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Dear Frank Varga:

Thank you for your March 26, 2018, submission in which you made a number of requests related to the Burns Lake Community Forest (BLCF) Mountain Pine Beetle Mitigation Plan (MPBMP). While most of these requests are currently being reviewed by ministry staff, we wish to continue our dialogue and share our current understanding of the MPBMP. We also wish to inform you of our decision regarding some of your requests.

Decision Request #1: Alternative Landscape Connectivity Matrix (LCM)

We would like to further explore the concepts underlying your proposal to amend the Lakes North Sustainable Resource Management Plan (SRMP). To proceed with an amendment requires a thorough review of the information provided in support of the proposed amendment to the LCM and a thoughtful consideration of all implications. At this time, we have questions around the replacement of mature and old coniferous stands with aspen stands, the potential fragmentation of connectivity across landscape units, the potential timber supply benefits, and the co-location with other values.

To answer these questions and discuss the proposal in depth district staff will be contacting you to set up a convenient time to meet. It is our expectation that through this collaborative dialogue we will be in a position to consider the implications of the proposal and assess its merit in moving forward.

Decision Request #2: Managing to the Low Biodiversity Emphasis Option

The low biodiversity emphasis option is designed to provide habitat for a wide range of native species, but with a pattern of natural biodiversity that is significantly altered. This altered pattern means that the risk of some native species being unable to survive in the area will be relatively high. A low biodiversity emphasis option designation for a landscape unit does not preclude the establishment of objectives for other biodiversity characteristics, such as landscape connectivity, or for values that require special management (e.g. wildlife, visual quality, riparian areas).

Within the BLCF, in addition to objectives set by government under sections 5 to 10 of the *Forest Planning and Practices Regulation* (FPPR), biodiversity objectives have been legally established for seral stage distribution, old growth management, landscape connectivity and wildlife tree retention. All these objectives apply at different spatial scales from a stand of trees to a landscape unit. Objectives that are spatially managed in localized areas within a landscape unit (e.g. old growth management areas (OGMAs)) contribute to objectives that broadly apply to a much larger area (e.g. seral stage distribution within a landscape unit). Thus, the amount of mature and old forest within a landscape corridor contributes both to the objectives for the corridor and for the landscape unit.

At the landscape unit level, our records show that the seral stage distribution is characteristic of heavily disturbed areas and is managed consistent with a low biodiversity emphasis. In most landscape units, the amount of old forest is at or close to the minimum targets in the Sub-Boreal Spruce (SBS) while the amount of mature and old forest in the SBS portion of all landscape units is well above the minimum required. These findings do not significantly change by tenure type (e.g. community forest, First Nation Woodland Licence or timber supply area (TSA)) within a landscape unit.

Within landscape units, OGMAs contain a high proportion of old forests. Old forest stands are also found within landscape connectivity corridors and moose winter habitat. However, the total amount of old forests in these spatially defined areas is lower than the legally required minimum aspatial old seral stage target for landscape units. This means that old forest stands must be reserved from harvest in addition to the old forest stands present within OGMAs, LCM and moose winter habitat to meet the old seral target.

Also within landscape units, OGMA, LCM and moose winter habitat contain significant amount of mature and old forest stands. Together, these areas contain slightly more mature and old stands than the minimum aspatial mature and old seral stage targets that apply at the landscape unit level. This means that at the landscape unit level, the aspatial mature and old seral stage targets are entirely met in spatially defined areas established for old growth, connectivity or moose winter survival objectives and no additional areas need to be reserved from harvest as in the case above.

Additionally, specific mature and old seral targets apply within LCM and moose winter habitat. These targets are different than the mature and old targets that are required at the landscape unit level: for example, greater than 70 percent of the forested area within a LCM must be in a mature and old condition as opposed to greater than 11 percent of the forested area within a landscape unit. Currently, the amount of mature and old forests within the LCM and moose winter habitat is below the legally required minimum. So, even though the targets are being met at the landscape unit level, because they are not being met within the LCM and moose winter habitat, further harvest in the LCM or moose winter habitat areas would create an unacceptable risk to natural biodiversity.

Overall, we note that the requirements that apply to the BLCF for old growth, riparian areas, visual quality, wildlife survival and biodiversity are similar to those applied across the Province of British Columbia. We also note that all these requirements are consistent with the Lakes Land and Resource Management Plan (LRMP). Managing for these values can contribute to the achievement of seral stage targets. Since targets are expressed as a minimum, units with more mature and old stands than the required minimum are consistent with government objectives.

For the reasons listed above, we do not share your conclusion that managing for mature and old seral stages within LCM, moose winter habitat areas or for other important values is inconsistent with the LRMP.

Further, the purpose of OGMA is to spatially identify areas that contribute to the overall achievement of old seral stage distribution targets. According to the LRMP and the Lakes South and Lakes North SRMP, old seral stage targets have been established by biogeoclimatic (BEC) zone within each landscape unit. OGMA were selected to capture about 50 to 75 percent of the old target. This means that in each landscape unit and BEC combination (e.g. Burns Lake East/SBS), a portion of the old seral minimum target is achieved by OGMA and a portion needs to be achieved in other areas (e.g. LCM, suitable old stands). The more old area that is captured by OGMA, the less additional areas must be identified and reserved from harvest. Within the BLCF, the amount of old in OGMA is not sufficient to fully meet either the old target or the mature plus old target in any landscape unit/BEC combination. Consequently, we disagree with your conclusion that the current OGMA exceed the old establishment targets.

