

Appendix 22: First Nations Comments

Information Sharing Communication Log



Following is the SFMP# 3 information sharing contact summary.

Doig River First Nation

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2015: Initial SFMP info share e-mail sent by DR

Jan 25, 2016: Follow-up E-mail sent by JM

March 23, 2016: JM attempted to send final follow-up e-mail but Jane Calvert's in-box was too full. JM called DRFN and left message.

March 24, 2016: Final follow-up e-mail sent by SS (BCTS)

March 30, 2016: Info-share period for the draft 2016 SFMP closed.

Blueberry River First Nation

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2016: Initial SFMP info share e-mail sent by DR

Jan 25, 2016: Follow-up e-mail sent by JM

Jan 25, 2016: BRFN sent an e-mail confirming they received the follow-up e-mail and acknowledged the close of the info-sharing period.

Feb 12, 2016: BRFN requested a presentation be made to chief and council regarding the draft SFMP.

Feb 18, 2016: Canfor and BCTS presented the SFMP to BRFN Chief and Council and Land Manager.

Feb 19, 2016: JM emailed Norma Pyle the information that had been requested during the Feb 18, 2016 meeting.

Feb 26, 2016: Comments received from BRFN during the presentation on Feb 18, 2016 were summarized and emailed to BRFN.

March 14, 2016: A meeting unrelated to the SFMP between Canfor and BRFN was cancelled so JM called and emailed BRFN to request that that meeting time be used to continue discussing the SFMP. They were reminded of the upcoming deadline for comments. No reply was received.

March 30, 2016: Info-share period for the draft 2016 SFMP closed.



Halfway River First Nation

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2016: Initial SFMP info share e-mail sent by DR.

Jan 25, 2016: Follow up e-mail sent by JM

Feb 19, 2016: Brent Fox sent a letter requesting shapefiles for the SFMP. JM explained that the SFMP is not spatial and there are no shapefiles. The link to the FTP where the plan can be found was resent.

March 23, 2016: Final call for comments was sent out.

March 24, 2016: Lyle Mortenson on behalf of HRFN replied stating HRFN was satisfied that HRFN interests were addressed provided the terms outlined in the CCUA MOA are followed.

March 30, 2016: Info-share period for the draft 2016 SFMP closed.

West Moberly First Nation:

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2015: Initial SFMP info share e-mail sent by DR.

Jan 25, 2016: Follow up e-mail sent by JM

March 24, 2016: Final call for comments of draft SFMP was made. No comments were received

March 30, 2016: info share period for 2016 draft SFMP closed.

Saulteau First Nation:

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2015: Initial SFMP info share e-mail sent by DR.

Jan 25, 2016: Follow-up e-mail was sent by JM

Jan 25, 2016: John Stokmans replied to follow-up e-mail stating he acknowledges the referral and will call if he has questions or wants to request an extension.

March 8, 2016: JM discussed some of the content of the SFMP with John Stokmans. John was busy with other referrals at the time and said he hadn't reviewed it yet.

March 23, 2016: final call for comments on draft SFMP was made.

March 23, 2016: John Stokmans replied that he had not reviewed the plan yet but was working on finding time.



March 30, 2016: info share period for 2016 draft SFMP closed.

April 5, 2016: John e-mailed Darrell to tell him that he was unable to review the SFMP in the time provided and asked whether it would be going through FLNRO consultation. Darrell informed John that the SFMP would be going through the FLNRO consultation process.

Horse Lake First Nation:

Dec 22, 2015: Initial SFMP info share e-mail was sent by DR.

Jan 25, 2016: Follow up e-mail sent by JM

March 24, 2016: Final call for comments on the draft 2016 SFMP was made. No comments were received.

March 30, 2016: info share period for 2016 draft SFMP closed.

Prophet River First Nation:

Invited to attend March 17, 2015 and Sept 22, 2015 PAG meeting discussions of SFMP# 3.

Dec 18, 2015: Initial SFMP info share e-mail was sent by DR.

Jan 25, 2016: Follow up e-mail sent by JM

March 24, 2016: Final call for comments on the draft 2016 SFMP was made. No comments were received.

March 30, 2016: info share period for 2016 draft SFMP closed.

Fort Nelson First Nation:

Dec 18, 2015: Initial SFMP info share e-mail was sent by DR.

Jan 14, 2016: DR received an e-mail from Lana Lowe requesting that Canfor provide time and resources to allow them to review the SFMP plan.

Jan 24, 2016: DR replied to Lana's request.

Jan 25, 2016: Follow up e-mail sent by JM

March 24, 2016: Final call for comments on the draft 2016 SFMP was made.

March 24, 2016: out-of-office reply was received from 2 member of the lands department from FNFN. No comments were received.

March 30, 2016: info share period for 2016 draft SFMP closed.



Dene Tha' First Nation:

Dec 18, 2015: Initial SFMP info share e-mail sent by DR.

Jan 25, 2016: Follow up e-mail sent by JM

March 24, 2016: Final call for comments of draft SFMP was made. No comments were received

March 29th, 2016: Kevin Kuhn e-mailed DR with a request for some specific information related to the SFMP and info-sharing to date.

