

# QUESTIONS FROM THE GAMBIER ISLAND CONSERVANCY AND ANSWERED BY BRIAN KUKULIES, FLNRO, ABOUT THE PROPOSED NEW GAMBIER WOODLOTS (JULY 2013)

## Part 1 Planning and background questions

### *Why more woodlots on Gambier?*

1. What opportunities are there for negotiating the size and/or type of logging that occurs on Gambier? Who would be part of the negotiation? How best would it occur?

A1. Opening size and harvesting system are considered after a Woodlot Licence Plan (WLP) has been approved and are site specific dependent on any constraints, operational requirements, the judgment and knowledge of the Forest Professional. This would be best addressed by the woodlot holder.

2. Are local First Nations and Gambier Island property owners and community consulted at any stage(s) in the process?

A2. First Nations are consulted based on current case law and any agreements that the province has with the potentially impacted First Nations. We have consulted with both the Squamish Nation and the Tsleil-Waututh First Nation. We referred the proposed woodlots to the Islands Trust for comments in 2009. The local community feedback can be provided at the Woodlot License Plan stage.

3. What, if any, are the benefits to the Gambier Island community, and is there anything specific in this regard?

A3. There is the potential for local employment and woodlot operations provide revenue to the province to provide services.

4. Would Ministry of Forest, Lands, and Natural Resource Operations (FLNRO) consider a public meeting on Gambier to respond to islanders' concerns about this process in the near future?

A4. We have met with three local representatives and provided information and answered provided questions so this can be communicated to other members of the public. At this time we have no plans to attend a public meeting in regards to these proposed woodlots.

These woodlots are being considered as a result of government initiative to expand the Woodlot Licence Program through a disposition plan. We had previously evaluated these areas in 2009 for their suitability as woodlot licenses.

### *Deciding on the suitability of a woodlot location*

5. How does the designation of these woodlots fit into FLNRO's "Principles for locating new forest tenures" of Nov 2011?

A5. Woodlot Licenses are in important tenure option that we have to fulfill the need for tenure opportunities and woodlots fit well within smaller forested areas. The proposed woodlot licenses fit in well with the intent of this document.

6. How does the Ministry calculate the overall impact of logging on a closed system such as an island?

A6. Gambier Island is part of the Sunshine Coast Timber Supply Area and is available for timber harvesting consistent with the Official Community Plan and Land Use Bylaw. Assessments of impacts are considered at the cut block road construction stage and must be consistent with the approved Woodlot Licence Plan.

7. Is there any kind of environmental assessment and review involved in the process? Is there any plan to produce Sustainable Resource Management Plans (SRMPs) for the landscape units in the Sunshine Coast Forest District? Specifically Howe Landscape Unit, given the particular sensitivity of island environments? So far, looking at the

FLNRO website, it seems that all that has been done in terms of an SMRP is assignment of Old Growth Management Areas (OGMAs), unlike in BC's Interior, where there has been significant consideration of wildlife and other environmental factors included in SRMPs. FLNRO states "net timber area objectives will be expressed as a percentage of the total land base accessible for commercial forest harvesting, and the proportion for which other purposes – such as managing for old growth, biodiversity, wildlife species at risk and visual quality – will be emphasized." They referred in 2004 to the Horsefly Sustainable Resource Management Plan as a model for how objectives would be calculated in future. Will this kind of assessment be done here?

A7. The proposed Woodlots were evaluated in 2009 to ensure that there was an opportunity for timber harvesting under a woodlot licence. Site specific assessments are completed at the time of proposed development of harvesting areas and roads. The licensee will complete the required assessments to ensure that they are in compliance with their Woodlot Licence Plan.

There are no plans for completing further landscape plans for the Sunshine Coast.

8. Why are these lots coming up for sale now and how was the size determined?

A8. These woodlots were originally developed in 2008-2009 when initial assessments were completed. As part of a Woodlot Licence Disposition Plan the Sunshine Coast was requested to make available for advertising two woodlots. The intent is to advertise these over the next two months.

The maximum size of a woodlot licence is specified in the *Forest Act* as 800 ha for coastal areas. The boundary of these woodlots used existing private land boundaries, Old Growth Management Areas and physical constraints to harvesting.

The woodlots are not "sold". They are offered based on a set of application criteria and the areas remain Crown land and available for others to use the land.

9. Have the woodlots being examined with regard to the type and value of timber and possible coastal sites to dump or take out timber?

A9. The timber types and potential operability constraints have been assessed and there is a suitable opportunity for timber management on these areas.

A reserve for dumping and booming of logs south of Gambier Creek has been in place for many years. This area is being considered for a log dump or a direct to barge load out that will service both woodlot licenses. The woodlot licensees will have the option to explore other options for dumping and booming if they wish.

10. Would FLNRO consider using Gambier forests for some other, more specialized use such as Ministry Permanent Sample Plots (PSP) since there has been a loss of such plots to harvesting in the last few years? FLNRO website states "PSP's matter because they are the only natural-stand data-set that the province has which have been re-measured over time." Perhaps establishing such a data set on-island in Howe Sound would be more valuable to FLNRO than the stumping from these woodlots.

