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BRIEFING NOTE FOR DECISION

DATE: July 9, 2025

PREPARED FOR: Jevan Hanchard – Regional Executive Director – Skeena Region

ISSUE: Moving Towards Comprehensive Old Growth Management Approach with First Nations in BCTS Babine Business Area

RECOMMENDED OPTION:
Transition from BCTS' policy on replacement and consultation of TAP (Technical Advisory Panel) old growth deferral areas. Do not find replacement areas. Do not conserve remnant old growth polygons.

BACKGROUND:

- First Nations in the Bulkley, Morice and Lakes Timber Supply Areas (TSA) do not support the TAP deferral area approach to managing old growth.
- BCTS policy states that regardless of First Nation support, 1 of the 3 TAP old growth categories will be deferred – the "remnant" category.
- BCTS Babine (TBA) has harvested portions of TAP areas in moderate to severely burned timber using the specified field verification process.
- TBA has deferred the harvest of 'remnant' category old growth.
- BCTS' current policy states that TAP deferral areas must be replaced, and that First Nations engagement should occur on the replacement areas.
- There are progressive old growth management planning processes in all three BCTS Babine Timber Supply Areas (TSA). Additionally, TBA initiated and implemented the deferral of the Serb operating area – a large intact watershed with multiple values – with support from local First Nations. To date, BCTS Babine has deferred harvest of approximately 10,600 ha of forested area in the Serb with 9240 ha of that being older than 140 yrs.
- BCTS Babine has avoided all Remnant areas due to the BCTS TAP policy. Under the policy, 46 TSL's (or 58%) have been impacted and many of these TSL's have required re-engineering. It is a significant hindrance and economic impact to BCTS operations.
- TAP old growth polygons in BCTS operating area in the Lakes, Morice and Bulkley TSAs do not contribute to the provincial conservation numbers because First Nations did not support implementing TAP.

DISCUSSION:

In 2021 BC initiated a temporary TAP old growth harvest deferral process throughout the province, with the intent of pausing potential old growth area harvest while the province was developing a provincial old growth strategy. In response, BCTS developed a series of stop-gap policies to implement the deferral of TAP in BCTS operating areas. The management approach of Old Growth has progressed in the Skeena Region over the past 4 years, but the BCTS policy has remained static.

There are several current management regimes and protection measures for old growth within TBA operating areas: sustainable resource management plans, riparian management, landscape corridors, OGMAs, core ecosystems, seral stage constraints, ungulate winter ranges, SRMP no timber harvest areas, high biodiversity emphasis areas, wildlife tree retention areas etc. Additionally, TBA initiated and implemented the deferral of the Serb operating area, an intact watershed with multiple values, with support from local First Nations. More notably, all three TSAs have FLPs that are underway. Local First Nations are active partners in the FLP process and have voiced that old growth

should be managed through the FLP process. BCTS TBA operating areas are strongly influenced by landscape fire dynamics. As such, First Nations and stakeholders have strongly voiced that Old Growth should not be managed through static reserves, but rather a natural range of variability be represented on the landscape through active management.

BCTS' current policy states that, when harvested (even if the area has been field verified as non-old growth) suitable replacement areas must be identified and tracked; and further, that First Nations engagement should occur on the placement of the replacement areas. BCTS policy also states that regardless of First Nation support (or non-support) the old growth category of "remnant" will be conserved, even if field verification shows that it does not meet old growth stand conditions.

The decision regarding whether to ratify and implement TAP deferral areas is predicated on First Nation support. First Nations in the Bulkley, Morice and Lakes Timber Supply Areas (TSA's) do not support the TAP deferral area approach to managing old growth. First Nations have voiced concern over BCTS' approach to TAP policy implementation. Going against First Nations volition by continuing to conserve predictive TAP areas and then further engaging or consulting on the replacement locations of the TAP areas is seen as working in direct opposition to the partnership approach that has been established through years of engagement, relationship building and collaborative processes that are under way in the region.

To date, TBA has harvested portions of TAP polygons where extensive field verification has shown that the areas do not meet old growth characteristics, mostly in moderate to severely burned timber. TAP polygons in BCTS Operating areas are not endorsed and do not contribute to provincial old growth targets. TBA has fully deferred the harvest of remnant; and the identification of TAP replacement areas is being considered. Decisions should be made on the approach TBA should take:

1) whether remnant old growth polygons should remain protected as static reserves
2) whether TBA should additionally identify and conserve replacement areas
3) whether TBA should consult with First Nations on the replacement areas
4) or whether TBA should transition to current management regimes and collaborative FLP planning processes

OPTION 1: Transition from BCTS' policy on replacement and consultation of old growth deferral areas. Do not find replacement areas. Do not conserve remnant old growth polygons.

Implications:

- *Significant savings of staff time and program financial resources*
- *Timber Sales Licenses can be made available to the market sooner to support BCTS objective of selling full rationalized apportionment*
- *Demonstrates respect of the First Nations responses that do not support the old growth management through the TAP deferral process*
- *Does not add administrative burden to First Nations through additional consultation*
- *May invoke scrutiny from conservationist ENGOs*

OPTION 2: Deviate from BCTS' policy on replacement and consultation of old growth deferral areas. Do not find replacement areas.

Implications:

- *Significant savings of staff time and program financial resources*
- *Timber Sales Licenses can be made available to the market sooner to support BCTS objective of selling full rationalized apportionment*
- *Does not demonstrate respect of the First Nations' responses to the TAP deferral process*
- *Adds administrative burden to First Nations through superfluous consultation*

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- *Conserves additional old growth and mature timber beyond government's commitments, within the working forest*

OPTION 3: Fully Implement BCTS current policy. (replace and consult)
Implications:

- *Prolongs significant costs of staff time and program financial resources*
- *Timber Sales Licenses will be delayed and not available to the market to support BCTS objective of selling full rationalized apportionment*
- *Does not demonstrate respect of the First Nations' responses to the TAP deferral process*
- *Adds administrative burden to First Nations through superfluous consultation*
- *Conserves additional old growth and mature timber beyond government's commitments, within the working forest*

RECOMMENDATION: Option 1

Approved / Not Approved

For Jevan Hanchard
Signature
Jevan Hanchard – Regional Executive Director (Skeena) – Ministry of Forests

8 Aug 2025
Date

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REVIEWED BY:

	Initials	Date
BCTS WM	MW	July 31 2025
BCTS FOM	KP	July 30, 2025
Skeena DSI	TD	July 30, 2025
Skeena RED	JH	July 18, 2025
BCTS Exec Dirictor	AP	August 7, 2025
BCTS Director Sustainability	LS	August 7, 2025
Nadina District Manager	NM	Aug 1, 2025