

Old Growth Strategic Review Recommendations & Immediate Deferrals in Squamish Nation Territory

From: Johnathon Strebly <Johnathon_Strebly@squamish.net>
To: OfficeofthePremier, Office PREM:EX <Premier@gov.bc.ca>, Minister, FLNR
FLNR:EX <FLNR.Minister@gov.bc.ca>

Cc:

Kristen Rivers <Kristen_Rivers@squamish.net>, Joshua Joseph
<Joshua_Joseph@squamish.net>, Khelsilem <khelsilem@squamish.net>, Chris
Lewis <chris_lewis@squamish.net>, Alexis, Pam LASS:EX
<Pam.Alexis.MLA@leg.bc.ca>, Anderson, Brittny LASS:EX
<Brittny.Anderson.MLA@leg.bc.ca>, Ashton.MLA, Dan LASS:EX
<Dan.Ashton.MLA@leg.bc.ca>, Babchuk, Michele LASS:EX
<Michele.Babchuk.MLA@leg.bc.ca>, Bailey, Brenda LASS:EX
<Brenda.Bailey.MLA@leg.bc.ca>, Bains.MLA, Harry LASS:EX
<Harry.Bains.MLA@leg.bc.ca>, Banman.MLA, Bruce LASS:EX
<Bruce.Banman.MLA@leg.bc.ca>, Beare.MLA, Lisa LASS:EX
<Lisa.Beare.MLA@leg.bc.ca>, Begg.MLA, Garry LASS:EX
<Garry.Begg.MLA@leg.bc.ca>, Bernier.MLA, Mike LASS:EX
<Mike.Bernier.MLA@leg.bc.ca>, Bond.MLA, Shirley LASS:EX
<Shirley.Bond.MLA@leg.bc.ca>, Brar.MLA, Jagrup LASS:EX
<Jagrup.Brar.MLA@leg.bc.ca>, Cadieux.MLA, Stephanie LASS:EX
<Stephanie.Cadieux.MLA@leg.bc.ca>, Chandra Herbert.MLA, Spencer LASS:EX
<s.chandraherbert.mla@leg.bc.ca>, Chant, Susie LASS:EX
<Susie.Chant.MLA@leg.bc.ca>, Chen.MLA, Katrina LASS:EX
<Katrina.Chen.MLA@leg.bc.ca>, Chouhan.MLA, Raj LASS:EX
<Raj.Chouhan.MLA@leg.bc.ca>, Chow.MLA, George LASS:EX
<George.Chow.MLA@leg.bc.ca>, Clovechok.MLA, Doug LASS:EX
<Doug.Clovechok.MLA@leg.bc.ca>, Conroy.MLA, Katrine LASS:EX
<Katrine.Conroy.MLA@leg.bc.ca>, Coulter, Dan LASS:EX
<Dan.Coulter.MLA@leg.bc.ca>, Cullen, Nathan LASS:EX
<Nathan.Cullen.MLA@leg.bc.ca>, Davies.MLA, Dan LASS:EX
<Dan.Davies.MLA@leg.bc.ca>, de Jong.MLA, Mike LASS:EX
<Mike.deJong.MLA@leg.bc.ca>, D'Eith.MLA, Bob LASS:EX
<Bob.Deith.MLA@leg.bc.ca>, Dean.MLA, Mitzi LASS:EX
<Mitzi.Dean.MLA@leg.bc.ca>, Dix.MLA, Adrian LASS:EX
<Adrian.Dix.MLA@leg.bc.ca>, Doerkson.MLA, Lorne LASS:EX
<Lorne.Doerkson.MLA@leg.bc.ca>, Donnelly, Fin LASS:EX
<Fin.Donnelly.MLA@leg.bc.ca>, Dykeman, Megan LASS:EX
<Megan.Dykeman.MLA@leg.bc.ca>, Eby.MLA, David LASS:EX
<David.Eby.MLA@leg.bc.ca>, Elmore.MLA, Mable LASS:EX
<Mable.Elmore.MLA@leg.bc.ca>, Farnworth.MLA, Mike LASS:EX
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<Rob.Fleming.MLA@leg.bc.ca>, Furstenau.MLA, Sonia LASS:EX
<Sonia.Furstenau.MLA@leg.bc.ca>, Glumac.MLA, Rick LASS:EX
<Rick.Glumac.MLA@leg.bc.ca>, Greene, Kelly LASS:EX
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<George.Heyman.MLA@leg.bc.ca>, Horgan.MLA, John LASS:EX
<John.Horgan.MLA@leg.bc.ca>, Kahlon.MLA, Ravi LASS:EX
<Ravi.Kahlon.MLA@leg.bc.ca>, Kang.MLA, Anne LASS:EX
<Anne.Kang.MLA@leg.bc.ca>, Kirkpatrick.MLA, Karin LASS:EX
<Karin.Kirkpatrick.MLA@leg.bc.ca>, Kylo.MLA, Greg LASS:EX
<Greg.Kylo.MLA@leg.bc.ca>, Lee.MLA, Michael LASS:EX
<Michael.Lee.MLA@leg.bc.ca>, Leonard.MLA, Ronna-Rae LASS:EX <Ronna-
Rae.Leonard.MLA@leg.bc.ca>, Letnick.MLA, Norm LASS:EX
<Norm.Letnick.MLA@leg.bc.ca>, Lore, Grace LASS:EX
<Grace.Lore.MLA@leg.bc.ca>, Ma.MLA, Bowinn LASS:EX
<Bowinn.Ma.MLA@leg.bc.ca>, sheila.malcolmson.MLA@leg.bc.ca, Mark.MLA,
Melanie LASS:EX <Melanie.Mark.MLA@leg.bc.ca>, Mercier, Andrew LASS:EX
<Andrew.Mercier.MLA@leg.bc.ca>, Merrifield.MLA, Renee LASS:EX
<Renee.Merrifield.MLA@leg.bc.ca>, Milobar.MLA, Peter LASS:EX
<Peter.Milobar.MLA@leg.bc.ca>, Morris.MLA, Mike LASS:EX
<Mike.Morris.MLA@leg.bc.ca>, Oakes.MLA, Coralee LASS:EX
<Coralee.Oakes.MLA@leg.bc.ca>, Olsen.MLA, Adam LASS:EX
<Adam.Olsen.MLA@leg.bc.ca>, Osborne, Josie LASS:EX
<Josie.Osborne.MLA@leg.bc.ca>, Paddon, Kelli LASS:EX
<Kelli.Paddon.MLA@leg.bc.ca>, Paton.MLA, Ian LASS:EX
<Ian.Paton.MLA@leg.bc.ca>, Popham.MLA, Lana LASS:EX
<Lana.Popham.MLA@leg.bc.ca>, Ralston.MLA, Bruce LASS:EX
<Bruce.Ralston.MLA@leg.bc.ca>, Rankin, Murray LASS:EX
<Murray.Rankin.MLA@leg.bc.ca>, Rice.MLA, Jennifer LASS:EX
<Jennifer.Rice.MLA@leg.bc.ca>, Robinson.MLA, Selina LASS:EX
<Selina.Robinson.MLA@leg.bc.ca>, Ross.MLA, Ellis LASS:EX
<Ellis.Ross.MLA@leg.bc.ca>, Routledge.MLA, Janet LASS:EX
<Janet.Routledge.mla@leg.bc.ca>, Routley.MLA, Douglas G LASS:EX
<Douglas.Routley.MLA@leg.bc.ca>, Russell, Roly LASS:EX

<Douglas.Routley.MLA@leg.bc.ca>, Russell, Roly LASS:EX
<Roly.Russell.MLA@leg.bc.ca>, Rustad.MLA, John LASS:EX
<John.Rustad.MLA@leg.bc.ca>, Sandhu, Harwinder LASS:EX
<Harwinder.Sandhu.MLA@leg.bc.ca>, Sharma, Niki LASS:EX
<Niki.Sharma.MLA@leg.bc.ca>, Shypitka.MLA, Tom LASS:EX
<Tom.Shypitka.MLA@leg.bc.ca>, Simons.MLA, Nicholas LASS:EX
<Nicholas.Simons.MLA@leg.bc.ca>, Sims.MLA, Jinny LASS:EX
<Jinny.Sims.MLA@leg.bc.ca>, Singh, Aman LASS:EX
<Aman.Singh.MLA@leg.bc.ca>, Singh.MLA, Rachna LASS:EX
<Rachna.Singh.MLA@leg.bc.ca>, Starchuk, Mike LASS:EX
<Mike.Starchuk.MLA@leg.bc.ca>, Stewart.MLA, Ben LASS:EX
<Ben.Stewart.MLA@leg.bc.ca>, Stone.MLA, Todd LASS:EX
<Todd.Stone.MLA@leg.bc.ca>, Sturdy.MLA, Jordan LASS:EX
<Jordan.Sturdy.MLA@leg.bc.ca>, Tegart.MLA, Jackie LASS:EX
<Jackie.Tegart.MLA@leg.bc.ca>, Walker, Adam LASS:EX
<Adam.Walker.MLA@leg.bc.ca>, Wat.MLA, Teresa LASS:EX
<Teresa.Wat.MLA@leg.bc.ca>, Whiteside, Jennifer LASS:EX
<Jennifer.Whiteside.MLA@leg.bc.ca>, Wilkinson.MLA, Andrew LASS:EX
<Andrew.Wilkinson.MLA@leg.bc.ca>, Yao.MLA, Henry LASS:EX
<Henry.Yao.MLA@leg.bc.ca>

Sent: June 10, 2021 1:20:12 PM PDT

Attachments: image001.png, 2021-06-10 Ltr re Old Growth Strategic Review Recommendations & Immediate Deferrals in SN Territory - Signed SECURED[6].pdf

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Dear Premier Horgan and Minister Conroy,

Swxwú7mesh Úxwumixw, the Squamish Nation, calls for urgent action from the government of British Columbia regarding old growth logging in Squamish Nation territory. Please see the attached letter for details to this call to action.

We look forward to further discussions around this issue.

Chen wanáxwstúmi (respectfully),

Johnathon Strebly
Chief of Staff

T 604-362-3511

squamish.net<<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.squamish.net%2F&data=04%7C01%7Cflnr.minister%40gov.bc.ca%7Cf5fec35690e1441633eb08d92c4d28e1%7C6fdb52003d0d4a8ab036d3685e359adc%7C0%7C0%7C637589532201296379%7CUnknown%7CTWFPbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQljojV2luMzliLCJBTiI6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=xLdKtbH7JTS5R%2Bf1uHhnY8I5eNlo%2F1iDOU8CUyPVE8w%3D&reserved=0>>

Pronouns: he/him

[Logo_Wordmark_Positive_2Col_RGB_72]<<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.squamish.net%2F&data=04%7C01%7Cflnr.minister%40gov.bc.ca%7Cf5fec35690e1441633eb08d92c4d28e1%7C6fdb52003d0d4a8ab036d3685e359adc%7C0%7C0%7C637589532201296379%7CUnknown%7CTWFPbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQljojV2luMzliLCJBTiI6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=xLdKtbH7JTS5R%2Bf1uHhnY8I5eNlo%2F1iDOU8CUyPVE8w%3D&reserved=0>>

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Skwxwú7mesh
Úxwumixw

Premier John Horgan
Province of British Columbia
PO BOX 9041 STN PROV GOVT
VICTORIA, BC V8W 9E1

Page 1 of 4

June 10, 2021

Dear Premier Horgan and Minister Conroy:

Re: Old Growth Strategic Review Recommendations & Immediate Deferrals

Skwxwú7mesh Úxwumixw, the Squamish Nation, calls on the British Columbia Ministry of Forests, Lands Natural Resource Operations and Rural Development to act on our comments and concerns regarding the failure of the BC government to take steps to implement the urgent recommendations of the Old Growth Strategic Review panel. This call requires BC to take meaningful action toward honouring your commitments regarding old-growth forest management, including the implementation of immediate logging deferrals, and enabling the full participation of Indigenous Nations in these processes.

BACKGROUND

Indigenous Nations throughout BC have strong relationships with our forests stemming from thousands of years of Indigenous-led stewardship. Despite this relationship, and the deep knowledge it provides, our Nations have been left out of decision-making processes regarding our resources and have watched the destruction of our forests from commercial logging and other developments.

In September 2020, the BC government announced their new, holistic approach to protecting old-growth forests and committed to implementing all of the recommendations put forward by the April 2020 Old Growth Strategic Review report. These recommendations, particularly as they relate to collaboration with Indigenous Nations and protection of at-risk forests, presented BC with the opportunity to build lasting and meaningful relationships with Indigenous communities and to realize your commitment to reconciliation. However, as of now, no meaningful action has been taken to implement these



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Úxwumixw

recommendations and our forests – and the many Aboriginal rights that rely on them – remain at risk.

THE SQUAMISH NATION'S CONCERNS

Our forests play an integral ecological role in the biodiversity and health of BC ecosystems and possess incalculable and irreplaceable cultural value and significance for our Nation.

In light of the ongoing risk of development to old-growth forests and the importance of these forests to our Nation's well-being – including our cultural, spiritual and economic needs – we demand that the BC government take immediate and sustained action to defer all harvest and development activities within areas of concern and to ensure that we as a Nation are included, consulted, and enabled to provide free, prior and informed consent respecting all commercial activity within our traditional territory.

In particular, we call on BC to enact the following:

- Immediately defer all harvest and harvest related activities (including road building) in all remaining old growth forests in our territory, , using any and all tools available to you (for example, by instructing BC Timber Sales to cease any development in the area and/or by declining new permits and licenses);
- Immediately defer harvest in all areas where the status of old forest is in doubt or there is insufficient data to conclude that the forest is not at risk (that is, enable the precautionary principle);
- Immediately defer harvest in forests with high ecological and cultural values, which are essential to long-term resilience and recovery in our territory, such as mature forests that are high volume or highly productive, at least until recovery and regenerative planning is complete;



Skwxwú7mesh
Úxwumixw

- Support our Nation in developing a new planning process, based in both our Indigenous knowledge and science to ensure long-term ecological integrity and economic opportunities for our citizens; and
- Establish and support a Government-to-Government approach to decision-making that respects our sovereignty and ensures a well-resourced, transparent, and accountable approach to the paradigm shift for old growth management in BC.

CONCLUSION

We remind the province that in the Tsilhqot'in Nation case, the BC Supreme Court found that BC's entire forestry regime was ultra vires provincial powers. This determination resulted from the province's prioritization of maximizing economic return from forests over the protection and preservation of these spaces for Indigenous well-being and rights exercises. Further, the Court found that BC's forestry practices could not be justified without reference to a detailed record of species needs and a full and robust understanding of an Indigenous Nation's specific rights practices. These determinations on forestry rights highlight some of the problems that remain within the Province's current regime which have not been altered to implement court guidance.

In addition, BC has committed to upholding the minimum human rights standards in the United Nations Declaration on the Rights of Indigenous Peoples. These include standards regarding the right to be involved in decision-making, land stewardship, and the necessity to obtain free, prior, and informed consent. By adopting the Declaration on the Rights of Indigenous Peoples Act, the province must interpret laws of British Columbia through lens of the UN Declaration and ensure the human rights of Indigenous peoples are being upheld.



Skwxwú7mesh
Úxwumixw

Our Nation is committed to ensuring that fundamental changes are made to the forest management approaches and priorities within BC and that the Crown recognizes our right to be involved in land-based decisions that are made on our territory. We believe that the Old Growth Recommendations are a good first step to seeing these changes come to fruition.

Given the high risk to ecological and cultural values associated with ongoing old-growth logging in our territory and in BC more broadly, we cannot stress enough the urgency of this call to action and the need for your rapid response. As such, we call on the Minister to make deferrals for the forests within our territory and to begin the process of engaging with our community in a way that is consistent with the BC Government's commitments under the Declaration on the Rights of Indigenous Peoples Act and the honour of the Crown.

Sincerely,

Tiyáltelut - Kristen Rivers
Squamish Nation
Council Co-Chair

Skwetsí7meltxw - Joshua Joseph
Squamish Nation
Council Co-Chair

cc: The Honourable Murray Rankin, QC, MLA, Minister of MIRR



November 29 2021

Hon. Katrine Conroy
Minister of Forests, Lands,
Natural Resource Operations
and Rural Development
PO Box 9049 Stn
ProvGovt Victoria, BC,
V8W9E2

Sent via email: FLNR.Minister@gov.bc.ca

Dear Minister Conroy,

Re: Update on 2 Year Old Growth Deferral Areas Proposed by Technical Advisory Panel

Tla'amin Nation is currently reviewing the TAP old growth deferral proposals in the context of our treaty rights and obligations, and in the context of the old growth deferral decisions our government made earlier this year.

It is our responsibility to make old growth deferral decisions within our area, working closely with Nations with whom we have shared territory agreements and other governments. When our team has completed our analysis, we will advise you of our decisions regarding old growth deferrals, most likely in mid-January 2022. In the meantime, our decision that there will be no old growth harvesting within the Tla'amin area is still in force.

Sincerely,

Hegus John S. Hackett

Cc: Shannon Janzen, Vice President and Chief Forester, Western Forest Products,
sjanzen@westernforest.com
hiwus Henry Warren Paull , shíshálh Nation, wpaul@shishalh.com
Nicholas Simons, MLA Powell River- Sunshine Coast Nicholas.Simons.MLA@leg.bc.ca
Diane Nicholls, Chief Forester, Resource Stewardship Division,
Diane.Nicholls@gov.bc.ca
Allan Johnsrude, South Coast Natural Resource Region, Allan.Johnsrude@gov.bc.ca
Wendy Hamod, South Coast Natural Resource Region, wendy.hamod@gov.bc.ca
Derek Lefler, Sunshine Coast Natural Resource District Manager,
Derek.Lefler@gov.bc.ca
Patrick Brabazon, qathet Regional District, pbrabazon@qathet.ca
Mayor Dave Formosa, City of Powell River, dformosa@powellriver.ca
Hon. Murray Rankin, Minister of Indigenous Relations and Reconciliation,
IRR.minister@gov.bc.ca
Chris Hamilton, Executive Advisor of Treaty Renewal, Chris.Hamilton@gov.bc.ca

FW: Minister Katrine Conroy - Letter re: Old Growth announcement from the^{s.16}

s.16

From: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
To: Jones, Tristan FLNR:EX <Tristan.Jones@gov.bc.ca>
Cc: Brown, Edena FLNR:EX <Edena.Brown@gov.bc.ca>, Malo, Courtney FLNR:EX
<Courtney.Malo@gov.bc.ca>, Andrews, Scott FLNR:EX <Scott.Andrews@gov.bc.ca>, Tripp,
Allison FLNR:EX <Allison.Tripp@gov.bc.ca>
Sent: November 24, 2021 10:46:23 AM PST
Attachments: Oldgrowthannouce.ltrtoGovtHonKatrineConroyFLNRO.pdf, image001.png, image003.jpg
FYI. We'll send for response.
Thanks,
Sara Wilson
Team Lead, Client Services and Information Management
Deputy Minister's Office
Ministry of Forests, Lands, Natural Resource Operations and Rural Development
P: 778 698-9035



s.16

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Withheld pursuant to/removed as

s.16

FW: FNLG Meeting for Squamish Nation

From: Newcombe, Samantha FLNR:EX <Samantha.Newcombe@gov.bc.ca>
To: Malo, Courtney FLNR:EX <Courtney.Malo@gov.bc.ca>
Cc: Silverio, Lisa FLNR:EX <Lisa.Silverio@gov.bc.ca>
Sent: November 29, 2021 2:05:40 PM PST
Attachments: image001.png, image002.jpg
Is this something we have control over? Or would they have to contact FLNG to schedule this?

Sam

From: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
Sent: November 29, 2021 11:54 AM
To: Silverio, Lisa FLNR:EX <Lisa.Silverio@gov.bc.ca>; Newcombe, Samantha FLNR:EX <Samantha.Newcombe@gov.bc.ca>
Subject: FW: FNLG Meeting for Squamish Nation

Thanks,
Sara Wilson
Team Lead, Client Services and Information Management
Deputy Minister's Office
Ministry of Forests, Lands, Natural Resource Operations and Rural Development
P: 778 698-9035



From: Ma, Bowinn <S.17>
Sent: November 26, 2021 3:37 PM
To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
Cc: Khelsilem <khelsilem@squamish.net>; Peter Baker <Peter_Baker@squamish.net>
Subject: FNLG Meeting for Squamish Nation

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Dear Minister's Staff,

I'm reaching out on behalf of the Squamish Nation to request a meeting slot for them at FNLG (whenever the new dates are set, as I understand it's been postponed) to discuss "Old Growth & Squamish Spit".

Peter Baker is the Director of Rights and Title for the Squamish Nation and the best contact person to make arrangements with. He is copied on this email and can also be reached at 604-317-3419.

In your service,

Bowinn Ma, MLA

North Vancouver-Lonsdale

Skwxwú7mesh-ulh Temíxw & səliłwətaʔt təməxw

Community Office: 604-981-0033 | 50-221 W. Esplanade Ave, North Vancouver, BC, V7M 3J3

BowinnMaMLA.ca | Fb.com/BowinnMa | @BowinnMa

شما و خانوادہ تان اولویت اول من هستی

FW: Forestry Issues

From: Newcombe, Samantha FLNR:EX <Samantha.Newcombe@gov.bc.ca>
To: FLNR Deputy Minister's Office FLNR:EX <FLNR.DMO@gov.bc.ca>
Cc: Silverio, Lisa FLNR:EX <Lisa.Silverio@gov.bc.ca>, Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>
Sent: November 29, 2021 3:56:04 PM PST
Attachments: image001.jpg

Hey Allison,

Deferring this one over to staff for now as per Rick's instructions below. Will keep on MKC's meeting list for the New Year. Cliff# 268636

Thanks,
Sam

From: Cuddy, Andrew FLNR:EX <Andrew.Cuddy@gov.bc.ca>

Sent: November 29, 2021 3:36 PM

To: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>; Olsson, Liz V FLNR:EX <Liz.Olsson@gov.bc.ca>

Cc: Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>; Sheldrake, Jeff FLNR:EX <Jeff.Sheldrake@gov.bc.ca>; Silverio, Lisa FLNR:EX <Lisa.Silverio@gov.bc.ca>

Subject: RE: Forestry Issues

Yes that sounds like a good plan.

From: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>

Sent: November 29, 2021 2:46 PM

To: Olsson, Liz V FLNR:EX <Liz.Olsson@gov.bc.ca>; Cuddy, Andrew FLNR:EX <Andrew.Cuddy@gov.bc.ca>

Cc: Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>; Sheldrake, Jeff FLNR:EX <Jeff.Sheldrake@gov.bc.ca>

Subject: RE: Forestry Issues

Andrew, given the ask was for FNLG and for meeting with senior staff on broader issues (they note a good local relationship with our staff), I could suggest the deputy office reply that we could arrange a technical call with the Nation and the MO would seek time early in the new year for a meet with Chief and Council.

From: Olsson, Liz V FLNR:EX <Liz.Olsson@gov.bc.ca>

Sent: November 29, 2021 2:10 PM

To: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>

Cc: Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>; Sheldrake, Jeff FLNR:EX <Jeff.Sheldrake@gov.bc.ca>

Subject: Forestry Issues

Rick incoming received for you and MKC to meet with Skwxwú7mesh Úxwumixw (Squamish Nation). They missed the deadline to request a mtg via FNLG

Liz

From: FLNR Deputy Minister's Office FLNR:EX <FLNR.DMO@gov.bc.ca>

Sent: November 29, 2021 11:59 AM

To: Olsson, Liz V FLNR:EX <Liz.Olsson@gov.bc.ca>

Subject: FW: Forestry Issues

FYI

From: Peter Baker <Peter_Baker@squamish.net>

Sent: November 26, 2021 2:42 PM

To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>; Conroy, MLA, Katrine LASS:EX <Katrine.Conroy.MLA@leg.bc.ca>;

FLNR Deputy Minister's Office FLNR:EX <FLNR.DMO@gov.bc.ca>

Cc: Khelsilem <khelsilem@squamish.net>; Kathleen Edwards <Kathleen_Edwards@squamish.net>; Arthur Macapagal <Arthur_Macapagal@squamish.net>

Subject: Forestry Issues

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Dear Minister Conroy and Deputy Minister Manwaring,

We write to you requesting a virtual one-on-one meeting at this year's B.C. Cabinet & First Nations Leaders'

Gathering. Although we understand that we missed the deadline for registration, it is our hope that through your ministry, our governments can come together to discuss urgent issues that span our 670,000 hectares, and directly

impact the livelihoods, communities, land base, and economies of both our Nation and many British Columbians and Canadians.

Our Rights and Title Department has been making great strides in developing and building meaningful relationships with your staff in a continued path towards lasting and meaningful reconciliation. During the upcoming BC Cabinet & First Nations Leaders' Gathering, we hope to discuss the following:

- **Co-operation and joint decision-making** - It is important that we work together in-line with DRIPA to develop meaningful means to co-govern forestry management
- **Non-Timber Values** - It is imperative that non-timber values in forests be recognized - the climate change and events of the past two weeks have underlined the need for urgent and direct intervention
- **Framework Sustainability** - The current forestry framework is unsustainable and results in outcomes that are in direct conflict with the objectives of your government and ours. It is vital that we work together towards a system that incentivizes our common objectives
- **Communication** - We value the relationship with local FLNRORD staff, but need to improve relationships with staff working on broader initiatives that constrain work at local levels.

We understand and appreciate the importance of meaningful Government to Government dialogue that fosters relationship building which can lead towards a clear and sustainable path forward. It is our hope that we can discuss these issues further over the course of this year's B.C. Cabinet & First Nations Leaders' Gathering. This meaningful engagement with yourself and key staff will allow for greater understanding of each of our respective priorities and values.

It is with great hope that our parties can meet between November 30 and December 1.

Huy chexw a,

Peter Baker, MEd

Director, Rights & Title

T 604-982-0510

C 604-317-3419

F 604-982-0515

squamish.net



**Skwxwú7mesh
Úxwumixw**

**Ta na wa Yúus ta Stitúyntsam
Rights & Title**

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FW: LTR re: TAP OG Deferrals

From: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
To: Jones, Tristan FLNR:EX <Tristan.Jones@gov.bc.ca>, Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>
Cc: Brown, Edena FLNR:EX <Edena.Brown@gov.bc.ca>, Malo, Courtney FLNR:EX <Courtney.Malo@gov.bc.ca>, Andrews, Scott FLNR:EX <Scott.Andrews@gov.bc.ca>
Sent: November 30, 2021 1:45:40 PM PST
Attachments: image002.png, image001.jpg, image005.png, LTR Minister Conroy re TAP OG deferrals - Nov 29 2021.pdf

FYI. We'll file.

