



BCTS Chinook Business Area

Report on Review and Comment for Forest Stewardship Plan #768

Haida Gwaii Natural Resource District

Prepared by:

Peter Barss, RPF

BC Timber Sales, Chinook Business Area

Head Office:

46360 Airport Road

Chilliwack, BC

V2P 1A5

This document summarizes First Nation, public and stakeholder consultation related to the application by British Columbia Timber Sales (BCTS) for replacement of the Haida Gwaii Forest Stewardship Plan (FSP) #768.

1. Public Notice of Draft FSP.

The draft FSP was first made available to the public on July 31, 2017. The advertised “Review and Comment” period began July 31 2017 and ended on September 29, 2017, however this was later extended to October 29, 2017. The FSP was advertised in the following locations:

- Haida Gwaii Observer on August 4 and 18, 2017,
- Posted on the BCTS website (made available on July 31, 2017)

Copies of public notices can be viewed in Appendix 1.

2. Information Sharing with First Nations

Letters (sample in Appendix 2) were sent by postal mail and/or email the Council of Haida Nation, Old Massett Village Council and the Skidgate Band Council.

- Initial letters were sent on July 31, 2017
- Follow up emails were sent on August 30, 2017.
- The deadline for review and comment was extended to October 31, 2017.
- A link to digital copies of the maps and documents was provided and a physical copy was made available to the public at the District Office in Queen Charlotte.
- No comments were received in response to these letters (see point 3 below).

Appendix 4 contains a summary of information sharing with First Nations.

3. Consultation and information sharing through the Integrated Solutions Table (IST) comprised of representative of the Council of Haida Nations and the Province of BC

The IST received the initial FSP and supporting document for review on July 31, 2017 and the IST provided preliminary comments to BCTS on November 3, 2017. The FSP was revised and submitted for approval and further IST review on September 25, 2018. Subsequent dialogue between IST and BCTS concluded on September 12, 2019. At the end of this process, the IST released a briefing note that concluded all IST concerns with the FSP documents had been addressed.

Appendix 3 contains the IST Briefing Note. The BCTS responses to comments received from the IST are included within the Briefing Note.

4. Information Sharing with the general public and stakeholders

Letters and emails (sample in Appendix 2) were sent to stakeholders, including municipal, regional and provincial governments, recreation organizations, Crown land tenure holders and other industry organizations.

- Initial letters were sent on July 31, 2017
- Follow up emails were sent as required, on August 30, 2017.
- The deadline for review and comment was extended to October 31, 2017.
- A link to digital copies of the maps and documents was provided and a physical copy was made available to the public at the District Office in Queen Charlotte.

Appendix 4 contains a list of stakeholders contacted, and a summary of the two responses received.

Note that Water License Holders, Trappers and Mineral Tenure holders were not provided personal notifications because the alternate methods of engagement provided many opportunities for review and comment. There were the public advertisement of the FSP, the 5 BCTS public meetings in Haida Gwaii communities and the 4 all licensee meetings in Masset, Port Clements, Skidegate and Sandspit. Also, historically there were no responses from these individuals for previous FSPs.

5. Review and comment by the Stewardship Department of the Haida Gwaii Natural Resource District

Review comments were received by BCTS from the District Stewardship Officer on October 31, 2017. These comments can be found in Appendix 5. These comments were integrated in the IST review and have been responded to as part of that process.

6. Additional Public Engagement

BCTS commitment to public engagement in Haida Gwaii is described in Appendix 12 of the FSP Supporting Document. In support of this commitment, BCTS hosted community meetings to discuss operations, development plans and the draft FSP. These locations and timing of these meetings was as follows:

- September 19, 2017 in Old Masset,
- September 20, 2017 in Masset,
- November 7 in Skidegate
- November 8 in Queen Charlotte, and
- November 9 in Sandspit

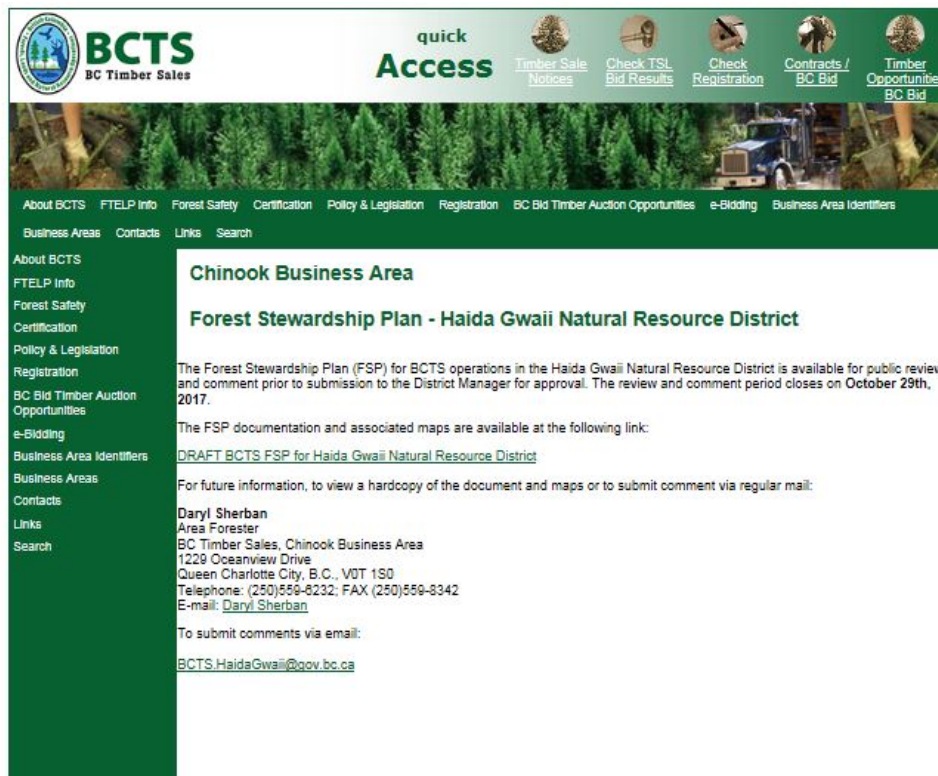
In addition to these public meetings, BCTS participated in 4 all licensee meetings in Masset, Port Clements, Skidegate, April 3, 4, 5 and 6th 2017 respectively.

A summary of the content of the public meetings and comments received is in Appendix 6

Appendix 1

BCTS Haida Gwaii FSP Public Review Notices

- BCTS website advertisement
- Haida Gwaii Observer newspaper advertisements (Aug 4 and Aug 18, 2017)



The screenshot displays the BCTS (BC Timber Sales) website. The header features the BCTS logo and a 'quick Access' section with links to Timber Sale Notices, Check TSL Bid Results, Check Registration, Contracts / BC Bid, and Timber Opportunities BC Bid. Below the header is a navigation bar with links such as About BCTS, FTCLP Info, Forest Safety, Certification, Policy & Legislation, Registration, BC Bid Timber Auction Opportunities, e-Bidding, and Business Area Identifiers. A left sidebar lists various site sections. The main content area is titled 'Chinook Business Area' and 'Forest Stewardship Plan - Haida Gwaii Natural Resource District'. It contains a public review notice for the FSP, stating it is available for review and comment prior to submission to the District Manager for approval. The review and comment period closes on October 29th, 2017. The notice provides a link to the draft FSP documentation and associated maps, and offers contact information for Daryl Sherban, Area Forester, for future information, to view a hardcopy of the document and maps or to submit comment via regular mail. The contact information includes the address: 1229 Oceanview Drive, Queen Charlotte City, B.C., V0T 1S0, and the email: Daryl.Sherban@gov.bc.ca. The website also provides a link to submit comments via email: BCTS.HaidaGwaii@gov.bc.ca.

BCTS
BC Timber Sales

quick
Access

[Timber Sale Notices](#) [Check TSL Bid Results](#) [Check Registration](#) [Contracts / BC Bid](#) [Timber Opportunities BC Bid](#)

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Chinook Business Area

Forest Stewardship Plan - Haida Gwaii Natural Resource District

The Forest Stewardship Plan (FSP) for BCTS operations in the Haida Gwaii Natural Resource District is available for public review and comment prior to submission to the District Manager for approval. The review and comment period closes on **October 29th, 2017**.

The FSP documentation and associated maps are available at the following link:
[DRAFT BCTS FSP for Haida Gwaii Natural Resource District](#)

For future information, to view a hardcopy of the document and maps or to submit comment via regular mail:

Daryl Sherban
Area Forester
BC Timber Sales, Chinook Business Area
1229 Oceanview Drive
Queen Charlotte City, B.C., V0T 1S0
Telephone: (250)559-8232; FAX (250)559-8342
E-mail: Daryl.Sherban@gov.bc.ca

To submit comments via email:
BCTS.HaidaGwaii@gov.bc.ca

Landing in Delkatla in a very rainy July

The sweet month of July has passed us by. We are into migratory action and wet-weather drop-ins. At least 60 Townsend's Warblers passed through town yesterday after a particularly hard down-pour. They fed busily in the dripping trees. It was quite something. We know that songbirds migrate through here, but they are so small and subtle we don't usually see many. In the past, songbirds have landed on B.C. ferries during wet weather. They rest for a while before taking off again. So it was with the warblers yesterday; they had a feed, a rest, and were on their way.

Out over Delkatla, small flocks of swallows race through the air. Some are fully fledged Tree Swallows, brownish with white underparts, that could be mistaken for Northern Rough-winged Swallows. But Rough-wings are darker overall and slightly smaller. They are also very rare on Haida Gwaii. Barn Swallows are also sweeping low over the long grass, picking up insects as they go. They can feed their young in the air, nimble acrobats that they are.

There has been sadness over Barn Swallows recently. A nest of four young showed up at the Nature Centre in a clean box all ready to be fed. They survived for a few days, but they didn't really have a chance. Once the parents have gone there is no one to keep them in that feathery warmth so necessary for survival. They feed well, but often simply die of loneliness and abandonment. Clumsy humans can only try, but it's usually a lost cause from the start. Destroying active Barn Swallow nests has led to their endangerment, and they are now a blue-listed species. Parent birds rarely re-nest successfully in our short summer season. So a generation is gone. However, down the road at a friend's place we are keeping watch to see if their second brood will hatch successfully (thanks Jenny!) and we'll let you know. We live in hope.

The Sandhill Cranes have raised two young successfully in Delkatla this year, and a family of four



A Sandhill Crane chick steps through the Delkatla Wildlife Sanctuary (Peter Hamel/Haida Gwaii Observer)



feeds along the edge of Delkatla at low tide. Interestingly, one young bird, still with downy head feathers, jumped onto one of the large tidal rocks and fed on whatever lived in the crevices. Cranes are omnivorous feeders and take salmon fingerlings as well as plant roots. Now we know they also eat small crustaceans attached to large rocks. They are so stinky and awkward-looking it makes one smile. They are not fully fledged yet, so they won't be leaving for another few weeks.

A small flock of large shorebirds fed near the cranes recently. They were nearly the same colour but had long bills and shorter legs. Marbled Godwits! What a surprise. They are certainly leaving the nesting grounds early. Peter's research shows the godwits that come through here nest north of the Aleutians, in the Bering Sea. What are they doing here so early? They were all adult birds, so maybe, like some of the cranes that spend the summer here, they didn't nest, but drifted down the coast to show up in Delkatla, in July, in the rain.

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250-627-8663 or 1-844-568-4327
Unit 201-515 3rd Ave W, Prince Rupert (Capital Mall)



Gwaii Taxi & Tours



VAN FRIDAYS

Masset - Queen Charlotte -
Skidegate

Leaving Queen Charlotte 11 a.m.

Stops in Tlell and Port Clements and
along the route by the reservation.

Leaving Masset at 1:30 p.m.

To book your seat in our 15 seat Van call:

250 559 2380 or 250 637 1162

(Fares based on pick-up location)

Proposed Forest Stewardship Plan

BC Timber Sales Chinook— Haida Gwaii Natural Resource District

BC Timber Sales (BCTS) Chinook Business Area's proposed Forest Stewardship Plan (FSP) for the Haida Gwaii Natural Resource District is available for review and comment, for a 60-day period, from Monday, July 31, to Tuesday, September 29, 2017. The FSP describes:

- 1) The location of planned areas of interest (Forest Development Unit A) that contains harvesting and road building activities.
- 2) The results and strategies for Forest Development Unit A that are consistent with applicable legislation and objectives set by government. The objectives are described in the Haida Gwaii Land Use Objectives Order, the Forest and Range Practices Act and the associated regulations.

A draft copy of the proposed FSP, and related maps, can be viewed at the Haida Gwaii Natural Resource District office, 1229 Oceanview Drive, Queen Charlotte, during regular business hours or online at:

www.for.gov.bc.ca/BCTS/areas/TCH/FSP-DHG.htm

In order to be considered prior to the final submission of the FSP, written comments must be received on or before Friday, September 29, 2017.

Please forward any comments, concerns or questions to:
Alexandra Ryland, R.P.F., Practices Forester, BC Timber Sales
1229 Oceanview Drive, Queen Charlotte, B.C., V0T 1S0
Email: BCTS.HaidaGwaii@gov.bc.ca
Telephone: 250 559-6255



Haida Gwaii

OBSERVER

COMING EVENTS

OLD MASSETT/GAAW

Culinary Arts dinners.

Mondays, 5 to 7 p.m., Old Massett Community Hall. Enjoy \$15 mains, including barbecued salmon, beef, halibut, or veggie burgers, and \$5 dessert. Call 250-626-7543 for more info.

MASSET

Agate Man Triathlon/hlGa hlk'aats iihlangaa.

Saturday, Aug. 19. Swim 500 metres in Pure Lake, cycle 20 km to the Massett Firehall, and run 6 km around the Delkatla Wildlife Sanctuary. Participants can also compete as a three-person relay team, or do a fun relay with any number of team members. Register at www.hgrec.com or call 250-626-5652.

New library meeting.

Monday, Aug. 21, 6 to 7:30 p.m. Howard Phillips Community Hall. Learn about plans for a new Massett branch of the Vancouver Island Regional Library. Ask library staff for more info.

Burger night.

Thursdays, 4:30 to 6:30 p.m. Dixon Entrance Golf Course.

Heartfulness meditation.

Thursdays at 5:30 p.m., Sundays at 11 a.m. Call 250-626-5400.

AA meeting.

Wednesdays, 8 p.m. St. Paul's Church. Call 250-626-7557.

Council meetings.

Regular council meetings are held the second and last Monday of the month, starting 7 p.m. in the Village of Massett office, 1686 Main Street.

Farmers' Market.

Fridays, 11 a.m. to 2 p.m., until September. On Main Street, across from the credit union. Call 250-626-3768 for info.

PORT CLEMENTS

Council meetings.

Regular council meetings are held the first and third Monday of the month, starting 7 p.m. in the Multiplex council chambers, 36 Cedar Avenue.

Cedarview

Community Church. Services start 11 a.m. Sundays.

TLELL

Tlell Fall Fair.

Sunday, Aug. 6, starting at 10 a.m. Tlell Fall Fairgrounds. Featuring music by Valdy and The Kerplunks, and exhibits from livestock to veggies, needlework to children's colouring. Visit www.tlellfallfair.ca for more info and contest forms.