March 30, 2016: DR replied to Kevin Kuhn's inquiry.

March 30, 2016: info share period for 2016 draft SFMP closed.

March 31, 2016: Baptiste Metechooya sent a formal response to Canfor regarding SFMP 3.

April 6th, 2016: JM replied to DTFN's comments. A meeting was arranged to discuss the SFMP on April 29th, 2016

April 29th, 2016: conference call between SS, DR, JM, Courtney Booker, BM, KK to discuss details of SFMP 3

May 4, 2016: JM sent BM, KK summary of the conference call.

May 20, 2016: DR sent BM, KK update regarding discussion of WTP calculation.

No further comments were received.



Summary of Written Comments Received

Written comments were submitted by the Dene, Tha First Nation (DTFN). No other First Nation provided written comments regarding SFMP# 3.

Following are the comments provided by the DTFN:

Dene Tha First Nation
PO Box 120
Chateh, Alberta
T0H 0S0



Telephone:
(780) 321-3774
(780) 321-3775
(780) 321-3842

Fax:
(780) 321-3886

March 31, 2016

Delivered by Email

Canadian Forest Products Ltd.
RR #1, Site 13, Compartment 2,
Fort St. John, BC
V1J 4M6

BC Timber Sales
Dawson Creek Timber Sales Office
9000 – 17th Street
Dawson Creek, BC V1G 4A4

Attention: **Darrell Regimbald**, Planning Coordinator (darrell.regimbald@canfor.com)
Jennifer McCracken, Planning Forester (stephanie.smith@gov.bc.ca)

Dear Sirs/Mesdames:

Re: Fort St John Pilot Project Draft 2016 Sustainable Forest Management Plan #3

I write to you on behalf of the Dene Tha' First Nation (the "DTFN") in regards to the Fort St John Pilot Project draft 2016 Sustainable Forest Management Plan #3 (the "SFMP").

As you may be aware, DTFN is a signatory to an adhesion of Treaty No. 8, (1900) and has constitutionally protected s.35 Aboriginal and Treaty rights, that its members exercise, within our Traditional Territory and overlapping SFMP areas.

Over the last number of years, Dene Tha's ability to exercise its Treaty 8 rights has been significantly eroded. With each new development that takes place, whether it be logging, oil or gas projects, dams or some other type of development, more and more lands are taken up, leaving fewer and fewer areas for Dene Tha' to practice its Treaty rights. Our Traditional Territory contains thousands of miles of roads, pipelines, seismic lines and other linear corridors, and numerous well sites, processing plants, power plants, cut blocks and other developments. Dene Tha' has been seriously affected by this development, and its Treaty rights compromised.

Cumulative effects of all of this development threaten not only our ability to continue to exercise our Treaty 8 rights, but also our cultural existence as Dene Tha' people. Being Dene Tha', we are intimately connected to the lands, waters and resources in our Traditional Territory and we have stewardship responsibilities to take care of them. We teach our children our cultural and



- 2 -

harvesting practices and language, and what it means to be Dene Tha', by being out on the lands with them in our Territory. We continue to be sustained by the wildlife, birds, fish, plants and medicines that we harvest out on the land. We prefer our traditional diet over store-bought products, and it is critically important to us to be able to continue to rely on resources in our Traditional Territory to feed our community into the future.

Development needs to be proactively and carefully managed to ensure that sufficient wild places and suitable areas to harvest remain to support a meaningful ability to successfully hunt, trap, fish, and gather the many species of animals, fish, birds, plants and medicines upon which our culture and traditional livelihoods rely.

The DTFN are holders of unique traditional ecological knowledge and traditional use study information within the SFMP area – it is very likely, if not certain, that this information could assist in the identification, assessment, mitigation, and accommodation of potential site-specific and landscape level concerns, issues or opportunities that may arise in relation to the SFMP and any proposed or future forest operation schedules or plans that may require Ministerial approvals.

We understand very well from experience, that forestry and logging activities, including future execution of forest management plans, within our Traditional Territory can pose a very high risk for potential adverse impacts to the environment and the ability of our members to meaningfully exercise their s.35 rights.

We would like to take this opportunity and schedule a meeting with you to discuss the SFMP and any future development plans including a review of the SFMP and descriptions of how any proposed changes from previous versions might affect future forestry and logging operations – in practice, within DTFN's Traditional Territory.

We look forward to your reply and our next meeting.

