MOSAIC
FOREST MANAGEMENT

March 16, 2022

**To:**

**David Broadland**
**Leslie Campbell**
**Ralph Keller**
**Lannie Keller**

Please see the information below provided in response to your concerns with the proposed Quadra-Quinsam Forest Stewardship Plan (FSP) replacement (letter dated February 9, 2022). Please note that our responses are limited to comments directly related to the proposed FSP and/or under Mosaic's control.

**(1) Mosaic Forest Management meets obligations on TFL 47 in SMZ 19**

As per the FSP, "prior to the completion of the landscape unit planning process TimberWest remains committed to not harvesting any old growth, other than that absolutely required for road construction or safety, until Old Growth Management Areas (OGMAs) are established. Subsequent to the completion of landscape unit planning and establishment of OGMAs in the Quadra landscape unit the holder of this FSP will conduct Primary Forest Activities consistent with that plan." Mosaic does not harvest old forest on Quadra Island, as defined by the NSOG Order.

The 'recommended' seral stage distribution for Natural Disturbance Type 2 (% of forested area within the landscape unit) is obtained from the Biodiversity Guidebook and copied below for reference:

| Biogeoclimatic Zone | Seral Stage (Intermediate Biodiversity Emphasis Option) | | |
|---|---|---|---|
| | Early (<40 yr) | Mature + Old (>80 yr) [a] | Old (>250 yr) |
| CWH | <36 | >34 | >9 |

*(a) The minimum requirement for the old seral stage is included in the 'mature + old' category.*

A recent analysis (February 2022) of Special Management Zone (SMZ) 19 found that 43% of the forested area in TFL 47 is old (>250 years) or mature (>80 years). When including the contribution of the woodlots within the SMZ the total percentage of old or mature increases to 51%. The current amount of old / mature exceeds the 'target' range of one quarter to one third. Additionally, when considering the contribution of the parks created within SMZ 19 the total percentage of old or mature increases to 60%.

The February 2022 analysis also produced a current age class distribution of the forested area in TFL 47 within SMZ 19 (table below). It is worth highlighting that much of Quadra Island and what is now designated as SMZ 19 was burned in a series of wildfires, the largest occurring in 1925. You can find historic wildfire information on iMap BC (http://maps.gov.bc.ca/ess/hm/imap4m/). This

**CAMPBELL RIVER OFFICE**
Mosaic Forest Management

4475 North Island Highway
Campbell River, BC
Canada V9W 5C5

T 250.286.7300
F 250.286.7315

MosaicForests.com

wildfire history has resulted in 4.9% of forested area in TFL 47 being >120 years. The average age of the stands harvested in 2020 and 2021 is 90 years.

| TFL 47 in Quadra SMZ | Area (ha) | % of Forested Area |
|---|---|---|
| Age Class (years) | | |
| 0-40 | 1,426 | 20.1% |
| 41-80 | 2,598 | 36.7% |
| 81-120 | 2,711 | 38.3% |
| 121-250 | 78 | 1.1% |
| 250+ | 271 | 3.8% |

The results of the analyses done by Mosaic to ensure consistency with government objectives do not need to be indicated in the FSP. The FSP provides the results and/or strategies that the licensee intends to employ to meet government objectives. These results and/or strategies must be measurable or verifiable and therefore enforceable.

**(2) Collaboration on VILUP HLP Objective 1A**

The proposed result and/or strategy for VILUP HLP Objective 1A in the FSP is to (i) in concert with other harvesting licence holders operating in the SMZ ensure that planned development and harvesting activities will not result in the proportion of mature forest area dropping below 25% in the Forest Development Unit (FDU); and (ii) complete an analysis on an annual basis to ensure that planned development and harvesting activities will not result in the proportion of mature forest area dropping below 25% in the FDU.

This analysis referred to in (ii) combines the most up-to-date inventory information on TFL 47 with the latest information available on the government's Reporting Silviculture Updated and Land Status Tracking System (RESULTS). A summary of the recent analyses completed by Mosaic of SMZ 19 old and mature are summarized in the table below.

| Summary | Year | | |
|---|---|---|---|
| | 2018 | 2021 | 2022 |
| Percent of TFL SMZ forest area in Old or Mature | 43% | 44% | 43% |
| Percent of SMZ forest area (TFL 47 and woodlots) in Old or Mature from TFL 47 only | 27% | 28% | 28% |
| Percent of SMZ forest area (TFL 47 and woodlots) in Old or Mature from TFL 47 and woodlots | 51% | 51% | 51% |
| Percent of SMZ forest area plus Park forest area (TFL 47, woodlots and adjacent parks) in Old or Mature | 60% | 60% | 60% |

The percent of TFL 47 SMZ 19 forested area in Old and Mature is forecast to be 41% in 2027, if the current 5-yr harvest plan was completed.

