Guidelines for Stewardship/Timber Harvesting Landbase Stabilization Projects

June 16, 2015

Office of the Chief Forester
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**Guidelines for Stewardship/Timber Harvesting Land Base Stabilization Projects**

**Introduction**

The Forest Competitiveness Initiative has identified the *Provincial Stewardship/Timber Harvesting Land Base (THLB) Stabilization Project* as an opportunity to enhance competitiveness for the forest sector in the short term. This joint collaboration between Industry and Government is an opportunity to improve stewardship and economic activity while optimizing constraint objectives on the timber harvesting land base.

**Background**

The Forest and Range Practices Act [FRPA], Crown Land Act, and associated regulations dictate forest management on provincial Crown land and require the development of Forest Stewardship Plans with results or strategies to meet government objectives for 11 resource values.¹ Outcomes from these tools are used to manage and protect these values when undertaking forestry activities, including the establishment of Ungulate Winter Ranges (UWRs), Wildlife Habitat Areas (WHAs), Old Growth Management Areas (OGMAs), riparian reserves (RRs), visual quality areas (VQAs), resource features, recreation areas, and cultural areas. Alternative harvesting techniques can also be applied to protect these values.

The impacts from the mountain pine beetle infestation, demands from other resource-based industries and the need to designate habitat for Species at Risk (SAR) are affecting the amount of land available for timber harvesting. Forest licensees, BC Timber Sales and potential new forest industry entrants require operating area and fibre supply certainty to support their businesses.

The Timber Supply Review (TSR) ensures an appropriate allowable annual cut (AAC) for timber harvesting in each management unit in B.C., through a THLB net down process of legally designated areas. A Stewardship/THLB stabilization project may result in an increased timber supply. The Chief Forester’s (CF’s) office will consider the impacts this would have on the AAC.

However, in light of mounting land base pressures, the Provincial Forestry Forum (PFF) and regional Operational Issues Forums (OIF) have sponsored some pilot projects that have used the existing tools, but applied them to the land-base in different ways. The intent is to optimize the placement of forest stewardship reserves while minimizing impacts on and providing more stability to the THLB. Early findings indicate that spatializing and co-locating the different stewardship designations, including cultural features, where appropriate, has resulted in more

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¹ The new results-based *Forest and Range Practices Act* (FRPA) identifies 11 key forest and environmental values that must be maintained including: Biodiversity, Cultural heritage, Fish/Riparian/Watershed, Forage and Associated Plant Communities, Recreation, Resource Features, Soils, Timber, Visual Quality, Water, and Wildlife. [www.for.gov.bc.ca/hfp/frep/values](http://www.for.gov.bc.ca/hfp/frep/values)
unified or contiguous areas for reserves and THLB. These pilots have been endorsed for completion by the PFF and are now part of the project.

**Project Goals and Objectives**

There are two main goals for the Stewardship/THLB Stabilization Project:

1. To improve stewardship and economic forest activity; and
2. Optimize stewardship objectives while minimizing impacts to the THLB.

In order to achieve the main goals of the Stewardship/THLB Stabilization Project, this document was created with the following objectives:

1. Reiterate the guiding principles for the Stewardship/THLB stabilization project;
2. Provide guidelines for the development and implementation of a Stewardship/THLB stabilization project;
3. Provide a summary of current and ongoing Stewardship/THLB stabilization project work (Appendix B) including: screening, analysis methods, evaluation, approval, and implementation.

**Guiding Principles**

The following guiding principles must be considered when putting together a project proposal:

1. **No changes to land use plans, existing legislation or regulations** – There will be no changes to government objectives in existing strategic land use plans. Policy will be used to implement project recommendations as opposed to changing existing legislation or regulations.
2. **Early stakeholder engagement** – Early engagement of First Nations, Ministry staff (e.g. Regional biologists and other domain experts), and other resource stakeholders (e.g. trappers, mining and mineral exploration) is critical in order to clarify project objectives, seek input, provide timely review, and incorporate feedback.
3. **Integrated approach and comprehensive analysis** – An integrated approach that supports co-location and contiguous establishment while still meeting the requirements of multiple values on the land base that provides the equivalent or greater ecological benefits and stabilization of the THLB.
4. **Set evaluation criteria** – Projects will establish criteria to evaluate alternative land use configurations that meet both stewardship and THLB goals.
5. **Linkages to other initiatives** - Projects will recognize and incorporate the work of other initiatives and avoid duplication of effort. Initiatives linked to these guidelines include:
   - Existing strategic land use plans;
• Species at Risk Management (SAR), including Identified Wildlife Management System (IWMS) initiatives; and
• Integrated Silviculture Strategy.