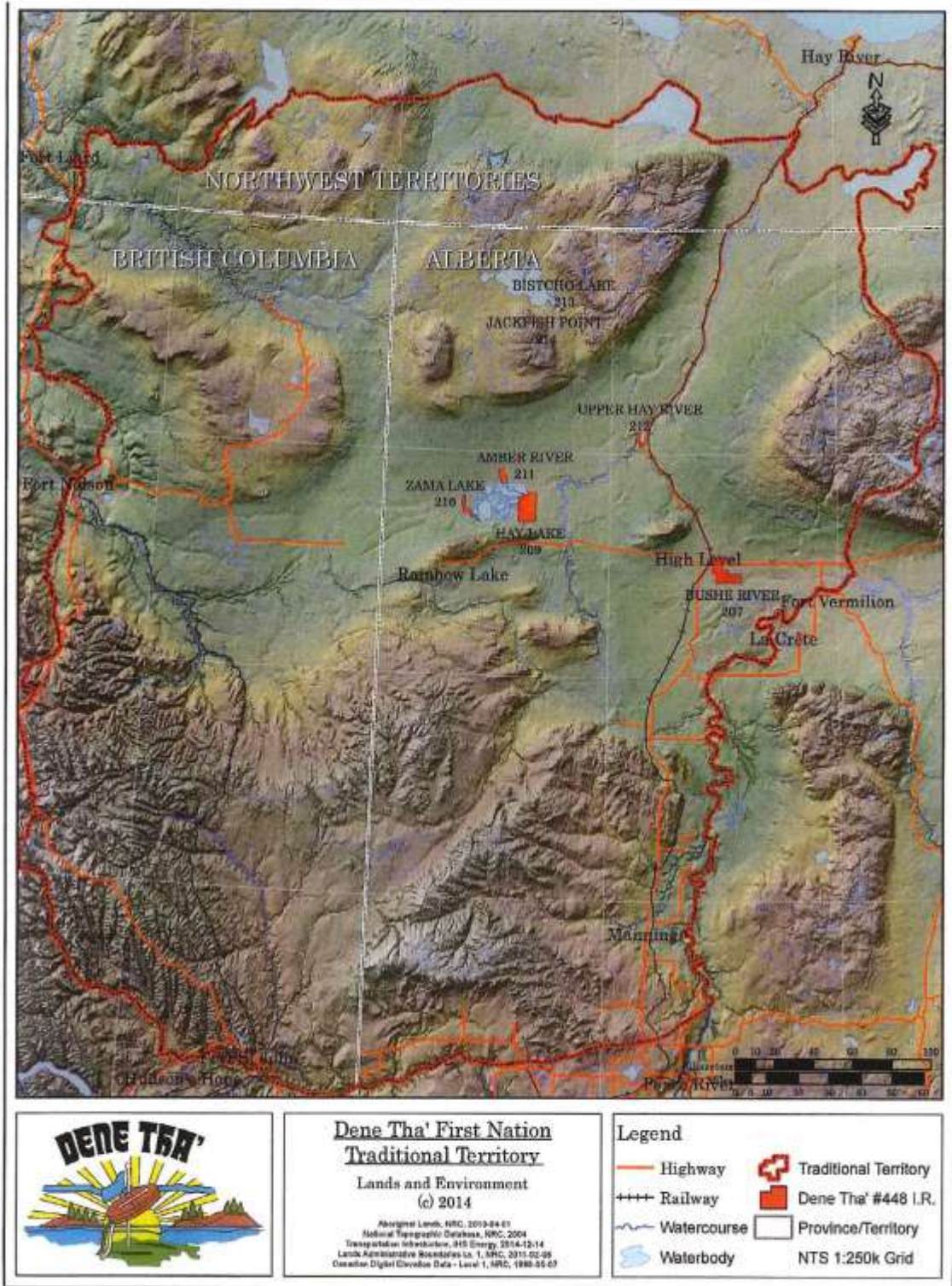
Yours truly,

[DENE THA' FIRST NATION]

Baptiste Metchooyeah
Lands Department, Manager
(baptiste.metchooyeah@denetha.ca)

Cc: Dene Tha' First Nation, Attn.: Chief Joe Pastion and Council (joe.pastion@denetha.ca)
Dene Tha' First Nation, Attn: Fred Didzena (fred.didzena@denetha.ca)
MFLNRO – Peace Forest District, attn.: Ashlyn Exley (ashlyn.exley@gov.bc.ca)

Enc: Map of DTFN's Traditional Territory



Summary of SFMP# 3 Review Discussion with DTFN

Following is the summary of the SFMP# 3 review discussion held with DTFN:

SFMP 3 Review Discussion

Conference Call April 29 2016

Attendees: Baptiste Metchooyeah, Kevin Kuhn, Darrell Regimbald (Canfor), Jennifer McCracken (Canfor), Stephanie Smith (BCTS), Courtney Booker (MFLNRO)

DTFN Concerns

Baptiste: Concerns are similar, regardless of border; Clearcutting, Buffering of lakes and streams and wildlife concerns

Fort St John Pilot Project Regulation (FSJPPR) Overview

Canfor and BCTS are the managing participants in the FSJPPR; prepare the Sustainable Forest Management Plan and Forest Operations Schedule on behalf of all FSJPPR participants. There are 2 managing participants and 6 companies that have agreed to the Pilot Project and have Canfor manage their planning. The FSJPPR only applies to the Fort St John Timber Supply Area.

The Forest Operations Schedule (FOS) is the plan that show planned blocks and roads for all participants. There is a new FOS being developed, and should be ready for public and First Nations review and comment this summer.

