



Ref: 18046-00/2016, 18045-00/2016

November 30, 2016

By email

Re: Peace Natural Resource District, District Manager Letter of Expectation Regarding Forest Stewardship Plan replacement

Dear Peace Natural Resource District Forest Licensees and Forest Professionals:

The Ministry of Forests, Lands and Natural Resource Operations (FLNRO) is British Columbia's land manager responsible for the stewardship of Provincial Crown land, cultural, and natural resources, with a vision of economic prosperity and environmental sustainability.

This District Manager (DM) Letter of Expectation regarding Forest Stewardship Plans (FSP) is intended to align with the FLNRO vision, build upon the March 2016 Chief Forester's Guidance as well as provide local Peace Natural Resource District (DPC) content. As the delegated decision maker (DDM), I set these expectations in consideration of the unique operational circumstances in the DPC and in consideration of the changing landscape and forest resource profile as a result of the impacts of forest health, fire, increased climate variability, cumulative effects, and increased frequency and severity of drought.

As forest professionals, I expect that you manage the landscape and values of DPC consistent with the *Foresters Act* and the Association of BC Forest Professionals (ABC FP) code of ethics, practice standards, guidelines, and bylaws.

The following expectations are intended to provide transparency regarding what I believe is necessary to consider when preparing replacement FSPs. This letter is not intended to include *all* expectations of forest professionals. As forest professionals, you are required to address all legal requirements in the *Forest and Range Practices Act* (FRPA) and its regulations, as well as consider pertinent Government objectives, policy guidance, best available information, and professional guidance.

The following expectations are not legally binding; however they do constitute policy guidance under the FRPA non legal realm.

Expectations regarding the development and administration of FSPs

Expectations Regarding Replacement FSPs vs Extensions to existing FSPs

As per the 2016 Chief Foresters guidance letter, it is my expectation that new FSPs will incorporate the expectations outlined within this letter. I recognize that limited extensions to existing FSPs may be required on a case by case basis to allow for the development of new FSPs that meet the expectations outlined in this letter. Should a limited extension to a current FSP be required it is expected that a rationale will be provided outlining why a limited extension of the current FSP is required.

Clarification Regarding Results, Strategies and Measures Being Measurable & Verifiable

As per the 2016 Chief Foresters guidance letter and as noted within the Forest Practices Board report *“Forest Stewardship Plans: are they meeting expectations, ([new provincial expectations for FSPs](#))*, replacement FSPs must include Results and/**or** Strategies for Objectives Set by Government. Each commitment in an FSP must clearly specify whether it is a result **or** strategy. FSPs may include multiple results and/or strategies for each objective, as long as they collectively meet the approval tests of being consistent with the objective to the extent practicable, and measurable or verifiable. All Measures, including those for Natural Range Barriers and Invasive Plants, will be evaluated against two approval tests: whether they will effectively achieve their intended result; and, whether they are enforceable (i.e., measurable or verifiable). For more information on expectations for measurable and verifiable, please refer to the Compliance and Enforcement Program staff Bulletin #12 *“Guidance to Compliance & Enforcement Program Staff on The Assessment of Measurable or Verifiable Results or Strategies within a Forest Stewardship plan (FSP)”* ([Assessment of Measurable or Verifiable Results or Strategies within a FSP](#))

Collaborative Planning

To more appropriately manage for the cumulative effect of forestry operations on the land base, and to provide a more consistent approach, I expect that efforts be made to more closely align FSP content including results and strategies between FSPs within the same watershed. Also, I encourage the development of multi signatory FSPs that may include more than one administrative management unit (Timber Supply Area or Tree Farm License). An FSP with multiple signatories assists in achieving more coordinated development on the land base, and reduced administrative burden by Forestry licensees, the Province and First Nations. Where an FSP with multiple signatories is not feasible, I expect collaboration and cooperation between Forest licensees in development of consistent and complimentary Results, Strategies and Measures between FSPs. Where several overlapping FSPs are proposed for replacement, please note that a longer review period may be necessary to allow all affected parties to have time to review the plans, this includes First Nation reviews.

Also, this process allows the opportunity to take a strategic look at the Forest Development Units (FDU) identified within each plan. Current FSPs for DPC identify FDUs established as the entire Timber Supply Area; this may or may not be appropriate going forward. Consideration should be given to reducing the overlap of licensee FDUs and reducing the size of FDUs if there are areas where no development is going to occur. By reducing overlap and size of FDUs efficiencies may be

gained through reduced First Nations Consultation, public and stakeholder engagement requirements, as well as improving the ability to measure and verify Results and Strategies.