Each of these initiatives is summarized briefly, with contact information and references in Appendix A.

6. **Timely evaluation** – A screening process will evaluate and prioritize projects so that resources are assigned and evaluation completed in a timely fashion.

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**Guidelines for Timber Harvesting Stabilization Projects**

Following is a description of the steps for the submission, screening, analysis, evaluation and implementation of stewardship/timber harvesting stabilization projects. A high level summary flowchart is outlined in Figure 1.

1. **Screening**

Project screening will occur under the direction of the Regional Executive Directors (REDs) in each of the three Regions once proponents have submitted proposals for potential projects. Submitted projects can be at any scale: watershed, landscape unit, or management unit (including tree farm licenses, timber supply areas) where there are data and analysis available.

As part of their submissions, proponents will conduct an initial screening exercise to identify opportunities and determine whether or not the project is likely to yield benefit before beginning a detailed analysis. The screening exercise consists of the following:

1. **Identify Scale:**
   • Identify the scale of the project, e.g. watershed, landscape unit, management unit.
   • Recognize that scale influences the analysis required and the evaluation criteria employed.

2. **Documentation Review:**
   • Review TSR documents to identify net downs, constraints (opportunities). Has there been a decrease in AAC for a given unit and why?
   • Review strategic land use plans to identify ecological issues and management unit objectives;
   • Review necessary background planning documents and Orders established through government actions regulation (GAR);
• Review and incorporate relevant information from Multiple Resource Value Assessment (MRVA)\(^2\).

3. **First Nations Engagement:**
   - Review and incorporate existing FN stewardship agreements\(^3\).
   - Consult with First Nations (FN) staff to clarify objectives of numerous reserves/constraints. Identify and clarify any issues or opportunities arising from findings, including an evaluation of FN acceptance of changes.

4. **Consideration of Location Knowledge:**
   - Consult with regional biologists, company planners, engineers, and any other experts to clarify objectives of numerous reserves/constraints.

5. **Clarification:**
   - Identify and clarify any issues or opportunities arising from the findings.

6. **Preliminary GIS exercise:**
   - Assemble GIS mapping layers needed to conduct an assessment and produce summaries.

7. **Reporting:**
   - Generate project proposal report with rationale.

**2. Regional Project Shortlist**
Submitted projects will be evaluated by the regional executive director (RED) who will select the top three projects by Region (Northern Interior, Southern Interior, and Coast), for a total of nine project submissions.

**3. Multiple Objectives Matrix Analysis**
Each project proponent will conduct a multiple objectives matrix analysis for the proposed project. It will be used to evaluate the degree to which current landscape reserves overlap for an area, and to assess potential opportunities for further co-location of constraints. This analysis will be reviewed by Forest Analysis and Inventory Branch (FAIB).

This analysis technique was used in the Lakes Timber Supply Area, Mid-term Timber Supply. Following this analysis, it will be determined whether the gain is significant enough to make the co-location project worthwhile and where.

\(^2\) The Multiple Resource Value Assessment (MRVA) is a summary of available field-based assessments of the conditions of these values. Most of the information is focused on the ecological state of the values and provides useful information to resource managers and professionals on the outcomes of their plan and practices. For more information: [https://www.for.gov.bc.ca/hfp/frep/publications/mrva.htm](https://www.for.gov.bc.ca/hfp/frep/publications/mrva.htm)

\(^3\) An example of a relevant existing First Nations Stewardship Agreement is the Government to Government (G2G) framework agreement with Carrier Sekani FN in the Omineca Region.
4. Project Prioritization by Regional Operational Issues Forum (OIF) and Report Out to Provincial Forestry Forum (PFF)

Following the results of the optimization matrix analysis review, projects will be reviewed and prioritized by the regional Operational Issues Forum (OIF). One (1) project will be chosen from each Area for implementation by the Ministry, from the forwarded submissions. Following regional OIF project approval, proponents conduct a detailed analysis. There may be additional opportunity for industry lead projects assuming the resources are available as will be identified at the OIF.

Approved projects will be reported to the Provincial Forestry Forum (PFF). The Forum will monitor each project until completion.

