

Direction for Forest Landscape Planning in the Kootenay Lake Timber Supply Area

Forest Landscape Plans (FLPs) represent the most consequential shift in forest governance in British Columbia in decades. The shift to more localised decision-making in the form of FLPs will only result in durable biodiversity protection if an ecologically based approach is applied to (1) assessing values, risks and impacts to ecosystems and habitats which then informs emphasis on areas for protection, resource use and restoration, and (2) establishing precautionary targets for old and mature forest retention. These steps must reflect expected natural disturbance levels, sometimes referred to as the Range of Natural Variability (RONV).

The Engagement Process: Late, Narrow and Pre-Shaped

Before turning to substance, we must address the engagement process itself. The Kootenay Lake FLP has been under development with First Nations partners and forest licensees since at least November 2025. At that time, a public engagement window with the Ministry of Forests appeared to open, but when the public followed through as suggested on the website, public feedback was cut off. In the meantime, a planning team has been assembled, forest values are being assessed, and a forest landscape model is already generating indicator outputs. The public is only now — in a survey window running June 22 to August 21, 2026 — being asked which values matter most to us, after much of the work that will determine the plan's outcomes has already been built. Inviting the public to rank values at this stage, while presenting that exercise as though it will shape the plan's direction, risks being engagement in form rather than in substance.

A recent internal Ministry of Forests document has come to light which sets the stage for how the ministry views public opinions. The memo clearly states that MOF District Managers are “not required to consider the information submitted by the public” yet in the very same memo encourages its readers to direct the public to different public engagement forums.

It is also our understanding that where a finalized FLP would materially change the timber supply in a timber supply area, that change cannot be made by the planning team alone — it must flow through the Chief Forester's allowable annual cut (AAC) determination under the Forest Act and, depending on its scale, may require direction or authorization at the Cabinet or Ministerial level rather than emerging from the FLP engagement process as currently presented.

We ask the Ministry to confirm, on the record and in plain language: what magnitude of change to the Kootenay Lake TSA timber supply can result from this FLP without further Cabinet or legislative authorization, and which decision-maker holds that authority? The public cannot meaningfully weigh in on trade-offs without knowing where the real decision sits. If the timber

supply outcome is in practice constrained or pre-committed before this survey closes, the public deserves to be told so plainly.

The Survey Questions Are Leading — How to Respond

Several survey questions are difficult to answer honestly because the answer depends entirely on one's faith in status quo forestry, and the questions are framed to pry out a specific response. We flag this directly for the many community members who will fill out this survey, because how you answer matters.

Take the "Climate Change Resilience" value, which the survey ties to actions such as assisted species migration, stand density management and drought-tolerant species. This government has made clear that it equates climate response with "active management" — including inside provincial parks. Yet a wide contingent of people, including many professional biologists, ecologists, wildfire specialists and hydrologists, question whether status quo forestry can manage its way out of a climate problem it helped create. Consider the most common forest type in the Kootenay Lake TSA, Interior Cedar–Hemlock (ICH). Is logging the remaining climate- and drought-vulnerable cedar–hemlock forests and replacing them with plantations of other species a climate solution? This government appears to think so. How is a respondent meant to rate this "not important" through "very important" without handing the Ministry the answer it wants to hear? Rating climate change "very important" is liable to be read as endorsement of intervention and logging-based "active management," when many of us are extremely concerned about climate change precisely because we want threatened landscapes like old ICH preserved, not converted to tree farms.

The same trap appears in the "Sustainable forest economy" value — forest-related industries remaining productive, diversified and innovative, supporting stable local employment. Of course we all want that. But take mass timber construction. If logging practices do not change, and high ecological value forest continues to be clearcut to feed the mass-timber supply chain, is that something we should support in any way? No. In the absence of good governance for ecological values, a respondent who cares about those values may have to answer "NOT IMPORTANT" — even though our true position is more nuanced and would be different if the survey allowed it to be expressed. The instrument forces a blunt answer to a question that deserves a conditional one.

The ranking exercise compounds the problem. Asking respondents to rank values against one another is close to impossible when a high ranking for "Climate Change Impacts" is liable to be interpreted by Ministry staff as a mandate for intervention and so-called active management. A respondent could be extremely concerned about responding to climate change and yet want that response delivered through the preservation of threatened landscapes — like old ICH —

rather than through logging them and replacing them with tree farms of different species. The ranking format cannot capture that distinction, and so it manufactures consent for an approach many respondents would reject.

Our practical guidance to respondents is therefore this: where a question conflates a value you hold (climate resilience, a sustainable economy) with a management approach you reject (conversion of high-value natural forest to plantations), use the open-text fields to say so explicitly, and do not let a numerical rating stand in for your actual position. We urge the planning team to record these qualifications, and we ask that the “What We Heard” report disclose how many respondents rejected the framing of the questions rather than the underlying values.

