



Reference: 248814

June 3, 2019

VIA EMAIL: kevin.kriese@bcfpb.ca

Kevin Kriese, Chair
Forest Practices Board
PO Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Kevin Kriese:

On behalf of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD), I ask you to please accept this letter as the Government's response to the Forest Practices Board's two recommendations in its report: *Timber Salvage Harvesting and Fisher Management in the Nazko Area (October 2018)*.

As the Board is aware, Government is in the process of improving the *Forest and Range Practices Act (FRPA)*, and we thought it best to postpone our response until we received a clear mandate to proceed with proposing changes, many of which largely address the Board's recommendations.

Recommendation One

As previously recommended by the Board, government must take leadership on landscape level decisions. Given the type of large scale salvage that is continuing to occur in this area, government should ensure that harvesting and retention planning in such salvage scenarios is coordinated between multiple licensees with spatially-explicit legal direction for species at risk and monitoring to ensure that planning is implemented and effective.

Government Response

The ministry agrees with the Board's recommendation is currently working to develop landscape level planning options and to strengthen FRPA in a number of ways that could help in this regard.

For example, we are considering changes to FRPA that could enhance the ability of district managers to (a) require forest licensees to include strategies in their operational plans to better manage or conserve locally significant resource values; and, to (b) intervene during forest operations to prevent contraventions or adverse impacts to FRPA values, such as species at risk.

We are also exploring more transformative changes such as creating a new landscape level forest planning framework that could replace forest stewardship plans. Conceptually, this new planning framework would enable coordinated planning of timber harvesting, retention, and silviculture treatments within a specified landscape (such as a timber supply area), with a view to:

- address the area's unique ecological and social values;
- limit the cumulative effects of forest operations on those values;
- mitigate forest losses from natural disturbance events (such as wildfires, insect infestations, droughts, and floods); and,
- enable forward-thinking planning to reduce the future risks and uncertainty to forest values associated with climate change.

While these proposed changes are being further developed, the Board may be aware that the Minister introduced an initial set of changes to FRPA in April. These changes, which have recently been enacted through the [*Forest and Range Practices Amendment Act, 2019*](#) will better inform resource users such as trappers (as well as other community stakeholders and Indigenous Nations) about the location and timing of cutblocks and roads so that their interests, such as protecting important areas of fisher habitat, can be better considered. Bill 21 will now require that forest licensees share their proposed cutblocks and roads with the public for review and comment, and report on how they considered all feedback prior to submitting cutting and road permit applications. This alone will significantly enhance resource user awareness of proposed cutblocks and roads, as well as the transparent consideration of resource user feedback in the planning of forest operations prior to permit issuance.

In the near future, the ministry plans to reach out broadly to gain wide-ranging perspectives on the proposed changes to FRPA. We trust that the Board will prepare a comprehensive submission to this process and look forward to reviewing and considering the Board's feedback.

Recommendation Two

Government should use legal tools under sections 9, 10 and 11 of the Government Actions Regulation or Section 7 of the Forest Planning and Practices Regulation for species-at-risk to protect remaining important fisher habitats in the Nazko area and manage to restore the local population over time.

Government Response

As the Board is aware and has described in its report, at this time, the conservation of fisher habitat in the Cariboo region is largely guided by the biodiversity conservation strategy in the Cariboo Chilcotin Land Use Plan (CCLUP), other forest retention provisions of FRPA, fisher conservation guidance in the Integrated Wildlife Management Strategy, and forest planning and practice guidance and training for industry professionals. Although legal tools such as establishing wildlife habitat areas and general wildlife measures under the Government Actions Regulation (GAR) are important tools for conserving habitat for species at risk, Government is relying on the above-noted strategies to conserve fisher habitat in the Cariboo region at this time.

Despite this, Government has a number of complementary initiatives in place or planned to enhance the conservation of fisher habitat in the Cariboo region. These include:

- Plans to develop a provincial Fisher Management Plan to guide Government and industry professionals on managing suitable forest habitat for fishers across the timber harvesting land base (including during large-scale salvage operations);
- Continuing efforts to develop landscape planning tools such as fisher habitat models to support landscape-level habitat planning for fisher;
- Continuing and expanding the [Fisher Habitat Extension Program](#), which is a well established program that develops and communicates habitat management guidance to government, forest industry professionals, Indigenous Nations, and trappers;
- Continuing and expanding field trials designed to assess the effectiveness of fisher habitat management guidance in retaining suitable fisher habitat; and,
- Continuing a research project initiated in 2018 to gain a better understanding of the impacts of habitat disturbances (i.e., the cumulative effects of forest operations and wildfire) on fisher populations in the Chilcotin area.

I would like to acknowledge that salvage harvesting in the Cariboo region was necessary to bring the land base back into production following a large scale mountain pine beetle epidemic. Because salvage harvesting focused on stands with high mortality due to insects, disease and windthrow, the harvesting of these stands has helped mitigate wildfire intensity in these naturally disturbed areas and hopefully reduce the likelihood of further catastrophic events. Furthermore, the funds generated from salvage harvesting are being used to replant and restore these sites, which we hope will have a positive impact on fisher habitat in the future.

In closing, I would like to thank the Forest Practices Board again for its report and recommendations on conserving fisher habitat in the Nazko area. The ministry looks forward to engaging the Board on how to strengthen the planning and practices framework under FRPA to improve Government's ability to protect the habitat of wildlife important to trappers, other resource users, communities and Indigenous Nations.

Sincerely,



John Allan
Deputy Minister

pc: Diane Nicholls, Assistant Deputy Minister, Chief Forester
Tom Ethier, Assistant Deputy Minister, Resource Stewardship Division
David Muter, Executive Director, Species at Risk Recovery Branch
Mike Pedersen, Regional Executive Director, Cariboo Natural Resource Region
Julie MacDougall, Director, Resource Practices Branch
Josh Pressey, District Manager, Quesnel Natural Resource District



File: 97250-20/16037

August 16, 2019

John Allan
Deputy Minister
Ministry of Forests, Lands, Natural Resource Operations and Rural Development
PO Box 9352
Stn Prov Govt
Victoria BC V8W 9M1

Dear John Allan:

Re: Response to the recommendations in Complaint Investigation 16037
Timber Salvage Harvesting and Fisher Management in the Nazko Area

Thank you for your letter of June 3, 2019, providing your response to the Board's two recommendations. The Board accepts the Ministry's response to our first recommendation, that government leadership in landscape level planning with spatially explicit legal direction and monitoring for species at risk is required. The Board supports the strengthening of FRPA, and believes that landscape level planning has been a gap in the existing planning framework.

Unfortunately, legislative changes will take several years to implement and fisher habitat continues to be at risk in the interim. The Board continues to believe, as per our second recommendation, that interim steps to protect valuable fisher habitat are needed. We would like to better understand how the five actions identified by the Ministry will be implemented in the Quesnel area and how they will improve outcomes for Fisher. We will keep Recommendation Two open and we request an update on implementation of the five initiatives by July 31, 2020.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Kriese", followed by a horizontal line.

Kevin Kriese
Chair

cc: Diane Nicholls, Assistant Deputy Minister, Chief Forester
Tom Ethier, Assistant Deputy Minister, Resource Stewardship Division
David Muter, Executive Director, Species at Risk Recovery Branch
Mike Pedersen, Regional Executive Director, Cariboo Natural Resource Region
Julie MacDougall, Director, Resource Practices Branch
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