5. First Nations Consultation

Project proponent will provide the project proposal to First Nations and stakeholders for early review and comment.

6. Detailed Analysis

At this step, a detailed analysis would be conducted that includes:

a. **Early engagement of specialists**: Habitat specialists and other domain experts will be consulted regarding potential for rationalizing constraint areas and scenario evaluation criteria. They will also be engaged following the analysis at the evaluation phase.

b. **Identify Evaluation Criteria**: The identified evaluation criteria are the parameters that will be used to evaluate whether or not ecological values are maintained. They also define the potential for achieving the project objectives and determine whether an improvement is made in co-locating the constraints. Evaluation criteria will need to be established and will be unique to each project. Identify what the initial assessment parameters are for a given project. Some of these will be standard and some of these will be unique for a given project. A summary of example evaluation criteria has been provided in Appendix C.

c. **Modelling and summaries**: Model the necessary timber and ecological indicators, including temporal spatial outputs. Provide summaries of scenario results that include key timber and ecological indicators.

d. **Identify anchor points**: Identify habitat (e.g. nest sites) or cultural features that represent anchor points for constraint areas.
e. **Identify and summarize overlapping constraints:** Locate timber harvesting constraint areas, identifying those that are single purpose vs. multi-purpose (serve 2, 3, or 4 purposes). Sum up types of constraints by area and volume.

f. **Identify areas of flexibility:** Identify areas where there is flexibility in the location of constraint areas that represent opportunities for relocation.

g. **Evaluate effect on THLB:** Evaluate relative to criteria, the amount of THLB affected. Keep in mind that the goal is to relocate constrained areas to have overlap, without impacting wildlife values and without diminishing ecological opportunities / values.

h. **Ensure spatial distribution:** Evaluate distribution of reconfigured constraint areas to ensure spatial distribution is consistent with established resource objectives and measures.

i. **Iterative refinement:** Review and refine scenarios to reflect input from the project domain specialists, this may include field review;

j. **Final scenario:** Selection of final scenario.

k. **Reporting:** Project report summarizing the methods, scenarios and results, including computed values for evaluation criteria.

l. **Presentation:** Assemble maps and spatial results.

### 7. Evaluation

The proponent will provide the report on the final scenario developed from the detailed analysis to First Nations, Ministry staff, Industry, and other stakeholders for final review and comment. Received comments will be summarized for submission to the regional executive director (RED).

### 8. Regional Executive Director Approval and Implementation

The final submission should include the following:

- Summary of the benefits for all values including percent THLB increase (if there is one);
- Results of assessment and First Nations’ Consultation;
- Determination of changes required to implement in order to put the project into place;

The Regional Executive Director then decides to implement final scenario and the proponent completes a project implementation and communication plan.
Figure 1. Summary of guidelines for timber harvesting land base stabilization projects.
Appendix A – Initiatives linked to Timber Harvesting Land base Stabilization Projects

The Identified Wildlife Management System (IWMS) and Species at Risk Management (SAR)

Description

Identified Wildlife, as under the Forest and Range Practices Act, are divided into two categories: Species at Risk and Regionally Important Wildlife. The goals of the strategy are to minimize the effects of forest and range practices on Identified Wildlife situated on Crown land to maintain their limiting habitats throughout their current ranges and, where appropriate their historic ranges. Current government policy has set a limit of one percent of the allowable impact to short-term harvest levels that may be incurred as a result of implementing measure for Identified Wildlife.

Guiding principles have been identified for updating the IWMS to accommodate increased communication, more adaptive management and expansion of SARA species. IWMS is a component of the SAR five-year plan and will be informed by other components of the five-year plan.

Following is a brief summary of the steps:

1) Assemble designation objectives for planning area;
2) Determine habitat objectives in parks and protected areas;
3) Co-locate with existing designations;
4) Adjust existing designations to improve co-location efficiency;
5) Locate habitat objectives outside of high value timber areas;
6) Locate remaining habitat objectives;
7) Adjust for harvest logistics;
8) Decision maker approval of new and adjusted designation polygons.

Contact

Andy Witt, Manager of Habitat Management Section, Resource Management Objectives Branch.

References


**Integrated Silviculture Strategy**

**Description**

The ISS (formerly known as IRMP) is a sustainable forest management planning framework with the objective to integrate all aspects of landscape-level and operational planning for each Timber Supply Area (TSA). The ISS will integrate Type 4 Silviculture Strategies with TSR.