Context for the Development of a Kootenay Lake FLP

In drafting an FLP for Kootenay Lake Timber Supply Area (KL TSA), context is important. The province has offloaded conservation trade-off decisions onto First Nations (FNs), communities, and community forests but has largely avoided tenure reform. The province's commitment to DRIPA is intended to protect FN's rights and interests and requires their free, prior and informed consent on resource management decisions, but their input is not being implemented. Instead, corporations such as Interfor and Canfor — whose primary obligations are to shareholders rather than the public trust — continue to dominate local forestry decision making. Overharvesting in KL TSA has led to the steady depletion of primary, old and high value forests and associated habitat for dependent species. It has also resulted in a merchantable timber fall down and an inability to comply with even minimum (2/3 drawdown) legal old forest targets in most ecosystems at the landscape unit (LU) scale.

At the same time, the province has stalled on its commitments to implement the Old Growth Strategic Review (OGSR), the Old Growth Technical Advisory Panel (TAP) recommendations, and the Biodiversity and Ecosystem Health Framework (BEHF). To date, the province has failed to develop Species at Risk (SAR) legislation, make meaningful progress on meeting 30x30 conservation targets, establish stronger protections for watersheds, or for logging on private land. BC's Professional Reliance Act relies on professionals to oversee their own work and to report on their peers, which government's own study called “putting the fox in charge of the henhouse.”

This context reinforces the need for an ecological approach focused on ecosystem, biodiversity and cultural values (and the application of defensible retention targets informed by RENV) to achieve sound forest stewardship. Doing so will also serve to generate greater certainty, reduce future conflict, and better align land-use decisions with the long-term public interest.

Clear Objectives, Timely Actions and Monitoring of Expected Results

BC has developed many different forestry strategies and planning initiatives to try and improve a broken system, however progress on forestry reform has been marginal at best. Part of the problem lies in the gap between stated objectives and on-the-ground results. The FLP for KLTSA must address this gap by ensuring that objectives are clear, actions are transparent and fully implemented, and results are measurable, verifiable and effective to achieve objectives. Follow-up monitoring for compliance and effectiveness is needed, as is enforcement, where necessary.

The need for ongoing monitoring and public reporting cannot be overemphasized, to provide assurance and inform adaptive management where needed. FLPs are intended to be updated every ten years, which provides a pre-established minimum timeline for adaptive adjustments, although interim reporting and refinements would be helpful.

Outcomes framed many decades into the future can appear ambitious but still permit irreversible near-term losses. Objectives must therefore be framed to achieve some results in the near term, while recognizing that they may be part of a longer-term desired trajectory. Clearly, time-sensitive values such as old growth require immediate protection and long horizon recovery timelines should be avoided.

The FLP for TFL 37 (the first pilot to reach a signed Section 7 joint decision-making agreement, finalized January 2026) uses hundreds of examples of directional language such as “can,” “could,” “may,” “seek to,” “consider,” “balance”, “where feasible” or “practicable”. Directional language must be minimised as it has potential to undermine clear requirements and achievement of expected results.

Zonation that Reflects Current Ecological and Cultural Values, Risks and Impacts

BC’s existing forest management framework involves zonation of landscape units (LUs) into high, intermediate or low “Biodiversity Emphasis Options” (BEOs) based primarily on timber values. This is reflected by the current allocation of the land base into 10% high, 45% intermediate and 45% low BEO categories. This very skewed zonation informs management emphasis to be placed on conservation, restoration and/or resource use, thereby “setting the stage” for most FLP decisions, including what allocation thresholds and retention targets are assigned to those BEOs. Accordingly, the FLP should:

- a) Update the entire BEO zonation framework based on credible assessment of current ecological/cultural values and current and future risks from forestry, cumulative resource use, and accelerating climate change.
 - This includes reconfiguring areas mapped high, intermediate and low BEO and establishing precautionary percent allocation thresholds for BEO categories.

- Areas warranting special consideration include intact/sensitive watersheds; listed, rare, unique and/or under-represented ecosystems, seral stages and habitat types; critical and sensitive habitats; and cultural areas and/or ecological features.
- Predictive tools will be required where current inventories are lacking.

Old and Mature Forest Retention Based on Expected Amounts by Ecosystem

The percent of primary and old growth forests remaining in most LUs is only a fraction of expected RENV amounts. These residual forests are fragmented into disproportionately small-sized patches dominated by edge, with little intact interior forest habitat. Continued overharvesting and accelerating climate change impacts undermine biodiversity, climate resilience, hydrological/terrain stability, and landscape connectivity of these stands. Temporary Old Growth Deferral Areas (OGDAs) play a critical role in preventing irreversible biodiversity loss, while longer-term planning proceeds.

