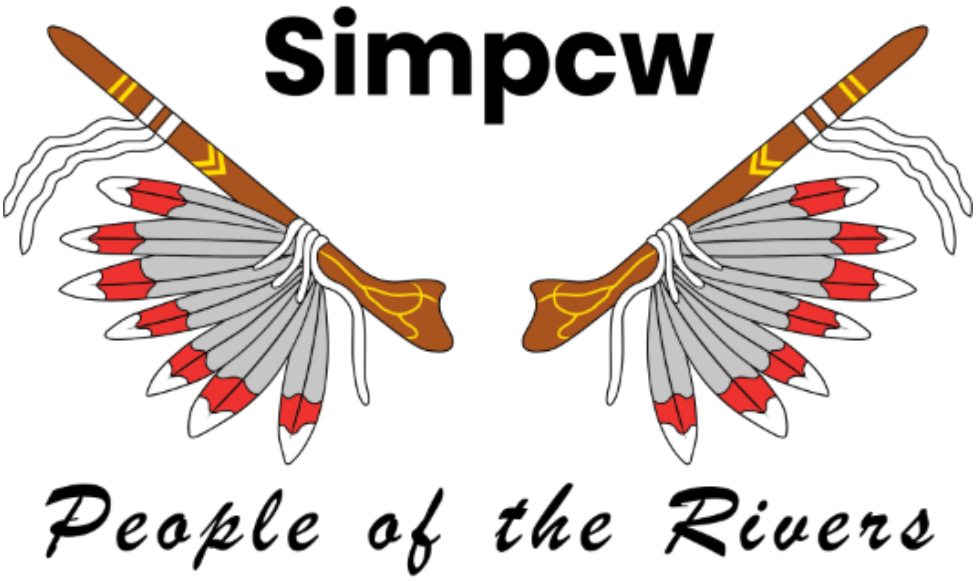

SIMPCW

INTERIM STEWARDSHIP PLAN

Includes Amendments	Effective Date
Amendment No. 1	May 22, 2024

Adopted by Simpcw Chief and Council
September 05, 2023

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Preparing Forester

I certify that the work herein has been carried out to the standards expected of a registrant of Forest Professionals British Columbia.

J. Dan Roberts, RPF 3245

ACKNOWLEDGEMENTS

Contributions were made to the technical aspects of this plan by Sam Phillips RPF 3910 and Glenn Foss RFT 0282.

Thank you to the following Staff and Contractors at the Simpcw Natural Resources Department who reviewed and contributed to this plan:

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- Kerri Jo Fortier, Natural Resources Manager
- Marie Matthew, Contractor
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- Nathan Matthew, Contractor
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SECWEPEMCTSÍN TRANSLATIONS

C7ístkteṉ – Winter homes

Ckwnémten – Cultural uses

Ctswenétkwe - Drying Fish River

Ctswen – Drying fish

Kekésu7 – Spring salmon

Melámen – Medicine

Nekéct - Forest

Qelmúcw – Person or Indigenous person, depending on the speaker

Secwépemc – Shuswap people

Secwepemcúl̓ecw – Secwépemc territory

Séwllkwe – Waters

Símpcwemc – Simpcw people

Simpcwúl̓ecw – Simpcw territory

Scúcwep – Western screech owl

Skeḿcís – Grizzly bear

Sníne - Owl

Spel̓qwéqs – Bald eagle

Sqlelten7úẃl – Sockeye salmon

Stsiqllcw – Animal den or burrow

Stsq̓eý - Law or paper

Teníye – Moose

Tknémentem – Preserve the Land, a Simpcw Principle

Tḱwenemíple7ten – Provide Law, rules, a Simpcw Principle

Tmesmescén' – Wildlife

Tmicw – Land

Tseqwqíṉ – Woodpecker

Tṡi7 – deer

Tsícwtṡecw – Osprey

Tsrep – Tree

Tsreprép - Plural version of trees

Xyemstém re Tmicw – Respect the Earth, a Simpcw Principle

Yecwemínmen – Guardians of the Land

Yecwmenúl̓ecw – Take Care of The Land, A Simpcw Principle

TECHNICAL DEFINITIONS

Active Fluvial Unit - That portion of a floodplain over which water can be expected to flow during a runoff event of magnitude 1 in 100 years, and that portion of an alluvial fan on which there is evidence of hydro-geomorphic processes, active within at least 100 years on average.

B.C. Conservation Data Centre (CDC) – An organization that assists in the conservation of our province's biodiversity by collecting and sharing scientific data and information about wildlife and ecosystems in B.C.

Biogeoclimatic Ecosystems Classification (BEC) – A system used widely in B.C. to classify ecosystems by vegetation, soils, climate, and topography.

Community Watershed – A watershed legally designated by the B.C. Government, where water is diverted for human consumption by a licensed waterworks. The primary purpose of the designation is to identify the area for special management to protect water quality, quantity, and timing of flow.

Critical Deer Winter Range – An area legally designated by the B.C. Government that contains habitat necessary to meet the winter habitat requirements of deer. The primary purpose of the designation is to identify the area for special management that ensures thermal cover and forage is maintained.

Critical Moose Winter Range – An area legally designated by the B.C. Government that contains habitat necessary to meet the winter habitat requirements of moose. The primary purpose of the designation is to identify the area for special management that ensures thermal cover, visual cover and forage is maintained.

Cultural Heritage Resource (CHR) - An object, a site or the location of a traditional societal practice that is of historical, cultural, or archaeological significance to British Columbia, a community, or an Aboriginal people.

Enhanced Riparian Management Zone (ERMZ) – Riparian management zones established by Simpcw to support the goals of protecting and conserving riparian habitat and to ensure that Simpcw rights, interests and values related to riparian areas are adequately protected. Simpcw has identified priority streams. A 100-meter wide ERMZ applies to these streams. A 100-meter wide ERMZ applies to all wetlands greater than 0.9 hectares in area. A 200-meter wide ERMZ applies to all lakes. Minimum tree retention requirements within these ERMZs are specified in the plan.

Fisheries Sensitive Watershed (FSW) – A watershed legally designated by order of the B.C. Government because of its significant fisheries values and watershed sensitivity, for which legal objectives are specified. Forest licensees must establish results and strategies in their Forest Stewardship Plans consistent with the objectives.

Forest Act – The B.C. Government Act that legally establishes: how forests are classification and managed; the disposition of timber by the Government; general forest tenure provisions; timber marking; timber scaling, stumpage etc.

Forest licensees – Holders of Forest Act agreements that provide the right to harvest a set volume of Crown timber within either a Timber Supply Area or a fixed area such as a Tree Farm Licence, First Nations Woodland Tenure, Community Forest, or Woodlot. Along with harvest rights, forest licencees have significant forest management responsibilities including forest protection, operational planning, road building, and reforestation.

Forest and Range Evaluation Program (FREP) - Measures the effectiveness of forest and range practices by monitoring and evaluating the condition of eleven resource values.

Forest and Range Practices Act (FRPA) – FRPA regulates how all forest and range practices and resource-based activities are to be conducted on Crown land. It also applies to private land associated with woodlots licences and tree farm licences.

Forest Planning and Practices Regulation (FPPR) - FPPR establishes the FRPA practice requirements or rules for timber harvesting, road building and reforestation activities.

Forest Professionals British Columbia (FPBC) – The registering and regulating body for British Columbia's professional foresters and forest technologists.

Forest Stewardship Plan (FSP) – A FSP specifies the results and strategies an agreement holder commits to achieving or carrying out to address legal objectives the B.C. Government has established for eleven resource values. A FSP also specifies measures to protect against invasive plants and to maintain natural range barriers.

FPPR Riparian Class – B.C. Government classifications of riparian features established in sections 47 to 49 of FPPR. These classifications are generally based on width and fish presence for streams, and area for wetlands and lakes.

FPPR Riparian Management Zone (RMZ) – Management zones established by the B.C. Government in FPPR sections 47 to 49 and applied to FPPR riparian class features. RMZs are established for the purpose of identifying sensitive riparian areas that require some level of tree retention and specified activities are limited or restricted.

FPPR Riparian Reserve Zone (RRZ) – Reserve zones established by the B.C. Government in FPPR sections 47 to 49 and applied to FPPR riparian class features. RRZs are established for the purpose of identifying sensitive riparian areas where tree removal and specified activities are restricted.

General Wildlife Measures (GWM) – A measure specified by the B.C. Government in a Government Actions Regulation (GAR) Order, that are necessary to protect and conserve specified wildlife habitat.

Government Actions Regulation (GAR) - A FRPA regulation that is the legal mechanism for the B.C. Government to establish land designations or stewardship measures for forest and range values.

