

# First Nations Wildcrafters BC Comments re:

Western Forest Products  
DRAFT  
Pest Management Plan for Forest Vegetation Management  
Plan number #: PMP4 - 2014-2019



Prepared: February 4, 2014

Prepared for:  
Kindry Mercer  
Novafor Forest Services, Ltd

Prepared by:  
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First Nations Wildcrafters BC



## **Introduction**

First Nations Wildcrafters BC (FNW) is honored to have been provided the opportunity to review and provide comment on the Western Forest Products DRAFT Pest Management Plan for Forest Vegetation Management Plan number #: PMP4 - 2014-2019.

This written comment is being provided to Kindry Mercer Novafor Forest Services, Ltd following an in-depth phone review conducted on February 4, 2014. This FNW comment document is also being sent to Erin Badesso, Western Forest Products.

FNW is submitting these comments solely in the capacity of a stakeholder business and expertise. FNW is not submitting this document or discussion relating to this WFP Draft Plan in a representative capacity of any First Nation, organization or community. FNW is solely responsible for the comments contained in this document and in the phone discussion.

Please feel free to distribute this document and to contact us should we be able to be of more assistance.

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**FNW Comments Table:**

<i><b>FNW Comment Number</b></i>	<i><b>WFP Draft Plan Reference</b></i>	<i><b>FNW Comment</b></i>
1	Page 2: PFZ: pesticide free zone: a strip of land adjacent to a stream, lake or wetland where no pesticides are permitted.	This definition may be need to be amended to include areas identified in Section <u>Human Food Sources</u> on page 25
2	Page 7: <u>Description of Problem Vegetation</u>	<p>Some of these target species are also cultural heritage resources and/or known to be non-timber forest resources/products.</p> <p>It is suggested that a “qualifier” statement be included in this section to remove these potential conflicts of CHR/NTFR management objectives.</p> <p>Something similar to recommendations below regarding Human Food Sources may be considered. Consistency between these two sections would be helpful.</p>
3	<p>Page 5: <u>Human Food Sources</u></p> <p>Naturally occurring food suitable for human consumption is an important resource within the plan area. Potential food resources include berries, mushrooms and medicinal plants. The strategies that will be applied to protect each of these resources from pesticide use are outlined below.</p> <p>Known berry-picking areas will be established by consulting with First Nations,</p>	<ol style="list-style-type: none"> <li>1. This Section includes identification of Cultural Heritage Resources (as well as non-timber forest resources/products).</li> <li>2. In addition to the CHR values identified, the use of an area may also</li> </ol>



	<p>and will be protected by establishing treatment buffers and/or modifying treatment dates. Signs will be posted at the time of treatment, as per the IPM Regulation, and will be left in place for at least 14 days.</p> <p>At present there are no known areas used for medicinal plants; therefore, no specific strategies are in place regarding their protection.</p> <p>There are no other known locations for human food collection.</p>	<p>be of a spiritual or prayer value that would be appropriate for a PFZ (or buffer mitigation strategy depending upon site specific factors).</p> <p>3. Inclusion in this section of the integration of Traditional Knowledge (TK) in decision making as an equitable knowledge system in making this determination would be necessary to insure CHR objectives are met. (This may require some modification of Treatment Selection page 12 to include TK when addressing species identified as CHR/NTFR).</p> <p>4. For consistency with other Forest Plans (i.e., FSPs, CSA certification indicators) is suggested that this section heading include CHR and NTFR/NTFP.</p> <p>5. FNW acknowledges that retaining Human</p>
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4	<p>Page 27 <u>Retention of Red Alder</u></p> <p>Red alder occurs naturally throughout most of the plan area. It is the primary target of the vegetation management program and pesticide treatments. In addition to being a potentially valuable crop tree, red alder also contributes to biodiversity if retained in the forest. It does so by adding nitrogen to forest sites –</p>	<p>This species is also a CHR of some First Nations. Although this section identifies biological benefits of Red Alder retention, it does not include an actual retention plan or acknowledgement of CHR, NTFR and or inclusion of TK values to</p>



	<p>nitrogen that is available as a growth enhancer for other plants and organisms. Red alder also creates gaps in the canopy of evergreen forests that allows light to reach the forest floor, which in turn results in the maintenance of light-requiring plants used by other organisms for food and cover.</p>	<p>achieve a desirable outcome of this section.</p>
5	<p>Page 28 <u>Planting of Minor Species</u></p> <p>Douglas-fir, red cedar, western hemlock and yellow cedar, plus a variety of minor species are included in planting programs throughout the plan area. The latter include mountain hemlock, western white pine and Sitka spruce.</p>	<p>There are other species that may be of value to use for restoration purposes that would assist in meeting other objectives, such as CHR and/or Non-timber.</p> <p>Inclusion of TK and other management objectives as potential species candidate in this section would provide flexibility and ability to potentially meet multiple objectives on a site by site basis.</p>
6	<p>Page 32 <u>Notes</u></p> <p>Small patches or strips of high density red alder and bitter cherry may be retained for biological reasons. For example, five metre wide strips of red alder along stream banks, or 20 by 20 metre patches of bitter cherry.</p>	<p>See FNW Comments 2, 3, 4</p>

**Additional FNW Notes:**

There may be some overlap between the management indicators of the WFP CSA non-timber indicators that would provide areas to consider as PFZ. FNW does not have a spatial map of the existing infested areas and how this may overlay on the CSA road corridor NTFR zones.

As stated, FNW is working towards establishing an initial forum in the area to explore the potentials for an Invasive Species Management Workgroup. This is anticipated to occur in spring 2014. The intent is to gather timber licensees, First Nations and First Nation community members and relevant Ministry officials to explore next steps



towards a collaborative approach to addressing Invasive Species beyond the current structures of FSP obligations.

FNW is willing to work collaboratively with WFP and other stakeholders to accomplish a longer term collaboration for the management of invasive species.