Unanimous FNs support for deferrals in Kootenay Boundary Region (KBR) should be reflected in their permanent protection in FLPs. Current ambiguity regarding OGDA permanence coupled with regional MOF guidance to licensees is resulting in ongoing OGDA incursions (for roads, logging of stands <2 ha in size, and salvage of wildfire, insect, disease and blowdown areas, as well as for wildfire hazard risk reduction), often without OGDA replacement. This guidance is inconsistent with local FNs unanimous support of voluntary deferrals and constitutes DRIPA infringement, while serving to further fragment and erode OGDA values, not to mention public trust. While FLPs are underway or planned in KBR, voluntary deferrals must be fully respected to prevent further loss of limited opportunities to protect primary and old growth forests.

Accordingly, the FLP should:

- a) Fully retain all primary and old growth forests to meet ecologically based old forest targets that must be updated in the FLP to be more precautionary. This will require recruitment of old forests where updated targets cannot currently be met.
 - Spatially map all primary and old growth forests using best available science;
 - Designate and legally protect these areas prior to operational planning;
 - Ensure adequate treed buffers around them and linkages to other reserves (e.g., parks and protected areas) and designated management areas (e.g., intact and sensitive watersheds, OGMAs, UWRs, GAR areas, critical habitats, WHAs, WTPs, etc.) whenever possible.
- b) Ensure that no further incursions and fragmentation of OGDAs occurs while FLPs are underway or planned in KBR, consistent with DRIPA and FNs stewardship obligations.
- c) Monitor for compliance with updated targets for old forest and mature forest retention (not be combined as they are different) in BEC version 12. Ensure that what is being retained is in fact old forest or mature forest, respectively, rather than OGMA area that

does not meet explicit age thresholds for old forest and mature forest in particular ecosystems.

- d) Conduct enforcement where required.

Implement Connectivity Corridors as a Landscape Scale Requirement

Landscape resilience depends as much on ecosystem connectivity as on the protection of individual areas. Connectivity between and within landscapes (and across elevational gradients from valley bottom to upper elevation passes) is vital to maintain seasonal wildlife movements, dispersal and gene flow for wide-ranging species. Once fragmented by roads and logging, these areas are exceptionally difficult to restore. Even widely spaced protected areas without viable connectivity in the matrix surrounding them are isolated and require matrix rehabilitation to restore function.

Portions of the BCTS operating area between Kaslo and New Denver function as an important wildlife corridor linking Kokanee Glacier Provincial Park and the Goat Range, with similar connectivity linking the Purcell, Goat and Valhalla Ranges. The KBLUP and the BC Biodiversity Guidebook acknowledge the importance of connectivity corridors to selected species (e.g., grizzly bear) and to biodiversity as a whole. Several initiatives to map wildlife connectivity corridors have already been completed in KBR, which would inform their implementation in the FLP, yet connectivity is currently treated as a conceptual objective.

- a) Apply findings of connectivity mapping already completed or underway (e.g., Argenta Face, Purcell Wilderness Conservancy, Indigenous Protected Area).
- b) Complete mapping of connectivity corridors in the context of forestry and cumulative impacts and assess restoration needs.
- c) Make connectivity a legal requirement and manage connectivity corridors spatially as enduring landscape features in the context of all resource use.

Summary of Core Direction

A credible FLP must be supported by ecologically and culturally based landscape zoning with defensible retention targets made transparent to all parties. The FLP must:

1. Update BEO zonation framework and thresholds based on credible assessment and mapping of current ecosystem, biodiversity and cultural values, impacts and risks.
2. Update the old and mature forest retention targets (by ecosystem within LUs) based on expected natural disturbance (RONV).
3. Identify and implement ecosystem-based management of legal wildlife connectivity corridors linking major mountain ranges, watersheds and protected areas as a landscape scale requirement.

4. Implement ongoing monitoring to ensure compliance with zoning, targets and corridor management, and where necessary, follow up with enforcement.
5. Establish transparent public reporting of FLP implementation progress and monitoring outcomes, as a rationale for consideration of adaptive adjustments.

Closing

The Kootenay Lake TSA presents a rare opportunity to demonstrate what modern landscape planning in British Columbia can achieve. Success will depend on early identification of areas and values of higher ecological/cultural significance and an updated management framework with defensible thresholds and targets to maintain them, based on credible risk assessment. Once established, the latter will provide the foundation upon which responsible and durable resource management decisions can proceed.