Thanks,

Sara Wilson

Team Lead, Client Services and Information Management

Deputy Minister's Office

Ministry of Forests, Lands, Natural Resource Operations and Rural Development

P: 778 698-9035



From: Losa Luaifoa <losa.luaifoa@tn-bc.ca>

Sent: November 30, 2021 8:55 AM

To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>

Cc: Shannon Janzen <sjanzen@westernforest.com>; wpaul@shishalh.com; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>; Johnsrude, Allan N FLNR:EX <Allan.Johnsrude@gov.bc.ca>; Hamod, Wendy D FLNR:EX <wendy.hamod@gov.bc.ca>; Lefler, Derek FLNR:EX <Derek.Lefler@gov.bc.ca>; Patrick Brabazon <pbrabazon@qathet.ca>; dformosa@powellriver.ca; Minister, IRR IRR:EX <IRR.Minister@gov.bc.ca>; Hamilton, Chris IRR:EX <Chris.Hamilton@gov.bc.ca>; nicholas.simons.mla@leg.bc.ca.ca; Stefan Virtue <stefan.virtue@tn-bc.ca>

Subject: LTR re: TAP OG Deferrals

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hello Minister Conroy

Pls. see the attached correspondence on behalf of Hegus John Hackett.

If you have any issues accessing the attachment, I can be reached at 778-762-3716.

Regards,

Losa

Losa Luaifoa

Executive Assistant

Direct line: 778-762-3716

604-483-9646 ext. 124





November 29 2021

Hon. Katrine Conroy
Minister of Forests, Lands,
Natural Resource Operations
and Rural Development
PO Box 9049 Stn
ProvGovt Victoria, BC,
V8W9E2

Sent via email: FLNR.Minister@gov.bc.ca

Dear Minister Conroy,

Re: Update on 2 Year Old Growth Deferral Areas Proposed by Technical Advisory Panel

Tla'amin Nation is currently reviewing the TAP old growth deferral proposals in the context of our treaty rights and obligations, and in the context of the old growth deferral decisions our government made earlier this year.

It is our responsibility to make old growth deferral decisions within our area, working closely with Nations with whom we have shared territory agreements and other governments. When our team has completed our analysis, we will advise you of our decisions regarding old growth deferrals, most likely in mid-January 2022. In the meantime, our decision that there will be no old growth harvesting within the Tla'amin area is still in force.

Sincerely,

Hegus John S. Hackett

Cc: Shannon Janzen, Vice President and Chief Forester, Western Forest Products,
sjanzen@westernforest.com
hiwus Henry Warren Paull , shíshálh Nation, wpaul@shishalh.com
Nicholas Simons, MLA Powell River- Sunshine Coast Nicholas.Simons.MLA@leg.bc.ca
Diane Nicholls, Chief Forester, Resource Stewardship Division,
Diane.Nicholls@gov.bc.ca
Allan Johnsrude, South Coast Natural Resource Region, Allan.Johnsrude@gov.bc.ca
Wendy Hamod, South Coast Natural Resource Region, wendy.hamod@gov.bc.ca
Derek Lefler, Sunshine Coast Natural Resource District Manager,
Derek.Lefler@gov.bc.ca
Patrick Brabazon, qathet Regional District, pbrabazon@qathet.ca
Mayor Dave Formosa, City of Powell River, dformosa@powellriver.ca
Hon. Murray Rankin, Minister of Indigenous Relations and Reconciliation,
IRR.minister@gov.bc.ca
Chris Hamilton, Executive Advisor of Treaty Renewal, Chris.Hamilton@gov.bc.ca

FW: s.16 to BC letter re Collective Response to BC's Old Growth Deferrals & Implementation of the Old Growth Strategic Review

From: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
To: Jones, Tristan FLNR:EX <Tristan.Jones@gov.bc.ca>
Cc: Brown, Edena FLNR:EX <Edena.Brown@gov.bc.ca>, Malo, Courtney FLNR:EX <Courtney.Malo@gov.bc.ca>, Tripp, Allison FLNR:EX <Allison.Tripp@gov.bc.ca>, Andrews, Scott FLNR:EX <Scott.Andrews@gov.bc.ca>
Sent: November 30, 2021 3:12:07 PM PST
Attachments: image004.png, image006.png, s.16 to BC Collective Response - Old Growth deferrals.pdf, image008.jpg, image005.png, image002.png, image003.png, image001.png
FYI. We'll send for response.
Thanks,
Sara Wilson
Team Lead, Client Services and Information Management
Deputy Minister's Office
Ministry of Forests, Lands, Natural Resource Operations and Rural Development
P: 778 698-9035



From: Conroy.MLA, Katrine <Katrine.Conroy.MLA@leg.bc.ca>
Sent: November 30, 2021 1:04 PM
To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
Cc: Minister, IRR IRR:EX <IRR.Minister@gov.bc.ca>
Subject: FW:s.16to BC letter re Collective Response to BC's Old Growth Deferrals & Implementation of the Old Growth Strategic Review

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

FYI to both Ministries.
CY

s.16

EX

Page 27 of 28

Withheld pursuant to/removed as

s.16

1100 Squamish-Lillooet Regional District Re Old Growth Recreation Sites Inva.ics

Status: BUSY
Priority: Normal (5)
Address: 1 866 279 1594 #303364
Calendar Item Type: REQUEST

RE: CBC North on Old Growth around Prince George

From: Diane.Nicholls@gov.bc.ca
To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>, Berg, Shane FLNR:EX <Shane.Berg@gov.bc.ca>, O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>
Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Sent: January 7, 2021 1:46:03 PM PST
Attachments: image001.jpg
Apologies for not responding sooner.

The OCF is the ministry liason with the board and coordinates all responses and ensures senior level review prior to responses going back to the board. This was recently reviewed with ADMs and agreed to.

My staff have reached out to the North Area Staff, FAIB and will if not already reach out to RSD for this response.

Shane will ensure that this is done.

OCF does not do the responses, but engages all that need to be in order to get a response developed – reason for this is that the OCF does not have all the knowledge required to respond a lot of the times to different reports so we go to the subject matter experts. We also ensure that cross ministry responses (required for this response) are completed and pulled together for a comprehensive response.

Thanks all.

Diane Nicholls, RPF

Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>
Sent: January 7, 2021 1:22 PM
To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Subject: RE: CBC North on Old Growth around Prince George

I am 99% sure OCF responds to all FPB reports. I believe North Area staff are working with Diane's team on a response. We should get Brian engaged too.



Eamon O'Donoghue
Assistant Deputy Minister
Regional Operations – North Area
Phone (250) 847-7495
Cell (250) 877-1087
**Forests, Lands, Natural Resource Operations
and Rural Development**
(he/him/his)

From: Muter, David FLNR:EX <David.Muter@gov.bc.ca>
Sent: January 7, 2021 1:02 PM

To: O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>

Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>

Subject: RE: CBC North on Old Growth around Prince George

Brian and I can help with some of the response (how the FPB report relates to the OG report). Though I don't think RSD is the lead on the response for this report.

Diane – is your shop leading the response on this report

Thanks

D

From: O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>

Sent: January 6, 2021 9:17 AM

To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>

Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>

Subject: FW: CBC North on Old Growth around Prince George

David or perhaps Diane,

Just wondering if you know if we are drafting a response to the FPB on this report and who is leading? If we respond, I believe a big part of our response should include the work we are doing through ESI and ultimately in a proposed land use planning mandate.

Let me know if we can be of help.



Eamon O'Donoghue

Assistant Deputy Minister

Regional Operations – North Area

Phone (250) 847-7495

Cell (250) 877-1087

**Forests, Lands, Natural Resource Operations
and Rural Development**

(he/him/his)

From: O'Donoghue, Eamon G FLNR:EX

Sent: January 6, 2021 8:56 AM

To: Haslam, David GCPE:EX <David.Haslam@gov.bc.ca>

Cc: Muter, David FLNR:EX <David.Muter@gov.bc.ca>; Rawling, Greg FLNR:EX <Greg.Rawling@gov.bc.ca>; Calof, Justin FLNR:EX <Justin.Calof@gov.bc.ca>

Subject: CBC North on Old Growth

Good morning David,

Just listened to an interview with Conservation North (Michelle Connally) and CBC's Carolina De Ryk discussing old growth around Prince George. A lot of mis-information and missing information in the interview. Hard to let that stand as the public record on the matter. I know responding to these things can just draw more attention to what is a legitimate challenge, however just wondering what your thoughts are on us responding?



Eamon O'Donoghue

Assistant Deputy Minister

Regional Operations – North Area

Phone (250) 847-7495

Cell (250) 877-1087

**Forests, Lands, Natural Resource Operations
and Rural Development**

(he/him/his)

FW: qathet Old Growth request for meeting

From: Diane.Nicholls@gov.bc.ca
To: Pike, Shannon FLNR:EX <Shannon.Pike@gov.bc.ca>, Muter, David FLNR:EX <David.Muter@gov.bc.ca>
Sent: March 22, 2021 3:07:07 PM PDT
Attachments: PR Lliving Jan 2021 Old Forests Freda Article.pdf, 2021-qathetOG GIS Analysis of OGSR deferral areas_REPORT_Mar 17th 2021.pdf
Over to you David for response

Diane Nicholls, RPF

Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: Janet May ^{s.22}
Sent: March 22, 2021 2:23 PM
To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>
Cc: Hegus John Hackett <john.hackett@tn-bc.ca>; wpauill@shishalh.com; Simons.MLA, Nicholas LASS:EX <Nicholas.Simons.MLA@leg.bc.ca>; pbrabazon@qathet.ca; dformosa@powellriver.ca; Johnsrude, Allan N FLNR:EX <Allan.Johnsrude@gov.bc.ca>; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>; Hamod, Wendy D FLNR:EX <wendy.hamod@gov.bc.ca>; Lefler, Derek FLNR:EX <Derek.Lefler@gov.bc.ca>
Subject: qathet Old Growth request for meeting

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

March 22, 2021

re: Request for meeting

Dear Minister Conroy,

I am writing on behalf of qathet Old Growth to endorse the Old Forest Strategic Review. i (the review). We request a meeting with you and your staff to present GIS analysis in support of implementing the report's recommendations in our region.

The premier's 2020 mandate letter to you as minister included this item:

"Implement the recommendations of the Old Growth Strategic Review in collaboration with Indigenous leaders, labour, industry, and environmental groups to protect more old-growth stands – in addition to the 353,000 hectares protected in September 2020."

It has been almost a year since the NDP government received the review, and we have not seen action by your Ministry to implement it in our region. Delaying action in this policy change gives logging companies both an incentive and time, to log stands of trees that might be removed from their tenure by the anticipated changes in forest policy. This has happened in the past.ii(FPB/SR/13) By delaying the implementation of these recommendations your government is accelerating the problem the report was meant to address.

The attached GIS analysis shows that most remaining old forests in the qathet Regional District (qRD) likely meet the criteria for being at risk of imminent and irreversible biodiversity loss. Old growth is down to less than 5% of forest cover in many of the forest ecosystems in our region, and less than 6% of our region's productive old forests remain. The qathet Regional District is one of the most heavily logged areas on the BC coast and we are looking for substantive action in enacting interim harvesting deferrals in our region.

We commend the NDP for promising to implement legislation in line with the 14 recommendations in the report. BC's future will be shaped by the policy change to managing forest for ecosystem health and biodiversity. We expect you to properly resource and direct the review recommendations. We look forward to meeting with you and your staff to properly present the attached report.

Yours Sincerely,

Janet May

Attached:

GIS Analysis of Forest Cover in the qathet Regional District (2021)

Mount Freda, Powell River Living (Jan 2021)

cc :

Hegus John Hackett, Tla'amin Nation, john.hackett@tn-bc.ca

hiwus Henry Warren Paull , shíshálh Nation, wpaul@shishalh.com

Nicholas Simons, MLA Powell River- Sunshine Coast Nicholas.Simons.MLA@leg.bc.ca

Patrick Brabazon, qathet Regional District, pbrabazon@qathet.ca

Mayor Dave Formosa, City of Powell River, dformosa@powellriver.ca

Diane Nicholls, Chief Forester, Resource Stewardship Division, Diane.Nicholls@gov.bc.ca

Allan Johnsrude, South Coast Natural Resource Region, Allan.Johnsrude@gov.bc.ca

Wendy Hamod, South Coast Natural Resource Region, wendy.hamod@gov.bc.ca

Derek Lefler, Sunshine Coast Natural Resource District Manager, Derek.Lefler@gov.bc.ca

i <https://engage.gov.bc.ca/app/uploads/sites/563/2020/09/STRATEGIC-REVIEW-20200430.pdf>

ii <https://www.bcfpb.ca/wp-content/uploads/2016/04/SR13.pdf>

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Our forestry practices must get better

BY JANET MAY
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Photos by Janet May

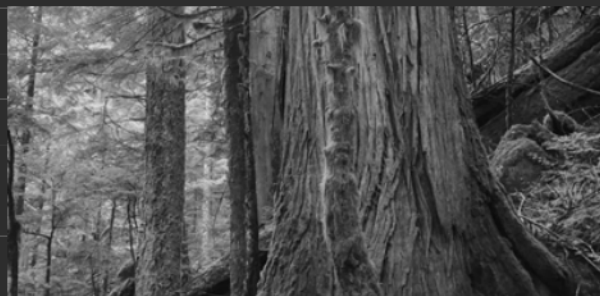
POWELL RIVER LIVING • January 2021 • 7

qathetOldGrowth.ca

**DRAFT
GIS ANALYSIS OF
FOREST COVER IN
qATHET REGIONAL DISTRICT**

In Relation to Criteria for Short-term Development Deferral
as Recommended by the
2020 Old Growth Strategic Review

March 17th, 2021



It's time to change the relationship we have with forests

GIS ANALYSIS OF FOREST COVER IN qATHET REGIONAL DISTRICT
In Relation to Criteria for Short-term Development Deferral
as Recommended by the
2020 Old Growth Strategic Review

INTRODUCTION

On April 30th, 2020, Al Gorley and Gary Merkel submitted the results of their independent strategic review of old growth forest management in British Columbia: *A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems*. As per the NDP's 2020 election promise, the Premier's mandate letter to Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations and Rural Development, instructs her to:

Implement the recommendations of the Old Growth Strategic Review in collaboration with Indigenous leaders, labour, industry, and environmental groups to protect more old-growth stands – in addition to the 353,000 hectares protected in September 2020.

Recommendation 6 of the Old Growth Strategic Review states that an immediate response to ecosystems at very high risk is required:

Until a new strategy is implemented, defer development in old forests where ecosystems are at very high and near-term risk of irreversible biodiversity loss. (p.55)

Specifically, the implementation advice for Recommendation 6 advises that old forests at highest risk of permanent biodiversity loss should be deferred from harvesting or other forms of disturbance (as soon as possible), until a system of new, more sustainable, and effective approaches to managing biodiversity and other old forest values is developed and implemented. The Review states that failure to act now could lead to the permanent loss of rare or unique ecosystem components contained in old and ancient forests.

The Strategic Review specifically advises that old forest areas meeting the following criteria (and possibly others) are at risk of near-term & irreversible biodiversity loss, and should be considered for short-term deferrals as soon as possible:

1. Any BEC variant with less than 10% old forest remaining today.
2. Old forest in any BEC – Landscape Unit combination that has less than 10% old forest today.
3. Ancient forests (e.g., forests >500 years on the coast).
4. Areas with a high potential to contribute towards larger ecosystem resilience.
5. Areas with a Site Index of >20m (i.e. productive sites able to grow large trees).

In an effort to understand what old forests within qathet Regional District (qRD) likely meet the above deferral criteria, in 2020 qathetOG undertook a preliminary (and conservative) GIS analysis of forest cover data from the 2019 Provincial Vegetation Resource Inventory (VRI). qathetOG is a group of concerned citizens living in the qRD with an interest in modernizing forest management toward sustainable second-growth harvests, fostering local value-added forestry economies, and balancing forest production with adequate protections for ecological, cultural and recreational forest values.

RESULTS

Figure 1 shows remaining old forest (age class 9 in the VRI, estimated to be >250yo) in the qathet Regional District, as a comparison to total forest cover. Our preliminary analysis shows that less than 22% of the forested landscape in the qRD remains as old forest (**Table 1**). When old forest in the comparatively unproductive subalpine Mountain Hemlock (MH) BEC zone is removed from the calculations, there is only ~15% old forest remaining. This remaining 15% is largely isolated to steep valley sides in the remotest northern drainages of the qRD. Little remains on the valley bottoms and in lower elevation forests close to the coast (less than 5%).

Remaining old forest in the qRD is compared by BEC unit¹ in **Table 1**. Historically, approximate expected percentages of old forest in each BEC unit would be: CDFmm 40% (Price et al. 2020), CWHxm, dm, ms 70%, CWHds 60%, CWHvm 85-90%, and MHmm 90-95% (MOE 2020). Remaining percentages of old growth in all BEC units in the qRD are far below the amounts of old growth that would be expected based on historic disturbance regimes.

Table 1. Remaining old forest (age class 9) in the qRD by BEC unit, with historic old growth percentages and risk thresholds indicated (data source: 2019 VRI).

BEC UNIT	TOTAL FOREST (Ha)	TOTAL OLD GROWTH (Ha)	CURRENT % OLD GROWTH	HISTORIC % OLD GROWTH ² (hOG)	Low Risk (>70% hOG)	High Risk (<30% hOG)
CDF						
mm	22289.8	1080.5	4.8	40	>28	<12
CWH						
xm	34862.7	865.3	2.5	70	>49	<21
dm	82755.1	2850.8	3.4	70	>49	<21
ds	5592.5	1531.3	27.4	60	>42	<18
ms	9216.6	5662.2	61.4	70	>49	<21
vm	84847.0	23966.4	28.2	85-90	>61	<26
MH						
mm	46774.2	26905.6	57.5	90-95	>65	<28
TOTALS	286338.0	62862.1	22.0	-	-	-

Deferral Criteria 1

Figure 2 highlights areas of qRD old forest remaining within the CDFmm, CWHxm and CWHdm BEC units. These forests meet **deferral criteria #1** in the Old Growth Strategic Review, as there is less than 10% old growth remaining in these BEC units province-wide. The situation for these ecosystems is particularly precarious in the qRD, where there is less than 5% old growth remaining in the CDF, and only 2.5% and 3.4% in the CWHxm and CWHdm, respectively (**Table 1**). According to

¹ The Biogeoclimatic Ecosystem Classification (BEC) delineates ecological zones (biogeoclimatic units) by vegetation, soils, and climate, and is more commonly used in forestry and conservation. It also classifies ecosystems, within the ecological zones, based on the potential of the site at climax or mature successional stages. For descriptions of the different BEC units referred to in this report see:

<https://www.for.gov.bc.ca/hre/becweb/resources/classificationreports/subzones/index.html>

² Based on figures from the Provincial Cumulative Effects Framework, as cited in *Standards for Assessing the Condition of Forest Biodiversity under British Columbia's Cumulative Effects Framework* (MOE 2020). The CDF figure is sourced from *Last Stand for Biodiversity* (Price et al. 2020).

Gorley & Merkel (2020), if 70% or more of the natural abundance of forest with old trees is retained, the risk of species loss, compromised ecosystem services, and losing ecosystem resilience is *low*. If less than 30% is retained the risk is *high*. Between 30% and 70%, the risk *varies* by ecosystem. The relative risk thresholds as they pertain to BEC units in the qRD are outlined in **Table 1**.

Deferral Criteria 2

The Strategic Review also states that old forest distribution and spatial considerations are crucial in managing for effective ecosystem health. **Table 2** shows percentages old forest calculated for each BEC - Landscape Unit combination in the qRD. There are three BEC-LU combinations where the BEC unit doesn't meet criteria 1, but which have less 10% old forest remaining in that particular landscape unit. These include: old forests within the CWHvm and MHmm of the Haslam Landscape Unit, and old forests within the CWHvm of the Lois Landscape Unit. These forests meet **deferral criteria #2** in the Old Growth Strategic Review; their locations are highlighted in **Figure 3**.

Deferral Criteria 5

Site index is an indicator of site productivity described by the height that a stand of trees reaches in a given time. High productivity sites (Site Index >20) have the potential to grow very large trees. Sites with the potential to grow very large trees cover less than 3% of the province (Price et al. 2020). These types of forests match most people's vision of old growth, that being old forest with large trees. Old forests on these sites have dwindled considerably due to intense harvest. Almost all productive forests in the qRD have been logged; only 5.3% of high productivity forest is currently old (compared to 6% for the coast generally). According to Price et al. (2020), these ecosystems are effectively the white rhino of old growth forests. They are almost extinguished and will not recover from logging. **Figure 4** shows the locations of remaining high productivity old forests³ in the qRD (site index > 20).

Deferral Criteria 1,2 & 5

Figure 5 shows combined old forest in qRD which meet the Strategic Review's deferral criteria 1,2 & 5. Old forests that do not meet these criteria are likely to meet criteria 3 and 4 as per the discussion below.

Deferral Criteria 3 & 4

The Strategic Review's **deferral criteria #3** is ancient forest, which on the coast is categorized as forest greater than 500 years old. However, age class (and age within the BC government forest cover data) does not allow for ancient forests (>500 yo) to be distinguished from old forests (>250 yo). On the coast, some forests are many thousands of years old (Price et al. 2020). According to the Strategic Review, these forests have ancient genetic material and are repositories of biota and processes we may not even know or understand. This makes them an extremely important buffer against species extinction, climate change, and lost future opportunities. These "ancient forests" are globally unique, rare, and contain species as yet undiscovered, and many of these ecosystems and old forests are non-renewable within any reasonable time frame. Many of these irreplaceable forests are in the timber harvesting land base and are subject to logging,

³ Very few high productivity old forest are designated as Old Growth Management Areas (OGMAs) in QRD; there is generally a preference for retaining lower productivity old forest (with smaller trees) in OGMAs.

In qRD most of the remaining old forest is in the subalpine Mountain Hemlock (MH) BEC zone (**Table 1**), or in higher reaches of the CWHvm. At higher elevations, particularly in the MH zone, trees are slow growing and small for their age. Hence, they are often many hundreds of years old before reaching a harvestable size. Tree ring counts on a selection of stumps in a recent WFP cutblock in the MH zone of Mount Freda (in the qRD) found several trees between 800 and 1200 years old (see article in *Powell River Living* magazine⁴). The VRI assigned age for the stand was 351 years, illustrating the limitations of using existing provincial forest cover data to identify ancient forest attributes.

In addition to old forests meeting criteria 1, 2 & 5, **Figure 6** highlights forests which have been assigned ages over 300 years by the VRI. Because most of these forests are at higher elevations where there are infrequent natural disturbances, there is a very good probability that they are actually ancient (>500 yo), and therefore likely to meet **deferral criteria #3**.

With the inclusion of forests likely to meet deferral criteria #3, there are few old forests remaining in qRD that are not at risk of near-term & irreversible biodiversity loss, as shown in **Figure 6**. For the remaining old forests that do not meet the above criteria, there is a reasonable likelihood that many will meet **deferral criteria #4**: old forest areas with a high potential to contribute towards larger ecosystem resilience. An analysis of forests within qRD meeting deferral criteria #4 was beyond the scope of this report.

OGMAs, WHAs & Tenure

Within the qRD, a small portion of remaining old forests is afforded some level of temporary protection by Old Growth Management Areas (OGMAs) and Wildlife Habitat Areas (WHAs). These are shown in **Figure 7**. For reference purposes, tenure is shown in **Figure 8**.

CONCLUSION

This preliminary analysis of the 2019 VRI data (recognizing that the data has limitations, and is not always accurate or up to date) indicates that most remaining old forests in the qRD likely meet the Old Growth Strategic Review criteria for being at risk of imminent and irreversible biodiversity loss, and qualify for short-term deferral from forestry development while new approaches to managing biodiversity and other old forest values are developed. This report is indicative only, and is not intended as a substitute for rigorous professional analysis, verified on the ground by recognized experts.

Next Steps:

In order to prevent irreversible biodiversity losses, the Old Growth Strategic Review advises that its recommendation for interim deferrals (Recommendation #6) be acted on as quickly as possible. Upon identifying and verifying very high-risk old forests that meet the short-term deferral criteria, the Review outlines the following next steps:

1. Determine which of the high risk old forests are subject to harvesting or other significant disturbances within the next two years (FLNRORD staff and licensees should have this information).
2. Use various mechanisms to enact interim deferrals, such as:

⁴ *Millennia-old cedars felled on Mount Freda* (May 2021)

<https://static1.squarespace.com/static/5ed44807709a614ffb3c1699/t/6055561e0af9103c1f5ce2a5/1616205343182/PR+Living+Jan+2021++Old+Forests+Freda+Article.pdf>

- a. Instruct BCTS to cease development and defer selling timber in old growth areas;
 - b. Request authorized tenure holders to voluntarily defer development;
 - c. Decline to authorize new permits or licences in deferral areas; and
 - d. If necessary, establish regulatory provisions and incentives to enable deferrals.
3. Carry out an economic impact analysis of deferrals.
4. Establish a fair and equitable process to mitigate economic impacts to holders of small area-based timber tenures (e.g., replacement area or compensation).
5. Provide a public progress report on how these priority areas have been addressed at the end of the first year after this report.
6. After two years, confirm which temporary deferral areas will be subject to protection or further management measures.
 - a. For each identified area, determine whether biodiversity conservation requires full exclusion from development or special management.
 - b. Establish legal protection for areas confirmed to be critical for biodiversity conservation.

REFERENCES:

Gorley, A. and G. Merkel (2020). *A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems*. Report prepared for the Minister of Environment.

MOE (2020). *Standards for Assessing the Condition of Forest Biodiversity under British Columbia's Cumulative Effects Framework*. Provincial Forest Biodiversity Technical Working Group.

Price, K., R.F. Holt and D. Daust (2020). *BC's Old Growth Forest: A Last Stand for Biodiversity*.

Table 2. Percentages old forest calculated for each BEC - Landscape Unit combination in qRD, with combinations meeting deferral criteria 1 & 2 indicated. The risk rating, as per Table 1, for each BEC-Landscape Unit combination is indicated by colour coding: red = high risk, green = low risk, yellow = variable risk.

