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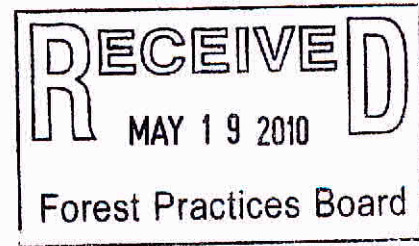
The Best Place on Earth

File: 280-30/FPBOARD  
Ref. 124028

MAY 13 2010

Al Gorley, RPF  
Chair, Forest Practices Board  
P.O. Box 9905, Stn Prov Govt  
Victoria, British Columbia  
V8W 9R1

FOREST PRACTICES BOARD	
MAY 19 2010	
RECEIVED by:	
Original	
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ACTION:	COPIES: Fred
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Dear Al Gorley:

On behalf of the ministries of Forests and Range (MFR), Environment (MOE), and Agriculture and Lands (MAL), please accept this letter as Government's response to the Forest Practices Board's recommendations in its special investigation report, *Biodiversity Conservation during Salvage Logging in the Central Interior of BC (October 2009)*.

Before responding, we would like to thank the Board for its evaluation of implementation of the Chief Forester's 'Guidance on Landscape- and Stand-level Structural Retention in Large-Scale Mountain Pine Beetle Salvage Operations (December 2005).' We are encouraged to learn that the retention guidance is being achieved at the stand-level, and appreciate the Board's analysis and recommendations to strengthen retention planning at the landscape level.



**Recommendation 1**

*Government should seize the opportunity that exists to implement a landscape-level conservation uplift by proceeding without delay to:*

- a) *Clarify government's objectives for wildlife and biodiversity at the landscape-level in areas affected by large-scale salvage operations.*
- b) *Provide leadership in the process of making landscape-level decisions about what areas to retain during salvage harvesting.*
- c) *Evaluate the achievement of government's objectives for wildlife and biodiversity at the landscape-level, throughout the area of the salvage operations, before opportunities are lost to influence the decisions made as a result of recommendation 1b.*

## Government response

### *Context*

Based on its investigation of harvest and retention planning in the Lakes, Prince George and Quesnel TSAs (the study area), the Forest Practices Board concluded that the Chief Forester's 2005 retention guidance was not implemented at the landscape level. In our view, there are several important factors that have contributed to the Board's observations:

- The study area was 'ground zero' for the current MPB infestation, and these TSAs contain some of the highest percentages of pine of any TSAs in British Columbia; consequently, there was no precedent on which to base timber harvest and retention strategies;
- To fulfil Government's objective to capture the maximum value from the infested pine, many short-term salvage tenures (i.e., non-replaceable forest licences) have been issued in the study area; this has substantially increased the number of licensees and concentration of licences within heavily impacted areas of the TSAs, and has necessitated fast and efficient planning; and
- The MPB infestation has substantially changed the forest landscape in the study area; for example, the size and magnitude of the infestation and consequent AAC uplifts in these TSAs have been more significant than what was anticipated in 2005 (when the Chief Forester's guidance was developed), making it more challenging to achieve landscape-level retention objectives across the study area.

The saw log salvage effort in some parts of central and northern British Columbia is nearing completion, but salvage efforts will continue for many more years in the study area. Approaches to forest management in large-scale salvage areas are evolving rapidly, as lessons learned from the study area are leading to more effective management approaches being implemented in other emerging large-scale MPB salvage areas.

With this context in mind, Government has had discussions with the Council of Forest Industries (COFI) over the past two months to determine what actions would be desirable, feasible and cost-effective to address the intent of the Board's recommendation while also ensuring the outcomes provide maximum utility and benefit to Government and large-scale MPB salvage licensees and professionals.

To achieve maximum utility and benefit, the scope of our action plan (below) is broader than the Board's investigation; for example:

- We will consider a broad cross-section of TSAs that have large-scale MPB salvage operations, not just the three TSAs within the Board's study area;
- We will review retention initiatives and areas within and outside functional openings that contribute to the achievement of FRPA biodiversity and wildlife objectives, not just in-block retention as analyzed by the Board; and
- We will consider how harvest and retention decision-making in large-scale MPB salvage areas addresses the overall requirements of FRPA (which necessitates considering and balancing all resource objectives on the land base), not just consistency with the Chief Forester's retention guidance as examined by the Board.