What is the term of the SFMP and FOS? SFMP is a 6 year plan, as well as the FOS. In the FSJPPR it identifies that there must be at least 6 years volume shown in the plan. For consistency, the SFMP is set up at the same timeline as the FOS.

Question (Kevin): Are silviculture activities shown on the Plan?

Response (DR): Silviculture activities (site prep, planting, herbicide) – are not shown. Species management (conifer or deciduous) is identified in the FOS; the brushing program is described in the Pesticide Management Plan (PMP). Part of the PMP, is the Notification of Intent to treat (NIT) - this provides the individual blocks and treatment plan for the block each year. The NIT allows for the public

to comment on the proposed brushing treatments. The SFMP identifies the reforestation targets (stocking standards).

Question (Kevin): How solid is FOS year 1-6?

Response (DR): The FOS doesn't identify the planned harvest date. Canfor has a 3 year operating plan where the harvest sequencing is planned. The other licensees, LP, CNRL, Chetwynd Mechanical Pulp, Peace Valley OSB and Dunne - Za have their blocks logging scheduled in Canfor's 3 Year plan. Chetwynd Mechanical Pulp (CMP) has a small area in south part of the FSJ TSA that is not part of the SFMP or FOS, they do their own scheduling in this area under their Pulpwood Agreement. BCTS has a sales schedule that identifies harvest dates.

Comment (Baptiste): Pesticide Use- DTFN is not supporting the use of Pesticide. There is concerns with the weather monitoring (i.e. Jason's Meeting regarding the BCTS PMP in March). The weather on the ground and the helicopter environment is different. Concern is that the chemical is not applied when the chemical is sprayed.

Response (DR): Pilot Project Participants follow strict weather guidelines to ensure that the chemical is effective, reaches the intended vegetation and there is no drift. As long as the weather windows are used, the effectiveness is there. We have been trying to reduce the use of herbicide on an annual basis, and the trend is going down. On average we are using herbicide on 20-30% of the total area harvested annually. We are trying to minimize the amount of area treated with herbicide, in the 2014 reporting year approximately 571.4 ha were treated and 5,385.7 ha were harvested. The treated area represents 10.6% of the total area harvested in 2014.

Comment/Question (Kevin): Water management is a concern around buffers; trapping and trapping access; commenting at the SFMP level (high level) would not be as good as commenting on the FOS level. Streams are identified by stream class, as for the legislation. In Alberta, <1.5m, 1.5m to 5m, >5m Fish presence isn't a factor. How does this compare to this SFMP?

Response (DR): The SFMP proposes following the stream classification and management system identified in the FSJPP Regulation:

- <1.5 m Fish Bearing No Riparian Reserve Zone (RRZ- no harvesting), Riparian Management zone (RMZ) = 30 m; typically RMZ restrict tracks of machines in those zones, but machines can reach in and remove timber.



- <1.5-5m- 20 m RRZ (timber) and a 20 m RMZ. Intent of RMZ is to provide some windfirmness; feathering of the zone may be done in that RMZ
- >5m -20m in width - 30 m RRZ and a 20 M RMZ
- >20 m in width- 50 m RRZ and 20m RMZ

Comment (Baptiste) DTFN have asked for these buffers because those areas were historically travelled by people. Reserves protect cultural sites.

Questions (Kevin): What is the retention targets on cutblocks:

Response (DR): Retention targets are not on a cutblock basis, rather they are assessed on a landscape unit level. Each LU has a different target based on natural disturbance patterns. The targets range from 3% to 8%. Actual retention levels range from a low of 6.9% to a high of 16.8 % in WTP patches in the Milligan. We are exceeding targets in all LU's.

Question (Kevin): Do WTPs have to be contiguous to the block boundary? Do you keep track of external WTP area?

Answer (DR): No- they are supposed to be non-contiguous to count towards the retention targets; stream buffers are sometimes considered WTP. External WTP does not contribute to the indicator.

Question (Kevin): Does the external WTP contribute to the Timber Supply?

Answer (DR): No, if identified as a WTP, they are considered to be reserves set aside from harvest for a rotation, they are not considered to be part of the available timber for future harvest.

Comment (Kevin): The target in High Level is 1%. The landscape is not that different from High Level. The Northern part of the FSJ TSA is similar to High Level.

Comment (BM): Drought and climate change are impacting the wetlands. This is a concern due to new diseases being introduced by the stress. Due diligence is needed where land and water are being discussed.

Answer (DR): The Participants are confident that the stream buffers and WTPs in place are adequate regarding protection of stream quality, prevention of sedimentation, etc. With respect to climate change, the Provincial government sets the rules regarding tree planting species – what tree species seedlots can be planted by geographic location to ensure that the trees planted are adapted to the climatic conditions of the various sites throughout the province. They have recognized the issues with



the climate change. We move tree seedlings in compliance with the provincial regulations.

Question (BM): Is climate change monitoring done by the companies?

Answer (DR): No instrumented climate change monitoring is done as part of the SFMP. However we will use the latitude available in the tree seed transfer guidelines to plant species that we feel will be best adapted to the expected changing climactic conditions.

Question (BM): Are Cumulative Effects impacts measured as part of the plan?