BEC-LU COMBO	TOTAL FOREST (ha)	AGE CLASS 9 (ha)	% OG	Meets Deferral Criteria 1	Meets Deferral Criteria 2
Brittain	33860.0	6803.2	20.1		
CWH	25425.0	3821.6	15.0		
dm	11175.0	501.9	4.5	Y	Y
vm	14250.0	3319.7	23.3		
MH	8435.0	2981.6	35.3		
mm	8435.0	2981.6	35.3		
Bunster	38467.8	4391.0	11.4		
CDF	2084.1		0.0		
mm	2084.1		0.0	Y	Y
CWH	33186.3	3045.7	9.2		
dm	13723.3	386.4	2.8	Y	Y
vm	8064.0	2358.4	29.2		
xm	11399.0	300.9	2.6	Y	Y
MH	3197.5	1345.3	42.1		
mm	3197.5	1345.3	42.1		
Haslam	18603.6	232.3	1.2		
CDF	1137.1		0.0		
mm	1137.1		0.0	Y	Y
CWH	17158.5	204.3	1.2		
dm	9842.6	110.6	1.1	Y	Y
vm	2704.4	93.7	3.5		Y
xm	4611.5		0.0	Y	Y
MH	308.0	28.0	9.1		
mm	308.0	28.0	9.1		Y
Homfray	26323.3	9427.2	35.8		
CWH	19229.9	4096.4	21.3		
dm	7987.8	625.4	7.8	Y	Y
vm	10343.1	3463.3	33.5		
xm	898.9	7.7	0.9	Y	Y
MH	7093.5	5330.8	75.2		
mm	7093.5	5330.8	75.2		
Powell Daniels	12175.6	5464.4	44.9		
CWH	10597.3	4051.7	38.2		
dm	763.3	36.6	4.8	Y	Y
vm	9834.0	4015.2	40.8		
MH	1578.3	1412.7	89.5		
mm	1578.3	1412.7	89.5		
Powell Lake	26457.5	3914.2	14.8		

BEC-LU COMBO	TOTAL FOREST (ha)	AGE CLASS 9 (ha)	% OG	Meets Deferral Criteria 1	Meets Deferral Criteria 2
CWH	21763.5	1660.2	7.6		
dm	9618.1	18.3	0.2	Y	Y
vm	12145.4	1641.8	13.5		
MH	4694.0	2254.0	48.0		
mm	4694.0	2254.0	48.0		
Skwawka	11943.1	5869.1	49.1		
CWH	9178.0	3619.6	39.4		
dm	703.5	33.3	4.7	Y	Y
vm	8474.5	3586.3	42.3		
MH	2765.1	2249.4	81.4		
mm	2765.1	2249.4	81.4		
Texada	37090.8	1647.5	4.4		
CDF	19068.7	1080.5	5.7		
mm	19068.7	1080.5	5.7	Y	Y
CWH	18022.1	567.0	3.1		
dm	1696.3	20.5	1.2	Y	Y
xm	16325.8	546.5	3.3	Y	Y
Toba	39943.0	22476.9	56.3		
CWH	27780.4	12941.6	46.6		
dm	5022.9	903.9	18.0	Y	
ds	5592.5	1531.3	27.4		
ms	9216.6	5662.2	61.4		
vm	7948.3	4844.2	60.9		
MH	12162.6	9535.3	78.4		
mm	12162.6	9535.3	78.4		
Lois	41473.2	2636.3	6.4		
CWH	34933	868	2		
dm	22222.3	213.9	1.0	Y	Y
vm2	11083.1	643.8	5.8		Y
xm1	1627.5	10.1	0.6	Y	Y
MH	6540.2	1768.4	27.0		
mm	6540.2	1768.4	27.0		
GRAND TOTALS	286338.0	62862.1	22.0		

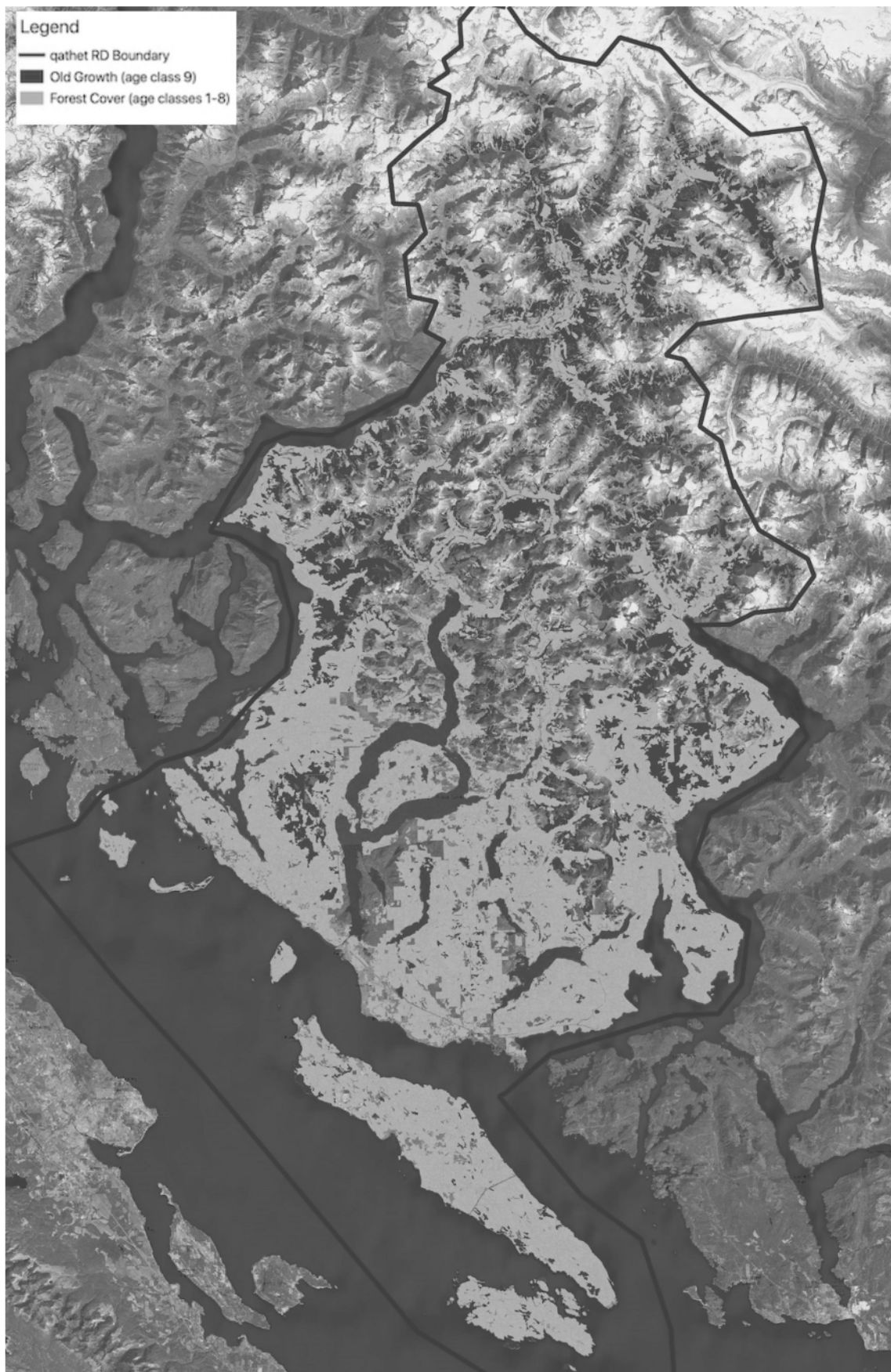


Figure 1. Forest cover in qathet regional district, with remaining old growth forest (age class 9, >250yo) indicated in dark green (data source: BC VRI 2019).

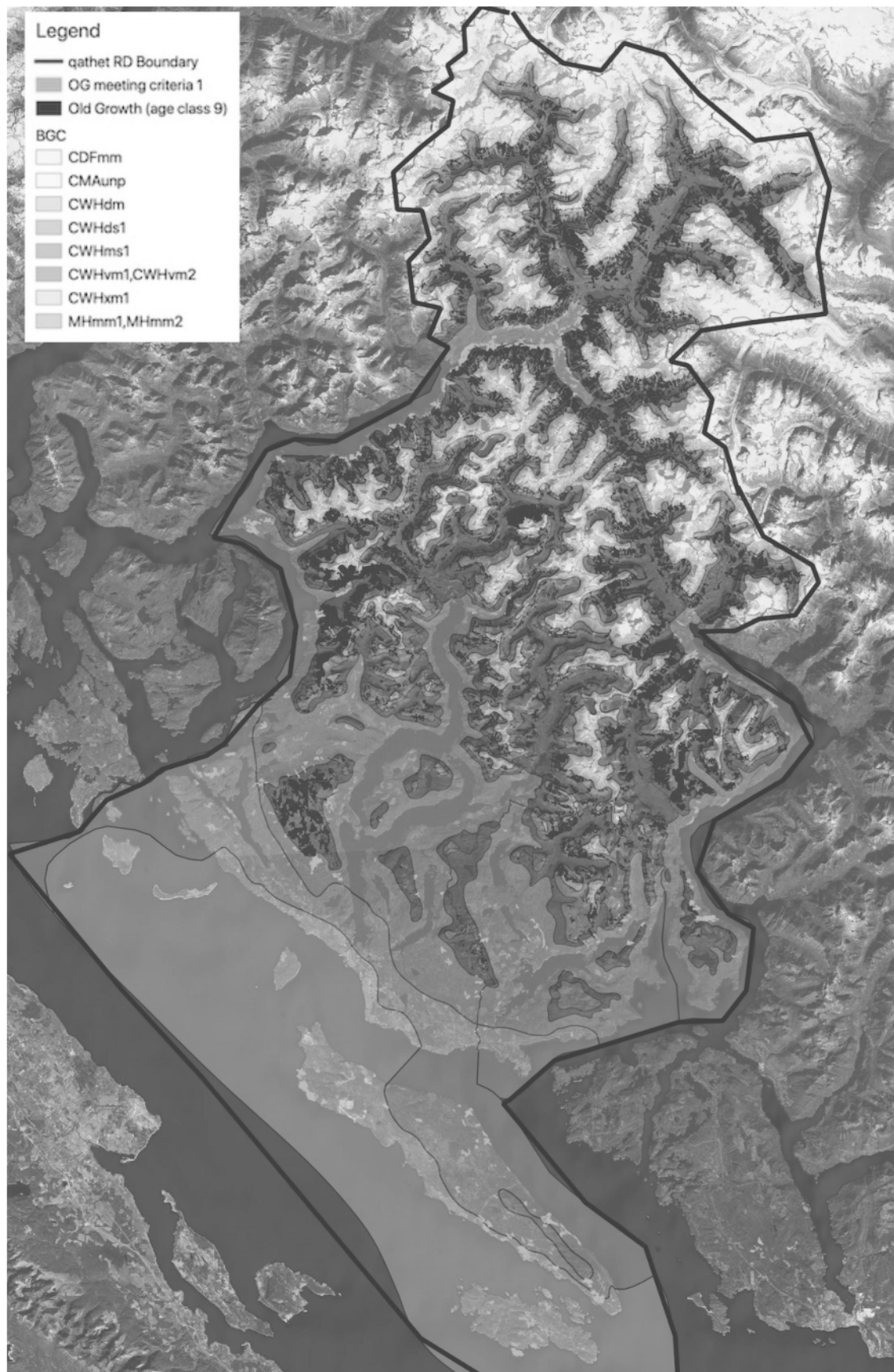


Figure 2. Forest cover in qathet Regional District. Remaining old growth forest (age class 9, >250yo) indicated in dark green, with old forest meeting **deferral criteria #1** (any BEC variant with less than 10% old forest remaining) highlighted in turquoise (data source: BC VRI 2019).

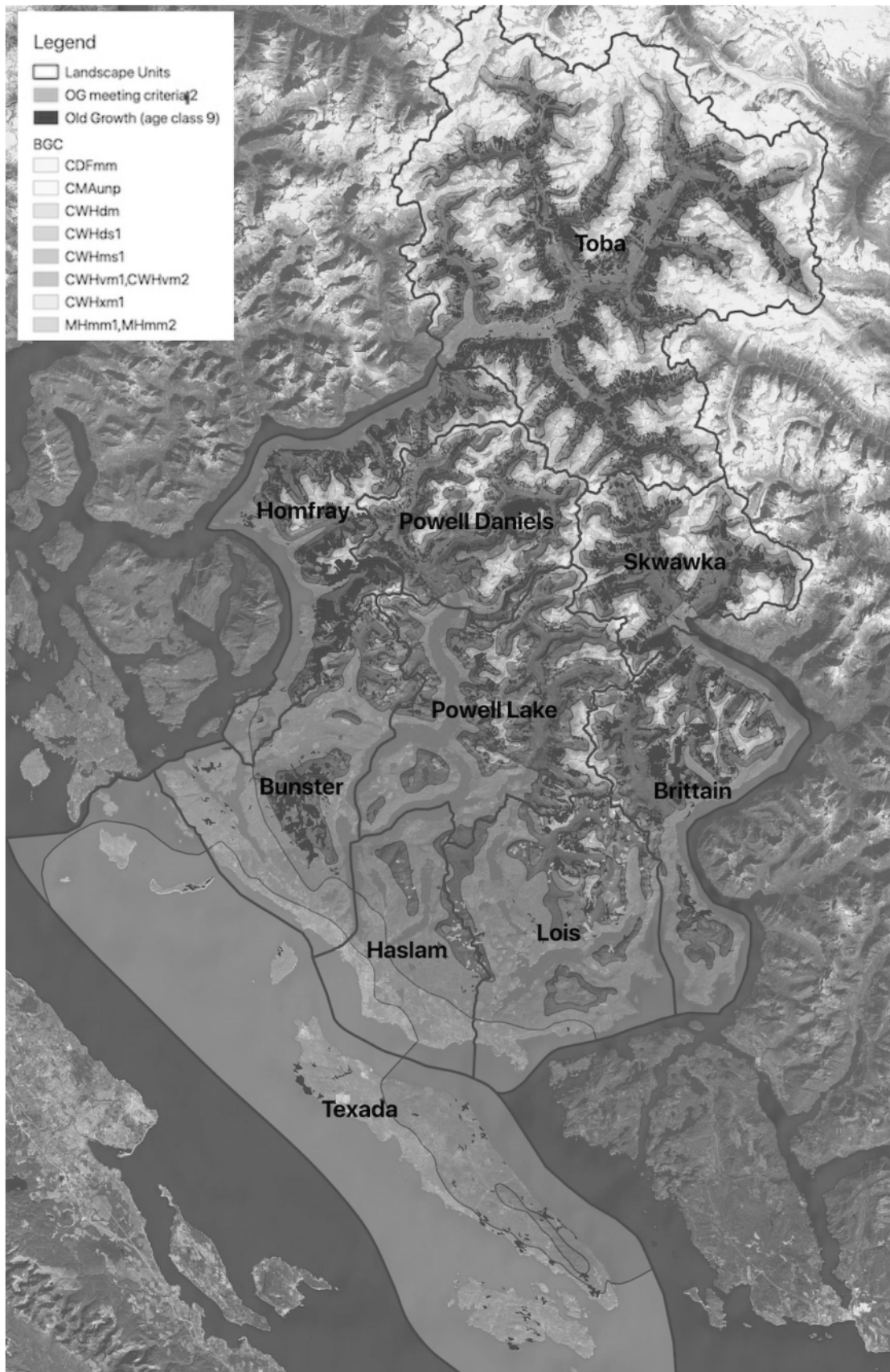


Figure 3. BEC zones and landscape units for qathet Regional District. Remaining old growth forest (age class 9, >250yo) indicated in dark green, with old forest meeting **deferral criteria #2** (old forest in any BEC-landscape Unit combination that has less than 10% old forest) highlighted in turquoise (data source: BC VRI 2019).



Figure 4. Forests (not old) with Site Index >20 in qathet regional district (orange). Old forests (age class 9, >250yo) meeting deferral **criteria #5** (old forests with Site Index of>20) highlighted in turquoise (data source: BC VRI 2019).

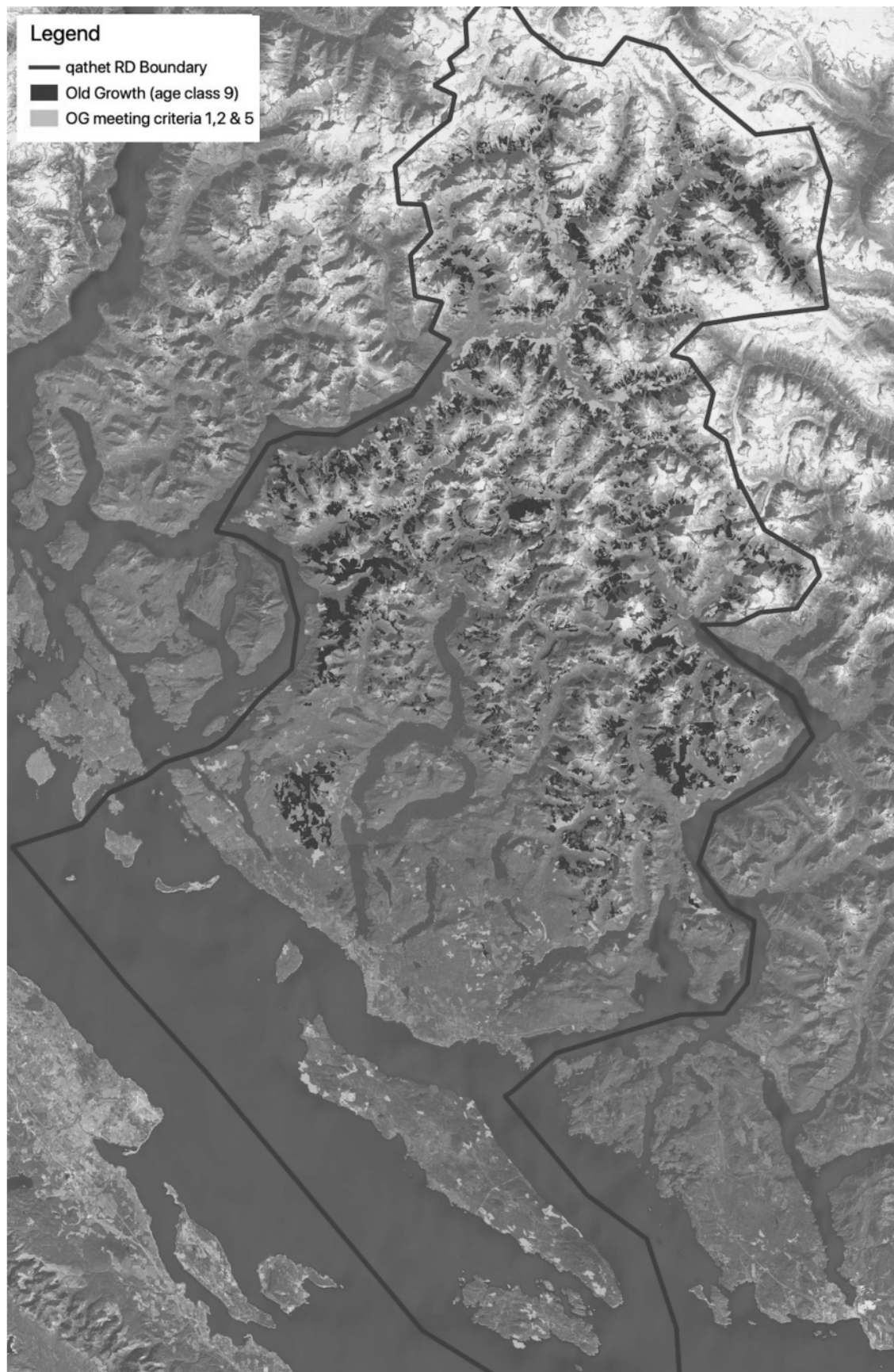


Figure 5. Remaining old growth forest (age class 9, >250yo) in qathet Regional District, indicated in dark green, with old forest meeting **deferral criteria #1, 2 & 5** highlighted in turquoise (data source: BC VRI 2019).

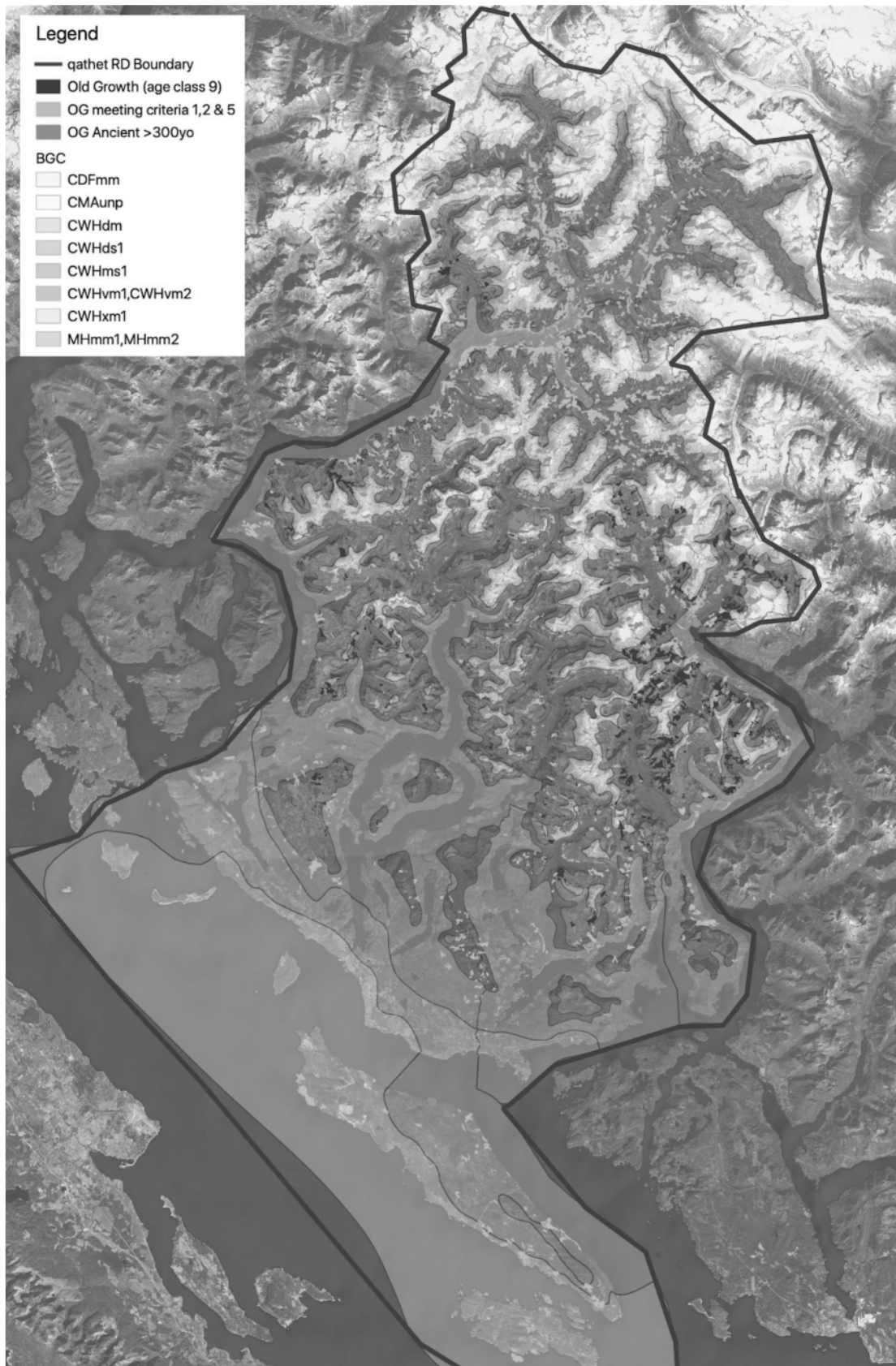


Figure 6. Old forest (age class 9, >250yo) in qathet Regional District meeting **deferral criteria #1, 2 & 5**, highlighted in bright turquoise. Additional old forests >300 years old and therefore likely meeting **deferral criteria #3** (ancient forests, > 500 yo) highlighted in dark turquoise. Remaining old forests that fall outside the above criteria are indicated in dark green – there is a reasonable likelihood these forests would meet **deferral criteria 4** in an extended analysis (data source: BC VRI 2019).

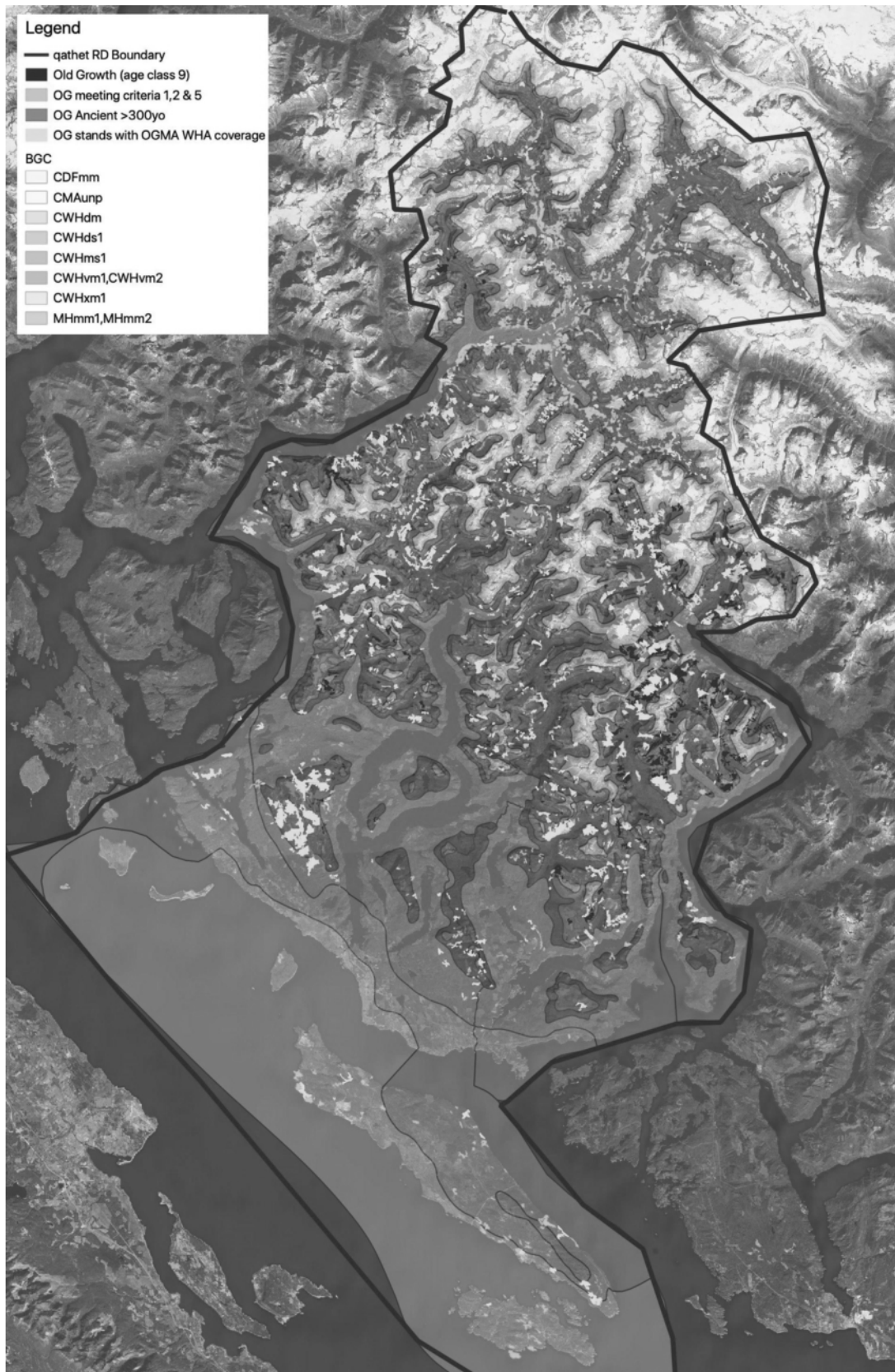


Figure 7. Old forest stands in qathet Regional District falling wholly or partly within OGMAs and/or WHAs, indicated in yellow. Old forests (age class 9, >250yo) meeting **deferral criteria #1, 2 & 5**, highlighted in bright turquoise. Old forests likely meeting **deferral criteria #3** highlighted in dark turquoise (data source: BC VRI 2019).

