



Reference: 260902

Feb 1, 2021

VIA EMAIL: Kevin.Kriese@bcfpb.ca

Kevin Kriese, Chair
Forest Practices Board
310 – 1675 Douglas Street
Victoria, British Columbia V8W 2G5

RE: Reforestation in the Interior Douglas fir Subzone: Are reforestation Choices Meeting Objectives?

Dear Kevin Kriese:

I would like to thank the Forest Practices Board (FPB) for highlighting issues relating to silviculture objectives and reforestation in the Interior Douglas-fir dry-belt subzones (the “IDF”) in the report, “*Reforestation in the Interior Douglas fir Subzone: Are reforestation Choices Meeting Objectives?*”. The report is timely and aligns with the increased level of attention government has been placing on dry IDF in recent years. As identified in the report, timber harvesting focused on mountain pine beetle salvage is coming to an end and there is an increasing level of forestry activity in dry Douglas-fir stands. As a result of these pressures and the intricate nature of the dry-belt IDF, the ministry is modernizing silviculture objectives, best practices and outcomes, to improve the resilience of this ecosystem. Several initiatives aimed at improving forest conditions in the IDF are now underway.

Forest professionals have acknowledged that a multidisciplinary and collaborative approach is necessary for successful management of IDF values. Creating awareness and understanding of the management challenges for values in dry-belt IDF subzones began in 2016, when the ministry’s South Area held workshops for internal staff representing research, wildlife, water, range, forests, and climate disciplines. In March 2017, the Resource Practices Branch partnered with Regional Operations staff to deliver the “*IDF Stand Establishment and Best Management Practices Workshop*” in Williams Lake, attended by 130 government and non-government forest professionals. This information forum has facilitated improvements to management approaches and practices in the IDF.

The goal has been to work collaboratively across the range of the dry-belt IDF, recognizing that solutions will undoubtedly be unique to the local landscape and biogeoclimatic factors. Regional Operations staff have also been focusing on issues specific to geography:

- Drought versus frost as a leading limiting factor in silvicultural success;

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- Exploring opportunities to use selection harvest silviculture systems versus patch cuts;
- Variability in harvest operator experience and training needs;
- Data collection to support adaptation of practices and specific silviculture requirements that support priority values such as ungulate winter range, visual quality, wildfire risk reduction.

The ministry acknowledges much of the report's findings and recommendations. We accept the broad direction of the following two recommendations:

1. FLNR should promptly re-assess the long-term reforestation objectives for the dry IDF and update them based on the likely consequences of climate change.

2. FLNR should update reforestation standards to reflect the updated objectives combining a combination of legally required direction and best management practices so that the public can be confident that the objectives will be achieved.

Although reforestation objectives in the dry-belt IDF have traditionally focused on restoring timber values and maintaining range management opportunities, there are many values supported by dry-belt IDF forests that are steadily emerging as management priorities. We agree that the dry-belt IDF is under significant strain from increasing harvest levels, range use, water use, and recreation demands. Forest health conditions are exacerbated by extreme climate events and variability, drought severity and frequency, and wildfire risk. The cumulative pressures affect the health and resilience of these unique forest types. Reforestation objectives linked to the management of these pressures need to be incorporated into silviculture plans and activities. The ministry is heavily engaged in re-evaluating long-term objectives for dry-belt fir management through a climate-change resilience lens. There are currently several initiatives and activities underway that support the development of new management strategies, with some specific to the IDF zone:

- Government Action Regulation (GAR) orders such as the Ungulate Winter Range GAR which direct harvesting practices;
- Wildfire Risk Reduction and Community Wildfire Protection Plans are in various stages of development throughout urban interface areas, often characterized by the dry-belt IDF;
- Ecosystem restoration work being carried out in open forest and grassland interface areas;
- Exploration of modernized land use planning objectives or amending existing plans to inform future desired forest conditions;
- Using alternative silvicultural systems to build landscape resilience and buffer influences of a changing climate;
- The *Land Act* and the new FRPA are being used to investigate options to manage the dry-belt fir ecosystems and improve resilience;
- The anticipated Forest Landscape Planning framework under the new FRPA is being piloted in two districts where dry-belt IDF management is a focus.

