

FORMAL COMPLAINT TO ASSOCIATION OF BC FOREST PROFESSIONALS

26 July 2017

I: INTRODUCTION

This complaint concerns a professional forester, hereafter referred to as RTF, who between 2015 and 2017 facilitated several large industrial clearcuts near Wells Gray Park. It is alleged that RTF's actions were both inconsistent with sustainable forestry and out of keeping with his professional obligations as a member of the Association of British Columbia Forestry Professionals (ABCFP).

The decision to proceed with this complaint is informed, first, by the considerable authority accorded to professional foresters under the B.C. Forest and Range Practices Act and, second, by the substantial adverse impact RTF's recommendations will likely have on a Mountain Caribou herd already in rapid decline.

II: BACKGROUND

Concerns over the impacts of industrial logging in the Upper Clearwater area, two hours north of Kamloops, have been in the public eye since January 2012 when Canadian Forest Products Ltd (CANFOR Vavenby) announced its intention to log hundreds of hectares on the eastern and, more recently, western slopes of the Upper Clearwater Valley immediately adjacent Wells Gray Provincial Park.

Concerns included impacts to local hydrology and Mountain Caribou, though of overarching concern was CANFOR's refusal to meaningfully engage with a pre-existing consensus-based agreement between local residents and the B.C. Ministry of Forests (now Ministry of Forests Lands and Natural Resource Operations, henceforth FLNRO). The agreement is called the *Guiding Principles for the Management of Land and Resources in the Upper Clearwater Valley*. The *Guiding Principles* was initiated in November 1996 by the B.C. Ministry of Forests (now Ministry of Forests Lands and Natural Resource Operations Clearwater District, henceforth FLNRO) and signed into effect by the District Manager 18 months later: <https://1000clearcuts.ca/guiding-principles/>. In effect the *Guiding Principles* was a Local Use Agreement under the Kamloops Land and Resource Management Plan¹.

Among other highlights of the *Guiding Principles* agreement are the following stipulations:

1. that local residents should henceforth have a meaningful say in forest-based decisions affecting their valley.
2. that forestry activities in the Upper Clearwater Valley should henceforth be vetted through a government-appointed citizen committee called the Upper Clearwater Referral Group: <https://1000clearcuts.ca/referral-group/>.
3. that forestry activities in the Upper Clearwater Valley should henceforth be restricted to salvage operations.

4. that the quality, quantity and timing of water flow in six named streams – Fage, Ordschig, Case, Byrd and Duncan Creeks and Shook Brook – should be maintained within their natural range of variability.
5. that existing oldgrowth forests within the Upper Clearwater Valley should remain unlogged.

The Upper Clearwater Referral Group brought these items to CANFOR's attention in a meeting held in January 2012, following which CANFOR presented the Referral Group with its draft cutting plans. In June 2012 the Referral Group brought these plans for review by valley residents who, after careful consideration, voted unanimously to oppose them on the grounds that they did not respect the intent of the *Guiding Principles*. This process was repeated with the same result on three separate occasions between 2012 and 2014, such that relations between CANFOR and valley residents became increasingly strained.

Tensions diffused somewhat in the spring of 2015 when RTF, took over as Canfor's forest planning supervisor. In a meeting with the Upper Clearwater Referral Group soon after his arrival, RTF (together with his supervisor) indicated a willingness to engage with the terms set out within the *Guiding Principles*². It was in this understanding that the Referral Group ultimately agreed to enter into a formal Information Exchange Process with RTF and his supervisor on behalf of CANFOR Vavenby, as well as with a representative from FLNRO³.

This Information Exchange Process took place over six meetings held between November 2015 and June 2016. Regrettably, most of the items that form the basis of this complaint came to light during the course of this Information Exchange Process⁴. Because, however, RTF's supervisor is no longer an employee of CANFOR Vavenby and, further, because his absence has not noticeably brought CANFOR's planning process into closer alignment with the professional obligations of its forest planning team, this complaint is directed against RTF, who remains CANFOR Vavenby's Forestry Planning Supervisor as of this writing and is a member of ABCFP.

III: WHEREAS ...

WHEREAS 1: UNDER B.C.'S FOREST AND RANGE PRACTICES ACT (*FRPA*), CONSIDERABLE AUTHORITY IS GIVEN TO THE PROFESSIONAL JUDGEMENT OF QUALIFIED EXPERTS.