An ISS pilot project will begin in the Arrowsmith TSA in conjunction with an ongoing TSR. The objective is to build an IRMP for the TSA over the next two and a half years and then apply the experience to other TSAs in the future.

The Arrowsmith TSA was chosen for the pilot because it has a highly constrained land base, making it difficult for licensees to find volume for their five-year plans. As well, IWMS reserve allocations are at or above initial targets, making it a prime candidate for co-location.

Linkages between the ISS terms of reference and THLB Stabilization Projects include the co-location of SAR and other ecological reserves. Once the ISS Arrowsmith TSA Draft Situation Analysis is finalized, there will be more details regarding numbers, locations and types of reserves to be co-located.

**Contact**

Paul Rehsler, Resources Practices Branch.  Paul.Rehsler@gov.bc.ca

**References**


### Appendix B – Timber Harvesting Land base Project Summary of Current and Ongoing Work.

<table>
<thead>
<tr>
<th>Current Pilot Projects</th>
<th>Potential Pilot this Fiscal</th>
<th>Project Linkages</th>
<th>New and Additional Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Prince George TSA</strong></td>
<td>Northern Interior Region</td>
<td>The Identified Wildlife Management System (IWMS) and Species at Risk Management (SAR)</td>
<td>To Be Determined.</td>
</tr>
<tr>
<td>Focus - Examination of ways to re-shape the old growth order through 'spatialized' OGMAs without changing its objective.</td>
<td>The Prince George TSA, Old Growth Management Area, Project Work Plan describes a pilot in one unit (A4 mBEC) that identified spatial landscape biodiversity areas (LBAs) with the purpose of identifying and recommending options for improving the management of landscape level biodiversity while improving the mid-term timber supply.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timeline - Completed.</td>
<td>This process has been approved as part of a recruitment strategy submitted by forest licensees and will expand the identification of LBAs into high priority areas across the PG TSA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Will be doing six other pilots. Wider range of values.</td>
<td>Contact: Greg Rawling (Regional Executive Director, North Area) and John Pousette.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Kootenay Lake Timber Supply Area</strong></td>
<td>Southern Interior Region</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scale – Management Unit.</td>
<td>Based on THLB reductions from previous TSRs, three TSAs have been identified in the Southern Interior with the greatest return potential for a THLB Stabilization Project: Golden TSA, Okanagan TSA, and 100 Mile House TSA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Focus - Impact of swapping OGMAs with THLB and increasing both timber supply and ecological indices while keeping the THLB constant.</td>
<td>Contact: Steve Schell (Director, Regional Operations)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timeline – End of September, 2015.</td>
<td></td>
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<tr>
<td>Needs to have development and implementation criteria and review by licensees.</td>
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<tr>
<td>Current Pilot Projects</td>
<td>Potential Pilot this Fiscal</td>
<td>Project Linkages</td>
<td>New and Additional Projects</td>
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<tr>
<td>Contact: Jim Hackett, Council of Forest Industries (COFI) (<a href="mailto:hackett@cofi.org">hackett@cofi.org</a>).</td>
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<tr>
<td><strong>Stella Lake</strong></td>
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<tr>
<td>• Scale – Watershed.</td>
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<tr>
<td>• Focus - Presented a possible solution to a heavily constrained area starting with a &quot;blank page&quot;.</td>
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<tr>
<td>• Timeline - March 31, 2015.</td>
<td></td>
<td></td>
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<tr>
<td>Contact: Bob Craven, Interfor Forest Products Limited (<a href="mailto:Bob.Craven@interfor.com">Bob.Craven@interfor.com</a>).</td>
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<tr>
<td><strong>North Island Identified Wildlife Management Strategy (IWMS) and San Josef Pilots</strong></td>
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<tr>
<td>• Scale – Landscape Unit level.</td>
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<tr>
<td>• Focus – Old Growth Management Area (OGMA) re-design for mainly the San Josef pilot.</td>
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<tr>
<td>• Timeline – June 30, 2015.</td>
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<tr>
<td>• Need integration with BCTS (parallel project). After June 30</td>
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<tr>
<td>Contact: John Deal, Western Forest Products (<a href="mailto:jdeal@westernforest.com">jdeal@westernforest.com</a>).</td>
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<tr>
<td><strong>Coast Region</strong></td>
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</tr>
<tr>
<td>• Potential THLB Stabilization Projects: Sunshine TSA (A&amp;A Trading), TFL 39, Blk 1 Sunshine Coast (WFP).</td>
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</tr>
<tr>
<td>• Bob Craven (InterFor) to follow-up with licensees on results of pilot projects at the next Coast Forest Products Association (CFPA) working group meeting to see if there are any other potential THLB Stabilization Projects.</td>
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<tr>
<td>• The Chilliwack and Squamish Districts have suggested there may be less potential for THLB Stabilization Projects due to their smaller licensee base (less capacity for strategic planning) and diligent work in co-location during the original establishment.</td>
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<td></td>
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<tr>
<td>Contact: Andrew Ashford (District Manager, North Island Central Coast Natural Resource District)</td>
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</tr>
<tr>
<td><strong>Integrated Silviculture Strategy, Arrowsmith TSA</strong></td>
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<tr>
<td>Formerly called the Integrated Resource Management Plan.</td>
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<tr>
<td>Contact: Paul Rehsler, (Resources Practices Branch).</td>
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</tbody>
</table>

