 28, 2005 letter responding to the Board's #1 recommendation made in the Board report *Logging and Conservation of Endangered Plant Communities on Vancouver Island*. I accept that your response addresses the Board's recommendation to develop a protocol for assessing areas for red-listed plant communities.

Yours sincerely,

A handwritten signature in cursive script that reads "Bruce Fraser".

Bruce Fraser, PhD  
Chair

cc: Syd Haskell, Carmanah Forestry Society