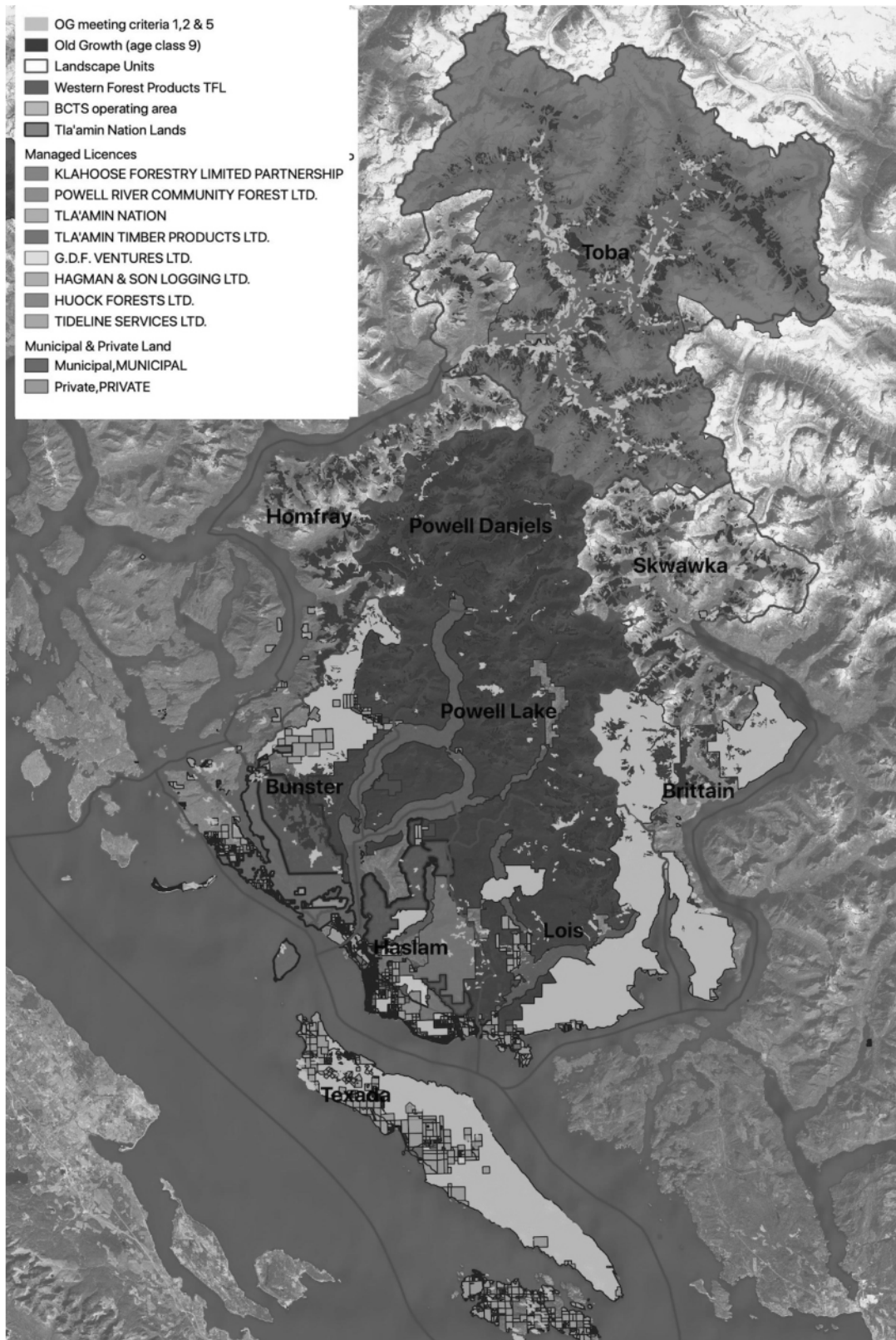


Figure 8. Tenure in qathet Regional District. Remaining old growth forest (age class 9, >250yo) indicated in dark green, with old forest meeting **deferral criteria #1, 2 & 5** highlighted in turquoise (data source: BC VRI 2019).

19 April 2021

Glen Buhr, Stewardship Officer and/or
Jennifer Plummer, Stewardship Forester
Skeena Stikine Natural Resource District
Ministry of Forests, Lands and Natural Resource Operations and Rural Development
Bag 600
Smithers, BC V0J 2N0

re: Additional information required in order to provide meaningful comment on the Kispiox
TSA Timber Supply Review Data Package (February 2021)

Dear Glen Buhr and/or Jennifer Plummer,

The purpose of this letter is to (a) request information required for the meaningful review of the Kispiox TSA TSR Data Package (February 2021), herein “the Data Package”, and (b) to request an extension to the public comment period in order for critical information to be obtained from the Province and reviewed by Qualified Resource Professionals (QRPs) as well as the public.

There are two categories of information being requested at this time. Category (i) information relates to the due date for comments on the Data Package. Category (ii) information relates to technical data and assumptions underlying the Timber Supply Review Data Package and associated modelling parameters; this information is required in order to carry out a professional review of the Data Package and provide meaningful comments. At this time information listed below under Categories (i) and (ii) is being requested from the Province and a subsequent extension to the public consultation period regarding the Data Package is being proposed in order to allow time for meaningful review and comment regarding the material. The revised due date for public comment regarding the Data Package is proposed as 30 June 2021; this additional time will allow for the requested information to be produced by the Province and reviewed by the public and QRPs.

AAC determinations have far reaching ecological, social, and economic consequences over the ten-to-fifteen-year life of the decision. The gravity of the TSR and AAC determination for the Kispiox TSA warrants a fully transparent public review and comment process that is rooted in sound quantitative data available to stakeholders and Provincial decision makers alike. The deadline for release of the Data Package was delayed by the Province for three years for reasons yet unknown to the public. This call for additional information and an extension to the due date for comments is being requested because it is in the Public Interest; the information requested must be supplied and the deadline for comments extended in order to allow for a transparent meaningful public and professional review. This request for information and a subsequent extension to the comment period is reasonable and should not be dismissed.

Category (i) Information Request:

A link to the Data Package was released for stakeholder consultation on 08 March 2021. The 08 March email noted in two places that comments pertaining to the Data Package will be accepted until 07 May 2021. Section 13, Page 119 of the Data Package states that comments will be accepted until 26 April 2021. As noted above, an extension to the due date (to 30 June

2021) is being requested in order to allow time for required information (Category ii) to be obtained from the Province and reviewed by Qualified Resource Professionals and the public. At your earliest convenience please confirm the deadline for submission of comments relating to the Data Package.

Category (ii) Information Request:

Initial review of the Data Package yielded a number of questions and requirements for additional information underlying assumptions and modelling parameters within the TSR process. In addition to information gaps, there are also typos and table labeling errors that make effective review of the document challenging. Review of the Data Package by elders and other members of the public is greatly impeded by the typos and other mistakes, as numbers and specific language are crucial to the interpretation of the document. The following information is required:

1. Data Package Section 2.3 Forest Industry [Wood Volume Harvested] [line 7] The Data Package states, *"A limited amount of volume was also sent to export."*
 - The Province is asked to report the total volume sent for export between 2008 and 2020 by year.
2. Data Package Section 4.2 Climate change [lines 28 through 30] The Data Package states, *"Historical climate and future climate projection data, as well as recommendations from district and regional experts to mitigate impacts of climate change will be presented to the chief forester at the time of the determination."*
 - The Province is asked to provide the public with complete records of the information regarding historic climate data, climate projections, and any recommendations regarding mitigation of future impacts relating to climate change that will be presented to the Chief Forester for the purposes of the AAC determination.
 - In the context of a global climate crisis and biodiversity collapse, it is crucial for the Province to be transparent with the public regarding assumptions and modelling around climate change as it relates to determining sustainable levels of timber harvest. This detailed and specific information is required in order for QRP's and the public to provide meaningful review and comment on the Data Package.
3. Data Package Section 4.3 Cumulative effects [lines 7 through 9] The Data Package states, *"Currently, CEF has assessment protocols for aquatic ecosystems, grizzly bear, and old growth forests that are approved for implementation. Indicators under these protocols relevant to the Kispiox TSA will be completed prior to the AAC determination and will be presented to the chief forester."*
 - The Province is asked to provide the public with complete records of the information regarding Cumulative Effects Assessment for all assessed values in the Kispiox TSA with associated indicators and thresholds/targets. Quantitative data and modelling parameter details relating to indicators and associated thresholds for all values assessed under the Cumulative Effects Framework (CEF) for the Kispiox TSA are required in order for professionals and the public to meaningfully review the Data Package as part of the consultation process for Stage 1 of the TSR.

- In accordance with the above comment regarding climate change, the assessment and management of cumulative impacts/effects of multiple activities on the landbase is critical for the preservation of biological diversity, ecosystem resilience, and the overall sustainability of natural resource management regimes. The public cannot provide meaningful comments to the Data Package in the absence of critical information such as the cumulative effects values and associated indicators and thresholds/targets being considered under the Kispiox TSR.
4. Data Package Section 4.3 Cumulative effects [lines 10 through 12] The Data Package states, *"Guided by the procedures outlined in Appendix 4, sensitivity analyses (ID#11) will be used quantify the degree to which uncertainty associated with cumulative effects. This analysis will be refined as the analysis is conducted."*
 - For the purposes of public consultation regarding the Data Package, the Province is asked to provide the public with complete records of the detailed qualitative and quantitative information regarding Cumulative Effects Assessment for all assessed values in the Kispiox TSA with associated indicators and thresholds/targets. Table 58 on page 98 of the Data Package lists the Sensitivity Analyses that will be conducted as part of the TSR. Sensitivity Analysis #11 is dedicated to the issue of cumulative effects. The stated 'Sensitivity Levels' are, "Investigate analysis guided by Appendix 4." Appendix 4 is titled, 'Analyzing wildlife values in the Gitanyow and Gitxsan First Nation traditional territory'. The level of detail set out in Appendix 4 is insufficient for the purposes of public consultation on the management of cumulative effects in the Kispiox TSA. The list of values in Appendix 4 does not include critical values such as forest carbon stewardship and others that must be accounted for under a credible comprehensive cumulative effects assessment. The information provided in Appendix 4 is insufficient in order to meet the requirements of consultation regarding cumulative effects.
 5. Data Package Section 4.4 Major forest management considerations and issues [Table 1, Consideration: First Nations Interests] The Data Package states, *"First Nations values of interest include moose, grizzly bear, goshawk, mountain goat, fish and fish habitat, and marten. Other land-based interests have been identified via First Nations-initiated strategic land-use planning. Sensitivity analyses will be employed to: (i) assess long-term stability of habitats for identified species relative to base case and alternative timber harvest forecasts; and to, (ii) assess timber supply implications of broadly adopting non-legal objectives from First Nations strategic plans."*
 - The province is asked to provide a complete list of First Nations values of interest that are being managed for in the Kispiox TSA. Cultural Heritage values, and medicinal plant values are examples of omissions to the list cited in the Data Package
 6. Data Package Section 4.4 Major forest management considerations and issues [Table 1, Consideration: Natural disturbance: insects, disease, wildfire, and climate change] The Data Package states, *"Forest health agents of note include Dothistroma needle blight, Tomentosus root disease, spruce and western balsam bark beetle, and drought. Wildfires are historically infrequent, but several of moderate size occurred in 2018."*

Mid-range climate change projections for this unit are for shorter and warmer winters and hotter summers, combining to increase the drought potential and fire hazard. Non-recoverable loss (NRL) estimates and operational adjustment factor assumptions have been revisited and refined for this analysis.”

- The Province is asked to provide detailed information regarding modelling assumptions and parameters relating to Non-recoverable loss (NRL) estimates and operational adjustment factor(s) under the Base Case and applicable Sensitivity Analyses for this TSR. In order for the public and reviewing professionals to assess the Data Package and provide meaningful input, detailed information regarding forest health considerations, NRL estimates, and operational adjustment factor(s) is required. The information provided in sections 7.5.4 (page 87), and 8.3.4 (page 95) on NRLs and OAFs respectively, is insufficient for the purposes of consultation.
7. Data Package Section 4.4.1 Chief forester’s implementation recommendations from TSR3 (2008) [Table 2, Implementation recommendation 2. Site Productivity] The Data Package states, *“In areas where no PEM/TEM data that meets the provincial standard are available - as is the case for Kispiox TSA - site index estimates are provided by a biophysical model employing variables of BEC zone, slope, aspect, elevation, and climate.”*
- The Province is asked to provide detailed information regarding modelling assumptions and parameters relating to the biophysical model used to generate site index, referred to in the quote above. In order for the public and reviewing professionals to assess the Data Package and provide meaningful input to this impactful TSR process, detailed information underlying the biophysical model used to predict site index is required. Again, the need for this information in order to enable a meaningful public review of the TSR Data Package is emphasized.
8. Data Package Section 4.4.1 Chief forester’s implementation recommendations from TSR3 (2008) [Table 2, Implementation recommendation 7. Patch size distribution for landscape-level biodiversity objectives] The Data Package states, *“The chief forester’s direction from the previous AAC decision was to use or develop a timber supply model that permits the incorporation of legal patch-size distribution targets for landscape unit / NDT combinations. The Spatial Timber Supply Model (STSM) will be used to complete this analysis. Within the model parameters for patch-size distribution will be applied and reported.”*
- The Province is asked to provide details of all modelling assumptions and parameters as used in The Spatial Timber Supply Model (STSM), including parameters for patch-size distribution for the purposes of meaningful consultation with the public regarding the Kispiox TSR and subsequent AAC determination.
9. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Inoperable Areas (inaccessible, uneconomic, remote)]
- The Province is asked to provide detailed definitions of the three terms: inaccessible, uneconomic, and remote and what specific parameters are used to

define and model each of these three constraints under the Base Case and Sensitivity Analyses;

- The Province is asked to provide spatial files associated with defining and modelling inoperable areas, including the GIS modelling results of the Harvest Method Mapping (HMM) operability project for the Kispiox TSA;
- The Province is further asked to explain the difference between the 861,308 ha that have been classified as 'Inoperable' and the 367,905 ha that are listed in the 'Net area excluded (ha)' field (page 27);
- The Province is asked to clearly state the methodology for assignment of harvest method and stand quality parameters under the HMM operability project for the Kispiox TSA. Under Section 6.8 Inoperable areas, Economically Inoperable Areas lines 8 & 9, the aforementioned task is referred to as, "... subjective in nature but represented the considerable cumulative experience and knowledge of licensee and government agency participants to the project."
- The Province is asked to provide the quantitative parameters used for the *Harvest Method x Stand Quality* analysis (referred to under Data Package Section 6.8 Inoperable areas page 34 line 12);
- The Province is asked to provide the detailed description of all codes associated with the column called 'RATNLE' in Table 13. Codes requiring further details are: S1 through S7, M1 through M5, P1 through P3, D1, L1 through L3, and T1 through T2;
- Please clarify for the purposes of this public consultation, what is the status of the 493,403 ha difference between the two values with respect to inclusion in the THLB (page 27 of the Data Package)? Will 367,905 ha be removed from the THLB for the purposes of the Base Case under this TSR?

10. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Terrain Stability and Environmentally Sensitive Areas (ESAs) and Section 6.9 Terrain stability and environmentally sensitive areas (ESA), Moderately unstable soils, lines 6 through 8]

- The Province is asked to provide the details and spatial files associated with the GIS-based soil erosion potential mapping project.

11. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Sites with low timber growing potential]

- Section 6.10 Sites with low timber growing potential, page 42, line 6 refers to criteria listed in a table but does not include a table number. The Province is asked to edit the Data Package to clearly indicate the correct table numbers throughout (there are multiple examples of mis-labeled and/or mis-referenced tables throughout the Data Package);
- The Province is asked to provide spatial files associated with the HMM Harvest Method and Stand Quality project along with methodology/assumptions information requested above;
- The Province is requested to clarify if the 268,173 ha of area designated as having low timber growing potential is excluded from the THLB (page 27 of the Data Package)? Table 4 is confusing in this regard, as the 'Net area excluded (ha)' reads 1 ha for 'Sites with low timber growing potential';

- Section 6.5 Table 7 notes details of non-forest and non-productive forest, and it is unclear how or if these criteria relate to the designation of 'Sites with low timber growing potential' under the HMM project to arrive at the netdown factor. The Province is asked to clarify how/if the terms non-forest and non-productive forest relate to the designation of 'Sites with low timber growing potential'.
12. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Existing Wildlife Tree Patches]
 - The Province is asked to clarify, why all 10,979 ha (page 27 of the Data Package) of the designated areas are not being removed from the THLB on an area basis given that licensee FSPs commit to not harvesting existing Wildlife Tree Retention Areas (WTRAs)?
 13. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Other Geographically Defined Exclusions]
 - The Province is asked to clarify all criteria used to define 'Other Geographically Defined Exclusions' and to provide spatial files associated with this constraint category. The data contained under Section 6.20 of the Data Package is insufficient for the purposes of consultation. The Province is asked to clarify the rationale for why the specified area (4,951 ha) of the total area under this designation (167,705 ha) will be removed from the THLB (page 27 of the Data Package)?
 14. Data Package Section 6.1 Land Base Definition [Table 4. Netdown table to identify crown forest management land base (CFMLB) and timber harvesting land base (THLB) for the Kispiox TSA, Netdown factor: Cultural Heritage Resources]
 - 1,636 ha of the total area under this designation (4,146 ha) will be removed from the THLB according to Table 4 on page 27 of the Data Package. The Province is asked to provide documentation from Indigenous groups with claims in the Kispiox TSA that support the asserted figures of 4,146 ha of area relating to Cultural Heritage Resources, with the associated portion of 1,636 ha being reserved for protection. The Province is asked to demonstrate that adequate consultation with Indigenous groups has been carried out, such that modelled estimates of area subject to constraint by CHR values are accurately reflecting the spatial extent of CHR values likely to warrant protection on the landbase.
 15. Data Package Section 6.6 Roads, trails, landings and linear corridors [Future Roads, Trails and Landings]
 - Line 3 under this paragraph refers to, "*The Table 6 figure – 4.4% - represents the weighted average...*". There appears to be a mistake in the quoted sentence, as Table 6 of the Data Package relates to 'Tenures not managed within the TSA AAC calculation for the Kispiox TSA'. The mislabeling of Tables and Figures is confusing and there are a number of examples of this in the Data Package. The Province is asked to correct these mistakes and redistribute the Data Package prior to commencing a formal public consultation process for the Kispiox TSR.

16. Data Package Section 6.17 Riparian reserve and riparian management zones [Data source and comments, bullet 3, page 52] The Data Package states, *“Current Forest Stewardship Plans specify increased levels of retention for smaller streams (S4, S5, S6 class) that have an alluvial substrate, or flow into fish-bearing waters, or are within watersheds identified as having significantly high historical levels of natural or human-caused riparian disturbance.”*
- The Province is asked to provide details of assumptions and quantitative data underlying modelling for increased levels of retention on smaller streams (noted on page 52 of the Data Package), as committed to in approved FSPs. The aforementioned data is requested for the Base Case and applicable Sensitivity Analyses for this TSR. Note, this information is not included in Table 28. Riparian management area modelling reductions (page 51) nor is the information provided in Table 49 sufficient for consultation.
17. Data Package Section 6.19 Wildlife habitat areas and ungulate winter ranges [lines 14 through 15, page 53] The Data Package states, *“Should the pending UWR for moose be enacted prior to the analysis it will be incorporated into the base case or modelled as a sensitivity analysis.”*
- The Province is asked to clarify the above referenced sentence; (a) will the pending UWR for moose will be incorporated into the Base Case for the TSR? (b) If the pending UWR for moose will not be incorporated into the Base Case, what is the reference number for the Sensitivity Analysis it will be modelled under?
18. Data Package Section 6.20 Other geographically defined exclusions [lines 1 through 2, page 53] The Data Package states, *“This section provides information on additional areas to be excluded from the timber harvesting land base (THLB), as summarized in Table 26, to account for area exclusions not discussed in previous sections.”*
- The Province is asked to clarify and edit the Data Package so that references to tables are correct. ‘Table 26’ in the Data Package refers to “Percent of cutblock area required as wildlife tree retention” and makes no reference to ‘Other geographically defined exclusions’. Table labelling errors throughout the Data Package are confusing and should be corrected prior to commencing official public consultation on the document.
19. Data Package Section 6.20.2 Botrychium Basin Sensitive Area [lines 1 through 3, page 53] The Data Package states, *“The Botrychium Basin Sensitive Area Plan was legally established in March 2002 to preserve a representative example of an antique forest, and to protect a globally significant population of a red-listed fern Botrychium montanum.”*
- The Province is asked to provide a definition of ‘antique forest’.
20. Data Package Section 6.22 Growth and yield and permanent sample plots [Table 33. Growth and yield permanent sample plot reductions and lines 6 through 17, page 58]
- The Province is asked to:
 - a) Clearly state the total number of forest mensuration plots by category (Growth & Yield, Permanent Sample Plots, National Forest Inventory ground samples, CMI samples, Young Stand Monitoring plots) considered under this TSR.

- b) Clearly state which of the categories of plots listed in (a) above are legally protected from harvest.
- c) Please provide a plot file showing the spatial placement of all forest mensuration plots currently used for this TSR process.

21. Data Package Section 7.1.1 Recent harvest performance [Figure 5. Five-year scale volume by species for the Kispiox TSA, page 61]

- Figure 5 outlines five-year scale volume by species for the Kispiox TSA. The Province is asked to provide Kispiox TSA scale volume data by species for the last 13 years (2008 through 2020) for the purposes of consultation regarding the Kispiox TSR.
- The Province is asked to clarify the specific five years correlating to the data in Figure 5 (eg. What years do the data depicted in the graph pertain to?)
- Ten year billed volume data is presented in Table 34, by year. This same information broken out by species is requested (as per the point above).
- There is a drastic difference between the VRI stated portion of the timber profile attributable to cedar and the actual HBS Scaled Volume of cedar over the five-year period reported in Figure 5. HBS Scaled Volume by species is requested for years 2008 through 2020 (the timespan since the previous AAC determination).
- Given the cultural, spiritual, and economic significance of cedar to stakeholders in the Kispiox TSA, it is unreasonable to engage the public in meaningful consultation on the TSR in the absence of full and transparent data around past harvest of this species.

22. Data Package Section 7.1.4 Minimum harvestable criteria [lines 15 through 16, page 62] The Data Package states, "*Sensitivity analyses will investigate the effect on timber supply of lowering and raising the minimum harvestable ages and the minimum harvestable volume criteria.*"

- The Province is asked to clearly state the reference number for the Sensitivity Analyses that will investigate the timber supply impacts of different harvest ages and minimum volume criteria as well as the parameters (suite of harvest ages and volumes) that will be used to conduct these analyses.

23. Data Package Section 7.1.5 Harvest scheduling priorities [bullet 2, page 63] The Data Package states, "*Prioritize harvest over the first decade in accessible low- to medium-burn severity areas of two 2018 wildfires: R41913 (Pope) and R41913 (Gail) to mimic current salvage logging efforts.*"

- The Province is asked to provide spatial files and clearly state the respective areas of (a) the Pope wildfire (R41913) and (b) the Gail wildfire (R41913) as well as the respective burn severity ratings by area for each of the indicated fires.

24. Data Package Section 7.1.7 Log grade 4 [lines 13 through 15, page 64] The Data Package states, "*Available information on dry grade 4 waste and grade 4 credit will be presented to the chief forester for consideration in the AAC determination.*"

- The Province is asked to provide all information on dry grade 4 waste and grade 4 credit that will be provided to the Chief Forester (as per line 14, page 64) for the purposes of meaningful consultation. The increased market demand for pellets and other materials manufactured from low grade wood volume warrants

transparency with the public regarding grade 4 measurement and utilization data that will inform AAC decisions in the Kispiox TSA.

25. Data Package Section 7.2.2 Incremental silviculture [lines 4 through 7, page 64] The Data Package states, *"In the Kispiox TSA during 2008-2010, approximately 560 hectares of "incremental" spacing occurred under the Job Opportunities Program and the Northwest Revitalization Program. The programs targeted dense juvenile forest, between the ages of 15 and 35 years on moderate or higher site class sites, in previously harvested areas, Silviculture and inventory labels were updated in RESULTS."*

- The Province is asked to confirm the number of hectares in the Kispiox TSA where incremental silviculture activities occurred from 2010 through 2020, including juvenile spacing, pre-commercial spacing, pruning, fertilizing, and/or thinning treatments. The figure provided in the Data Package only covers the period from 2008 to 2010 and makes no mention of the period from 2010 to 2020.