We also disagree with the conclusion that the old requirement could be met by special management zones only and note that doing so would constitute a significant departure from the LRMP. As described above, the sum of old forests within OGMA, LCM and moose winter habitat is less than the minimum amount required. On average, OGMA capture about half of the old requirement within the BLCF and together, OGMA, LCM and moose winter habitat capture about the same amount due to overlaps. Regarding the conclusion that the BLCF land base is used to meet the old objective for areas outside of the BLCF, we make the following observations:

- As described above, the amount of old forest in all BEC and landscape unit combinations is at or close to the target both inside and outside the BLCF. The only exception is for

the BLCF portion of the SBS within the François East landscape unit where the amount of old exceeds the minimum target by 11 percent;

- OGMA's are established to meet targets at the BEC zone level (e.g. SBS) rather than at the variant level (e.g. SBSmc2);
- OGMA's help meet the old target requirement. The more old area that is captured in an OGMA, the more area is available for harvest outside of the OGMA.

We also make the general observation that there are sufficient mature and old stands within the BLCF to support logging opportunities both in the short- and mid-term. Based on this observation and our review of management requirements within the BLCF, we conclude that objectives set by government for identified values can be fully realized within the BLCF.

Finally, we agree that the visual landscape inventory (VLI) captures large areas that are not visible in perspective from significant viewpoints. The reverse is also true: some areas inventoried as not visible are actually highly visible. It is for this reason that field-based visual impact assessments are recommended to supplement the broad overview provided by the VLI.

Decision Request #3: Scenic Areas Management

Following a review of land use planning around Burns Lake, the Minister concluded in 2014 that altering land use objectives was not in the public interest nor supported by community leaders. Amendments to land use objectives would provide little benefit to the region's timber supply and increase the risk to important environmental values. The review did identify a potential for a slight increase to timber availability by harvesting visually sensitive landscapes in a way that decreases wildfire risk in areas close to communities.

This potential increase is conditional on the treatment being deemed necessary and appropriate to decrease wildfire risk to communities by fuel specialists from the BC Wildfire Service and on the treatment areas being identified in the Community Wildfire Protection Plan (CWPP). Should these conditions be met, the district manager would require – at a minimum – a detailed treatment plan, supporting information from the BC Wildfire Service, and a visual impact assessment to determine the extent to which the fuel treatment conflicts with other established objectives and the actions necessary to manage these objectives. Should amendments to visual quality objectives and/or the forest stewardship plan be necessary to conduct the treatment, public review and First Nations consultation will be required.

Regarding the use of LiDAR, we note that while its use appears to have potential for operational planning, it does not provide information required as per the British Columbia Government's visual landscape inventory procedures and standards. Further, the current provincial visual landscape inventory, which was updated in 2010 for the Lakes TSA, is considered to be the detailed inventory contemplated by the LRMP. Consequently, we are unable to accommodate your request around the approval of LiDAR as an approved visual landscape inventory.

Based on the information provided, it appears that LiDAR has operational potential for managing a suite of resource values and we respect the decision made by BLCF to invest in the technology. We also rely on professionals to ensure their choice of technology leads to on-the-ground results that are consistent with legally established government objectives, public expectations and First Nations rights and interests. While a number of approval decisions are delegated to the district manager, they do not extend to the approval of any methodology a tenure holder chooses to meet its obligations.

Decision Request #4: Ministry Perspective on New Direction for a New Management Plan

In general terms, the ministry perspective on management plans is captured in the *Guidance for Community Forest Agreement Management Plan Amendments and Timber Supply Review (2015)*, which was provided to all clients on June 22, 2015, and to the consultant hired by BLCF to prepare the current management plan on December 1, 2015. A copy of the guidance is attached to this letter.

We understand that the new direction for a new management plan includes a number of aspects including applying an area-based ethos and innovation in the achievement of forest management goals. We are intrigued by these and other aspects and would like to explore their meaning and implication further. To facilitate this, we have requested district staff to set up a meeting with you and we anticipate this meeting to occur by the end of May 2018.

Additional Considerations

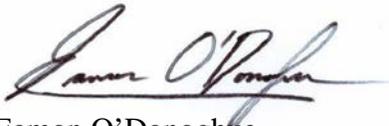
Although not specifically mentioned in the MPBMP, we are aware that the definition of high risk stands in the current allowable annual cut (AAC) is inconsistent with current harvest plans. We also understand that BLCF has completed a timber supply analysis and that a management plan is forthcoming. We believe that the sooner the management plan is submitted, the sooner a new AAC can be determined. We also believe a new long-term sustainable AAC would better support BLCF's work around certification, MPBMP and resource management than the current short-term MPB uplift. Consequently, we encourage you to submit your new management plan – or an amendment to the current plan – along with a new AAC request rationale as soon as possible. We will ensure that sufficient resources are dedicated to review the plan and determine the AAC within a reasonable timeframe.

In closing, we support work that provides for increased timber supply and maintains non-timber values such as biodiversity. The BLCF has shown initiative and innovation to develop creative ideas on how to potentially increase timber supply. With some additional technical work we are confident that some of these opportunities may be realized.

We now have a better understanding of the opportunities you have identified around LCM and the management plan and need to ensure we fully understand what they entail. Once we are satisfied we fully understand your requests around connectivity corridors and biodiversity as well as their implications, we will determine if amendments are required. Staff input and

recommendations will be an important part of our review and we have requested district staff to work directly with you to provide us with additional information. Again, we are supportive of the work undertaken by the BLCF and hope to work with you to achieve common goals.

Yours truly,



Eamon O'Donoghue
Regional Executive Director
Skeena Region



Brent May
District Manager
Nadina Natural Resource District

Attachment(s):

1. *Guidance for Community Forest Agreement Management Plan Amendments and Timber Supply Review (2015)*
2. Seral stage analysis results