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VIA EMAIL: Keith.Atkinson@bcfpb.ca

Keith Atkinson, Chair
Forest Practices Board
PO Box 9905 Stn Prov Govt
Victoria British Columbia
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Dear Keith Atkinson:

Thank you for your recommendations in the Board's special investigation *Management of Habitat for Species at Risk under the Forest and Range Practices Act (FRPA)*, released in August 2023. The Resource Stewardship Division, within the Ministry of Water, Land and Resource Stewardship (WLRS), is the lead department responsible for policy and recovery of species at risk so is leading this response. Successful implementation of the recommendations will, however, rely on program integration and collaboration within and across ministries. Therefore, Ministry of Forests and WLRS will continue to work together to advance recommendations.

Based on the Board's examination of tools available under FRPA to protect habitat for species at risk, and forest licensees' compliance with legal requirements, we are pleased that industry was meeting, and sometimes exceeding, those requirements. The recommendations for areas of improvement - including updating policies for managing species at risk habitat, increased transparency of decision making, clear direction on the use and timing of available tools under FRPA, as well as supporting an integrated approach to habitat supply that considers multiple species - are timely as they will enhance commitments already underway between the Ministry of Forests and WLRS.

Specifically, we will incorporate the recommendations into several complementary initiatives and actions across spatial scales to improve stewardship and management of wildlife habitat generally, and the recovery of species at risk specifically.

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Prioritizing Ecosystem Health and Biodiversity:

At the provincial scale, the emerging Biodiversity and Ecosystem Health Framework is intended to provide direction, support prioritization of new policies and guidance, and improve coordination of decision making across ministries, levels of government and various partners to improve ecosystem resilience and halt or reverse biodiversity loss. Ecosystem resilience, particularly in the face of climate change, goes hand in hand with species at risk recovery. By centring on the prioritization of considerations of ecosystem health to ensure the long-term health and well-being of communities and economies, the Framework also aims to realize a shift from species-by-species management to a more holistic ecosystem approach that can better address landscape habitat supply over time.

Policy and Procedures:

As FRPA continues to evolve and improve, we are reviewing a number of policy, procedure and guidance documents. Through collaboration with First Nation partners, and industry stakeholders updating biodiversity guidance and the Identified Wildlife Management Strategy (IWMS), to align with recommendations of the Old Growth Strategic Review, Forest Landscape Planning and modernized Land Use Planning, as well as emerging practices to reduce wildfire risk across forest and grassland landscapes.

Forest Landscape Planning and Objectives:

We agree with the Board that a key to success for species at risk programs is timely implementation of objectives in order to retain or restore the amount, distribution and attributes necessary to achieve population recovery goals. As mentioned in the Board's report, FRPA Section 7 Notices are an efficient way to protect valuable wildlife habitat within the Forest Stewardship regime. However, as the transition into the Forest Landscape Planning regime takes place in partnership with First Nations, wildlife habitat and species at risk objectives or practice requirements will need to be established directly within individual Plan areas. This is predicted to become a more efficient and effective method to set species at risk objectives at the landscape and regional levels because 1) the spatial scales of Forest Landscape Plans enable consideration of specific stand and landscape structural requirements concurrently; 2) through coordinated reforestation or restoration there are opportunities to accelerate recruitment of habitat supply through time.

For broad ranging species, new objectives may require modernized Land Use Planning or species at risk specific planning initiatives. These planning processes engage multiple sectors and require a more detailed socio-economic costs and benefits analysis to support decisions from senior levels of government beyond the Forest and Range Practice Act framework (e.g., Environment and Land Use Committee). New guidance is being developed to improve the clarity of objective setting and level of

decision-making in these diverse circumstances. This guidance will expand on science-based tools, that the Board notes were not fully implemented in the past, with Indigenous and local-level knowledge.

Regulatory Actions:

Updating the Category of Species at Risk and Regionally Important Wildlife, as well as the listing approach is underway. A goal of the proposed process is to streamline updating the lists through a standardized assessment process with a predictable timeframe of review.

Outside of FRPA, a comprehensive review of the *Wildlife Act* is underway, which will inform emerging policies and management guidance for species at risk. The review will improve alignment of the *Wildlife Act* with the *Declaration on the Rights of Indigenous Peoples Act* and meet commitments made under the Together for Wildlife Strategy.

Assessment and Monitoring:

Documenting decisions will help to inform monitoring and future assessment of effectiveness through the Forest and Range Evaluation Program (FREP; and as committed in the Together for Wildlife Strategy). Also, through the Collaborative Indigenous Stewardship Framework, various agreements with First Nations forums, and government to government partnerships, we are improving our collective knowledge on the condition of the land and weaving Indigenous knowledge and western science. This work is contributing to updates to the FREP and Cumulative Effects assessments for wildlife, including species at risk.

This improved information foundation will contribute to an adaptive management approach, not only to understand whether objectives are being achieved, but also providing analyses important for the possibility of triggering revisions to existing or new objectives for species at risk.

Summary

On behalf of the Ministry of Water, Land and Resource Stewardship and Ministry of Forests, I wish to thank the Board for their timely special investigation report and recommendations for improving species at risk management in British Columbia. Ministry staff will continue to assess how best to apply the Forest Practices Board's conclusions to improve programs and outcomes for species at risk.

Sincerely,



Jennifer Psyllakis, PhD
Acting Assistant Deputy Minister

Forest Practices Board

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