Heritage Conservation Act (HCA) – B.C. legislation which has the purpose to encourage and facilitate the protection and conservation of heritage property in British Columbia.

Indigenous Protected and Conserved Area (IPCA) - an area declared by an Indigenous government where that government holds the primary role of protecting and conserving ecosystems, through Indigenous laws, governance, and knowledge systems.

Kamloops Higher Level Plan Order (KHLPO) – A 2009 B.C. Government Land Act section 93.4 Ministerial Order which establishes legal objectives derived from the Kamloops Land and Resources Management Plan. Subsequent amendments have been made to this Order.

Kamloops Land and Resource Management Plan - A sub-regional land-use plan declared in 1996 that provides management strategies for identified landscape values.

Timber Supply Area (TSA) – A primary unit of area the B.C. Government designates for the purpose of determining a level of timber harvest.

Landscape Units - Areas of land and water legally designated by the B.C. Government for long-term planning of resource management activities.

Old Growth Management Areas (OGMAs) – Spatially identified areas or stands of forest on the landscape that contain, or are managed to attain, the structural old growth forest attributes defined in a B.C. Government Ministerial Order.

Old Growth Strategic Review (OGSR) – A 2019 province-wide review of old growth undertaken by independent panel reporting to the B.C. Government, with the purpose of informing the development of new old growth forest management policies and strategies.

Old Growth Technical Advisory Panel (OGTAP) – A panel formed by the B.C. Government in response to the OGSR recommendations, to develop old forest deferral recommendations.

Priority Streams – Streams identified by Simpcw for which an Enhanced Riparian Management Zone (ERMZ) standard or practice will apply.

Qualified Professional – A member of a professional association, registered and in good standing whose training, ability and experience makes the member professionally competent in the relevant area of practice

Watershed Assessment – Identification and analysis or hydrologic and geomorphic processes in a watershed unit.

Watershed Risk Management Framework (WRMF) – A framework developed internally by Forest Licensees that identifies Values at Risk (including Simpcw Directives) within a watershed, estimates level of Risk to those Values, and evaluates those levels with a defined Risk Tolerance. The framework will identify when a Watershed Assessment is needed.

Wildlife Connectivity Corridor – Areas designated by Simpcw within this plan that will be managed to mitigate impacts to wildlife that are the result of habitat fragmentation and contribute to maintaining habitat connectivity for a broad range of species.

Wildlife Habitat Areas (WHA)- Mapped areas that are necessary to meet the habitat requirements of an Identified Wildlife element. WHAs designate critical habitats in which activities are managed to limit their impact on the Identified Wildlife element for which the area was established. The purpose of WHAs is to conserve those habitats considered most limiting to a given Identified Wildlife element.

Wildlife Habitat Feature (WHF) – A concept established in FPPR, which provides for identification of a WHF through the Government Actions Regulation, and requires that they not be damaged or rendered ineffective through a primary forest activity.

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1 PREAMBLE

Simpcw is one of 17 Secwépemc Nation members. As part of the Secwépemc Nation, the Simpcw people have unextinguished Aboriginal Title and Rights to the land and resources in our area of responsibility, Simpcwúĺecw (Simpcw Territory), which is within Secwepemcúĺecw (Secwépemc territory). This title and these rights are affirmed in Section 35 (1) of the Canadian Constitution, several Supreme Court of Canada decisions such as Delgamuucw, Haida and Tsilhqot'in and most recently by the acceptance by Canada and British Columbia of the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP).

The Secwépemc occupy approximately 18 million hectares of the south-central interior of British Columbia – land known as Secwepemcúĺecw. Within Secwepemcúĺecw is Simpcwúĺecw, the land of the Simpcw people, which encompasses 5 million hectares. Simpcwúĺecw (Figure 1) is the single largest Secwépemc territory.

The northern extent of Simpcwúĺecw encompasses Kakwa Provincial Park and the Robson Valley. From there it moves east through the Rocky Mountains to Jasper and the Athabasca River, then south and west through the Columbia River Valley and Upper Adams Lake to the southern extent at McLure on the North Thompson River. Simpcwúĺecw then extends north through Bridge Lake, the Cariboo Mountains, Bowron Lakes, and back to Kakwa Park. Within this territory are many large rivers, including the North Thompson, Fraser, Athabasca, Columbia, Holmes (Beaver), Goat, McGregor, Clearwater, Adams, Raft, Barriere, and Raush, as well as the Snaring and Snake Indian Rivers, both of which are named for Símpcwemc (Simpcw people).[1] Significant lakes within Simpcwúĺecw include Clearwater, Hobson, Azure, Murtle, Mitchell, Isaac, Kinbasket, Adams, Bonaparte, and Mahood. Parks within Simpcwúĺecw include Jasper National Park, and B.C. provincial parks such as Wells Gray, Cariboo Mountains, Bowron Lake, Kakwa, Mount Robson, Dunn Peak, Bonaparte, Chu Chua Cottonwood, and North Thompson.

Símpcwemc have thrived in Simpcwúĺecw since time immemorial. The tmicw (land), tmesmescén (wildlife), and séwllkwe (waters) sustained us as we practiced seasonal rounds for harvesting food and resources. By combining a deep understanding of the familiar rhythms of the earth with a worldview that embraced our role as yecwemínmen (guardians of the land), our approach assured the health and wellbeing of the tmicw (land), tmesmescén (wildlife), séwllkwe (waters), and qelmúcw (people).

Since the 1980's, evidence of Símpcwemc use and occupancy has been collected from Simpcw Elders and Knowledge Keepers. The outcome is a highly consistent retelling of the intimate relationship between Símpcwemc and the tmicw (land), tmesmescén (wildlife), and séwllkwe (waters). These histories, when combined with archival, archaeological, and ethnographic records created by explorers, settlers, researchers, surveyors, and others, reflect a clear picture of Símpcwemc presence and guardianship across the whole of Simpcwúĺecw.

[1] The Snaring and Snake Indian names are derived from other First Nations when referring to Simpcwemc. These names were shared to early explorers before they encountered Simpcwemc, informing their references to Simpcw.

Stsq̓eý (laws) have evolved through the telling and retelling of slexéy̓em (stories) and continue to evolve today. Stsq̓eý (laws) address all aspects of life and form the foundation of the Secwépemc Worldview. Over time we have developed Simpcw Principles which distill the lessons contained within slexéy̓em(stories) and stsq̓eý (laws). The Simpcw Principles presented in this document are those which pertain to the natural world and lay the foundation for our role as yecwemínmen (guardians of the land).

