



File: 280-30/FP BOARD
Ref. 189715

DEC 10 2012

Al Gorley, RPF
Chair, Forest Practices Board
P.O. Box 9905, Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Al Gorley:

On behalf of the Ministry of Forests, Lands and Natural Resource Operations (FLNRO), please accept this letter as government's response to the Forest Practices Board's recommendations in its June 2012 special investigation report, *Conserving Old Growth Forests in BC*.

Recommendations 1-4

1. *Government should develop and maintain a process for tracking OGMA values and incursions that can be updated by licensees or government staff.*
2. *Government should provide appropriate oversight of non-spatial orders (where non-legal OGMAs have not been identified) to ensure that required attributes are available on the land base and, if they are not, that required recruitment stands have been identified.*
3. *Government should create a uniform and consistent way of identifying and recording values within OGMAs and of making the information available to all Crown land tenure holders and agencies that administer those tenures.*
4. *Government should review the conditions of orders to ensure that, if fully exercised, provisions for harvesting or road construction do not materially alter the effectiveness of OGMAs.*

Government response

Collectively, these four recommendations speak to the effectiveness of FLNRO's efforts to identify, record, and track old growth retention under the *Land Act* and *Forest and Range Practices Act* (FRPA), through old growth management areas (OGMAs) and non-spatial old growth orders.

Page 1 of 5

Before responding in full to these recommendations, FLNRO will undertake an internal review to gain an in-depth understanding of how old growth is being managed within each region. Based on this review, we will identify opportunities to improve the identification, recording and tracking of OGMA's and non-spatial old growth orders, and the ecological values they support.

By identifying and analyzing the underlying issues that have led to the Board's recommendations, we will be in a much better position to develop an informed action plan, if necessary, that appropriately addresses the Board's recommendations.

The Resource Management Objectives Branch will lead this internal review, and we expect to be able to report back to the Board by April 2013, with any necessary actions for advancing old growth management.

If an action plan is necessary, it will complement the array of provincial resource management initiatives now underway that aim to integrate, harmonize and improve natural resource decision-making and stewardship across the natural resource sector. For example, our exploration of cumulative effects assessment methods and the Mid-Term Timber Supply Action Plan both necessitate effective tracking, monitoring and assessment of resource values, including old growth, to enable informed and durable integrated decision making.

Recommendation 5

Government should ensure all Crown land tenure holders are required to protect or mitigate the impacts of their activities in OGMA's.

Government response

FLNRO recognizes that an issue exists, and that effective management of old growth over time may require the establishment of common objectives and a consistent approach to old growth retention that applies to all natural resource sectors and activities on the land base. To date, objectives for old growth (both non-spatial and spatial) have been established across the province, under the *Land Act* and FRPA. These objectives currently only apply directly to forestry activities, and may be variably applied in authorizations for other natural resource sector activities.

For the oil and gas sector, a regulation under the *Oil and Gas Activities Act* enables the establishment of OGMA's under the *Land Act* to conserve old seral stage forest in areas subject to oil and gas exploration. Government recently reviewed a research report developed for the oil and gas industry, which explores more detailed criteria for OGMA's to inform future policy guidance for the oil and gas sector. FLNRO will work with the Oil and Gas Commission and industry to ensure future guidance on OGMA objectives and their implementation by the oil and gas sector is reasonably consistent with FLNRO's objectives for and approach to old growth conservation under the *Land Act* and FRPA.

Through our exploration of cumulative effects assessment methodologies, old growth has been identified as a key valued component. Demonstration projects are currently developing and testing methods for assessing and monitoring old growth condition and trend, with a

particular focus on assessing condition relative to established old growth objectives for each demonstration area. We expect that any future implementation of a cumulative effects assessment approach would include monitoring and assessing old growth condition across the province.

Related to this, the Resource Management Objectives Branch is currently reviewing the resource management objectives framework to ensure it provides a comprehensive, robust system of legal and policy-based resource management objectives to support integrated decision making across natural resource sectors. For old growth and other resource values, a comprehensive objectives framework would:

- establish appropriate, consistently-applied objectives for conservation across the land base;
- provide a foundation for ‘results-based’ resource management practices;
- establish enforceable resource value priorities for defined spatial areas;
- provide a sound basis for stewardship effectiveness monitoring;
- reduce resource-use conflicts among tenure holders; and,
- improve equity among resource sectors.

Recommendation 6

Government should develop and implement a strategy to assess the effectiveness of spatial and non-spatial old-growth retention.

Government response

FLNRO has two initiatives underway, under the Forest and Range Evaluation Program (FREP), to gather the necessary data to enable us to assess the effectiveness of OGMAs and other forms of retention in meeting old-growth and landscape-level biodiversity objectives under the *Land Act* and FRPA.

Use of a raster provincial spatial database for landscape level biodiversity assessment

FREP specialists have collaborated with Forest Practices Board staff over the past two years to enhance data reporting capabilities using a provincial spatial database with data summarized in one hectare rasters. The data base includes data acquired from the Hectares BC platform as well as provincial forest cover and land classification data.

