

***The Gorman Group of Companies  
SFM and EMS Program***

**Part 1 of 3: Sustainable Forest Management Plan**

***Sustainable Forest Initiative® (SFI®)***

**2010-2014 Standard**



**The Gorman Group of Companies  
Sustainable Forest Management Plan**

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# ***The Gorman Group of Companies Sustainable Forest Management Plan***

## **INTRODUCTION: The Gorman Group of Companies**

Gorman Bros. Lumber Ltd. (GBL) ([www.gormanbros.com](http://www.gormanbros.com)) was founded by brothers Ross and John Gorman in 1951 and has operated continuously for over 60 years. The company has thrived on a philosophy of working closely with their communities to create stable, long-term, well-paying jobs, and demonstrating a high level of regard for maintaining “social license” when conducting our forest management activities.

The West Kelowna location has a current workforce of about 450 employees and contractors, and consumes over 600,000m<sup>3</sup> annually of spruce and pine logs. In conjunction with our remanufacturing facility in Oroville, Washington, we produce over 160 million board feet annually of high quality, appearance grade 1” boards for the U.S., Canadian, and overseas markets. By-products include chips and sawdust/shavings that are sold locally to pulp/paper manufacturers, and more recently into the emerging bio-energy market.

The Lumby Pole Division produces approximately 30,000 pine and cedar utility poles that are sold almost exclusively into Canadian markets. The vast majority of these poles are sourced from Crown tenures, or from large industrial private land holdings on the BC coast.

In 2011, the Gorman family acquired full ownership and control of Downie Timber Ltd. (DTL) in Revelstoke, British Columbia – [www.downietimber.com](http://www.downietimber.com). The Downie mill produces a mix of high quality cedar and Douglas-fir dimension products that are sold into the US, European and Japanese markets, as well as producing 1” spruce boards for the West Kelowna mill. Over 400,000m<sup>3</sup> of logs are consumed annually at Downie, producing roughly 140 million board feet of finished products.

In the fall of 2012, Canoe Forest Products (CFP) - [www.canoefp.com](http://www.canoefp.com) (formerly Federated Cooperatives Ltd.) located in Canoe, British Columbia was purchased. The Canoe facility produces high-grade Douglas-fir plywood that is sold into Canadian markets, consuming approximately 260,000m<sup>3</sup> annually.

The Downie and Canoe facilities employ about 350 and 250 people, respectively, and like West Kelowna, are the largest employers in their communities.

The Gorman Group of Companies (GGoC) is fully committed to responsible and sustainable forest management of the lands where operations are conducted. This Sustainable Forest Management Plan (SFMP) document describes how the principles and objectives of the **Sustainable Forestry Initiative® (SFI®)** program will be met by:

- adhering to the legal and regulatory framework governing forest management in BC,
- meeting the performance measures contained within those objectives and upholding the following 14 Principles of the **Sustainable Forestry Initiative 2010-2014 Standard** (Appendix I), and
- implementing and monitoring our operational plans through our EMS framework.

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**SFI Principles:**

1. Sustainable Forestry	8. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing
2. Forest Productivity and Health	9. Legal Compliance
3. Protection of Water Resources	10. Research
4. Protection of Biological Diversity	11. Training and Education
5. Aesthetics and Recreation	12. Public Involvement
6. Protection of Special Sites	13. Transparency
7. Responsible Fiber Sourcing Practices in North America	14. Continual Improvement

In order to meet the Principles, the following Objectives are contained within the SFI Standards:

**FOREST LAND MANAGEMENT OBJECTIVES**

- Objective 1 – Forest Management Planning
- Objective 2 – Forest Productivity
- Objective 3 – Protection and Maintenance of Water Resources
- Objective 4 – Conservation of Biological Diversity including Forests with Exceptional Conservation Value
- Objective 5 – Management of Visual Quality and Recreational Benefits
- Objective 6 – Protection of Special Sites
- Objective 7 – Efficient Use of Forest Resources

**FIBER SOURCING OBJECTIVES**

- Objective 8 – Landowner Outreach
- Objective 9 – Use of Qualified Resource and Qualified Logging Professionals
- Objective 10 – Adherence to Best Management Practices
- Objective 11 – Promote Conservation of Biological Diversity, Biodiversity Hotspots and High-Biodiversity Wilderness Areas
- Objective 12 – Avoidance of Controversial Sources including Illegal Logging
- Objective 13 – Avoidance of Controversial Sources including Fiber Sourced from Areas without Effective Social Laws

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## **Forest Land Management and Fiber Sourcing Objectives**

Objective 14 – Legal and Regulatory Compliance

Objective 15 – Forestry Research, Science, and Technology

Objective 16 – Training and Education

Objective 17 – Community Involvement in the Practice of Sustainable Forestry

Objective 18 – Public Land Management Responsibilities

Objective 19 – Communications and Public Reporting

Objective 20 – Management Review and Continual Improvement

SFI Standard land management Objectives 1-7 provide measures for evaluating conformance with the SFI 2010-2014 Standard on forest lands the Gorman Group owns or controls through long-term leases. Through these Objectives which are addressed in various forest management plans, the Principles are upheld by employing an array of economically, environmentally and socially sound practices in the conservation of forests — including appropriate protection, growth, harvest and use of those forests — using the best scientific information available.

SFI Standard fiber sourcing Objectives 8-10 provide measures for evaluating conformance of the fiber sourcing programs with the SFI 2010-2014 Standard.

SFI Standard fiber sourcing Objectives 11-13 are not included in this SFMP since they refer to fiber-sourcing outside of Canada and the United States. None of the Gorman Group of Companies source fiber outside of Canada.

SFI Standard land management and fiber sourcing Objectives 14-20 provide measures for evaluating conformance with the SFI 2010-2014 Standard for research, training, legal compliance, public and landowner involvement, management review, and continual improvement.

To support the implementation of the SFI Standard, Principles and Objectives, an single Environmental Management System (EMS) serves as the principal instrument to ensure that the SFMP is implemented, monitored and measured across all Divisions.



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## **Scope of the SFMP**

The Gorman Group of Companies operates on 6 forest tenures – 4 in the Okanagan Timber Supply Area Forest Licences (FLs) A18670, A18671, Tree Farm Licence 33 (TFL 33) and Timber Licence 635 (T0635), FL A31102 in the Revelstoke TSA, and FLA17644 in the Golden TSA. All operations occur under Forest Stewardship Plans that are 'division specific' at this time. Each FSP is a map based, landscape-level view of potential development activities that are intended to take place on the area described in the plan. Among other things, the purpose of the FSP is to:

- List applicable Objectives Set by Government (OSBG).
- Describe the measurable and/or verifiable results and/or strategies that would meet the OSBG.
- Prescribe measures specific to forest range.
- Provide an opportunity for review and an opportunity for input.

Objectives were derived from the Okanagan-Shuswap Land and Resources Plan (OSLRMP), the Revelstoke Minister's Advisory Committee (RMAC) and the Kootenay Boundary Higher Level Plan (KBHLP) which were signed off by one or more of the GGoC companies. All 3 processes (the OSLRMP, RMAC and the KBHLP) brought a wide range of interest groups together to identify resource values and management objectives for the respective Timber Supply Areas.

Operations are carried out within several Biogeoclimatic Zones including the Interior Cedar Hemlock (ICH), Interior Douglas-fir (IDF), Montane Spruce (MS) and Engelmann Subalpine Fir (ESSF). Operations range in elevation from approximately 350 metres to over 2200 metres. Species harvested include Douglas-fir, Spruce, Western Red Cedar, Western Hemlock, Balsam, Larch, and Lodgepole Pine. Harvesting is carried out by contractors with conventional ground skidding systems using feller bunchers and skidders and also by using overhead cable systems and some helicopter logging.

The Sustainable Forestry Initiative Program provides parameters (Objectives, Performance Measures, and Indicators) that are described within the SFI 2010-2014 Standard. The parameters are used to measure success in determining achievement in meeting the SFI Standard. This SFM Plan addresses those parameters contained within the SFI Standard and identifies the programs, plans and activities that support them.

The SFI Program is overseen by the Sustainable Forestry Board (SFB), which is an independent board responsible for maintaining and enhancing the SFI Standard certification procedures. The SFB contains members from conservation and environmental organizations, regulatory agencies, professional forestry organizations, logging professionals and landowners. For more information on the Sustainable Forestry Initiative, visit the SFI website at: <http://www.sfiprogram.org/>.

The SFMP covers operations on the company-owned, crown-issued forest tenures:

- Quota volume from the associated land base of Forest License A31102 in the Revelstoke Timber Supply Area (TSA) and Forest License A17644 in the Golden

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Forest TSA directly managed by the Woodlands Department of Downie Timber Ltd.

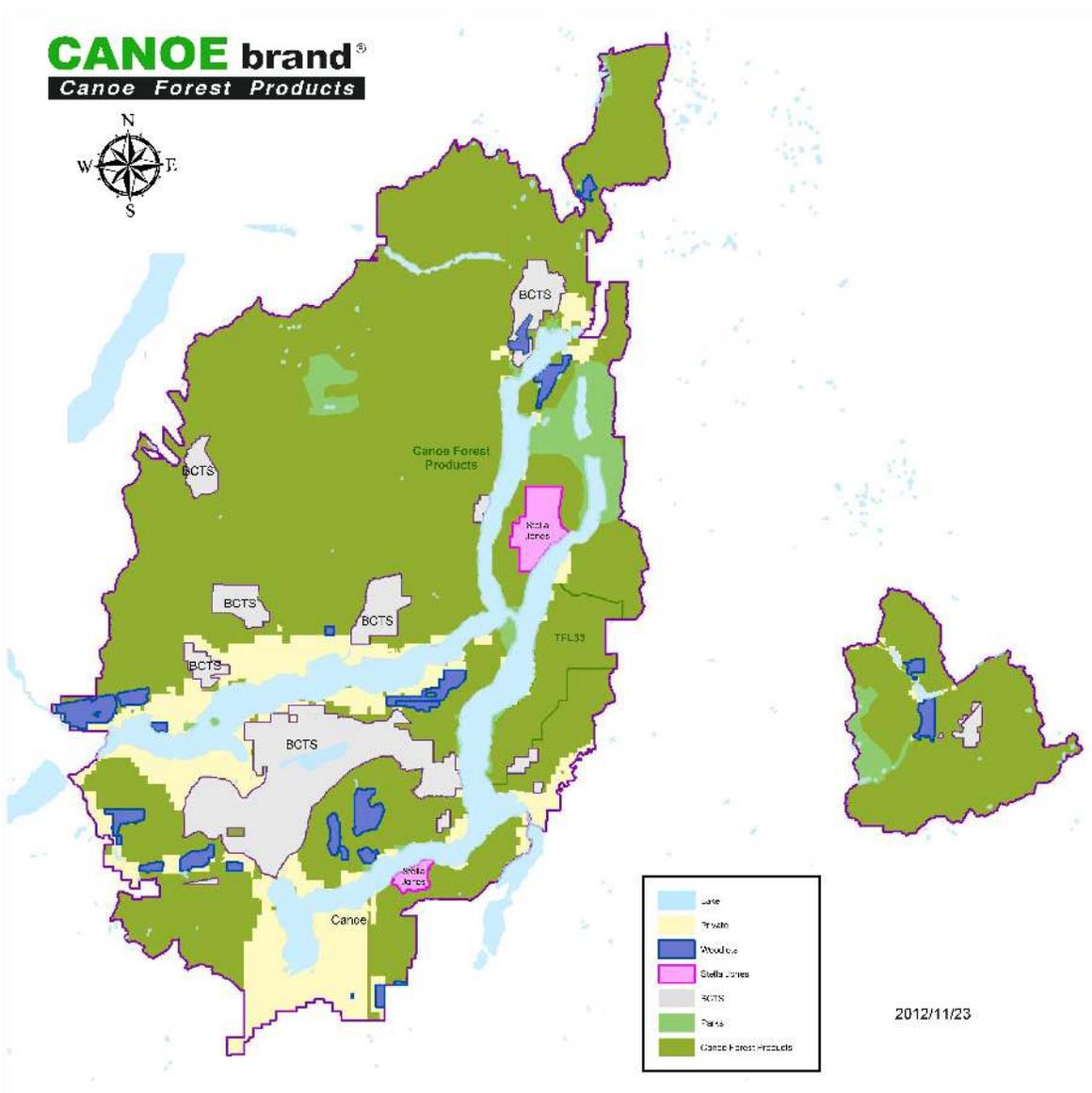
- Quota volume from the associated land base of Forest License A18670 in the Okanagan Timber Supply Area (TSA), TFL 33 and TO635 managed by the Woodlands Department of Canoe Forest Products Ltd.
- Quota volume from the associated land base of Forest License A18671 in the Okanagan Timber Supply Area (TSA) managed by the Woodlands Department of Gorman Bros. Lumber Ltd.