Table 1. Timber Harvesting Land base Stabilization Summary of Current and Ongoing Work.
Appendix C – Evaluation and Ranking Criteria

When configuring landscape reserve areas for multiple objectives, a number of parameters can be used to evaluate resource values in order to select high-quality areas. Typically these include parameters describing First Nations cultural resources (Cedar volume and cultural values), wildlife habitat, hydro-riparian areas, visual resources or other locally important values.

The following is an example of the parameters used to measure the success of newly designated old growth management areas (OGMAs) in a landscape unit within the West Coast Region. These parameters are designed to represent a range of values including those more unique to the landscape unit.

Gross Area
- Total area conserved within the OGMA

Productive Forest
- The productive forest area (as classified in the Vegetation Resource inventory) within the OGMA stratified by stand age class

Timber Harvesting Land Base
- The THLB area (defined in timber supply analysis supporting the current AAC for the area) within the OGMA stratified by stand age class

First Nations Value
- Cultural features measured by the number of known features conserved in the OGMA
- Cultural cedar measured by the volume of cultural cedar trees in the OGMA

Interior Forest
- Interior forest was defined as the area within productive forest that is not within 100 metres from a road right-of-way or the edge of a cutblock less than 20 years old

Marbled Murrelet
- Murrelet habitat area classified in low-level aerial reconnaissance using Ranks 1 to 3 inclusive conserved in the OGMA
- Marbled murrelet nesting habitat (Ranks 1 to 3) overlapping interior productive forest

Northern Goshawk
- The area of nesting and foraging habitat in the OGMA using habitat classification from the 2012 goshawk nesting and foraging models completed by the Northern Goshawk Recovery Team
Ungulate Winter Range
- The total area of designated ungulate winter range conserved in the OGMA

Riparian
- The total riparian management area, including reserve zone and management zone, within the OGMA. Riparian management areas along streams, lakes, and wetlands derived from approved management plans

Potential Rare Ecosystem
- The area of potential rare ecosystems within the OGMA which may contain red or blue-listed ecological communities as defined by the BC Conservation Data Center

Karst
- The area of recreation karst features within the OGMA classified as being high or moderate importance in the FLNR ‘Recreational Karst Inventory’
- The area of karst features within the OGMA as identified in the Ministry of Energy and Mines ‘Geology’ dataset

Visual Quality Objectives
- Total area conserved in OGMA within visual quality classes
- The visual classes considered were Retention, Partial Retention, and Modification (no Preservation in landscape unit)
Appendix D – Multiple Objectives Matrix Analysis Example for the Lakes TSA Mid-term Timber Supply (Forest Analysis and Inventory Branch)

As part of the Mid-term Timber Supply Project, Forest Analysis and Inventory Branch (FAIB) examined the constraints or values being managed in the Lakes TSA to see if there were opportunities to increase the timber supply. A TSA resultant file was created which showed the entire TSA and all the land base categories including the timber harvesting land base (TGLB). This is the usual starting point for any timber supply analysis.

For each value, such as old growth, the TSA file was queried to show how much of the crown forest land base (CFLB) was managed solely for that value, and how much of that value was co-located with other values. The table below shows for the Burns Lake zone the land base managed solely for OGMAs and the areas of other values co-located with OGMAs.