A10. There have been no requests to establish Permanent Sample Plots on Gambier Island. If required other Crown Land areas will still be available on Gambier Island for this purpose.

## Part 2 Implementation questions

### *The bidding process*

11. What are the projected or expected timelines with regard to this project?, When is it likely that FLNRO will be inviting bids on these woodlots?

A11. We are intending to advertise these woodlots within the next two to three months.  
Update: the woodlots are to be advertised at the end of September 2013.

12. Looking at past offerings, 4-5 weeks seems typical of the period for submitting bids. What will the likely bid

period be for these woodlots?

A12. We are intending to allow for up to 60 days from initial advertising to when bids are required. This is to provide opportunities to access the woodlots and to thoroughly evaluate the opportunities, constraints and options to remove the timber from the island.

13. What are the steps for the application process?

A13. Below is the process that is generally followed when developing a woodlot licence. There may be additional steps as a result of circumstances or issues that arise from the development and referral of the woodlot so this is a general outline of the process.

1. Map review of perspective areas to identify any potential land use conflicts.
2. Reconnaissance of candidate areas to confirm suitability for management in a woodlot licence.
3. Complete Allowable Annual Cut calculation.
4. Referrals to government agencies and consultation with First Nations.
5. Formal clearance of proposed woodlot licence area to ensure no land use conflicts.
6. Preparation of Application Package.
7. Advertising opportunity for a woodlot licence.
8. Receive Applications.
9. Evaluate Applications.
10. Award Woodlot Licence based winning application.
11. Applicant prepares management plan for consideration by District Manager.
12. Province consults with First Nations regarding Management Plan and proposed Allowable Annual Cut
13. District Manager Approves management plan and determines Allowable Annual Cut.
14. Woodlot Licence is offered.
15. Applicant accepts offer and woodlot licence is issued.
16. Licensee prepares Woodlot Licence Plan.
17. Woodlot Licence Plan is made available to the public and First Nations for review and comment.
18. Woodlot Licensee considers submitted comments and adjusts woodlot licence plan if appropriate.
19. Woodlot Plan submitted to the District Manager to considerate for approval.
20. Province consults with First Nation regarding woodlot licence plan.
21. Once Woodlot Licence Plan is approved can apply for Road Permits and Cutting Permits.
22. Road Permit and Cutting Permits issued.
23. Harvesting and road building can start.

14. Who is, and who is not, eligible to apply for a woodlot license? Can a logging company apply? Can a major forestry company?

A14. The *Forest Act* specifies who is eligible for applying for a Woodlot Licence. See Section 44 for further information.

Who is eligible:

- Canadian citizen or permanent resident over 19 years of age; a First Nation or a corporation, other than a society that is controlled by people that meet the above qualifications.

Who is not eligible:

- A person holding two woodlot licenses
- Holds an ineligible licence with an aggregate AAC of greater than 10,000m<sup>3</sup>.

A logging company can apply if it meets the above criteria.

If a major forest company has licenses with an aggregate AAC of greater than 10,000m<sup>3</sup>, they cannot apply.

15. FLNRO guidelines state that opening the bids may be a public process. If this request for bids goes ahead, will FLNRO make opening these bids a public process? Where will the bids be assessed?

A15. The information that is publically available at the bid opening includes the Applicants Name. The bids will be opened and assessed in Powell River.

16. In the bidding process, is the bidder made aware of the riparian areas, ecological features, recreational facilities and viewsapes that need to be protected during logging operations?

A16. As part of the application the potential applicants will be urged to thoroughly review the area before making an offer for the woodlot licence(s).

Information on the established visual quality objectives established recreation features and proposed recreation features will be made available as part of the application package.

17. What are the requirements or restrictions on allowable cuts for these woodlots with regard to the amount of timber to be removed?

A17. Annual Allowable Cuts (AAC) is calculated based on the current inventory information, potential growth capacity of the woodlot and potential constraints to harvesting. The AACs for both woodlots are calculated to be approximately 3000m<sup>3</sup> and is calculated to be sustainable for at least 250 years. An applicant may propose a different AAC but this must be justified with further inventory information.

18. Does the woodlot license always go to the highest bidder or can other factors such as experience and reputation of the bidder, whether the bidder is local or First Nations be considered?

A18. Please see the Woodlot Licence Regulation under the *Forest Act* for more information. Three components make up a woodlot application score:

- Bonus Offer up to 50 points
- Proximity of private residence to woodlot licence up to 25 points
- Proximity and area of private Land contributed up to 25 points

These are the only factors that are considered in the score for a woodlot.

## ***Environmental issues***

19. Is there any requirement for wood lot operators to classify streams and assess wildlife impacts before logging takes place?

A19. Yes, streams are classified based on the Woodlot Licence Planning and Practices Regulation (WLPPR).