The SFMP is limited to the forest management activities completed on the crown issued tenures performed by Woodlands Department employees, consultants and contractors, as well as the Log Procurement Programs at each Company.

The range of activities includes forest development and planning including lay-out, assessments and surveys, road construction, maintenance and deactivation, harvesting and post harvest activities including site preparation, in-block deactivation, planting and brushing.

Woodland activities end at the log dump / scale site and do not include the log yard, booming grounds, tugs, or sawmill/veneer facilities.

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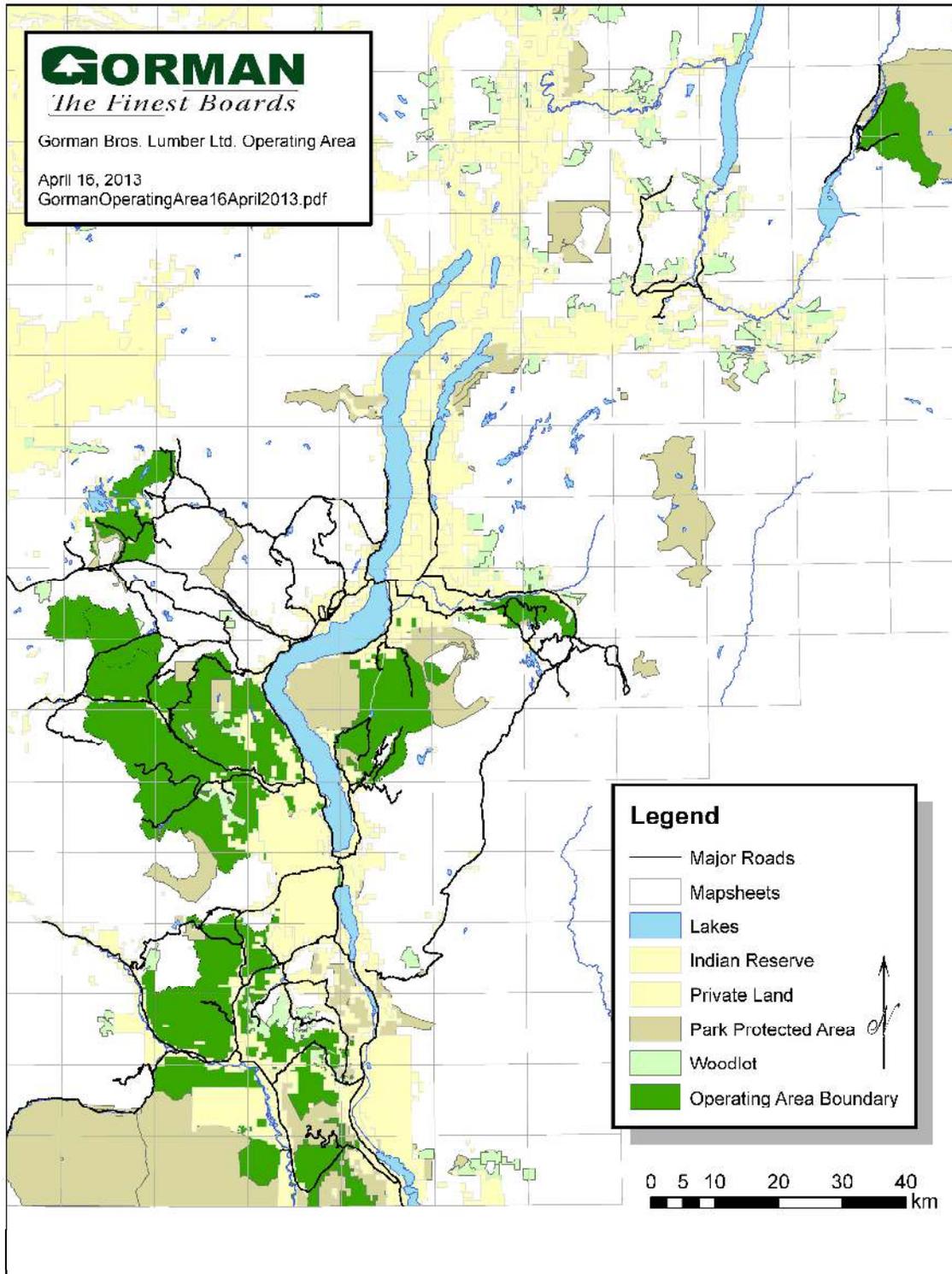


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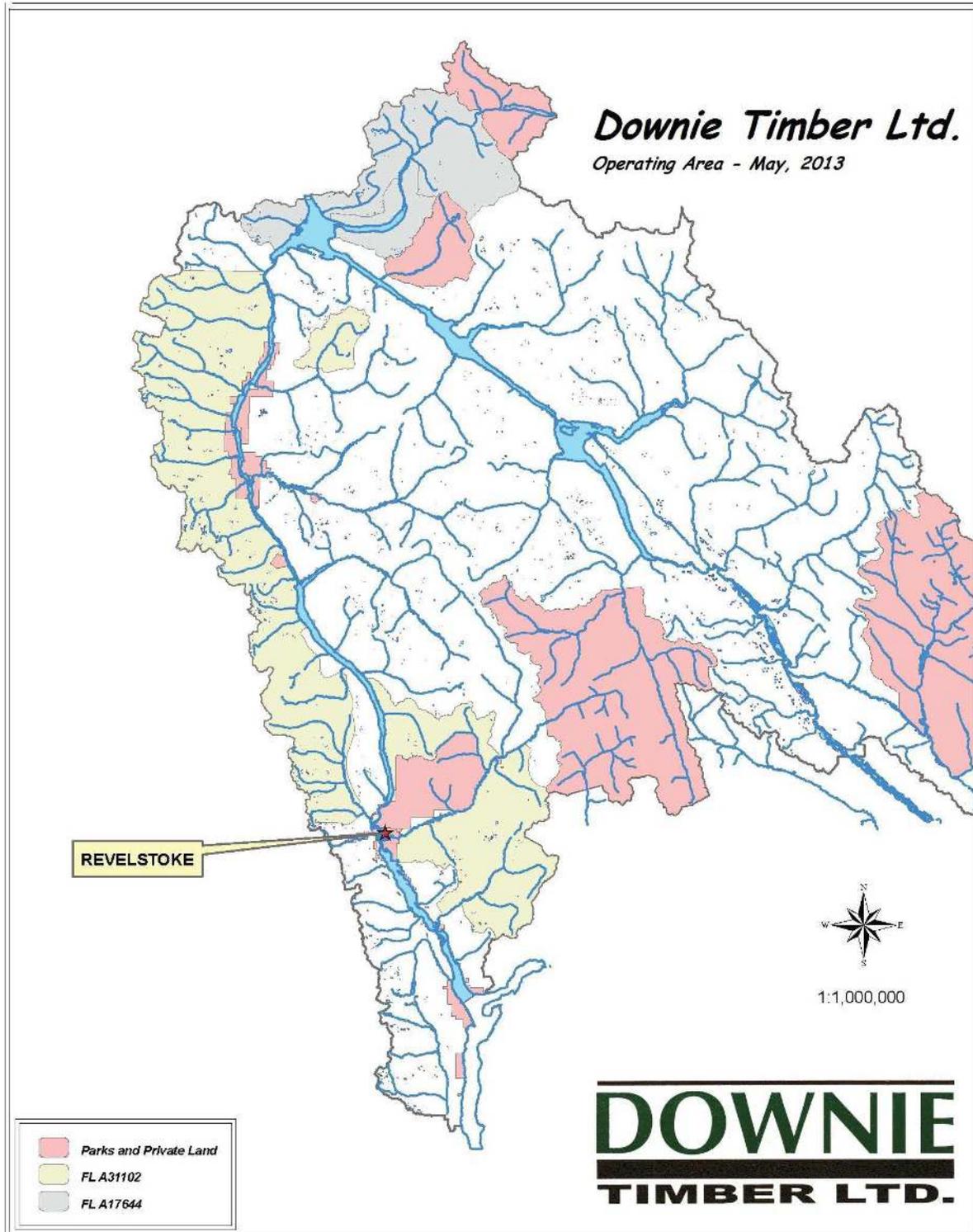
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## SFIS OBJECTIVES FOR LAND MANAGEMENT

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## OBJECTIVE 1. FOREST MANAGEMENT PLANNING.

To broaden the implementation of sustainable forestry by ensuring *long-term* forest productivity and yield based on the use of the *best scientific information* available.

### Performance Measure 1.1.

*Program Participants* shall ensure that forest management plans include *long-term* harvest levels that are sustainable and consistent with appropriate *growth-and-yield models*.

**Indicator 1a & b:** *Forest management planning at a level appropriate to the size and scale of the operation, including:*

- a. *a long-term resources analysis;*
- b. *a periodic or ongoing forest inventory;*

A long-term resource analysis is fulfilled by the higher level land use plans and Forest Stewardship Plans. The Revelstoke Minister's Advisory Committee (RMAC) plan and the Kootenay Boundary Higher Level Plan (KBHLP) cover DTL's operating areas and the Okanagan Shuswap Land and Resource Management Plan (OSLRMP) applies to CFP and GBL's operating areas. For TFL 33, Management Plan #9 applies. Various maps/reports for forest and other resource values (i.e. fish inventory, AOA's, water intakes, wildlife habitat areas etc.) are retained at the relevant office in hard copy and/or digital (GIS) format.

Timber Supply Reviews (TSRs) by Timber Supply Area (TSA) include the Okanagan TSA, Revelstoke TSA, Golden TSA and TFL 33 which are carried out every five to ten years. The TSR ensures that long-term harvest levels are sustainable and consistent with the appropriate *growth-and-yield models, social and environmental considerations, and various land use / land management plans.*

Long term harvest levels are calculated through the Timber Supply Review (TSR) process for the above management units. The Chief Forester determines the current Allowable Annual Cut (AAC) through the TSR process. The TSR incorporates the forest inventory and growth and yield data in conjunction with social and environmental factors. Other inventory inputs include terrain mapping, growth and yield modeling, forest health factors, silviculture treatments and other activities that affect the long-term harvest levels.

The Okanagan TSA has a Vegetation Resource Inventory (VRI) that was completed in 2010. by the Okanagan Innovative Forestry Society (OIFS) under an Innovative Forest Practices Agreement (IFPA). TFL 33 has its own forest cover inventory that is maintained by Canoe Forest Products. In the Revelstoke TSA and Golden TSAs, VRIs were completed in 2009 and 2011, respectively. Forest Inventory information is maintained by the MFLNRO.

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**Indicator 1c & d:** Forest management planning at a level appropriate to the size and scale of the operation, including:

- c. a land classification system;
- d. soils inventory and maps, where available

The Biogeoclimatic Ecosystem Classification (BEC) system is used in conjunction with the Vegetation Resource Inventories (VRI) to classify forestlands. BEC classifies the ecosystems based on categories of climate, soil, and vegetation. This classification system was developed in British Columbia and is widely used as a framework for resource management as well as for scientific research.

Soils information is part of the BEC classification system as noted above. Soil stability mapping (terrain stability mapping) has been completed for the majority of the operating areas. Site-specific, field-level soils information is gathered on all harvest areas and road corridors at the Site Plan (SP) stage of harvest planning.

**Indicator 1e:** Forest management planning at a level appropriate to the size and scale of the operation, including access to growth-and-yield modeling capabilities.

MFLNRO approved growth and yield models (VDYP, TIPSYP etc.) are used within the TSR processes to estimate future volumes from forest stands.

**Indicator 1f:** Forest management planning at a level appropriate to the size and scale of the operation, including up-to-date maps or a geographic information system (GIS).

The BC Government LRDW site provides mapping and resource information for strategic forest planning through in-house GIS systems. TRIM, VRI, orthophotos, resource values data etc. are also utilized for forest planning purposes.