### ***Action plan***

Government and the COFI (in consultation with the Association of BC Forest Professionals) have agreed to establish a small Government-industry team to undertake the following actions over the next six months:

1. Review retention initiatives in large-scale MPB salvage areas, and assess whether they provide sufficient direction and guidance to forest professionals and licensees to facilitate compliance with FRPA and consistency with the Chief Forester's retention guidance;
2. Identify 'lessons learned from MPB salvage in the study area' that will help inform more effective harvest and retention planning across all large-scale MPB salvage areas; and
3. Based on the outcomes of 1 and 2, evaluate the effectiveness of the Chief Forester's guidance for all large-scale MPB salvage areas, and recommend clarification, updating and communication of the guidance as needed.

The team responsible for implementing this action plan will be chaired by Ian Miller of Forest Practices and Investments Branch, MFR. The team will report to the Chief Forester on outcomes of the action plan by September 30, 2010. With the team's recommendations in hand, the Chief Forester will consult with his other agency counterparts, and respond to the Board on Government's plans to address this matter by November 30, 2010.

Based on the outcomes of the above-noted action plan, the Chief Forester will also consult with the team and his other agency counterparts to determine whether and to what extent incremental Government actions are desirable and feasible to facilitate landscape-level harvest and retention planning across large-scale MPB salvage areas. The Chief Forester will advise the Board of Government's plans in this regard by November 30, 2010.

### **Recommendation 2**

*The Ministry of Forests and Range should:*

- a) *Use all available information to produce a disturbance/depletion map that shows all forest harvesting that has occurred, provides some estimate of the date of the harvest and indicates the source of the information. That map should be updated annually.*
- b) *Take steps necessary to make available maps showing forest cover and forest harvesting on tree farm licences of sufficient detail for strategic level analysis.*
- c) *Implement quality control procedures to ensure complete and accurate reporting of wildlife tree retention areas under Section 86(3)(a)(iv) of the Forest Planning and Practices Regulation.*
- d) *Make explicit the reserve status of all mature forest areas previously reported as being in harvested blocks.*
- e) *Complete the mapping of existing wildlife tree retention areas in harvested blocks where responsibility has reverted to the Crown.*

## **MFR Response**

### ***2a) Disturbance/depletion maps***

As part of the timber supply review process, Forest Analysis and Inventory Branch (FAIB) routinely generates depletion maps for TSAs. The depletion information comes from two sources: (1) year over year satellite imagery change detection (a new cutblock is a significant change in the spectral signature); and (2) RESULTS data, and includes the date of harvest. The two data sources are combined on an as needed basis, as required by timber supply reviews and the needs of other special projects.

FAIB will continue to generate depletion maps for timber supply areas on an as needed basis, and encourages those who require this information for special projects, such as strategic analyses or effectiveness evaluations, to contact the branch well prior to needing the depletion information and they will endeavour to deliver the map in a mutually beneficial manner and timeframe.

For the Board's information, 92,000 openings in RESULTS with outstanding silviculture liabilities will undergo forest cover updates as they are regenerated or reach free growing over the next five years; this will significantly improve the MFR's coverage of wildlife tree retention in RESULTS.

### ***2b) Forest cover/harvesting maps***

The MFR is currently pursuing the acquisition of tree farm licence (TFL) inventory data through collaborative agreements with licensees. Under these agreements, the MFR has access to the data for strategic analyses and the licensees benefit from the MFR posting the data to the LRDW with RESULTS data updates. Where the MFR has data for TFLs, and the agreement of licensees to share the data, it will make the forest cover and depletion map available in the same manner as it would for TSAs, as described in response to Recommendation 2a.

### ***2c) Quality control procedures***

As part of its continual improvement process, the MFR has already made significant progress in addressing the need for quality control in retention reporting in RESULTS. For example, the MFR has completed a 'retention guide' (Procedures for Submitting Forest Cover Retention Data to RESULTS (Interim Edition 1.2)) to assist licensees in accurately reporting retention in RESULTS, and a training module for retention reporting was delivered in November and December 2009. These actions, as well as the retirement of obsolete reserve type codes and the clean-up of some old data, are helping ensure accurate, effective retention mapping and tracking as we move forward.