Innovation in development of Results and Strategies to allow for flexibility and reduced administrative burden

FSPs within the DPC have previously identified Results and/or Strategies, largely with singular goals in mind for each Objective Set by Government. It is my expectation that this opportunity be taken to incorporate flexibility within Results and Strategies that allows for the adaptability required to manage the landscape to different targets under certain identified situations. The Sustainable Forest Management Plan for the Fort St. John Pilot Project area contains several examples of innovative indicators and targets to achieve the identified Landscape Level Objectives identified in the *Fort St. John Pilot Project Regulation*, and I encourage the incorporation of these approaches into replacement FSPs where appropriate. However, I continue to expect that where an exemption from specifying a Result and/or Strategy for an objective is warranted, FPPR Section 12 is the appropriate instrument, and that Results or Strategies will not be used to create self-exemptions or circumvent the exemptions process established in legislation.

Expectations Regarding New Information and Best Management Practices to address FRPA Values

As mentioned in the Chief Forester guidance document, in the decade since most FSPs were first approved, the landscape has changed and we have gained experience, knowledge and feedback.

I believe it is necessary that Forest Professionals manage beyond the legal objectives to realize sustainable and social management of the FRPA values. This is consistent with government's requirement to consider the condition and management of values associated with First Nations rights, cumulative effects on values, and the legal requirements in the BC Water Sustainability Act (2016). As a result, I expect that the following information be considered as new information or best management practices for managing FRPA values within the DPC.

Results of Natural Resource Monitoring

I expect that Forest Professionals continue to improve their management of the FRPA values. I expect that Forest Professionals consider the trends and identified areas of improvement from the Forest and Range Evaluation Program (FREP [Forest and Range Evaluation Program](#)) and Multiple Resource Value Assessments (MRVA [Multi resource value assessments](#)).

Expectations pertaining to Objectives Set by Government identified in the Forest Planning and Practices Regulation

OBJECTIVES SET BY GOVERNMENT FOR BIODIVERSITY AND AT THE STAND AND LANDSCAPE LEVEL

I expect that Forest Professionals emulate the pattern of natural disturbances at a stand and landscape-level to maintain forest biodiversity and the diversity and abundance of native species and their habitats. I expect that professionals consider best available science on natural disturbance regimes, and build upon the existing coarse-fine filter legal designations and regulations that exist under FRPA, *Land Act* or higher level plans (HLP) where necessary.

OBJECTIVES SET BY GOVERNMENT FOR VISUALS

I expect that Forest Professionals will not prepare Results and Strategies that exempt themselves from having to meet a Visual Quality Objective (VQO). Results and/or Strategies should not be used to create exemptions or circumvent the exemption process established in legislation. Where an exemption is warranted, *Forest Planning and Practices Regulation* (FPPR) Section 12 (7) is the appropriate instrument. VQOs are defined in FPPR 1.1, and I expect that forest professionals will utilize and ensure consistency with these VQO definitions. Results and/or Strategies that contradict the categories of alteration definitions will not be approved.

OBJECTIVES SET BY GOVERNMENT FOR WILDLIFE

Caribou

Caribou has been identified as a highly important species to the Province and Treaty 8 First Nations in Northeast BC. The Province, in cooperation with First Nations, is continuing its efforts to improve the ongoing management of the Mountain and Boreal Caribou. First Nations have expressed concern about the interaction between forest management activities and potential effects to caribou habitat and populations, including logging areas next to the alpine which removes the buffer zone between moose habitat and caribou habitat. I expect ongoing work to consider the following Implementation Plans as Best Practices:

- “Implementation Plan for the Ongoing Management of South Peace Northern Caribou (*Rangifer tarandus* caribou pop. 15) in British Columbia (March 2013)” ([Implementation Plan for the Ongoing Management of South Peace Northern Caribou \(*Rangifer tarandus* caribou pop. 15\) in British Columbia](#)).
- “Implementation Plan for the Ongoing Management of Boreal Caribou (*Rangifer tarandus* caribou pop. 14) in British Columbia (2011)” ([Implementation Plan for the Ongoing Management of Boreal Caribou \(*Rangifer tarandus* caribou pop. 14\) in British Columbia](#)).
- “Action Plan for the Klinse-Za Herd of Woodland Caribou (*Rangifer tarandus* caribou) in Canada” (draft) ([An action plan for recovery of the Moberly herd of woodland caribou ...](#)) (The Province would like to acknowledge the work completed by West Moberly and Saulteau First Nations on the development and implementation of this plan)

It is my expectation that new FSPs include recognition of the value of caribou habitat and be appropriately reflected in Results and/or Strategies. To address this value I require new FSPs to consider the findings of these plans in the results and/or strategies.