Under *FRPA*, all logging proposals that are consistent with the objectives stated in a FLNRO-approved forest stewardship plan and signed off by the company's professionals must be approved by FLNRO (if FLNRO decides that First Nations rights and title have been respected). Forest licensees and their professionals make the final decisions about how to balance resource values and minimize risks. The FLNRO District Manager has no authority to deny a cutting permit or road permit even if he or she is of the opinion that carrying out the actions authorized by the permit would destroy critical habitat of an endangered species.

Because professional reliance is thus accorded considerable authority in the forestry planning process, it is incumbent upon industry representatives to ensure that the consultants hired to help prepare company harvest prescriptions are well qualified within their given field, be it hydrology, terrain dynamics or, as in the present case, wildlife management.

RTF set an unacceptably low bar with respect to his use of professional reliance. This manifested in a number of ways – see item 14 in Appendix 1 – but above all in his decision to hire a wildlife biologist who had little if any training in or experience with the Southern Mountain Caribou, i.e., the primary species at risk here. Not only did this result in inappropriate harvesting prescriptions in an area federally designated since 2014 as Critical Habitat for Caribou under Canada’s Species at Risk Act (Figure 1), it also subsequently triggered an emergency protection order under SARA: <http://1000clearcuts.ca/wp-content/uploads/2017/04/2017-04-07-SARA-s.80-Wells-Gray-Thompson-caribou-emergency-order-application.pdf>. Unfortunately, efforts to lodge a formal complaint against the biologist in question were compromised by the refusal of RTF to allow free public access to her report⁵. This in our view places RTF even further at odds with his professional obligation to FRPA. It seems fair to ask how a professional reliance system like FRPA can function properly when information pertinent to CANFOR’s social license to log on public land is withheld from the public.

Interpretation: RTF’s decision to hire a consultant working outside her competency appears to be in breach of ABCFP Code of Ethics 5.4: The responsibility of a member to the profession is to “seek assistance from knowledgeable peers or specialists whenever a field of practice is outside the member’s competence.”

Figure 1. CANFOR’S proposed cutblocks on the eastern slopes of the Upper Clearwater Valley as of 13 June 2017. A cutting permit has been awarded for block T-121 while cutting permits for blocks T-106, T-115, T-122 and T-123 are pending. Note the overlap with federally designated Critical Habitat for Caribou under Canada’s Species at Risk Act.

WHEREAS 2: IT IS CANFOR’S EXPRESS POLICY NOT TO SUPPORT ACTIONS THAT IMPACT CRITICAL HABITAT FOR SPECIES AT RISK.

On 9 July 2012, in a presentation to the B.C. government’s Special Committee on Timber Supply (Appendix 4), CANFOR CEO and President Don Kayne stated, in part, that CANFOR “*will not support actions that impact parks, riparian areas or areas that provide critical habitat for species at risk...*” On 16 July 2012, Mr. Kayne published a similar assertion in the Vancouver Sun (Appendix 5). In the earlier of these two communications, he emphasized that this commitment formed part of CANFOR’s social license. To the best of our knowledge, Mr. Kayne, who remains president and CEO of CANFOR, has not withdrawn this claim.

The Southern Mountain Caribou has been in decline for some time. Two populations have disappeared since 2002 while most of the remaining 15 herds continue to dwindle. In June 2014, the federal Minister of Environment posted on the SARA registry a final “Recovery Strategy” under the Species at Risk Act for the Woodland Caribou, Southern Mountain population. The 2014 Recovery Strategy specifically determines that matrix range is critical habitat for the southern mountain caribou. Matrix range is outside the designated seasonal ranges. Type 2 matrix range (overlapping with Canfor’s cutting proposal) consists of areas surrounding annual ranges where predator/prey dynamics influence caribou predation rates within the subpopulation’s annual range This is important because B.C.’s legislative framework and 2007 Mountain Caribou Recovery Implementation Plan provides mandatory protection only within defined subareas within what B.C. refers to as “core habitat,” which does not generally include matrix range.