These actions will enable the MFR to continually improve and refine its retention reporting requirements, procedures, guidance, training and communications to RESULTS users.



**2d & e) Legacy mapping**

The MFR has given due consideration to these recommendations; however, it has determined that cleaning up legacy data issues in RESULTS would be extremely costly to Government, and much of the data would be challenging if not impossible to retrieve. Furthermore, the MFR cannot assume that all retained mature forest within cutblocks was intended to meet reserve objectives; for example, some areas could have been left for a second pass harvest. Therefore, these recommendations are not practical or cost-effective to implement.


As indicated in response to Recommendation 2c, the MFR's primary focus will be to ensure retention reporting is accurate and effective moving forward.


If the Board has any questions regarding Government's actions to address the Board's recommendations, please contact Ian Miller directly at [Ian.C.Miller@gov.bc.ca](mailto:Ian.C.Miller@gov.bc.ca), or 250-387-8398.

In closing, we thank the Forest Practices Board for its recommendations to Government, and advise the Board that it will receive a further response from the Chief Forester on Government's plans to address Recommendation 1 by November 30, 2010.

Yours truly,

  
Dana Hayden  
Deputy Minister  
Ministry of Forests & Range

*for*   
Doug Konkin  
Deputy Minister  
Ministry of Environment

  
Larry Pedersen  
Deputy Minister  
Ministry of Agriculture & Lands

- pc: Steve Carr, CEO, Integrated Land Management Bureau
- Ralph Archibald, ADM Environmental Stewardship, MOE
- Gary Townsend, ADM, Regional Operations, MAL
- Dave Peterson, ADM, Field Operations, MFR
- Jim Sutherland, Director, Forest Practices & Investments Branch, MFR
- Albert Nussbaum, A/Director, Forest Analysis and Inventory Branch, MFR
- Kaaren Lewis, Director, Ecosystems Branch, MOE
- Dave Tudhope, A/Manager, Land Use Planning Policy, Strategic Land Policy Branch, MAL
- Bruce Sieffert, Director, Strategic Support and Marine Planning, ILMB
- Ian Miller, Forest Practices and Investments Branch, MFR
- Bill Warner, Regional Executive Director, Northern Interior Forest Region
- Madeline Maley, A/Regional Executive Director, Southern Interior Forest Region
- Doug Routledge, Council of Forest Industries
- Archie MacDonald, Council of Forest Industries
- Sharon Glover, President, Association of BC Forest Professionals



# Forest Practices Board

File: 97325-20/2007-01

June 14, 2010

Dana Hayden  
Deputy Minister  
Ministry of Forests and Range  
Legislative Buildings  
Victoria, BC V8W 9E2

Doug Konkin  
Deputy Minister  
Ministry of Environment  
Legislative Buildings  
Victoria, BC V8W 9E2

Wes Shoemaker  
Deputy Minister  
Ministry of Agriculture and Lands  
Legislative Buildings  
Victoria, BC V8W 9E2

Dear Dana, Doug and Wes:

We have received your letter of May 13, 2010, in which you provide a preliminary response to recommendations in the Board's special investigation report SR35, *Biodiversity Conservation during Salvage Logging in the Central Interior of BC (October 2009)*. We acknowledge government's action plan and look forward to substantive progress when the chief forester reports out later this year. We are also pleased to note that what is learned will be broadly applied.

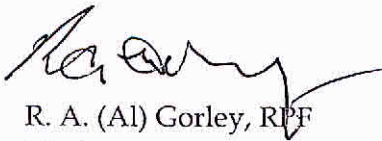
In regard to the context described in your letter, I can assure you that throughout our investigation the Board has been fully cognizant of the general circumstances surrounding salvage operations in the timber supply areas we examined, and over the wider area of the epidemic.

The Board remains very concerned about the lack of planning for retention at the landscape level. To be clear, we see a significant risk that the opportunity to adequately conserve biodiversity will be lost on some landscapes if a coordinated approach is not taken quickly. We understand that this will require a cooperative effort between government agencies and licensees, and strongly urge you to place a high priority on getting it done soon.