Edge of the World Music Aug.

11, 12, 13. Tlell Fall Fairgrounds. Hear visiting musicians like The Zolas, Joey Stylez, Dirty Radio, DJ Shub, and Coastal Drifters, plus local acts that include Carsen Gray, JSB | The Natural, Jason Camp & The Posers, Dub Jackson Band, Honey Brown, and The Ramoos. Check out edgefestival.ca for tickets and more info.

Farmers market.

Sundays until Oct. 8, 11 a.m. to 2 p.m. Tlell Fire Hall. Vendors feature Haida art, stained glass, beach-treasure jewelry, knitting, hot lunch, baking, picnic snacks, goat cheese, breads, kombucha, fresh produce and hot coffee. Call 250-559-8282 to book a table.

Taoist Tai Chi.

Tuesdays, 7 to 9 p.m. & Thursdays, 10:30 a.m. to noon. Tlell Fire Hall. Call 250-557-9362 or 250-631-9160.

SKIDEGATE / HLGAAGILDA

"Boreal" opening.

Friday, Aug. 4, starting at 7 p.m. Haida Gwaii Museum. With paper cutout animation, Montreal artist Mandi Morgan creates a "non-linear allegorical tale depicting the vulnerable tensions between wildlife and human destruction." Exhibit runs until Sept. 9.

Kay anniversary

Saturday, Aug. 19, Haida Heritage Centre. Join the Haida Heritage Centre and Haida Gwaii Museum in celebrating the centre's ninth anniversary with kids' games, a salmon dinner, cultural performances and dance competitions.

Haida Gwaii Runners.

Tuesdays, 6:30 p.m. Spirit Lake Trailhead.

AA meeting.

Fridays, 8 p.m. Skidegate Firehall. Call 250-559-4568.

QUEEN CHARLOTTE

Summer art opening.

Friday, Aug. 4, 7 p.m. Junebug Café and Gifts. Enjoy local art, music, and fancy ice cream.

Movie night.

Saturday, Aug. 5, at sunset. Queen Charlotte Community Park.

Volunteer Appreciation Day.

Monday, Aug. 7, 1 p.m. Spirit Square.

Kids fishing derby.

Friday, Aug. 18, 12 p.m. Queen Charlotte dock.

Movie night.

Friday, Aug. 18, at sunset. Spirit Square.

Taoist Tai Chi.

Mondays, 12 p.m.; Wednesdays, 7 p.m.; Saturdays 9 a.m.

QC Community Hall.

Call 250-631-9160.

Ukulele Jam.

Thursdays, 5 to 7 p.m. QC Community Hall Seniors Room. All levels welcome. Informal instruction and extra ukuleles available.

Council meetings.

Regular council meetings are held the first and third Monday of the month, starting 7:30 p.m. at the village office, 903 Oceanview Dr.

Bethel Assembly.

Services start 10:30 a.m. Sundays.

Farmers' market.

Saturdays, 11 a.m. to 2 p.m. Beside the QC Community Hall. Call 250-559-9093 for info.

SANDSPIT

Taoist Tai Chi.

Thursdays, 7 to 8:30 p.m. Sandspit Airport, 1 Airport Rd. Call 250-637-5463, email haidagwaii@taoist.org, or visit www.taoist.org/haidagwaii.

Moresby Market.

11 a.m. to 1 p.m. Sundays. Starts May 28, no market on long weekends. By the gazebo at ALM Elementary. Call 250-640-4289 for info.

Haida Gwaii **OBSERVER****BUSINESS
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405 3rd Ave. East, Prince Rupert, BC V8J 1K7

Haida Gwaii

OBSERVER**Contact us via mail or phone:**

Haida Gwaii Observer

PO Box 205, 623 7th Street,

Queen Charlotte, B.C

Phone: 250-559-4680

sales@haidagwaiiobserver.com

Supernatural music at Tluu Xaada Naay

It was the perfect night for a concert. The sun was shining in the blue sky (our usual weather, right?), with diamonds glistening on the water of Masset Inlet. The first song was, appropriately enough, "Indigenous Rising," with an incredible flute accompaniment. With that we knew the evening would be memorable.

Terri-Lynn Williams-Davidson, whose Haida name is *Gid'ahl-Gudslaay Lalax-aay-gans*, is an activist, an artist, a singer, a dancer, and a lawyer at White Raven Law Corporation. This was the launch of her second album, and her first book, *Out of Concealment: Female Supernatural Beings of Haida Gwaii*. It is completely stunning.

The concert happened before a full house at Tluu Xaada Naay, Christian White's longhouse in Old Massett on Wednesday, Aug. 9. Bill Henderson was on guitar and vocals, and Claire Henderson on flute, saxophone, and vocals. This is one hot band to accompany Terri-Lynn, with some songs in English, and some in Haida language. (My favourite song of the night was "Cedar Sister," and the music is now on constant play in my car.) We were so lucky to witness their first concert on Haida Gwaii; the second one was at Kay Llnagaay in Skidegate the night afterward.

The exhibition at the Kay Centre of the *Female Supernatural Beings of Haida Gwaii* will be up until the end of December. Everyone I have spoken to who has seen it says it is not to be missed. The books and CDs are available at the Chown River Gallery, which is eight kilometres east of Massett, and at Sarah's Longhouse in Old Massett. I have already begun reading the book, and found the introductions



by famed anthropologist and explorer Wade Davis and elder Diane Brown very intriguing. If you are in Vancouver on Aug. 27, they will be performing at the Vancouver East Cultural Centre, a venue which is pretty stellar.

I am sure that the Agate Man Triathlon/híGahik'aats iihlangaa will be a great success on Saturday, Aug. 19. Between swimming in Pure Lake, cycling to the Massett firehall, and running around the Delkatla Sanctuary, how could you not have fun?

There is a meeting about the new library on Monday, Aug. 21 from 6 to 7 p.m. at the Howard Phillips Hall. You will learn about the plans for a new library for Massett, which is a branch of the Vancouver Island Regional Library system. If you do not have a library card, get to the library and get one: they are open Tuesdays, 10 a.m. to 12 p.m. and 1 to 5 p.m.; Thursdays from 1 to 4 p.m. and 5 to 9 p.m.; and Fridays from 1 to 5 p.m.; and Saturdays from 10 a.m. to 2 p.m. You can borrow CDs, books, DVDs, magazines, chill in one of their comfy chairs, and use a computer. I think that libraries are the heart of our communities. A library card is free and opens up so many doors for our leisure activities.

For people who live here, and who are



Singer Terri-Lynn Williams-Davidson describes her latest album, *Grizzly Bear Town*, as "cutting-edge ancient." After giving performances in Old Massett and Skidegate, Williams-Davidson is set to perform on Aug. 27 in Vancouver. (Jilakuns portrait by Terri-Lynn Williams-Davidson)

visiting Haida Gwaii, we have a great little farmers' market across from the credit union on Fridays between 11 a.m. and p.m. There are a variety of vendors who have homemade items for sale, ranging from free-range eggs (well, the chickens are free range) to jams, bread, art, and much more.

Masset really is magic! Enjoy your last couple of weeks of summer and see you back here on Sept. 1. Please get your new to me by Aug. 24.

PUBLIC NOTICE: Site C Inquiry Initiated

The BC Utilities Commission (BCUC) has initiated an inquiry into BC Hydro's Site C project, as directed by the Provincial Government in Order-in-Council (OIC) 244 on August 2, 2017.

The full scope of the inquiry is set out in the government's terms of reference for the OIC, which is available online: <http://www.bcuc.com/SiteCinquiry.html>.

The inquiry will be handled in two phases. In the first phase, the BCUC will gather information and produce a preliminary report. Those parties who would like to submit data and analysis to be considered for inclusion in the preliminary report are invited to submit that by no later than August 30, 2017. Data and analysis submitted during this first phase must be within the scope of the OIC.

Opportunity for public comment on the preliminary report will be provided during the second phase of the review. Process details for the second phase will be provided once established.

GET MORE INFORMATION

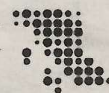
To find out more about how to file data and analysis on the questions above, please check our Site C website at: <http://www.bcuc.com/SiteCinquiry.html>. The BCUC will make arrangements with members of the public not able to access or submit information online. In these instances, please contact our office using the contact information below.

British Columbia Utilities Commission

Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

P: 604.660.4700
TF: 1.800.663.1385

E: Commission.Secretary@bcuc.com



bcuc
British Columbia
Utilities Commission

All documents filed on the public record may be made publically available on our website at www.bcuc.com.

Proposed Forest Stewardship Plan**BC Timber Sales Chinook –
Haida Gwaii Natural Resource District**

BC Timber Sales (BCTS) Chinook Business Area's proposed Forest Stewardship Plan (FSP) for the Haida Gwaii Natural Resource District is available for review and comment, for a 60-day period, from Monday, July 31, to Tuesday, September 29, 2017. The FSP describes:

- 1) The location of planned areas of interest (Forest Development Unit A) that contains harvesting and road building activities.
- 2) The results and strategies for Forest Development Unit A that are consistent with applicable legislation and objectives set by government. The objectives are described in the Haida Gwaii Land Use Objectives Order, the Forest and Range Practices Act and the associated regulations.

A draft copy of the proposed FSP, and related maps, can be viewed at the Haida Gwaii Natural Resource District office, 1229 Oceanview Drive, Queen Charlotte, during regular business hours or online at:

www.for.gov.bc.ca/BCTS/areas/TCH/FSP-DHG.htm

In order to be considered prior to the final submission of the FSP, written comments must be received on or before Friday, September 29, 2017.

Please forward any comments, concerns or questions to:
Alexandra Ryland, R.P.F., Practices Forester, BC Timber Sales
1229 Oceanview Drive, Queen Charlotte, B.C., V0T 1S0
Email: BCTS.HaidaGwaii@gov.bc.ca
Telephone: 250 559-6255



**BRITISH
COLUMBIA**

WWW.HAIDAGWAIIOBSERVER.COM

Appendix 2

Referral letters sent (Example of referral letters sent to First Nations and to Stakeholders)



File: 18046-30/FSP-DHG

July 31, 2017

Leonard Munt
District Manager, Haida Gwaii Natural Resource District
Ministry of Forests, Lands, Natural Resource Operations and Rural Development
1229 Oceanview Drive
Queen Charlotte, British Columbia
V0T 1S0

VIA EMAIL

Re: Initiation of Public Review and Comment for BCTS Haida Gwaii Replacement FSP

Dear Leonard:

Please consider this letter as notice that BC Timber Sales has completed a replacement FSP for the Haida Gwaii Natural Resource District. The draft FSP document is being circulated to the Haida Nation and stakeholders for review and comment. BC Timber Sales is requesting responses from stakeholders by September 29th, 2017.

Any future comments or questions regarding the draft FSP, please contact me at Alexandra.Ryland@gov.bc.ca.

Yours truly,

Alexandra Ryland, RPF
Practices Forester
BC Timber Sales
Chinook Business Area

From: [Ryland, Alexandra FLNR:EX](#)
To: ["chn.skidegate@haidanation.com"](#); ["chn.hts@haidanation.com"](#)
Subject: Initiation of Public Review and Comment for BCTS Haida Gwaii Replacement FSP
Date: July 31, 2017 12:50:00 PM
Attachments: [Letter to Council of the Haida Nation - BCTS Haida Gwaii FSP.pdf](#)
[image002.png](#)

Please accept the attached referral letter for BC Timber Sales draft Forest Stewardship Plan (FSP) for the Haida Gwaii Natural Resource District. BCTS intends to submit the FSP for review and approval by the Delegated Decision Maker on October 2nd, 2017. As stated in the attached letter, we are requesting any comments or questions regarding our draft FSP to be submitted by **September 29th, 2017**.

The draft FSP can be viewed and downloaded from the following link:

<https://www.for.gov.bc.ca/BCTS/areas/TCH/FSP-DHG.htm>

If you have any questions, please contact me.

Thank-you,



Alexandra Ryland, MFC, RPF

Practices Forester

BC Timber Sales | Chinook Business Area, Haida Gwaii

Phone (250) 559-6255 | Fax (250) 559-8342

Forests, Lands and Natural Resource Operations



File: 18046-30/FSP-DHG

July 31, 2017

Council of the Haida Nation
#1 Reservoir Road
HlGaagilda (Skidegate), BC, V0T 1S1
chn.skidegate@haidanation.com

Council of the Haida Nation
504 Naanii Street
Gaaw (Old Massett), BC, V0T 1M0
chn.hts@haidanation.com

VIA EMAIL

Re: Initiation of Public Review and Comment for BCTS Haida Gwaii Replacement FSP

Dear Council of the Haida Nation:

BC Timber Sales (BCTS) has prepared a replacement Forest Stewardship Plan (FSP). Our replacement FSP applies to the entire Haida Gwaii Natural Resource District and overlaps your traditional territory.

The review and comment period for our draft FSP is open through to September 29th, 2017. As such, we are requesting any comments or questions regarding our draft FSP prior to submittal to the District Manager for approval.

To view a hard copy of the FSP document and maps, or to submit comments via regular mail:

Alexandra Ryland, RPF
Practices Forester
BC Timber Sales - Chinook Business Area - Haida Gwaii Field Team
Haida Gwaii Natural Resource District
1229 Oceanview Drive
PO Box 39
Queen Charlotte, BC, V0T 1S0

A digital version of the FSP document and maps can be downloaded from:
<https://www.for.gov.bc.ca/BCTS/areas/TCH/FSP-DHG.htm>

Page 1 of 2

Please provide any comments regarding the draft FSP by **September 29th, 2017**. Please do not hesitate to call me at (250) 559-6255 with any questions or to set up a meeting to discuss the draft FSP content in detail. Comments and questions can also be submitted to BCTS.HaidaGwaii@gov.bc.ca.

Yours truly,

A handwritten signature in blue ink that reads "Alex Ryland". The signature is fluid and cursive, with the first name "Alex" and last name "Ryland" clearly distinguishable.

Alexandra Ryland, RPF
Practices Forester
BC Timber Sales
Chinook Business Area



File: 18046-30/FSP-DHG

July 31, 2017

Janine North
Misty Isles Economic Development Society
113 Oceanview Drive
PO Box 652
Queen Charlotte, BC, V0T 1S0
janine@gohaidagwaii.ca

VIA EMAIL

Re: Initiation of Public Review and Comment for BCTS Haida Gwaii Replacement FSP

Dear Janine,

Please consider this letter as notice that BCTS has completed a replacement FSP for the Haida Gwaii Natural Resource District. The draft FSP document is being circulated to applicable stakeholders for review and comment. This referral is being sent because BCTS is aware that your organization has an interest in the area to which the plan applies.

The review and comment period for our draft FSP is open through to September 29th, 2017. As such, we are requesting any comments or questions regarding our draft FSP prior to submittal to the District Manager for approval.