The Mountain Caribou of Wells Gray Park have declined by roughly one-half in the past decade (Figure 2). The ultimate cause of this decline is widely accepted to be industrial logging near the park. In light of this, the Federal Mountain Caribou Recovery Strategy in 2014 designated most of the

Clearwater Valley adjacent to southern Wells Gray as Critical Habitat for Caribou under Canada's Species at Risk Act. The clear intention was to call attention to the need to slow rates of cut here.

Here we reference *BC's Mountain Caribou: Last Chance for Conservation?*, a Forest Practices Board report released on 29 September 2004: "All mountain caribou in Canada are nationally designated as 'threatened'. Threatened status means that action is required to improve caribou survival in order to avoid extinction. In 1996, British Columbia signed the National Accord for Protection of Species at Risk. That agreement obliged the province to act to protect species at risk and their habitats ..." It is our understanding that B.C.'s federal obligation to the National Accord both predates and overrides FRPA – ethically if not necessarily legally; though note Section 80 under Canada's Species at Risk Act.

In his capacity as Canfor Vavenby's forestry planning supervisor, RTF has consistently argued that Canfor has a legal right to log in federally designated Critical Habitat for Caribou – the implication being that Canfor's right to log near Wells Gray Park trumps the Mountain Caribou's right to exist here. Notably, RTF has been a key player in the recent loss of hundreds of hectares of Critical Habitat for Caribou on the western slope of the Clearwater Valley (Figure 3). His well-known attitude vis-à-vis Wells Gray's endangered Mountain Caribou is captured in the exchange described in Appendix 2 – this notwithstanding repeated efforts by the Referral Group to explain to RTF the causal connection between logging outside the park and caribou decline within it.⁶

Interpretation: Here RTF appears to be in breach of ABCFP Code of Ethics 3.1: The responsibility of a member to the public is to "advocate and practice good stewardship of forest land based on sound ecological principles to sustain its ability to provide those values that have been assigned by society."

Figure 2. Southern Mountain Caribou decline in Southern Wells Gray Park and vicinity between 1995 and 2015.

Figure 3. The survival and recovery of Wells Gray Provincial Park's Mountain Caribou depends both on 'primary habitat' within their annual range and on 'matrix habitat' outside their annual range. Type 1 matrix habitat (blue) consists of high-elevation oldgrowth forests, whereas Type 2 matrix habitat (yellow) consists of low- to mid-elevation mature forests that when logged enhance predators that sometimes kill caribou. In 2014 the area in yellow was federally designated in the Species at Risk Act Recovery Strategy as Critical Habitat for Caribou, yet the B.C. government continues to authorize its destruction one cut block at a time - with many more cutblocks soon to come. RTF at CANFOR Vavenby is ultimately responsible for laying these out.

WHEREAS 3: CANFOR DOES NOT SUPPORT ACTIONS THAT OVERTURN LANDSCAPE OBJECTIVES SET THROUGH PUBLIC PLANNING PROCESSES.

On 9 July 2012, in a presentation to the B.C. government's Special Committee on Timber Supply (Appendix 4), CANFOR President and CEO Don Kayne stated, in part, that "CANFOR does not support actions that would overturn landscape objectives set through public planning processes unless there is full public consultation and support." On 16 July 2012, Mr. Kayne published a similar assertion in the Vancouver Sun (Appendix 5). On the earlier of these two occasions, he stressed that this commitment formed part of CANFOR's social license. To the best of our knowledge, Mr. Kayne, who remains President and CEO of CANFOR, has not withdrawn this claim.

As mentioned, the main point of contention between the Upper Clearwater Referral Group and CANFOR Vavenby concerned CANFOR's unwillingness to abide by the terms of the 1999 *Guiding*

Principles agreement with FLNRO. It was in the hope of resolving this that the Referral Group and FLNRO agreed to engage with CANFOR in an Information Exchange Process between November 2015 and June 2016.

However, by the fifth meeting of the Information Exchange Process, it had become clear to members of the Referral Group that CANFOR's position vis-à-vis the *Guiding Principles* had not greatly changed since CANFOR first announced its logging plans in 2012 - and was furthermore unlikely to change. Accordingly, the Referral Group agreed to share with valley residents CANFOR's final logging plans for the eastern side of the Upper Clearwater Valley. At a public meeting held on 27 May 2016, local residents voted by ballot on the following proposition: "*CANFOR's logging plans respect the intent of the Upper Clearwater Guiding Principles.*" All 44 local residents who voted felt that CANFOR's latest logging plans did *not* respect the intent of the *Guiding Principles*.