As you have pointed out, the need to address issues identified by the Board's report extends well beyond the three management units we examined, and for some time into the future. We believe this underscores the need to make considerable improvements to mapping that will enable government, industry, and professionals to make the necessary landscape level analyses and decisions. We recognize the challenges, but note the importance of adequate information to good forest management and public confidence.

Upon receipt of the chief forester's reports by November 30, 2010, the Board will determine an appropriate timeframe for follow-up. In the meantime, if our staff can provide further clarification or advice to the teams assigned to address this important issue, we would be pleased accommodate.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. A. Gorley", with a long, sweeping horizontal stroke extending to the right.

R. A. (Al) Gorley, RPF  
Chair



BRITISH  
COLUMBIA

The Best Place on Earth

File: 280-30

Ref: 127966

APR - 4 2011

Al Gorley, RPF  
Chair, Forest Practices Board  
PO Box 9905 Stn Prov Govt  
Victoria, British Columbia  
V8W 9R1

Dear Mr. Gorley:

On behalf of the Ministry of Forests, Lands and Natural Resource Operations (FLNRO), please accept this letter as government's follow-up response to the Forest Practices Board's Recommendation 1 in its special investigation report, *Biodiversity Conservation during Salvage Logging in the Central Interior of BC (October 2009)*.



### **Recommendation 1**

*Government should seize the opportunity that exists to implement a landscape-level conservation uplift by proceeding without delay to:*

- a) Clarify government's objectives for wildlife and biodiversity at the landscape-level in areas affected by large-scale salvage operations.*
- b) Provide leadership in the process of making landscape-level decisions about what areas to retain during salvage harvesting.*
- c) Evaluate the achievement of government's objectives for wildlife and biodiversity at the landscape-level, throughout the area of the salvage operations, before opportunities are lost to influence the decisions made as a result of recommendation 1b.*

### **Government response**

As the Forest Practices Board is aware, in spring 2010, the Ministry and the Council of Forest Industries (COFI) established a Government-industry team (co-chaired by Ian Miller, Manager, Forest Practices and Innovation Branch, and Archie MacDonald, COFI) to undertake a review of the status of landscape-level harvest and

Page 1 of 5

Ministry of Forests, Lands  
and Natural Resource  
Operations

Office of the Deputy Minister

Location:  
980 Blanshard Street  
Victoria, British Columbia  
V8W 3C8  
CANADA

Mailing Address:  
PO Box 9352 Stn Prov Govt  
Victoria, BC V8W 9M1

Tel: (250) 356-5012  
Fax: (250) 387-3291



retention planning across mountain pine beetle (MPB)-impacted management units, and to determine what, if any, actions are needed to clarify government's retention objectives and facilitate landscape-level retention planning.

Over fall 2010, the review team conducted 20 interviews with 45 representatives of major licensees, B.C. Timber Sales (BCTS), and forest districts in the Morice, Lakes, Prince George, Quesnel, 100 Mile House, Kamloops, Merritt, Okanagan, Cranbrook, and Invermere timber supply areas (TSAs), as well as Tree Farm Licence (TFL) 49 in the Okanagan. The review team did not interview salvage tenure holders, nor did it validate the anecdotal feedback of interviewees. The review also did not include an evaluation of the achievement of government's retention objectives.

The review outcomes verified the Board's overall conclusion that the Chief Forester's recommendations for enhanced retention are being achieved at the stand (cutblock) level but that, in most areas, licensees are not engaged in collaborative landscape-level harvest and retention planning. Typically, retention at the landscape level is not actively planned or designed – it is a by-product of progressive stand-level harvest planning in addition to any formally-established landscape level retention (e.g., old growth management areas [OGMAs]).

The review identified several positive outcomes with respect to landscape-level retention planning. For example, in the Lakes TSA, sustainable resource management plans (SRMPs) for the TSA integrate the Chief Forester's retention guidance and establish enhanced retention across the TSA through OGMAs, landscape connectivity, patch size distribution, and enhanced stand level retention. As well, about one third of the licensees interviewed indicated they plan retention areas at the landscape level within their operating areas, which enables watershed-level retention planning to address hydrologic recovery and other non-timber objectives. In particular, Tolko (Okanagan TSA) indicated it has had formal retention plans in place for high-infestation areas since 2006, and the Okanagan Shuswap District indicated that all other major licensees and BCTS in the Okanagan TSA also have retention plans in place.