**Indicator 1g:** Forest management planning at a level appropriate to the size and scale of the operation, including recommended sustainable harvest levels for areas available for harvest.

The Chief Forester determines the Allowable Annual Cut (AAC) every 5-10 years, as described above. The AAC determination includes a timber supply analysis, social-economic analysis, public discussion paper, summary of public input and a rationale statement.

The objectives of this analysis include:

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- identifying relevant current forest management practices and assessing their effects on short and long term timber supply;
- identifying related economic, environmental and social factors;
- identifying where improved information is required for future forecasts; and
- for interested parties to provide the Chief Forester (CF) with information to adjust the AAC.

The CF determines the AAC for each management unit in the *Rationale for AAC Determination*. The MFLNRO then allocates portions of the AACs to specific forest tenures through an apportionment and disposition process.

License holders develop specific harvest plans within their respective operating areas in a manner that are consistent with the TSR and local issues / resources such as watersheds, wildlife habitat, visual quality, etc.

**Indicator 1h:** *Forest management planning at a level appropriate to the size and scale of the operation, including a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy, feedstock production or biological diversity conservation, or to address climate-induced ecosystem change).*

Non-timber values are accounted for in the TSR where deductions are made to the land base for set-aside areas such as Parks and Biodiversity in the form of Old Growth Management Areas (OGMA's). Non-timber values such as ungulate winter range and visual quality objectives are accounted for in the analysis. These values are drawn from the OSLRMP, RMAC and KBHLP.

The Gorman Group participates in various projects to produce and provide the best information available for the TSRs applicable to the forest tenures, including forest inventory and growth (See Forestry Research, Science and Technology). CFP also leads projects and supplies the information directly for the TSR for TFL 33.

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**Indicator 2:** *Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities.*

Annual harvests are tracked through the government harvest billing system (HBS) and MFLNRO cut control statements. Annual allowable cut (AAC) is reconciled annually and must meet the 5-year cut control limits. Harvesting in excess of the legislated allowance results in a decreased harvest rate in the next 5-year period.

**Indicator 3:** *A forest inventory system and a method to calculate growth.*

The forest inventories that apply to forest tenures consist of Provincial government *Vegetation Resource Inventories* (VRI). The VRI is updated periodically as determined by the MFLNRO. Forest growth is accounted for by the use of forest growth models (currently VDYP and TIPSy) that “grow” managed and unmanaged stands electronically based on long-term permanent sample plot (PSP) data.

**Indicator 4:** *Periodic updates of inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases (e.g., improved data, long-term drought, fertilization, climate change, forest land ownership changes, etc).*

Forest updates for operational activities (harvesting, planting, free growing, etc.) are reported electronically to the MFLNRO through the RESULTS application (**R**eporting

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Silviculture Updates and Land Status Tracking System). There is both a spatial and tabular component to the submissions.

Other depletions (fires, insects, and disease) are accommodated by periodic updates of the forest cover conducted by the MFLNRO.

CFP manages the inventory data base for TFL 33 through an Arc Info Geographic Information System (GIS). The updates are used in the TSR as part of the current inventory. Cutblock level data is input into an internal data management system PhoenixPro that provides the basis for RESULTS submissions.

Planned harvest levels are determined as described above.

**Indicator 5:** Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans

Forest practices are confirmed at the site level through documented planting inspections and silviculture surveys that are tracked through the PhoenixPro activity tracking system and reported to government through the RESULTS database.

Documents related to forest practices are kept on file in the appropriate Woodlands office. Major milestones (at post-harvest, regeneration, and free-growing) are reported through the RESULTS system.

### Supporting Information and Records

TFL 33 – Management Plan #9, TSR, TSR Information Package

Data Management - RESULTS, PhoenixPro, ArcInfo GIS, ArcView

Okanagan TSA TSR, Revelstoke TSA TSR, Golden TSA TSR, OIFS TSR, MFLNRO Annual Cut Control Statements

## OBJECTIVE 2. FOREST PRODUCTIVITY.

To ensure *long-term* forest *productivity*, carbon storage, and *conservation* of forest resources through prompt *reforestation*, soil *conservation*, *afforestation* and other measures.

### Performance measure 2.1.

*Program Participants shall promptly reforest after final harvest.*

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**Indicator 1:** Designation of all harvest areas for either natural regeneration or by planting.

All harvest areas are designated for either natural or artificial regeneration based on site level ecological information. Stocking standards are assigned for each cut block by a Registered Professional Forester (RPF) from the appropriate government-approved Forest Stewardship Plan. Stocking standards adhere to legislated requirements (FRPA) and include ecologically appropriate species for the site series and site condition.

Legislated reporting dates are affixed in the stocking standards for Regeneration Delay and Free Growing Date.



**Indicator 2:** Reforestation, unless delayed for site specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years.

Artificial regeneration (planting) occurs within two years of harvest completion, unless delayed for site-specific environmental or forest health considerations. Natural regeneration methods target full reforestation within five years of harvest. Reforestation

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levels are confirmed through silviculture surveys, compliance records and field evidence. Provincial laws (i.e. FRPA), regulations and relevant guidelines provide the framework for reforestation practices and parameters.

**Indicator 3:** *Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for both artificial and natural regeneration.*

Regeneration progress towards meeting free growing standards is monitored through surveys that assess stocking, species composition, survival, growth and competition. Where plantation stocking and/or performance is unacceptable, treatments are carried out to meet the stocking standard requirements. Survey information is tracked in a data management system (PhoenixPro), and milestone dates (Regeneration, Free Growing) are reported through RESULTS.

**Indicator 4:** *Minimized planting of exotic tree species, and research documentation that exotic tree species, planted operationally, pose minimal risk.*

Exotic species are not utilized in reforestation, nor are they contained in any of the Forest Stewardship Plans.

**Indicator 5:** *Protection of desirable or planned advanced natural regeneration during harvest.*

Desirable advanced regeneration (ecologically suitable species) and some of the deciduous component are protected during harvesting and post-harvest treatment to the extent practical. The amount of advanced regeneration retained will depend on its quantity and quality as well as the harvest system (ie, ground based, cable or aerial).

The Site Plan (SP), signed by an RPF, describes the criteria for the retention of advanced regeneration, which is then carried over to the Logging Plan. Harvest inspections document the level of compliance with Site Plan – ie, the extent to which advanced natural regeneration and deciduous species were protected.

**Indicator 6:** *Planting programs that consider potential ecological impacts of a different species or species mix from that which was harvested.*

Site Plans and planting prescriptions developed by RPFs are based on site level ecological information (BEC), and adhere to the stocking standards identified in the applicable Forest Stewardship Plans.

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**Indicator 7:** *Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes.*

Afforestation is not practiced.

### **Performance measure 2.2.**

*Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats.*

*Chemical applications are a viable tool in meeting Free Growing obligations.*

*DTL's operating area is located in British Columbia's Interior Wet Belt Zone which has very productive growing sites but also brush competition challenges.*

*GBL has specific sites where chemical brushing is the most effective treatment option.*

*Both DTL and GBL utilize chemical brushing to a limited extent within both their operations.*

*CFP does not apply herbicides or pesticides to reduce brush competition.*

**Indicator 1:** *Minimized chemical use required to achieve management objectives.*

Within the range of treatment options available for post-harvest treatments to address competition (ie. mechanical brushing, chemical spraying, seedling selection etc.), the preference is to employ mechanical brushing or other non-chemical means. However, where necessary, and where permitted by land-use plans and site level analysis, chemical use may be the most effective treatment.

Fertilizer application is restricted to the use of tea-bag fertilizer packets during planting / reforestation activities on selected sites within the Downie operations. No broadcast fertilizer applications are conducted.

Government approved Pest Management Plans (PMPs) specify the standards and requirements applicable when prescribing chemical applications. Detailed prescriptions are developed by qualified professionals and are consistent with the PMP.

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**Indicator 2:** *Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.*

The PMPs are reviewed by the Ministry of Environment and are consistent with the statutes and regulations such as the Pesticide Control Act. The PMP specifies which chemicals are permissible for application.

The PMP incorporates information from an Integrated Pest Management (IPM) Program that monitors the effectiveness of chemical application based upon biological, physical and cultural impacts on it's effectiveness at meeting specified management objectives.

**Indicator 3:** *Use of pesticides registered for the intended use and applied in accordance with label requirements.*

The PMP specifies those chemicals that are permitted and approved for use by the Ministry of Environment.

**Indicator 4:** *Use of integrated pest management where feasible.*

A site level assessment is conducted to determine which brush control measure will be effective at achieving specified forest management objectives. The PMP specifies management practices and procedures by distinct operating zones. Each operating zone has different management objectives based upon site level characteristics such as proximity to riparian areas, fish habitat and community water supply areas.

**Indicator 5:** *Supervision of forest chemical applications by state-or provincial-trained or certified applicators.*

The PMP specifies those individuals who are certified / authorized to develop, implement and supervise chemical spraying operations. The Environmental Management System (EMS) states the policies, programs and plans pertaining to pesticide use, including evaluations of the effectiveness of the PMP and on-going training and supervision requirements.

**Indicator 6:** *Use of management practices appropriate to the situation.*

Management practices are outlined above. Additional, site specific information is contained in the Site Prescriptions, and PMP.

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### **Performance Measure 2.3.**

*Program Participants shall implement management practices to protect and maintain forest and soil productivity.*

**Indicator 1:** *Use of soil maps where available.*

Terrain mapping, where available, identifies potentially unstable and unstable terrain. For proposed roads and/or cutblocks located in mapped unstable and potentially unstable terrain polygons, a site level inspection is performed by a qualified professional, and the recommendations are incorporated into operational plans. Field observations at the site level are collected on all roads and cutblocks during plan preparation.

**Indicator 2:** *Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.*

Field-based soil classifications to identify soils that are vulnerable to compaction are conducted by qualified Forest Professionals, who also make recommendations regarding the management and avoidance of vulnerable soils.

**Indicator 3:** *Use of erosion control measures to minimize the loss of soil and site productivity.*

Erosion control measures (i.e., road construction and maintenance programs, slide rehab, grass seeding) are consistent with the practice requirements for soil conservation contained within the FPPR and the results/strategies of the FSP. Operational plans contain site specific measures, including shutdown criteria specified in the EMS. Where beneficial, erosion control techniques are employed while constructing or deactivating roads, e.g., silt fencing and hay bales etc.

**Indicator 4:** *Post harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).*

Site and operational plans prescribe operations in a manner intended to maintain site productivity are developed prior to harvest. Inspections during operations monitor soil impacts, while post-harvest inspections are conducted on all harvest areas to confirm site plan requirements have been met.

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**Indicator 5:** *Retention of vigorous trees during partial harvesting consistent with scientific silvicultural standards for the area.*

Where partial harvesting is employed, vigorous trees are retained to the extent practical according to the operational plans that contain cutting and retention criteria. Inspections during operations monitor required retention levels, while post-harvest inspections conducted on harvest areas confirm site plan requirements have been achieved.

**Indicator 6:** *Criteria that address harvesting and site preparation to protect soil productivity.*

Soil disturbance limits are prescribed in the FSP, while sensitive soils are identified in the site plans. Soil conservation measures are prescribed in the specific Site Plan and/or Logging Plan. These measures could include restrictions on timing of operations, season of operation, cable versus ground skidding, etc. Pre-work meetings with the contractor ensure that critical site factors are identified, while interim and final inspections monitor site degradation levels and intended outcomes.

**Indicator 7:** *Road construction and skidding layout to minimize impacts to soil productivity and water quality.*

The FSPs specify maximum allowable limits for site degradation due to access and harvesting disturbances. Terrain and soil maps are used in conjunction with field-level information in planning and assessing road location, layout, and design.

### **Performance Measure 2.4.**

*Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability.*

**Indicator 1:** *Program to protect forests from damaging agents.*

Damaging agents include windthrow, fire, pests and diseases. The MFLNRO monitors forest health concerns by conducting aerial overview flights on an annual basis, and making the results available to Licensees for consideration in developing harvest plans. Aggressive salvage harvesting is conducted consistent with Forest Health strategies contained in the FSPs, while considering and managing impacts to other resource values to acceptable levels.

