



March 24, 2016

**Bulkley Valley Community Resources Board
PO Box 985
Smithers, British Columbia
V0J 2N0**

Dear members of the Community Resources Board,

Re: Ecosystem Network Concerns in the Bulkley Timber Supply Area

Thank you for your letter of December 15, 2015 regarding your concerns with the integrity of the Ecosystem Network in the Bulkley Timber Supply Area (TSA). On behalf of Jevan Hanchard, Skeena Stikine District Manager, I appreciated the opportunity to speak to your concerns in person at the March 15, 2016 meeting of the Community Resources Board (CRB). As requested by you at the meeting, I am providing a written response to your December 15 letter, and will attempt to answer questions related to each of the three main issues you raise.

1. Changes in Ecosystem Network integrity between 1995 and 2015 for the Seymour Core and adjacent Landscape Riparian Corridors, particularly with respect to firewood cutting and recent road building and harvesting.

Regarding the Seymour Core, the District's perspective is that Core Ecosystem (CE) integrity is maintained if human-caused disturbance does not result in a significant loss of the values that were intended to be captured for the area in question. The District notes the following activities:

- Less than 5 hectares of harvest by the Community Forest over 4 small areas to address mountain pine beetle affected stands, which was subsequently reforested.
- Unregulated firewood cutting in the Wood Road area has resulted in several new access trails and the creation of approximately 2 hectares of new clearing, with one patch greater than 1 hectare and requiring reforestation.

* Please note that this CE was originally well roaded and has considerable private land (~15%).

The District's perspective is that Seymour CE integrity is not at risk from regulated harvest on the Crown land portions. However, unregulated harvest, if it progresses unchecked, could present an issue. The District has installed new signage in relation to firewood cutting and has encouraged Compliance and Enforcement presence in the area to suggest alternate areas to acquire firewood.

Regarding the Landscape Riparian Corridors (LRC) adjacent to the Seymour CE, we trust the CRB is intimately aware of the main land-based objective of "70% greater than 80 years" set for each LRC to represent functional old forest condition. Under that objective, the District's perspective is that the "3 for 10 rule" has been consistently employed for regulated clearcut and partial harvest within LRCs.

For the Bulkley River LRC, 1.1 hectares of harvest has occurred in the Crown Forested Land Base (CFLB). This LRC does not appear to be at risk.

For the Lower Telkwa LRC, the following information indicates that there *is* elevated risk:

- As of 2011, 75.4% of the Lower Telkwa LRC CFLB was greater than 80 yrs. Since then, an additional 39 hectares of harvest has occurred and judging from 2015 imagery, it is mostly small opening harvest, including that by the Village of Telkwa under the Community Wildfire Protection Plan.
- Approximately 30 hectares of harvest has occurred near the end of Tatlow and Chapman Roads, some of which is likely unregulated firewood cutting.

2. Monitoring of structure and function in the Ecosystem Network.

In consideration of the Province's results-based regime, the District has a fair degree of confidence that harvest is being conducted in accordance with the District Manager-approved licensee Forest Stewardship Plan (FSP) Results and Strategies for established objectives in the Bulkley TSA. To date there has not been a reported violation of major licensee FSP Results and Strategies for the Ecosystem Network. This is directly related to the risk associated with structure and function integrity of the Ecosystem Network.

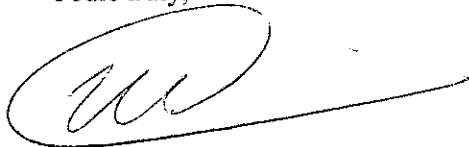
TSA-wide analyses are conducted to track areas harvested and forest green-up against the Higher Level Plan Order (HLPO). Pacific Inland Resources is currently leading an updated HLPO analysis, supported by BC Timber Sales and FLNRO. These analyses can help to identify LRCs or CEs whose integrity may be at risk.

3. Other areas within the Ecosystem Network exposed to factors that may compromise integrity.

Non-forestry factors certainly have the potential to impact the Ecosystem Network, such as wildfire and linear developments. Linear developments that impact the EN, such as pipelines, will be subject to procedures for replacement areas. Natural disturbances are outside the scope of active EN management.

If you wish to follow up on any of these matters, please do not hesitate to contact me. I thank you for your efforts and commitment to sustainable resource management in the Bulkley TSA.

Yours truly,



Ryan Holmes
Acting District Manager