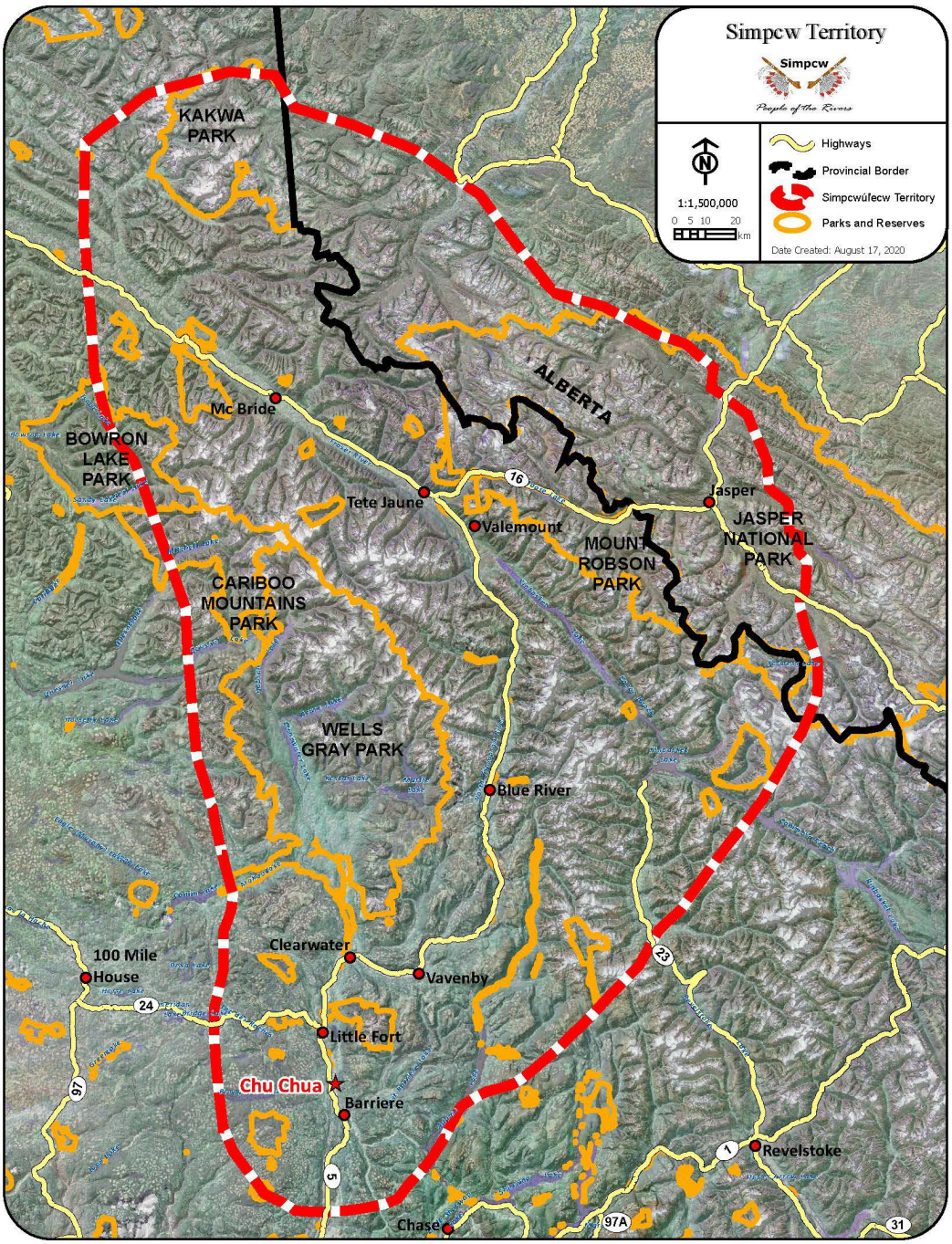

Figure 1 Simpcwúl̓ecw

2 PURPOSE OF THE PLAN

The purpose of the Simpcw Interim Stewardship Plan is to define expectations for natural resource activities within Simpcwúl̓ecw. This plan is an exercise of Simpcw Title and Rights in our area of responsibility within Secwepemcúl̓ecw. It provides a framework to ensure that resource users honour our stsq̓eý (laws) while conducting their activities.

The Simpcw Interim Stewardship Plan establishes Standards of Practice (SOP) which govern how natural resource activities are performed to ensure the continued health and wellbeing of the tmicw (land), tmesmescén (wildlife), séwllkwe (waters), and qelmúcw (people) from a Simpcw perspective. Standards of Practice provide us the opportunity to share with proponents and industry how the land must be respected and protected; they are the practical application of the values centred within the Simpcw Directives. The Directives focus the Simpcw Principles – distilled from slexéy̓em (stories) and stsq̓eý (laws) which have been passed down from time immemorial – as they apply to our guardianship of the tmicw (land), tmesmescén (wildlife), séwllkwe (waters), and qelmúcw (people).

This plan builds upon existing requirements and commitments – such as legislated requirements established within the Forest and Range Practices Act (FRPA), or those legal management commitments specified by Forest Licensees in their approved Forest Stewardship Plans (FSPs) – by specifying additional Standards of Practice that will provide an enhanced level of stewardship, with a Simpcw focus. This plan ensures guardianship of Simpcwúl̓ecw in the interim while Simpcw develops a community-driven territorial stewardship plan which will: provide a long-range vision for how Simpcwúl̓ecw is used and protected; spatialize the Simpcw Directives across all Simpcwúl̓ecw; and establish land use designations and policies.

This plan is consistent with the broad range of collective and individual rights of Indigenous peoples affirmed and set out within the United Nations' Declaration on the Rights of Indigenous Peoples (UNDRIP). The plan is supported by but not limited to UNDRIP Articles 26 and 29.

Article 26

1. *Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.*
2. *Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.*
3. *States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.*

Article 29

Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources.

3 PLAN TRIAL AREA: RAFT LANDSCAPE UNIT

As described in the Landscape Unit Planning Guide, the B.C. Government legally designates Landscape Units as "areas of land and water for long-term planning of resource management activities with an initial priority for biodiversity conservation."[2] The Raft Landscape Unit was designated through Land Act section 93.4 Ministerial Order, *Old Growth Management Objectives for the Kamloops LRMP Area*.[3] The Raft Landscape Unit is 76,942 hectares in area and primarily compasses the Raft River Large Watershed, within which are nested smaller watershed units such as the Filter Creek, Stratton Creek, Richie Creek, Kowalski Creek, Upper Raft River, South Maxwell Creek, North Maxwell Creek and West Raft River watersheds.

The Raft Landscape Unit is the first area within Simpcwúl̓ecw where the Standards of Practice specified in this plan will be applied and assessed. Integral to these Standards of Practice are two new and unique features which have been established and spatialized by Simpcw: Priority Stream Enhanced Riparian Management Zones (ERMZs) and Wildlife Connectivity Corridors. Simpcw has also applied the concept of ERMZs to wetlands and lakes, but the management specified for wetland and lake ERMZ's will be applied to these riparian features that are encountered in the field.

The Raft Landscape Unit was chosen as a trial area for the Interim Stewardship Plan for three reasons. First, this area is representative of the diverse features that are found throughout Simpcwúl̓ecw. Second, it was and remains a Landscape Unit with a high level of resource extraction activity and as a result is broadly mapped. Third, it is an area of historical and contemporary cultural significance to Símpcwemc.

The Raft River has long been an important area to Símpcwemc. Archaeological research confirms what oral histories tell us that Símpcwemc once lived year-round near the fishing sites along the Raft River. Recorded archaeological sites along the river include evidence of c7ístkteṅ (winter homes), cache and cooking pits, and stone tools, which date back to the pre-contact era. Elders interviewed over the last four decades have repeatedly recounted their, and their parents and grandparents, knowledge of these areas.

Elders have consistently affirmed that in August of each year, Símpcwemc families made their way to the lower regions of Raft River (from the mouth of the river up to the falls), where they set up camp and harvested the sqlelten7úẇl (sockeye) and kekésu7 (spring) salmon as they came upstream to spawn. The fish harvested by gaffs or spears were hung on drying racks so that they were preserved for winter use (Figure 2, below). Accordingly, the river was named Ctswenétkwe in Secwepemctsín, meaning "drying fish river" and is generally now referred to as Ctswen, or "dried fish." Elders recall stories of battles waged to defend this critical river.

[2] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/policies-guides/lup_guide.pdf

[3] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/thompsonokanagan-region/kamloops-lrmp/kamloops_lrmp_luor_18apr2013.pdf

Interviewed Elders describe how fishing the Raft was followed by, or concurrent with, hunting and berry-gathering trips to the Raft River watershed. Hunters harvested extensively in the mountains securing "caribou, mountain sheep, deer, bear, [and] whistlers."[4] Other elders confirm that hunting in the Raft Peaks was a regular practice that afforded a reliable supply of dried meat for the winter. [21] Berries gathered in the valley and higher elevations included speqpeq7úẇi (saskatoons), sxúsem (soapberries), wenéx (huckleberries), sesép (blueberries), and tqítḏe (strawberries), most of which were preserved for winter.

The significance of Raft River to Símpcwemc has not diminished over time despite changes that have restricted Simpcw access to the river and prohibited us from exercising our right to fish here. Life at Ctswen remains vivid in the memories of our people, to the extent that our strong community commitment to regain a presence here has resulted in the development of cooperative salmon enhancement and re-stocking programs between Simpcw and Department of Fisheries and Oceans (DFO), the re-establishment of the Simpcw First Nation First Fish Ceremony and the purchase by Simpcw First Nation of the DFO compound and a parcel to the south-west of this site.[5]

Figure 2 Fish drying rack at Raft River. Photograph circa late 19th century.

[4] Simpcw First Nation, Simpcw First Nation Archives, Simpcw Informant, #278, ANTRAN Volume II: 27.
[5] Simpcw First Nation, Simpcw First Nation Archives, see Simpcw Informant, #305, ANTRAN Volume I: 87, Simpcw Informants, #356 & #357, *ANTRAN Volume I*: 121, Simpcw Informants, #363 & #407, *ANTRAN Volume I.,*169f, Simpcw Informant, #363, *ANTRAN Volume*: 137, and Simpcw Informant, #264, *CHP:*38.

Figure 3 Símpcwemc Fishing at Raft River. Photograph from Summer 2022.