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Post harvest slash accumulations result from forest harvesting activities. These accumulations are generally piled and burned, or may be dispersed in such a way as to reduce fuel loading and/or the risk of ignition. However, in some instances, slash piles will be retained in low-risk areas to serve as wildlife habitat features.

Site level plans developed by Registered Professional Foresters assess current and potential forest health factors, and prescribe appropriate management actions.



***Indicator 2: Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.***

The FRPA, KBHLP and the OSLRMP contain direction on strategies and approaches to addressing forest health issues, which is delivered through the FSPs.

Prompt regeneration of multiple species through a combination of planted and natural regeneration promotes a diverse second growth stand. Site preparation, slash management, and fertilizers are some of the techniques used to encourage the growth of seedlings.

***Indicator 3: Participation in, and support of fire and pest prevention and control programs.***

Fire Preparedness and Response Plans are updated annually. These plans set out the requirements for fire fighting preparedness, education, training, and appropriate fire fighting tools. Inspections are conducted during operations ensure compliance with the Fire Preparedness Plans. CFP and GBL participate in the Okanagan Shuswap TSA

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Steering Committee, and also provide input to Provincial initiatives such as the Wildfire Act and the proposed Open Burning Smoke Control Regulation.

The province collects an annual fire protection levy from each licensee in return for fire fighting services.

### **Performance Measure 2.5.**

*Program Participants* that deploy *improved planting stock*, including *varietal seedlings*, shall use sound scientific methods.

**Indicator 1:** *Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including varietal seedlings.*

All forest regeneration is conducted according to the Chief Forester's Standards for Seed Use. These standards apply to:

- a) A person who uses seeds or vegetative material for the purposes of establishing a stand under section 29 of the Forest and Range Practices Act.

The purpose of these standards is to maintain the identity, adaptability, diversity and productivity of the Province's tree gene resources by;

- a) Establishing criteria for the registration of seedlots and vegetative lots used to establish a stand under section 29 of the Act, and
- b) Regulating the storage, selection, use and transfer of registered lots.

Suitable seedlots are chosen at the time of sowing from the MFLNRO **Seed Planning And Registration (SPAR)** system, and are also identified at the time of the Free Growing declaration in the RESULTS system. An appropriate seedlot that conforms to the Chief Forester's Standards for Seed Use must be used unless a rationale for variance is submitted and accepted by the MFLNRO.

All seedlings are grown in privately owned nurseries, each of which is involved in various research endeavours and trials for the forest industry and the MFLNRO.

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**Objective Supporting Information and Records**

FSPs

SPs, Operational Plans – hard copies kept on file.

SPAR, PhoenixPro, RESULTS

Chief Foresters Standards for Seed Use

**OBJECTIVE 3.0. PROTECTION AND MAINTENANCE OF WATER RESOURCES.**

To protect water quality in rivers, streams, lakes, and other water bodies.

**Performance Measure 3.1.**

*Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency–approved water quality programs.*

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***Indicator 1: Program to implement state or provincial Best Management Practices during all phases of management activities.***

Our commitment to maintaining water quality will be met through the fulfillment of the objectives, results and strategies stated within the approved FSPs. The FSP are consistent with current Provincial legislation and incorporate Best Management Practices (measures) from the relevant land use plans (KBHLP, RMAC or OSLRMP). The measures contained in the FSPs are generally more stringent than the generic provincial requirements.

Criteria for carrying out activities around streams, lakes and wetlands are addressed within the FSP and associated operational plans. Monitoring and implementation of those activities is conducted according to Best Management Practices (BMP's) within the EMS program. If conditions are identified where operations on sensitive soils may impact water quality, those activities are restricted or managed by including measures in the appropriate Operational Plan.

Training, awareness, and competency of staff and contractors are key components of a program aimed at managing impacts to the environment. The EMS requires a training program to identify, deliver and record environmental training for all individuals that have potential to significantly impact the environment. Further procedures, pre-work checklists, and ongoing inspections address specific environmental aspects such as water quality and management practices within riparian zones. Professional and technical staff that conduct site level planning prescribe activities in a manner that is compliant with water quality and riparian management regulations. The professional and technical staff and contractors participate in various provincial BMP training sessions such as gully assessment, windthrow assessment, etc..

***Indicator 2: Contract provisions that specify conformance to best management practices.***

All contracts include a commitment to conduct work in accordance with SFI and other systems. Contractors that have the potential to significantly impact the environment are required to have various certifications and training appropriate to the level of risk associated with their activity, and are required to comply with EMS.

***Indicator 3: Plans that address wet-weather events (e.g., inventory systems, wet-weather tracts, definitions of acceptable operating conditions).***

Shutdown criteria are specified in all Operational Plans, Standard Operating Procedures, and within the elements of the EMS. Company Supervisors and contractors monitor weather conditions that could cause operations to be shut down.

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**Indicator 4:** *Monitoring of overall Best Management Practices implementation.*

Monitoring and measurement of Best Management Practices are carried out at a frequency described in the EMS. Pre-work, interim, and final inspections as well as internal audits are completed on a regular basis by both Supervisors and contractors to monitor quality and ensure compliance with operations plans and contract specifications. Government agencies also conduct compliance inspections on an infrequent basis.

### **Performance Measure 3.2.**

*Program Participants* shall have or develop, implement and document *riparian protection* measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors.

**Indicator 1:** *Program addressing management and protection of rivers, streams, lakes, and other water bodies and riparian zones.*

Prescriptive measures to protect water quality and riparian zones are specified in Land Use Plans, incorporated into FSPs as results / strategies, specified in SPs as prescriptive measures, and ultimately applied on the ground through the implementation of operational plans.

Staff and Contractors are required to be trained in EMS awareness, as well as specific Best Management Practices pertaining to the preservation of water resources.

Measures to protect water quality are also found in the Spill Prevention and Response Plans.

**Indicator 2:** *Mapping of rivers, streams, lakes, and other water bodies as specified in state or provincial Best Management Practices and, where appropriate, identification on the ground.*

Stream, lake or wetland classification is based on available forest inventory mapping and fish inventory/habitat mapping that is available on both government and proprietary GIS systems. This “online” information is verified and refined during field layout and site plan data collection.

**Indicator 3:** *Implementation of plans to manage or protect rivers, streams, lakes, and other water bodies.*

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Road and harvesting site plans and other operational plans specify protection measures for streams, sensitive soils or wet soils and other water bodies during harvesting, road construction and other forest activities. Inspections and monitoring through the EMS verify that measures are implemented correctly.

**Indicator 4:** *Identification and protection of non-forested wetlands, including bogs, fens, and marshes, and vernal pools of ecological significance.*

Mapping, identification, classification of riparian features is conducted as part of the operational planning process (see above) – preliminary inventory data is refined through field / site level surveys at the layout stages. Specific measures to protect water quality and riparian zones are found within the FSPs and Site Plans developed by Forest Professionals.

**Indicator 5:** *Where regulations or Best Management Practices do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.*

Regulations exist for protection of riparian areas. Regulations and suggested management practices (BMPs) are established in federal and provincial legislation, regulations, local Land Use Plans, as well as in FSP and site level plans.



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**Objective Supporting Information and Records**

FSP

SP's, Operational Plans – hard copies kept on file.

PhoenixPro, RESULTS

**OBJECTIVE 4. CONSERVATION OF BIOLOGICAL DIVERSITY INCLUDING FORESTS WITH EXCEPTIONAL CONSERVATION VALUE.**

To manage the quality and distribution of *wildlife habitats* and contribute to the *conservation of biological diversity* by developing and implementing *stand-* and *landscape-level* measures that promote a diversity of types of *habitat* and successional stages, and *conservation* of forest plants and animals, including *aquatic species*.

**Performance Measure 4.1.**

*Program Participants* shall have *programs* to promote *biological diversity* at *stand-* and *landscape-levels*.

**Indicator 1:** *Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological community types.*

Land Use Plans provide the framework for conservation of biological diversity through a 3 layered approach that entails the identification and establishment of Parks and Protected Areas, designation of Old Growth Management Areas (OGMAs), and site specific wildlife tree retention areas (WTRAs) and riparian reserves. Special wildlife habitats (eg, caribou in the north, and a variety of arid/dry-belt species in the south) are protected through establishment of Wildlife Habitat Areas, and government Orders (GAR) that identify / restrict forest management practices in specific habitat types.

This legal framework is reflected within the FSPs and other operational plans.

Professional and technical staff involved in site level planning and layout must consider Identified Wildlife, rare/important/endangered wildlife and/or plant communities when developing prescriptions. Where these habitats/species/communities coincide with forest management activities, appropriate measures must be developed for the Site Plan – such measures are often prepared in consultation with qualified biologists. Operational implementation and monitoring is conducted through the EMS mechanisms.

Consistent with the FSPs, between 3 and 11% of a cut block area is retained as Wildlife Tree Retention Areas (WTRA) - the specific amount of WTRA in the Okanagan TSA required is dependent on the Landscape Unit and Biogeoclimatic subzone.

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In the Revelstoke TSA, WTRA retention levels are dependant on block size, harvest method and salvage considerations as specified in the FSP.

### ***Indicator 2: Program to protect threatened and endangered species.***

Under the Province's *Government Actions Regulation* (GAR), notices may be published establishing Wildlife Habitat Areas, Wildlife Habitat Features, Species at Risk areas etc. GCD complies with all requirements of these notices and will comply with requirements of future notices. Examples of GAR notices include the Great Basin Spadefoot, the Coeur d'Alene Salamander, and Mountain Caribou Ungulate Winter Range.

CFP's Species at Risk Guidebook was derived by reviewing the BC Ministry of Environment's "BC Species and Ecosystem Explorer" and filtering down to species and ecosystems within CFP's operating area. The Guidebook assists through identification and management strategies (including stop work) in protecting species at risk including threatened or endangered or critically imperiled or imperiled plants, animals, and ecological communities.

GBL has developed a SOP for Rare /Endangered Species along with a GIS coverage that incorporates the "red/blue" species resource management zone from the OSLRMP, Conservation Data Center known sightings for rare species, and likely areas of occurrence for identified species of concern. Site specific strategies are developed through the course of development and implemented through the EMS framework for operations.

The Revelstoke Higher Level Plan Order (RHLPO) includes management requirements for grizzly bears. DTL complies with the RHLPO requirements for managing grizzly bear habitat.

The federal government Species at Risk Act website provides an email notification for changes regarding species at risk.

Annual training around threatened and endangered species awareness is provided for staff and contractors as part of the EMS.

***Indicator 3: Program to locate and protect known sites associated with viable occurrences of critically imperilled and imperilled species and communities also known as Forest with Exceptional Conservation Value. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.***

Management of identified wildlife and rare/important plant communities that are identified from inventory information or during fieldwork are addressed by legislation, the FSPs, and mitigating measures contained in site level plans.

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For example, Wildlife Habitat Areas (WHAs) have been established for the Coeur d'Alene Salamander in DTL's operating area, and for Williamson's Sapsucker in the GBL operating area.

Specific requirements for Marten, Fisher, Bighorn Sheep, Moose, Mountain goat, Mule Deer, and Caribou have been adhered to within the Okanagan TSA through inclusion of specific measures in landscape level planning and specific Site Plans.

Much of the Engelmann Spruce Subalpine Fir subzone located within northern portion of the Okanagan TSA is designated Caribou Reserve as part of a recovery strategy. Caribou GAR reserves have been mapped as no-harvest areas.

Approximately 2,200 hectares of Enhanced Riparian Reserves (ERR) is identified within the Okanagan TSA. The ERR connects OGMA's and places more sensitive riparian area into reserves.

***Indicator 4: Development and implementation of criteria, as guided by regionally appropriate best scientific information, to, retain stand level wildlife habitat elements such as snags, stumps mast trees, down woody debris, den trees and nest trees.***

Stand level biodiversity and wildlife habitat elements are addressed through retention of wildlife tree retention areas (WTRA) consisting either of individual or patches of trees. The FSPs specify the requirements for WTRA retention and measures for management of old growth management areas (OGMAs).

Coarse Woody Debris retention levels are specified for sites, while standing trees and stubs are often left within blocks providing structural diversity.

Mixed species planting is encouraged, especially where root disease is present. Where it does not interfere with free growing criteria, deciduous trees and understory vegetation are retained as part of the post harvest stand.

Trees that contain active bird nests are protected from harvest by Wildlife Habitat Areas, federal /provincial legislation, or as described within the CFP Species at Risk Guidebook.