Answer (DR): Yes, the participants complete an analysis to look at the proposed road and blocks, which includes previous land clearing, including oil and gas, to determine if we were to go ahead with the harvest of all blocks proposed in the FOS, if we will meet the SFMP targets for land based values such shrubs, old growth forest, patch size, etc. This is reported in the FOS.

Comment (BM): DTFN has traplines in BC, so Forestry is a concern for DTFN.

Question: Are the impacts measured against other industries and their plans?

Response (DR): We do not measure against targets set by other Industries. We can account for their impacts through our analysis if their projects have been completed and mapped.

Question (Kevin): Development happens annually, how often is the vegetation inventory updated?

Answer (DR): Forestry Depletions to the vegetation inventory are done on an annual basis by the government, based on the industry submissions. Oil and gas submit as-built plans on a similar timeline. Available Spatial data for oil and gas development is reasonably accurate.

Question (BM): What are the impacts of these Forest Fires on planning?

Answer (SR): SFMP has an indicator that prompts us to assess disturbances from disease and fires for timber salvage opportunities. If possible, the Participants try to harvest damaged timber.

Comment : Dene Tha First Nations have funding Issues - no funding for this type of engagement is provided by government. Appreciate these meetings, and try to address a lot of the issues in NEBC. At some point, the funding issue needs to be discussed.

Clarification email sent to DTFN May 20, 2016.

Baptiste, Kevin,

Today while I was reviewing the summary of our discussion with you on April 29, 2016 of the draft Fort St John Pilot Project Sustainable Forest Management Plan# 3 (SFMP# 3), I noticed an error with respect to the discussion of the contribution of Wildlife Tree Patches (WTP) that are external to a cut block or contiguous to a cut block boundary, to the calculation of WTP %.

Our discussion and the meeting summary erroneously indicates that external WTPs do not contribute to the calculation of WTP % for the purpose of reporting on the SFMP WTP performance indicator. This is not correct. WTPs that are external or contiguous to a cut block boundary do contribute to the calculation of WTP area retention for the purposes of reporting on WTP retention performance by the Fort St. John Pilot Project Participants.

I apologize for any confusion this error may have caused.

Cheers!

Darrell Regimbald RPF

Canfor FMG North Planning Coordinator

Tel 250 787-3651

Cell 250 793-1705

Fax 250 787-3622

Summary of SFMP# 3 Review Discussion with BRFN

Following is the summary of the SFMP# 3 review discussion held with BRFN:

BRFN Feedback on Draft SFMP #3 received at the presentation

February 18, 2016 10am -3pm

Comment on Slide #7.

Re: values and objectives in SFMP were based in part on input from the PAG

BRFN Lands Manager: Why is there not a First Nations advisory Group?

Response: The FSJPPR requires that the Participants must establish and maintain a public advisory group. The Fort St John Pilot Project public advisory group currently consists of membership that includes the Saulteau, West Moberly, Halfway River, Prophet River and Doig River First Nations. Prior to November 2015 the FSJPP PAG membership included representation from the Blueberry River First Nation.

Comment on slide #13

Re: list of landscape level strategies.

BRFN Lands Manager: Why is there no First Nation Landscape Level Strategy? There should be a Treaty 8 Rights LLS.

Response: The FSJPPR identifies the landscape level strategies that at a minimum, must be included in an SFMP to provide direction for the management of forest resources. In addition to the landscape level strategies, the SFMP includes indicators and targets that are linked to the recognition of Treaty Rights and the management of forest resources that may affect the practice of Treaty Rights. This includes, the indicators that are linked to ecological management and to the recognition of Aboriginal and Treaty Rights (I 67: Rare Ecosystems, I 17: Representative Examples of Ecosystems, I 1: Forest Types, I 28 Species Composition, I 2: Seral Stage, I 3: Patch Size, I 5: Snags and Cavity Sites, I 9: Wildlife Tree Patches, I 6: Coarse Woody Debris Volume, I 7: Riparian Reserves, I 8: Shrubs, I 11: Species at Risk Stand Level Management Guidelines, I 16: Ungulate Winter Ranges, Wildlife Habitat Areas and MKMA, I 10: Invasive Plants/Noxious Weeds, I 15: Class A Parks, Ecological Reserves & LRMP Designated Protected Areas, I 18: Graham Harvest Timing, I 19: Graham Merch Area, I 20: Graham Connectivity, I 22: River Corridors, I 57: Number of Known Values and Uses Addressed in Operational Planning., I 25: Forest Health, I 7: Riparian Reserves, I 34: Peak Flow Index, I 35: Water Quality Concern Rating, I 36: Protection of Streambanks, I 37: Spills entering Waterbodies, I 23: value and Total Number of Contracts Awarded to First Nations, I 33: First nations Consultation and Information Sharing, I 56: maintenance of Wildlife and Fisheries Habitat, I 62: Brushing Program Aerial Herbicide Use).

Comment on slide #14



RE: accountability to Government and Public.

BRFN Lands Manager: KPMG has never come to BRFN. BRFN would like their contact information so they can forward an invitation to KPMG this year.