On 16 June 2016 the Referral Group met with CANFOR and FLNRO to share this outcome. In response, RTF insisted that CANFOR's logging plans actually *were* consistent with the intent of the *Guiding Principles*, noting that CANFOR had made various accommodations. He also signalled his intention to proceed with applications for an unspecified number of clearcuts on the eastern slopes of the Upper Clearwater Valley.

It is difficult to reconcile this assertion by RTF with the fact that only two of the fifteen concerns raised by the Referral Group on behalf of valley residents during the Information Exchange Process had been meaningfully addressed, i.e., items 4 and 9 in Appendix 1. The remaining 13 concerns were either talked around or left unanswered. Six of these concerns are of particular note insofar as four of them – items 1, 3, 8 and 11 – directly contravene the Guiding Principles, while the remaining two – items 12 and 13 – place CANFOR in violation of its public commitment to its social license, as articulated by CANFOR's President and CEO Don Kayne in 2012. In summary, his actions now threaten to overturn landscape objectives set through a government-initiated public planning process – in direct contradiction to CANFOR's policy.

Interpretation: Here RTF appears to be in breach of ABCFP Bylaw 12.4.1 which specifies that members should "always conduct themselves honourably and in ways which sustain and enhance their professional integrity and the integrity of the profession as a whole."

WHEREAS 4: CANFOR DOES NOT SUPPORT ACTIONS THAT PUT IT AT ODDS WITH OBLIGATIONS OF ITS REGISTERED PROFESSIONAL FORESTERS TO UPHOLD THE PUBLIC TRUST.

On 9 July 2012, in a presentation to the B.C. government's Special Committee on Timber Supply (Appendix 4), CANFOR President and CEO Don Kayne stated, in part, that CANFOR "will not support actions that put us at odds with obligations of our registered professional foresters to uphold the public trust by managing forests sustainably." On 16 July 2012, Mr. Kayne published a similar assertion in the Vancouver Sun (Appendix 5). In the earlier of these two communications, he emphasized that this commitment formed part of CANFOR's social license. To the best of our knowledge, Mr. Kayne, who remains President and CEO of CANFOR, has not withdrawn this claim.

In light of the above commitment by Mr. Kayne, it seems reasonable to infer that RTF, supervisor of forest planning at CANFOR Vavenby, has been given considerable latitude to uphold his professional obligations as a member of ABCFP – and, further, that the egregious actions reported in this complaint were not strictly speaking a requirement of his job. Indeed, had the situation been otherwise, it is our

understanding that RTF would still required under Bylaw 11.5.6 to “refuse any assignment that creates a conflict of interest.” As things currently stand, his actions are tantamount to direct violation of CANFOR’s commitment to its social license and have stimulated considerable public censure:

- <https://www.desmog.ca/2017/04/03/b-c-liberals-grant-major-political-donor-permission-log-endangered-caribou-habitat>
- <https://www.facebook.com/CanadiansforCaribou/videos/200454553799070/>
- <https://www.facebook.com/CanadiansforCaribou/videos/215201935657665/>

Interpretation: Here RTF appears to be in breach of ABCFP Code of Ethics 3.2, “to uphold professional principles above the demands of employment.”

IV: THEREFORE ...

According to Section 22.1 (b) of the Foresters Act, “a person may make a complaint to the registrar if the person believes that a member has engaged in conduct unbecoming a member.” Here we call attention to various actions and decisions of RTF with respect to his professional obligations to the ABCFP. For convenience, our allegations can be grouped under four headings, namely:

- (1) an obligation to uphold professional reliance under FRPA (item 1 above)
- (2) an obligation to endangered species (item 2 above)
- (3) an obligation to public planning process (items 4 and 6, above)
- (4) an obligation with regard to the public trust (item 4 above).

We submit this complaint in the understanding that ABCFP holds its members to high ethical standards. While we acknowledge that RTF is unlikely to have signed off on all of the actions recorded here, this seems to us beside the point for two reasons. First, this complaint does not concern RTF as an employee of Canfor, but rather as a member of ABCFP. And second, CANFOR has publicly stated that many of the actions of which RTF here stands accused are in opposition to its commitment to its social contract. If it is the case that CANFOR is not living up to the terms of its social license, then RTF has a responsibility under ABCFP to make this known; but clearly he has not done so.