Over time it is expected that further management direction will be coming and it is expected that the FSPs will require amendment to incorporate any revised implementation plans

OBJECTIVES SET BY GOVERNMENT FOR CULTURAL HERITAGE RESOURCES

Since the transition to FRPA, a greater understanding of Cultural Heritage Resources (CHR) has been gained by Forest Licensees and the Province. This greater understanding of these values

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			Website:	www.gov.bc.ca/for

allows for improved management of these resources. Therefore, I expect that replacement FSPs contain specific management consideration of the following identified CHRs that are of known importance within the DPC.

- Other wildlife features, including habitat features for species of cultural importance to First Nations
- Berry harvesting areas
- Harvesting areas for other food and medicinal plants
- Alternative methodology for coarse woody debris management to improve habitat for species of cultural importance to First Nations
- First Nation trails
- First Nations camp locations for exercise of Treaty rights
- Areas of identified spiritual or cultural significance to First Nations
- Fossils and Paleolithic artifacts not managed under the Heritage Conservation Act

Moose Habitat Management

Moose have been identified as highly important to Treaty 8 First Nations in Northeastern BC. Moose are a cornerstone of their culture and are significant in the exercise of the Treaty Right to hunt. First Nations have expressed concern about the interaction between forest management activities and the potential effects to moose habitat and populations. Ministry of Forests, Lands and Natural Resource Operations, Resource Management Division staff have committed to identifying appropriate areas within DPC where management of moose habitat and browse should be managed as a priority. This information will be provided to current holders of FSPs for incorporation into new FSPs.

It is my expectation that new FSPs include recognition of the value of moose habitat as a Cultural Heritage Resource which is appropriately reflected in Results and/or Strategies. To address this value I expect new FSPs to contain:

- a) Stocking standards that allow for a higher willow, alder and aspen content and competition at the Free Growing stage which is anticipated to reduce the need for “administrative” brushing treatments to achieve Free Growing.
- b) Commitments to incorporate additional screening along roadsides where feasible, during harvest development within these identified areas;
- c) Commitments for minimizing loop roads and road systems, and consider remediation of existing roads, to assist in reducing predation on moose;
- d) Commitments to plan and design cutblocks with irregular boundaries, wildlife patches, understory protection, and other features and techniques that increase cover for moose;
- e) Consideration to avoid or buffer around moose licks and game trails;
- f) The establishment of wildlife tree patches or strategic screening between contiguous blocks to provide travel corridors, while considering reasonable dash distances.

Expectations pertaining to Measures identified in the Forest Planning and Practices Regulation

Expectations pertaining to measures to mitigate the effect of removing or rendering ineffective natural range barriers

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I expect Forest Professionals to increase their awareness and accountability around the protection of natural range barriers. Of particular concern in the DPC is that natural barriers/debris adjacent to small streams, wetlands and non-classified drainages is left undisturbed. DPC has initiated a project, in conjunction with Range Tenure holders to map and inventory known Range Barriers. This information will be provided to Forest Professionals as it is collected. It is my expectation that this information, in addition to information provided by range tenure holders during operational planning and Timber Range Action Planning (TRAP) is incorporated into block and road planning consistent with identified Measures in the FSPs.

Expectations pertaining to measures to prevent the introduction or spread of invasive plants

I expect Forest Professionals to increase their awareness and accountability to prevent the spread of invasive plants. I have attached *FRPA IP Measures: Considerations for Plan Preparers and Approvers* (2016) and is provided as guidance to preparers and approvers of FSPs, Range Use Plans, and Range Stewardship Plans, on measures for invasive plants. A suite of preventative and responsive practices is expected to be adopted and demonstrated, including but not necessarily limited to staff and operator training, monitoring of establishment and encroachment and removal treatments. Over time it is expected that further management direction will be coming and it is expected that the FSPs will require amendment to incorporate any revised guidelines.