Response: The contact information for KPMG performance Registrar Inc. was provided to the BRFN.

Comment on slide #21

RE: Ecosystem Diversity Indicators: Indicator 9: Wildlife Tree Patches

BRFN Lands Manager: Why is there no retention along minor creeks? Why are WTP's often located in places where there are no wildlife values (e.g. Rocky outcrops). Who is monitoring to ensure the WTP's are in the right places? The indicator just specifies the amount of area to be retained but it does not check if it is the "right" areas.

Response:

Riparian areas occur adjacent to wetlands or bodies of water such as rivers, streams, or lakes, and include stream bank and flood plain areas. On larger streams particularly, riparian areas often provide productive, structurally diverse habitats. In addition to providing ready access to water, these areas also support important habitat features such as coarse woody debris, cavity sites, shrubs and broadleaf trees, which have been identified as key habitat elements necessary to support species richness.

Riparian reserve zones (RRZ's) are specific areas on larger fish bearing streams, and some wetlands (W1) and lakes (L1) in which harvesting is not normally permitted, in order to protect significant riparian and aquatic habitats. Maintaining RRZ's provides many of the habitat elements needed to support a diverse species mix across the landscape.

Minimum RRZ's widths are identified in Schedule 'D' of the *FSJPPR*, and relate to activities carried out under the *FSJPPR* by the Participants, excluding road rights of way necessary to cross streams.

All streams, wetlands, and lakes in or immediately adjacent to a planned harvest area will be classified and mapped in the field prior to the commencement of harvest operations. RRZ's that meet or exceed the RRZ widths noted in Schedule D of the *FSJPPR* will be located and clearly marked in the field.

Current practice when establishing reserve boundaries in the field on S1, S2, and S3 streams is to utilize natural topographic breaks and timber type boundaries that result in irregular shaped edges. In practice reserve widths are normally wider than the minimum, but vary significantly in distance from the stream along their length, based on the natural breaks that are typically used for the boundary. These natural boundaries are usually inherently more windfirm than fixed width RRZ's, and easier to implement, so this practice is the preferred strategy for delineating RRZ's in the field.

The majority of riparian classifications completed by Participants within or adjacent to their operations will be on S4, S5 or S6 streams, so management measures on these small streams without mandatory riparian reserve zones can have a very meaningful impact on riparian and water resources.

SLP's (Site Level Plans) contain site-specific measures designed to protect streambanks, stream channel stability, and in many cases adjacent riparian vegetation. Protecting the streambanks and stream channels reduces the risk of sedimentation entering the watercourse, and contributes to the maintenance of water quality on streams without mandatory riparian reserve zones.

Management strategies for the protection of these values on streams without mandatory riparian reserve zones, as well as for the protection of other non-fishbearing waterbodies, are based on site-specific field assessments. Factors such as riparian classification, topography and slopes, soil characteristics, season of harvest, snow loads, vegetation and habitat characteristics are considered when prescribing management strategies to protect the values on small streams without riparian reserve zones. Measures that may be implemented include designation of Wildlife Tree Patch or other reserve area, restricting harvesting operations to frozen ground conditions, compressible snow pack criteria, establishment of machine free or machine sensitive zones, use of low ground pressure equipment, and prescribing retention of non-merchantable stems within riparian areas.

Wildlife Tree Patches (WTP's) are forested areas of timber within or immediately adjacent to a cutblock that are retained primarily for their value in providing a source of habitat elements, or for the protection of important habitat features.

WTP's provide sources of shrubs, large live trees, broadleaf trees, coarse woody debris (CWD), and snag/cavity sites. These elements can provide key habitat components that support the residual populations, the reintroduction of populations expatriated by the disturbance, and overall ecosystem function (Bunnell et al 1999).

Wildlife Tree Patches (WTP's) within managed stands have been shown to be important in the reestablishment or maintenance of a variety of species, including moose (Gasaway and Dubois 1985), and birds (Seip 1997). Residual patches include both islands within the block (internal WTP's) and patches immediately adjacent to logged areas that are also adjoined to unharvested areas (external WTP's). Both internal and external residual patches may be suitable for WTP's provided they can function as sources of habitat elements, which will depend on their site specific attributes. External WTP's connected to adjacent unharvested areas are typically more windfirm within the DFA, and may receive higher initial use by some wildlife species due to the proximity of adjacent unharvested habitats.

Maintaining habitat elements in Wildlife Tree Patches contributes to enhancing species richness by providing the critical features needed to support a variety of species. Designating areas that have composition and structure similar to natural remnants as WTPs will contribute to maintaining a natural



range of variability in ecosystem function. Providing diverse habitat structures, including WTP's, within managed stands is consistent with the pattern of natural disturbances. Fire is the most prevalent natural disturbance in the DFA. Maintaining a component of Wildlife Tree Patches in managed stands over the landscape is analogous to fire 'skips'. Skips occur where areas are burnt, but undamaged or lightly burnt patches persist within the perimeter, or on the edge of the fire within a similar forest type. These residual patches in otherwise disturbed areas typically vary substantially in size, shape and composition, so variability in these characteristics of WTP's is desirable.