This spatial database may be used by FREP, the Board, and others to monitor and assess old growth and landscape-level biodiversity retention. In particular, it enables assessment of three biodiversity indicators (site index by leading tree species; age class [old, mature, mid and young]; and, interior old forest) within three administrative reporting strata:

- Protected land base (e.g., parks, OGMAs);
- Non-contributing land base (outside timber harvesting land base and not protected); and
- Timber harvesting land base.

The valuable work by the Forest Practices Board on this spatial database has allowed FREP staff to take the next step to assess the quality of landscape level biodiversity based on the derived indicators. Further work is now underway to establish biodiversity quality ratings to evaluate generated data.

When combined with FREP's stand-level biodiversity monitoring data (amount and quality of retention within cutblocks), this data will allow the FREP team to assess the effectiveness of OGMAs and other retained areas in meeting old-growth and landscape-level biodiversity objectives.

I would like to take this opportunity to thank the Forest Practices Board for its important contribution to the FREP program by playing such a pivotal role in designing the spatial database we are now using.

For more information on how this data base is informing FREP effectiveness evaluations, please contact Nancy Densmore, Biodiversity Specialist, Resource Practices Branch, at 250-356-5890.

Multiple Resource Value Assessment pilot projects

Currently, the provincial spatial database discussed above is being used by FREP to generate landscape-level biodiversity data for two multiple resource value assessment (MRVA) pilot projects – in the Lakes and Merritt TSAs.

These assessments are looking at the effectiveness of stand and landscape biodiversity retention, as well as other forest practices in these TSAs, in meeting FRPA's resource value objectives.

For biodiversity, the assessments will help answer the question: "is the forested matrix at the landscape level providing the range of habitat understood as necessary for maintaining ecosystem function and old and mature forest-dependent species?"

Because these assessments are looking at multiple resource values at the TSA level, they enable assessment of the interactions of forest practices and their outcomes across the landscape, which will directly support cumulative effects assessments and integrated decision-making.

The MRVA pilot projects are expected to report out by March 31, 2013; in the meantime, if the Board has any questions about these projects, please contact Peter Bradford, Stewardship Evaluation Officer, Resource Practices Branch, at 250 356-2134.

It is likely that the internal review to address Recommendations 1-4 will identify further opportunities, including potential new evaluation questions, to enhance FREP biodiversity effectiveness evaluations. In particular, there may be future opportunities to explore the effectiveness of non-spatial orders, and their implementation, in meeting old growth objectives.

We trust that this response adequately addresses the Board's recommendations at this time. For more information on the internal review, or if the Board has any questions or would like more information, please contact Allan Lidstone, Director, Resource Management Objectives Branch, at 250-356-6255.

Yours truly,

A handwritten signature in blue ink, appearing to be 'DK', followed by a long horizontal flourish.

Doug Konkin
Deputy Minister

pc: Tom Ethier, Assistant Deputy Minister, Resource Stewardship Division
Allan Lidstone, Director, Resource Management Objectives Branch
Jim Sutherland, Director, Resource Practices Branch



Forest Practices Board

File: 97325-20/2009-01

March 4, 2013

Doug Konkin, Deputy Minister
Ministry of Forests, Lands and Natural Resource Operations
780 Blanshard Street
Victoria, BC V8W 2H1

Dear Doug Konkin:

Re: Response to Recommendations in Special Investigation Report FPB/SIR/36 *Conserving Old Growth Forests, Implementation of old-growth retention objectives under FRPA*

Thank you for your letter of December 10, 2012, in response to the Board's recommendations from our June 2013 special investigation report "*Conserving Old Growth Forests in BC*". The Board is pleased that government is supportive of this investigation and its recommendations and, in particular, that MFLNRO is in the process of undertaking an internal review of how old growth is being managed provincially by region. As you move through this review over the next months, we offer to assist by answering any questions you may have from our investigation. As well, we look forward to discussing the outcomes with you when your review concludes in April, 2013.

It is helpful that MFLNRO will be working with the Oil and Gas Commission and industry to ensure that future guidance on old growth management area (OGMA) objectives and their implementation by the oil and gas sector is reasonably consistent with MFLNRO's objectives and implementation for old growth retention. We hope to see some timely progress in this regard.

The Board is also encouraged that MFLNRO is improving tools to conduct analysis of several indicators associated with conservation of biodiversity and old growth retention. This is a step in the right direction. However, in the Board's opinion, it is necessary to go beyond modeling and data analysis exercises that determine if retention targets are being met. Equally important is field monitoring to analyze influences on old growth retention from fire, windthrow, insect damage, road building and salvage harvesting. And perhaps most important, is to engage in a long-term program of research and monitoring that explores and validates the assumptions and uncertainties regarding old growth retention, among other indicators, to ensure adequate conservation of biological diversity in BC over time.

We now consider this investigation closed.

Yours truly,

R. A. (Al) Gorley, RPF

Chair