Expectations pertaining to Stocking Standards

I expect Forest Professionals to consider the recently released *2016 Fire Management Stocking Standards Guidance Document* ([Fire management stocking standards](#)) and the updates to the *Reference Guide for FDP Stocking Standards (2016)* ([Reference Guide for FDP Stocking Standards](#)) *Climate Change Related Stocking Standards* ([Updates to the Reference Guide for FDP Stocking Standards\(2014\): Climate-Change Related Stocking Standards](#)). I expect that professionals remain up to date with stocking standard changes and guidance as it becomes available.

As noted previously in this Letter of Expectation, I expect FSPs to propose innovative stocking standards to assist in addressing known challenges within DPC for values such as aspen management on range tenures, and to assist in supporting moose habitat management objectives. Over time it is expected that further management direction will be coming and it is expected that the FSPs will require amendment to incorporate any revised guidelines.

Expectations pertaining to communication of operational plans

First Nations at the operational planning level

In its 2016 report on Forest Stewardship Plans, the Forest Practices Board identified dissatisfaction from First Nations on the limited availability to review and comment on operational proposals. In addition, several First Nations have regionally expressed similar concerns.

I commend the Forest Licensees and BCTS within the DPC for regularly sharing their harvesting and road building proposals through the use of various operational plans. However, it is clear that there is a need to improve, and there are improvements that can be made to this process. Therefore, I encourage the following:

- the use of consistent naming conventions for these plans; consistent with the agreement reached at the May 2016 Peace District Licensee Steering Committee meeting where it was agreed that these plans will now be referred to as Forest Operating Plans.
- the coordination between Forest Licensees and BCTS in developing these Forest Operating Plans that will identify proposed blocks and roads from multiple proponents instead of just individual licensees. A coordinated multi licensee plan will better illustrate the cumulative impact of all the proposed activities and allow for coordinated analysis for FSP Results or Strategies where required.
- collaborative review between Forest Licensees, BCTS and First Nations of the Forest Operating Plans to enable discussions and come to agreement on mitigation, accommodation of First Nations concerns, or the identification of areas or activities that raise no First Nations concerns.

I want to emphasize that it is important to recognize that First Nations have significant interests to lands and resources in the region. The Province has identified reconciliation with First Nations as an important objective in Northeast BC.

I encourage Licensees to continue to build positive working relationships with First Nations, including through regular meetings, respectful and solution-oriented dialogue, and meaningful avoidance and mitigation measures.

If meaningful engagement and information sharing occurs between First Nations and Forest Licensees during operational planning processes, appropriate solutions can be found and implemented before the permit application stage. Cutting and road permits applications may then be considered for more streamlined consultation.

Stakeholder Communication at the operational planning level

In its 2015 report on Forest Stewardship Plans, the Forest Practices Board identified dissatisfaction from the public, various tenure holders and stakeholder groups on the limited availability to review and comment on operational proposals. I commend the Forest Licensees and BCTS within the DPC for regularly sharing their harvesting and road building proposals through the use of various operational plans. However, there are improvements that can be made to this process. Therefore, I encourage the use of consistent naming conventions for these plans, consistent with the agreement reached at the May 2016 Peace District Licensee Steering Committee meeting where it was agreed that these plans will now be referred to as Forest Operating Plans. Also, I encourage the coordination between Forest Licensees and BCTS in developing these Forest Operating Plans that will identify proposed blocks and roads from multiple proponents instead of just individual licensees. A coordinated multi licensee plan will better illustrate the cumulative impact of all the proposed activities and allow for coordinated preparation of FSP Results or Strategies where required.

I also expect that stakeholder engagement on replacement FSPs and subsequent operational plans will include but not be limited to the following groups:

- Range Tenure Holders
- Registered Trapline Holders
- Guide Outfitters
- Kelly Lake Metis Settlement Society
- Kelly Lake Cree Nation

- The community of Dawson Creek, Pouce Coupe, Tumbler Ridge, Chetwynd, and Hudson Hope
- Other interested groups or individuals, as required

Expectations pertaining to building relationships with other rights holders that operate on the same land base

Range Tenure Holders

The use of the same land base for Range tenures and forest (conifer and deciduous) harvest by the forest industry has created unique challenges for land management in DPC. The forest industry expresses concerns about livestock effects on regeneration of plantations, and the agriculture industry highlights concerns about the effects of logging on livestock use and availability of forage in an area. This has been an ongoing issue within DPC for several years; however, it remains largely unresolved. The replacement of FSPs offers the opportunity to propose innovative ways to assist in addressing this issue.