In support of this, we call attention to the following statement on page 14 of *Managing Species at Risk in British Columbia - Guidance for Resource Professionals*: “... where a member believes a practice is detrimental to good stewardship, the professional should promptly advise the person responsible for the detrimental practice and, if the matter is not resolved, inform the association. The phrase ‘profoundly detrimental’ is not defined, but would likely include actions that significantly impair the sustainable management of a biological resource, threaten biological diversity or impair species at risk.”

Finally, we also note the following statement in the 2004 Forest Practices Board report referenced earlier: “Under FRPA, government clearly intends for industry to have an increased level of accountability for forest practices results and strategies, and the *Association of British Columbia Forest Professionals* has already defined a standard for management of species at risk. That association recently outlined a statement of intent that could support mountain caribou conservation. It confirmed that its members are obliged, to the extent that factors relate to forest management and are under their control, *to manage for species at risk with the aim of recovering or adequately protecting these species at a level where they are no longer at risk.* It seems likely that achievement of that obligation will require forest professionals to diligently seek out and employ low-risk approaches to forest

management in the habitats of species at risk, particularly where the population at risk is small and/or the rate of decline is rapid.” Unfortunately, RTF has done no such thing, as clearly documented at this link: <https://www.facebook.com/CanadiansforCaribou/videos/230059704171888/>

We intend to retain legal advice to guide us as the ABCFP reviews this complaint. Until that time, we have reviewed the Bylaws and Code of Ethics to ensure our complaint is merited but do not have intimate knowledge of the bylaws. Reference above to specific bylaws is not intended to limit your review of RTF 's behaviour. For example, we find the foregoing to generally reflect a breach of the bylaws in section 11.3 and 11.4 but submit this complaint on the understanding that you will consider RTF 's behaviour in the context of all relevant bylaws and standards. Generally, our complaint is that RTF breached the bylaws and code of ethics and demonstrated incompetence and misconduct.

¹At the time the *Guiding Principles* was signed into effect, the Forest Practices Code of British Columbia ACT gave the District Manager final authority to withhold cutting and road permits. That changed, however, in 2004 when the B.C. Liberal government adopted its Forest and Range Practices Act (FRPA). Under FRPA, the MoF District Manager no longer has authority to withhold cutting and road permits based on input from third party groups like the Referral Group. Instead the final authority now rests with industry itself in the form of “professional reliance.”

²Already in 2014 CANFOR had stated in the local media that “we have been working with the public through the Upper Clearwater Referral Group to design our harvesting activities in a way that is respectful of the *Guiding Principles* for forestry as they apply to this area,” adding that “there is no reason a sustainable forest sector, a healthy environment and a world-class tourism industry can’t coexist.”

³In so doing the Referral Group also followed the advice of FLNRO District Manager Rick Sommer and acted upon the recommendation the B.C. Forest Practices Board:
<https://www.bcfpb.ca/reports-publications/reports/local-planning-commitments-and-logging-near-wells-gray-park/>

⁴Meeting notes from the Information Exchange Process are available upon request.

⁵On 15 January 2016, RTF shared with members of the Referral Group the executive summary of a report titled *Wildlife Management Recommendations for Forest Planning in the Upper Clearwater Valley* by a consultant hired for this purpose. The report had been commissioned by CANFOR and is dated 25 September 2015; Appendix 3. Unfortunately, subsequent requests to examine the full report were not granted. Instead, RTF stipulated that the report could only be viewed in his Vavenby office. When a Referral Group member took up this invitation on 15 March 2017, she was both prohibited from taking photographs of the document and also strongly discouraged from taking extensive notes.

⁶Meeting notes from the Information Exchange Process are available upon request.

Appendix 1: Fifteen Concerns Raised by the Upper Clearwater Referral Group in its 2015-2016 Information Exchange Process with Canfor Vavenby Supervisor of Forestry Planning RTF

HYDROLOGICAL CONCERNS

- (1) The stipulation under the *Guiding Principles* that water quality, quantity and timing of flow of six streams that cross private property below the proposed cutblocks should be maintained within their natural range of variability.