<table>
<thead>
<tr>
<th>Sub-region</th>
<th>Constraint Zones</th>
<th>Area (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BL</td>
<td>ODMA</td>
<td>3,591</td>
</tr>
<tr>
<td>BL</td>
<td>VQO</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Grizzly</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Moose</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Deer</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Caribou</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Corridor</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>VQO</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Grizzly</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Moose</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Deer</td>
<td>X</td>
</tr>
<tr>
<td>BL</td>
<td>Caribou</td>
<td>X</td>
</tr>
</tbody>
</table>

BL = Burns Lake

In the summary table below, the data shows that there are 12,226 hectares of OGMAs in the Burns Lake zone and of that total, 8635 hectares or 70% are collocated with other values. This exercise provides an indication of the extent to which values are already co-located and the potential increase in timber supply if more colocation is possible.

This database exercise also revealed that there were other values of importance to First Nations that were co-located with OGMAs but were not identified in the database.
### Stabilization Projects

<table>
<thead>
<tr>
<th>Sub-region</th>
<th>Constraint zone group</th>
<th>Area (ha)</th>
<th>Timber vol pine (m³)</th>
<th>Timber vol non-pine (m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BL</td>
<td>OGMA_only</td>
<td>3,591</td>
<td>253,472</td>
<td>468,822</td>
</tr>
<tr>
<td>BL</td>
<td>OGMA+others</td>
<td>8,635</td>
<td>865,230</td>
<td>930,815</td>
</tr>
<tr>
<td>NB</td>
<td>OGMA_only</td>
<td>1,459</td>
<td>70,565</td>
<td>224,332</td>
</tr>
<tr>
<td>NB</td>
<td>OGMA+others</td>
<td>2,442</td>
<td>96,573</td>
<td>339,315</td>
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<tr>
<td>SF</td>
<td>OGMA_only</td>
<td>4,428</td>
<td>686,620</td>
<td>349,103</td>
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<tr>
<td>SF</td>
<td>OGMA+others</td>
<td>10,192</td>
<td>1,371,012</td>
<td>818,273</td>
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<tr>
<td>SO</td>
<td>OGMA_only</td>
<td>12,107</td>
<td>1,961,967</td>
<td>626,875</td>
</tr>
<tr>
<td>SO</td>
<td>OGMA+others</td>
<td>18,342</td>
<td>3,271,682</td>
<td>735,632</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>61,196</td>
<td>8,577,121</td>
<td>4,493,167</td>
</tr>
</tbody>
</table>

BL = Burns Lake

NB = North Babine

SF = South Francois

SO = South Ootsa
Appendix E - Summary of Input and Review of the Stewardship/Timber Harvesting Land base Stabilization Guidelines

The Stewardship/Timber Harvesting Land base Stabilization guidelines document was sent out for review and comment in early July. Following is a summary of the comments, responses and any changes to the document that resulted.

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Respondant</th>
<th>Date</th>
</tr>
</thead>
</table>
| BCTS         | BC Timber Sales  
Scott Mitchell, Mike Falkiner, Shawn Hedges, Scott Mitchell, Graham Archdekin | July 2, 2015 |
| CR           | Coast Forest Region  
Heather Chia, Sharon Hadway, Heather MacKnight, Craig Sutherland | July 3, 2015 |
| NIR          | Northern Interior Forest Region  
Greg Rawling, John Pousette, Eamon O’Donoghue, Steve Lindsey, Kevin Kriese | July 3, 2015 |
| SIR          | Southern Interior Forest Region  
| HQ           | Resources Management Objectives Branch  
Andy Witt | May 22, 2015 |
| HQ           | Forest Analysis and Inventory Branch  
Albert Nussbaum, Jim Brown, Atmo Prasad, Tamara Brierley | May 12, 2015 |
| ILMA         | Jim Hackett, Interior Lumber Manufacturers’ Association | May 12, 2015 |

Forest and Range Practices Acts (FRPA) environmental values

SIR:

- The 11 values are not all environmental, including cultural heritage, recreation, timber, and visual quality; misnames several of the items “recreation areas”, “cultural areas” visual quality areas”; misuses the term tool (which is normally reserved for the legal instrument not the outcome); completely misses section 93.4 of the Land Act which is where many designations are made, including OGMAs.

Response:

- Modified wording in guidelines.
Guidelines for Stewardship/Timber Harvesting Land Base

Stabilization Projects

Mountain Pine Beetle (MPB)

SIR:

- States the MPB infestation affects “the amount of land available for timber harvesting”; this is not correct as the MPB does not change the land base only the amount of mature merchantable timber.