The review also highlighted opportunities to improve landscape-level harvest and retention planning, especially retention mapping standards and processes for allocating and managing salvage tenures.

Based on these review outcomes, the review team made several recommendations to the Chief Forester to facilitate and support landscape-level harvest and retention planning in large-scale MPB salvage areas. The Chief Forester and other ministry executives and staff discussed the review outcomes and recommendations with a view to determining which actions government could take that would be appropriate, practical and feasible. Based on those discussions, the following actions were agreed upon:

1. **Salvage tenures** – The Ministry will encourage district offices that intend to issue new non-replaceable salvage licences over the coming years to use a structured salvage allocation process that is developed in collaboration with licensees that operate in the district. The process should:

- require that salvage licence agreements specify clear criteria for salvage operations (e.g., location, amount, size and characteristics of stands harvested); and,
- advocate referrals of harvest proposals between all licensees that operate within the same operating area and have a dispute resolution process if proposals overlap retention areas.

District offices will be encouraged to learn more about the salvage allocation process used in the Okanagan Shuswap District and to utilize aspects of that process that may be practical and feasible in other districts.

2. **Provincial guidance** – The Ministry will update the Chief Forester’s retention guidance to better assist licensees and professionals in implementing landscape and stand-level retention objectives. The update will:

- Add specific guidance and examples to illustrate how to measure aggregate patches;
- Clarify how stand and landscape-level retention planning fits together, and reflect this in revisions to Table 1 of the guidance document;
- Incorporate any useful research conducted since 2005, on the implications of large-scale salvage operations to environmental values;
- Add clear expectations for how to apply the guidance in hydrologically-sensitive watersheds;
- Provide an update on the current status of the land base in large-scale MPB salvage areas; and,
- Advocate development of district-level retention guidance where it currently does not exist, to better assist licensees and professionals in determining how and where to locate retention areas.

Updates to the Chief Forester’s retention guidance will need to be consistent with the outcomes of a recently-initiated government-led project that is exploring opportunities to mitigate significant mid-term timber supply shortfalls in TSAs hard hit by the MPB through relaxation or deferral of non-timber objectives that call for some stand retention. This project is expected to be completed by September 2011.

3. **Provincial information systems** – The Ministry will:

- Establish and promote a structured process and rules for delineating and mapping short and long term retention areas (for non-timber and timber objectives) that applies consistently across TSAs, reduces the risk of harvesting of retention areas by other licensees and enables accurate monitoring and tracking of retention at the TSA level and provincially (in RESULTS).
- In collaboration with the Forest Practices Board, continue efforts to enhance landscape-level data reporting capabilities under HectaresBC so this program may be used by licensee and government professionals, as well as the Forest and Range Evaluation Program (FREP), to monitor and assess landscape-level biodiversity retention in MPB-impacted TSAs.



Al Gorley, RPF  
Chair, Forest Practices Board

4. ***Landscape-level planning*** – No new MPB-specific landscape-level planning initiatives are contemplated at this time. However, the Ministry, in consultation with industries and professional organizations, will continue to develop and explore delivery options for a sustainable forest management planning framework that would integrate all aspects of landscape-level operational planning and be implemented within each TSA or management unit.

In addition to these efforts, the Ministry will continue to develop new initiatives designed to integrate the management of multiple resource tenures on the land base. Integrated management of tenures will promote a landscape-level perspective, provide more certainty about the land base available for development and retention, and help address conflicts that arise between tenure holders.

We are confident government's efforts to better understand and improve landscape-level harvest and retention planning across large-scale MPB areas adequately addresses the Board's recommendation.

If the Board has any questions or would like further information, please contact Ian Miller, Manager, Sustainable Forest Management Section, Forest Practices and Investments Branch, FLNRO, at 250-387-8398.

Yours truly,

A handwritten signature in black ink, appearing to read 'D. Konkin', with a long horizontal flourish extending to the right.