To view a hard copy of the FSP document and maps, or to submit comments via regular mail:

Alexandra Ryland, RPF
Practices Forester
BC Timber Sales - Chinook Business Area - Haida Gwaii Field Team
Haida Gwaii Natural Resource District
1229 Oceanview Drive
PO Box 39
Queen Charlotte, BC, V0T 1S0

Digital versions of the FSP document and maps can be downloaded from:

<https://www.for.gov.bc.ca/BCTS/areas/TCH/FSP-DHG.htm>

Please provide any comments regarding the draft FSP by **September 29th, 2017**. Please do not hesitate to call me at (250) 559-6255 with any questions or to set up a meeting to discuss the draft FSP content in detail. Comments and questions can also be submitted to BCTS.HaidaGwaii@gov.bc.ca.

Thank you kindly,

A handwritten signature in blue ink, reading "Alex Ryland". The signature is fluid and cursive, with the first name "Alex" and last name "Ryland" clearly distinguishable.

Alexandra Ryland, RPF
Practices Forester
BC Timber Sales
Chinook Business Area

Appendix 3

Briefing Note summarizing the technical review by the Integrated Solutions Table (IST)



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Unique Identifier:	BCTS 2018-2023 FSP 13-Mar-18
Submitted for sorting:	December 17th, 2018
Decision Makers:	Leonard Munt (Prov); HNRC (CHN)
Prepared by:	Sean Muise (Stewardship Officer)

Sorting

Comments	Date Sorted	Scenario
Forest Act, Forest and Range Practices Act, Sorted at table - Forest Stewardship Plan – New	Dec. 20 th , 2018	S2

Application Summary:

Forest Stewardship Plan submission from BC Timber Sales (Chinook Business Area), pursuant to s. 8 (2) (b) of the *Forest & Range Practices Act*.

Preliminary Draft Submission	July 31, 2017
Initiation of Public Review & Comment Period	July 31, 2017
Preliminary IST feedback to Licensee	November 3, 2017
Conclusion of Public Review & Comment Period	September 29, 2017
Primary Submission for Approval (via FSP tracker)	September 25, 2018
IST Feedback on September FSP version provided to Licensee	August 30, 2018
Second Submission for Approval (via FSP tracker)	November 16, 2018
Third submission for Approval	Feb.14, 2019
Fourth Submission for Approval	March 13, 2019

There was significant change in content from the original (July 2017) draft to the second submission for approval (November 2018). This included changes to the Visuals, Cultural, Aquatic, Wildlife and Invasive Plant sections, where major changes were made with no additional rationale provided and no information tracking what changes had been made. This essentially required a complete re-review of the entire document by IST, which found numerous other changes and generated many new comments by the IST. Through to the third submission for approval (February 14, 2019), some changes have been made to address IST comments, while other IST comments have been left outstanding (not addressed).



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Background:

A. Location: Forest Development Unit A (FDU) (area to which the FSP applies) spans the entire Timber Supply Area is displayed in Appendix A of the FSP

B. Cultural Values: as per applicable LUOO objectives reflected in results/strategies

The Haida People are the Stewards of Haida Gwaii and have inherent responsibilities to protect all living things of the lands and waters of Haida Gwaii.

Cultural values within the timber supply area (TSA) include but are not limited to those that are identified and protected in the Haida Gwaii Land Use Objectives Order (cultural features including any Haida traditional forest feature, Haida traditional heritage feature, culturally modified tree or monumental cedar; aquatic habitats and species; and plants and wildlife and ecosystems on which they depend.

Cultural values also include "heritage sites", which means a location, an area or a space the Haida people identify as being culturally or historically significant and may include watersheds, sacred sites, trails, burial sites, caves, archaeological objects, and archaeological forests. Supernatural places are of high value to the Haida people and must be protected. Maintaining visual quality along highway corridors and waterways is also part of Haida cultural values.

Haida Citizens have a right of access to all Haida Gwaii resources for cultural reasons, and for food, or commerce consistent with the Laws of Nature, as reflected in the Laws of the Haida Nation.

C. Fish/Riparian Values: as per applicable LUOO objectives reflected in results/strategies

D. Hydrology: as per applicable LUOO objectives reflected in results/strategies

E. CMTs: as per applicable LUOO objectives reflected in results/strategies

F. Statusing (spatial conflicts): Community Forest areas fall within the TSA

G. Other Agency Comments: Licensee submitted email on March 19, 2018 that the only comments received on the FSP were those from the IST (no public or other agency comments)



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H. Cruise/Appraisal Information: n/a

IST Review:

The original draft FSP was reviewed independently by both the Province (HGNERD Stewardship Section) and the Haida Nation (CHN HNRD). Comments were combined and placed into 3 categories (Needs Clarification, Requires More Info/Context, may not be Consistent With Objective) and were forwarded to BCTS (the licensee). The lead contact was initially Alex Ryland, Practices Forester, but in the fall of 2017 she moved on to a new position and the draft FSP was shelved until the spring of 2018. When the licensee submitted their final copy for approval in September 2018, both technical teams provided input as the Integrated Stewardship Team (IST) completed a comprehensive review. The results of this review were then shared with the licensee who decided to reconfigure parts of the FSP before it moved on to the next phase of review at the Solutions Table. The subsequent November 2018 submission was reviewed by representatives of the IST [Sean Muise (HGNERD), Marlene Liddle (CHN HNRD), and Jeremy Calhoun (CHN HNRD)] to identify where there were still outstanding items that have yet to be addressed. In addition to the IST review, Mark Salzl (HGNERD) and Denise McLean (FLNRORD Invasive Plant Specialist) provided additional comments related to stocking standards and IP concerns. On December 3rd, 2018, Sean Muise, Jeremy Calhoun and Marlene Liddle reviewed BCTS's November 16, 2018 revised FSP Submission in context of the outstanding items noted below, and recorded whether they have been addressed.



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In February 2019, BCTS resubmitted their FSP and Supporting Documentation to the IST and the ST. On March 13/19, it was officially uploaded to the FSP Tracker.

Text below in green represent original IST comments submitted to the licensee in 2017.

Blue text represents responses received by the licensee.

Red text denotes subsequent Stewardship review in November 2018, February 2019, and March 14th, 2019.

Text in black represents Solutions Table member comments

The following elements are minor clarifications and/or typos to address:

FSP Section	FSP Heading	Date	From	ST Y/N	Outstanding Concern
3.0	Application: Tables 2 &3				Active RP's and TSL's that were non-consensus at Solutions Table should be identified. <i>Active TSL's in Table 2 are issued and the solutions table status is not relevant given that they are legal tenures. All areas listed in Table 3 are consensus and declared and carried forward into this plan. This has been a key expectation for all of the FSP's submitted and approved so far. Change made. Addressed (IST).</i>
6.13	Cedar Harvest				<i>Calculation or equation used needs clarification (ie. Units, partition volume, etc.). No supporting documentation or reference to Ministerial direction. Clarification has been added and the Ministerial Direction letter included in the Supporting Document. Addressed (IST).</i>
6.54 (a)	Type 1 Fish Habitat				Typo – reference to s.6.51 is not accurate. <i>No Change. Corrected. Addressed (IST).</i>
6.105	NSWO Core Nesting Areas				How will the spatial distribution of NSWO core nesting areas be measured or delineated? <i>Reporting moved to Table 5. No evidence of this in Table 5. The BCTS NSWO strategy is consistent with the LUO. Reporting of core nesting areas is not required. Have explained why it doesn't exist in Table 5 but have not answered initial question. Low risk – not required in other FSP's.</i>
Appx A	FSP Map				FDU A is not clearly delineated. <i>Working on a new map. Need to review new map. The map has been updated to clarify the FDU boundary as well as add place names, rivers, roads and recreation sites and trails. Significant changes made to improve the map – black outline of TFL's is confusing</i>



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					<i>as all THLB seems to be included in FDU.</i>
		May 14, 2019	IST	N	<i>Though limited in utility for public engagement, this map meets all of the FRPA and HGLUOO requirements. FDU Map was compared to Taan Map for consistency and it was observed that Taan has also included extra area on the TSA to account for future tenure opportunities. Suggest proceeding as is.</i>
		August 29, 2019	ST		See Solutions Table discussion below

The following elements of the most recently submitted draft FSP are deemed to pose a **low to moderate risk** to resource values if approved. Some of these components represent unanswered questions that may not fundamentally impact the practices on ground (post-approval) nor will they create significant inconsistency with statutory objectives:

FSP Section	FSP Heading	Date	From	ST Y/N	Outstanding Concern
1.0	Clarifications: Qualified Professional				<i>“Active Bear Den” – QP is defined in the LUOO and has specific meaning. Is this the intent or is this meant to be a “qualified individual”? This is the intent. This eliminates qualified and trained individuals from identification of dens. No change in March submission but low risk as similar wording was used in the Husby FSP.</i>
		May 14, 2019	IST	N	IST has confirmed that the use of the term “active bear dens” only applies to restricted activity during hibernation season. The protection of <u>all</u> bear dens (regardless of activity) is still being made. Suggest proceeding as is (IST).
1.0	Clarifications: Disclaimer				<i>Disclaimers – regarding LUOO/Schedules – this clarification seems to exempt the Plan holder from adjusting strategies to conform to LUOO amendments; this may not be consistent with LUOO. Very narrow reading of this clause. The clause provides a frame of reference for the clauses that are cited to ensure that amendment occurs as required as the LUOO does not contain language stating when amendment is required same intent as designations in effect Table 1. LUOO specifies 6 month transition – wording is confusing. Why is it pertinent to include? No change has been made. The same wording is in both the TAAN and Husby FSP and is important to protect the FSP holder in the event of changes to Order or Schedules that we have not been made aware of. This does not exempt the Plan Holder from adjusting strategies and/or amending the</i>



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					<i>FSP to conform to amendments to the Order when notified and provided transition time. No change, but low risk.</i>
4.0	Term	May 14, 2019	IST	N	Concern regarding CHN DDM not be included may be lower risk as “DDM” in the Clarifications section refers to “delegated decision maker(s)”. There is no specification that the DDM is from the Province side only. The plural insinuates that there is more than one DDM and there would not be two DDMs from the province, meaning that ultimately one of the DDMs would be from CHN. Suggest proceeding as is (IST).
6.19; 6.20; 6.23; 6.24; 6.27; 6.28; 6.32 6.20-6.34	Cultural Cedar Stands; CMT’s; Monumental Cedar				It is not clear what types of situations would be applicable where operational feasibility would be a potential rationale for removing CCS/CMT/MC or reducing reserve zone; as LUOO does not list operational feasibility as an option; suggest adding info in Supp Doc. <i>Rephrased to not practicable the definition of which is defined as three simple scenarios increased difficulty, steps or cost. Low risk – definition of “operational feasibility” has been enhanced and all situations include an IGP.</i>
Various	Identification Training (AFU’s, Nests, Bear Dens, Monumental Cedar, Invasive Plants				During the term of the last FSP it was observed that there was risk associated with incomplete or inaccurate identification of several values managed for under the LUOO. Concerns in this regard were raised by the IST in the FSP extension review (2016, 2017) and an expectation to provide identification training for these values was articulated early in the planning process. <i>A description of BCTS training requirements and commitments has been added to the Supporting Document, titled “Training and Qualifications”. Addressed (IST).</i>

The following elements of the most recently submitted draft FSP are deemed to pose a **moderate to high risk** to resource values if approved:

FSP Section	FSP Heading	Date	From	ST Y/N	Outstanding Concern



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1.0	Clarifications: Tree Length				<p>"Tree Length" - Ambiguity gray area around what is adjacent; using the predominant site series for the cutblock to apply a Schedule 5 reserve on a stream does not meet intent and has been problematic in the past (i.e. should be the site series that the stream is within, not that of the adjacent harvest area) where does the LUOO say this? <i>Changed to say the dominant site series in the reserve and management zone for both. "Area or adjacent to the feature" as stated in the LUOO are not measurable so have said tree length will be based on dominant site series in the reserve and management zone. Does not consider the height of the feature. No further changes have been made. The BCTS definition of Tree Length is consistent with the working in the LUOO: the LUOO definition does not consider the height of the feature. The original comment requested BCTS clarify what is considered adjacent and this has been done, as described in the adjacent column. Still unresolved ambiguity around what is used as the accepted height – ie. if a super-canopy monumental is the feature and it is the tallest tree on site then it needs to be the default.</i></p>
		May 14-2019	IST	N	<p>The licensee has ensured that the definition is aligned and consistent with the HGLUOO. IST acknowledges that super canopy trees may already be acclimated to endemic wind conditions. <i>Suggest proceeding as is (IST).</i></p>
6.2	CSA's				<p><i>CHN CSA Management Plan has not been referenced or included in Supp Doc. The CHN management plan is now referenced and included in the Supporting Document. Addressed (IST).</i></p>
6.3	CFI				<p>A georeferenced submission should be submitted 30 days prior to ECAS submission. <i>This is requirement is not relevant to the BCTS process as maps will be submitted with the consultation package which occurs before ECAS submission. The submission of CFI data 30 days prior to cutting authority submission is critical to the quality assurance program. Changed to required georeferenced submission 30 days prior to ECAS submission. Addressed (IST).</i></p>
6.2	HTHF's				<p><i>The strategy for HTHF's does not address known sites. Text added: "Known and potential HTHFs will be identified" Addressed (IST).</i></p>
6.4 – 6.7	HTHF's				<p>Have not addressed the need for alteration permits with Class 2 features. <i>BCTS does not intend to alter these features and would only be requesting variance to the buffer if required. This should be explicit in the strategy or sup doc. No change has been made. Retention of Class 2 features is explicit in section 6.6: "Where Class 2 HTHFs are located they will be retained....." As stated, the IGP is required only if requesting a reduced buffer. Addressed (IST).</i></p>



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6.7	HTHF's				s.6.6 is not in accordance to GAR of the FRPA. <i>Clarified wording to ensure Karst Features as identified under the LUOO are inclusive of the GAR order. Still doesn't recognize that the GAR Order and LUOO are mutually exclusive legal instruments. Clause added to comply with GAR Order. Addressed (IST).</i>
6.13	Cedar Management				<i>5 Year Strategy does not align with the CHN expectation for <= 110% of annual target being the ceiling of what can be harvest in any given year (ie. with 100% met over 5 years). Changed to clarify our Cedar harvest strategy, reference the Ministerial direction, specify 5 year harvest and annual harvest levels, and limit the maximum cut to 100% over 5 years. Following cut control guidance, we have specified we will sell up to 120% in any given year. Still does not align with CHN expectation re: annual targets. Needs discussion.</i>
6.13	Cedar Management (harvest reporting)	May 14, 2019	IST	N	<i>As per the signed FSP Implementation Agreement and will be in accordance with CHN/Prov parameters – Low risk. Suggest proceeding as is (IST)..</i>
6.13	Cedar Management (harvest)	May 14, 2019	IST	N	<i>This discrepancy really comes down to what the licensee is proposing as an annual sales volume (120% of the proportional cedar harvest target) versus what the CHN is comfortable with (110% of the proportional cedar harvest target). BCTS has committed to Ministerial direction in the FSP, therefore legally binding their commitment to not overharvest cedar during a cut control period but concern still exists around how the partition will be met and monitored. Suggest further discussion at ST.</i>
	Cedar Management (harvest)	May 16, 2019	Lic	N	<i>Our (BCTS) strategy clearly indicates our firm commitment to the cedar partition and I encourage further discussion at the ST over the merits of the increased flexibility we have proposed in achieving the partition.</i>
6.19	Western Yew Retention				<i>No strategy to address the CHN expectation for harvested Yew to be provided to the Cultural Wood Access Program. Supporting Document includes new BCTS HG Western Yew BMP to address this concern. Addressed (IST).</i>
			IST	N	<i>Just like Taan, BCTS has clearly described their procedure for providing incidentally harvested Yew Trees to the cultural wood access program in their Supporting Info. Suggest proceeding as is</i>



