

## Public Review Comments and Responses

### **Lakes South Sustainable Resource Management Plan Proposed Old Growth Forest Objective Amendment, May 2006**

June 12, 2006

Judy Stratton (via telephone)

The document needs to state clearly that the other objectives in the SRMP still apply where there is an overlap with OGMA's. For example, in the Chelaslie Caribou Migration Corridor, harvesting is not allowed. This restriction should remain in place even though an OGMA is located within it and some harvesting may be allowed within an OGMA.

Response:

The document of May 2006 was amended (see April 2007) in the section **“Old Growth Forest Retention through OGMA Establishment”** to state, “It is important to note that where other objectives overlap with Old Growth Management Areas, those objectives continue to apply.”

August 15, 2006

Ministry of Forests and Range, Leigh-Ann Fenwick (e-mail)

- The figure referenced in strategy #6 (Figure 1: Decision Matrix for Harvesting in OGMA's) needs to be revised. The figure refers to the DM determining what option is appropriate with regards to harvesting within an OGMA. The DM no longer has authority to decide which option will be used for the OGMA.

Response:

Changes made to the strategy are shown in **red**:

- 1) Allow natural processes (i.e. fire, insects, disease) to occur within OGMA's except where those processes threaten values within or outside the OGMA's. Aim at retaining structural features of old growth where intervention is required (see Figure 1 Decision Matrix for Harvesting in OGMA's, Lakes South Sustainable Resource Management Plan, June 2003). **Note that the DM no longer has authority to decide which option will be used for the OGMA. That responsibility now lies with the Integrated Land Management Bureau;**

August 15, 2006

Ministry of Forests and Range, Leigh-Ann Fenwick (e-mail)

- Strategy #2 should be deleted as it states that "timber harvesting is permitted under strategies 3, 4, 5, 6 or 7". In the objective it states that timber harvesting is not allowed except under a) or b). The strategy is not legal, and therefore cannot over-ride the objective. Also, #7 deals with grazing, not timber harvesting.

Response:

Change wording of strategy #2 so that “timber harvesting” is deleted, to be consistent with the intent of the objective. The strategy now reads, “**Within OGMA’s the following activities will be allowed:**”

Delete strategy #7 which referred to grazing leases, and change Strategy #2 to read, “**existing grazing leases**”, rather than “grazing”.

August 24, 2006

Lakes South forest licensees (Canadian Forest Products, Fraser Lake Sawmills, BC Timber Sales, Babine Forest Products Company, Burns Lake Community Forest)

Licensees strongly feel that objectives for old seral forest can be met through the application of non-spatial old seral forest targets. Licensees state they are prepared to work together to achieve the old seral forest targets by utilizing monitoring practices and procedures similar to managing for existing landscape targets such as for seral stage and patch size distributions.

Response:

No change to order or amendment document, based on the following:

- Flexibility for forest licensees has been provided for by allowing the targets for old seral forest to be partially met aspatially i.e. non-specific locations on the landbase.
- A significant amount of OGMA representation should occur on the landbase to ensure a level of planning certainty for existing and pending tenures.
- Biodiversity comes with a social cost that is widely understood and forms part of government policy.
- The integrity and value of large OGMA’s may be reduced through relatively smaller OGMA’s being placed across the landscape if an aspatial process is followed in its entirety. Maintaining a meaningful amount of known, spatial OGMA’s will help manage such concern.
- Determining attributes of aspatial OGMA’s may become problematic over time versus the present ability to easily assess and monitor the defined OGMA’s.
- Although the licensees’ letter suggests a commitment to a collaborative process in support of an aspatial approach, to date, such a process has not emerged. The IFPA process is problematic in terms of assuming such a role in that Non-Renewable Forest Licence holders (NRFLs) are not linked to them, and a mechanism to link them is not readily known at this time.
- The review dates built into the Lakes South SRMP provide all parties a window of opportunity to reassess the impacts of a variety of social decisions such as seral stage, OGMA’s, patch size, etc....such review dates are in the near future and both social and harvest level outcomes may be re-evaluated in due course.
- From FRPA FSP experience, it appears that seral stage and patch size monitoring, tracking and trending is an issue of importance re: one’s ability to monitor in a meaningful manner. Adding aspatial OGMA tracking may compound the matter.
- There is a low degree of confidence from the agencies’ perspectives in the aspatial approach to old growth forest tracking.

#### September 2006

Slight changes were made to OGMAs 7 and 8 in the West Francois Landscape Unit, to address a guide-outfitter's concerns which had originally been brought to our attention in April 2006, but which he had not formalized until September.

#### November 2006

A forest licensee's concern was brought to ILMB's attention, and slight changes were subsequently made to OGMAs 95 and 96.

#### December 21, 2006

Lakes South forest licensees (Canadian Forest Products, Fraser Lake Sawmills, BC Timber Sales, Babine Forest Products Company, Burns Lake Community Forest)

Licensees have agreed to accept the outcome of the Decision Maker provided the Decision Maker is fully aware of the potential to mitigate mid-term timber supply impacts as described in letter of August 24, 2006.

#### Response:

The Regional Executive Director (Decision-Maker) was briefed on the impacts to timber supply as described in the August 24, 2006 letter, resulting from the establishment of Old Growth Management Areas in the Lakes South SRMP area.

#### March 2007

Comments were received from ILMB Headquarters to integrate the objective into the order itself, and to streamline some of the strategies to improve clarity.

#### Response:

The objective was integrated into the order in such a way that it removed redundancy while maintaining the overall intent of the objective. The strategies were modified slightly to improve clarity.