Pre-works conducted under the EMS ensure that these elements are communicated to the Contractor, while regular inspections ensure the required results / objectives are achieved.

***Indicator 5: Program for assessment, conducted either individually or collaboratively, of forest cover types, ages or size classes and habitats at the individual ownership level and, where credible data are available, across the landscape, and take into account findings into planning and management activities.***

All three TSAs have recently updated forest cover inventory information that provides the basis for analysis of forest types and management conditions for planning purposes.

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In addition the Biogeoclimatic Ecosystem Classification (BEC) is used to classify forested ecosystems. The BEC is a hierarchical system that uses climate, soil and vegetation to group ecosystems at various levels, including regionally, locally and chronologically.

Predictive ecosystem mapping (PEM) has been completed for the majority of DTL's operating area and all of the Okanagan TSA. The results can be used for watershed or sub-unit planning purposes to highlight potential habitat and plant community areas.

***Indicator 6: Support of and participation in plans or programs for the conservation of old growth forests in the region of ownership.***

Old Growth Management Areas were identified within the Okanagan TSA by a joint committee, including environmental groups, prior to 2004. These areas are treated as reserves with limited or minor incursion allowed. The joint committee used a geographic information system and available forest cover information. OGMA selection criteria included an "oldest first" priority within a Biogeoclimatic subzone / Landscape Unit combination. Other criteria included rare ecosystems, sensitive terrain, caribou habitat, riparian areas, wetlands, recreation features, and Lakeshore Management Zones.

Within the Revelstoke and Golden TSAs, OGMA's are a legal requirement and must be managed to the levels specified in the Revelstoke and Golden Higher Level Plan Orders. DTL has spatially identified OGMA's within their operating area using criteria contained in these Orders.

***Indicator 7: Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plants and animal communities.***

CFP: Invasive plants are the focus of the Invasive Plant Guidebook. Identification of invasive plants and some simple management strategies, such as grass seeding disturbed soils, are helpful in mitigating spread of invasive plants.

DTL: Where the introduction or spread of invasive plants is likely, invasive plant management will be conducted in accordance with the measures provided in Downie's FSP and operational plans.

GBL: Gorman Bros. participates in the Okanagan and Similkameen Invasive Species Society both as a member/director, and as a program/research sponsor. Forest operations in areas where the introduction or spread of invasive plants is likely are conducted in accordance with the measures provided in the FSP.

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**Indicator 8:** Program to incorporate the role of prescribed or natural fire where appropriate.

With the exception of roadside and landing slash accumulations and in block slash piles prescribed fire / broadcast burning is not used due to the high level of risk and the potential negative consequences to coarse woody debris.

In recognition that fire is an important tool in reforestation and ecosystem health, GBL and CFP are involved with the Steering Committee of the MFLNRO Ecosystem Restoration Program. The purpose of the ER program is to re-introduce fire into certain fire-maintained ecosystems through fuel management and prescribed burning at appropriate times of the year. Most of the activities occur outside the commercial forest landbase at this time.

### **Performance Measure 4.2.**

*Program Participants* shall apply knowledge gained through research, science, technology, and field experience to manage *wildlife habitat* and contribute to the *conservation of biological diversity*.

**Indicator 1:** Collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing non-proprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.

**Indicator 2:** A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.

The ABCFP, FORREX, OBWB, PEFC, UBC Forestry, CDC, the MFLNRO, and various other groups maintain websites and newsletters to disseminate information on current research projects. These information centers help to keep practitioners aware of new forest management techniques, public opinion and forest policy/guidelines.

#### CFP/GBL:

Results and Strategies contained in the FSP are consistent with the values and management direction identified through the OSLRMP process. Participation and funding are provided for ongoing research programs that provide the science used to support the objectives. For example, through membership in the Okanagan Innovative Forestry Society (OIFS), funding is provided to monitor caribou and wolf populations in the Shuswap area, and to establish post-harvest debris trials for Marten habitat in the

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Okanagan. Through membership in the OSLRMP Caribou Sub-committee, input is provided towards the implementation of the habitat identification and management regimes.

Both CFP and GBL have contributed sites and equipment time to construct research trials, and have first-hand access to results. The results are incorporated in normal forest management activities such as debris piling, site preparation, and fuel hazard management as Best Management Practices.

The FSPs incorporates Objectives for Biodiversity including OGMA's, CWD, WTRA's etc. As research evolves, the results will be incorporated into operational plans through BMPs or as FSP results/strategies.

### DTL:

Objectives in the FSP are tailored to meet the intent of the Revelstoke (RMAC) and Kootenay-Boundary Higher Level Plans. DTL participates in a variety of science-based initiatives to develop and support the FSP objectives. For example, the mapping of mountain caribou reserves and OGMA's was conducted in partnership with industry, government agencies, biologists and others. DTL has made FIA funding available for biodiversity and caribou projects, and is supporting the Revelstoke Caribou Rearing in the Wild Project. Membership with the Columbia Mountains Institute of Applied Ecology (CMI) provides a direct linkage to CMI's objectives of encouraging ecosystem research and the dissemination of knowledge. DTL is also an active member of "Links" – a local committee that links researchers and operation foresters, land managers, guides, outfitters and other users of forestlands. Information and findings arising from Downies association with these groups are often incorporated into operational plans as Best Management Practices where operationally and economically feasible.

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***Objective Supporting Information and Records***

FSPs, FCL SAR Guidebook Version 1.0, FCL Invasive Plant Guidebook Version 1.0

SP's, Operational Plans – hard copies kept on file.

PhoenixPro, RESULTS

**OBJECTIVE 5. MANAGEMENT OF VISUAL QUALITY AND RECREATIONAL BENEFITS.**

To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Performance Measure 5.1.**

*Program Participants shall manage the impact of harvesting on visual quality.*

**Indicator 1:** Program to address visual quality management.

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Visual Quality Objectives (VQO) within known scenic areas have been established in the 3 TSAs and TFL 33. The FSPs contain legal results/strategies to manage for visual quality to a level that meets the standards determined in the Land Use Plans and legal orders.

The general objective for Scenic Areas is to maintain naturally appearing landscapes and to encourage new practices and techniques that maintain visual quality.

**Indicator 2:** *Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.*

Proposed cutblocks and roads within visually sensitive areas will be designed and assessed by a competent professional to ensure that the proposed developments meet the definition of the established VQO as described in the FSP.

A Visual Impact Assessment considerate of the relevant guidelines will be completed and kept on file. The recommendations stemming from the Visual Impact Assessment will be implemented during the operations phases where practical and safe to do so.

Openings within scenic areas will be designed consistent with natural landscape features, with their location shape and scale having regard for visual design principles. Tree Retention Strategies will be undertaken within the design, with their location, shape and scale having regard for visual design principles.

### **Performance Measure 5.2.**

*Program Participants* shall manage the size, shape and placement of clearcut harvests.

**Indicator 1:** *Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements or respond to forest health emergencies or other natural catastrophes.*

The FSPs contain results / strategies that specify maximum cut-block sizes of 40 ha which may be exceeded in certain situations in accordance with FRPA (i.e. areas where visual rehabilitation is required, or where or forest health conditions or other natural catastrophes require larger sizes).

**Indicator 2:** *Documentation through internal records of clear cut size and the process for calculating average size.*

Cut-block size is tracked within the PhoenixPro forest management system data base and site plans.

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### **Performance Measure 5.3.**

*Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.*

***Indicator 1: Program implementing the green-up requirement or alternative methods.***

Visual design (design and assessment) incorporate visual green up in the design of proposed cutblocks and roads. The FSPs have specific Results and Strategies that deal with Visual Quality Objectives.

***Indicator 2: Harvest area tracking system to demonstrate conformance with the green up requirement or alternative methods.***

Forest inventory information, combined with silvicultural survey data entered into the RESULTS and PhoenixPro tracking systems provide information on adjacency / greenup status. Further, visual impact assessments quantify the existing and proposed non-greened-up areas within a visual assessment unit. The VIA is referenced in specific Site Plans as a supporting document.

***Indicator 3: Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.***

Within the Okanagan and Revelstoke TSAs, the minimum height for adjacency/greenup is 2 meters (6.5 feet) and 2.5 (8.2 feet) meters for the Golden TSA unless otherwise specified to manage for other resources. The FSPs are consistent with this requirement.

The FSPs contain results/strategies that facilitate the restoration of visually impacted landscapes to those sites in Zone 1 on the “Visual Management RMZ” map that have been visually impacted by past development. The concept of Visual Rehabilitation through application of visual design principles and harvesting to restore a natural landscape appearance is consistent with the Okanagan Shuswap LRMP Visual Quality Guidelines.

Visual rehabilitation is defined as: In locations where existing logged and/or regenerated openings have existing shapes in the perspective view that have poor design, shape, line, form additional harvesting will planned with principles of visual design to make improvements in the perspective view to the existing visual condition.

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**Performance Measure 5.4.**

*Program Participants shall support and promote recreational opportunities for the public.*

**Indicator 1:** *Provide recreational opportunities for the public, where consistent with forest management objectives.*

Recreation opportunities are identified within the OSLRMP, RMAC and the KBLUP while specific features such as trails are normally identified through “local knowledge”. Regular discussion and cooperation with the many groups that utilize the forest for recreation occurs as part of the standard forest development referral/notification process.

Trail management through groups such as guide-outfitters, snowmobile, horseback, and hiking clubs involves identifying or planning trails in the various operating areas. Discussion between forest licensees and recreation groups regarding trail placement and road maintenance is critical so as to provide recreational opportunities in a safe environment in concert with ongoing forest management activities.

Recreation features are catalogued in GIS format for easy reference by forest planners and operations supervisors. New features are added to the GIS as they become known, either through official notification, or through discovery in the field during layout and development.

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**Objective Supporting Information and Records**

OSLRMP, FSP, SFMP Correspondence

SP's, Operational Plans, Visual Impact Assessments – hard copies kept on file.

PhoenixPro, RESULTS

**OBJECTIVE 6. PROTECTION OF SPECIAL SITES.**

To manage lands that are ecologically, geologically or *culturally important* in a manner that takes into account their unique qualities.

**Performance Measure 6.1.**

*Program Participants* shall identify *special sites* and manage them in a manner appropriate for their unique features.

**Indicator 1:** Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting special sites for protection.

Special Sites:

Policies, programs and plans are contained within FSPs and site level plans. Professional and technical staff involved in site level planning and layout are knowledgeable in applicable laws, regulations and guidelines regarding management of special sites. EMS awareness training and operational controls assist personnel in identifying special sites as they are encountered in the field.

The Athabasca Heritage Trail in the Golden TSA is considered a 'special site' designated under the Heritage Conservation Act. The David Thompson Heritage trail, located in DTL's operating area, is protected and managed in accordance with Provincial and Federal legislation and policies and the FSP.

Ecological

Rare ecological communities (sites) are addressed within CFP's Species At Risk Guidebook. Many sites in the Okanagan / Shuswap that are considered ecologically special were included within the Protected Area Strategy and are now parks - e.g., Grasslands Parks in the south Okanagan, and Anstey Hunakwa Park in the Shuswap. There are no rare ecological communities identified within DTL's operating area, however, areas such as Glacier National Park, and Canyon Hot Springs could be considered as "rare" ecological communities.

Cultural

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*Archaeological Sites:* A professional archaeologist conducts an archaeological overview for proposed development (roads and cutblocks) where archaeological potential is considered to be significant. Where deemed appropriate by the archaeologist or one of the First Nations bands during the archaeologist's referral, archaeological impact assessments are conducted in the field.

Archaeological overview mapping (AOA) is available within the operating areas. In specific areas and harvesting proposals, Preliminary Field Reconnaissance (PFR) or archaeological impact assessments (AIA) are conducted by Professional Archaeologists if required.

Sites predating 1846 are protected from disturbance under the Heritage Conservation Acxt. For sites that post-date 1846, the archaeologist will recommend protection measures that may be incorporated into operational plans. Examples of sites that have been found include petro glyphs, burial mounds, middens, culturally modified trees, and lithic scatter (i.e. stone tools and chipped stone debris).