It is my expectation that replacement FSPs include consideration of the following:

- a) Proposals for alternative stocking standards to assist in managing range tenure holder values and objectives, or where appropriate to accommodate for potential impacts to plantations from livestock
- b) Proposals for higher levels of permanent disturbance within cutblocks, where appropriate, to assist in managing range tenure holder values and objectives
- c) Proposals for alternative methods for distributing coarse woody debris to assist in managing range tenure holder values and objectives
- d) Commitments to initiate TRAP with range tenure holders prior to block and road development activities so that range tenure holder interests and values can be incorporated at an early stage.

Expectations pertaining to other Provincial projects and initiatives

Water Sustainability Act

The *Water Sustainability Act* and regulations were enacted February 29, 2016 and I expect that Forest Professionals familiarize themselves with this new act and ensure consistency within their FSP and operations. This may include practices that uphold wetland hydrology.

Cumulative Effects Framework

I expect that Forest Professionals familiarize themselves with the Cumulative Effects Framework (CEF) and develop Results and/or Strategies for Replacement FSPs that are consistent with, or complement the values and targets identified within the CEF

(<http://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework>).

Over time it is expected that further management direction on cumulative effects may be coming and it is expected that the FSPs may require amendment to incorporate any revised direction or reflected in future plans.

Roads and Access Management

I expect that Forest Professionals consider the unintended cumulative impacts associated with access resulting from forest road development, as well as other road-related impacts. I expect that forest professionals consider mitigating these impacts through such things as increased coordination, planning and implementation of access management.

Conclusion

In closing, I look forward to the continued success of the relationships you have established with FLNRO staff, the public, First Nations, and stakeholders within the DPC. I encourage you to build upon your successes in the areas of collaboration, innovation and leadership; such as the Peace District Steering Committee, Northeast Forestry Forum, Sustainable Forest Management Public Advisory Groups and other forums to assist you in your development of professional and meaningful FSPs that strive to meet the expectations outlined in this letter.

There are many resources available online to support the development of FSPs, including interpretive bulletins, provincial guidance and early training modules, and are available at the following locations:

- FRPA Bulletins:
<https://www.for.gov.bc.ca/hth/frpa-admin/frpa-implementation/bulletins.htm>
- Administrative Guide to Forest Stewardship Plans:
<https://www.for.gov.bc.ca/hth/frpa-admin/agfsp.htm>
- FRPA Training (original training material):
<https://www.for.gov.bc.ca/code/training/frpa/>
- FSP Tracking System:
<https://www.for.gov.bc.ca/his/fsp/training.htm>

Additional resources can be found in the table attached.

Should you have questions or concerns regarding the content or expectations outlined within this letter I encourage you to contact myself or any of my staff at your earliest convenience.

Sincerely,



Greg Van Dolah
Acting District Manager

Additional Resources

#	Direction, guidance, information	Examples
1	Government objectives	<ul style="list-style-type: none"> • Land Act and FRPA orders and notices
2	Chief Forester standards	<ul style="list-style-type: none"> • Chief Forester standards for seed use • Climate-based seed transfer interim policy measures
3	Non-legal guidance - Provincial	<ul style="list-style-type: none"> • Landscape fire management planning • Provincial timber management goals and objectives • Climate change stocking standards • Fire management stocking standards • Forest health and species selection • Species at risk federal recovery strategies and provincial implementation plans
4	Non-legal guidance – Regional and local	<ul style="list-style-type: none"> • Integrated silviculture strategies • Timber supply analyses and AAC determinations • TSA forest health strategies • Regional climate action plans
5	Monitoring trends and guidance	<ul style="list-style-type: none"> • Forest and Range Evaluation Program (FREP) • Multi resource value assessments (MRVAs)
6	Best available information	<ul style="list-style-type: none"> • Regional extension notes: adapting to climate change • Research (e.g., hydrology, wildlife, riparian, timber, forest health, natural disturbance, invasive species)
7	Planning decision-aids	<ul style="list-style-type: none"> • Drought risk assessment tool • BEC regional field guides