4 SIMPCW PRINCIPLES

Simpcw Principles distill lessons contained within slexéy̓em (stories) and stsq̓eý (laws) and lay the foundation for our role as yecwemínmen (guardians of the land). Simpcw Principles which apply to the natural world include:

- Yecwmenúl̓ecw – Take Care of the Tmicw (Land)
    - Enable collaborative, inclusive, and meaningful participation from the Community in establishing policy directives for decisions regarding natural resources.
- Tknémentem – Preserve the Tmicw (Land)
    - Establish protection for areas deemed sensitive or valuable to Simpcw culture, health, food security and economic prosperity.
    - Identify implementation methods to protect sensitive areas and ensure health of the tmicw (land).
- Xyemstém re Tmicw – Respect the Earth
    - identify priorities and perspectives related to potential development within Simpcwúl̓ecw.

5 SIMPCW DIRECTIVES

Simpcw Directives provide a framework to implement the Simpcw Principles which apply to the natural world. The Directives ensure the health and wellbeing of the tmicw (land), tmesmescén (wildlife), séwllkwe (waters), and qelmúcw (people). These Directives are:

- Séwllkwe (Water)
- Ckwnémten (Cultural Uses)
- Melámen (Medicine), Plants, and Tsreprép (Trees)
- Tmesmescéɲ (Wildlife)
- Archaeological Sites
- Símpcwemc (Simpcw People)

Standards of Practice (SOP) have been developed to provide guidance to proponents and industry in the application of the Simpcw Directives. These SOP govern how the tmicw (land) must be respected and protected by those engaging in natural resource activities in Simpcwúl̓ecw.

This plan discusses the six Simpcw Directives, highlights the relevant context for the application of each Directive, and introduces Simpcw Standards of Practice that will be met to ensure the protection and health of the tmicw (land), tmesmescén (wildlife), séwllkwe (waters), and qelmúcw (people).

5.1 SIMPCW DIRECTIVE – SÉWLLKWE (WATER)

Simpcw Directives identify the following goals and priorities related to Water:

- Protect traditional fishing spots and enhance fish habitat;
- Prioritize slope stability and riparian areas as well as an overall aquatic ecosystem protection practice; and
- Consider community watersheds and downstream effects.

These goals and priorities apply to all water and riparian areas (rivers, streams, lakes, and wetlands) throughout Simpcwúl̓ecw (Simpcw Territory).

To achieve these goals, Simpcw specifies forest development practice standards for the management of:

- Sediment and stream channels;
- Watershed level cumulative effects; and
- Riparian areas.

5.1.1 Context – Management of Sediment and Stream Channels

It is well understood that industrial practices on the landscape – such as forestry, mining, and ranching – are a source of stream sedimentation and can contribute to stream channel instability. Roads in particular, can be a chronic source of sediment to streams and fish habitat.

Forest Stewardship Plan holders within the Thompson Rivers Forest District have developed strategies to address objectives for areas designated as Fisheries Sensitive Watersheds by the B.C. Government. These strategies include the following Fisheries Sensitive Watershed Assessment Protocols as well as guidance focused on maintaining stream channel stability and riparian function, and minimizing adverse sediment-related effects to fish:

- Active Fluvial Unit – Assessment Steps and Best Management Practice
- Active Fluvial Unit Assessment Steps – Cutblock
- Active Fluvial Unit Assessment Steps – Road
- Fisheries Sensitive Watershed Active Fluvial Unit Guidance
- Sediment Generation and Delivery – Assessment Steps and Best Management Practices
- Sediment Generation and Delivery Assessment Flow Chart
- Fisheries Sensitive Watershed Sediment Mitigation Assessment Guidance
- Sediment Mitigation Assessment

5.1.2 Simpcw Standards of Practice – Management of Sediment and Stream Channels

Within Simpcwúlecw, forest licensees and other natural resource users will:

1) Apply the Fisheries Sensitive Watershed Assessment Protocols developed by Thompson Rivers Forest District Forest Stewardship Plan holders to all watersheds when planning and developing cutblocks and roads.
2) Conduct forest operations consistent with erosion and sediment control best management practices, such as those presented in:
    a) *FP Innovations, 2007. Erosion and Sediment Control for Forest Roads and Stream Crossings: A Practical Guide;*[6] and
    b) *BC Timber Sales, Kamloops Business Area, undated. Sediment and Erosion Control Field Guide.*[7]

5.1.3 Context – Watershed Management and Cumulative Effects

Human activities, including forest and range practices, have the potential to affect water quality, water quantity, and timing of water flow. Forest and range practices can negatively impact values such as clean water required by fish and humans, riparian structure and habitat, infrastructure (such as roads and water intakes), and private property.

Responsible forest management at a watershed level requires that the combined effects of all types of land uses that impact water over time be considered.

[6] https://library.fpinnovations.ca/media/FOP/ADV9N5.PDF
[7] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/ems-sfm-certification/business-area/kamloops/tka-sediment-and-erosion-control-field-guide.pdf

B.C. Government legal watershed stewardship objectives are established and apply only to designated Community Watersheds and Fisheries Sensitive Watersheds. These stewardship objectives are addressed by strategies specified in Forest Stewardship Plans held by forest licensees.

The B.C. Government has not established a legal requirement for forest licensees to assess the cumulative effects to watershed processes such as stream flow, water quality, and riparian function that have been caused by human land use activities and natural processes. These changes to watershed processes have a real potential to compromise the ability for Simpcw to care for the tmicw (land) and exercise cultural rights.

The Forest Professionals British Columbia (FPBC) *Bylaw 9 – Standard of Ethical and Professional Conduct* requires that Forest Professionals uphold forest stewardship and practice the responsible use of forest resources. Forest Professionals must conduct themselves in accordance with the *Code of Ethical and Professional Conduct*, including compliance with specified standards of practice. Responsible use of forest resources includes managing hydrologic and geomorphic risks to watershed values that have resulted from cumulative effects.

In 2020, the FPBC and Engineers & Geoscientists British Columbia, through their Joint Practices Board, published what is commonly referred to as the *Watershed Assessment Joint Professional Practice Guidelines.*[8] This document establishes guidelines and standards of practice for association members who carry out Watershed Assessments, and those members who require or use Watershed Assessments to meet their legal and non-statutory stewardship requirements.

The *Watershed Assessment Joint Professional Practice Guidelines* sets the standard of practice for Forest Professionals who are responsible for managing hydrologic and geomorphic risks to values in a watershed. The guidelines require that a Watershed Risk Management Framework (WRMF) be developed which:

1) Defines roles and responsibilities, and how and where it will be applied.
2) Specifies Values at Risk (Risk Elements) in the watershed, such as fish and fish habitat, cultural values, archaeological sites, water quality and supply, human safety, riparian function, ecology, and infrastructure.
3) Defines the steps of a watershed risk assessment:
    a) Risk Identification involves identifying and describing sources of Risk and the potential Consequences (Forest Professionals and Hydrology Specialists);
    b) Risk Analysis estimates the level of Risk, typically as an expression of the severity of the Consequence combined with Likelihood of occurrence (Forest Professionals and Hydrology Specialists); and
    c) Risk Evaluation compares the Risk levels estimated in a Risk Analysis with the Risk Tolerance Criteria (Forest Professionals).
4) Requires that measures to avoid, limit, or reduce Risk (Risk treatment) be identified (Forest Professionals with Hydrology Specialist input).

[8] *This document is formally published as the Watershed Assessment and Management of Hydrologic and Geomorphic Risk in the Forest Sector V 1.0*

5) Provides for internal and external communication with First Nations, government, and non-government stakeholders.
6) Includes a monitoring and review process to assess the effectiveness of the system.

5.1.4 Simpcw Standards of Practice – Watershed Management and Cumulative Effects

Within Simpcwúl̓ecw, forest licensees will:

1) Develop and employ a Watershed Risk Management Framework that identifies risk to Simpcw Directives where they are present within a subject watershed.
2) Conduct watershed assessments within Simpcwúl̓ecw where the framework indicates, and where forest development activities are proposed.
3) Communicate to Simpcw the results of any Watershed Assessment where risk to a Simpcw Directive is identified and assigned a risk rating of moderate or greater, and the forest licensee proposes to proceed with forest development.

5.1.5 Context – Tree Retention within Riparian Management Zones

Protection and conservation of fish, fish habitat, wildlife habitat, biodiversity, cultural and water values within riparian areas is of utmost importance to Simpcw.

Simpcw acknowledges that forest licensees are required to specify Riparian Management Zone (RMZ) tree retention standards in *Forest and Range Practices Act* (FRPA) Forest Stewardship Plans. However, Simpcw believes that the proportion of tree retention within FRPA RMZs must be expanded beyond current forest industry standards so that adequate riparian protection and conservation is ensured.