There is no specific classification/assessment system for wildlife. A woodlot licensee can't damage or render ineffective a wildlife habitat feature. Also, the woodlot licensee must set aside an area from harvesting. The default is 8% which may include riparian areas. There are also wildlife tree retention requirements for the woodlot.

20. There is a substantial designated community watershed on Gambier Creek and surrounding Gambier Lake. What protections does the Forest and Range Practices Act and its Regulations (FRPA) provide for community watersheds?

A20. See Division 4 – Watersheds Woodlot Licence Planning and Practices Regulation  
Can't cause harm to water diverted for human consumption.

Can't cut timber or build road within 100m upslope of a licensed water works where water is diverted for human consumption.

21. How much land will be excluded from harvesting within the two woodlots due to riparian reserves on creeks and streams, community watersheds, possible Wildlife Habitat Areas (WHAs) for species such as marbled murrelet

and tailed frogs, and a lake management zone?

A21. The amount of area removed will depend on the site specific management that will be determined by the forest professional completing the work that is consistent with the approved Woodlot Licence Plan.

There are no Wildlife Habitat Areas (WHAs) within the woodlots. Also, woodlot licensees do not have to create WHAs for these species.

The lake side management zone width will be identified in the Woodlot Licence Plan.

22. Does the FRPA apply to streams and sensitive species (e.g. blue-listed, red-listed) that exist on Gambier, yet have never been formally inventoried by the province?

A22. A woodlot licensee can't damage or render ineffective a wildlife habitat feature.

Woodlot licensee must comply with general wildlife measure if they apply to an area within the woodlot.

23. Are tailed frogs recognized by FRPA as a sensitive species (e.g. blue-listed) and if so what precautions must be taken by a woodlot operator?

A23. Yes, Tailed Frogs are recognized under FRPA. Generally the management of a species like tailed frog would be considered under riparian management.

24. What protection, if any, is given to individual or groups of old growth trees if they are located within an existing woodlot?

A24. There is no specific protection of any old growth stands but there is an option for the woodlot licensee to set these aside. Within the Howe Landscape Unit old growth has been set aside to meet targets.

25. The extent of logging activity permitted in riparian management zones, riparian management areas, and riparian reserve zones appear to be different; what extent of logging activity can we expect to occur in these areas associated with lakes and streams?

A25. This will be dependent on the approved Woodlot Licence Plan, site specific circumstances and Forest Professional preparing any plans so it will vary from site to site. See Division 3 of the Woodlot Licence Planning and Practices Regulation.

26. How about mushroom harvesting? This has a community value but is there any recognition or value for these (e.g. chanterelles) during any stage of the process?

A26. The best time to share this information is with the woodlot licensee when preparing the Woodlot Licence Plan. They will determine if this can be accommodated.

## **Recreational issues**

27. Woodlot legislation seems to suggest that woodlot operators need to take recreational resources such as trails into consideration if they are established with FLNRO before a woodlot-harvesting plan is finalized. Can existing trails within the Gambier island woodlots be established and protected after the woodlot license has been awarded? If trails are taken into consideration, what does that entail? To what extent are trail corridors protected from harvesting?

A27. If an objective for a recreation site, trail or interpretive forest site applies to a woodlot licence area then the woodlot holder must carry out primary forest activities in manner consistent with the objective. Questions concerning the establishment of objectives should be directed to BC Recreation Sites and Trails.

Generally trails are not protected from harvesting. Practices may entail rerouting the trail or re establishment after harvesting.

28. What procedures are in place to ensure that woodlot operators consult with other interested local parties such as

conservation and recreation groups when planning their harvesting?

A28. This will be up to the woodlot holder but initially they will make the Woodlot Licence Plan available to the public for review and comment. The woodlot licensee may engage with local groups prior to the preparation of the Woodlot Licence Plan. The woodlot holder may make other commitments regarding sharing information on harvest planning.

29. How much remediation do woodlot operators have to perform, if recreation resources are impacted during harvesting?

A29. This will be dependent on the individual situation.

30. To what degree and how is recreational access to the woodlots restricted once the license has been awarded?

A30. Generally recreation access to the woodlot will not be restricted. There may be short term access restriction for safety when there are active operations like harvesting and road building being carried out. Woodlots remain Crown land and are available for anybody to use.

### ***Operational Issues***

31. To what degree does FLNRO monitor the operation of the woodlot, particularly with regard to the protection of riparian areas, ecological features, recreational facilities and viewscapes?

A31. There are reviews of operations completed by compliance and enforcement staff from time to time. Operations have to be consistent with approved Woodlot Licence Plan and any harvesting or road building authority. The Forest Range Evaluation Program (FREP) is a system of post harvest audits designed to determine whether forest and range practices are achieving government' For more on FREP, please refer to <http://www.for.gov.bc.ca/hfp/frep/>

32. Is there a possible role for the community or the Gambier Island Conservancy in monitoring the woodlot harvesting operations?

A32. The best possible situation is for the conservancy to develop a good relationship with the woodlot licence holders.