



Reference: 240195

June 26, 2018

Dave Clarke, Executive Director
Forest Practices Board
PO Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 9R1



July 2/18

Dear Mr. Clarke:

On behalf of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) and the Chinook Business Area of BC Timber Sales (BCTS) please accept this letter as government's response to the Forest Practices Board's (the Board) three recommendations outlined in Report #FPB/IRC/212: Managing At-Risk Plant Communities near Mount Elphinstone Park (January 2018). The ministry appreciates the Board's evaluation and recommendations to address the protection of at-risk plant communities within the Chapman Landscape Unit.

FLNRORD and BCTS have been actively working to respond to a number of concerns raised about forest harvesting in general in the area, including complaints that led to the subject Board report. Responsibly managing rare plant communities and biodiversity within the context of active forest harvesting in the Chapman Landscape Unit is a key objective of both FLNRORD and BCTS. The following are the responses to the three recommendations of the Board's report:

1. Government should provide legal objectives or guidance for managing the amount and distribution of these plant communities in the Sunshine Coast Timber Supply Area (TSA).

At-risk plant communities in the Sunshine Coast TSA are managed according to a coarse filter ecosystem approach as described in the Biodiversity Guidebook. This approach manages a broad range of habitats by setting biodiversity objectives according to different Natural Disturbance Types under which ecosystems have evolved. The legal biodiversity objectives for the Chapman Landscape Unit provide ecosystem protection by establishing Old-growth Management Areas (OGMA) throughout the landscape unit and by applying stand level structural retention targets in wildlife tree patches (currently termed Wildlife Tree Retention Areas – WTRA) within and adjacent to cut blocks. The establishment of OGMAs considered

sensitive ecosystem information provided by the Conservation Data Center as a criterion for site selection. Similarly, guidance for WTRAs (Wildlife Tree Retention: Management Guidance document) recommends the site selection of WTRAs be anchored on ecologically valuable attributes that may include at-risk species.

FLNRORD recently completed an assessment of mature and old seral forest in the Chapman Landscape Unit which indicates that, overall, objectives for all mature Biogeoclimatic Ecosystem Classification units, as per the Biodiversity Guidebook, are currently being achieved. Based on the principles of the coarse filter ecosystem approach, at-risk plant communities that require mature and old forest should be adequately protected in the Chapman Landscape Unit.

Establishing legal objectives under the *Forest and Range Practices Act*, as recommended by the Board, would require adopting the fine filter approach of the Identified Wildlife Management Strategy (IWMS) to enable enhanced protection or specific additions to existing protective measures. To recommend an at-risk species or plant community for inclusion under IWMS, it must be documented how the coarse filter ecosystem approach is unable to provide adequate protection to sustain the population and/or plant community. At this time, there is insufficient evidence to suggest that the coarse filter ecosystem approach is inadequate for the at-risk plant communities identified in the Board's report.

FLNRORD will further assess the effectiveness of the coarse filter ecosystem approach to maintain biodiversity and at-risk species and plant communities. Where deficiencies exist, FLNRORD will explore management options to improve protection, which ultimately may lead to a recommendation for IWMS status. FLNRORD will also review existing objectives and guidance documents to make adjustments, where appropriate, to better reflect the importance of the coarse filter ecosystem approach (inclusive of site specific WTRA guidance) in protecting at-risk species and plant communities. In the future, the Province is developing legislation to protect all species at risk, which may afford more specific legal protection for at-risk plant communities and/or plant species within the context of both landscape-level and site-level scales.

2. Government should update the list of plant communities in the Identified Wildlife Management Strategy.

FLNRORD is currently working with the Ministry of Environment & Climate Change to review the procedures for updating the *Forest and Range Practices Act* (FRPA) list of species at risk. The Province is also developing legislation to protect species at risk, which may afford legal protection for at-risk plant communities and/or plant species in the future. It is expected that the list of species at risk that require special management under FRPA will necessarily reflect the species at risk identified under BC's developing species at risk legislation. The full procedures for updates to the Identified Wildlife Management Strategy lists are provided in Identified Wildlife Management Strategy: Procedures for Managing Identified Wildlife (Version 2004) (<http://www.env.gov.bc.ca/wld/documents/identified/IWMS%20Procedures.pdf>).