Two current publications support the need for increased riparian area tree retention. The first publication, *Forest and Range Evaluation Program (FREP) Extension Note #39*[9] reported on the results of 2287 stream and riparian condition assessments conducted from 2005 to 2014. The report indicates that about 2/3 of the streams assessed were properly functioning or functioning at risk, while 1/3 of the streams were functioning at high risk or not properly functioning. While not all the function issues were forestry related (livestock or natural factors contribute), stream function was found to be impacted most significantly by tree falling and yarding, wind throw, and low riparian tree retention. Forest Planning and Practices Regulation (FPPR) S5 and S6 classes (non fish-bearing streams) and the FPPR S4 class (smallest fish-bearing streams) were most frequently impacted. The report presents opportunities for improved riparian management, which are reflected as Simpcw Standards of Practice in this plan.[10]

[9] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/frep/extension-notes/frep_extension_note_39.pdf
[10] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/frep/extension-notes/frep_extension_note_39.pdf

The second publication*, Forestry Influences on Salmonid Habitat in the North Thompson River Watershed, British Columbia*[11] is directly applicable to streams within Simpcwúl̓ecw. This article draws attention to several key observations: temperature increases associated with forest harvest were large enough to impact fish growth and survival; increases in stream temperatures in salmon-bearing streams are concerning, particularly in the context of channel-observed temperature increases associated with forest harvests large enough to impact fish growth and survival; and modified forestry practices such as protecting riparian buffers around headwater streams could help offset some of the impacts of climate warming.

Simpcw identifies several management approaches to support the goals of protecting and conserving riparian habitat, to ensure that Simpcw rights, interests and values related to riparian areas are adequately protected.

- Minimum tree retention requirements within Forest Planning and Practices Regulation (FPPR) Riparian Management Zones (RMZs) have been standardized.
- Simpcw Enhanced Riparian Management Zones (ERMZs) have been established. Simpcw has identified priority streams to which a 100-meter wide ERMZ applies. A 100-meter wide ERMZ applies to wetlands greater than 0.9 hectares in area, and lakes 5 hectares or less in area. A 200-meter wide ERMZ applies to lakes greater than 5 hectares in area. Minimum tree retention requirements within these ERMZs are specified.
- Simpcw expands upon FRPA riparian area practice requirements by specifying additional standards of practice for operations in and around streams.

It is the responsibility of natural resource users to field-locate and map all riparian features that are intersected by the proponent's development. Where ERMZs apply (priority streams, wetlands, and lakes), it is the responsibility of natural resource users to accurately map the ERMZ boundaries, based upon the physical location of the edges of: Priority Stream channels, applicable wetlands, and all lakes. While Simpcw has made available spatial information to identify Priority Stream ERMZs, the mapped boundaries of these ERMZs are for identification purposes only.

5.1.6 Simpcw Standards of Practice – Tree Retention within Riparian Management Zones

Within Simpcwúl̓ecw, forest licensees and other natural resource users will:

1) Retain a minimum 50% of the trees within the portion of any Forest Planning and Practices Regulation (FPPR) Riparian Management Zone (RMZ) that is located within a cutblock. Refer to Table 1 below. This retention can be measured as basal area, number of trees, treed proportion of RMZ area, or a combination of these. Simpcw preference is for retention to be relatively evenly distributed throughout the RMZ.
2) Where forest stand circumstances or harvest constraints are such that it is not possible to achieve 50% tree retention within a cutblock RMZ and a reduced level of retention is proposed, a Qualified

[11] Dylan Stuart Cunningham, 14 February 2023. Canadian Journal of Fisheries and Aquatic Sciences https://doi.org/10.1139/cjfas-2022-0255, *https://summit.sfu.ca/item/35496*

Professional must document a rationale that supports the reduced retention level, and make this rationale available to Simpcw.

3) Within the first 10 metres of the cutblock RMZ, retain at a minimum, all non-merchantable trees, understory trees, and riparian vegetation, where it is practicable to do so.
4) Retain a minimum of 50% of the trees within a Simpcw Enhanced Riparian Management Zone (ERMZ) that is located within a cutblock. Refer to Table 2 below. This retention can be measured as basal area, number of trees, treed proportion of ERMZ area, or any combination of these. Simpcw preference is for retention to be relatively evenly distributed throughout the ERMZ.
5) Where forest stand circumstances or harvest constraints are such that it is not possible to achieve 50% retention within the ERMZ, and a reduced level of retention is proposed, a Qualified Professional must document a rationale that supports the proposed reduced retention and make this rationale available to Simpcw.
6) Employ the following minimum riparian practice requirements to minimize adverse impacts to stream channels, stream banks, and riparian vegetation, when conducting forest activities:
    a) Tracks or wheels of ground-based machinery will not be operated within 5 meters distance of a stream bank.
    b) Remove harvest related debris that has been introduced to a stream channel and that has the potential to adversely impact that stream by the completion of harvesting. Natural in-stream debris must be left in place.
    c) Avoid physical contact with stream banks and stream channels when falling and yarding around streams. Trees that are harvested from riparian areas will be felled, and yarded or skidded away from streams where it is practicable to do so.

Table 1 Minimum Riparian Management Zone Tree Retention

FPPR Riparian Class[1]	FPPR riparian feature dimension[1] (m)	FPPR Riparian Management Area[2] width (m)	FPPR Riparian Reserve Zone[2] width (m)	FPPR Riparian Management Zone[2] width (m)	FPPR Riparian Management Zone Minimum Tree Retention [3] (%)
S1-A stream	≥ 100	100	0	100	**50**
S1-B stream	> 20	70	50	20	**50**
S2 stream	5 – 20	50	30	20	**50**
S3 stream	1.5 - 4.9	40	20	20	**50**
S4 stream	< 1.5	30	0	30	**50**
S5 stream	> 3	30	0	30	**50**
S6 stream	≤ 3	20	0	20	**50**
W1 wetland	>5ha	50	10	40	**50**
W2 wetland	1 - 5ha	30	10	20	**50**
W3 wetland	1 - 5ha	30	0	30	**50**
W4 wetland	0.25 - 1.0 ha	30	0	30	**50**
W5 wetland	complexes	50	10	40	**50**
L1-A lake	>1000ha	0	0	0	N/A (no RMZ)
L1-B lake	>5 - 1000ha	10	10	0	N/A (no RMZ)
L2 lake	1 – 5ha	30	10	20	**50**
L3 lake	1 – 5ha	30	0	30	**50**
L4 lake	0.25 - 1.0 ha	30	0	30	**50**

[1] Refer to Forest Planning and Practices Regulation (FPPR) 47, 48, and 49.
[2] Refer to FPPR 1.
[3] Minimum proportion of FPPR RMZ that must be retained. This can be measured as basal area, # of stems, treed proportion of RMZ area, or any combination of these.

Table 2 Minimum Simpcw Enhanced Riparian Management Zone Tree Retention

Riparian feature	Simpcw ERMZ width (m)	Simpcw ERMZ Retention[1] (%)
Priority Streams (identified by Simpcw)	**100**	**50**
All wetlands > 0.9 ha in area	**100**	**50**
Lakes ≤ 5 ha in area (L2, L3, L4)	**100**	**50**
Lakes > 5 ha in area (L1-A, L1-B)	**200**	**50**

[1] Minimum proportion of Simpcw ERMZ that must be retained. This can be measured as basal area, # of trees, treed proportion of RMZ area, or any combination of these.

5.2 SIMPCW DIRECTIVE – CKWNÉMTEN (CULTURAL USES)

Simpcw Directives define Cultural Uses as "expressions of culture, places of cultural practice, locales of spiritual and ceremonial significance and places on the landscape where our people lived and were buried, and includes objects, sites and knowledge" and presents the following guidance:

- Certain areas designated will be automatic assessment for Cultural Heritage Resources (CHR) and/or Preliminary Field Review (PFR).
- Concentrated areas of cultural importance will be chosen by Simpcw prior to field seasons.
- Historical and contemporary cultural use areas and resources are of equal value to Simpcw.

5.2.1 Context – Ckwnémten (Cultural Uses)

Through *Forest Planning and Practices Regulation* (FPPR)[12] Section 10, the B.C. Government has established a Cultural Heritage Resource (CHR) objective: "…to conserve, or, if necessary, protect cultural heritage resources..."

Currently, forest licensees present cutblock harvest and road construction proposals to Simpcw through the Simpcw Approval Process.[13] As part of this process, Simpcw selects areas to conduct CHR evaluations, and where applicable, present management recommendations to forest licensees to ensure that Cultural Heritage Resources are conserved and protected.