### *Cultural Heritage Resources:*

Cultural heritage resources (CHR) will be protected and managed in accordance with the results/strategies for CHR contained in the FSPs. First Nations have on going traditional uses and/or cultural heritage resource interests within the operating areas. Each Band is provided regular (annual) opportunity to review proposed cutblock and road locations through FSP information sharing processes, and asked to identify sites that are culturally important. Examples of culturally important sites can include berry-picking, wood or material gathering, spiritual use, or other traditional uses.

Other Cultural Sites:

Historic cabins will be mapped within Site Plans / Logging Plans and protected through site marking, fall-away, skid-away practices.

### *Geological*

Within the operating area, there are no known special geological sites outside of already designated parks / protected areas. Most significant geological features are outside of the normal areas of operation, so are at low risk of impact by forest management activities. Some examples may include large lava caves and interesting rock formations.

If any Special Sites are found, employees and contractors have been directed to stop work and report the feature to the Company representative, who will then contact the appropriate professional or agency to determine mitigation measures before proceeding.

***Indicator 2: Appropriate mapping, cataloguing, and management of identified special sites.***

GIS layers that identify Special Sites are maintained by each company. The layer will be accessed during development planning and as required.

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## Objective Supporting Information and Records

FSP, GIS

SP's, Operational Plans – hard copies kept on file.

Special ecological sites will be reported to the BC Conservation Data Centre.  
Protected Archaeological Sites are reported to the Archaeology Branch.  
All features are tracked on a corporate GIS coverage for future reference.

## OBJECTIVE 7. EFFICIENT USE OF FOREST RESOURCES.

To promote the efficient use of forest resources.

### Performance Measure 7.1.

*Program Participants* shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to *minimize* waste and ensure efficient utilization of harvested trees, where consistent with other *SFI Standard objectives*.

**Indicator 1a-e:** Program or monitoring system to ensure efficient utilization, which may include provisions to ensure:

- a. management of harvest residue (e.g. slash, limbs, tops) considers economic, social and environmental factors (e.g. organic and nutrient value to future forests) and other utilization needs;
- b. training or incentives to encourage loggers to enhance utilization;
- c. cooperation with mill managers for better utilization of species and low-grade materials;
- d. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g. bioenergy markets); or
- e. periodic inspections and reports noting utilization and product separation.

Forest tenures are governed by the provincial “take or pay” policy, which stipulates that all merchantable timber under Cutting Permit or Road Permit whether it is utilized or not, is billed at the assigned stumpage rate, and charged to AAC.

Utilization is monitored in accordance with the provincial Waste and Residue Manual, which specifies the utilization standards to be met. Permit documents describe utilization standards to be achieved.

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Operational plans specify standards for post harvest conditions that are communicated to the contractor at pre-work meetings, and are monitored during, and after harvesting through the EMS mechanisms.

Harvested areas are surveyed for levels of waste, exclusive of CWD requirements, at the completion of harvest. Any waste in excess of the maximum allowable is charged and tracked through government's Waste and Billing System.

Wood volume that cannot be manufactured at one of the facilities may be marketed. For example, pulp quality wood may be sold to chipping facilities or directly to pulp producers. Other volumes (such as cedar shake wood or post & rail logs) may be marketed to specialty producers depending on markets and economics.

Investment in improving recovery of finished product from raw logs is an ongoing process at each of the processing facilities. Substantial investment in the Downie and Gorman operations over the last 10-15 years has resulted in very efficient use of the resource. Capital upgrades are planned for the Canoe veneer line in 2013 to increase the amount and type of logs consumed, while improving the veneer recovery at the same time.



### ***Objective Supporting Information and Records***

Waste and Residue Summary

Log Sale Summaries

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**DOWNIE**  
TIMBER LTD.

**CANOE** brand®  
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**GORMAN**  
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## SFI 2010-2014 STANDARD OBJECTIVES 8-13 FOR FIBER SOURCING

### SFI OBJECTIVES 8-13 FOR FIBER SOURCING

Fiber sourcing within the United States and Canada (Objectives 8-10 apply).

#### OBJECTIVE 8. LANDOWNER OUTREACH

To broaden the practice of *sustainable forestry* by forest landowners through *fiber sourcing programs*.

#### Performance Measure 8.1.

*Program Participants* shall provide information to landowners for *reforestation* following harvest, for the use of *best management practices*, and for identification and *protection* of important *habitat* elements for *wildlife and biodiversity*, including *Forests with Exceptional Conservation Value*.

**Indicator 1a-g:** *Program Participants shall supply regionally appropriate information or services (ie. information packets, websites, newsletters, workshops, tours, etc.) to forest landowners, describing the importance and providing implementation guidance on:*

- a. best management practices;*
- b. reforestation and afforestation;*
- c. visual quality management;*
- d. conservation of critical wildlife habitat elements, bio-diversity, threatened and endangered species, and Forest with Exceptional Conservation Value;*
- e. management of harvest residue (ie. slash, limbs,, tops) considers economic, social, environmental factors (ie. organic and nutrient value to future forests) and other utilization needs;*
- f. control of invasive exotic plants and animals; and*
- g. characteristics of special sites.*

The scope of the Wood Purchase Program includes the purchase and delivery of wood from

- producers that are certified under a sustainable forest management program,
- tenured producers (such as Timber Sale Licenses, Non-Replaceable Salvage Licenses, Woodlots and Forestry Licence to Cut - Salvage Licenses) that are managed through Provincial Forest Legislation, but are not “certified”, and

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- private landowners.

Under the program, wood producers are provided an information package containing information on Sustainable Forest Management. The information package is modeled after the Western Canada Sustainable Forestry Initiative Implementation Committee (WCSIC) package for Wood Producers and includes implementation guidance information describing the importance of Best Management Practices, Reforestation and Afforestation, Invasive Exotic Plants and Animals, Water Quality and Riparian Management, Soil Conservation, Wildlife Management, Forests with Exceptional Conservation Value, Species at Risk in Canada – SARS, Special Sites, Coarse Woody Debris/Harvest Residue and Visual Quality. The package also encourages landowners to participate in forest management certification programs.

**Indicator 2:** Program to address Forests with Exceptional Conservation Value in harvests of purchased stumpage.

In respect to FECV's, tenured operations in BC are required to follow legal requirements that include addressing SAR (Species at Risk – a federal program). FECV's have been addressed within the Old Growth Management Areas (i.e. – considered in recovery planning for Caribou and White-headed Woodpecker) or addressed within site specific plans such as FSP's, SP's, or WHAs. The Wood Producer Information Package given to wood producers provides information on FECV's to private landowners.

BCTS Timber Sales or similar tenured sales purchased through the Wood Purchase Program and are not managed directly, but through a third-party (e.g., an arm's length logging contractor). While the purchased wood may be delivered to one of our facilities, the legal right or obligation to harvest the timber remains with the third-party.

*FECV's for GGoC's licensed tenures (subject to FSPs) are managed as per Objective 4 of this SFMP - Conservation of Biological Diversity including Forests with Exceptional Conservation Value.*

**Indicator 3:** Encourage forest landowners to participate in forest management certification programs.

The Wood Procurement Policy and Program is described in Objective 10, below.

### **OBJECTIVE 9. USE OF QUALIFIED RESOURCE AND QUALIFIED LOGGING PROFESSIONALS.**

To broaden the practice of *sustainable forestry* by encouraging forest landowners to utilize the services of forest management and harvesting professionals.

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### Performance Measure 9.1.

*Program Participants* shall encourage landowners to utilize the services of *certified logging professionals* (where available), *qualified resource professionals* and *qualified logging professionals* in applying *principles* of sustainable forest management on their lands.

**Indicator 1:** Program to promote the use of *certified logging professionals* (where available), *qualified resource professionals* and *qualified logging professionals*;

**Indicator 2:** List of *certified logging professionals* and *qualified logging professionals* maintained by *Program Participant*, *state or provincial agency*, *loggers' association* or *other organizations*.

The Wood Producer Information Package includes a list of Qualified Resource Professionals' (QRP's) and qualified logging professionals that are trained and experienced in the SFMP and EMS. In addition, each company maintains a list of qualified contractors that have received training in various elements of forest management, and are competent to supply services such as forest development, tree planting, brushing, etc..

### OBJECTIVE 10. ADHERENCE TO BEST MANAGEMENT PRACTICES.

To broaden the practice of *sustainable forestry* through the use of *best management practices* to protect water quality.

### Performance Measure 10.1.

*Program Participants* shall clearly define and implement *policies* to ensure that facility inventories and *fiber sourcing* activities do not compromise adherence to the *principles* of *sustainable forestry*.

**Indicator 1:** Program for the purchase of raw materials from *certified logging professionals* (where available) and from *wood producers* that have completed training programs and are recognized as *qualified logging professionals*.

is combined with....

**Indicator 5:** *Program Participants* shall clearly define *their fiber sourcing policies* in writing and make them available to *wood producers*.

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Purchases of wood from outside interests will be tracked, with a preference to purchase from parties that practice sustainable forest management.

All wood purchased from the BCTS program is certified under SFI or CSA. Many trading partners have tenured licences certified under either SFI or CSA. Other tenured wood producers (Woodlots, Salvage Licenses, etc.) must meet legislative requirements that include Best Management Practices stipulated in either their licence document, or in the government approved management plan.

Private land purchases will be guided by Performance Measure 8.1. The wood procurement policy/program, log purchase/risk assessment questionnaire and log purchase contract are an integral component of the program.

The Chain of Custody SOPs, the PEFC risk assessment and Chain of Custody training information for GBL and DTL provide additional rigor around fibre sourcing with respect to Best Management Practices and sustainable forest practices.

***Indicator 2: Program to require that harvests of purchased stumpage comply with best management practices (BMP).***

Refer to Indicator 3, below.

***Indicator 3: Contracts for the purchase of raw materials include provisions requiring the use of best management practices (BMP).***

The wood procurement policy/program and the log purchase/risk assessment questionnaire provide information on BMPs. Log purchase contracts contain a statement that requires the seller to comply with and use BMPs.

***Indicator 4: Program to address adverse weather conditions.***

Recommendations to address adverse weather conditions are provided to private land wood producers in the Wood Purchaser Information package.

### **Performance Measure 10.2.**

*Program Participants shall monitor the use of best management practices.*

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**Indicator 1a & 1b:** A verifiable monitoring system to:

- a. monitor the use of best management practices by wood producers supplying the Program Participant; and
- b. evaluate use of best management practices across the wood and fiber supply area.

The WCSIC risk rating system is used as a basis to evaluate the requirement for inspections. Documented inspections will be conducted on a periodic basis for Wood Producers that meet the definition of “Low Risk” under the WCSIC risk process for compliance to Best Management Practices. The wood procurement policy and log purchase/risk assessment questionnaire provides additional information.

**Indicator 2:** Use of information from the verifiable monitoring system to maintain rates of conformance to best management practices and to identify areas for improved performance.

Annual inspection summaries are submitted to WCSIC annually. The submissions from all WCSIC members are summarized in a document called the *WCSIC Purchase Monitoring Report*. This information is reviewed as part of the *annual* Management Review to assess overall conformance, and identify opportunities for improvement.



### Objective Supporting Information and Records

Procurement Inspection Forms, Wood Producer Information Packages, Log Purchase Agreements, Log Purchase Annual Summaries

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**Objectives 11-13:**

**Fiber sourcing sources outside the United States and Canada does not occur, therefore, Objectives 11-13 do not apply.**

**SFI 2010-2014 STANDARD OBJECTIVES 14-20 FOR FOREST LAND  
MANAGEMENT AND FIBER SOURCING**

**OBJECTIVE 14. LEGAL AND REGULATORY COMPLIANCE.**

Compliance with applicable federal, provincial, state and local laws and regulations.

**Performance Measure 14.1.**

*Program Participants* shall take appropriate steps to comply with applicable federal, provincial, state and local *forestry* and related social and environmental laws and regulations

**Indicator 1:** *Access to relevant laws and regulations in appropriate locations.*

The EMS manual provides guidance on how access legal and other requirements applicable to forest management are to be accessed, as well as how these requirements are provided to personnel (see Legal and Other Requirements section). Subscriptions to 'QuickScribe Online' at [www.quickscribe.bc.ca](http://www.quickscribe.bc.ca) provide access to all federal and provincial legislation, as well as a multitude of government policy manuals and other guidance.

Ad hoc correspondence from COFI, the ILMA and other industry associations provides summaries and interpretations of recently enacted forestry-related legislation.