26. Data Package Section 7.3.3 Mountain goat [bullet 2, page 71] The Data Package states, *"and from that set, selected those that met the criteria in the preceding paragraph (which reduced the selection to UWR_UNIT_N = 32-34, 44 and 56)."*

- The Province is asked to clearly state the criteria referred to in bullet 2 of page 71. The Data Package notes the criteria referred to in the, 'preceding paragraph...' but it is unclear what criteria are being referred to.

27. Data Package Section 7.3.5 Northern goshawk (*Accipiter gentilis atricapillus*) [Table 45. Goshawk forest cover requirements within the Cranberry SRMP]

- The Province is asked to clearly state the amount of area to be removed from the THLB for the purposes of 'Goshawk - Cranberry SRMP – foraging territories'. Table 45 is unclear; it states 6,100 ha under the column 'Current Retention or (THLB [ha])' but Table 4 (page 27) under Section 6.1 states that 1,623 ha total is to be removed from the THLB for Cranberry SRMP Goshawks, WHAs, and UWRs combined.

28. Data Package Section 7.3.7 Water – hydrological integrity [pages 74 through 76, Table 46] The Data Package states, *"During a multi-year process that concluded in 2007, a Kispiox Expert Water Panel (KEWP) of representatives from the Ministry of Forests, Ministry of Water, Lands, Agriculture and Parks, Federal Department of Fisheries and Oceans, Gitanyow Fisheries Authority, and Gitxsan Watershed Authority developed a strategic plan with the following elements:*

- a) *Kispiox watershed sub-basins (4th Order Watersheds) agreed-on as the base unit for assessment;*
- b) *A Level 1 Watershed Assessment, generated for each sub-basin in accordance with methodologies of the 1995 CODE Interior Watershed Assessment Procedure Guidebook;*
- c) *Direction to licensees on required future detailed assessments for each sub-basin, e.g., stream crossing quality assessment, terrain stability, riparian reserve, gentle-over-steep terrain;*
- d) *Thresholds to high integrity risk, by sub-basin, for indicators including equivalent clearcut area (ECA), peak flow index, road density, and stream*

crossing density. Proposed development beyond thresholds “triggers” future detailed assessments.

- The Province is asked to provide the KEWP report with details on how the ECA caps were determined (Table 46), and the rationale why all 4th Order watersheds are being managed at the high end of moderate risk (low end of high risk).
29. Data Package Section 7.3.8 Biodiversity – patch size distribution [lines 12 through 15, page 77] The Data Package states, *“The spatial model selected for this analysis, Spatial Timber Supply Model (STSM), has a block size distribution function that controls the distribution of patch size. The harvesting component of the STSM model selects eligible and available stands to create an initial harvest cutblock, this block is expanded to adjacent eligible and available stands to reach the target block sizes based on an input distribution.”*
- As per item 8 above, the Province is asked to provide details of the Spatial Timber Supply Model (STSM) developed for the Kispiox TSR, including all input parameters and associated values and assumptions.
30. Data Package Section 7.3.10 Biodiversity – ecosystem networks and buffers [lines 11 through 15, pages 80 and 81 as well as Table 49] The Package states, *“Ecosystem networks – and protective buffers – are also spatially delineated in the Gitwangak LUP and Gitsegukla SRMP areas. In accommodation to First Nations referral concerns, three licensees elected to extend their commitments for Cranberry SRMP EN management into their chart areas within the Gitwangak LUP area. Retention requirements for the Gitwangak LUP and Gitsegukla SRMP areas as shown in Table 49.”*
- The Province is asked to clearly identify retention area (hectares) associated with Ecosystems networks and buffers (a) within the Gitwangak LUP area, and (b) within the Gitsegukla LUP area. As currently presented, Table 49 does not indicate Gitwangak or Gitsegukla LUP areas. Table 49 refers to ‘...GFLI chart in Lower Skeena LU.’ The term ‘GFLI chart’ is not defined in the Data Package, but is presumed to mean the chart area of Gitxsan Forest License Inc. For the purposes of consultation, the Province is asked to provide clarity with respect to modelling of retention in ecosystem networks and associated buffers in the Gitwangak and Gitsegukla LUP areas, respectively.
31. Data Package Section 7.5.4 Non-recoverable losses [Table 56 and pages 89 and 90]
- There are multiple examples in pages 89 and 90 where Table 40 is referenced, but Table 40 in the Data Package indicates a, *“Summary of grizzly bear forest cover requirements for the West Babine and Kispiox SRMPs”*. The errors are found under the following headings (and possible others): Western Balsam Bark Beetle, Spruce Beetle, Wildfire, and Drought. Table labelling errors throughout the Data Package are confusing and should be corrected prior to commencing official public consultation on the document.
32. Data Package Section 8.1.1 Variable density yield prediction model (VDYP7) [page 92]
- The Province is asked to provide data associated with assumptions and input parameters for the VDYP7 model used for the Kispiox TSR, including data informing decay, waste, and breakage estimates. The webpage for additional

VDYP7 information cited under footnote 32 (page 92) of the Data Package leads to a page that says, 'The website cannot be found' as of April 12 2021.

33. Data Package Section 8.1.2 Table interpolation program for stand yields (TIPSY) [page 92]

- The Province is asked to provide all TIPSY yield tables (by species) used to inform the Kispiox TSR;
- The Province is asked to provide all TASS II and TASS III generated yield tables (by species) used to inform the Kispiox TSR.

34. Data Package Section 8.2 Analysis units [lines 6 through 7, page 93]

- The Province is asked to provide details of the assumptions underlying the classification and breakdown of 'Assessment Units'
- As per the request in item 32, the Province is asked to provide yield tables corresponding to each Assessment Unit used to inform the Kispiox TSR.

Conclusion:

AAC determinations have far reaching ecological, social, and economic consequences over the ten-to-fifteen-year life of the decision. Meaningful public consultation regarding the TSR Data Package is an integral part of sustainable resource management in the Kispiox TSA. Meaningful consultation must be supported by transparency and public access to the data that will inform the eventual AAC determination for the Kispiox TSA. On behalf of a number of stakeholder organizations, this letter requests information referenced but not detailed in the Data Package as well as an extension to the due date for public comments. The deadline for release of the Data Package was delayed three years by the Province for reasons unknown to the public. This call for additional information and an extension to the due date for comments is being requested in the Public Interest. The information requested must be supplied and the deadline for comments extended in order to allow for a transparent meaningful public and professional review of the 2021 Kispiox TSR Data Package. Thank you for your consideration and attention to this request.

Respectfully submitted in collaboration,

Babine River Foundation (Carrie Collingwood, Director)

Skeena Watershed Conservation Coalition (Shannon McPhail, Executive Director)

SkeenaWild Conservation Trust (Greg Knox Executive Director; Julia Hill, Operations Manager)

Miluulak, Alice Jeffrey (Gitxsan hereditary head chief)

Lak ts'ap, wilps Miluulak, Monica Jeffrey (Miluulak representative)

Sim 'mishaax, wilps Miluulak, Joshua Jeffrey

Alicia Fernando, MSc. Biologist, Gitksan Watershed Authorities

Allison Oliver, Ph.D., Aquatic Ecologist, Skeena Fisheries Commission

Jim Pojar, PhD, RP Bio, Senior Ecologist (Ecological Society of America)

Sarah Railton, RPF 4795

Len Vanderstar, RPF 2433 (Ret.), RP Bio

cc:

Albert Nussbaum, Director, Forest Analysis and Inventory Branch
Forests.ForestAnalysisBranchOffice@gov.bc.ca
Albert.Nussbaum@gov.bc.ca

Shane Berg, Deputy Chief Forester, Ministry of Forests, Lands, Natural Resource
Operations and Rural Development
Shane.Berg@gov.bc.ca

Diane Nicholls c/o Shannon Pike, Chief Forester & Assistant Deputy Minister, Ministry of
Forests, Lands, Natural Resource Operations and Rural Development
Shannon.Pike@gov.bc.ca

Geoff Recknell, Regional Executive Director, Skeena Natural Resource Region
c/o Bonnie.Zemenchik@gov.bc.ca

Honourable Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations
and Rural Development
c/o FLNR.Minister@gov.bc.ca

Honourable Nathan Cullen, Minister of State for Lands and Natural Resource
Operations
c/o LNRO.Minister@gov.bc.ca



Reference: 263440

May 11, 2021

**VIA EMAIL: sarah_railton@naiadstewardshipsolutions.com
lvanderstar1761@citywest.ca**

Sarah Railton, RPF
Naiad Stewardship Solutions
4795 Merkley Road
Terrace, British Columbia
V8G 0B5

Dear Sarah Railton:

Thank you for your letter of April 19, 2021, requesting additional information to assist in providing comments on the draft Data Package for the Kispiox timber supply area (TSA). I am responding on behalf of the Skeena Stikine Natural Resource District staff that are working on the timber supply review (TSR) for this TSA.

With regards to your first request for an extension to the public review and comment period, the deputy chief forester acknowledges that the current TSR for the Kispiox TSA was initiated in August 2016 and is past its legislated deadline. Therefore, from a stewardship viewpoint, the completion of an allowable annual cut (AAC) determination should not be delayed any further. This is balanced by the need for the AAC decision to be rooted in sound quantitative data. Consequently, the deputy chief forester appreciates the effort of your collaborative group to provide feedback representing the diverse expertise of your members, and believes it would be reasonable to grant an extension until June 30, 2021, to respond to these requests and receive any subsequent information.

With regards to the requests for information, they have been distributed to the TSR team and the appropriate staff will be responding. The team will attempt to provide a timely response so that the extension time granted can be used efficiently to discuss any remaining concerns and receive the subsequent contributions from the collaborative group.

Thank you for your comments so far and your shared interest in the sustainable management of the Kispiox TSA. Your input will contribute to a more robust AAC decision. If you have

Page 1 of 2

Ministry of Forests, Lands, Natural
Resource Operations and Rural
Development

Forest Analysis and Inventory
Branch

Mailing Address:
PO Box 9512 Stn Prov Govt
Victoria BC V8W 9C2

Telephone: 250-356-5947
Fax: 250-387-5999

Sara Railton, RPF

further questions regarding the analysis, please contact me by telephone at 250-739-8262 or via email to Gordon.Nienaber@gov.bc.ca.

Yours truly,



Gordon Nienaber, RPF
Senior Analyst, Timber Supply Areas

pc: Len Vanderstar, RPF (Ret) RP Bio
Honourable Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations
and Rural Development
Honourable Nathan Cullen, Minister of State of Lands, Natural Resource Operations
Diane Nicholls, ADM Chief Forester, Office of the Chief Forester
Geoff Recknell, Regional Executive Director, Skeen Natural Resource Region
Shane Berg, Deputy Chief Forester, Office of the Chief Forester
Albert Nussbaum, Director, Forest Analysis and Inventory Branch

Page 37 of 87 to/à Page 39 of 87

Withheld pursuant to/removed as

s.16

Page 40 of 87

Withheld pursuant to/removed as

s.12

Page 41 of 87 to/à Page 43 of 87

Withheld pursuant to/removed as

s.16

RE: historic number

From: Diane.Nicholls@gov.bc.ca
To: O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>, Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>
Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Sent: October 14, 2021 8:30:05 AM PDT
Attachments: image001.jpg

I agree, that is why I flagged it for Lori so our communications are accurate and not misleading.

AAC determinations are dependant on sustainability issues so in some units, it will not be a large issue, but in others, it will be substantial – imagine this scenario: AAC of 100 gets receives deferrals that hit AAC by 50% yet AAC does not decrease, then we have 1 year (least case) of AAC saying that 100 can come from half the area it was originally based on.....we cannot therefor say we have a sustainable AAC if that is the case.

On top of that we have, as you are well aware, a tenure issue in that once an AAC is reduced, tenures also need to be reduced and with our current track record (PG TSA comes to mind) AAC was reduced 4.5 years ago, but tenures still have not been adjusted and the step down of AAC is occurring in another 6 months or so.....the AAC was sustainable at set numbers, however, our tenure allowances of amount to cut are completely out of whack.....and therefore poses a risk to having to do AACs earlier each time.....

Regardless if a new AAC is required, FAIB and CF need to do the analysis and assessment to come to that conclusion for any unit affected by defferals, so it is an enormous work load in short time span when we are already behind in AAC determinations.

Happy to chat further.....

Diane Nicholls, RPF

Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>
Sent: October 14, 2021 8:21 AM
To: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>; Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>
Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Subject: RE: historic number

Diane,

Does the AAC determination requirement depend how long the deferrals will be in place? I agree that the deferrals are likely to last a few years (and in many cases will be permanent) and therefore new AACs are required. But theoretically if the deferrals were only for one year would we still need new AACs?

I am also concerned about just using the ^{s.12; s.13} number. It feels misleading and when industry picks up on that gov will get slammed.



Eamon O'Donoghue
Associate Deputy Minister
Regional Operations
Phone (250) 847-7495
Cell (250) 877-1087
**Forests, Lands, Natural Resource Operations
and Rural Development**
(he/him/his)

From: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Sent: October 14, 2021 8:06 AM
To: Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>; O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>
Cc: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Subject: RE: historic number

That is why they are using it but it is not realistic as that was prior to activity.....is there any way not to use it?

On another note, David seems to only want to use the s.12; s.13 number of deferral sites that are the actual permits, however, permits will not be allowed in any of the areas so it is a larger number. You need to be aware.

Also, a quick assessment by my team tells me due to these deferrals, whether they be permit deferrals or whole areas, the Chief Forester is going to have to do AAC determinations across the province. This is a problem. The permit deferrals are only one part of the considerations that go into this – however, if no permits will be allowed in any areas, then it ties up a bunch of places that will/could affect sustainable levels of harvest activity.

Give me a call if you want to discuss.

Diane Nicholls, RPF
Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>
Sent: October 13, 2021 7:09 PM
To: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Subject: Re: historic number

Thanks Diane. No need for further work. Just wanted to make sure that if this is released, it is understood where it came from. We have never used this magnitude of a number before so may be seen as alarming. Lorie

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From: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Sent: Wednesday, October 13, 2021 5:38:37 PM
To: Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>
Subject: RE: historic number

It is roughly correct error bars are potentially large.....we can recreate the number.....and timeline is prior to climate change and long time ago....i can get more information to you if need be?

Diane Nicholls, RPF
Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>
Sent: October 13, 2021 3:19 PM
To: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Subject: historic number

Diane, TAP has provided the following statement 'Historically there was approximately 25 million hectares of old growth in BC'. Is this accurate? And what timeline would that be attributed to?

Lorie

Lorie Hrycuik, Executive Lead
Forestry Renewal Initiative
Email: lorie.hrycuik@gov.bc.ca
Ph: 778 974 3766
Mobile: 250-415-9284

FW: Ancient forest in qathet Regional District

From: Diane.Nicholls@gov.bc.ca
To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>
Sent: November 25, 2021 7:54:18 AM PST
Attachments: JGwq9a6BIDT11X0S.png, kqJ0oVgALBO8j7y7.png, 7AtRdue1SyxFd2Uo.png, 21-11 FLNRORD Conroy_OG ancient forest deferrals.docx, MJo5hMod0JXyuuR5.png, FysVzSJxFzn765ZF.png, m1iABgYKopRNlgJ7.png

Diane Nicholls, RPF

Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

From: Janet May s.22

Sent: November 24, 2021 10:28 PM

To: Minister, FLNR FLNR:EX <FLNR.Minister@gov.bc.ca>

Cc: Hegus John Hackett <john.hackett@tn-bc.ca>; Kevin Peacey <kevinpeacey@klahoose.org>; Henry Warren Paull <wpaul@shishalh.com>; Simons.MLA, Nicholas LASS:EX <Nicholas.Simons.MLA@leg.bc.ca>; Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>; Johnsrude, Allan N FLNR:EX <Allan.Johnsrude@gov.bc.ca>; Hamod, Wendy D FLNR:EX <wendy.hamod@gov.bc.ca>; Lefler, Derek FLNR:EX <Derek.Lefler@gov.bc.ca>; Rachel Holt <rachel@veridianecological.ca>; pbrabazon@qathet.ca; dformosa@powellriver.ca; Cullen, Nathan LASS:EX <Nathan.Cullen.MLA@leg.bc.ca>

Subject: Ancient forest in qathet Regional District

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

re: concerns regarding Provincial mapping of priority old growth harvest deferral areas

Dear Minister Conroy,

Qathet Old Growth (qOG) believes that ancient forests in our regional district have not been identified for priority deferral due to faults in the Provincial Vegetation Resource Inventory (VRI) data. We respectfully ask that you address this issue as outlined below.

Qathet Old Growth was pleased to hear the BC Government's November 2nd announcement on its intent to pursue "priority deferral" of 2.6 million hectares of old growth forest. It is also pleased with the release of the Old Growth Technical Advisory Panel's report on priority deferrals and associated maps.

While qOG applauds many aspects of the Technical Advisory Panel's (TAP) report and mapping, we have significant concerns regarding their Map 4: Ancient Forest (depicted for qathet Regional District in **Figure 1**), and how this mapping skews their proposed priority harvest deferral areas (depicted for qathet Regional District in **Figure 2**). Priority harvest deferral areas were derived by combining TAP's Prioritized Big-tree Old Growth (Map 3), Remnant Old Ecosystems (Map 4) and Ancient Forests (Map 5) (to view, refer to this interactive website).

Our concerns relate to inherent deficiencies in the Provincial Vegetation Resource Inventory (VRI), whereby age class data does not discriminate between old (250+ yo) and ancient (400+ yo) forests, and ages assigned to old growth stands are unreliable and often underestimated (therefore requiring on the ground identification using tree core analysis). Our review of the spatial data for qathet Regional District (qRD) indicates that these deficiencies have likely resulted in a significant underestimation of extent of ancient forest occurring in qRD, with far fewer priority deferral areas (**Figure 2**) being identified by TAP as a result.

For reasons outlined in **Box 1** below, we believe that **Figure 3** is a more accurate representation of the likely extent of ancient forest in the qRD, **and that these areas should be included in TAP's priority deferral areas mapping** (as illustrated in **Figure 4**), unless otherwise ruled out by groundtruthing via tree core analysis.

In qRD the stakes are high in this regard, as most old growth logging is currently taking place in higher elevation remnant forests that are more likely to be ancient (most of the lower elevation, easily accessed forest having already been logged). This is exemplified by the attached report which documents trees between 800 and 1200 years old felled in a recent WFP cutblock on Mount Freda; the VRI assigned age for this stand was 351 years (also see attached *Powell River Living article*);

Figure 5 shows that a number of old growth stands within proposed Western Forest Products (WFP) cutblocks fall outside TAP's currently proposed priority deferral areas. **qOG believes there is a significant probability that these stands are actually ancient, and that at a minimum groundtruthing of the ages of these stands is urgently required.** Similar cutblocks proposed by other licensees require the same treatment.

qOG respectfully asks that you **address these concerns about underrepresentation and mislabelling of ancient forests prior to finalizing priority deferral areas for qRD**, and provide the public and First Nations with a methodology detailing how this will be done given the absence of reliable spatial data. We ask that you use the precautionary application of surrogate data (such as we did in generating **Figure 2**), and comprehensive groundtruthing via tree core analysis.

Yours truly,

Janet May

for qathet Old Growth

Attached:

Mount Freda, Powell River Living (Jan 2021)

[Link to high resolution maps for Figures 1 to 5](#)

Box 1. Reasons for concern about TAP's ancient forest and priority deferral area mapping in qathet Regional District:

1. In qathet Regional District, most of the remaining Big Tree Old Growth is located in wetter and higher elevation areas (i.e. the CWHvm and MHmm biogeoclimatic subzones) due to extensive historic logging in lower elevations, coastal areas, and along valley bottoms.
2. Because wetter and higher elevation coastal forests naturally experience only low levels of disturbance (e.g. fire), historically these forests would have been 85-95% old growth (as per **Table 1** in our March 2021 report to the Minister). Fire-return intervals in these types of forests have been estimated at between 700 and 6000 years¹, and as a result some forests are many thousands of years old². For example, the Caren Range Forest of the lower Sunshine Coast is known to have 1250 year old Hemlock and 1824 Yellow Cedar, and may be the oldest known closed canopy forest in the world³.
3. Consequently, in qRD the ages of many remaining big tree old growth stands in the CWHvm and MHmm BEC subzones would be expected to be ancient (400+ years old), particularly those stands in the MHmm subzone, where trees are slow growing and small for their age (and hence are often many hundreds of years old before reaching a harvestable size). This is depicted by **Figure 3**, in which we highlight higher elevation big tree stands in the CWHvm and MHmm zones labelled as 300+ years old in the VRI, which we believe are likely to actually exceed 400 years of age.
4. In comparison, the Technical Advisory Panel's mapping of ancient forest⁴ (**Figure 1**) shows only a handful of ancient forest stands in the qathet Regional District, with none being labelled as greater than

557 years old.

5. Empirically we know there are mislabelled ancient stands in gRD, including stands that are greater than 557 years old. Tree ring counts on a selection of stumps in a recent WFP cutblock in the MHmm zone of Mount Freda (in the gRD) found trees between 800 and 1200 years old (see attached report, and Powell River Living Article⁵). However, the VRI assigned age for the stand was only 351 years, illustrating the limitations of using existing provincial forest cover data to identify ancient forest attributes. We are certain many more ancient forest stands will be revealed by further groundtruthing efforts.

¹ Lertzman, K., D. Gavin, D. Hallet, L. Brubaker, D. Lepofsky and R. Mathewes. 2002. Long-term fire regime estimated from soil charcoal in coastal temperate rainforests. *Conservation Ecology* 6(2): 5.

<http://www.consecol.org/vol6/iss2/art5>

² Price, K., R.F. Holt and D. Daust (2020). *BC's Old Growth Forest: A Last Stand for Biodiversity*.

³ Jones, P. (2003). *Caren Range Ancient Forest*. Paper submitted to the XKK World Forestry Congress, 2003, Quebec City, Canada. <https://www.fao.org/3/XII/0081-B1.htm>

⁴ Which was based on Province of BC 2010. BC Land Management Handbook #25. Structural stage 7b. NDT 1, 2 and 4 for less frequent disturbance.

⁵ *Millenia-old cedars felled on Mount Freda (May 2021)*



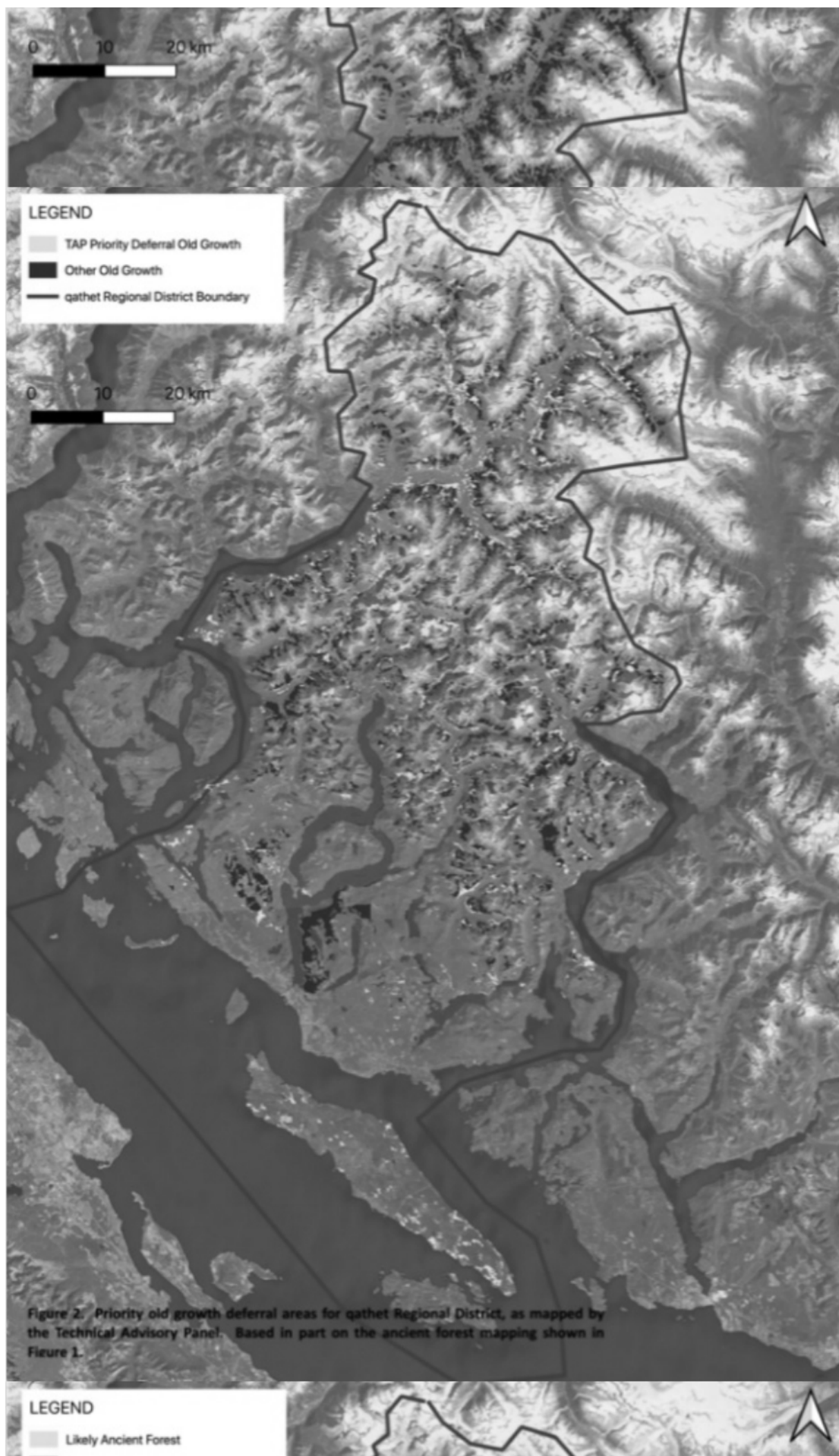
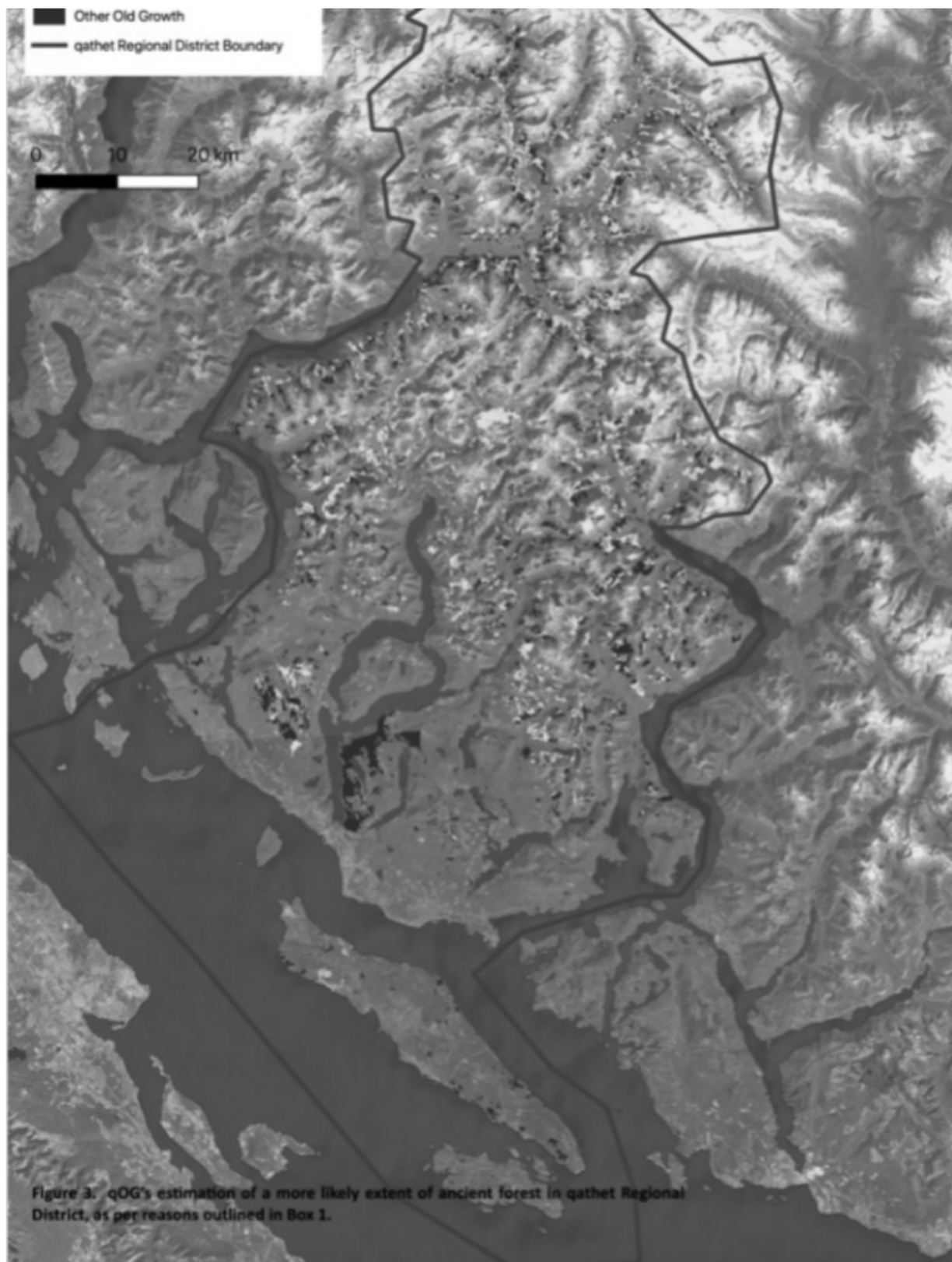


Figure 2. Priority old growth deferral areas for Qathet Regional District, as mapped by the Technical Advisory Panel. Based in part on the ancient forest mapping shown in Figure 1.



