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August 9, 2004

Mr. Larry Pedersen, Chief Forester
c/o Forest Analysis Branch, Ministry of Forests
Box 9512, Stn Prov Govt
Victoria, BC, V8W 9C3

***Subject: Expedited Timber Supply Review for the Lakes, Prince George and Quesnel
Timber Supply Areas: Public Discussion Paper, June 2004***

Dear Mr. Pedersen;

Thank you for providing Fisheries and Oceans Canada the opportunity to provide input regarding the potential Annual Allowable Cut increase in the Northern Interior Forest Region. This letter outlines the views of Fisheries and Oceans Canada (DFO) regarding the protection of fish and fish habitat with respect to the proposed timber management strategy to address mountain pine beetle infestations in the Lakes, Prince George and Quesnel Timber Supply Areas, as outlined in the Ministry of Forests (MoF) *Public Discussion Paper (June 2004)*. This Department is very encouraged that landscape level ecological processes are being given an appropriate level of consideration within the timber supply review process¹.

Considering the magnitude and scale of the current bark beetle infestation and the serious implications for forest and land management, this Department believes it is important to provide comment to assist the Ministry in developing a management strategy that ensures appropriate emphasis is placed on maintenance of ecosystem integrity and function at the watershed scale. The Department recognizes the role of bark beetle outbreaks in the maintenance of ecological processes. Research in forest ecology has identified the essential role that natural disturbance plays in shaping forest structure and maintaining ecosystem processes.² Attempting to mimic natural disturbances without mimicking their pattern, frequency and internal variation of retained structures is unlikely to maintain ecosystem structure and function. We are encouraged that the Ministry of Forests recognizes that bark beetle suppression activities are not always effective³ and that poorly planned or executed large scale timber salvage activities have the potential to cause significant impacts on a variety of forest values⁴, including aquatic resources. The Department supports a management strategy which recognizes the need to consider and address watershed scale parameters for the protection of fisheries and water resources. These considerations become more significant in

¹ as identified in Appendix A of the *Public Discussion Paper*

² Biodiversity Guidebook, 1995

³ from the *Public Discussion Paper*

⁴ from Appendix A of the *Public Discussion Paper*



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view of the proposed increases in annual allowable cut and perhaps more importantly for rate of cut issues, which are not specifically addressed within the MOF discussion paper.

It is important to ensure that the Timber Supply Area analysis, and the provincial government's ability to direct and manage large scale salvage activities to recover economic value from affected timber, accurately reflects requirements for riparian and aquatic ecosystem protection.

Given the above considerations, the following points are areas of significant concern to this Department:

- The potential for negative impacts in those watersheds where effective clearcut area and proposed rates of harvest may increase peak streamflows, surface erosion, mass wasting events, stream bank erosion and changes in channel morphology. DFO recognizes that changes to hydrologic processes are already occurring due to the bark beetle epidemic; however, no information is provided identifying how existing forest stand structure and condition (with varying levels of susceptible timber types and infestation) is currently affecting watershed processes.
- The results observed in the Bowron, Slim and Willow drainages when a past bark beetle epidemic was addressed. DFO supports a broader forest management focus that strives to avoid negative impacts to aquatic resources.
- During the Chilcotin beetle infestation and subsequent salvage operations, little research was conducted to provide a greater knowledge base of ecosystem management and significant natural disturbances. The current situation within the central interior, once again poses an opportunity to establish research trials to obtain an improved level of understanding of the effects of large scale salvage operations on specific watershed values.
- The management strategy approved by MOF should recognize, endorse and apply the management directions contained within existing regional Land Use Plans or Land and Resource Management Plans, which specifically address riparian and aquatic protection at the watershed scale.
- The scheduling of forest harvesting (e.g. winter versus summer) to manage the risk of impacts to aquatic ecosystems.
- Efficacy in reducing the impact of increased road density, stream crossings and rate of cumulative construction within specific watersheds. Sediment generated from road construction and maintenance activities continues to be a significant contributor to the cumulative impacts to fish habitat.
- The legal provision for licensees to harvest within riparian reserve zones, with no approval required from the regulatory agencies (i.e. under Section 9 of the Timber Harvesting and Silviculture Practices Regulation).

As identified in the June 2004 *Public Discussion Paper*, the timber management uncertainties related to the bark beetle epidemic supports the need to adopt the “**Precautionary Principle**” management approach. Strategies should be identified and applied in the development of management plans which specifically recommend:

1. Implementation, monitoring and reporting (to regulatory agencies and the public) of Interior Watershed Assessment Procedures for affected watersheds.
2. Protection of streamside and riparian areas by providing adequate riparian reserve and management zones through the application of the *Forest Practices Code* mandatory width requirements (FPC) and *Riparian Area Management Guidebook*, Best Management Practices.
3. Protection for fish streams and those streams that have significant direct downstream effects through application of riparian reserves not specified in the FPC (i.e. S4, S5 and S6 streams).
4. Establishment of ‘indicator basins’ for long term monitoring to help assess and guide present and future best management decisions.
5. Participation by academics and community groups in the development and implementation of an effective monitoring program.

Further to this, the Department wishes to affirm that the federal *Fisheries Act*, and specifically the requirements not to harm fish habitat or deposit deleterious substances into fish-bearing waters, continues to apply to forest development operations within this province. To this end, DFO is committed to working with your ministry to ensure the public objectives of the protection of fish habitat are achieved and look forward to future communications regarding the strategies proposed to address forest health outbreaks, watershed stability and aquatic resource protection.

If your staff has any specific questions regarding the issues and recommendations outlined above, please have them contact Nick Leone at (250) 561-5368 in our Prince George office.

Sincerely,

Michael Crowe, A/Area Chief
Oceans, Habitat and Enhancement Branch
BC Interior

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