**Indicator 2:** *System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.*

The EMS Manual provides a framework for environmental monitoring (see Monitoring and Measuring Section). It also describes the requirements and procedures for tracking and addressing any non-conformances with the EMS, as well as any non-compliances with federal or provincial legislation.

Staff and contractor EMS training is an annual requirement, and is revised in response to changes in regulatory revisions, changes to the SFI Standard, or other relevant policies/practices (see Training and Awareness section).

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**Indicator 3:** *Demonstration of commitment to legal compliance through available regulatory action information.*

The Internal Audit Program outlined in the EMS provides an independent assessment of legal compliance at the operations level. The MFLNRO Annual Compliance Report lists non-compliances identified or tracked by the Compliance and Enforcement Program. Records of all MFLNRO inspections are retained at the respective Woodlands Office.

**Performance Measure 14.2.**

*Program Participants* shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the *Program Participant* operates.

**Indicator 1:** *Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.*

Refer to Indicator 2, below.

**Indicator 2:** *Forestry enterprises will respect the rights of workers and labour representatives in a manner that encompasses the intent of the International Labour Organization (ILO) core conventions.*

Company hiring policies in conjunction with the Environmental Policy commit to complying with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, and occupational health and safety and respects the rights of workers and labour representatives.

Employees at the Canoe veneer plant and plywood operation are subject to a collective labour agreement with the United Steelworkers union.

Contracts contain a provision that commits contractors to adhere to the Employment Standards Act.

***Objective Supporting Information and Records***

EMS

Environmental Policy, Occupational Health and Safety Program

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### OBJECTIVE 15. FORESTRY RESEARCH, SCIENCE, AND TECHNOLOGY.

To support *forestry* research, science, and technology, upon which sustainable forest management decisions are based.

#### Performance Measure 15.1.

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve *forest health, productivity*, and sustainable management of forest resources, and the environmental benefits and performance of forest products.

**Indicator 1:** *Financial or in-kind support of research to address questions of relevance in the region of operations. The research will include some or all of the following issues:*

- a. *forest health, productivity, and ecosystem functions;*
- b. *chemical efficiency, use rate, and integrated pest management;*
- c. *water quality and/or effectiveness of best management practices including effectiveness of water quality and best management practices for protecting the quality, diversity and distributions of fish and wildlife habitats;*
- d. *wildlife management at stand or landscape levels;*
- e. *conservation of biological diversity; and*
- f. *ecological impacts of bioenergy feedstock removals on productivity, wildlife habitat, water quality and other ecosystem functions;*
- g. *climate change research for both adaptation and mitigation;*
- h. *social issues;*
- i. *forest operations efficiencies and economics;*
- j. *energy efficiency;*
- k. *life cycle assessments;*
- l. *avoidance of illegal logging; and*
- m. *avoidance of controversial sources*

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Membership in various associations and groups promotes forest research to improve the health, productivity and sustainable management of forest resources:

- forest health, productivity, and ecosystem functions;
- water quality;
- wildlife management at stand or landscape levels;
- and conservation of biological diversity

*WCSIC - Western Canada SFI Implementation Committee*

*SOFA - Shuswap Okanagan Forestry Association*

*OIFS - Okanagan Innovative Forestry Society*

*Okanagan-Shuswap Forest District Steering Committee*

*Okanagan-Shuswap Forest District Bark Beetle Committee*

*Okanagan Basin Waterboard – Water Stewardship Committee*

*OSLRMP Implementation and Monitoring Committee*

*OASISS – Okanagan and Similkameen Invasive Species Society*

*COFI - Council of Forest Industries*

*District of Salmon Arm Environmental Management Committee*

*Selkirk Forest District (Columbia Zone) TSA Steering Committee*

*FERIC member- Forest Engineering Research Institute of Canada*

*ILMA – Interior Lumber Manufacturer’s Association*

*CMI member- Columbia Mountains Research Institute*

*RFWS member- Revelstoke Forest Worker Society*

*LINKS member – A local Revelstoke committee that links wildlife researchers together with foresters & other stakeholders*

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In recent years, various projects have supported through cash or in-kind contributions, as well Forest Investment Account Program (FIA) funding to support forest health, productivity, management of forest resources and others interests.

Summaries of all FIA projects are available through the Forest Investment Reporting System (FIRS) data base. OIFS Project summaries are contained in the Okanagan Innovative Forest Practices Agreement Annual Reports and on the OIFS Website ([www.okanagan-ifpa.org](http://www.okanagan-ifpa.org)).

In 2013, cash and in-kind funding is being provided to Dr. Thomas Sullivan to continue his work in understanding the interaction of various forest management practices on small mammal populations. Dr. Sullivan's work in this field over the past 20 years has been instrumental in advancing the knowledge base in this area and has led to revolutionary changes in coarse woody debris, standing tree retention, and riparian management techniques.

**Indicator 2:** *Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols.*

Research on genetically engineered trees is not supported or carried out at this time. No genetically modified trees are registered for use on crown land in BC.

### **Performance Measure 15.2.**

*Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners develop or use state, provincial or regional analyses in support of their sustainable forestry programs.*

**Indicator 1:** *Participation, individually or through cooperative efforts involving SFI Implementation Committees and/or associations at the national, state, provincial, or regional level, in the development or use of some of the following:*

- a. regeneration assessments;*
- b. growth-and-drain assessments;*
- c. best Management Practices implementation and conformance;*
- d. biodiversity conservation information for family forest owners; and*
- e. social, cultural or economic benefit assessments.*

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Company efforts, and associated efforts with the WCSIC and other organizations, ensure that monitoring information is considered for incorporation into the development and use of regional analyses including:

- TSA level TSR input and review including Growth and Yield parameters, Productivity, Site Indices and Vegetative Resource Inventories,
- Site Index Adjustments (SIA) and Change Monitoring Inventory Program for TFL 33
- BMP implementation and compliance using Objectives established through the Land Use Plans and incorporated in the FSPs,
- Wildlife monitoring programs through LINKS (Caribou) and the OIFS (Deer, Marten, Caribou, Wolves),
- Promoting Biodiversity Conservation through the Wood Producer Information Packages.
- Investing in, and maintaining social licence through having an “open door policy” with respect to forest planning, operations and management practices.

### **Performance Measure 15.3.**

*Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners broaden the awareness of climate change impacts on forests, wildlife and biological diversity.*

**Indicator 1:** *Where available, monitor information generated from regional climate models on long-term forest health, productivity and economic viability.*

**Indicator 2:** *Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.*

Information from the WCSIC and other resources will be used to broaden the awareness of climate change and the associated impacts on forests, wildlife and biological diversity.

- WCSIC’s web link to BC climate change information:  
*Adapting BC’s natural resource management to Climate Change*  
<http://www.for.gov.bc.ca/het/climate/index.htm>
- MFLNRO Chief Forester’s Guidance on Tree Species Composition at the Stand and Landscape Level, and

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- BEC & Climate Change  
[http://www.for.gov.bc.ca/hre/becweb/program/climate\\_change/index.html](http://www.for.gov.bc.ca/hre/becweb/program/climate_change/index.html)
- The Columbia Mountain Institute of Applied Ecology  
<http://www.cmiae.org/>

Climate change information is received on a regular basis through a variety of emails, journals, magazines, and other media. Forest professionals attend climate change related courses coordinated by the MFLNRO, FORREX, or other organizations to stay informed on climate related management issues, challenges, and solutions.

### Objective Supporting Information and Records

TFL 33 FIA Program Projects

OIFS (IFPA) FIA Projects, Wood Purchaser Information Package

Climate change related websites listed for performance measure 15.3

### **OBJECTIVE 16. TRAINING AND EDUCATION.**

To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

#### **Performance Measure 16.1.**

*Program Participants* shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2010-2014 Standard*.

**Indicator 1:** *Written statement of commitment to the SFI 2010-2014 Standard communicated throughout the organization, particularly to facility and woodland managers, fiber sourcing staff, and field foresters.*

The Environmental Policy shall be communicated to all Woodlands employees and contractors who shall conduct activities within the direction and intent of the Environmental Policy. The policy is posted in each office and on company websites.

The commitment to the SFI 2010-2014 Standard is stated within this SFMP. This commitment is also circulated as part of the SFI training / awareness sessions conducted with staff and contractors.

Silviculture, road, harvesting, and other contracts contain a provision that the contractor will perform the work in accordance with the EMS and the requirements of the SFI.

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Furthermore, the contract requires the contractor to follow all Standard Operating Procedures and Best Management Practices pertinent to their role or activity.

***Indicator 2: Assignment and understanding of roles and responsibilities for achieving SFI 2010-2014 Standard objectives.***

Roles and responsibilities for achieving the SFI objectives and the EMS are defined in the Structure and Responsibility Section of the EMS manual.

***Indicator 3: Staff education and training sufficient to their roles and responsibilities.***

The EMS manual describes methods put in place to ensure that staff has the required education, training, awareness, and competency to perform their job. These methods are consistent with the WCSIC Training Policy.

***Indicator 4: Contractor education and training sufficient to their roles and responsibilities.***

Contractors that have the potential to significantly impact the environment are required to have EMS awareness training, to comply with SFI standards, and adhere to EMS requirements (*i.e.*, SOP's, Fire Preparedness, Spill Response, etc.).

EMS training includes the SFI Objectives and the commitment to achieve those Objectives. All Contractor training events are documented and records are maintained at each Woodlands office.

Contractors are responsible for training their employees for SFI/EMS requirements and must make staff training documentation available on request.

***Indicator 5: Forestry enterprises shall have a program for the use of certified logging professionals (where available) and qualified logging professionals.***

All contractors are assessed for competency prior to initiating any forest management or related activity. Past performance, personal references, and other relevant information is considered when assessing / determining if a contractor can be considered a "qualified logging professionals".

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### **Performance Measure 16.2.**

*Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to foster improvement in the professionalism of wood producers.*

**Indicators 1:** *Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer's training courses that address:*

- a. awareness of sustainable forestry principles and the SFI Program;*
- b. best Management Practices, including streamside management and road construction, maintenance, and retirement;*
- c. reforestation, invasive exotic plants and animals, , forest resource conservation, aesthetics and special sites;*
- d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat; (e.g. Forests with Exceptional Conservation Value);*
- e. logging safety;*
- f. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws;*
- g. transportation issues;*
- h. business management;*
- i. public policy and outreach; and*
- j. awareness of emerging technologies.*

Membership on the Western Canada SFI Implementation Committee (WCSIC) provides the opportunity to promote, among other things: legal requirements, training, BMP's including streamside management and road construction, maintenance, and retirement (deactivation); reforestation, forest resource conservation, aesthetics and special sites; awareness of responsibilities under the Canadian Species at Risk Act, and other measures to protect wildlife habitat; logging safety; Occupational Safety and Health Regulations, transportation issues; business management; and public policy and outreach and awareness of emerging technologies.

The WCSIC is active in promoting the principles of SFM through advertising in journals and relevant periodicals, as well as providing outreach / extension materials for small woodlands owners/operators on the WCSIC website. The Wood Producers Information Package was also developed by the WCSIC.

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General EMS Training at the company level covers both EMS and SFI requirements. The Training Package delivered to staff and provided to contractors includes information on BMPs (Environmental Field Procedures, or Standard Operating Procedures) as well as guidance for Species at Risk and Invasive Plants. The Wood Producers Information Package also contains the same relevant information.

OH&S, Worksafe BC, and Employment Standards are part of the contractors' safety responsibilities and are specified in harvesting, silviculture, and road contracts. Woodlands staff participate in local roads/logging safety committees which provides a mechanism for relaying and/or receiving safety information, hazards, and preventative measures for consideration / implementation.

**Indicator 2:** *Participation in or support of SFI Implementation Committees to establish criteria for recognition of logger certification programs, where they exist, that include:*

- a. completion of SFI Implementation Committee recognized logger training programs and meeting continuing education requirements of the training program;*
- b. independent in-the-forest verification of conformance with the logger certification program standards;*
- c. compliance with all applicable laws and regulations including responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act and other measures to protect wildlife habitat;*
- d. use of best management practices to protect water quality;*
- e. logging safety;*
- f. compliance with acceptable silviculture and utilization standards;*
- g. aesthetic management techniques employed where applicable; and*
- h. adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.*

The General Awareness Training covers both EMS and SFI. Included in the package are BMP's (Environmental Field Procedures) as well as guidance for threatened & endangered species, culturally important sites and invasive plants.