Response:

- If it does not meet the minimum harvest volume criteria (areas less economical to harvest), it does reduce the land base available for harvest.

Guiding Principles

SIR:

- “OSBG” is a specific legal term that may limit this principle; this principle must include “no changes to objectives, boundaries, measures or any other actions taken under orders authorized under any existing applicable statute. Also, suggest adding: recommendations may be made to appropriate decision makers for consideration at the completion of the process.

Response:

- Modified wording in guidelines. Recommendations can be made to appropriate decision makers throughout the process. Refer to the ‘Evaluation’ and ‘Implementation and Approval’ sections of the guidelines.

Early engagement of First Nations and other stakeholders

SIR:

- “Early stakeholder engagement”. I agree with this principle but why is it listed as step 5 in the process chart, after the decision is made to commence work? What might the impact be on ministry staff? How will this fit with other priorities? Shouldn’t the principle be that industry should acquire their own biological horsepower as much as possible?

- Flowchart: how can First Nations and biologists be engaged after OIF and RED have endorsed project? How is this consistent with current SEAs or principles with FNs? How does this not introduce perceived “bias” or distrust to the process?

- Gov’t staff specialists should be engaged earlier than step 5 or 6 and definitely ahead of PFF approval which will increase industry expectations.

Response:

- Stakeholders and First Nations are engaged in the process early on (refer to ‘Screening’ section in the guidelines) and also the ‘Detailed analysis’ and ‘Evaluation’ phases of the process. A more formal engagement process should happen after projects have been screened and approved. This would avoid considerable time and effort invested in formal consultation for a project that that is not guaranteed to move forward.
In the guideline, under ‘Screening’ the wording has been modified to reflect early stakeholder engagement in this step. The screening process also ensures that we are managing Industry expectations so the proponent does not invest a lot of effort into a project that does not show much potential benefit.

Yes, projects can be proponent-led, however ministry biologists and ecosystem specialists need to be engaged early to ensure full value of information is considered.

**NIR:**

- First and foremost we need to put engagement with First Nations earlier in any project, and use “co-location principles” to follow up with implementation.
- Step 5 of the process indicates First Nation Consultation and Stakeholder engagement. For many of the Northern TSAs, First Nations have recently been ‘brought on board’ with respect to ‘collaboration’ on issues of forest stewardship. An example of this is the Province of BC recently signed two G2G framework agreements with the Carrier Sekani First Nations (CSFN) in the Omineca Region. These agreements initiate a significant shift in the relationship between the Province and the CSFN to one based on a collaborative approach to land and resource stewardship. In areas where these new FN stewardship agreements exist FNs will need to be involved in the process of delineation of the co-located areas and will be participants in the Detailed Analysis phase (Phase 6 p. 7). Areas of significant cultural significance may be able to be co-located with other values where possible.

**Response:**

- Same response as above. Modified guidelines to include references to other stewardship agreements between government and First Nations, e.g. G2G framework with Carrier Sekani First Nations in the Omineca Region.

### Multiple Resource Value Assessment (MRVA)

**SIR:**

- How can the initial steps not include some assessment of “risk to the values” currently as part of the initiation consideration? What is the point of embarking on a process if some of the identified values may currently be at high risk or of importance to FNs? Why not use some cumulative effects/MRVA information in combination with expert advice to understand this risk?

**Response:**

- Any pertinent information can be used to establish where these projects should occur. The point of the project is to look for optimal areas for all values. Key areas for some values (i.e. cultural sites) which cannot be met in other locations can become the anchor points for other value locations.
- Modified guidelines document to include reference to Multiple Resource Value Assessment information.

### Timber Harvesting Land base (THLB) and constraints

**SIR:**

- Always love references to THLB as though it were all equal. You could actually increase the amount of THLB and decrease the timber supply, and of course THLB is just an approximation that changes with
markets, inventory, operability and field verification. Lots of THLB is inoperable and vice versa. To focus on just flipping modelled non-THLB constraints into THLB is hardly a good stewardship exercise.

Response:

- The objective with these projects may include an increase in the timber supply (if there is one). But the main objective is to ensure that the constraints are in the optimal location which may offer better accessibility to difficult stands and less fragmentation of THLB.