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6.18; 6.19	Western Yew Retention				<p>The default target is for 100% of the individual yew stems to be retained in stand level retention. It's not clear what is happening with the yew that is not excluded from the NAR (ie. Use of non-merch, innovative harvest practice, etc); no rationale or context behind the 60% target – also not clear if this is 60% of 40% or 60% of total (75% was from the CHN Monitoring Report); more Supp Info needed; will harvested yew stems be provided to the CWAP. <i>The LUOO does not require 100% retention of individual stems. It requires retention of 100% of patches s8.1</i></p> <p><i>6.18 Provided the statement that 60% of individual stems in the development area will be retained in retention patches and the remainder as individual stems in the harvest area which is a higher standard than the majority in Taan's FSP. 6.19 threshold for engaging in IGP will be if retention of <50% of individual stems in the harvest area is not practicable will engage in an IGP. With these targets an overall of 80% of stems will be retained unlike TAAN which Has a target of 75% of stems in the development area. No change and nothing noted for western yew in the sup doc. Strategy rewritten to align with other HG FSPs. CHN monitoring report referenced in Supporting Document. BMP added to SD which is intended to increase retention / protection of yew during harvesting. Addressed (IST).</i></p>
6.36	Monumental Cedar				<p>Monumental Cedar tracking process needs to be more explicit; could elaborate in Supp Doc. <i>Cannot be more specific due to legal issues with ownership of the trees. Cannot identify them as reserved timber as then they could not be cut. No change and nothing noted for Mon Cedar tracking (post-harvest) in the sup doc. Monumental Cedar tracking process is now included in a new BMP added to the Supporting Document. Addressed (IST).</i></p>
6.44	Public Engagement				<p>30 days may still not be enough time for adequate engagement; suggest sharing development plans 1 to 3 years in advance; during the public "opportunity to comment", how will comments be considered or addressed? <i>Changed to 60 days. Our policy is to share operating plans yearly and show blocks from previous operating plans until sold. We cannot predict how comments will be addressed in advance of knowing the nature of the comment. If the policy is to share operating plans yearly then why not specify that in strategy or sup doc? Wording changed to include annual updating of publicly available development plans. The BCTS Haida Gwaii communication strategy is included in the supporting document. Addressed (IST).</i></p>



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6.49	Annual Reporting				<p>Suggest submitting spatial with cutting authority or ECAS submission. <i>Will be submitted at declaration of the block. This is not explicit anywhere in this section and is not aligned with the expectation of submitting data upon discovery or in advance of consultation. No change. 6.47 explicitly states we submit spatial. Data may not necessarily be reported upon discovery, as we may not pursue development in an area and therefore do not complete a CFI survey. Recce data is not appropriate to submit unless we have properly completed a plan. We have made changes to 6.44 and 6.3 that addresses additional reporting measures. All other licensees report data upon discovery as well as Annual Reporting. This is critical for planning purposes. Needs more discussion.</i></p>
		May 14, 2019	IST	N	<p>Every other FSP approved in the last 2 years has a provision to submit spatially explicit data to the CHN/Prov in an agreed upon format at the cutting authority submission stage. This facilitates timely QA on CFI data. This is acknowledged in the BCTS BMP's for Monumental and Yew (in the Supporting Doc) but not evident in this section. <u>While there are no legal requirements under the LUOO or FRPA that requires licensees to provide digital information in a manner suitable to the CHN (i.e shapefiles, .kml, .gdb), clarifying expectations in this regard could streamline the Audit process, approval process and for annual information sharing, which would be beneficial for BCTS. Suggest further discussion at ST.</u></p>
		May 16, 2019	Lic	N	<p>Our (BCTS) practice has been to provide all required information to the Solutions Table for the review of our proposed developments... wording allows for the Solutions Table to set standards for submissions and to regularly update those standards without forcing a FSP amendment. If additional clarification is required, we propose, if necessary, modifying this section to read... The Timber Sales Manager will adhere to requirements of the Haida Gwaii Management Council and the Solutions Table for the development area referral process, <u>the timber sale (cutting authority) review process, and for all related</u> spatial database uploads.</p> <p>August 23, 2019, BCTS response: FSP clauses 6.43 and 6.49 have been modified and clause 6.50 added, to clarify our commitment and current practice, which is to submit spatial data to the Solutions Table at the cutting authority stage. The wording of 6.49 is consistent with the approach of Taan in their approved FSP. Note that BCTS issues Timber Sale Licences, not Cutting Permits, so where Forest Licences holders specify "Cutting Permit" and "Road Permit" submissions, BCTS has specified "Timber Sale Licence" as the cutting authority.</p>



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					<i>Solutions Table confirms the amendment meets the expectations of concerns above and consistent with Taan FSP.</i>
6.50 – 6.52	Visual Quality				<i>This is not measurable or consistent with the FPPR as it self-exempts the licensee from eVQO's. Have changed the language to state the SP will capture the extent / impact of the variance. Still provides self-exemption. As requested, this section has been removed from the FSP. Addressed (IST).</i>
6.50 – 6.52	Visual Quality				<i>Significant discussions regarding roadside harvest and foreground visual landscape alteration has not been addressed in this section. This will not be addressed in the FSP. These concerns will be block specific and addressed through public review and comment at the operating plan. Why isn't this more explicit in the strategy or supporting doc? Added clause regarding visual management when adjacent to highway corridor. Addressed (IST).</i>
6.74	Retention of Trees in RMZ's				<i>Conflicts with stocking standards. BA retention can't be >5m2/ha for even aged standards. Will deal with this at the prescription phase. Stratum would need to be greater than 0.25 ha and generally will be less than 5m2/ha. This needs to be qualified in the strategy and must be measurable. No change made. The BCTS strategy is clear and is consistent with all other approved FSPs in Chinook BA. Note that SEDRSS indicates approx. 19 m2/ha BA before understory is significantly impacted by overstory. It is unlikely that this would ever create a large enough contiguous stratum (>1ha) to require stratification, and if this ever occurs it will be addressed in the prescription or through an amendment. Low risk – may not have significant affect on landscape. Relies on prescription.</i>
6.91	Black Bear Dens				<i>Auditory disturbance like hauling and road maintenance during hibernation have been brought up as a concern at the ST – suggest considering the inclusion of an IGP. Additional issues will be dealt with at solutions table if the den is active. This is what an IGP is. Should include this as part of the strategy. Wording changed to be consistent with other HG licensee FSPs. IGP process added to provide for exceptions. Addressed (IST).</i>
7.1	IP (IPMA plant list)				<i>No reference to the HG IPMA Plant List – this is the core list that is supported by the NWIPC. Under law only need to refer to Invasive plant regulation of FRPA. BMP in supporting documents lists plants that BCTS will consider and uses IAPP tool to track and report. The expectation is that</i>



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					<i>all licensees are managing to the HG IPMA Plant List. The BCTS Invasive Plants BMP has been modified to include the HG plant list. This is referenced in Section 1.0 of the FSP and the BMP is included in the Supporting Document. All other licensees reference this list in their FSP, not the Supp Doc. ST should consider the risk this creates. (see FSP s.7.1)</i>
7.1	IP (IPMA plant list)	May 14, 2019	IST	N	<i>Location of the IPMA Plant List. This list is subject to change over the course of the FSP. To address this other FSP holders simply state that they will use the most up to date HG IPMA Priority Plant List. BCTS has decided to reference the BMP they have in the Supporting Doc. This raises several questions: Is the list static in the BMP? Is this section of the Supp Doc being put before SDM's for determination? Should this info be housed in inside of the FSP in the Measures section or as an Appendix? IST believes this section is moderate risk. Potentially there is quite good framework for IP management, it just seems that this piece may confusing to bring to determination and ultimately to assess over the implementation of the FSP. Suggest further discussion at ST.</i>
7.1	IP (IPMA plant list)	May 16, 2019	Lic	N	<i>S.7.1 The Timber Sales Manager will adhere to the current BCTS Chinook Invasive Plant BMP, which includes as Appendix D, the Haida Gwaii IPMA Plant List. <u>Wording proposed change to</u> "This BMP will be updated to include changes to the IPMA Plant Lists as they are made available. The BMP is included as Appendix 20 of the FSP Supporting Document."</i>
7.0	IP			Y	<i>All of the emphasis in these measures is on grass-seeding. Need measures for what controls are in place to reduce risk of spread from contractors (ie. Equipment management, training, inspections); Need measures to consider action plans for development in areas that are infested; Needs measures for brushing. This is not correct. s7.0 includes measures for equipment management, training and inspections. As per SOP and BMP, the measures specified address methods to avoid / minimize spread if operations occur near known IP infestations. The BCTS IP SOP and BMP have been updated to include all contractors in the field (including brushing). s7.9 added. Provides measures for roadside brushing – added for consistency with other HG FSPs. Addressed (IST).</i>



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7.2	IP			Y	<p><i>Simply reviewing the database for reported occurrences is a narrow application of this measure – should consider field review. This measure limits the application to soil disturbance – should be applicable to any field activity.</i></p> <p><i>(a) The review comment does not reflect the content of the Invasive Plants measures outlined in the FSP and Supporting Document: the BCTS measures clearly goes beyond “simply reviewing the database”.</i></p> <p><i>(b) The “introduction or spread” of invasive plants, as per FRPA, must be linked to a “forest practice”. A “field activity” has no definition and is therefore not measurable so this term has been changed.</i></p> <p><i>As requested, the scope of 7.2 has been expanded by removal of the limitation to areas of anticipated soil disturbance.</i></p> <p><i>(c) Documentation in a site plan has been added to be consistent with other HG FSP holders.</i></p> <p><i>(d) Additional clause added (7.4) to specified additional measure to monitoring for IP, in order to be consistent with other HG FSP holders. Addressed (IST).</i></p>
7.3	IP				<p><i>“may include” is not measurable; in (a) “season or time” is not specified or measurable; in (c) should include storage of logs or wood residue. Changed “may” to “will”. Changed (c) to include logs and wood residue. Changed (b) to specify timing of removal.</i></p> <p><i>Added (e) methodology for IP disposal. Addressed (IST).</i></p>
7.4	IP				<p><i>This doesn't talk at all about what species or whether they look at the Weed Seed Analysis. There is a recommended HG mix that is not considered. Should have someone qualified to look at the weed seed analysis before purchasing and using. Haida Gwaii seed mix has been added.</i></p> <p><i>Commitment to be in accordance with regulations is adequate. Addressed (IST).</i></p>
7.5	IP				<p><i>In (c) what happens if it fails after the second application? Wording modified to be consistent with other HG FSP holders. Additional treatment methods specified. Addressed (IST).</i></p>
Other	WTRA				<p><i>Not consistent with FPPR – no strategy for stand level biodiversity. LUOO takes precedent here as it stipulates that retention must be anchored to Cedar. Still doesn't exempt the plan holder from the requirement to provide a strategy for s.9.1 of the FPPR. FPPR s.9.1 WTRA clause added</i></p>



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					<i>to FSP as section 6.78. Addressed (IST).</i>
--	--	--	--	--	---

The following is a summary of additional changes made to the February 2019 submission that were not addressed in the previous FSP reviews.

FSP Section	FSP Heading	Date	From	ST Y/N	Change Made to FSP:
Appendix "E"	Overstory crop tree criteria				<i>This section has been removed because there are no multistory silviculture standards specified in the FSP. Addressed (IST).</i>
1.0	Clarifications/ definitions				<i>Definition of Qualified Professional added. HG seed mix included. Not sure what is meant by "HG seed mix included". Clarified in Supporting Doc.</i>
Table 1	Designations in Effect				<i>Recreation Trails and Sites updated to reflect the latest information from the District. Addressed (IST).</i>



Solutions Table Briefing Note
Haida Gwaii Natural Resource District
One Team, One Window, One Process,
Two Governments



Solutions Table Discussion:

Date: Dec 20 /2018

Present: Marlene Liddle, Mark Salzl, Sean Muise, Erika Stocker (observer).

Discussion: The Solutions Table reviewed the above table, with comments from the Integrated Stewardship Team (IST), BCTS responses, and secondary IST comments. More discussion will happen at next meeting.

Date: May 16 /2019

Present: Laadaa Richardson, Laurie Whitehead, Daryl Sherban, Risha Rushton

Discussion:

Solution Table agree to separate IST comments from Solution Table comments.

Date: 2019-05-29

Present: Laadaa Richardson, Laurie Whitehead, Daryl Sherban, Risha Rushton, ST Support Sharon Williams

Discussion:

Daryl added additional IST comments and licensee feedback to the above table regarding the February and March 2019 third and fourth submission including dates of comments received.

Laurie reviewed February version and drafted comments and will cross reference with the March version to see if the comments are still relevant.

Date: 2019-06-13

Present: Laadaa Richardson, Laurie Whitehead, Daryl Sherban, Risha Rushton, ST Support Sharon Williams, Remi Levesque and Dan Harris (Observers)

Discussion:

Laurie explained content added to the cultural value section above

Below outstanding concerns listed

s. 1 – Add bear den definition from LUOO – CHN concern is just having “active bear den” implication is that inactive bear dens not receiving required protection. Including the definition of “black bear dens” in the clarification section would make it very clear the distinction between definitions used in the results and strategies.



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- s. 6.1 – Cedar Stewardship Area – for consistency with LUOO language use CSA as acronym (not CS Area);
- s. 6.2(a) should reference Appendix 3: CHN's CSA Management Plan (supporting information)
- s. 6.13 – Cedar Management – CHN require that the annual limit on annual Cedar volume be 110% rather than 120%.
- s. 6.19-6.22 – Western yew – CHN require an addition to s.6.22: when Western yew is harvested it is to be provided to the Haida Gwaii Cultural Wood Access Program, and delivered to an agreed location
- s. 6.4 – Haida Traditional Heritage Features – FSP doesn't address all known sites; We recommend that BCTS not reference the CFI survey to identify known and potential heritage features – step (a) would be to engage CHN prior to any planning for development works annually about proposed development to be advised of old village sites and other known areas in the Haida data set to avoid (and save costs of engineering where it would result in impacts to values protected in LUOO)

Date: 2019-06-14

Present: Laadaa Richardson, Laurie Whitehead, Daryl Sherban, Risha Rushton, ST Support Sharon Williams, Dan Harris (Observer)

Discussion:

In 2017 CHN House of Assembly passed 2017-43 BCTS which provided direction to remove BCTS operating on and providing timber sales on Haida Gwaii.

Date: August 29, 2019

Present: Sean Brennan, Laurie Whitehead, Daryl Sherban, Ayla Pearson (admin), Sam Wesley(admin), Peter Barss (BCTS – Acting Woodland Supervisors/Planning Officer)

Discussion:

Peter Barss came to the Solutions Table to address these outstanding issues:

s. 1 – Add bear den definition from LUOO – CHN concern is just having "active bear den" implication is that inactive bear dens not receiving required protection. Including the definition of "black bear dens" in the clarification section would make it very clear the distinction between definitions used in the results and strategies.