Doug Konkin  
Deputy Minister

pc: Jim Snetsinger, Chief Forester, FLNRO  
Dave Peterson, ADM, South, FLNRO  
Kevin Kriese, ADM, North Central/West Area, FLNRO  
Gary Townsend, ADM, Provincial Operations, Integrated Resources, FLNRO  
Mike Falkiner, Executive Director, B.C. Timber Sales, FLNRO  
Kevin Dickenson, Regional Executive Director, Thompson-Okanagan Region, FLNRO  
Gerry MacDougall, Regional Executive Director, Cariboo Region, FLNRO  
Eamon O'Donoghue, Regional Executive Director, Skeena Region, FLNRO  
Bill Warner, Regional Executive Director, Omineca Region, FLNRO  
Tony Wideski, Regional Executive Director, Kootenay-Boundary Region, FLNRO  
Tom Ethier, Director, Fish, Wildlife and Habitat Management Branch (FHHMB),  
FLNRO  
Dave Hails, District Manager, Okanagan Shuswap District, FLNRO  
Kaaren Lewis, Director, Ecosystems Protection and Sustainability Branch (EPSB), MoE  
Dan Peterson, Director, Resource Management, Thompson-Okanagan Region, FLNRO  
Jim Sutherland, Director, Forest Practices and Investments Branch (FPIB), FLNRO  
Stewart Guy, Manager, Major Projects, Competitiveness and Transformation, FLNRO  
Wayne Martin, Major Projects Manager, Omineca Region, FLNRO  
Ian Miller, Manager, Sustainable Forest Management, FPIB, FLNRO  
Chris Ritchie, Manager, Fish and Wildlife Recovery, FHHMB, FLNRO  
Rhonda Cage, Land Resource Specialist, Regional Operations, Omineca Region,  
FLNRO  
Shannon Carson, Land Resource Team Leader, First Nations and Land Use Branch,  
FLNRO  
Laura Darling, Forest Ecology & Habitat Specialist, FPIB, FLNRO  
Nancy Densmore, Biodiversity Specialist, FPIB, FLNRO  
Doug Lewis, Major Projects Coordinator, Competitiveness and Transformation,  
FLNRO  
Todd Manning, Senior Land Use Planning Biologist, EPSB, MoE  
Shirley Turcotte, Forest Practices Projects Coordinator, FPIB, FLNRO  
Kristine Weese, Sustainable Forest Management Specialist, FPIB, FLNRO  
Sharon Glover, President, Association of BC Forest Professionals (ABCFP)  
Mike Larock, Director of Professional Practice and Forest Stewardship, ABCFP  
Archie MacDonald, General Manager, Forestry, COFI  
Jim McCormack, Planning Coordinator, South West, Can-For Forest Management Group  
Kerry Rouck, Project Forester, Gorman Brothers Lumber Ltd.  
Doug Routledge, Vice-President, Forestry and Northern Operations, COFI





File: 97350-20/2007-01

April 11, 2011

Doug Konkin  
Deputy Minister  
Ministry of Forest, Lands and Natural Resource Operations  
Legislative Buildings  
Victoria BC V8W 9E2

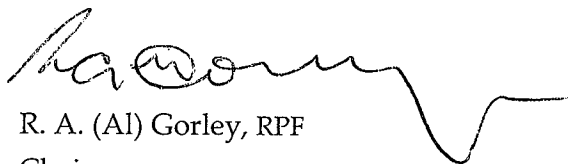
Dear Doug Konkin:

Thank you for your letter of April 4, 2011, providing the Board with the government's follow-up response to the Board's special report SR35, *Biodiversity Conservation during Salvage Logging in the Central Interior of BC*; and specifically to recommendation 1 to "seize the opportunity that exists to implement a landscape-level conservation uplift" in areas affected by large-scale salvaging of mountain pine beetle affected timber.

The Board appreciates the significant efforts of the government-industry led team that verified, and expanded on, the conclusions in the Board's report. We have reviewed the actions that were agreed to as a result of that effort and we share government's optimism that those actions will improve landscape-level harvest and retention planning. We look forward to hearing about rapid progress on the accomplishment of those actions.

The Board notes that we appreciate the opportunity to collaborate with the Forest and Range Evaluation Program in reporting on the level of achievement of landscape-level biodiversity objectives.

Yours truly,



R. A. (Al) Gorley, RPF  
Chair



INTERNATIONAL YEAR  
OF FORESTRY 2011