3. BCTS should revise its protocol to include consideration of younger occurrences of plant communities.

BCTS' established general protocols for managing ecological communities are consistent with the Provincial Wildlife Retention Area (WTRA) Guidance. Working in TSAs, BCTS is limited in its ability to address management of at-risk plant communities at the strategic landscape level. In the absence of a broader FLNRORD/Ministry of Environment & Climate Change strategy, BCTS focuses on retaining old-seral stands (i.e. >250 years), and where practicable, protecting and recruiting features considered most at-risk in ecosystems.

BCTS' established general protocols include the consideration of younger plant communities in addition to other important ecological features. Reserves are anchored on the most important ecological features, with consideration of the multiple social, economic, and ecological objectives we are managing.

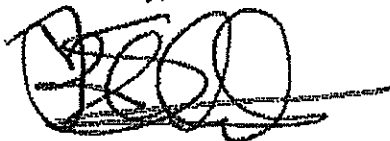
The BCTS Chinook Business Area-specific process for the management of at-risk plant communities focuses on 3 key elements:

- protecting old seral remnants where available and consistent with operational constraints including safety,
- identifying where operations overlap red-listed ecological communities using the associated BC Conservation Data Centre (CDC) reports and where the attributes are scarce, i.e., considered 'most at risk' for protection, and
- establishing retention areas using the 2006 Wildlife Tree Retention Area (WTRA) guidance document, subject to the requirement that retention not unduly reduce the supply of timber from British Columbia's forests. WTRAs are anchored on areas of highest biodiversity value, the identification of which includes consideration of rare plant communities.

BCTS manages its program in the context of continuous improvement. As new information or direction is provided by government, BCTS will adapt its program to meet higher level government objectives including training staff and multiphase contractors to ensure they are aware of and address new information or direction.

I would like to thank the Forest Practices Board for its report and recommendations to FLNRORD. If the board has any questions regarding FLNRORD's response please contact Allan Johnsrude, Regional Executive Director, South Coast Resource Region by phone at 604-586-2892.

Yours truly,

A handwritten signature in black ink, appearing to read 'T. R. Sheldan', with a horizontal line extending to the right.

T. R. (Tim) Sheldan
Deputy Minister



File: 97250-20/16057

August 15, 2018

Via email: Allan.Johnsrude@gov.bc.ca

Allan Johnsrude
Regional Executive Director, South Coast
Ministry of Forests, Lands, Natural Resource
Operations and Rural Development
46360 Airport Road
Chilliwack, BC V2P 1A5

Dear Allan Johnsrude:

Re: Response to the recommendations in Complaint Investigation 16057
Managing At-Risk Plant Communities near Mount Elphinstone Park

The Forest Practices Board has received a letter from deputy minister, Tim Sheldan, dated June 26, 2018, providing the ministry's response to the Board's recommendations in the above complaint investigation report. His letter (attached) indicates that if the Board has any questions we should contact you. The purpose of this letter is to ask some follow-up questions to ensure the Board understands the actions taken to date, and those proposed to be taken in the future, so that the Board can fulfill its duty under s.134 of FRPA to assess the adequacy and appropriateness of the actions taken.

The Board appreciates that the ministry has recently completed an assessment of mature and old seral forest in the Chapman Landscape Unit, which indicates that the objectives for all mature Biogeoclimatic Ecosystem Classification units are currently being achieved according to the Biodiversity Guidebook. The response also indicates that the ministry believes that "at-risk plant communities that require mature and old forest should be adequately protected in the Chapman Landscape Unit."

The Board would appreciate receiving a copy of the assessment undertaken by the ministry and clarification on whether the ministry has determined that the specific at-risk plant communities discussed in our report are, in fact, adequately protected in the Chapman Landscape Unit, as opposed to "should be adequately protected." We would appreciate understanding the basis for this conclusion.

Allan Johnsrude

August 15, 2018

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The response letter also indicates that the ministry intends to further assess the effectiveness of the coarse filter ecosystem approach, and “where deficiencies exist, will explore management options to improve protection, which ultimately may lead to a recommendation for IWMS status.” The Board appreciates this commitment to further assessment, and would like to know the ministry’s time frame for undertaking it.

Finally, the Board appreciates that these are complex matters that are sometimes better discussed by in-person meeting or conference call, and we would be pleased to arrange such a meeting, should you wish.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sam Coggins', with a stylized, cursive script.