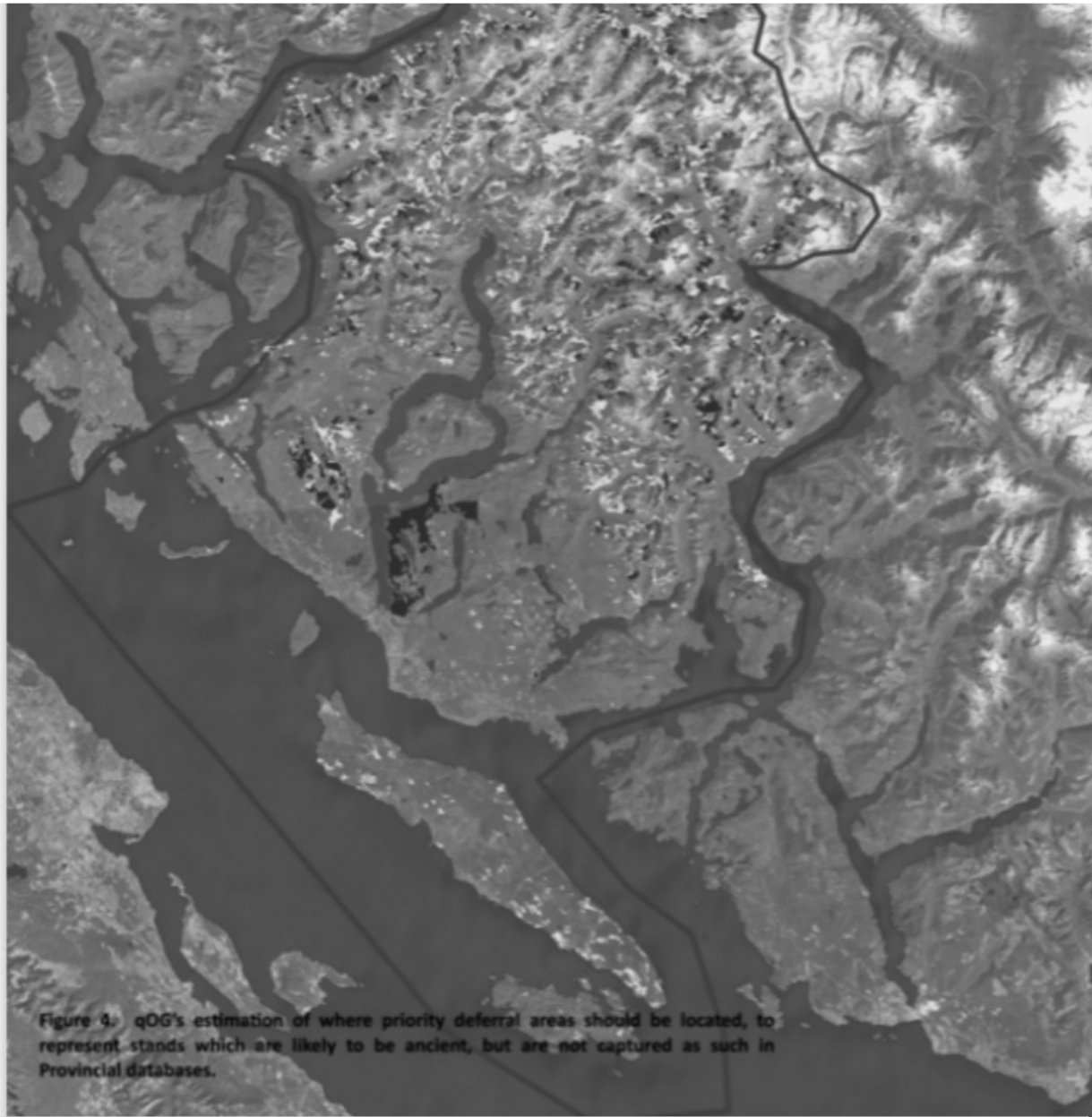
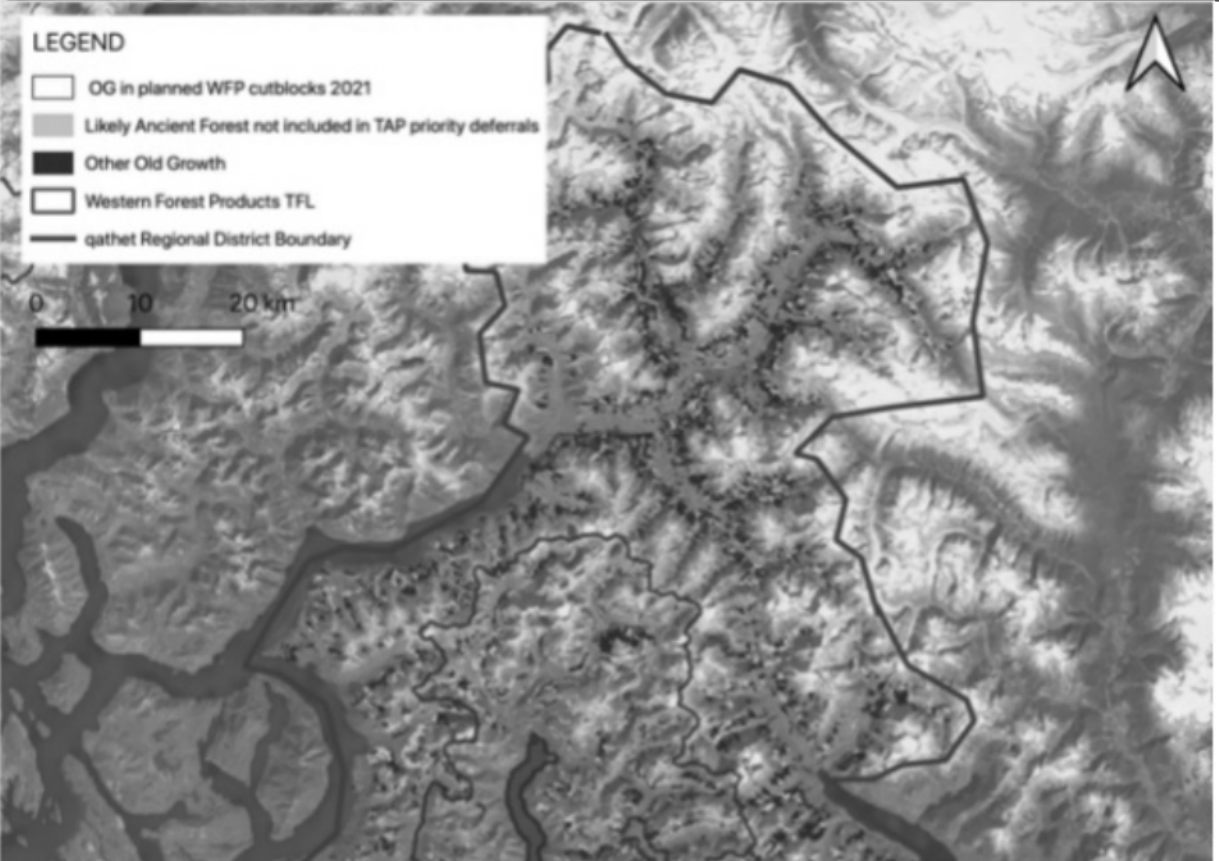
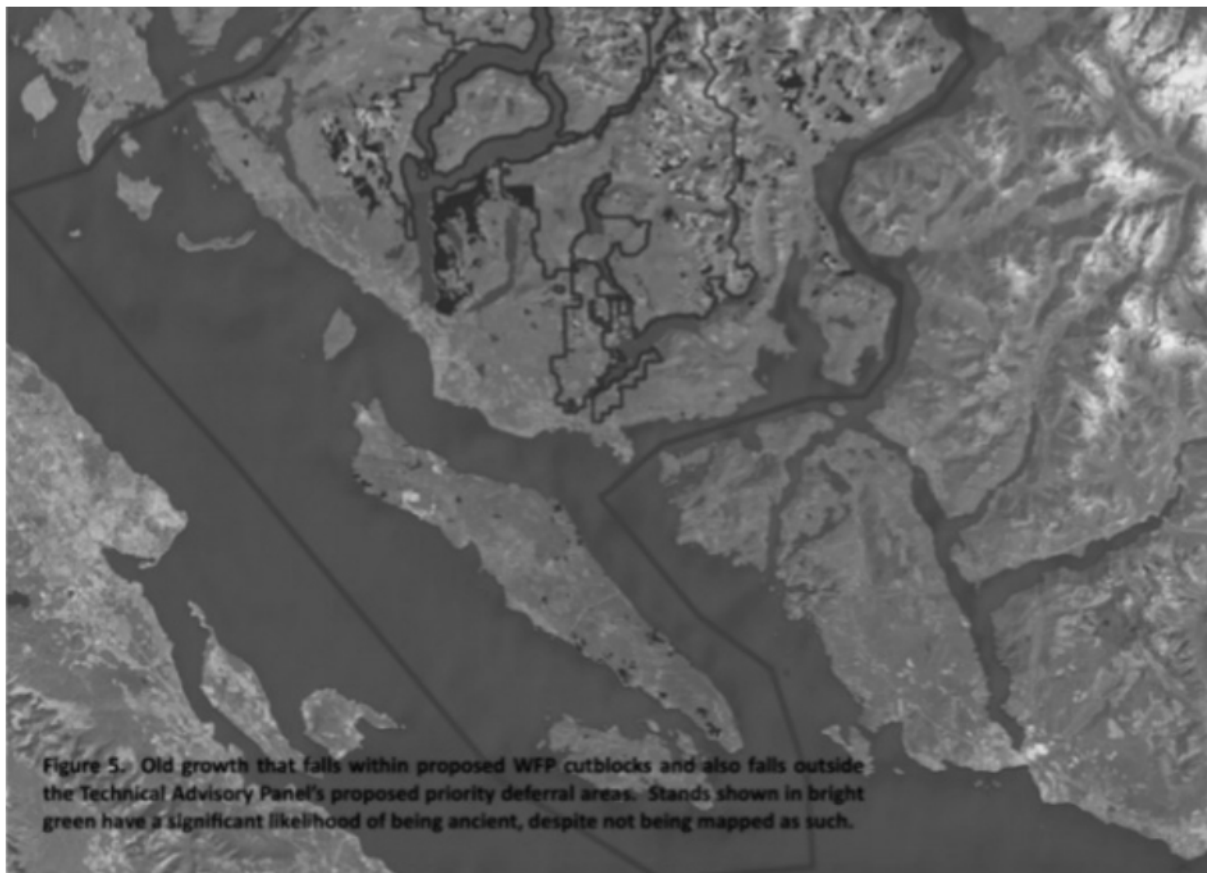


Figure 4: qOG's estimation of where priority deferral areas should be located, to represent stands which are likely to be ancient, but are not captured as such in Provincial databases.





cc :

Hegus John Hackett, Tla'amin Nation, john.hackett@tn-bc.ca

hiwus Henry Warren Paull , shíshálh Nation, wpaul@shishalh.com
 Chief Kevin Peacey, kevinpeacey@klahoose.org

Nicholas Simons, MLA Powell River- Sunshine Coast Nicholas.Simons.MLA@leg.bc.ca

Diane Nicholls, Chief Forester, Resource Stewardship Division, Diane.Nicholls@gov.bc.ca

Allan Johnsrude, South Coast Natural Resource Region, Allan.Johnsrude@gov.bc.ca

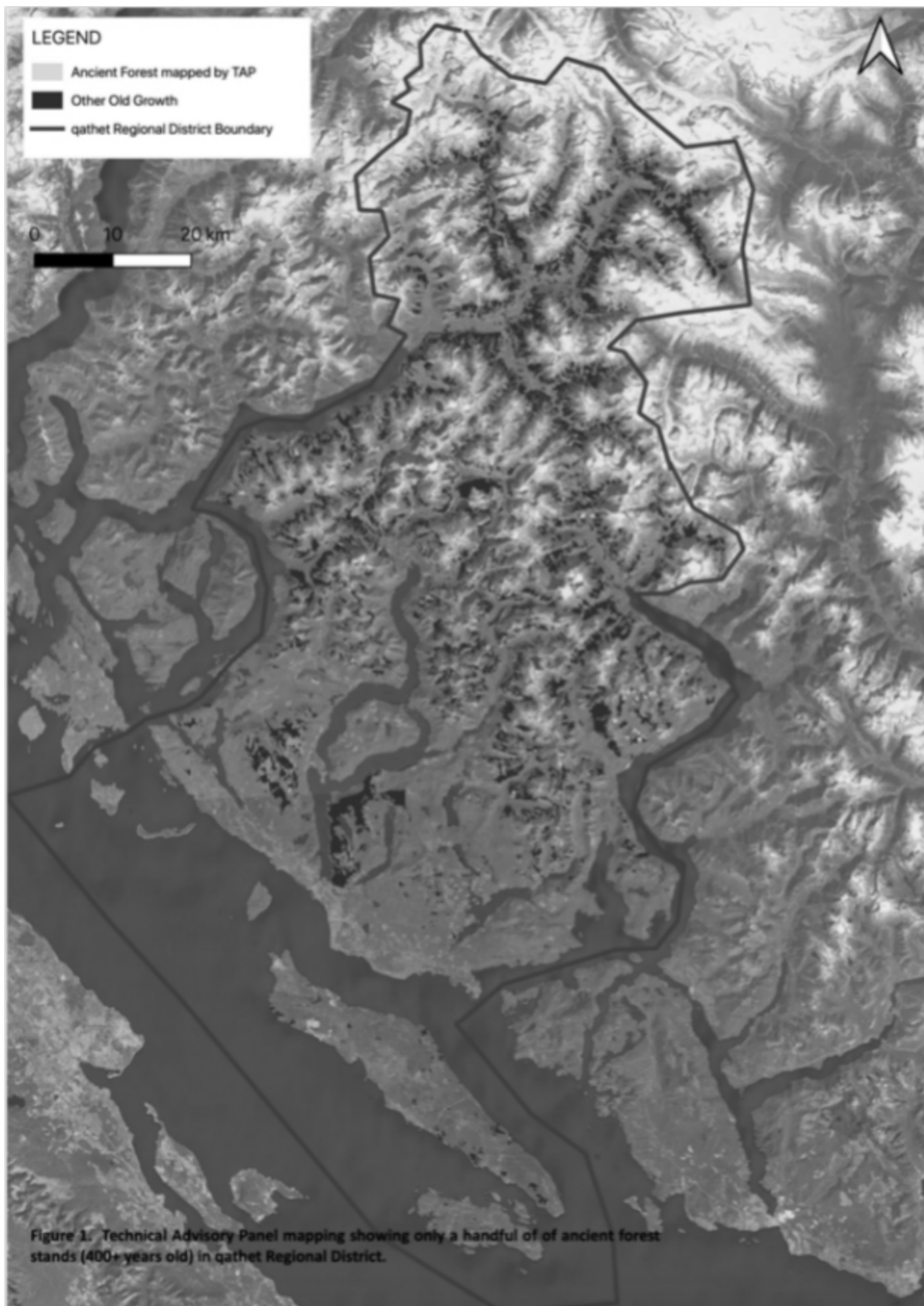
Wendy Hamod, South Coast Natural Resource Region, wendy.hamod@gov.bc.ca

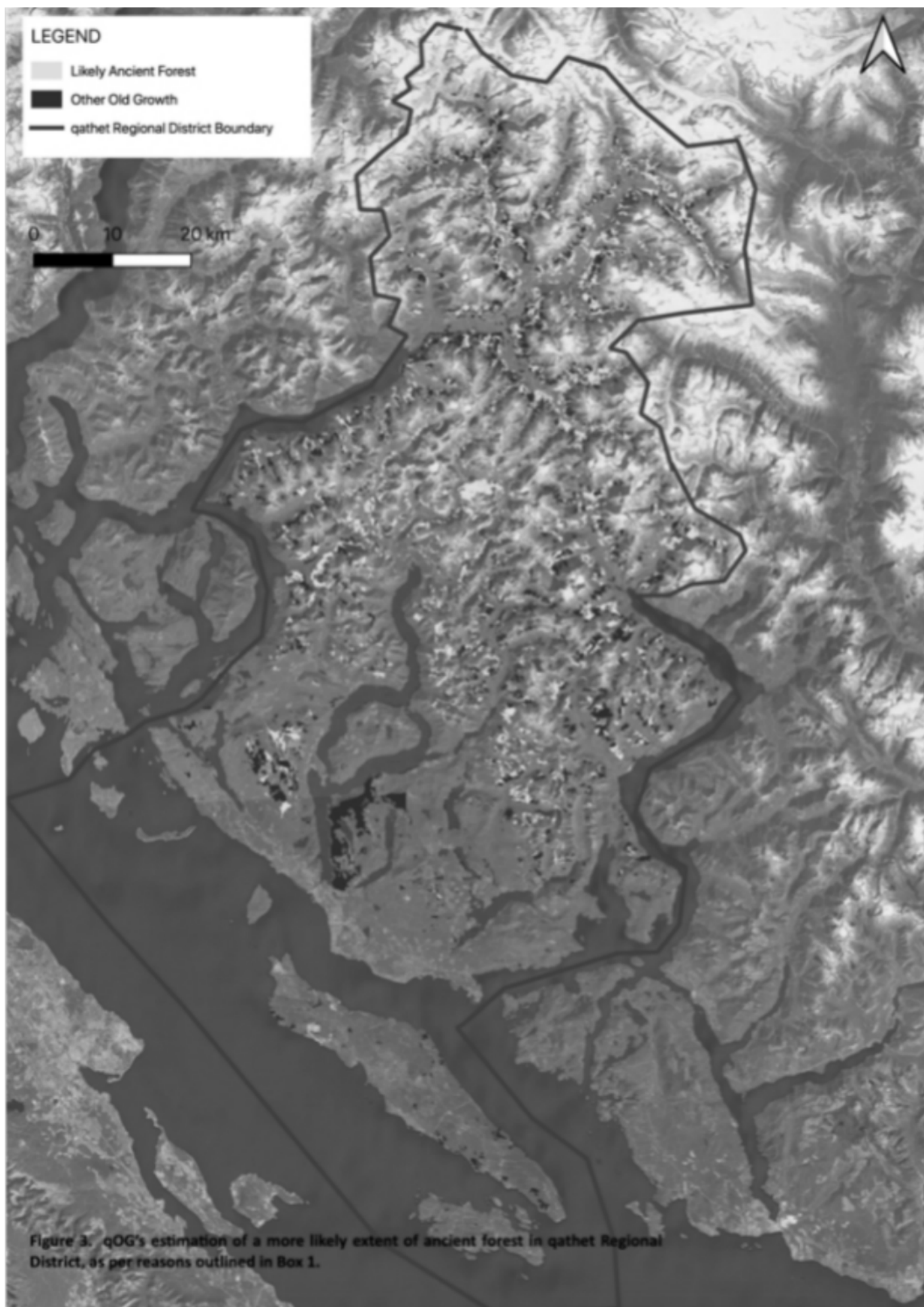
Derek Lefler, Sunshine Coast Natural Resource District Manager, Derek.Lefler@gov.bc.ca

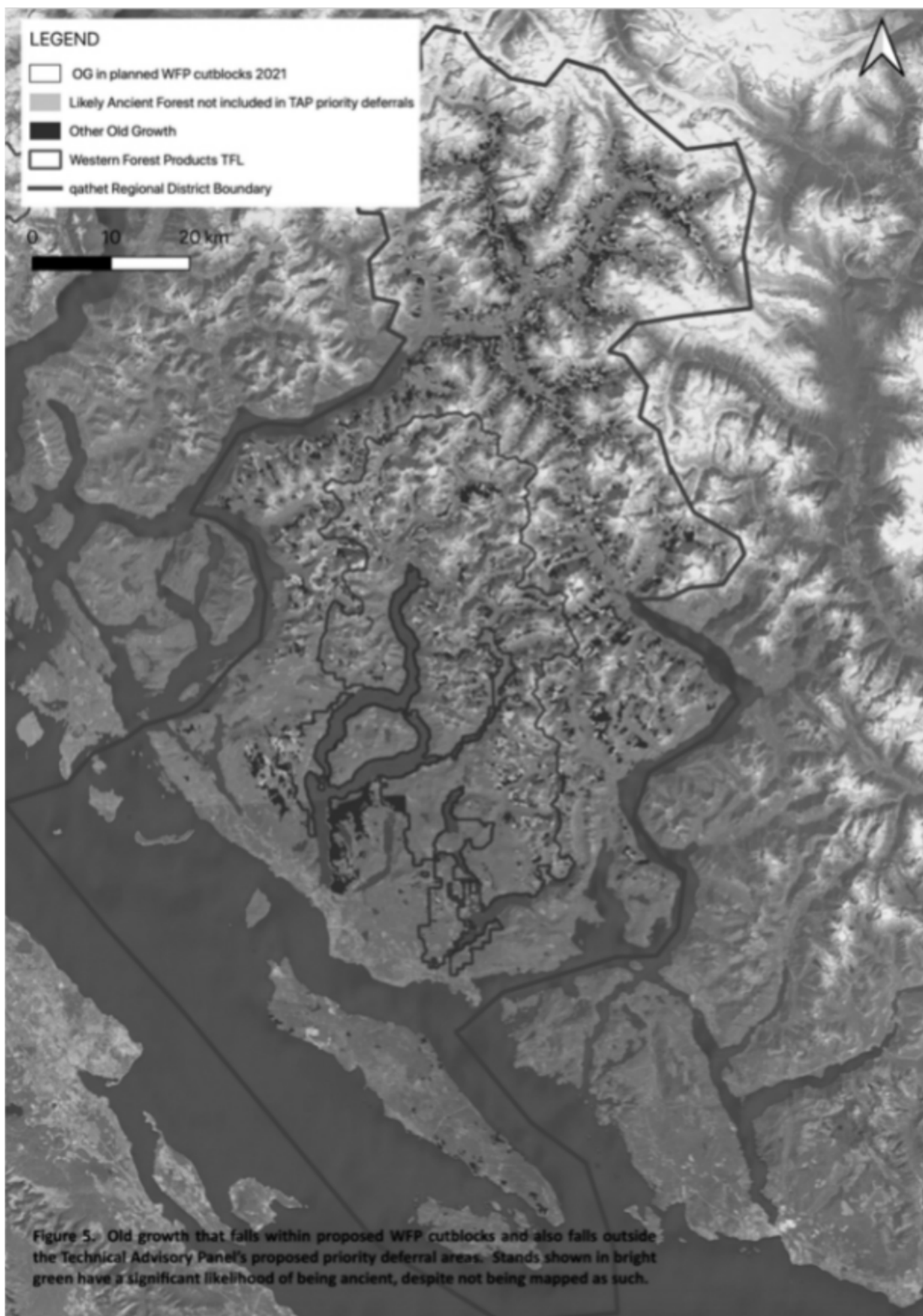
Rachel Holt, Technical Advisory Panel, rachel@veridianecological.ca

Patrick Brabazon, qathet Regional District, pbrabazon@qathet.ca

Mayor Dave Formosa, City of Powell River, dformosa@powellriver.ca







From: qathet Old Growth
s.22

To: Honourable Katrine Conroy
Minister of Forests, Lands, Natural Resource Operations and Rural Development

November , 2021

re: concerns regarding Provincial mapping of priority old growth harvest deferral areas

Dear Minister Conroy,

Qathet Old Growth (qOG) believes that ancient forests in our regional district have not been identified for priority deferral due to faults in the Provincial Vegetation Resource Inventory (VRI) data. We respectfully ask that you address this issue as outlined below.