- This has been added to the FSP

s. 6.1 – Cedar Stewardship Area – for consistency with LUOO language use CSA as acronym (not CS Area);



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- Modified the wording to be consistent with the LUOO, this has been done.
- s. 6.2(a) should reference Appendix 3: CHN's CSA Management Plan (supporting information)
 - This clarification has been added
- s. 6.13 – Cedar Management – CHN require that the annual limit on annual Cedar volume be 110% rather than 120%.
 - This is now section 6.15, BCTS plans to switch section b) and c). Add new wording to b around the undercut volume being carried forward and alignment with CHN expectations at 110%. This will be supplied in the new version of the FSP and given to ST to review.
- s. 6.19-6.22 – Western yew – CHN require an addition to s.6.22: when Western yew is harvested it is to be provided to the Haida Gwaii Cultural Wood Access Program, and delivered to an agreed location
 - BCTS is not proposing to specify that yew will be delivered to the Haida Gwaii Cultural Wood Access Program but will commit to notifying the program so it can be accessed. This practice is already present in the supporting document phrased as cut and deck will be changed to "or" decked.
- s. 6.4 – Haida Traditional Heritage Features – FSP doesn't address all known sites; We recommend that BCTS not reference the CFI survey to identify known and potential heritage features – step (a) would be to engage CHN prior to any planning for development works annually about proposed development to be advised of old village sites and other known areas in the Haida data set to avoid (and save costs of engineering where it would result in impacts to values protected in LUOO)
 - Clarified wording to align with Taan's FSP. Clarified wording at the planning stage regarding BCTS engaging the CHN. A pre-field assessment of known values is already a requirement in the CFI standards manual.

This section is not listed in the discussion above but present in the tables above:

s. 1.0 - Clarifications: Tree Length - "Tree Length" - Ambiguity gray area around what is adjacent; using the predominant site series for the cutblock to apply a Schedule 5 reserve on a stream does not meet intent and has been problematic in the past (i.e. should be the site series that the stream is within, not that of the adjacent harvest area) where does the LUOO say this? *Changed to say the dominant site series in the reserve and management zone for both. "Area or adjacent to the feature" as stated in the LUOO are not measurable so have said tree length will be based on dominant site series in the reserve and management zone. Does not consider the height of the feature. No further changes have been made. The BCTS definition of Tree Length is consistent with the working in the LUOO: the LUOO definition does not consider the height of the feature. The original comment requested BCTS clarify what is considered adjacent and this has been done, as described in the adjacent column. Still unresolved ambiguity around what is used as the accepted height – ie. if a super-canopy monumental is the feature and it is the tallest tree on site then it needs to be the default.*



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- BCTS is adding adjacency to the definitions which aligns with the Background and Intent document February 2019

S 6.49 – Annual Submissions - *Our (BCTS) practice has been to provide all required information to the Solutions Table for the review of our proposed developments... wording allows for the Solutions Table to set standards for submissions and to regularly update those standards without forcing a FSP amendment. If additional clarification is required, we propose, if necessary, modifying this section to read...*

The Timber Sales Manager will adhere to requirements of the Haida Gwaii Management Council and the Solutions Table for the development area referral process, the timber sale (cutting authority) review process, and for all related spatial database uploads.

- Added clarification wording around the submissions. Wording is slightly different from Taan's due to difference in application/process ie cutting permit vs timber sale licence.

S 7.1 – Invasive Plants - *S.7.1 The Timber Sales Manager will adhere to the current BCTS Chinook Invasive Plant BMP, which includes as Appendix D, the Haida Gwaii IPMA Plant List. Wording proposed change to "This BMP will be updated to include changes to the IPMA Plant Lists as they are made available. The BMP is included as Appendix 20 of the FSP Supporting Document."*

- Changed wording to annually update best management practice to use the most recent list of invasive plants.

Appx A – FDU Map

- BCTS FDU A covers all major tenure areas of Haida Gwaii to allow for access, silviculture, and potential development in other tenures.

Date: September 5, 2019

Present: Sean Brennan, Laurie Whitehead, Daryl Sherban, Ayla Pearson (admin), Sam Wesley(admin), Risha Rushton

Discussion:

s. 1 – Add bear den definition from LUOO – CHN concern is just having "active bear den" implication is that inactive bear dens not receiving required protection. Including the definition of "black bear dens" in the clarification section would make it very clear the distinction between definitions used in the results and strategies.

- Done.



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s. 6.1 – Cedar Stewardship Area – for consistency with LUOO language use CSA as acronym (not CS Area);

- Done.

s. 6.2(a) should reference Appendix 3: CHN's CSA Management Plan (supporting information)

- Done.

s. 6.13 – Cedar Management – CHN require that the annual limit on annual Cedar volume be 110% rather than 120%.

- Integrated into section 6.15.

s. 6.19-6.22 – Western yew – CHN require an addition to s.6.22: when Western yew is harvested it is to be provided to the Haida Gwaii Cultural Wood Access Program, and delivered to an agreed location.

- Consistent with other licensee FSP. BCTS didn't include this in their FSP. The FSP Supporting document already includes a detailed standard operating procedure for managing western yew, including a provision to notify the Cultural Wood Access Program when and where yew has been harvested so it will be available for cultural use.

s. 6.4 – Haida Traditional Heritage Features – FSP doesn't address all known sites; We recommend that BCTS not reference the CFI survey to identify known and potential heritage features – step (a) would be to engage CHN prior to any planning for development works annually about proposed development to be advised of old village sites and other known areas in the Haida data set to avoid (and save costs of engineering where it would result in impacts to values protected in LUOO).

- Wording integrated about canvassing CHN in advance. We understand this to mean CHN HNRD Mapping Department will be provided a spatial map illustrating where BCTS are planning to go so CHN can provide input on Haida Cultural Values.

Date: September 12th, 2019

Present: Sean Brennan, Laurie Whitehead, Daryl Sherban, Sam Wesley (admin)

Discussion:

On review of the FSP, ST found that BCTS integrated changes to accommodate CHN concerns. However, in 2017 CHN House of Assembly passed 2017-43 BCTS which provided direction to remove BCTS operating on and providing timber sales on Haida Gwaii.



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Action Items

#	Date	Action / updates	Complete
1	2019-05-16	Daryl to follow up with IST and direct them to create an IST table of engagement with BCTS that reflects changes to different versions of the FSP	Daryl updated STBN table with IST and licensee comments up to May 16, 2019
2	2019-05-16	Laurie send comments on outstanding items in the FSP to Solutions Table members.	June 13, 2019
3	2019-05-29	Laurie reviewed February version and drafted comments and will cross reference with the March version to see if the comments are still relevant.	June 13, 2019
4	2019-06-13	Request Owen Jones review the TSA map on pg. 39 of 57 and the comments in table 1 of the BCTS STBN <ul style="list-style-type: none">- BCTS FDU A covers all major tenure areas of Haida Gwaii to allow for access, silviculture, and potential development in other tenures.	August 29/19
5	2019-06-13	Daryl Sherban to forward updated discussion and outstanding concerns in STBN to BCTS	August 21, 2019



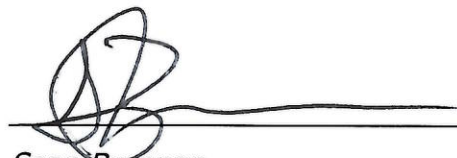
Solutions Table Briefing Note
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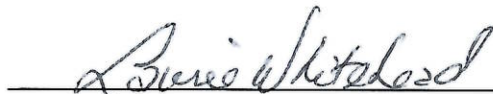
Comments to Decision Makers:

The Solutions Table submits the above information to the Decision Makers for their consideration. The proponent must ensure that all required authorizations are in place before commencing the project.

Note to all decision makers: in 2017 CHN House of Assembly passed 2017-43 BCTS which provided direction to remove BCTS operating on and providing timber sales on Haida Gwaii.


Sean Brennan

Sept 12, 2019


Laurie Whitehead

September 12, 2019


Daryl Sherban

Sept 12, 2019

Appendix 4

First Nation and Stakeholder Communication Summary

Stakeholder Contacts - Haida

Group	Contact	Address	Email	July 31st, 2017	August 30th, 2017
Council of the Haida Nation - Skidegate		#1 Reservoir Road HIGaagilda (Skidegate), BC, V0T 1S1	chn.skidegate@haidanation.com	notified via email	second notice sent via email
Council of the Haida Nation - Old Massett		504 Naanii Street Gaaw (Old Massett), BC, V0T 1M0	chn.hts@haidanation.com	notified via email	second notice sent via email
Skidegate Band Council	Billy Yovanovich, Chief Coucillor	PO Box 1301 Skidegate, BC V0T 1S1	haida@skidegate.ca	notified via email	second notice sent via email
Old Massett Village Council	Ken Rea, Chief Councillor	348 Eagle Avenue PO Box 189 Old Masset, BC, V0T 1M0	omvcrec@mhtv.ca	notified via email	second notice sent via email

Municipalities

Address	Phone	Fax	Email	July 31st, 2017	August 30th, 2017
903A Oceanview Drive PO Box 580 Queen Charlotte, BC V0T 1S0	250-559-4765	250-559-4742	office@queencharlotte.ca	notified via email	second notice sent via email
36 Cedar Avenue West PO Box 198 Port Clements, BC V0T 1R0	250-557-4295	250-557-4568	deputy@portclements.ca	notified via email	second notice sent via email
1686 Main Street PO Box 68 Masset, BC V0T 1M0	250-626-3995	250-626-3968	vom@mhtv.ca	notified via email	second notice sent via email
113 Oceanview Drive PO Box 652 Queen Charlotte, BC V0T 1S0	250-624-2002	250-627-8493	sandspitbill@live.ca	notified via email	second notice sent via email
113 Oceanview Drive PO Box 652 Queen Charlotte, BC, V0T 1S0	250-624-2002	250-627-8493	mikeracz3@gmail.com	notified via email	second notice sent via email

Stakeholder Contacts - Industry

Type	Group	Contact	Email	July 31st, 2017	August 30th, 2017
BCTS Licensee	Infinity West Enterprises Inc	Dave Froese	dave@infinitywest.ca		
BCTS Licensee	O'Brien & Fuerst Logging Ltd	Randy O'Brien	randy@obrienlogging.com		
BCTS Licensee	ABFAM Enterprises Ltd	Jim Abbott	abfam@gcislands.net		
BCTS Licensee	Delta Cedar	Doug Abbott	dabbott@deltacedar.com		
BCTS Licensee	Gamble Lowbedding	Cameron Gamble	gamblelowbedding@live.com		
Consultant	Infinity-Pacific Stewardship Group	Mike Petrie	mpetrie@infinity-pacific.com		
Consultant	Chartwell Consultants Ltd	Cliff Roberts	croberts@chartwell-consultants.com		
Private Land	Island Timberlands LP	Bill Waugh, Director Planning & Forestry	billwaugh@islandtimberlands.com		Email
Tenure Holder	Taan Forest Products	Jeff Mosher, Planning Forester	jeff@taanforest.com		Email
Tenure Holder	A&A Trading	Dave Marquis, Planning and Certification Forester	dmarquis@aatrading.com		Email
Tenure Holder	Husby Forest Products	Jonathan Fane, VP of Forestry	jonfane@tecfor.bc.ca		Email
Tenure Holder	WL162	Gerald Lavoie			Called and left voice mail
Tenure Holder	WL161	Dave Younger	dyounger@telus.net		
Tenure Holder	WL1840 - Skidegate Band Council	Billy Yovanovich, Chief Councillor	haida@skidegate.ca	notified via letter for SBC	
Tenure Holder	WL1841 - Old Massett Village Council	John Disney, Manager	ecdev@mhtv.ca	notified via letter for OMVC	

Stakeholder Contacts - Government

Group	Contact	Address	Email	July 31st, 2017	August 30th, 2017
BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development	Leonard Munt, District Manager	1229 Oceanview Drive PO Box 39 Queen Charlotte, BC, V0T 1S0	leonard.munt@gov.bc.ca	notified via email	
Fisheries and Oceans Canada	Patrick Fairweather, Community Advisor	PO BOX 208, Queen Charlotte, BC, V0T 1S0	patrick.fairweather@dfo-mpo.gc.ca		notified via email
Parks Canada, Gwaii Haanas National Park Reserve, National Marine Conservation Area Reserve, and Haida Heritage Site	Ernie Gladstone, Field Unit Superintendent	PO BOX 37, Queen Charlotte, BC, V0T 1S0	gwaii.haanas@pc.gc.ca		notified via email
BC Parks, Ministry of Environment	Lucy Stefanyk, Area Supervisor	PO BOX 19, Tlell, BC, V0T 1Y0	lucy.stefanyk@gov.bc.ca		notified via email

Stakeholder Contacts - ENGOS

Group	Contact	Address	Email	July 31st, 2017	August 30th, 2017
Gowgaia Institute - Spruceroots	Leslie Johnson, Executive Director	PO BOX 638, Queen Charlotte, BC, V0T 1S0	ljohnson@spruceroots.org		notified via email
Laskeek Bay Conservation Society	Lindsay Seegmiller, Executive Director	PO BOX 867, Queen Charlotte, BC, V0T 1S0	laskeek@laskeekbay.org		notified via email
Mount Moresby Adventure Camp Society	Toby Sanmiya, Executive Director	PO BOX 670, Queen Charlotte, BC, V0T 1S0	mountmoresbyadventurecamp@gmail.com		notified via email
Delkatla Sanctuary Society	Margo Hearne, Director	PO BOX 246, Massett, BC, V0T 1M0	hecatebird@gmail.com		notified via email
QCI Salmon Unlimited Society	Barry Mark	PO BOX 683, Massett, BC, V0T 1M0	tmarkqci@gmail.com		notified via fax
Hecate Strait Streamkeepers Society	Ralph Nelson	PO BOX 975, Queen Charlotte, V0T 1S0	hssk@qcislands.net		notified via email
Cloudberry Action Network	Gerry Morigeau		cloudberryactionnetwork@gmail.com		notified via email

Stakeholder Contacts - Resource Based Tenure Operators

Type	Group	Contact	Address	Email	July 31st, 2017	August 30th, 2017
Fishing Lodge	Langara Fishing Adventures	Rick Bourne	201-440 Cowley Crescent, Richmond, BC, V7B 1B8	info@langara.com		notified via email
Fishing Lodge	Naden Lodge		PO BOX 648, Massett, BC, V0T 1M0	nadenlodge@mhtv.ca		
Fishing Lodge	Queen Charlotte Adventures		9398 Alaska Way, Delta, BC, V4C 4R8	info@charlottequeenadventures.com		
Fishing Lodge	Queen Charlotte Lodge		180-3600 Lysander Lane, Richmond, BC, V7B 1C3	info@queencharlottelodge.com		
Tour Operator	Haida Style Expeditions	James and Shawn Cowpar, Owners	PO BOX 1771, Skidegate, BC, V0T 1S1	haidastyle@gmail.com		
Tour Operator	Moresby Explorers Ltd.	Heron Wier, Laura Pattison, Owners	PO BOX 127, Sandspit, BC, V0T 1T0	info@moresbyexplores.com		notified via email
Tour Operator	Green Coast Kayaking	Bryce Klee	3302 Oceanview Drive, Queen Charlotte, BC, V0T 1S0	info@gckayaking.com		
Resort	Maude Island Retreat	Geoff Martinyuk		geoffreymartynuik@gmail.com		

Stakeholder Contacts - Other

Group	Contact	Address	Email	July 31st, 2017	August 30th, 2017
Misty Isles Economic Development Society	Janine North, Executive Director	113 Oceanview Drive PO 652 Queen Charlotte, BC, V0T 1S0	janine@gohaidagwaii.ca	notified via email	second notice sent via email
Gwaii Trust Society	Carla Lutner, Chief Operating Officer	226 Front Street PO Box 1257 Skidegate, BC V0T 1S1	carla.lutner@gwaiitrust.com		notified via email
Haida Gwaii Community Futures	Michael Racz, General Manager	P.O. Box 40 Masset, BC V0T 1M1	office@haidagwaiifutures.ca		notified via email

Communication Log

Date	Contact	Stakeholder Group	Comments
August 31, 2017	Jeff Mosher	Industry	Jeff submitted a comment via email (saved in Stakeholder Letters / 03-Responses). His comment was pertaining to section 66 of FPPR (WTRA requirements) and our section 6.105 of the draft FSP stating we do not require WTRAs because of Forest Reservers established under the HGLUOO.
September 6, 2017	Eliot King	Industry	Eliot submit minor grammatical and spelling errors (saved in Stakeholder Letters / 03-Responses)
September 12, 2019	Daryl Sherban	Integrated Solutions Table	First submitted to IST for review on July 31, 2017. Subsequent FSP updates and IST comments until final review and sign-off by IST on Sept 12, 2019. See attached IST report.