The report states that initiatives are not being developed consistently between ministry jurisdictions. I can confirm that we are aware of these different approaches. However, it should be recognized that each region or district has its own unique circumstances pertaining

to indigenous relations, legal, societal, and ecological drivers. Granted, this makes it challenging to adopt consistent approaches that fit across multiple districts.

Regional Operations staff have worked collaboratively with licensees to update stocking standards and develop new enhanced basic standards for dry-belt IDF variants in many parts of southern British Columbia. Stocking standards development has been coordinated across regional boundaries to ensure consistency in approach. Modernized stocking standards are shifting to more resilient and ecologically suitable species. Examples of modernized stocking standards include the removal of lodgepole pine as a preferred species and promoting more resilient species like Interior's Douglas-fir. The shift to Douglas-fir will result in more careful consideration of silviculture systems and the subsequent regeneration strategies. These standards are now in place in Forest Stewardship Plans (FSPs) in southern BC.

The ministry acknowledges the current legal framework limitations for stocking standards and is currently reviewing opportunities to develop robust and practical legal direction. The modernization of FRPA is providing an opportunity to consider new approaches with silviculture regimes and stocking standards where existing standards are inadequate to meet ecological realities.

The recent introduction of the Climate Based Seed Transfer policy and the ongoing development of a Climate Change Informed Species Selection tool will help guide foresters to better informed decision making. The *IDF Stand Establishment and Best Management Practices (BMP) workshop*, Williams Lake 2017, resulted in a request to develop new Best Management Practices for plantation establishment. A report and BMP brochure for field use has been completed for the Thomson Okanagan district while a companion document for establishment in the dry-belt IDF portion of the Cariboo Region is nearing completion. Concurrently, best practices are being developed for managing forests for wildfire risk reduction, an important step to protect and develop resilience in these forests.

While we share the FPB's concerns regarding cutblock regeneration performance, it is our observation that many of the actions and initiatives undertaken are improving dry-belt IDF outcomes. We also agree that effectiveness monitoring will be an important tool to ensure success and are in the process of undertaking quantitative regeneration performance assessments of sites across the dry IDF subzones.

Once again, I wish to thank the Board for raising attention on this important matter of forest management, and for the time and resources it has invested in producing the report.

Sincerely,

A handwritten signature in blue ink, appearing to be 'DN', with a long horizontal flourish extending to the right.

Diane Nicholls, RPF
ADM, Chief Forester
Office of the Chief Forester

260902 Kevin Kriese, Chair, Forest Practices Board

pc: Paul Rasmussen, ADM Regional Operations South
Shane Berg, Deputy Chief Forester, OCF
Norah White, Manager, Sustainable Resource Management, RPB
Neil Hughes, Forest Establishment Leader, Harvesting & Silviculture, RPB



**Forest
Practices
Board**

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February 25, 2021

Diane Nicholls RPF
Chief Forester
Ministry of Forests, Lands, Natural Resource
Operations and Rural Development
PO Box 9352 Stn Prov Govt
Victoria, BC V8W 9M1

Dear Diane Nicholls:

Re: FLNRORD Response to the Board's Special Investigation Report
Reforestation in the Interior Douglas-fir Subzone:
Are Reforestation Choices Meeting Objectives?

Thank you for your February 1, 2021 response to the Board's recommendations made in its "Reforestation in the Interior Douglas-fir Subzone" special investigation.

The Board is encouraged that the ministry supports the recommendations and is working towards developing new management strategies to improve reforestation practices in dry-belt fir ecosystems. While the ministry's initiatives are appropriately focused, some are described in broad terms and it is not completely clear how they specifically apply to reforestation in the dry IDF.

Recognizing that full implementation of the recommendations will take time, the Board will continue to monitor the ministry's progress, and we look forward to the next update by September 30, 2021. To help the Board understand the reforestation objectives, standards, legal direction and guidance the ministry is developing, please describe in that update how the initiatives support management strategies specific to the dry IDF, and when implementation may be expected.

Yours sincerely,

Kevin Kriese
Chair