ECONOMIC CONCERNS

- (2) The importance of recognizing that Clearwater's \$20 million tourism industry is grounded in wilderness values, which place a premium on unaltered landscapes readily disrupted by industrial logging.
- (3) The requirement under the *Guiding Principles* to avoid creating visually disruptive clearcuts in sensitive areas visible from Spahats Picnic Areas and the Green Mountain Lookout tower.
- (4) The importance of placing logging activities out of sight of trail access to prominent existing and proposed tourist features.
- (5) The importance of ensuring that logging does not detract from key features of government-supported initiatives, i.e., (1) the Buck Hill Regional Park Proposal (proposed by the Thompson-Nicola Regional District); (2) the UNESCO GeoPark Proposal (now spearheaded by the Thompson – Nicola Regional District); and (3) the World Heritage Site Proposal (now spearheaded by the Wells Gray Wilderness Society).

ENVIRONMENTAL CONCERNS

- (6) The importance of recognizing the negative impact that on-going industrial-scale logging near Wells Gray Park has had – and continues to have – on the park's declining, formally endangered Mountain Caribou.
- (7) The importance of maintaining forest structure conducive to heavy hair lichen production – again for Mountain Caribou.
- (8) The requirement under the *Guiding Principles* to maintain wildlife travel corridors, including the creation of leave strips sufficiently broad to protect against windthrow clearcut margins.
- (9) The importance of properly regenerating sites prone to Alder while at the same time avoiding herbicide use.
- (10) The need to ensure stability of soil and, in the case of volcanic hyaloclastite deposits, to avoid creating conditions conducive to landslides.
- (11) The requirement under the *Guiding Principles* to refrain from logging oldgrowth forests.

CANFOR'S SOCIAL LICENSE

- (12) CANFOR's obligation under its social license to "refrain from overturning landscape objectives set through public planning processes without full public consultation and support."
- (13) CANFOR's obligation under its social license to refrain from impacting parks or other areas that provide critical habitat for species at risk.

PROFESSIONAL RELIANCE

- (14) CANFOR's questionable use of professional reliance: (1) in hiring a biologist with little if any recognized expertise in Mountain Caribou ecology to advise on caribou management; (2) in engaging a hydrologist unwilling to acknowledge the implications of climate change on his prescriptions; and (3) in refusing to allow reasonable public access to the final wildlife and hydrology reports commissioned by CANFOR as well as to its terrain report.

LEGAL REDRESS

- (15) Concerns over the feasibility of legal recourse in the event of downstream damage to private property traceable to logging by CANFOR.

Appendix 2: Interaction between RTF and a member of the public at a Canfor open house on 19 March 2017 in Clearwater, B.C.

The following text was written by a member of the public on 19 March 2017 concerning an open house event sponsored by CANFOR on 15 March 2017. It records an interaction between her and RTF. As will be clear – and consistent with statements contained in a wildlife report commissioned by RTF from a consultant working beyond her professional competence – RTF gave no indication that he understood the legal implications flowing from the endangerment status of Wells Gray's Mountain Caribou under the federal Species at Risk Act:

Below is an account of a conversation I had on Wednesday evening, March 15, 2017, with Canfor employee RTF, Forestry Supervisor at Canfor's Vavenby office. This conversation occurred when my husband and I attended an open house event sponsored by Canfor, I believe, and was held at the Dutch Lake Community Center in Clearwater. We arrived shortly after 5:30 PM and went directly to the Canfor table.

I had downloaded & printed portions of "Recovery Strategy for Woodland Caribou...", and some maps from the concerned Clearwater citizen's group's website prior to this meeting. I wanted to show Canfor a map of critical caribou habitat identified in the upper Clearwater area in this strategy, and ask them why they were logging within the boundaries. Trophy Meadows in this park is one of my favorite hiking destinations.

There were two or three guys at the Canfor table but the one who came forward appeared to be their spokesman. He identified himself as RTF and gave me his card. He chuckled ('scoffed' might be a more accurate word...) when I showed him the map of critical caribou habitat - said this was from a federal study (implication was that there was no local input) and was not applicable - that Canfor was in no way bound by this.