**(3) Old Forest**

The Old Growth Strategic Review and Technical Advisory Panel recommendations for old growth deferrals are in the hands of the B.C. government and First Nations (G2G). The B.C. government has said they are not seeking deferrals in the recruitment area. Mosaic will follow direction from G2G.

Block 12-650

Mosaic applies the VILUP criteria for determining Old Growth in SMZ 19. However, in the case of block 12-650 we did evaluate the stand against the Great Bear Rainforest Order (GBRO) criteria for Old Forest. Block 12-650 would not have been classified as Old Forest.

**(4) SMZ 19 Primary Objectives**

Special Wildlife Management / Block 12-19H

The following information is provided specific to CDC Occurrence ID 13851 (Northern Goshawk nest site). The nest (GRANBAY1) was first identified in the fall of 2015 by an engineering contractor working for TimberWest. It was considered to be a partially functional nest under the accepted standardized goshawk nest condition rating system established by Strategic Resource Solutions (SRS). Monitoring follows accepted standardized protocols based on the best available science (McClaren et al 2015, Science-Based Guidelines for Managing Northern Goshawk Breeding Areas in Coastal British Columbia) and consists of two breeding season call playback surveys with alternate nest searches. One survey is conducted within the nestling period and the second is conducted during the fledgling period. At least one surveyor, if not both surveyors, for each survey is an 'experienced goshawk surveyor' as defined in the science-based guidelines (McClaren et al 2015).

Mosaic has monitored the area for goshawk activity annually from 2016 to 2021. No goshawks were detected during the annual monitoring in 2016, 2017 or 2018. However, during the first survey of 2016 the remains of a northern goshawk was found in the forest between Granite Bay Road and the Open Bay Main. The remains had moss growing in the clumps of flight feathers, likely an indication of mortality some months prior (i.e. fall or winter). The nest condition was observed to deteriorate over the 2016-2018 period from partially functional to poorly functional, bordering on non-viable.

In 2019 the nest was noted to have totally fallen from the nest platform (non-viable). During the 2020 and 2021 monitoring the nest tree was checked for

possible rebuilding but the crook deformity where the nest had been remains bare. No goshawks or evidence of goshawk activity was noted in 2020 or 2021.

CDC Occurrence ID 81876

Occurrence data obtained from the Conservation Data Centre states "this high bench floodplain forest occurrence is based on Sensitive Ecosystems Inventory (SEI) and it is mapped as young forest. A field sample records young forest composed of red alder (*Alnus rubra*) and Sitka spruce (*Picea sitchensis*) trees on a floodplain bench with back channels. This ecological community occupies approximately 5.26 ha or 12.90% of the area shown."

This occurrence is located on Quadra Island, on the floodplain of McKercher Creek where it flows into Hyacinthe Bay. The majority of the mapped occurrence is outside of TFL 47 and/or adjacent to previously constructed Hyacinthe Bay Road or Walcan Road. Mosaic met with the Quadra Island Salmon Enhancement Society (QISES) on March 2, 2022 to collaborate on an assessment of the hydrological functions of the Hyacinthe Creek watershed supported by science. Any future operational plans will include and be guided by this assessment.

**Summary**

Mosaic Forest Management (Mosaic) must prepare an FSP that is consistent with currently approved regulations and land use plans. The Forest Planning and Practices Regulation (FPPR) outlines the content requirements of an FSP. The FSP ensures that forest practice operations are consistent with B.C. government objectives. The FSP can be amended from time to time in following amendments to regulation and land use plans.

The Quadra and Quinsam FSP will only remain in effect until there is a Forest Landscape Plan(s) established for the Quadra and Quinsam areas. Priorities for Forest Landscape Planning are in the hands of the B.C. government and First Nations (G2G).

Sincerely,

REGISTERED PROFESSIONAL FORESTER
PROVINCE OF BRITISH COLUMBIA
Jennifer M. Peschko

Jennifer Peschke, RPF
Area Forester
Mosaic Forest Management