Appendix 5

Review and comment by the Haida Gwaii Natural Resource District

From: [Muisse, Sean FLNR:EX](#)
To: [Ryland, Alexandra FLNR:EX](#)
Cc: [Sherban, Daryl FLNR:EX](#); [Ruskin, Jessica FLNR:EX](#)
Subject: Review of Draft BCTS FSP
Date: October 31, 2017 4:25:38 PM
Attachments: [BCTS 2017 FSP Stewardship Review Oct 27 17.pdf](#)

Hi Alex,

The FLNRO Stewardship Team has fully reviewed the FSP submitted in July 2017 by BCTS Chinook Business Area for the Haida Gwaii Natural Resource District. The review team focused critical elements that were consistent with Expectations Letter that was sent to all licensees on June 14th, 2016 and information relative to the All-Licensee FSP extension determination last fall. Specifically we looked at how new information was incorporated, the measurability/verifiability of results/strategies/measures, the level of public engagement demonstrated and implementation gaps that were noted during the course of the last 6 years. Our collective comments and questions can be found under three categories in the attached spreadsheet:

1. *Clarification Needed*
2. *More Information or Rationale Needed*
3. *May Not Meet Legal Tests for Determination*

Have a look and let me know if you see anything that doesn't make sense - Thanks and we'll talk to you soon!

Sean Muise, RPF
Stewardship Officer
Haida Gwaii Natural Resource District
250.559.6204

Appendix 6

Additional Public Engagement

HAIDA GWAII FORESTRY

INFORMATION SESSIONS HAVE BEEN POSTPONED

Haida Gwaii Community,

Major forest licensees, in concert with the Haida Nation and the Province, are hosting community forums in Haida Gwaii to discuss forest planning and practices. Bring your questions, ideas, and/or concerns, or just listen in! Each session will include presentations by forest planners about their operations and an open mic opportunity for questions and answers. The Province and the Haida Nation will be present to answer questions concerning formal oversight over forestry activities, including the Land Use Objectives Order, the Timber Supply Review, monitoring, and decision making. Coffee and snacks will be provided.



**Taan
FOREST**



BCTS
BC Timber Sales



**A&A
TRADING LTD**



MASSET

APRIL 3, 2017
Masset
Community Hall
6-9 pm

PORT CLEMENTS

APRIL 4, 2017
Port Clements
Community Hall
6-9 pm

QCC / SKIDEGATE

APRIL 5, 2017
Haida Heritage
Centre
Performance House
6-9 pm

SANDSPIT

APRIL 6, 2017
Sandspit
Community
Hall
6-9 pm

Please feel free to submit any questions or discussion topics for these sessions in advance to haidagwaiiforestryinfo@gmail.com (before March 31, 2017).



BC Timber Sales Follow-up to the Haida Gwaii Forestry Information Sessions 2017

In April 2017, the Haida Gwaii major forest licensees and BC Timber Sales (BCTS), in concert with the Council of the Haida Nation (CHN) and the Province, hosted forestry information sessions in the communities of Masset, Port Clements, Skidegate and Sandspit. The sessions provided an opportunity for dialogue between forestry organizations and the public. Community members were generous with their time and input, and the sessions were well attended, averaging over 50 attendees per session. Thank you to the communities for their participation, and to the CHN and the Province for their involvement.

During the sessions, common questions, comments and ideas were expressed by the communities. The discussion included, but was not limited to, the following topics:

- Community Engagement
- Sustainable Forest Management
- Community Forest Agreement
- Cedar Management
- Ecological Impacts of Forestry Activities
- Cultural Impacts of Forestry Activities
- Local Employment
- Manufacturing
- Economic Benefits and Forestry Revenue
- Wood Waste
- Silviculture

These topics have been organized into the following matrix filled out by BCTS. The matrix identifies: whether or not the topic is within BCTS' scope to address, the strategy to address the topic and the timeline for the strategy to be achieved by. This matrix provides transparent and measureable documentation of BCTS' commitment to incorporate public feedback into their planning and operations.

Once again, thank you to the communities for participating in discussions concerning sustainable forest management on Haida Gwaii. We look forward to future opportunities to engage with community members.

The matrix is a living document, and will be occasionally updated (last updated January 5, 2018). It is posted on the BCTS Haida Gwaii 2017-2018 Development Plan website:

<https://www.for.gov.bc.ca/ftp/TCH/external/!publish/FSP/HG/2017-2018-Development-Plan/>

Questions or comments to BC Timber Sales – Haida Gwaii: bcts.haidagwaii@gov.bc.ca

British Columbia Timber Sales - Haida Gwaii Field Team
2017 Haida Gwaii Forestry Information Sessions
Strategies for incorporating public input into planning and operations

Topic	BCTS scope	Opportunity or strategy to incorporate public feedback into planning and operations	Timeline	Complete Yes/No
Community Engagement				
a. Maintain ongoing, two-way dialogue between licensees and communities	Yes	Hold public meetings in Haida Gwaii communities to discuss BCTS Haida Gwaii operations and development plans.	Annually	Ongoing
		Solicit input from the communities at public meetings.	Ongoing	Ongoing
b. Proactive information sharing from licensees	Yes	Make development plan maps available on BCTS website: https://www.for.gov.bc.ca/bcts/areas/TCH/FSP_HG.htm	Ongoing	Ongoing
		Run advertisements in the Haida Gwaii Observer for upcoming development packages with embedded links to website (every six months).	January 2018	No
		Provide Band and Village offices with paper development plan maps that will include webpage link to BCTS FSP and InfoSharing packages, and road building and deactivation plans.	January 2018	No
		Publish a list of Timber Sales Licences (TSLs) to the BCTS website, so the public is aware of BCTS TSL closures. https://www.for.gov.bc.ca/bcts/areas/TCH/FSP_HG.htm	Annually	No
c. Increase frequency of opportunities for community to receive information and provide feedback	Yes	Hold public meetings in Haida Gwaii communities to discuss BCTS Haida Gwaii operations and development plans.	Annually	Ongoing
		Continue to participate in all-licensee meetings.	Annually	Yes
		Increase local awareness of on-island BCTS staff to facilitate ongoing discussion between BCTS and the residents of Haida Gwaii.	Ongoing	Ongoing
d. Review 2015 Community Forestry Strategy Forum summary	Somewhat	Review 2015 HGMC Community Forestry Forum notes and incorporate information within BCTS' scope into into this matrix.	July 2017	Yes
e. Publish summaries of public meetings	Yes	Publish summaries of public meetings on the BCTS Chinook website: https://www.for.gov.bc.ca/bcts/areas/TCH/FSP_HG.htm	Ongoing	Ongoing
Cedar Management				
a. Quantify how much cedar remains in the timber harvesting land base on Haida Gwaii	No	Out of BCTS' scope.	--	--
b. Establish a hard partition for western redcedar and yellow-cedar harvest	No	Out of BCTS' scope.	--	--
c. Pursue and consider selective harvesting options for cedar-dominant stands	Somewhat	BCTS to assess historic practices and formulate options, with the intent of developing a best management practice.	2018	No
d. Quantify the severity and dispersion of yellow-cedar decline on Haida Gwaii	Somewhat	Liaise with researchers and forest professionals to seek out information on yellow-cedar decline on Haida Gwaii.	June 2017	Yes
		Increase yellow-cedar planting in line with pre-harvest composition.	2018	No
e. Develop a management plan to conserve yellow-cedar for cultural and ecological purposes	Somewhat	Manage BCTS operations in accordance with the Haida Gwaii Land Use Objectives Order (HGLUOO).	Ongoing	Ongoing
		BCTS is currently developing a yellow-cedar management strategy which involves data collection, regeneration, reviewing literature and liaising with forest health specialists and researchers.	December 2017	Yes

Topic	BCTS scope	Opportunity or strategy to incorporate public feedback into planning and operations	Timeline	Complete Yes/No
Sustainable Forest Management				
a. Manage the forest to ensure future generations can experience the economic, cultural and ecological benefits of the forest	Yes	Manage BCTS operations in accordance with the HGLUOO, Heritage Conservation Act, Forest Act, Fisheries Act, Forest Planning and Practices Regulation (FPPR), Sustainable Forest Initiative certification, and all other relevant legislation.	Ongoing	Ongoing
		BCTS has implemented the Forest Professional Oversight Certification pilot, where Registered Professional Foresters are required to ensure TSL license holder operations adhere to the FSP.	January 2018	Yes
b. Establish sustainable harvest rate	Somewhat	BCTS manages TSL volumes in accordance with established AAC.	--	--
c. Incorporate climate change strategies into management plans	Yes	Incorporate BCTS's Climate Change Strategy into BCTS's strategic plan and include climate change-specific commitments into the draft 2017 Forest Stewardship Plan.	Ongoing	Ongoing
d. Manage remaining old growth	Yes	BCTS has developed the Coastal Tree Legacy Best Management Plan.	2018	Yes
		Manage BCTS operations in accordance with the HGLUOO.	Ongoing	Ongoing
Cultural Impact of Forestry Activities				
a. Preserve Haida forest values	Yes	Manage BCTS operations in accordance with the HGLUOO, Heritage Conservation Act, Fisheries Act, FPPR, and all other relevant legislation.	Ongoing	Ongoing
b. Maximize benefits of logging experienced by the Haida Nation and its Members	No	Out of BCTS' scope.	--	--
c. Maintain meaningful, continual consultation with the Haida Nation and its members	Yes	Continue to have all BCTS developments reviewed by representatives of the Haida Nation and the Province of BC at the Solutions Table.	Ongoing	Ongoing
		See all strategies listed under the community engagement topic.	Ongoing	Ongoing
Ecological Impact of Forestry Activities				
a. Protect fish habitat from forestry activities	Yes	Manage BCTS operations in accordance with the HGLUOO, Heritage Conservation Act, Fisheries Act, FPPR, Sustainable Forest Initiative certification, and all other relevant legislation.	Ongoing	Ongoing
		Contract biologists to develop habitat related management strategies on a site-specific basis.	Ongoing	Ongoing
b. Increase awareness of the impact of logging on wetland habitats	Somewhat	Contracted a Hydrologist to analyse and provide a report on the relationship between wetlands and logging in the Naikoon Landscape Unit.	July 2017	Yes
		Contract biologists to develop habitat related management strategies on a site-specific basis.	Ongoing	Ongoing
c. Manage impacts of forestry operations on wildlife and habitat integrity	Somewhat	Contract hydrologist to analyse and provide a report on the relationship between wetlands and logging in the Naikoon Landscape Unit.	July 2017	Yes
		Contract biologists to develop habitat related management strategies on a site-specific basis.	Ongoing	Ongoing
d. Minimize pollution related to forestry activities	Yes	Licensees and contractors must comply with BCTS's Environmental Management System (i.e. Environmental Field Procedures for roads, bridges and culverts, harvesting, and fuel handling), which includes testing and drills.	Ongoing	Ongoing
Community Forest Agreement				
a. Community control of the vision and management for the community forest	Yes	BCTS is currently participating in discussions with Misty Isles Economic Development Society (MIEDS), the Council of the Haida Nation (CHN) and the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD).	Ongoing	Ongoing
b. Commitment to local employment and access to fibre for local manufacture	Yes	BCTS is participating in discussions with MIEDS, the CHN and FLNRORD.	Ongoing	Ongoing

c. Maximize revenue to Haida Gwaii communities	Yes	BCTS is participating in discussions with MIEDS, the CHN and FLNRORD.	Ongoing	Ongoing
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Topic	BCTS scope	Opportunity or strategy to incorporate public feedback into planning and operations	Timeline	Complete Yes/No
Economic Benefits and Forestry Revenue				
a. Maximize retention and even distribution of forestry revenue throughout Haida Gwaii	No	Out of BCTS' scope	--	--
b. Increase opportunity for small operators and manufacturers	Potential	Continue to manage the BCTS Sales Schedule to provide an opportunity for small operators and manufacturers, which balances sales with needs of BCTS registrants. https://www.for.gov.bc.ca/BCTS/registration/	Ongoing	Ongoing
Local Employment				
a. Prioritize hiring local, before sourcing off-island workers	Somewhat	BCTS publishes contract opportunities on the BCTS website: https://www.for.gov.bc.ca/bcts/contracts/	Ongoing	Ongoing
b. Increase local capacity through training and apprenticeship opportunities	Potential	BCTS is a partner in The First Nations Training Program managed by the BC First Nations Forestry Council. BCTS provides summer jobs and mentoring for students under this program. BCTS has 10 positions for participants of this program annually.	Ongoing	Ongoing
c. Improve the distribution of work opportunities amongst the communities	No	Out of BCTS' scope	--	--
Manufacturing				
a. Improve local capacity to manufacture on-island	No	Out of BCTS' scope	--	--
b. Increase access to timber, salvage and wood waste for local mills and wood workers	Somewhat	Add language to TSLs which requires the TSL holder to notify the CHN that harvesting will commence in 14 days.	February 2018	No
		Publish a list of TSLs to the BCTS Chinook website annually, so the public is aware of BCTS TSL closures. https://www.for.gov.bc.ca/bcts/areas/TCH/FSP_HG.htm	January 2018	Yes
Wood Waste and Residue				
a. Increase utilization of harvested timber	Somewhat	Quantify/monitor wood waste through a waste and residue survey contract, to develop an understanding of how much wood waste is actually being left.	February 2018	No
b. Improve access to salvaged wood fibre for local mills and individuals	Somewhat	Post a list of completed TSLs to the BCTS Chinook website annually, so the public and FLNRORD is aware of BCTS TSL closures. https://www.for.gov.bc.ca/bcts/areas/TCH/FSP_HG.htm	January 2018	Yes
		Add TSL clause that requires licensee to yard all timber above a certain diameter roadside, except for material required to be dispersed. Coarse woody debris requirements will be as per FRPA.	October 2017	Yes
c. Don't burn wood waste	Potential	Management of waste and residue is the responsibility of the TSL holder. Fire hazards and wood waste must be assessed and abated as per the BC Wildfire Act and Regulations.	Ongoing	Ongoing
		BCTS will assess TSL language for opportunity.	Fall 2017	No
Silviculture				
a. Employ locally, before sourcing off-island workers	Somewhat	Develop a contract strategy based on local resources, access to specialists and SAFE Certified local entities.	February 2018	No
b. Increase investment in silviculture activities	Potential	Currently, BCTS meets its silviculture obligations. There are currently no plans to increase investment in silviculture activities.	--	--
c. Generate silviculture jobs through incremental silviculture	Potential	Currently, there are no plans to prescribe incremental silviculture activities.	--	--
d. Research, conduct trials and utilize various silviculture/ harvesting systems	No	FLNRORD Forest Improvement and Research Management Branch - out of BCTS' scope	Spring 2018	No



Public meeting summary

BC Timber Sales (BCTS) Operations and Planning on Haida Gwaii

Gaaw/Old Massett (Sept. 19, 2017, 7:15-9:15pm)
Masset (Sept. 20, 2017, 6:00-8:00pm)

In September 2017, British Columbia Timber Sales (BCTS) hosted public meetings in Gaaw/Old Massett and Masset, to discuss BCTS operations and development plans on Haida Gwaii. BCTS staff introduced the BCTS organization and presented a 4-year summary of Haida Gwaii operations as well as BCTS's development plans for 2017 and 2018. Each meeting focused on an open discussion where community members provided comments and asked questions. The meetings were well attended with at least 40 participants per evening. BCTS would like to express gratitude for the time community members took to come to the meetings and for sharing their thoughts and questions. Highlights of the presentation and discussion are summarized below.