Sam Coggins, PhD RPF
Director, Investigations

cc: Norah White



October 11, 2018

File: 97250-20/16057

VIA EMAIL: Sam.Coggins@bcfpb.ca

Sam Coggins, Director, Investigations
PO Box 9905,
Stn Prov Gov't,
Victoria BC, Canada
V8W 9R1

Dear Sam Coggins:

RE: Response to the recommendations in Complaint Investigation 16057
Managing At-Risk Plant Communities near Mount Elphinstone Park

Thank you for your August 15, 2018, letter requesting clarification to the ministries earlier response of June 26, 2018. We also found the follow up meeting on September 26, 2018, to provide helpful discussion for this complex matter. The lack of clarity in a few aspects of our original response is acknowledged and we appreciate the opportunity to improve understanding.

Current management of rare plant communities has largely focused on a coarse filter approach as noted in our initial response. This has included consideration of this ecosystem value in the establishment of conservation or protected areas and primarily enhanced through the establishment of Old Growth Management Areas under the Chapman Landscape Unit Plan. While we currently consider this approach as the primary mechanism to enhance rare plant community conservation and assume appropriate balances have been considered in light of the available old and mature targets within a low biodiversity emphasis option landscape unit, there has not been an assessment to consider the scope of rare plant community distribution or potential refinements that may also complement other land management objectives.

The ministry will be undertaking 3 primary actions as a result of the FPB report. These include:

1. Further analysis of the plant communities including a comparison of Vegetation Resources Inventories, available Terrestrial Ecosystem Mapping and some field verification by qualified plant ecologists. This work is intended to offer additional insight as to how the coarse filter approach along with current forest management approaches are addressing risks to rare plant communities. This work is planned to start in the fall of 2018 to produce some preliminary results by the summer of 2019.

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2. Assessing the need to update the CDC based on the outcome of the above and any associated management expectations noting that for low biodiversity emphasis landscape units, a higher level of risk tolerance for old and mature forest attributes is an inherent part of balancing broader social, economic and environmental objectives. This will occur following the completion of #1.
3. Reviewing current Wildlife Tree Retention Area guidance to ensure forest professionals undertaking forest development planning recognize the importance of maintaining larger representative components of higher quality rare plant communities. This is an important consideration in site level forest planning and risk mitigation that augments the coarse filter approach in the absence of broader coarse filter monitoring assessments.

As discussed during our meeting, the ministry is continuously considering how best to strategically manage the broad spectrum of ecological values on the landscape. This requires that we consider, along with practical factors, a somewhat hierarchical approach to the prioritization of environmental values. Factors such as ecological representation and importance to ecosystem integrity (health) help us set these priorities. These factors have and will continue to affect how we manage for plant communities in the region in the face of limited resources.

Thank you again for your letter and the opportunity to meet and discuss these issues. If you have any further questions or comments regarding these next steps, please contact Scott Barrett, Director, Resource Management, South Coast Region, by email at scott.barrett@gov.bc.ca or by phone at 604-586-2889.

Sincerely,



Allan Johnsrude, RPF
Regional Executive Director
South Coast Region

pc: Scott Barrett, Director, Resource Management



File: 97250-20/16057

October 26, 2018

Allan Johnsrude
Regional Executive Director
Ministry of Forests, Lands,
Natural Resource Operations and Rural Development
46360 Airport Road
Chilliwack, BC V2P 1A5

Dear Allan:

Re: Response to the recommendations in Complaint Investigation 16057
Managing At-Risk Plant Communities near Mount Elphinstone Park

Thank you for your letter of October 11, 2018, clarifying your response to the Board's three recommendations. Our recommendations are trying to help government, and BCTS, develop appropriate objectives and guidance that will ensure identification and conservation of at-risk plant communities at the appropriate scale.

The Board is pleased to acknowledge government's commitment to:

- 1) Undertake further analysis and inventories to address risks to rare plant communities;
- 2) Assess the need to update the CDC database based on the outcome of the initiative above; and
- 3) Review the current Wildlife Tree Retention Area guidance to help maintain larger representative components of higher quality rare plant communities.

We appreciate the timelines government has identified and look forward to being informed of the preliminary results when they become available.

Thank you for your consideration of the recommendations made by the Board. We now consider this file closed.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Kriese".

Kevin Kriese
Chair

cc: John Allan, Deputy Minister
Diane Nicholls, Chief Forester