

26 January 2016

Mr. Ken Zielke, RPF
Director, Investigations
Forest Practices Board
PO Box 9905, Stn Prov Gov't
Victoria, BC V8W 9R1
via email: ken.zielke@gov.bc.ca

Dear Mr. Zielke:

Re: Response to recommendation in IRC196 – Logging Old Forest on TFL 47 (July 2015)

FPB Recommendation from IRC196 (complaint 141147):

TimberWest should provide the Board with information on how it will interpret the SCCO definition of old forest when conducting forest operations within the SCCO area.

TimberWest response:

As agreed to with Greenpeace, Forest Ethics and Sierra Club, with the assistance of a provincially appointed mediator, in November 2015, TimberWest is using the following Interim Old Forest Field Identification Criteria to guide decision-making under the SCCO and in anticipation of the GBRO:

Interim Red and Blue Listed Field Identification Criteria

A block meets the interim Red and Blue Listed Field Identification criteria if:

- a) It is a floodplain ecosystem; or*
- b) It has an inventory age of 120 years or older; or*
- c) It has a veteran overstory tree layer* remaining; and*
- d) It is a minimum occurrence size of:*
 - i) .25 ha for discrete occurrences*
 - ii) 2 ha for a complex occurrence where the listed community is the dominant community.*

Interim Old Forest Field Identification Criteria

For SSGs with Less than 30% Total Old within Restoration landscape units, stands should be considered old if they have:

- a) an inventory age of 120 years or older; or*
- b) a veteran overstory tree layer* remaining; and*
- c) a minimum occurrence size of:*



- i) 0.25 ha if the stand is mainly comprised of old trees, or*
- ii) 1.0 ha if the stand is a remnant old stand, i.e. mainly comprised of trees that are not old and has a veteran overstory tree layer.*

**Definition of Veteran Overstory Tree Layer:*

A “veteran overstory tree layer” means trees that are considerably older than the rest of the stand and are remnants of a much older stands. Veteran trees will have a much larger diameter and/or height than the main stand. The size and/or age, along with the density of veteran trees required to constitute an old growth stand will be dependent on the characteristics of the rest of the stand as well as the overstory trees (as defined in field manual).

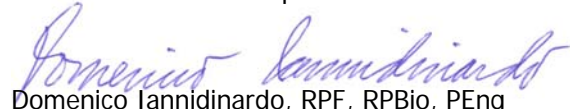
This approach has been adapted from the draft GBRO to help ensure our operations are GBRO compliant going forward. As a result of applying these criteria we have identified 13 cut blocks in our GBR tenures that do not meet GBRO compliance in relation to these criteria. We have committed to not harvesting these blocks unless they can be made compliant.

In addition, these criteria are being used to complete a review of the Thurlow LRD in collaboration with the Sonora community and Rainforest Solutions Project. The results of this review, which should be completed this week, will be provided to G2G for their consideration with the intent that the results will be provided to Terry Lewis and Laurie Kremsater for their final design of the Thurlow LRD. Other agreements are pending with the Sonora Community, RSP and TimberWest that include pathways for TimberWest to forego harvest of block 11-370 while allowing it to become part of a revised BMTA or the Thurlow LRD.

The work that TimberWest has driven around old forest definition work over the last two years has led to this cautionary interim approach. It will be the foundation for the work on the field manual expected to be written upon the enactment of the forthcoming Great Bear Rainforest Order.

Please contact me if you have further questions.

Yours truly,
TimberWest Forest Corp.



Domenico Iannidinaro, RPF, RPBio, PEng
Vice President, Sustainability & Chief Forester