Introduction to the BCTS Organization:

- BCTS is an autonomous division of the Ministry of Forests, Lands and Natural Resource Operations and Rural Development (FLNRORD).
- The primary function of BCTS is to provide credible data for the province, to support the Market Pricing System (MPS).
 - Data on timber value is gathered from auctioning Timber Sale Licences
 - Data on the cost of doing business (i.e. planting, road building, etc.), is gathered from competitively tendering contracts
 - This Haida Gwaii-specific data is fed into the coastal stumpage system, which in turn generates stumpage rates that considers Haida Gwaii's timber values and operational costs
- BCTS and trade:
 - MPS demonstrates BC's lumber is not subsidized by the Government
 - MPS supports the Softwood Lumber Agreement between Canada and the United States
 - 67% of BC's global timber exports in 2016 were sold to the United States, for a value of \$4.6 billion

BCTS on Haida Gwaii:

- BCTS operates under the shared decision-making framework, agreed upon by the Council of the Haida Nation (CHN) and the Province
- BCTS available harvest volume is set by the Chief Forester, as per the Haida Gwaii Management Council's (HGMC) recommendation and is approximately 176,000 m³/year
- HGMC is comprised of Haida and Provincial Representatives, which are responsible for many forest management-related decisions and frameworks specific to Haida Gwaii
- The HGMC is also responsible for the Haida Gwaii Land Use Objectives Order (HGLUO) and amendments
- BCTS operates within Timber Supply Area (TSA) 25
- BCTS operations are certified by the Sustainable Forestry Initiative (SFI)



- Timber Sale Licence (TSL) structure and mechanics:
 - BCTS auctions rights to harvest timber under a TSL
 - Bidders must be registered in the BCTS program
 - BCTS also auctions TSLs as Category-2 (bidders must have access to secondary processing facilities in BC)

BCTS processes under the legislation:

- BCTS conducts Landscape-level planning which involves running annual analyses to monitor and report on HGLUO targets including, but not limited to:
 - Ecological representation, wildlife habitat, hydrological recovery, Cedar Stewardship Areas, etc...
- BCTS contracts, Forest Professionals, Biologists, Cultural Feature Identification surveyors, Geotechnicians and Hydrologists to conduct site-specific assessments, to identify and manage considerations such as:
 - Haida Traditional Heritage and Forest Features, terrain and hydrology considerations, block and road layout, bird's nests and bear dens, timber values, visuals, etc...
- All BCTS developments are reviewed by Solutions Table representatives from the CHN and the Province
- BCTS packages blocks into TSLs, which are auctioned and awarded to the highest bidder
- BCTS monitors the licence holder's conformance with the TSL specifications
- BCTS manages the silviculture liabilities so that blocks achieve regeneration milestones (i.e. planting, surveys and treatments)

BCTS is held accountable by the following organizations:

- Haida Gwaii Solutions Table (CHN & the Province)
- Compliance and Enforcement (FLNRORD)
- Forest and Range Evaluation Program (FLNRORD)
- CHN Effectiveness Monitoring
- Sustainable Forestry Initiative auditing
- Forest Practices Board

Future considerations that may impact BCTS Haida Gwaii operations:

- Timber Supply Review (2018)
- BCTS draft Forest Stewardship Plan (2018)
- Haida Gwaii Community Forest Agreement
- Market conditions and trade agreements
- Direction from recently elected provincial government

BCTS Haida Gwaii Operations (2013-2016) and Plans (2017-2018)

BCTS establishes a Sales Schedule, that details when the annual available volume will be sold throughout the year. As per the 2012 AAC determination, BCTS' available volume is 176,000 m³, or 19% of the total Haida Gwaii AAC.

Figure 1: BCTS Haida Gwaii Operations Summary (2013-2016) and Plans (2017-2018)

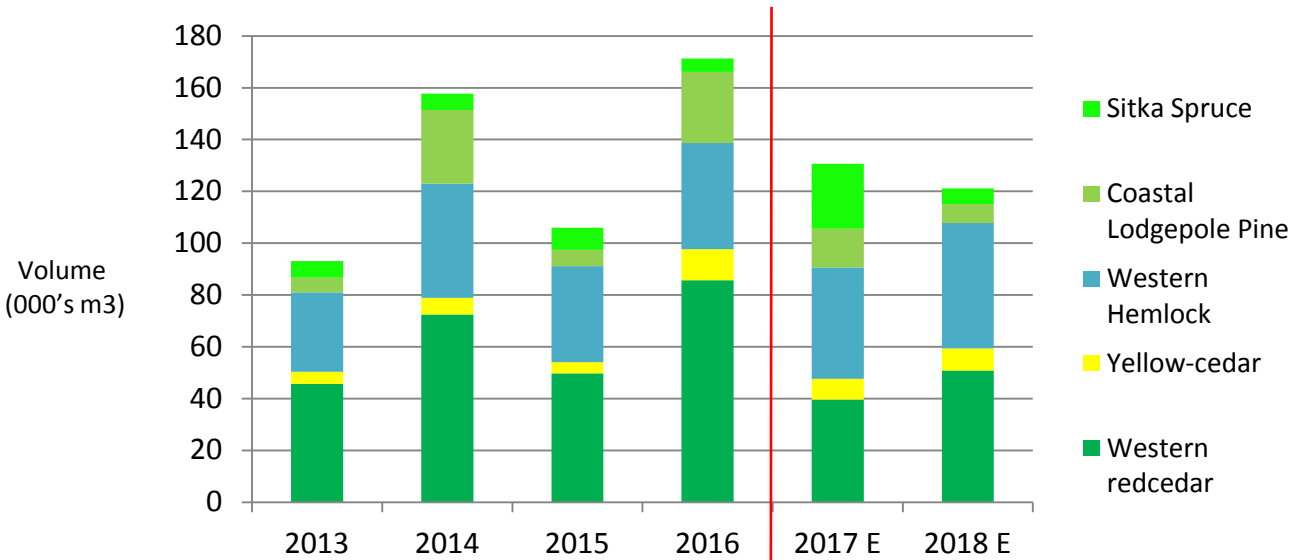


Figure 1 summarizes the annual volumes and species composition of BCTS sales from 2013-2016 and the planned volumes and species compositions to be sold in 2017 and 2018. E = projected sales.

Figure 2: BCTS Haida Gwaii Operations - % of available cedar sold per year (2013-2016)

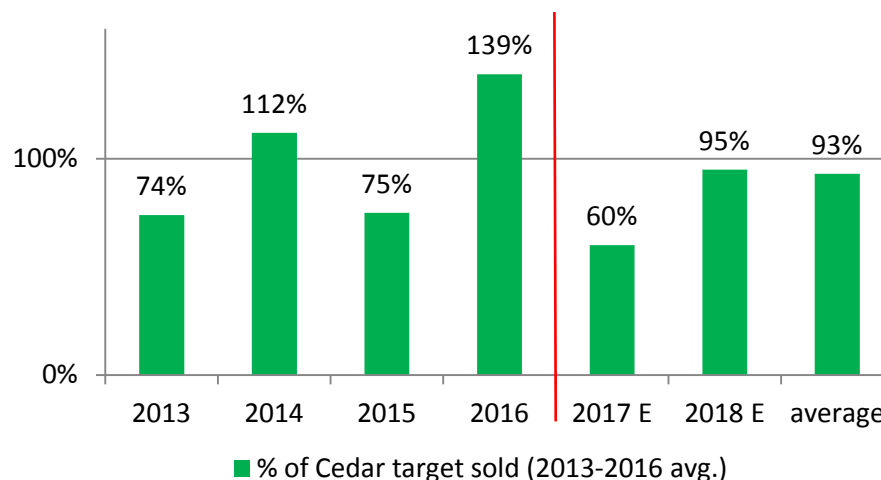


Figure 2 demonstrates that BCTS manages the sale of cedar on target with the Chief Forester's 2012 soft partition. BCTS's available cedar harvest as per this soft partition is 66,981 m³ (depicted as the 100% horizontal line). E = projected sales.



Discussion:

BC Timber Sales Organization

Q: *How many years has BCTS been operating on Haida Gwaii?*

A: Since BCTS' inception in 2003.

Q: *Who gets the revenue from the sale of a Timber Sale Licence?*

A: The Province receives revenue from the sale of the Timber Sale Licence. The revenue not only covers the planning and silviculture costs associated with the sale, but is pooled provincially and is allocated to programs and services by the Provincial government, including transportation/highways, healthcare, education, tourism, infrastructure, etc.

Sustainable Forest Management

Q: *Who determines the Objectives of the Haida Gwaii Land Use Order?*

A: Establishment, implementation and amendment of the Land Use Objectives is the responsibility of the Haida Gwaii Management Council. From the HGMC website: The HGMC forms part of the decision making framework outlined in the Kunst'aa guu Kunst'aayah Reconciliation Protocol. It was convened in 2011 by the Haida Nation and the Province of BC to create a more productive relationship through a joint decision making process, (resulting in a more respectful approach to land and natural resource management on Haida Gwaii). The HGMC has the authority to make determinations related to a specific set of strategic land and resource decisions.

Q: *Why isn't BCTS harvesting their entire annual available volume?*

A: BCTS' goal is to harvest its entire apportionment. There are operational constraints which make delivery of this commitment challenging. BCTS has committed to manage its allocation of cedar harvest in accordance with the Chief Forester's recommendation in the 2012 AAC determination. BCTS has been at or near 100% of this allocation, to ensure this cedar harvest limit is not exceeded, BCTS has sold approximately 75% of their volume allocation since the 2012 determination.

Q: *How can you justify the rate of harvest in the Naikoon Landscape Unit? How can BCTS' plans in the Naikoon Landscape Unit be considered sustainable?*

A: BCTS is managing Timber Sales volumes in accordance with the HGMC AAC determination and Chief Forester AAC establishment. This is supported by a Timber Supply Review, which is currently being updated to incorporate updated forest inventory data. This updated TSR is scheduled to be completed in 2018. Within the Timber Supply Area, there are limitations within Landscape Units and watershed subunits that limit the amount of harvesting within operating areas. There are also biodiversity and wildlife objectives within the Land Use Order which establish harvestable area within Landscape Units, such as Naikoon.

Q: *Regarding Timber Supply Analyses, what is considered “long-term”?*

A: From the 2012 Haida Gwaii Timber Supply Review Analysis Report: As part of the analysis, harvest forecasts showed the available timber supply over 400 years to ensure that allowable harvest levels over the short and medium term are consistent with long-term sustainability, as well as the management requirements of the SLUA and LUOO.

Q: *Why is it that in some years, BCTS sold more than the Chief Forester’s soft partition for cedar?*

A: BCTS is committed to sell cedar in accordance with the Chief Forester’s soft partition. The cedar level was set by the Chief Forester, based on an average yearly volume. It is not based on every year individually. In some years, BCTS exceeds the soft partition and in other years it is well below. On average, BCTS has sold below the soft partition volume (2013 - 2017). Blocks and operating areas have very different species compositions; therefore managing consistent species-specific harvest levels on a yearly basis is not operationally feasible.

Q: *What is the breakdown of the species composition for the Timber Supply Area 25?*

A: The Timber Supply Review 2012 identified the following species composition for the entire Haida Gwaii Timber Harvesting Landbase (THLB) as approximately: 45% Hemlock, 27% Red cedar, 17% Spruce, 6% Yellowcedar, 4% Pine and <1% Deciduous.

Q: *Why are there more corridors on the highway between Port Clements and Masset? Who is doing this?*

A: The areas adjacent to the Highway between Port Clements and Masset are a combination of Timber Harvesting Landbase (THLB) and private lots accessed by different parties. BCTS prioritizes existing access as the first option. Some areas require new access to be established as not all areas are feasibly accessible by the existing roads.

Who is doing this? This depends on the location of the access. Access corridors have been established by BCTS, other Licensees, industrial users, Woodlot owners and private land owners.

Q: *Can there be limits placed on how much each ecosystem can be harvested in an area?*

A: Yes, there are biodiversity objectives of the HGLUO regarding ecological representation. In each Landscape Unit, there are established targets that are required to be retained for old forest as well as red and blue listed (rare) ecological communities. Please see Schedule 10 of the HGLUO for details.

Benefits of BCTS operations on Haida Gwaii

Q: *How much money has been made by BCTS on Haida Gwaii?*

A: Revenue totals for BCTS are reported Provincially. BCTS provincial revenue is roughly \$40 million dollars annually.

Q: *How does BCTS serve the community of Haida Gwaii?*

A: BCTS provides opportunity for bidders registered with BCTS to access timber. A vast majority of our TSLs have been awarded to on-island registered bidders, whose workforce is almost entirely local. These licensees and employees spend their wages and contribute taxes to their communities, which in turn induce employment and economic opportunities in non-resource related industries. Like taxes, revenue generated by BCTS contributes to general revenue that provides social infrastructure to the Province. BCTS has sold partnership volume with Misty Islands Economic Development Society (MIEDS) which has generated approximately \$600 thousand for MIEDS.



BCTS collects data that sets stumpage rates for licensees, so that licensees such as Taan Forest pay stumpage at a rate that considers the operational costs of Haida Gwaii (comparatively higher than on the south coast). This market data supports the Market Pricing System, which satisfies the Softwood Lumber Agreement and facilitates the export of BC lumber to the United States. Trade with the US accounts for 67% of BC's lumber trade, and equates to \$4.6 billion annually (2016).