WTP's can also be used to protect site-specific habitats, such as mineral licks and raptor nesting sites and provide a source of local genetic material. Following is the guidance provided in the SFMP to prescribing professionals regarding the placement of WTP's:

- Including areas of key site specific habitat importance, such as eagle, osprey, or blue heron nests, mineral licks, and riparian areas,
- In areas with species of concern, locate WTP's consistent with stand level management guidelines where practical,
- Areas of operational concern which can contribute significantly to the provision of key habitat elements (riparian habitats, large live trees, snags or declining trees, large trees, broadleaf trees, CWD, or shrubs),
- Tree species that are uncommon in the LU may provide some unique niche habitats (e.g. cottonwood or birch in the Graham River LU),
- Other wind firm forested stands that can provide these habitat elements,
- WTP's should be retained for the full rotation, unless there are overriding forest health concerns, or as otherwise approved by the MFLNRO, and
- WTP's may be more windfirm if located adjacent to cutblock boundaries.

Comment on slide #24

RE: Species Richness Indicators. SAR Stand Level Management Guidelines.

BRFN Lands Manager: Where is the evidence that this indicator is working to protect wildlife? Who is monitoring the success of these indicators? What have the participants done to ensure effectiveness?

Response: Application of landscape level biodiversity management measures contribute to the maintenance of most of the biodiversity needs in the planning area. These management approaches are "coarse filter", i.e., they represent general measures to conserve a variety of wildlife species.



However, coarse filter approaches may not be sufficient to ensure the conservation of special status species. Fine filter management guidelines are therefore required to ensure that species “at risk” are maintained within the DFA. The Species at Risk Stand Level Management Guidelines indicator measures whether guidelines that may help conserve and manage specific habitat needs for species at risk where they are likely to occur, are being applied.

These guidelines are included in the December 2010 document entitled “Stand-level Management Guidelines for Selected Forest-Dwelling Species in the Fort St. John Timber Supply Area” prepared by Manning, Cooper and Associates for direction. That document summarizes forest dwelling species of interest that may be impacted by forestry operations, the estimated likely geographical extent of the local habitat of these species, the specific niche habitat characteristics applicable to those species, and some stand level management guidelines that may help retain habitat or otherwise support these species.

Species at risk included in the Stand Level Management Guidelines document (SLMG) are derived from reviewing available information and authoritative sources including:

- 5) Federal Species at Risk Act Schedule 1, 2 or 3,
- 6) Provincially red and blue listed forest dwelling species that are directly and negatively impacted by forestry operations,
- 7) Regionally rare species that are sensitive to forestry operations (Sandhill Crane), and
- 8) Information on forest dwelling species from local MOE staff: Local government staff provided input on which local forest dwelling species might benefit significantly by inclusion in the Stand Level Management Guidelines.

With respect to the effectiveness of the management guidelines associated with the indicator, the stand-level management guidelines described in this indicator were developed to provide additional ecological information and achievable operational recommendations for forest resource managers. They were developed by referring to relevant scientific literature and regional reports, reviewing associated provincial management guidelines (e.g., see *Identified Wildlife Management Strategy (IWMS)* (<http://www.env.gov.bc.ca/wld/frpa/iwms/iwms.html>), conducting discussions with other forest managers and species experts, and the authors’ cumulative knowledge, experience and professional judgment.

Forest harvesting alters habitat and may potentially diminish biodiversity (Spies et al. 1988, Hejl et al. 2002). The SFM plan addresses this concern by endeavouring to maintain biodiversity upon its tenure, in part by using indicator species monitored over the long term (see Bunnell et al. 2003). Indicators are classified by Bunnell (2005) as follows:



1. generalists, species that can occupy many different forest types
2. species that can be linked to broad habitat types
3. species linked to specific habitat elements
4. species that use specific or localized habitats
5. species linked to landscape features
6. species not associated with forested habitats

Under Bunnell's plan (Bunnell and Vernier 2007), species grouped into classes two and

three are best suited for large-scale monitoring to assess the potential impacts of forest management activities. In addition, species chosen to serve as biological indicators must (1) be forest dwelling, (2) be sensitive to forest practices employed, (3) be practical to monitor in terms of sampling, identification, and cost, and (4) provide information useful in guiding forest practices (Bunnell et al. 2003).

Because songbirds, especially migratory songbirds, have the ability to modify their presence in an area according to the ability of available habitat to fulfill their foraging and nesting requirements, they are particularly well-suited for use as ecological indicators (Robbins et al. 1986, Canterbury et al. 2000, O'Connell et al. 2000, Carignan and Villard 2002). When the entire forest-dwelling songbird community is preserved, so too is the varied and unique range of habitats which they occupy, which collectively represent a diversity of habitat for other plants and animals (Hutto et al. 1987, Crozier and Niemi 2003, Rempel 2007).

Over the course of 2006-2009, the participants collected baseline data to monitor trends in the populations of songbirds in the Fort St John defined forest area. This data may be assessed in conjunction with additional songbird population data proposed to be collected in the future, in order to assess the effectiveness of the management strategies identified in the SFMP.