Qathet Old Growth was pleased to hear the BC Government's November 2nd announcement on its intent to pursue "priority deferral" of 2.6 million hectares of old growth forest. It is also pleased with the release of the Old Growth Technical Advisory Panel's report on priority deferrals and associated maps.

While qOG applauds many aspects of the Technical Advisory Panel's (TAP) report and mapping, we have significant concerns regarding their Map 4: Ancient Forest¹ (depicted for qathet Regional District in **Figure 1**), and how this mapping skews their proposed priority harvest deferral areas (depicted for qathet Regional District in **Figure 2**). Priority harvest deferral areas were derived by combining TAP's Prioritized Big-tree Old Growth (Map 3), Remnant Old Ecosystems (Map 4) and Ancient Forests (Map 5) (to view, refer to this interactive website).

Our concerns relate to inherent deficiencies in the Provincial Vegetation Resource Inventory (VRI), whereby age class data does not discriminate between old (250+ yo) and ancient (400+ yo) forests², and ages assigned to old growth stands are unreliable and often underestimated (therefore requiring on the ground identification using tree core analysis³). Our review of the spatial data for qathet Regional District (qRD) indicates that these deficiencies have likely resulted in a significant underestimation of extent of ancient forest occurring in qRD, with far fewer priority deferral areas (**Figure 2**) being identified by TAP as a result.

For reasons outlined in **Box 1** below, we believe that **Figure 3** is a more accurate representation⁴ of the likely extent of ancient forest in the qRD, **and that these areas should be included in TAP's priority deferral areas mapping** (as illustrated in **Figure 4**), unless otherwise ruled out by groundtruthing via tree core analysis.

¹ According to the Old Growth Strategic Review, ancient (400+ year old) forests have ancient genetic material and are repositories of biota and processes we may not even know or understand. This makes them an extremely important buffer against species extinction, climate change, and lost future opportunities. These "ancient forests" are globally unique, rare, and contain species as yet undiscovered, and many of these ecosystems and old forests are non-renewable within any reasonable time frame. Many of these irreplaceable forests are in the timber harvesting land base and are subject to logging,

² Holt R., Price, K., Kremsater, L., MacKinnon, A., and K. Lertzman (2008). *Defining old growth and recovering old growth on the coast: discussion of options*. Report prepared for the Ecosystem Based Management Working Group .

³ Old Growth Technical Advisory Panel (2021). *Priority Deferral Areas: An Ecological Approach*.

In qRD the stakes are high in this regard, as most old growth logging is currently taking place in higher elevation remnant forests that are more likely to be ancient (most of the lower elevation, easily accessed forest having already been logged). This is exemplified by the attached report which documents trees between 800 and 1200 years old felled in a recent WFP cutblock on Mount Freda; the VRI assigned age for this stand was 351 years (also see attached *Powell River Living article*⁵);

Figure 5 shows that a number of old growth stands within proposed Western Forest Products (WFP) cutblocks fall outside TAP's currently proposed priority deferral areas. **qOG believes there is a significant probability that these stands are actually ancient, and that at a minimum groundtruthing of the ages of these stands is urgently required.** Similar cutblocks proposed by other licensees require the same treatment.

qOG respectfully asks that you **address these concerns about underrepresentation and mislabelling of ancient forests prior to finalizing priority deferral areas for qRD**, and provide the public and First Nations with a methodology detailing how this will be done given the absence of reliable spatial data. We ask that you use the precautionary application of surrogate data (such as we did in generating **Figure 2**), and comprehensive groundtruthing via tree core analysis.

Yours truly,

Janet May

for qathet Old Growth

Attached:

GIS Analysis of Forest Cover in the qathet Regional District (2021)

[Mount Freda, Powell River Living \(Jan 2021\)](#)

[Link to high resolution maps for Figures 1 to 5](#)

cc :

Hegus John Hackett, Tla'amin Nation, john.hackett@tn-bc.ca

hiwus Henry Warren Paull , shíshálh Nation, wpaul@shishalh.com

Nicholas Simons, MLA Powell River- Sunshine Coast Nicholas.Simons.MLA@leg.bc.ca

Diane Nicholls, Chief Forester, Resource Stewardship Division, Diane.Nicholls@gov.bc.ca

Allan Johnsrude, South Coast Natural Resource Region, Allan.Johnsrude@gov.bc.ca

Wendy Hamod, South Coast Natural Resource Region, wendy.hamod@gov.bc.ca

Derek Lefler, Sunshine Coast Natural Resource District Manager, Derek.Lefler@gov.bc.ca

Rachel Holt, Technical Advisory Panel, rachel@veridianecological.ca

Patrick Brabazon, qathet Regional District, pbrabazon@qathet.ca

Mayor Dave Formosa, City of Powell River, dformosa@powellriver.ca

⁴ by including stands with a reasonable likelihood of being ancient: i.e. higher elevation big-tree Old Growth assigned as 300+ years old by the VRI.

⁵[Millenia-old cedars felled on Mount Freda \(May 2021\)](#)

Box 1. Reasons for concern about TAP's ancient forest and priority deferral area mapping in qathet Regional District:

1. In qathet Regional District, most of the remaining Big Tree Old Growth) is located in wetter and higher elevation areas (i.e. the CWHvm and MHmm biogeoclimatic subzones) due to extensive historic logging in lower elevations, coastal areas, and along valley bottoms.
2. Because wetter and higher elevation coastal forests naturally experience only low levels of disturbance (e.g. fire), historically these forests would have been 85-95% old growth (as per **Table 1** in our March 2021 report to the Minister). Fire-return intervals in these types of forests have been estimated at between 700 and 6000 years¹, and as a result some forests are many thousands of years old². For example, the Caren Range Forest of the lower Sunshine Coast is known to have 1250 year old Hemlock and 1824 Yellow Cedar, and may be the oldest known closed canopy forest in the world³.
3. Consequently, in qRD the ages of many remaining big tree old growth stands in the CWHvm and MHmm BEC subzones of would be expected to be ancient (400+ years old), particularly those stands in the MHmm subzone, where trees are slow growing and small for their age (and hence are often many hundreds of years old before reaching a harvestable size). This is depicted by **Figure 3**, in which we highlight higher elevation big tree stands in the CWHvm and MHmm zones labelled as 300+ years old in the VRI, which we believe are likely to actually exceed 400 years of age.
4. In comparison, the Technical Advisory Panel's mapping of ancient forest⁴ (**Figure 1**) shows only a handful of ancient forest stands in the qathet Regional District, with none being labelled as greater than 557 years old.
5. Empirically we know there are mislabelled ancient stands in qRD, including stands that are greater than 557 years old. Tree ring counts on a selection of stumps in a recent WFP cutblock in the MHmm zone of Mount Freda (in the qRD) found trees between 800 and 1200 years old (see attached report, and Powell River Living Article⁵). However, the VRI assigned age for the stand was only 351 years, illustrating the limitations of using existing provincial forest cover data to identify ancient forest attributes. We are certain many more ancient forest stands will be revealed by further groundtruthing efforts.

¹ Lertzman, K., D. Gavin, D. Hallet, L. Brubaker, D. Lepofsky and R. Mathewes. 2002. Long-term fire regime estimated from soil charcoal in coastal temperate rainforests. *Conservation Ecology* 6(2): 5.

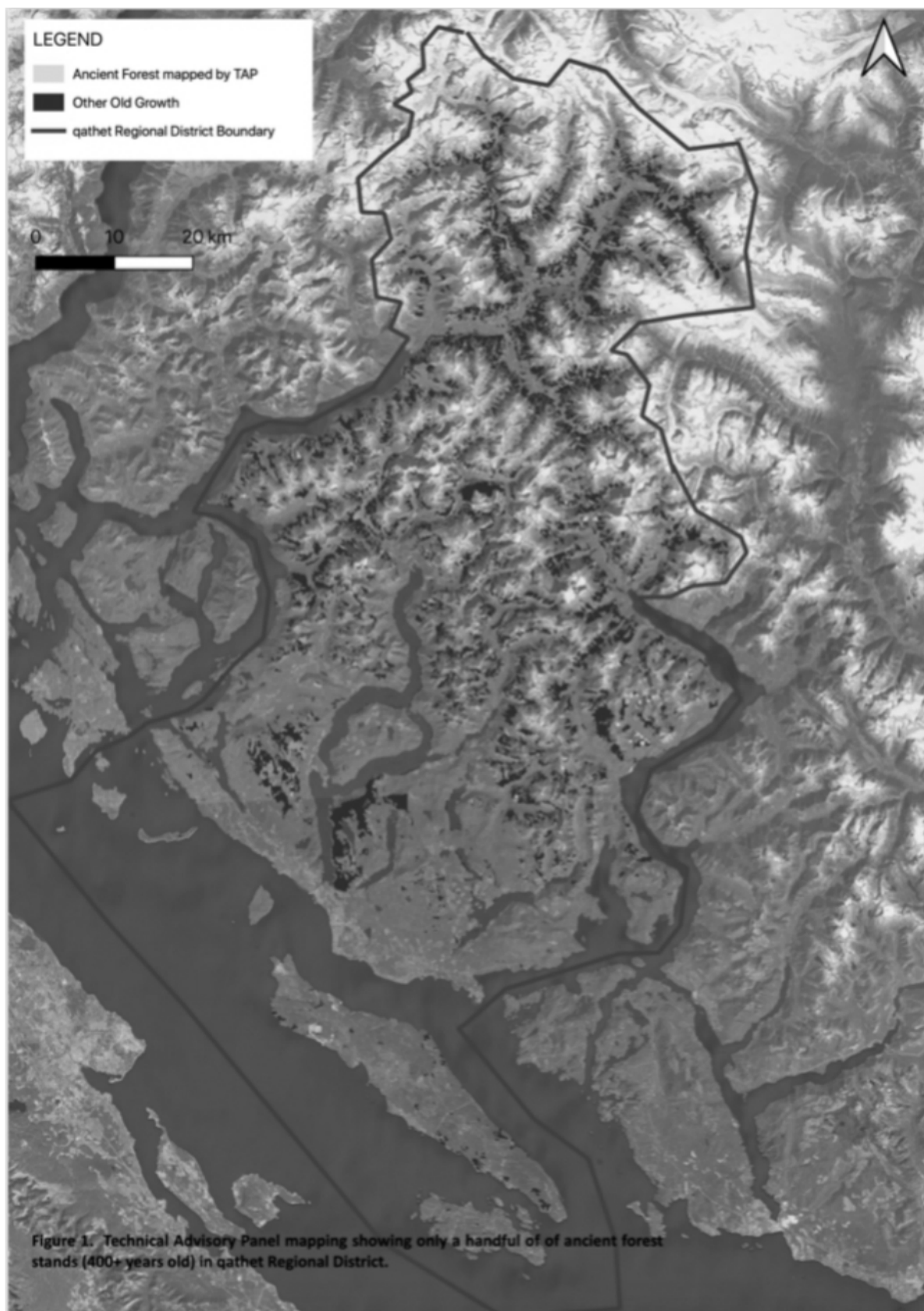
<http://www.consecol.org/vol6/iss2/art5>

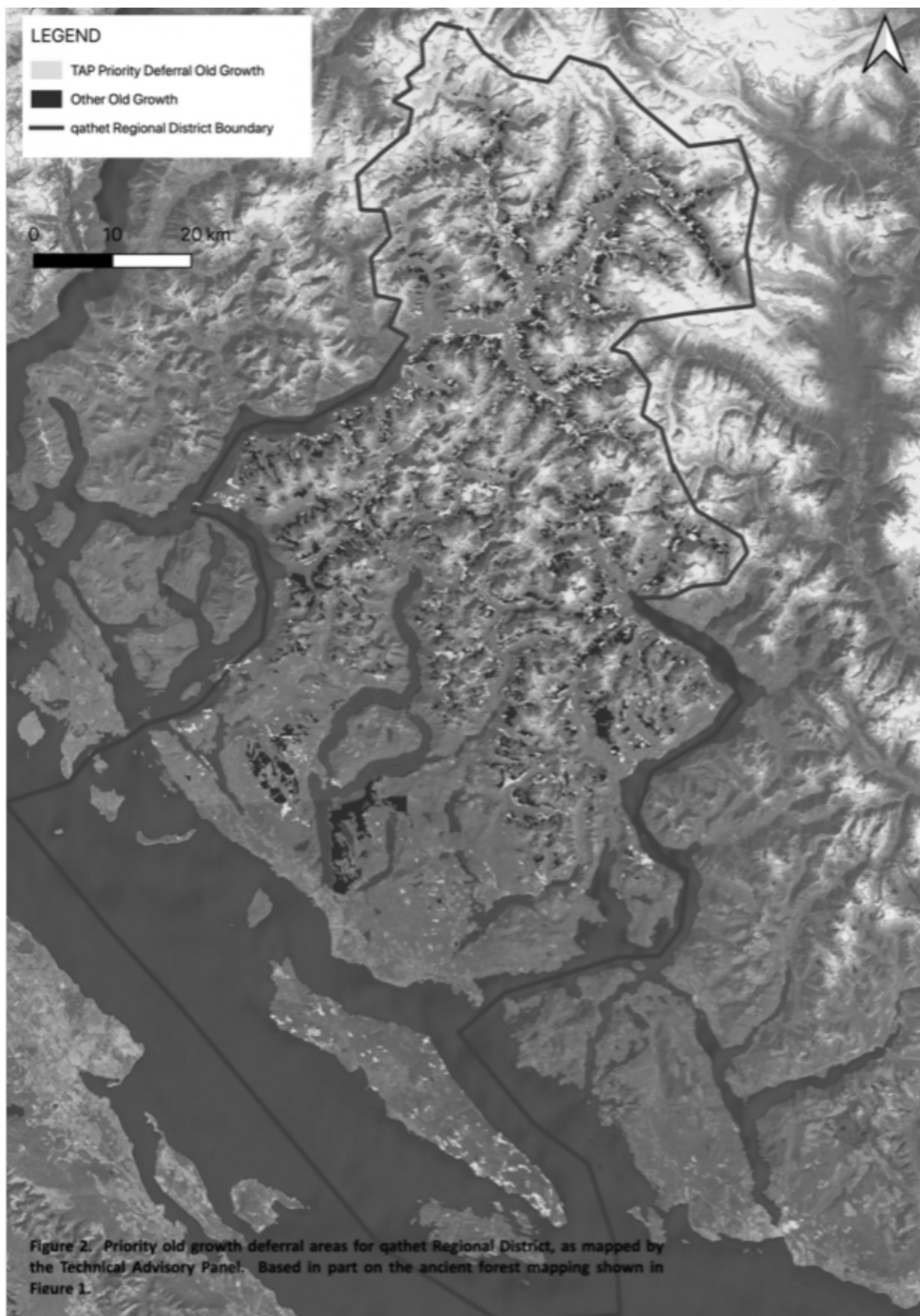
² Price, K., R.F. Holt and D. Daust (2020). *BC's Old Growth Forest: A Last Stand for Biodiversity*.

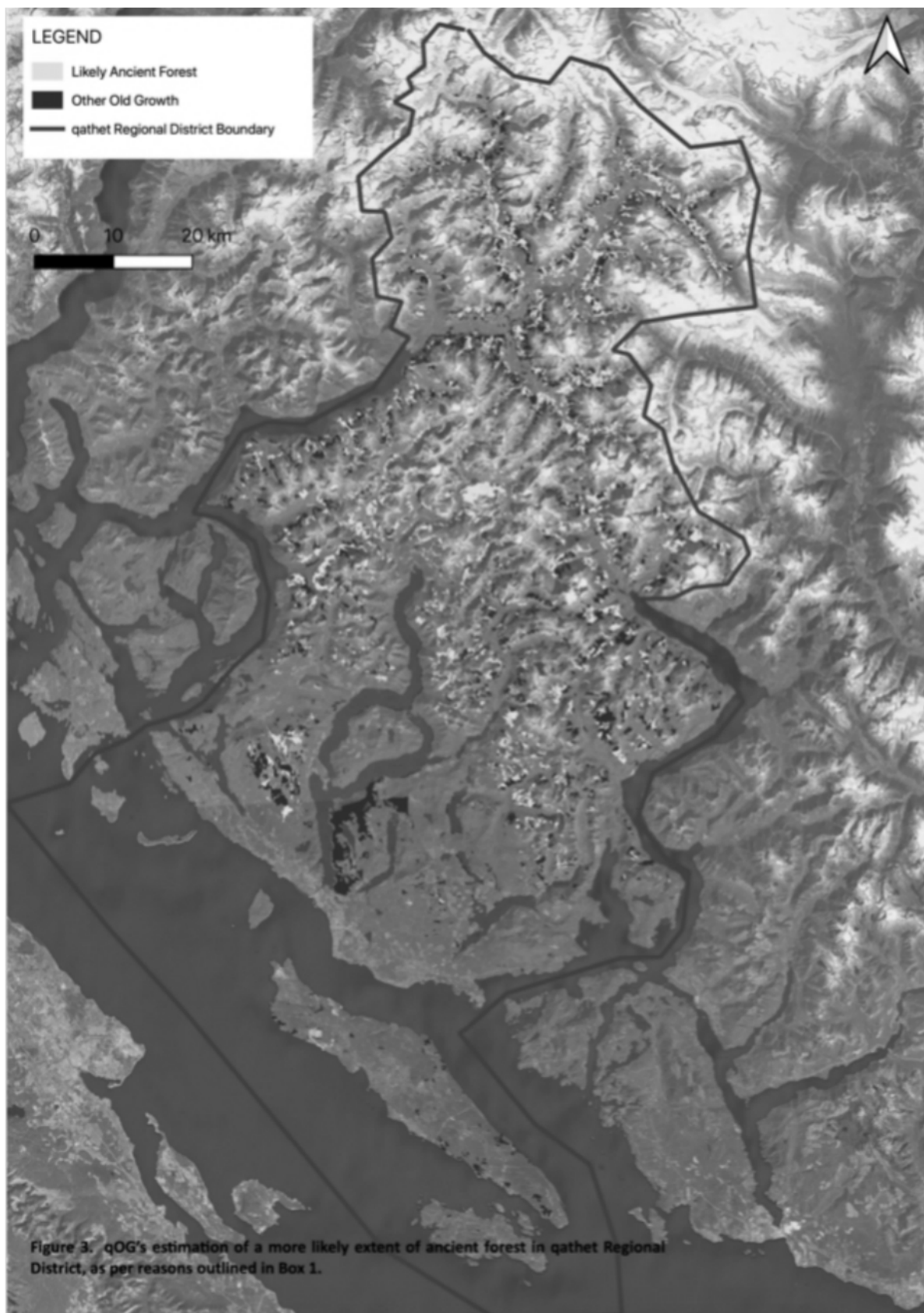
³ Jones, P. (2003). *Caren Range Ancient Forest*. Paper submitted to the XKK World Forestry Congress, 2003, Quebec City, Canada. <https://www.fao.org/3/XII/0081-B1.htm>

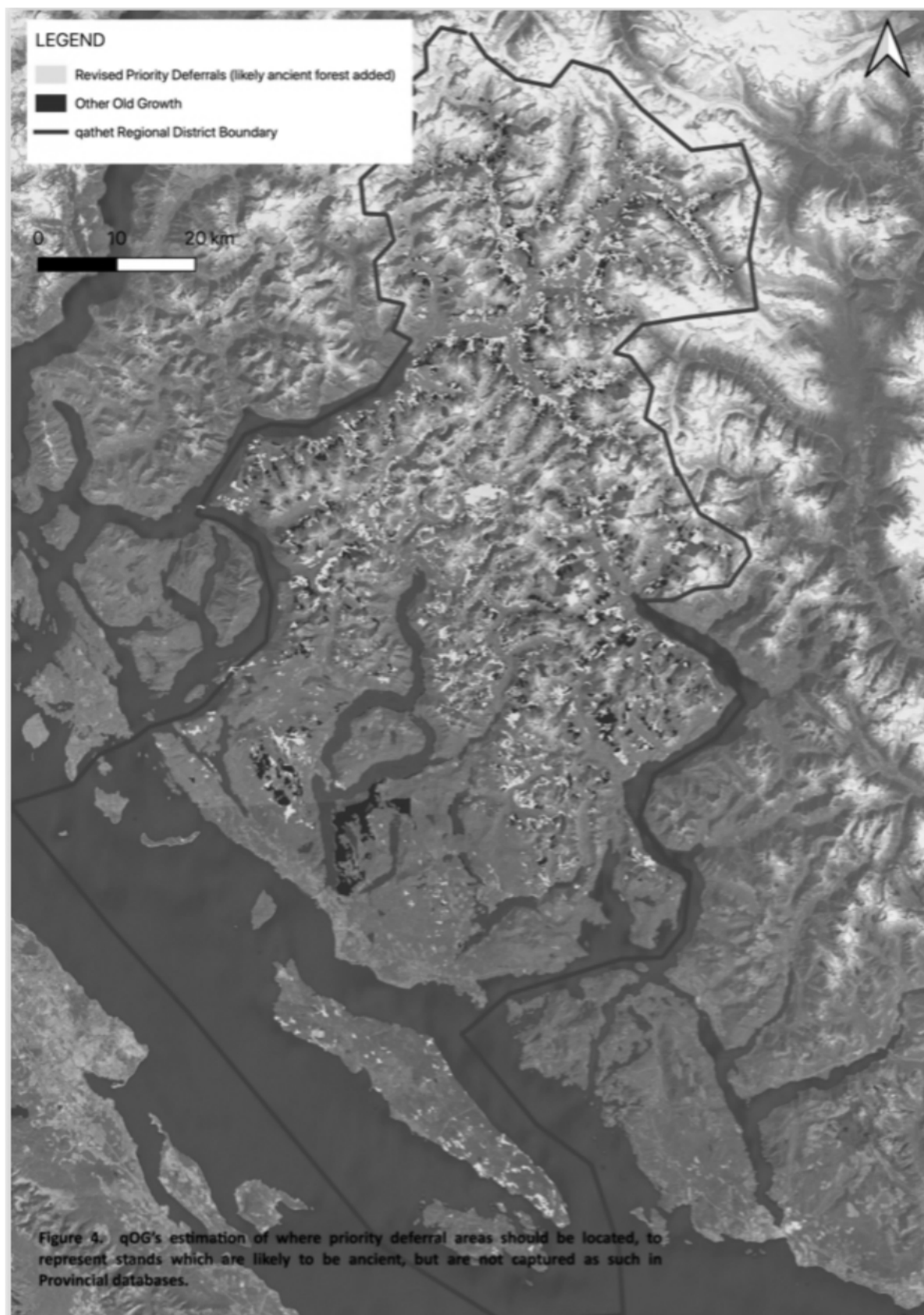
⁴ Which was based on Province of BC 2010. BC Land Management Handbook #25. Structural stage 7b. NDT 1, 2 and 4 for less frequent disturbance.