SIR:

- Many designations were placed on the land base because there was not another “constraint” limiting harvesting (eg – at one time we were told not to designate WHAs under OGMAs), and many constraints are partial forest cover constraints (eg MDWR) and not full impacts to THLB. Many values/habitats exist on the landbase without a designation and moving an OGMA for example may then trigger a need for the designation. And many orders invoke actions at the site level not identifiable at the inventory level. Summarizing constraints in the matrix table is overly simplistic.

Response:

- The summary matrix is just an example of the possibilities.

NIR:

- I understand there was a typo in the proposal, and it was meant to be one project per area. The process proposed to have a project declared as an official ‘THLB Stabilization project’ has become somewhat more complex with significantly more government oversight. We have a number of high priority initiatives and limited resources. We would suggest utilizing the Mackenzie Stewardship Initiative as the North Area Stewardship Timber Harvesting Land Base (THLB) Stabilization Project to maximize the use of our limited resources.

Response:

- The Mackenzie Integrated Silviculture Strategy stewardship Initiative can certainly be the project for the North Area if it includes the scope of this project at the same time. The group involved will have to ensure this is included.

NIR:

- For many areas, Omineca region is just now initiating location of objectives such as UWR and spatial OGMAs. In these processes all opportunities for overlapping values are being sought. Phase 3 of the proposed Guidelines – ‘Multiple Objectives Matrix Analysis’ may not report significant overlap because there are no areas currently designated. This phase may not be applicable in these instances. Further, page 6 of the guidelines (Multiple Objectives Matrix Analysis) indicates that “each proponent is to do Multiple objectives matrix analysis for all nine projects.” I believe this should say that ‘Each project proponent with conduct a multiple objectives matrix for his/her proposed project.’

Response:
• The multiple objectives matrix analysis is just an example of the possibilities. Changed the wording to reflect that such analysis could be proponent-led.

• It is important where we are establishing new areas for values on the land base, that the principles in these guidelines are followed.

CR:

• So these guidelines look fine in principle although I did not get into the details too far. The aspect of early engagement from appropriate parties is a key element that I was pleased to see had a lot of focus. I hold out promise that some of these detailed reviews will produce some gains in THLB and maintain management expectations as well but...

• Where the real challenge lies is less in the overlaps and more in the continuous withdrawing process. Land decisions are made that can undo all of the proposed incremental work 100 times over. For example, the removal of ~5000 ha from the Fraser TSA (maybe 3500 THLB) for a commercial recreation area is a big THLB change. Maybe the decision is in the public interest, maybe not. In this case, we are overlapping a FNWL to mitigate some of the THLB impact but it can only handle about 30% mitigation in the long term – the rest is a withdraw for commercial recreation purposes. This will be an ongoing issue in Districts with a lot of land use pressures and it is a clear factor in why some of the previous licensees left Chilliwack under the Bill 28 take back process.

• Not an easy issue but probably important to the overall discussion of THLB stabilization and industry competitiveness.

Response:

• The Stewardship/THLB Stabilization project will not address removals from the THLB such as the Bill 28 take back process.

• Significant land withdrawals do create heavy impacts to THLB but also offer areas of anchor where other values can be established. The project is meant to be integrated requirements to meet the needs. i.e. maybe where the recreation occurs there is part that fulfills MDWR that allows for some disturbance rather than having separate areas.

Pilots

SIR:

• Re: proposed Okanagan pilot, interesting to note the stated driver is THLB reduction, however, the majority of reductions were due to analyst modelling changes from “cover constraints” to “THLB netdowns” from the previous TSR, a new definition of NP in the VRI, as well as an increase in roads and small tenures. I’m sure non-forest tenures also play a role. Okanagan NGOs will be very interested in this process.

Response:

• Yes, non-forest tenures (e.g. hunting and trapping licenses etc.) were identified as a criteria in the original email regarding a land base decision from Steve Schell (Email from Steve Schell to Atmo Prasad).
• We would suggest utilizing the Mackenzie Stewardship Initiative as the North Area Stewardship Timber Harvesting Land Base (THLB) Stabilization Project to maximize the use of our limited resources.

Response:

• Will add this to Appendix B as a potential pilot.

CR:

• There is a pilot underway in the South Island District, an IRMP for the Arrowsmith TSR. It isn’t showing up on your presentation.

Response:

• Yes, this is referenced in Appendix A as well as in the table in Appendix B under ‘Program Linkages’.

General

BCTS:

• Current BCTS business areas are actively involved in project that are listed in Appendix B of the document. Interest in work that will stabilize the operating land base and timber supply and support the market pricing system.

Response:

• No action required.