<u>Raush River Valley Indigenous Protected and Conserved Area</u>

As the decision-makers and yecwemínmen (guardians) of the tmicw (land), Simpcw has declared the Raush River Valley an Indigenous Protected and Conserved Area (IPCA), further asserting our inherent rights, responsibilities and relationships to the tmicw (land), tmesmescén (wildlife), and séwllkwe (waters) within Simpcwúl̓ecw. The Raush River Valley is located on the south side of the Robson Valley, in the northwest portion of Simpcwúl̓ecw. The terminus of the Raush River, where it flows into the Fraser River, is located 15 kilometres southeast of the community of McBride.

An IPCA is an area declared by an Indigenous government where that government holds the primary role of protecting and conserving ecosystems, through Indigenous laws, governance, and knowledge systems. IPCAs represent a long-term commitment to conservation, an exercise in guardianship of the tmicw (land), tmesmescén (wildlife), and séwllkwe (waters), and an opportunity to reconnect to the land. Simpcw is developing specific Indigenous Management Approaches that will apply to the Raush Valley IPCA and are exploring additional crown-based legal mechanisms of protection. As applicable management approaches are finalized, they will be added to this plan.

[12] https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/14_2004

[13] The Simpcw Approval Process is a combination of opportunities for review and feedback which ensures meaningful consultation and accommodation of Simpcw interests by the BC Crown and Third Parties in relation to use of land and/or resources in, or activities impacting, Simpcw's area of responsibility, Simpcwúl̓ecw.

5.2.2 Simpcw Standards of Practice – Ckwnémten (Cultural Uses)

Within Simpcwúl̓ecw forest licensees and other natural resource users will:

1) Continue to refer cutblock harvest and road construction proposals or other development proposals to Simpcw.
2) Where Simpcw provides Cultural Heritage Resource (CHR) management recommendations that conserve and protect CHR, ensure that those recommendations are incorporated into a mitigation strategy that is carried out.

5.3 SIMPCW DIRECTIVE – MELÁMEN (MEDICINE), PLANTS, AND TSREPRÉP (TREES)

Simpcw has been managing and using nekéct (forests) and forest resources, including understory plants and non-timber forest products, since time immemorial. We assert our rights to use, manage, and control forest resources for our benefit, and for the purposes of conservation and enhancement.

Simpcw Directives specify that buffers, avoidance, or other adequate retention will be required for plants and medicines of interest.

5.3.1 Context – Melámen (Medicine), Plants, and Tsreprép (Trees)

Through Cultural Heritage Resource (CHR) evaluations, Simpcw will present management recommendations to forest licensees or other natural resource users to ensure that trees and plants of importance to Simpcw are adequately conserved and/or protected.

B.C. Chief Forester's Stocking Standards do not fully align with Simpcw values. Simpcw will consider supporting changes to these provincial stocking standards where these changes promote better alignment with Simpcw principles and values.

5.3.2 Simpcw Standards of Practice – Melámen (Medicine), Plants, and Tsreprép (Trees)

Within Simpcwúl̓ecw, forest licensees and other natural resource users will:

1) reserve the following tree species or stands of trees from harvest:
    a) Western yew;
    b) Trembling aspen; and
    c) Paper birch.
2) Despite this limitation, harvest of these tree species may occur to accommodate:
    a) road construction where no practicable alternative location for the road exists;
    b) harvest operations where the trees are located such that they unduly constrain harvest of other species; or

c) harvest operations that specifically target these species.

3) Where these tree species are harvested, they will be offered for use by Simpcw.
4) Limit the harvest of these trees only to the extent necessary to accommodate the road construction or harvest operations.
5) Conduct operations consistent with the plant and tree management recommendations provided by Simpcw though the Cultural Heritage Resource (CHR) process.;
6) Not employ the use of chemical herbicides to manage brush competition in forest cutblocks; and
7) Conduct operations consistent with *Simpcw Invasive Plant Management Policy*.

5.3.3 Context – Biodiversity and Old Growth Forests

Simpcw has a strong mandate to manage its nekéct (forests) at a landscape level in accordance with the mission and vision of the community. Retention of old forest on the landscape is an important component of this management, as it provides a means of conserving and protecting biodiversity, respecting Simpcw cultural and traditional values, and supporting the Simpcw Principles of Yecwmenúl̓ecw (Taking Care of the Land), Tknémentem (Preserving the Land), and Xyemstém re Tmicw (Respecting the Earth).

Simpcw First Nation asserts its right to determine how old forests will be managed within Simpcwúl̓ecw. Any decisions about Old Growth forests in Simpcw territory will be made by Simpcw, based on Simpcw Principles and the Simpcw Directives.

Old Forest Management – Indirect and Direct

Within Simpcwúl̓ecw, the federal and provincial governments manage and protect old forests from commercial harvest both indirectly and directly.

Indirect old forest protection exists where the primary objective of a government-established landscape feature is to manage a value or values other than old forest.
Features that indirectly contribute to old forest management include:

- National parks;
- Provincial parks;
- Protected areas;
- Ecological reserves;
- Recreation areas (some, dependent on the recreation management objectives); and
- Wildlife management areas (some, dependent on the wildlife management objectives).

Direct old forest management and protection most commonly occurs where the B.C Government establishes old growth forest objectives and targets through a legal order.

There are two categories of old growth forest legal order. The first category is an order that establishes old growth forest objectives and spatially identifies Old Growth Management Areas (OGMAs) to achieve those legal objectives. OGMAs are defined areas or stands of forest on the landscape that contain, or are managed to attain, the structural old growth forest attributes defined in the order. OGMAs are generally

protected from commercial harvest, which forest licensees acknowledge in their Forest Stewardship Plans.

The second category of old forest legal order, referred to as a non-spatial old growth order, establishes old growth forest objectives without legally identifying OGMAs. Non-spatial old growth orders define structural old growth forest attributes and establish targets for old growth forest retention within a specified landscape. Outside of the legal process, government and forest licensees work together to spatially identify non-legal OGMAs that achieve the non-spatial old growth order objectives. Forest licensees commonly choose to formally incorporate these non-legal OGMAs into their Forest Stewardship Plans (FSPs) as no-harvest areas, as a strategy to achieve the non-spatial old growth order objectives. Where non-legal OGMAs are incorporated into an FSP, the forest licensee holding the FSP is providing legal protection to the non-legal OGMAs for the term of that FSP.

While tree age, forest type and ecological unit are the primary basis for establishing OGMA's (both legal and non-legal) additional values such as wildlife habitat and cultural areas can also be the basis for OGMA establishment.

Old Forest Management – Old Growth Strategic Review and Priority Old Growth Deferrals

On July 17, 2019, the B.C. Government announced that an independent panel would be appointed to undertake a province-wide *Old Growth Strategic Review* (OGSR). [14] The purpose of the review was to inform the development of new old growth forest management policies and strategies. The OGSR was released in April, 2020 and included 14 recommendations, which the B.C. Government committed to implementing. Two key recommendations were:

- Indigenous Involvement - Engage the full involvement of Indigenous leaders and organizations to review this report and any subsequent policy or strategy development and implementation.
- Immediate Response to Ecosystems at Very High Risk - Until a new strategy is implemented, defer development in old forests where ecosystems are at very high and near-term risk of irreversible biodiversity loss.

In response to the OGSR recommendations, the B.C. Government formed the Old Growth Technical Advisory Panel (OGTAP) to develop old forest deferral recommendations. The OGTAP subsequently published their deferral recommendations in *Priority Deferrals: An Ecological Approach*[15] and the companion document, *OG TAP Old Growth Deferral: Background and Technical Appendices*.[16]

In November 2021, the B.C. Government implemented the OGTAP recommendations for priority old growth deferral without fully involving Simpcw First Nation in their decision, contrary to the *Declaration*

[14] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/strategic-review-20200430.pdf

[15] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/summary_for_g2g_package.pdf

[16] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/og_tap_background_and_technical_appendices.pdf

on the Rights of Indigenous Peoples Act (DRIPA)[17] and the OGSR recommendation to involve Indigenous groups in the process. While Simpcw supports B.C.'s actions to protect old forests, when it comes to decisions involving values within Simpcwúl̓ecw, those decisions will be made by Simpcw.

Within *Priority Deferrals: An Ecological Approach*,[18] the OGTAP defined At-Risk Old Growth categories and spatially identified three deferral categories of old growth forest plus a deferral category of Older Mature forest, all of which apply to Simpcwúl̓ecw:

- Big-Treed Old Growth are forest stands that meet the Old Growth age definitions established by OGTAP. These stands must be a minimum age of 140 or 250 year, depending on Biogeoclimatic Ecosystems Classification (BEC) zone. Deferral areas have been mapped to achieve the old growth targets established by the OGTAP for each BEC zone. These targets range from 5% to 19.8% within Simpcwúl̓ecw.
- Ancient Forests are a subset of Big-treed Old Growth that are at least 250 or 400 years of age, depending on BEC zone.
- Remnant Old Ecosystems are Big-treed Old Growth stands within forests ecosystems with less than 10% old forest remaining (either less than 10% total by BEC unit, or less than 10% within each landscape unit to capture geographic variability). These stands may also be classified as Ancient.
- Older Mature forests are forest stands that have not reached the minimum OGTAP old growth age but have been identified for deferral because they function as recruitment forest where insufficient Big-treed Old Growth remains to achieve targets. These forest stands are mapped as Big-treed Old Growth with an older mature identifier.