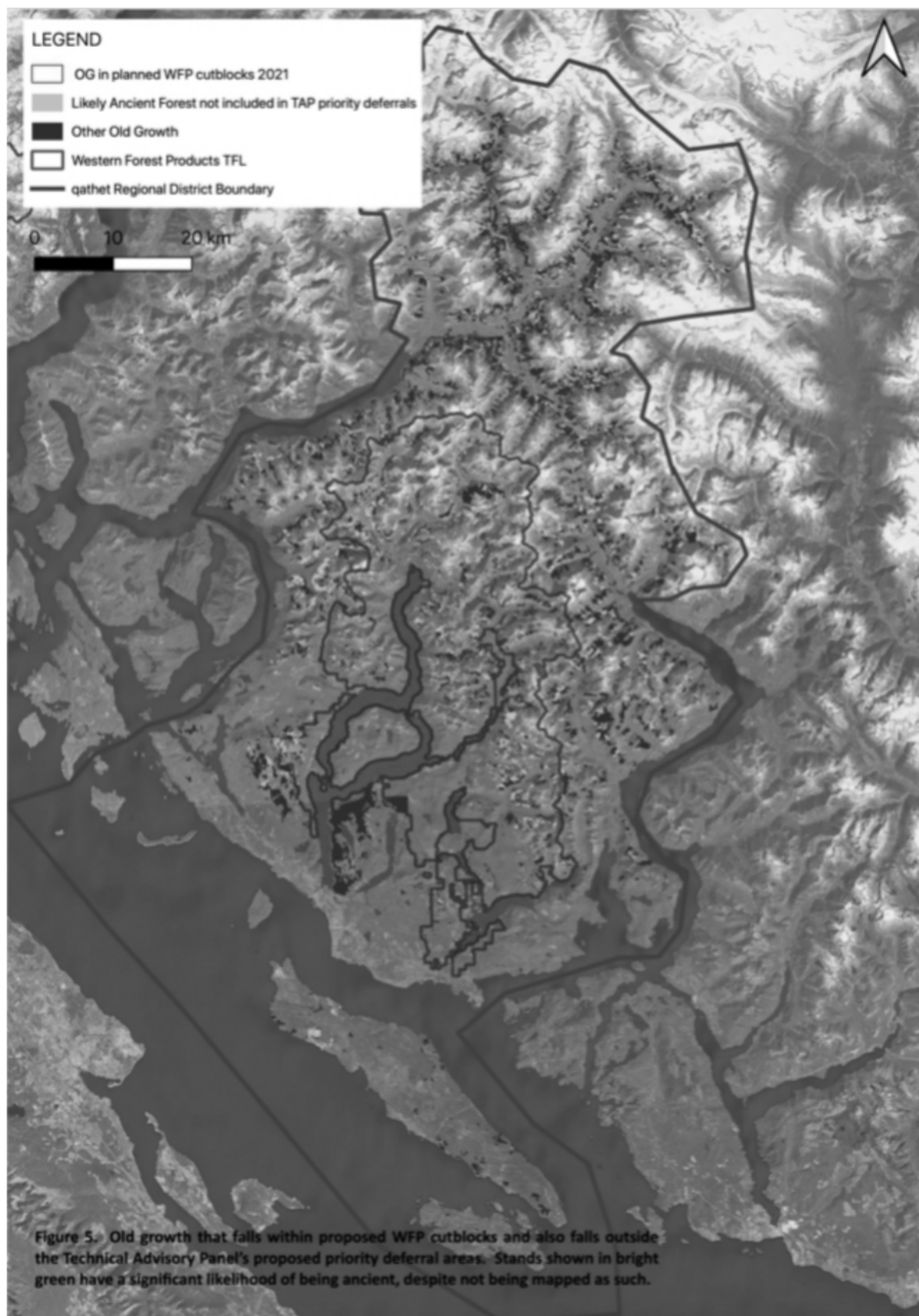
⁵ [Millenia-old cedars felled on Mount Freda \(May 2021\)](#)

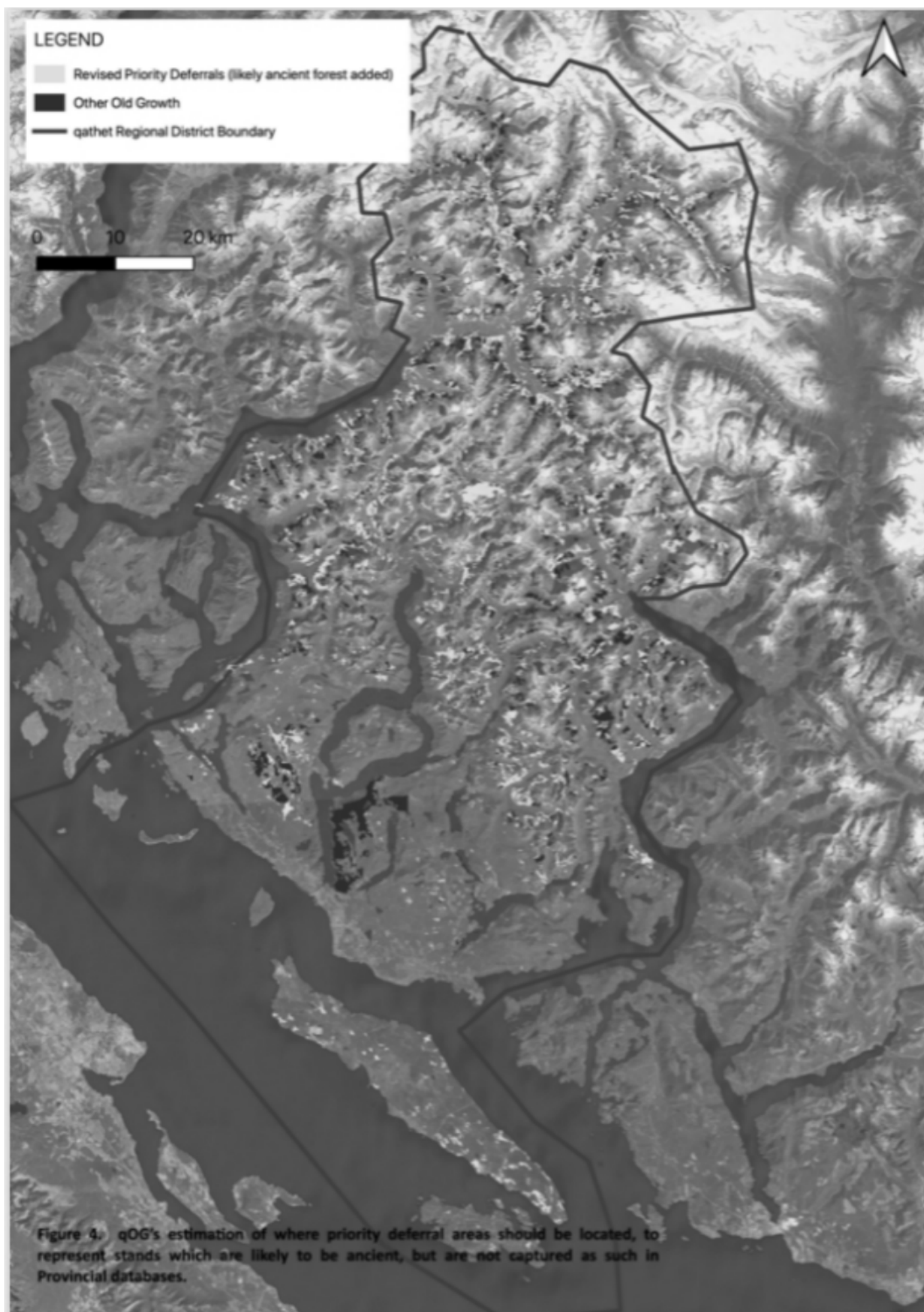


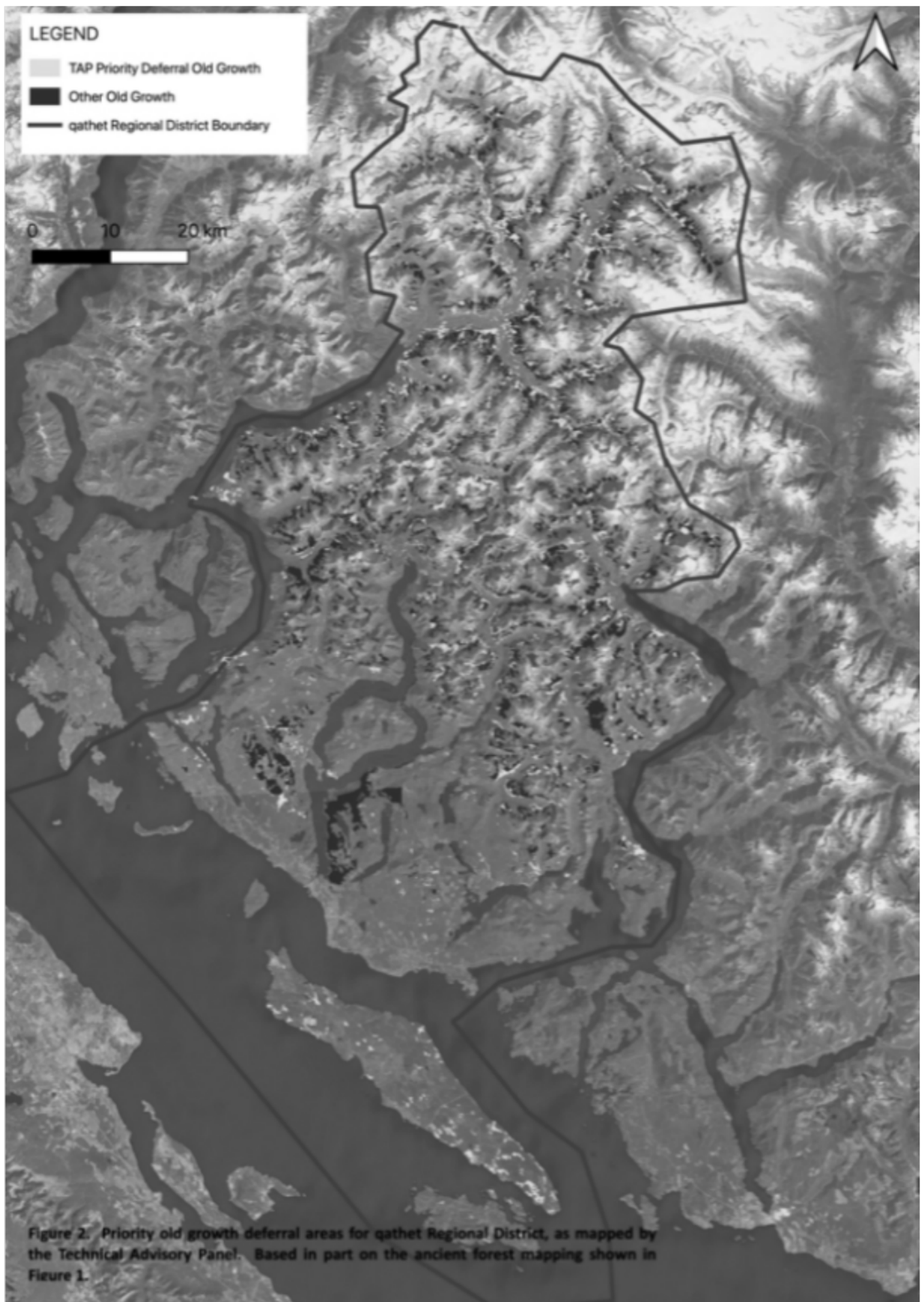












Box 1. Reasons for concern about TAP's ancient forest and priority deferral area mapping in qathet Regional District:

1. In qathet Regional District, most of the remaining Big Tree Old Growth) is located in wetter and higher elevation areas (i.e. the CWHvm and MHmm biogeoclimatic subzones) due to extensive historic logging in lower elevations, coastal areas, and along valley bottoms.
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3. Consequently, in qRD the ages of many remaining big tree old growth stands in the CWHvm and MHmm BEC subzones of would be expected to be ancient (400+ years old), particularly those stands in the MHmm subzone, where trees are slow growing and small for their age (and hence are often many hundreds of years old before reaching a harvestable size). This is depicted by Figure 3, in which we highlight higher elevation big tree stands in the CWHvm and MHmm zones labelled as 300+ years old in the VRI, which we believe are likely to actually exceed 400 years of age.
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¹ Lertzman, K., D. Gavin, D. Hallet, L. Brubaker, D. Lepofsky and R. Mathewes. 2002. Long-term fire regime estimated from soil charcoal in coastal temperate rainforests. *Conservation Ecology* 6(2): 5.

<http://www.consecol.org/vol6/iss2/art5>

² Price, K., R.F. Holt and D. Daust (2020). *BC's Old Growth Forest: A Last Stand for Biodiversity*.

³ Jones, P. (2003). *Caren Range Ancient Forest*. Paper submitted to the XKK World Forestry Congress, 2003, Quebec City, Canada. <https://www.fao.org/3/XII/0081-B1.htm>

⁴ Which was based on Province of BC 2010. BC Land Management Handbook #25. Structural stage 7b. NDT 1, 2 and 4 for less frequent disturbance.

⁵ *Millenia-old cedars felled on Mount Freda (May 2021)*

FW: Old Growth Impact Analysis

From: Diane.Nicholls@gov.bc.ca
To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>, O'Donoghue, Eamon G FLNR:EX <Eamon.ODonoghue@gov.bc.ca>, Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Sent: November 25, 2021 7:57:39 AM PST

FAIB is getting into difficult situations with requests and not being able to share? Please read below - can we discuss as this has direct impact to staff. From what I understand of the requests, I agree with Albert but if I am missing something, we need to find a way to alleviate the pressures

Diane Nicholls, RPF
Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

-----Original Message-----

From: Nussbaum, Albert F FLNR:EX <Albert.Nussbaum@gov.bc.ca>
Sent: November 24, 2021 5:46 PM
To: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
Subject: RE: Old Growth Impact Analysis

Diane

As I mentioned this morning, I am getting many requests for FAIB impact assessments of the panel's ^{s.12; s.13} old-growth layer both internally and externally (see example below). David is suggesting that it was prepared in cabinet confidence and as such, it should not be released. I think that those assessing the layer should be informed of the impact of adopting the layer. I think a discussion between David and yourself might be warranted here.

Thanks Albert

-----Original Message-----

From: Mark Tamas <Mark.Tamas@tolko.com>
Sent: November 21, 2021 8:54 AM
To: Nussbaum, Albert F FLNR:EX <Albert.Nussbaum@gov.bc.ca>
Subject: Old Growth Analysis

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

I hope you are well.

I have been informed that a preliminary assessment of the potential impact to the AAC of each TSA has been completed by the OCF.

I am aware that it will need to be reassessed when the proposed deferrals that are supported by First Nations are known.

Recognizing that this process will take some time I would like to request these preliminary analysis.

Tolko would like to adequately respond to questions regarding from Indigenous Nations, certification bodies and stakeholders while the licencees continue to harvest at the approved AAC despite knowledge of these deferrals.

This will also provide forest professionals direction with respect to the expectations of the Office of the Chief Forester.

Respectfully,

Mark

Sent from my iPhone

Sent from my iPhone

FW: op ed from Ray Ferris of west fraser

From: Diane.Nicholls@gov.bc.ca
To: Muter, David FLNR:EX <David.Muter@gov.bc.ca>, Hrycuik, Lorie FLNR:EX <Lorie.Hrycuik@gov.bc.ca>, Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>, Sanderson, Melissa FLNR:EX <Melissa.Sanderson@gov.bc.ca>
Sent: November 30, 2021 12:57:43 PM PST
fyi

Diane Nicholls, RPF

Assistant Deputy Minister, Chief Forester
BC Provincial Government
"Caring for BC's Forests"

FYI

British Columbia is blessed with rich natural resources, including an abundant timber supply. As the CEO of the largest producer of renewable building products in the world, I am proud to call B.C. home to our company that was founded in 1955 by the Ketcham brothers near Quesnel.

West Fraser operates 11 production facilities in the interior of the province, manufacturing dimension lumber, pulp, plywood, and medium-density fiberboard (MDF). We generate electricity from wood residuals to power our mills, and two of our locations provide 12 megawatts of power each to BC Hydro to supply residential customers.

Our business in B.C., the 3,000 people we directly employ, and the interior communities we call home are directly impacted by the Government of B.C.'s decision to defer forest operations in areas deemed as "old growth" by a panel appointed by government.

Initial coverage of government's announcement paid particularly close attention to the environmental aspects of the decision, the effect it might have on protesters at Fairy Creek, and much less attention to the potential impact to families, communities, and First Nations. Some mistakenly suggested coastal areas and Vancouver Island would bear the impact, but they are not alone—the effects will be felt right across the province.

Old growth should be protected and for the most part, in B.C. already is. I fully support identifying and protecting ancient trees and remnant forests and adding them to the 3.5 million hectares of old growth already protected in the province.

When you think old growth, you likely conjure up an image of a giant old fir, perhaps as large as three meters across. Curiously, the province's policy goes well beyond grand, old trees and contemplates protection of much smaller, younger trees that have just reached maturity.

Globally, we face a climate crisis. Countries gathered earlier this month at COP26 in Scotland to talk about urgent action necessary to address this challenge. Forests were recognized for being an important part of the solution. Forests provide the air we breathe, act as carbon sinks, and can yield products that store carbon for centuries. Forests really do matter.

B.C. is well positioned to lead the world in providing renewable wood products that can displace concrete and steel across the globe. Our practices and products are responsibly sourced, meet the highest environmental standards, are third-party certified, and are the right choice for consumers who truly care about sustainability and the planet.

But we require a working forest to fulfill that role.

So, what does government mean when it says 4,500 jobs will be impacted by its old growth decisions? It means the loss of high-paying, family-supporting jobs. It means families moving away from communities to urban areas in search

of work. It typically means the collapse of local real estate markets and the destruction of family savings. It means school closures.

Our governments like to talk about how they will create "green" jobs. Instead, B.C.'s forest minister predicted it would eliminate 4,500 green jobs; those held by people who survey, plan, harvest, plant, and tend to our forests and those who manufacture renewable forest products. The industry experts believe it could be 18,000 or more jobs. I am concerned that the Minister is underestimating the impact.

Until now, successive governments have been deft at striking the right balance. Government could have chosen a path that would allow the province to maintain its position as a world leading producer of renewable building products, while celebrating the fact that it already protects and enjoys some of the largest, richest old growth forests in the world.

Rather than strike that balance, government chose a different path, making it clear where they stand.

By contrast, I, like many others, stand with our employees and other hard working forest sector workers and their families, along with the thriving communities they have helped build.

British Columbians should mourn the loss of these green jobs, and the lost opportunity for B.C. to be a world leading producer of sustainably sourced wood building products.

Ray Ferris is the president and CEO of West Fraser Timber Co. Ltd., which is headquartered in Vancouver and currently has operations in Quesnel, Williams Lake, Smithers, Chetwynd, Fraser Lake, and 100 Mile House.

Fwd: INPUT REQUIRED: Dec 16 JCWG Meeting

From: Nicholls, Diane R FLNR:EX <Diane.Nicholls@gov.bc.ca>
To: Manwaring, Richard G FLNR:EX <Rick.G.Manwaring@gov.bc.ca>
Sent: December 9, 2021 9:10:40 AM PST
Attachments: 2 November 16 2021 JCWG Meeting Record DRAFT.docx, image001.jpg, image001.jpg
Any info?

Sent from my iPhone

Begin forwarded message:

From: "Schafthuizen, Jim FLNR:EX" <Jim.Schafthuizen@gov.bc.ca>
Date: December 9, 2021 at 9:09:14 AM PST
To: "Nicholls, Diane R FLNR:EX" <Diane.Nicholls@gov.bc.ca>
Subject: INPUT REQUIRED: Dec 16 JCWG Meeting

Hi Diane. Further to our discussion about the JCWG agenda next week, Dana Holtby has reached out again (note below) and identified that FLNRORD committed to an old growth strategy follow-up at the December meeting. I'm not certain what was envisioned and you may want to raise this in your briefing with Rick today. Let me know so I can get back to Dana Holtby.

Jim Schafthuizen

Executive Director
Forest Policy & Indigenous Relations Division
Ministry of Forests, Lands, Natural Resource Operations
& Rural Development
Phone – (250) 320-9198 (cell)

From: Holtby, Dana IRR:EX <Dana.Holtby@gov.bc.ca>
Sent: December 9, 2021 8:56 AM
To: Schafthuizen, Jim FLNR:EX <Jim.Schafthuizen@gov.bc.ca>
Subject: RE: INPUT REQUIRED: Dec 16 JCWG Meeting

Hi Jim,

Just checking in to see if there is an update from FLNR for the upcoming JCWG meeting?

I've attached here the November meeting's Record of Decisions. It includes a commitment from FLNR to set up a session between FNLC and FLNRO on land use planning and to add Old Growth FNLC-FLNRO meeting follow-up to the next JCWG meeting.

We have flagged the Old Growth discussion in the agenda for the upcoming December 16th meeting as follows:

Sector Updates: Forestry, Children and Families

0. Forestry – **SPEAKER TBD BY FLNR**

- Committed at Nov 17th JCWG to circle back to Old Growth Strategy at December JCWG meeting.

Please let me know if there are concerns or additions.

All the best,
Dana

From: Schafthuizen, Jim FLNR:EX <Jim.Schafthuizen@gov.bc.ca>
Sent: December 6, 2021 10:39 AM
To: Holtby, Dana IRR:EX <Dana.Holtby@gov.bc.ca>
Subject: RE: INPUT REQUIRED: Dec 16 JCWG Meeting

Hi Dana. We haven't had our internal call yet to determine who or what the update will be. I will get back to you as soon as I know.

Jim Schafthuizen, R.P.F.
Executive Director
Forest Policy & Indigenous Relations Division
Ministry of Forests, Lands, Natural Resource Operations
& Rural Development
545 Superior Street, Victoria B.C.
Phone – (250) 320-9198 (cell)

From: Holtby, Dana IRR:EX <Dana.Holtby@gov.bc.ca>
Sent: December 6, 2021 9:46 AM
To: Schafthuizen, Jim FLNR:EX <Jim.Schafthuizen@gov.bc.ca>
Cc: Sanderson, Melissa FLNR:EX <Melissa.Sanderson@gov.bc.ca>
Subject: FW: INPUT REQUIRED: Dec 16 JCWG Meeting
Importance: High

Hi Jim,

I missed the FLNR representative on my email. You do, or a member of your team have an update you can provide for the upcoming JCWG meeting?

Thanks so much,
Dana

From: Holtby, Dana IRR:EX
Sent: December 2, 2021 12:34 PM
To: Grieve, Richard IRR:EX <Richard.Grieve@gov.bc.ca>; Lawson, Robert IRR:EX <Robert.Lawson@gov.bc.ca>; Nicholson, George AG:EX <George.Nicholson@gov.bc.ca>; McCarthy, Tom IRR:EX <Tom.McCarthy@gov.bc.ca>; Devenny, Denise MCF:EX <Denise.Devenny@gov.bc.ca>; Eckardt, Dana R ENV:EX <Dana.Eckardt@gov.bc.ca>; Chan, Debbie AG:EX <Debbie.Chan@gov.bc.ca>; Leece, Robert IRR:EX <Robert.Leece@gov.bc.ca>
Cc: Arthur, Emily IRR:EX <Emily.Arthur@gov.bc.ca>; Mathieson, Lauren IRR:EX <Lauren.Mathieson@gov.bc.ca>; Walker, Leah MCF:EX <Leah.Walker@gov.bc.ca>; Grimes, Melissa IRR:EX <Melissa.Grimes@gov.bc.ca>
Subject: INPUT REQUIRED: Dec 16 JCWG Meeting
Importance: High

Hello everyone,

Please find attached a draft annotated agenda for the Thursday December 16 JCWG meeting.

MIRR has a pre-pre-brief scheduled with ADM Wood on Tuesday December 7th. The pre-brief is scheduled with ADMs/DMs on Friday December 10.

For each agenda item we've tagged a ministry lead, who can **please provide annotations** and **any relevant meeting materials** that should be included in the meeting package, indicating whether it's for BC only (i.e. internal), or both FNLC/BC (i.e. shared).

Please provide your annotations and materials to me as soon as possible, and by end of day Friday at the very latest.

Please note that we are aware that the pace of work is moving quickly on some agenda items; please do your best on the annotations, and be in touch if they need to change before the meeting.

Thanks so much,
Dana

Dana Holtby (Pronouns: They/Them)
Senior Policy Analyst
Reconciliation Transformation and Strategies Division
Ministry of Indigenous Relations and Reconciliation

Phone: (236) 478-4114
Email: dana.holtby@gov.bc.ca

I acknowledge with gratitude that I live and work on the traditional territories of the lək'wəṇən people including the Songhees and Xwsepsum (Esquimalt) Nations.

Joint Core Working Group Meeting Record
November 16, 2021 – 10:00am-12:00pm

Chair: Andrea Glickman

Attendees

Province		FNLC	
Doug Caul, DM	MIRR	Mary Ellen Turpel-Lafond, Legal Counsel	UBCIC
Allison Bond, DM	MCFD	Merle Alexander, Legal Counsel	BCAFN
Rick Manwaring, DM	FLNROD	Andrea Glickman, Policy Director	UBCIC
Richard Fyfe, DAG	AG	Nick Smith, Legal Counsel	BCAFN
Paul Craven, A/ ADM	AG	Jaime Sanchez, Senior Advisor	BCAFN
Jessica Wood, ADM	MIRR	Harmony Johnson, Consultant	FNLC
Tom McCarthy, A/ADM	MIRR	Maureen Buchan, Senior Policy Advisor	BCAFN
Dana Holtby, A/Sr. Policy Analyst	MIRR	Stacey Edzerza Fox, Legal Counsel	FNS
Melissa Sanderson, ADM	FLNR	Dawn Johnson, Senior Policy Analyst	UBCIC
Denise Devenny, ADM	MCFD	Leslie Loubert, Executive Assistant	UBCIC
Richard Grieve, Executive Lead	MIRR		
Robert Leece, Executive Director	MIRR		
Debbie Chan, Senior Legal Counsel	AG		
Melissa Grimes, Director	MIRR		
Sara Pye, Director	MIRR		
Roshan Danesh, Consultant	MIRR		
Paul Yearwood, Supervising Solicitor	AG		

November 16, 2021 Decisions and Actions

Item	Decisions and Actions	Status
October 21 Meeting Record	October 21, 2021 Meeting Record approved	N/A
Secretariat	FNLC to bring forward issues identified regarding Secretariat regulations to the next JCPT meeting	JCPT on November 18, 2021
Section 3 Dialogue	Identify dates and sequencing for focus groups as recommended in the section 3 expert forum paper, as well as priority statutes for alignment of laws efforts	ASAPIn progress
	FNLC and BC to provide any final commentary for the expert forum report and infographic to prepare for public release	By next JCWGIn progress
Interim Process	FNLC to provide written comments to the infographic / diagram	ASAPIn progress
	Book separate discussion on FNLC outline for Declaration Act plenary sessions and whether the interim process diagram can be included in the package	ASAPDeferred
Non-Derogation	N/A	
Section 7	BC to send letters to First Nations with an update and to offer meetings to discuss the policy approach	Week of November 15, 2021

Commented [AE1]: Status update required from AG

Item	Decisions and Actions	Status
Implementation Legislation	FNLC and BC to discuss approach to FNLC plenary session on section 7 agreements	ASAP <u>Deferred</u>
	BC to provide stakeholder engagement plan for s7 agreements and any updated three-column document	Prior to November 18, 2021 s7 meeting
Declaration Act Action Plan s.14	Jessica and Harmony to set up time to review incoming input / responses from Ministries	In progress
Forestry	Set up a session between FNLC and FLNRO on land use planning	ASAP
	Add Old Growth FNLC-FLNRO meeting follow-up to the next JCWG meeting	December 16, 2021
First Nations Leadership Gathering	BC to provide response to FNLC outline for Declaration Act plenary sessions	ASAP <u>Deferred</u>
Next Meeting	Next JCPT meeting is Thursday, November 18, 2021 from 2:00pm-3:00pm Next JCWG meeting is Thursday, December 16, 2021 from 9:30am-11:30am	N/A

Commented [AEI2]: Status update required from NROD (Tom/Robert Leece)

Commented [AEI3]: Status update required from NROD (Tom/Robert Leece)

Commented [AEI5]: Status update required from FLNRORD

JCWG Meeting October 21, 2021 (Pending Action Items)

Item	Decisions and Actions	Status
Distinctions-Based Guidance	MIRR to provide FNLC with a revised Distinctions-Based Guidance document	In Progress – MIRR collaborating with Roshan Danesh on next iteration
Forestry	FLNR and FNLC will set up a meeting to further discuss Modernizing Forest Policy – Intentions Paper	Pending – dates have been offered to FNLC, waiting for response
Children and Families	MCFD and FNLC will work through the Tripartite Children and Families Working Group to determine a proposed approach (e.g. technical table or working group) to exploring appropriate engagement and communications with rights and title holders, and will return to JCWG to gauge interest in FNLC participation	Draft engagement plan developed by MCFD and shared with FNLC for input

Commented [AEI7]: Status update required from FLNRORD

Commented [AEI8]: Status update required from MCFD

Page 77 of 87

Withheld pursuant to/removed as

s.12 ; s.13 ; s.22

Page 78 of 87 to/à Page 87 of 87

Withheld pursuant to/removed as

s.12 ; s.13