BRFN Lands Manager: How are the wildlife features like bear dens and licks protected?

Response: Guidance in the SFMP indicator 9: Wildlife Tree Patches suggests anchoring WTPs over site specific habitat elements such as dens, raptor nests, and mineral licks. Where wildlife features are identified in proposed cutblocks, field staff follow the guidelines identified in the SFMP to manage the features by placing WTPs around them.

Comment on slide #56

RE: Sustainable and Viable Communities.

BRFN Lands Manager: Why are First Nations communities not included in this indicator?

Comment on slide #59

RE: Indicator 23: Value and Total number of contracts awarded to First Nations.

BRFN Lands Manager: Were offers ever extended to First Nations? Where are our offers?

The Participants (Canfor and LP) managed an agreement with 6 local First Nations that provided First Nations with opportunity to engage in harvesting of timber and other activities. The Participants (Canfor and LP) are working with the First Nations to negotiate a new agreement. The Participant's (Canfor and LP) manage a contract with local First Nations Company 6 Nations Ventures, to manage the log yard at Peace Valley OSB. BRFN stated there is minimal benefit to the community from the contract between 6 Nations Ventures and the OSB mill.

Summary of SFMP# 3 Review Discussion with HRFN

Following is the summary of the SFMP# 3 review discussion held with HRFN by email:

McCracken, Jennifer

From: Lyle Mortenson <lyle@lrm.ca>

Sent: Thursday, March 24, 2016 9:55 AM

To: McCracken, Jennifer

Cc: rnotseta@hrfn.ca; referral@hrfn.ca

Subject: RE: review request - Fort St John Pilot Project draft 2016 SFMP

Thanks Jennifer for following up regarding receiving our comments,

I checked and yes I did receive it alright, in December, and did not respond however, providing the terms of our draft



CCUA MOA between Canfor and HRFN are followed, this specifically covers HRFN's main concerns. That will address the

SFMP stage and provide consideration to be included in subsequent plans and PMP's within the CCUA.

We appreciate Canfor's efforts to live up to the draft terms of the MOA.

Regards,

Lyle Mortenson

Forestry Consultant on Behalf of HRFN.

From: McCracken, Jennifer [mailto:Jennifer.McCracken@canfor.com]

Sent: March-23-16 5:13 PM

To: lyle@lrm.ca

Cc: rnotseta@hrfn.ca; referral@hrfn.ca

Subject: FW: review request - Fort St John Pilot Project draft 2016 SFMP

Hi Lyle,

Here is the initial letter from Darrell and I have attached the follow up e-mail from mid February. These two e-mails,

combined with the string attached to my e-mail this morning would be a complete picture of the info-sharing

contacts. Sorry for leaving you off the follow-up e-mail.

Regards,

Jen

From: Regimbald, Darrell

Sent: Friday, December 18, 2015 1:43 PM

Sustainable Forest Management Plan



To: Roslyn Notseta <rnotseta@hrfn.ca>; Lyle Mortenson (lyle@lrm.ca) <lyle@lrm.ca>; Lyle Mortenson

(lylemort@telus.net) <lylemort@telus.net>

Cc: Smith, Stephanie B FLNR:EX (Stephanie.Smith@gov.bc.ca) <Stephanie.Smith@gov.bc.ca>; Ashlyn Exley

(ashlyn.exley@gov.bc.ca) (ashlyn.exley@gov.bc.ca) <ashlyn.exley@gov.bc.ca>; McCracken, Jennifer <Jennifer.McCracken@canfor.com>

Subject: FW: review request - Fort St John Pilot Project draft 2016 SFMP

Roslyn, Lyle,

I hope that you are both well!

Please find attached a request for your First Nations review and comment regarding the Fort St John Pilot Project draft

2016 Sustainable Forest Management Plan (SFMP).

2

A copy of the SFMP has been posted to Fort St. John Pilot Project website and to the Canfor FTP site.

Link to Fort St. John Pilot Project website:

http://www.fsjpilotproject.com/documents/Draft_SFMP_3_Public_Rev_vers_2015_11_25.pdf

Link to Canfor FTP site:

<ftp://ftp.canfor.com/>

User: EcoSystem

Password: F0rest4Tr33s

Please note that "0" in the password "F0rest4Tr33s" is a zero, it is not an "O"!

The SFMP files are stored in the following folder:

<ftp://ftp.canfor.com/outgoing/FSJohn/SFMP/>

Please contact us if you prefer to receive a paper copy of the draft 2016 SFMP.



Please note that the SFMP describes the resource management strategies to be implemented by the Participants within

the Fort St John Timber Supply Area. The SFMP does not identify proposed timber harvest areas and roads, these are

identified in the Forest Operations Schedule, which will be made available for review in mid to late 2016.

Please contact myself, Jennifer McCracken or Stephanie Smith if you have questions regarding the SFMP. We look

forward to discussing the draft SFMP with you.

We wish you all the best for the holiday season, cheers!

Darrell Regimbald, RPF

Planning Coordinator

FMG North

Canadian Forest Products Ltd.

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