Membership in WCSIC is current, and participation in the establishing of criteria for recognition of logger certification programs is ongoing. Additional information is contained in The Wood Producer Information Package.

Only logging contractors and road builders that are "Safe Certified" by the BC Forest Safety Council are utilized for forest management activities on licensed tenures.

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**Objective Supporting Information and Records**

EMS and supporting documentation

Wood Purchaser Producer Information Packages

WCSIC Training Policy (September 24, 2010)

[http://www.for.gov.bc.ca/ftp/TPG/external!/publish/SFMS/PGBA-SFI-Training/WCSIC\\_Training\\_Policy\\_Sept\\_24th\\_'10\[1\].pdf](http://www.for.gov.bc.ca/ftp/TPG/external!/publish/SFMS/PGBA-SFI-Training/WCSIC_Training_Policy_Sept_24th_'10[1].pdf)

Western Canada SFI Implementation Committee website

<http://www.wcsic.ca/>

**OBJECTIVE 17. COMMUNITY INVOLVEMENT IN THE PRACTICE OF SUSTAINABLE FORESTRY.**

To broaden the practice of *sustainable forestry* by encouraging the public and *forestry* community to participate in the commitment to *sustainable forestry*, and publicly report progress.

**Performance Measure 17.1.**

*Program Participants* shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation* organizations, indigenous peoples and governments, community groups, sporting organizations, labour, universities, extension agencies, the *American Tree Farm System®* and/or other landowner cooperative programs to apply *principles* of sustainable forest management.

**Indicator 1:** Support, including financial, for efforts of SFI Implementation committees.

Efforts of the SFI Implementation committees are supported through current membership in the WCSIC.

**Indicator 2:** Support for the development of educational materials for use with forest landowners (e.g. information packets, websites, newsletters, workshops, tours, etc.).

The Wood Producer Information package is provided to private landowners during procurement operations with reference to Company websites for further information.

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**Indicator 3:** Support for the development of regional, state or provincial information materials that provide landowners with practical approaches for addressing special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species.

Participation and/or membership with many of the organizations and committees identified for *Objective 15* above, supports the development of measures to protect special sites and biological diversity issues, such as invasive exotic plants and animals, specific wildlife habitat, Forests with Exceptional Conservation Value, and threatened and endangered species.

Further information regarding SFI is available in the SFI Brochure which is available to the public on the WCSIC website at <http://www.wcsic.ca/News/News.php>

**Indicator 4:** Participation in efforts to support or promote conservation of managed forest through voluntary market-based incentive programs such as current-use taxation programs, Forest Legacy Program, or conservation easements.

### GBL/CFP:

GBL and CFP belong to the OIFS and the OSLRMP. The OSLRMP provides the foundation for integrated resource management in the Okanagan TSA. These values include a variety of resource uses and biodiversity including OGMA's, wildlife management, water, etc.

### DTL:

The Results and Strategies in the FSP balance forest resource values such as OGMA's, riparian reserve zones, WTRA's and caribou reserves.

DTL has committed not to operate in the Greeley creek watershed area which is the city of Revelstoke's primary water supply source.

All Woodlands activities are conducted under the supervision of Registered Professional Foresters who belong to the Association of BC Forest Professionals.

**Indicator 5:** Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders and have a program to take into account the results of these efforts in planning.

Each company (in conjunction with government and local stakeholders) has been closely involved with Land Use Planning processes over the past 20 years (i.e. RMAC, KBLUP, OSLRMP). Participation in future regional conservation planning and priority-

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setting efforts such as higher level plans, GAR orders, etc. is necessary to ensure that issues affecting operating areas are fully and properly addressed.

Communications with local and provincial government occurs on a regular basis to ensure that new and emerging issues are known, considered, and incorporated into our planning processes.

### **Performance Measure 17.2.**

*Program Participants* shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.

***Indicator 1: Periodic educational opportunities promoting sustainable forestry, such as***

- a. field tours, seminars, websites, webinars or workshops;*
- b. educational trips;*
- c. self-guided forest management trails;*
- d. publication of articles, educational pamphlets or newsletter; or*
- e. support for state, provincial, and local forestry organizations and soil and water conservation districts.*

The efforts of the WCSIC are supported through maintaining current membership.

Educational opportunities are supported through providing tours and classroom visits – e.g., tours of woodland operations for Vancouver Island University forestry students; mill / woodlands tour for the FPAC sponsored Australia VIP tour.

Company websites contain links and information about sustainable forest management.

Working relationships with various local stakeholder groups are integral to the discussion around sustainable forest management. For example:

- discussions with the Crowfoot Snowmobile Club and Larch Hills Cross Country Ski Club occur on a regular basis in order to ensure recreational activities are considered and accounted for during forest development.
- Support for the Forest Worker's Society helps to promote the concept of sustainable forest management along with hosting the annual Revelstoke logger sports event.
- Participation at the Director level with Okanagan and Similkameen Invasive Species Society (OASISS), and membership of the Okanagan Similkameen Parks Society (OSPS) generates opportunities to discuss sustainable forest management.

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- Partnership and support for research programs (eg, Dr. Tom Sullivan) create synergies with extension and outreach efforts (presentations, kiosks, brochures, etc.).



### Performance Measure 17.3.

*Program Participants* shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other *Program Participants* regarding practices that appear inconsistent with the *SFI Standard principles and objectives*.

**Indicator 1:** Support for SFI Implementation Committees (e.g. toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.

Gormans, Downie, and Canoe are represented by a single membership in the WCSIC. The WCSIC website (<http://www.wcsic.ca/>) provides contact information for the public or stakeholders who suspect non-conforming practices by a WCSIC member and who wish to make a complaint. The WCSIC procedure for addressing allegations of SFI program non-conformance is posted on their website.

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**Indicator 2:** Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.

The EMS provides a mechanism for addressing public inquiries about sustainable forest management. Public concerns or questions regarding forestry operations are vetted through the Woods Manager or designate at each office. Records of any discussions are kept in accordance with EMS procedures and are reviewed at the Annual Management Review Meeting. Copies of complaints received are forwarded to WCSIC and reviewed with the surveillance/registration auditing company.

Our “open door” policy allows the public to speak directly to staff at any time during the forest management cycle. Staff will address or record any concerns and follow up with a written response in accordance to EMS procedures.

The public can also submit comments and concerns through linkages posted on the Company websites.

*If the program participant has received in writing and in sufficient detail a specific claim of non-conformity by a complainant, the program participant shall, **within 45 days** of the complaint, respond to the complainant and forward a copy of the complaint and its response to the registrar for future review via the surveillance or certification audits.*

### Objective Supporting Information and Records

Public Correspondence Records, Annual Audits

## OBJECTIVE 18: PUBLIC LAND MANAGEMENT RESPONSIBILITIES.

To promote and implement sustainable forest management on *public lands*.

### Performance Measure 18.1.

*Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.*

**Indicator 1:** Involvement in public land planning and management activities with appropriate governmental entities and the public.

Participation in relevant land use planning processes and implementation committees such as the OSLRMP, RMAC, and KBHLP plans is ongoing. Updates / amendments to

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these plans occur on an as-needed basis – e.g., the recent Ungulate Winter Range and Caribou GAR Orders and amendments to the RHLPO.

Annual updates to the FSPs are referred to stakeholders, the public, and other groups to provide the opportunity to comment on the location / scale / extent of planned forest management activities.

**Indicator 2:** *Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.*

The FSPs are available to local interest groups, agencies and the public during review and comment periods, as well as on Company websites. Specific Site Plans are available for review upon request.

Joint forums with government, industry and stakeholders occur on an *ad hoc* basis throughout the year, and are typically focused on a specific development, watershed issue, or recreational feature.

Special applications are advertised in local newspapers to notify local stakeholders and interested persons the opportunity to provide comment. The “open door” policy at each Woodlands office provides opportunity for the public to speak directly to forestry staff concerning forest management issues.

### **Performance Measure 18.2.**

*Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.*

**Indicator 1:** *Program that includes communicating with affected indigenous peoples to enable Program Participants to:*

- a) understand and respect traditional forestry related knowledge;*
- b) identify and protect spiritually, historically, or culturally important sites, and*
- c) address the sustainable use of non-timber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.*

Annual notification / referral of forest development activities (harvesting/road construction plans etc.) is provided to affected First Nations Bands for information sharing purposes. The MFLNRO carries out First Nation consultations as part of their mandate.

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Several First Nations are entering into “fee for service” agreements whereby TUS, CHR and PFR archaeological assessments are conducted on specific cutblocks or proposed road locations. These locations are selected in response to FSP referrals.

The results from archaeological assessments such as preliminary field reconnaissance (PFR) or archaeological impact assessments (AIA), which are regulated under the Heritage Conservation Act will be provided to affected First Nations.

Other information regarding Traditional Use or Cultural Heritage Resources is shared through ongoing company-specific communications, or coordinated efforts such as those of the OIFS.



### ***Objective Supporting Information and Records***

FSP, Public Correspondence Records, OIFS

### **OBJECTIVE 19. COMMUNICATIONS AND PUBLIC REPORTING.**

To broaden the practice of *sustainable forestry* by documenting progress and opportunities for improvement.

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### **Performance Measure 19.1.**

A *Certified Program Participant* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2010-2014 Standard*

**Indicator 1:** *The summary audit report submitted by the Program Participant (one copy must be in English) shall include, at a minimum,*

- a. a description of the audit process, objectives and scope;*
- b. a description of substitute indicators, if any, used in the audit and a rationale for each;*
- c. the name of the Program Participant that was audited, including its SFI representative;*
- d. a general description of the Program Participant's forestland and manufacturing operations included in the audit;*
- e. the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Program Participant);*
- f. the dates the certification was conducted and completed;*
- g. a summary of the findings, including general descriptions of evidence of conformity and any non-conformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and*
- h. the certification decision.*

Internal audits are conducted as required as part of the EMS Program. External audits of the SFI standard are conducted by certified auditors (registrars) to confirm that the SFI Standard is being met. Audit reports are reviewed internally, then submitted to SFI, who then post the reports on their public website (<http://www.sfiprogram.org/>). An annual audit summary will be posted on the company websites.

### **Performance Measure 19.2.**

*Program Participants* shall report annually to *SFI Inc.* on their conformance with the *SFI 2010-2014 Standard*.

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**Indicator 1:** Prompt response to the SFI annual progress report.

The information for the SFI Annual Progress Report will be submitted prior to the specified deadline.

**Indicator 2:** Record keeping for all the categories of information needed for SFI annual progress reports.

The EMS program specifies procedures for record keeping.

**Indicator 3:** Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI 2010-2014 Standard.

Past reports will be retained by the Company. The EMS identifies where the reports will be kept, the format, and the duration of storage. The first reporting period for this 'multi-site' certification will be for the 2013 calendar year.



### **Objective Supporting Information and Records**

Audit Reports, SFI Progress Reports

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### **OBJECTIVE 20. MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT.**

To promote continual improvement in the practice of *sustainable forestry*, and to monitor, measure and report performance in achieving the commitment to *sustainable forestry*.

#### **Performance Measure 20.1.**

*Program Participants* shall establish a management review system to examine findings and progress in implementing the *SFI Standard*, to make appropriate improvements in *programs*, and to inform their employees of changes.

**Indicator 1:** *A system to review commitments, programs and procedures to evaluate effectiveness.*

Refer to Indicator 3, below.

**Indicator 2:** *A system for collecting, reviewing and reporting information to management regarding progress in achieving SFI 2010-2014 Standard objectives and Performance Measures.*

Refer to Indicator 3, below.

**Indicator 3:** *Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2010-2014 Standard.*

A Management Review of the EMS and SFI Program to assess the conformance and performance of the Program against the SFI standard will be conducted on at least an annual basis. The purpose of the review is to confirm that:

- The EMS and SFMP continues to be suitable, effective and adequate
- Appropriate direction and resources are provided
- The EMS and SFMP will achieve continual improvement in environmental performance and sustainable forest management

Areas requiring improvement are identified, and corrective actions will be identified and implemented within a specified timeframe.

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***Objective Supporting Information and Records***

GGoC SFMP

GGoC EMS

Annual Management Review Meeting Agenda/Minutes

- end -