Within Simpcwúl̓ecw, the status of existing Big-treed Old Growth relative to OGTAP targets can be categorized three ways:

- The amount of Old Growth within a given BEC meets or exceeds the OGTAP target.
- The amount of Old Growth within a given BEC falls short of the OGTAP target and the OGTAP is able to identify an amount of Older Mature forest that will function as Old Growth recruitment and is equivalent to the Old Growth shortfall.
- The amount of Old Growth within a given BEC falls short of the OGTAP target and a shortfall to the target remains after all the Older Mature has been identified as Old Growth recruitment.

5.3.4 Simpcw Standards of Practice – Biodiversity and Old Growth Forests

Within Simpcwúl̓ecw:

[17] Declaration on the Rights of Indigenous Peoples Act (gov.bc.ca)
[18] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/summary_for_g2g_package.pdf

1) Forest licensees will conserve and protect legal and non-legal Old Growth Management Areas (OGMAs) through the results and strategies specified in their Forest Stewardship Plans (FSPs).
2) Forest licensees will not harvest Old Growth Technical Advisory Panel (OGTAP) Big-treed Old Growth priority deferral stands that are classified as Ancient or Remnant, unless that harvest is conducted to:
    a) Control a forest health outbreak;
    b) Salvage timber damaged by a catastrophic natural event such as wildfire or forest pest epidemic; or
    c) Construct a road, where no practicable alternative location for the road exists.
3) Forest licensees may harvest OGTAP Big-treed Old Growth priority deferral stands that are not classified as Ancient, Remnant or Older Mature, where they are located within a BEC zone that has an Old Growth target surplus, if Simpcw agrees that an Old Growth replacement area proposal provided by the licensee is appropriate.
4) Forest licensees will not harvest OGTAP Priority Big-treed Old Growth stands that are not classified as Ancient, Remnant or Older Mature, where they are located within a BEC zone that has an Old Growth target deficit, unless that harvest is conducted to:
    a) Control a forest health outbreak;
    b) Salvage timber damaged by a catastrophic natural event such as wildfire or forest pest epidemic; or
    c) Construct road access, where no practicable alternative location for the road exists;
5) Forest licensees will not harvest OGTAP Big-treed Old Growth priority deferral stands classified as Older Mature, where they are located within a BEC zone that has an Old Growth Target deficit and there is insufficient Older Mature available to make up the deficit, unless that harvest is conducted to:
    a) Control a forest health outbreak;
    b) Salvage timber damaged by a catastrophic natural event such as wildfire or forest pest epidemic; or
    c) Construct road access, where no practicable alternative location for the road exists.
6) Forest licensees may harvest OGTAP Big-treed Old Growth priority deferral stands that are classified as Older Mature, where they are located within a BEC zone that has Old Growth target deficit, and where there is a surplus of Older Mature available to make up the deficit, if Simpcw agrees that an Older Mature replacement area proposal provided by the licensee is appropriate.
7) Where harvest is proposed within any forest stands identified for deferral by the OGTAP, a Qualified Professional must provide to Simpcw a harvest rationale which includes a proposal to replace the harvested deferral area with a biologically and ecologically comparable forest stand that has attributes consistent with Simpcw Directives and this Interim Stewardship Plan.
8) Where harvest of an OGTAP deferral stand is conducted to manage a forest health outbreak, salvage damaged timber, or construct road access, that harvest is limited to the extent necessary to conduct that activity.
9) Where a cutblock is developed in a forest stand that is not identified for deferral by OGTAP and the results of the appraisal timber cruise or field observations indicate that the forest type or types meet the OGTAP definitions for Old Growth, forest licensees will use the process described in the

Ministry of Forests *Field Verification of Priority Old Forest Deferral Areas: Technical Guidance*[19] to determine if the forest types meet the priority old forest deferral criteria and how the information is shared.

5.4 SIMPCW DIRECTIVE – TMESMESCÉṈ (WILDLIFE)

Simpcw Directive*s* state that careful consideration will be paid towards: preserving specific wildlife habitat; preventing wildlife predation; and allowing species more natural security.

Simpcw Directives outline that road deactivation and full rehabilitation will be required once harvesting activities have finished within Simpcwúl̓ecw to reduce road density related impacts to wildlife.

Simpcw identifies the following wildlife species of particular concern:

- Mountain Caribou – preservation of specific habitats, with minimal or total avoidance.
- Ungulates-Moose habitat and deer winter range (priority due to forest fires).

Within Simpcwúl̓ecw, the B.C. Government has:

- Identified habitat that is necessary for the survival of Mountain Caribou, and specified General Wildlife Measures (GWMs) that are necessary to protect and conserve that habitat through a Government Actions Regulation (GAR) Order.
- Identified Critical Moose Winter Range and Critical Deer Winter Range
- Specified management objectives that apply to Critical Moose Winter Range and Critical Deer Winter Range through the Kamloops Higher Level Plan Order (KHLPO). Forest Licensees commit to results or strategies in their Forest Stewardship Plans to achieve these ungulate objectives.

Simpcw may prescribe additional management requirements for mountain caribou, moose, and deer, beyond what is currently required by the B.C. Government, to ensure that these wildlife species, so important to Simpcw culture, are adequately conserved and protected.

5.4.1 Context – Tmesmescéṉ (Wildlife), Roads

It is generally understood that as road density increases within a landscape, the risk to wildlife who depend upon that landscape for habitat also increases. This is a result of decreased habitat suitability, increased human/wildlife interactions resulting in disturbance or mortality, and improved predator mobility. Ungulates such as moose, deer and caribou, as well as predators such as grizzly bear, are particularly susceptible to increased road densities. B.C. Government *Extension Note 120* reports that areas with low road densities (< 0.6 km/km2) had triple the grizzly bear density of areas with high road density.[20]

[19] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/deferral-maps/field-verification-deferral-guide.pdf
[20] https://www.for.gov.bc.ca/hfd/pubs/Docs/En/En120.pdf

Extension Note 120 then goes on to advise that access closures are an effective means to improve connectivity between grizzly bear habitats and sub-populations, increase bear density, and expand the distribution of bear populations.

Road densities are also understood to affect watershed processes. *Watershed Status Evaluation Protocol (WSEP): Tier 1 Watershed-level fish values monitoring*[21] indicates that road densities in a watershed sub-basin that are in excess of 2.1 km/km^2 indicate a high risk of detectable changes to stream peak flows, and a high risk of surface erosion. The protocol also states:

> Road development can interfere with natural patterns of overland flow through a watershed, interrupt subsurface flow, and increase peak flows (Smith and Redding 2012). Roads are also one of the most significant causes of increased erosion, as road construction exposes large areas of soil to potential erosion by rainwater and snowmelt while the roads themselves intercept and concentrate surface runoff so that it has more energy to erode even stable soils (WAP 1995a). Increases in road density may lead to magnified surface erosion and landslide risk, with associated increases in stream turbidity and potential disruptions to aquatic functions. High road densities within a watershed indicate a greater risk to fish habitat disturbance.[22]

Road densities within watershed units in Simpcwúl̓ecw vary significantly. Watershed cumulative effects studies completed in 2018 through the *B.C. Cumulative Effects Framework*[23] indicate that in 2018, road densities within the Kamloops Timber Supply Area (TSA) portion of Simpcwúl̓ecw ranged from 0 km/km^2 to 5.2 km/km^2. Of the 632 watershed reporting units reported, 58% had road densities exceeding 2.1 km/km^2.

Forest licensees and other natural resource users have the direct ability to reduce road densities by conducting road rehabilitation. In the B.C. timber appraisal system, access maintenance and deactivation costs (including rehabilitation) are included in the Road Maintenance Costs timber appraisal allowance.

Timber appraisal allowances are based upon actual annual licensee operating costs that the B.C. government first gathers through survey, then analyzes, compiles, and averages. Road rehabilitation is not currently conducted on a widespread basis, so the current timber appraisal allowance for conducting road rehabilitation is likely much less than what the actual cost would be to conduct the work. Over time, as roads are rehabilitated more commonly and the cost of conducting that work is reported more frequently, the Road Maintenance Cost timber appraisal allowance will more accurately reflect the cost of conducting the work.