He said the area marked in yellow (Type 2 Matrix habitat) on this map - on the west side of the Clearwater River - the area sort of between Spahats Creek & Moul Creek but on the opposite side of the river - had never supported caribou so was not considered by Canfor to be critical habitat. RTF was very emphatic in his insistence that Mountain caribou had never occupied the west side of the river in this area. He never did explain why logging plans were in place for the east side of the valley, other than his dismissal of the validity of the Recovery Strategy. He did say that Canfor had hired their own independent third-party specialists, including wildlife specialists, to do a study on this area.

I asked RTF for a copy of the report, assuming it would be available for public perusal. RTF said this was 'sensitive information' and could not leave the office, but that if I wished to attend their Vavenby office I would be shown the reports. I was disappointed - I had assumed that all relevant information would be made available to the public at this event. We live a fair distance out of Barriere, and a trip to Vavenby for the sole purpose of being possibly allowed to read a document would be inconvenient, to say the least.

I was rather taken aback by RTF's offhand dismissal of the Recovery Strategy. I had assumed a report done under the federal "Species at Risk" Act would bear considerable weight. I could not comment on the caribou habitat as I am a relative newcomer to these issues, but it seems to me that if numbers have declined so markedly in the past 15 years, there must be areas no longer

occupied by caribou that once were in the past. And if there is to be any hope of recovery, these areas must be preserved for future populations.

Appendix 3: Wildlife Management Recommendations for Forest Planning in the Upper Clearwater Valley – a report to CANFOR

Executive Summary

“The Upper Clearwater Valley is adjacent to Wells Gray Park and is designated a Resource Management Zone (RMZ) under the Kamloops Land and Resource Management Plan (KLRMP). As Part of an integrated forest development plan for the ESSFwc2 and ICHmk2 in the valley, wildlife Species At Risk (SAR) were assessed for habitat requirements and conservation management recommendations.

“In particular, habitat for the Endangered Mountain Caribou is of greatest concern for the potential effects of forest management. Habitat in the ESSFwc2 adjacent to the boundary of Wells Gray Park has been identified as Non-Core status by the KLRMP Mountain Caribou Sub-Committee and as highly suitable and capable by BC Ministry of Environment. As such, the high-quality habitat area is considered to be infrequently occupied by caribou as of 2006. However, since then, Ministry of Environment has confirmed that Mountain Caribou have not occupied the Upper Clearwater Valley or the adjacent southern portion of Wells Gray Park in recent years. The 2014 National Recovery Strategy for Mountain Caribou has identified reducing predator density as a population recovery objective to facilitate range expansion in the Southern Group of caribou that historically occupied the area.

“As an RMZ under the KLRMP, integrated forest management is identified as an economic activity appropriate for the Upper Clearwater Valley. As a result, Canfor is developing forest management plans for the part of the area and integrating Mountain Caribou landscape and stand level habitat needs to address population recovery objectives.

“The ICHmk2 is comprised of mature mixed stands and can be characterized as an NDT3 ecosystem, with frequent fire return (150 years). The ESSFwc2 is comprised of old, climax spruce-balsam forest in the NDT1, which is a stand replacing, long-return fire cycle (250 years) ecosystem type. Fires have burned the ICH throughout the valley in the mid-1920s and 1890's; the ESSF was not burned.

“As a result of fire history and Mountain Caribou habitat use patterns, a forest management plan has been developed specifically for each of the ICH and ESSF stands. To reduce risk of wildfire, larger blocks have been recommended for the ICH which likely has not been important caribou habitat historically and currently has little suitability. Retention will target biodiversity features such as wetlands and snags. Smaller openings with patch retention, separated by retained old forest stands of similar or larger sizes, have been recommended in the ESSF. Retained intervening forest stands will provide potential movement corridors, including security features, and sustain lichen availability, should mountain Caribou numbers expand into their former range. The main silviculture objective will be to mitigate browse post-harvest in both the ICH and ESSF to avoid attracting other ungulate species and their predators, particularly wolves. Browse will be managed by opening size (ESSF) and post-harvest control (ESSF, ICH), including planting access management.”

Appendix 4: Presentation by CANFOR president and CEO Don Kayne to the B.C. government's Special Committee on Timber Supply on behalf of CANFOR, 12 July 2012.

Appendix 5: Letter to the editor by CANFOR president and CEO Don Kayne, published in the Vancouver Sun, 16 July 2012.