Q: *How does the Haida Nation benefit from BCTS operations on Haida Gwaii? Is there a possibility for revenue sharing between BCTS and the Haida Nation?*

A: There are existing revenue agreements signed by the Haida Nation and the Province. This includes the Kunst'aa Guu-Kunst'aayah Reconciliation Protocol.

The data collected by BCTS on Haida Gwaii inputs operational costs and timber values into the Market Pricing System data set. This ensures that timber values and Haida Gwaii-specific operational costs are incorporated into the stumpage equation for Haida Gwaii Licensees, including Taan. This data also supports trade agreements, including the Softwood Lumber Agreement with the United States, which facilitates Taan's ability to export timber products. As BCTS is a Provincial organization, net revenues generated from BCTS in Haida Gwaii are included into provincial revenue. This revenue is delegated by the Provincial government to provide services and infrastructure provincially.

BCTS on Haida Gwaii

Q: *How did you get approval to sell the Timber Sale just south of New Town (DEL007 and NAI001), if there were concerns for flooding, cultural features, habitat and visuals?*

A: BCTS developed the NAI001 and DEL007 blocks in accordance with the HGLUO. There were questions raised by Old Massett and the Solutions Table regarding hydrology, cultural features, habitat and visuals. To address cultural concerns, a Cultural Features Identification Survey was completed by CHN-certified surveyors and an Archeologist's assessment was also completed. A professional Hydrologist was contracted to assess the impact of the development on the hydrological function of the area. A visual assessment was completed for this Timber Sale.

Q: *Why doesn't BCTS just leave Haida Gwaii?*

A: BC has a Provincial target for BC Timber Sales to sell 20% of all timber in the Province in order to collect credible representative data for the provincial Market Pricing System. BCTS has an available apportionment on Haida Gwaii that has been approved by the CHN and the Province. The data collected by BCTS on Haida Gwaii ensures that timber values and Haida Gwaii specific operational costs are incorporated into the stumpage equation for Haida Gwaii Licensees. This data also supports trade agreements, including the Softwood Lumber Agreement with the United States, which facilitates businesses ability to export timber products. Timber Sale auctions also provide opportunities for BCTS registered bidders to access timber and generate direct and indirect revenue for the Province and local economy.

Q: *How much does it cost for BCTS to operate on Haida Gwaii?*

A: Operational cost for development, silviculture, roads and overhead are typically around \$20-25/m³.

Q: *Will the Community Forest Agreement lead to an increase in logging on Haida Gwaii?*

A: Not likely. The annual allowable cut is not expected to lead to an increase as a result the issuance of an area-based Community Forest Agreement. The area proposed to be included for the Community Forest is being removed from the Timber Supply Area which is already included in the AAC determination for Haida Gwaii.

Q: *Of Haida Gwaii's total available volume, how much does BCTS sell annually?*

A: BCTS annual available volume is 19% of Haida Gwaii's total allowable annual cut, which equates to 175,868 m³. On average, over the previous 5 years, BCTS has sold approximately 134,000 m³/year, or 75% of BCTS's allocated volume.

BCTS Haida Gwaii Forest Stewardship Plan (FSP)

Q: *Why is BCTS not pursuing another group FSP with the rest of the licensees?*

A: The licensees have decided to sign separate FSPs, in part because they have different third party forest certifications. These certifications standards require slightly different results, strategies and tracking requirements. The separate FSPs are expected to be very similar in nature as the HGLUO dictates the majority of the results and strategies for Haida Gwaii.

Q: *When does the current Forest Stewardship Plan Expire?*

A: January 18th, 2018.

Western Red and Yellow-cedar Management

Q: *Have you identified the area with Yellow-cedar by Pure Lake as a rare site series? If so, what is your plan to protect this site series?*

A: No. BCTS, the CHN and the Province have not assigned a rare site series in relation to the distribution of Yellow-cedar in the Naikoon Landscape Unit. BCTS is working to quantify and assess cedar stand composition in the Naikoon Landscape area, which includes the Pure Lake area, and is developing a retention strategy specific to Yellow-cedar. This includes developing new data collection practices, reviewing current research initiatives and management recommendations in coordination with other qualified professionals in Haida Gwaii and elsewhere.

Q: *Why would you harvest in the Pure Lake area until more is known about Yellow-cedar decline, and what is your Yellow-cedar management plan? Can you adopt a precautionary approach to Yellow-cedar harvesting in the Naikoon Landscape Unit, until more is known about Yellow-cedar decline?*

A: BCTS is maintaining communication with the CHN and the Integrated Stewardship Team regarding yellow-cedar concerns in this area. BCTS is closely monitoring available information, to make informed management decisions. The cedar strategy identified above is based on an understanding of the issue and best practices to ensure healthy forests, which contain red and yellow cedar, for future generations. Research and management recommendations for areas with yellow cedar mortality, particularly in areas of decline include conservation and regeneration prescriptions

Q: *Why is BCTS not harvesting its entire cedar target? What is motivating or causing this reduction?*

A: BCTS has sold a volume of cedar that has totalled very close to 100% of the Chief Foresters cedar target, since this target was set. BCTS has committed to manage cedar harvest volumes in accordance with this recommendation. The

cedar target is based on an average volume per year. Cedar harvest levels vary from year to year, based on stand composition and species compositions of different operating areas. Recent cutblocks sold have had cedar ranging from 2% to 60% cedar; therefore some Timber Sales and yearly totals have higher cedar content than others.

Haida Culture

Q: *Is there any consideration for the cultural values of the forest in the Naikoon Landscape Unit?*

A: Absolutely. All proposed developments have Cultural Features Identification (CFI) Surveys completed by a CHN certified surveyor and are subject to audit by the CHN. BCTS developments are completed in accordance with the CFI recommendations and the HGLUO, which include specific cultural objectives. Proposed developments are reviewed by the Haida Gwaii Solutions Table.

Q: *How does BCTS manage for medicinal plants?*

A: On a landscape level, there are several objectives within the HGLUO that dictate management for Haida Cultural use, including medicinal plants. This includes the designation of Forest Reserves and Cedar Stewardship Areas. On a site specific level, all proposed developments have a CFI Survey completed by a CHN-certified surveyor. This survey identifies Haida Traditional Heritage and Forest Features such as Culturally Modified Trees, Monumental Cedar and medicinal plants. BCTS incorporates the recommendations of the survey into all developments to ensure that features are managed in accordance with the HGLUO. This survey is submitted to the CHN and reviewed by the Solutions Table.

Riparian Management

Q: *How does BCTS manage the integrity of watersheds?*

A: The HGLUO has specific objectives to manage watershed hydrology, which includes landscape-level watershed harvest limits, as well as appropriate buffers on flood plains and fish habitat (see answer below). For example, there are limits to the extent of harvest on a landscape and watershed subunit level. During planning, BCTS assesses the hydrological impact at the watershed subunit level of proposed developments, prior to work in the field. There is also Provincial legislation which includes objectives such as siltation management, road building and deactivation.

Q: *How are fish streams protected?*

A: There is a multitude of legislative and regulatory requirements that protect fish streams. Several of which are Haida Gwaii-specific and considerably more stringent than the rest of the Province. The management of riparian areas has undergone considerable changes in the last 7 years in Haida Gwaii. This includes the Forest and Range Practices Act (FRPA), Fisheries Act (Federal), HGLUO aquatic objectives. Typically, fish streams get a 2 tree-length buffer on either side (based on the tallest trees in the riparian area). BCTS also incorporates wind-firming, road deactivation, fish biologist's assessments and engineered crossings into development prescriptions to ensure that all streams are appropriately meeting requirements.

Wood Waste and Residue

Q: *How does wood waste fit into BCTS' management plan? What is the point of leaving wood waste in the block? Why can't it all be used, burned or cleaned up?*

A: Sustainable Forest Initiative (SFI) certification requires us to monitor wood waste. BCTS is continuously reviewing wood fibre needs of our clients and the community and striving to find the balance. This involves site ecology, timber product markets, fibre needs of the community, and road deactivation prescriptions. There are several fibre recovery initiatives in Haida Gwaii which may increase utilization. Site Plans have requirements for retaining coarse woody debris for biodiversity and plantable spots for regeneration.

BCTS Haida Gwaii is working to increase community awareness of wood fibre recovery opportunities by holding community meetings, posting development plans and developing a TSL status table. This table lists the active and recently completed TSLs, so that the community is aware of who to contact for wood opportunities.

Q: *Who holds BCTS accountable for the amount of waste that is left behind by licensees?*

A: On Haida Gwaii, TSLs are sold as cruise-based sales. This type of billing method means that TSL holders pay for their waste up front, as part of their bid. Waste is managed by FLNRORD on the take or pay system. The take or pay system makes the licensee pay stumpage on all avoidable waste. BCTS monitors waste levels by issuing waste survey contract to quantify the wood volume that remains on the site post-harvest.

Q: *What is the volume actually being taken out of the cutblock?*

A: This number varies significantly by timber type and operating area. Stand volume and type depends on stand composition, ecology, timber markets and timing. BCTS periodically contracts waste and residue surveys to assess the level of fibre utilization and residue left behind. This information can be used to better inform future planning and understand market demand for timber and ecological impacts. BCTS currently has a waste and residue survey contract underway, which will conduct assessments in 36 recently harvested BCTS blocks.

Community Engagement

Q: *What is the point of these meetings?*

A: BCTS has heard from the communities of Haida Gwaii and acknowledges that there needs to be increased direct communication between BCTS and the public. These meetings are meant to provide information on the structure and function of BCTS, to present upcoming plans, and most importantly, to engage face-to-face with the communities so they can provide feedback, ask questions and express concerns.

Q: *How were the meetings advertised, and can they be better advertised in the future?*

A: Notices were posted in grocery stores, coffee shops, the library, gas station and other offices, invitations were emailed to Village and Band Council offices and events were added to the local newspapers' community calendars, two weeks before the meetings. We appreciate and welcome feedback and suggestions.



Q: *Can BCTS include a table on their Development Plan maps that lists the names of the proposed blocks and the respective licence?*

A: Yes. We have taken this feedback and are updating BCTS Development Plan maps to include this list.

Q: *Is it possible for BCTS to improve the capacity of locals to understand forest management?*

A: Yes. The Haida Gwaii BCTS team is invested in improving engagement and information sharing with the communities of Haida Gwaii. Since December 2016, our team will have hosted or participated in 20 public meetings, participated in 3 field trips, partnered with the Haida Gwaii Youth Stewardship Program and have made efforts to improve the availability of information online. That being said, this is just the beginning and BCTS staff recognize there are still many opportunities to engage and exchange information with the public. Other opportunities currently being considered are educational presentations on the Haida Gwaii Land Use Order, and a post-secondary summer student employment program. All feedback and suggestions are welcome.

Silviculture

Q: *What is meant by Free Growing?*

A: Free Growing is a required milestone that all blocks must achieve, 8-20 years post-harvest. This milestone is the point where the block has regenerated and meets stocking standards defined in the Forest Stewardship Plan. These standards include criteria for species composition, height, form, health and density. Once a block is Free Growing, it is anticipated to reach a mature state without the requirement of further management activities.

Q: *Where does the seed for trees planted on Haida Gwaii come from? Why aren't the trees grown in a nursery on Haida Gwaii?*

A: BCTS blocks are reforested with natural regeneration and planted trees. Seeds are chosen in accordance with the Chief Foresters guidelines based on ecological suitability. Seed for BCTS planting comes from both Haida Gwaii and other coastal sources. BCTS is presently developing a Lodgepole Pine and Yellow-cedar seed collection program on Haida Gwaii.

Operating a successful nursery on Haida Gwaii must consider economic factors, such as energy requirements, operational costs, demand, etc.

Q: *The current Forest Stewardship Plan sets our minimum standards for cedar reforestation. Does BCTS plant to this minimum? Why not plant more than the minimum to buffer for possible cedar mortality?*

A: BCTS prescribes planting of cedar at a density that exceeds and often doubles the minimum post-harvest cedar requirements. This prescription provides a buffer against mortality and other forest health issues that may arise during regeneration.

Helpful links

BCTS General Information:

- BCTS Chinook: <https://www.for.gov.bc.ca/BCTS/areas/TCH.htm>
- BCTS Sustainable Forest Management: https://www.for.gov.bc.ca/bcts/forestCertification/SFM_Policy.pdf
- BCTS Environmental Management System : www.for.gov.bc.ca/BCTS/forestCertification/EMS_Policy.pdf
- Sustainable Forestry Initiative BCTS management plan: https://www.for.gov.bc.ca/BCTS/forestCertification/BCTS_Provincial_SusForestMangtPlan.pdf
- BCTS Climate Change Strategy: <https://www.for.gov.bc.ca/bcts/about/climate.htm>
- How to become a BCTS registrant (to bid on Timber Sale Licences): <https://www.for.gov.bc.ca/BCTS/registration/>

BCTS on Haida Gwaii:

- The Haida Gwaii Group Forest Stewardship Plan (2011): https://www.for.gov.bc.ca/ftp/tch/external/!publish/FSP/QCI/BCTS_QCI_FSP.pdf
- BCTS' Draft Forest Stewardship Plan (2018): <https://www.for.gov.bc.ca/ftp/tch/external/!publish/FSP/HG/FSP-2018/>
- BCTS Haida Gwaii Development Plan Maps (2017-2018): <https://www.for.gov.bc.ca/ftp/TCH/external/!publish/FSP/HG/2017-2018-Development-Plan/>
- BCTS-specific Haida Gwaii All-Licensee Forestry Information Sessions (2017) follow up document: https://www.for.gov.bc.ca/ftp/TCH/external/!publish/FSP/HG/2017-2018-Development-Plan/BCTS_Public_Consultation_Topics_Matrix_2017.pdf

Forest Management:

- 2011 Haida Gwaii AAC Rationale: https://www.for.gov.bc.ca/hts/tsa/tsa25/tsr_2011/AAC_Rationale_Haida_Gwaii_MUs_Sept_20_2012_final.pdf
- 2011 Haida Gwaii Timber Supply Review Data Package: https://www.for.gov.bc.ca/hts/tsa/tsa25/tsr_2011/Haida_Gwaii_TSR_data_package_nov_2011.pdf
- Province of BC Forest and Ranges Practices Act (FRPA): http://www.bclaws.ca/Recon/document/ID/freeside/00_02069_01
- Haida Gwaii Management Council: <http://www.haidagwaiimanagementcouncil.ca>
- The Haida Gwaii Land Use Objectives order: http://www.haidagwaiimanagementcouncil.ca/land_use_orders.html
- TCH BCTS Windthrow Manual: <https://www.for.gov.bc.ca/ftp/tch/external/!publish/ems2/supplements/TCH-BCTS-Windthrow-Manual.pdf>
- A Guide to Visual Quality Objectives: http://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/visual-resource-mgmt/vrm_a_guide_to_visual_quality_objectives.pdf
- Factsheet: BC's Forest Economy -- Softwood Lumber: <https://news.gov.bc.ca/factsheets/bcs-forest-economy-softwood-lumber>