[21] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/integrated-monitoring/wsep_tier_1_watershed_values_monitoring_protocol_v34_march01_2019.pdf
[22] https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/integrated-monitoring/wsep_tier_1_watershed_values_monitoring_protocol_v34_march01_2019.pdf
[23] https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework/regional-assessments/thompson-okanagan

5.4.2 Simpcw Standards of Practice – Tmesmescéȵ (Wildlife), Roads

Within Simpcwúl̓ecw, forest licensees and other natural resource users will:

1) Carry out the following rehabilitation activities on the area occupied by permanent access structures, temporary access structures and excavated or bladed trails that do not provide access to future timber harvest opportunities, when the operational use of those structures is no longer required by the licensee:
    a) De-compact compacted soils;
    b) return displaced surface soils, retrievable side-cast, and berm materials so that the natural contour of the area is re-established;
    c) ensure natural drainage patterns are re-established;
    d) place woody debris on the exposed soil surface; and
    e) revegetate the exposed soil.
2) Work with Simpcw, the B.C. Government, and stakeholders to:
    a) Implement access restriction protections in sensitive habitat; and
    b) Source long-term funding alternatives for First Nations and industry-led road deactivation and rehabilitation activities.

5.4.3 Context – Tmesmescéȵ (Wildlife), Species at Risk

Numerous species at risk and non-threatened wildlife are reliant on habitat within Simpcwúl̓ecw. The B.C. Government has established Wildlife Habitat Areas and Ungulate Winter Range for some identified species at risk. Within Forest Stewardship Plans (FSPs), forest licensees specify results and strategies to manage certain species of wildlife, where licensees have received a notice to do so. However, this approach does not adequately consider habitat requirements of all wildlife and species at risk.

A useful source of suggested measures for managing some species at risk is provided by the B.C. Government in *Accounts and Measures for Managing Identified Wildlife - Version 2004.*[24]

The B.C. Government has formally identified Wildlife Habitat Features (WHFs) in the Kootenay Boundary Region through section 11(1) of the Government Actions Regulation (GAR) Order. A copy of the Order, Field Guides, and other background information is published online.[25]

Simpcw expands the concept of WHFs to Simpcwúl̓ecw by designating WHFs within this Interim Stewardship Plan, as the B.C. Government has neglected to establish similar wildlife protections within our territory.

[24] https://www.env.gov.bc.ca/wld/frpa/iwms/accounts.html

[25] https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/legislation-regulation/forest-range-practices-act/government-actions-regulation/wildlife-habitat-features/kootenay-boundary-wildlife-habitat-features-order

5.4.4 Simpcw Standards of Practice – Tmesmescéṅ (Wildlife), Species at Risk

Within Simpcwúl̓ecw forest licensees and other natural resource users will:

1) Plan resource development to conserve or protect known occurrences of red- and blue- listed species that are mapped by the B.C. Conservation Data Centre (CDC).[26]
2) Not damage or render ineffective the following Simpcw designated Wildlife Habitat Features, wherever they are encountered:
   a) Spel̓qwéqs (Bald Eagle) nests;
   b) Tsícwtśecw (Osprey) nests;
   c) Flammulated Sníne (Owl) nests;
   d) Scúcwep (Western Screech Owl) nests;
   e) Northern Goshawk nests;
   f) Lewis's Tseqwqíṅ (Woodpecker) nests;
   g) Ungulate or Skeḿcís (Grizzly Bear) wallows;
   h) A bat hibernaculum; and
   i) Any stsiqllcw (animal den or burrow).
3) Report the location of a newly encountered Wildlife Habitat Feature to the Simpcw Natural Resources Department.

5.4.5 Context – Tmesmescéṅ (Wildlife), Connectivity Corridors

The report *Corridors Connecting Habitats in the Okanagan Valley*[27] summarizes a project done at the University of British Columbia (UBC), Okanagan Campus with the objective of identifying "a terrestrial network of patches and corridors whose conservation or restoration may contribute to maintaining habitat connectivity for a broad range of species in the Okanagan Valley." These corridors were identified to address habitat loss, and fragmentation of existing habitats caused by anthropogenic activities, which impact species that require large, contiguous tracts of habitat in order to survive. As well, some species need to safely transit through valley bottoms and along riparian areas to access their required habitat. For some species, these human-caused land disturbances serve as barriers to movement, effectively isolating populations in small pockets of remnant habitat.

Fragmentation of wildlife habitat has occurred and continues to occur within Simpcwúl̓ecw. Simpcw designates Wildlife Connectivity Corridors within this plan that will be managed to mitigate impacts to wildlife that are the result of habitat fragmentation.

5.4.6 Simpcw Standards of Practice – Tmesmescéṅ (Wildlife), Connectivity Corridors

[26] https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/conservation-data-centre
[27] https://complexity.ok.ubc.ca/2014/12/01/corridors-connecting-habitats-in-the-okanagan-valley/

Within Simpcwúl̓ecw, where Simpcw designates a Wildlife Connectivity Corridor on the landscape, forest licensees other natural resource users will:

1) Limit harvesting within that connectivity corridor to cutblocks that:
    a) Employ a partial cut silviculture system;
    b) Retain a minimum 50% of the pre-harvest basal area within the cutblock; and
    c) Are designed to uniformly retain trees throughout the cutblock.
2) Where forest stand circumstances or harvest constraints are such that it is not possible to achieve 50% tree retention within a cutblock, and a reduced level of retention is proposed, a Qualified Professional must document a rationale that supports the reduced retention and make the rationale available to Simpcw.

5.5 SIMPCW DIRECTIVE – ARCHAEOLOGICAL SITES

Simpcw Directives identify the physical artifacts of our ancestors as the priority archaeological issue within Simpcwúl̓ecw.

Simpcw adheres to the Heritage Conservation Act (HCA) in recognizing sites that are protected if they pre-date 1846.

Simpcw does not limit archaeological site protection to sites identified as existing prior to 1846. Sites dated after 1846 are equally significant to Simpcw. Simpcw aims to work with proponents to create appropriate protection and mitigation plans for sites both pre- and post- 1846.

5.5.1 Context – Archaeological Sites

Through the cutblock and road approval process[28] (where forest licensees present harvest proposals to Simpcw), Simpcw conducts archaeological assessments on priority areas selected by Simpcw.

5.5.2 Simpcw Standards of Practice – Archaeological Sites

Within Simpcwúl̓ecw, forest licensees and other natural resource users will:

1) Work with Simpcw to create appropriate protection and mitigation plans for both pre- and post-1846 archaeological resources; and
2) Conduct forest operations consistent with those protection and mitigation plans, where applicable.

[28] The Simpcw Approval Process is a combination of opportunities for review and feedback which ensures meaningful consultation and accommodation of Simpcw interests by the BC Crown and Third Parties in relation to use of land and/or resources in, or activities impacting, Simpcw's area of responsibility, Simpcwúl̓ecw.

6 MAPS AND SUPPORTING DATA

The following supporting data is integral to the Simpcw Interim Stewardship Plan. Natural Resource users are responsible for reviewing this data to ensure that the Standards of Practice specified in the plan are achieved.

- Overview map of Priority Stream Enhanced Riparian Management Zones (ERMZs) for priority streams and Wildlife Connectivity Corridors
- Spatial data package for Enhanced Riparian Management Zones
- Spatial data package for Wildlife Connectivity Corridors
- Fisheries Sensitive Watershed Assessment Protocols
    - Active Fluvial Unit – Assessment Steps and Best Management Practice
    - Active Fluvial Unit Assessment Steps – Cutblock
    - Active Fluvial Unit Assessment Steps – Road
    - Fisheries Sensitive Watershed Active Fluvial Unit Guidance
    - Sediment Generation and Delivery – Assessment Steps and Best Management Practices
    - Sediment Generation and Delivery Assessment Flow Chart
    - Fisheries Sensitive Watershed Sediment Mitigation Assessment Guidance
    - Sediment Mitigation Assessment

This plan, as well as the supporting data, can be found on Simpcw.com and SimpcwResourcesGroup.com

7 AMENDMENT LOG

Amendment #	Details	Effective Date
Amendment 1	Changes to section 5.1.5 Context - Tree Retention within Riparian Management Zones, and Table 2 Minimum Simpcw Enhanced Riparian Management Zone Tree Retention. Two classes of lake ERMZ are now specified, revised from one. A 100 meter ERMZ will now apply to lakes that are 5 hectares or less in area. A 200 meter ERMZ will continue to apply to lakes that are greater than 5 hectares in area.	May 22, 2024