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To: FLNR District Managers; FLNR Range Officers; Bradley, Clayton FLNR:EX

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Subject: Considerations for FSP content related to Natural Range Barriers

District Managers, FSP Review Teams, and Range Officers:

Range Branch is currently updating *FRPA General Bulletin #21 - Natural Range Barriers* with a view to strengthening content related to: the definition of natural range barrier; considerations for FSP content (measures); and, traditional and alternative mitigation options. The updated bulletin may not be finalized for some time; in the meantime, we would like to share the following “Considerations for FSP Content related to Natural Range Barriers” with districts so that this information may be considered in the preparation and review of new FSPs.

In particular, these considerations may be useful information to share/discuss with forest licensees in advance of FSP preparation, and may be useful for FSP review teams as they prepare FSP review checklists. I would like to stress that this information is *voluntary guidance*.

CONSIDERATIONS FOR FSP CONTENT RE MEASURES FOR NATURAL RANGE BARRIERS

Communication and Identification

Elements	Voluntary Considerations for FSP Content
Commitment to notify	1. Commit to notifying affected range agreement holder(s) about planned forestry operations within a specified timeframe.
Notification elements	2. Notify the range agreement holder in writing and follow-up by phone . 3. In the written notification: <ul style="list-style-type: none">○ specify the location of proposed harvesting and road operations (include maps of proposed cutblock/road locations);○ Request comments from range tenure holder(s) by a specified date; and,○ Offer to meet in person to discuss proposed operations (using maps) and their potential implications to natural range barriers. 4. Comments requested from range tenure holder(s) should: <ul style="list-style-type: none">○ identify any natural range barriers that may be impacted by forestry operations;○ specify preferred mitigation actions if there is likely to be an impact; and,○ specify preferences regarding timing of post-operations follow-up (to assess whether operations impacted any natural range barriers), mitigation actions, and post-mitigation follow-up to verify mitigation effectiveness.
Contingency plan	• Include a contingency plan in the event that the range agreement holder does not respond to the initial notification. This should typically involve contacting the district range officer to request comments.
Dispute resolution	• Include a mechanism to resolve disputes with the range agreement holder about whether mitigation is required and/or mitigation options. The district

	range officer or district manager may be able to facilitate resolution of disputes.
Update range information	<ul style="list-style-type: none"> Commit to periodically updating range tenure information in the event that pasture or tenure boundaries, or tenure holders, change over the term of the operational plan, or if an area is no longer being used.

Mitigation and Follow-up

Elements	Voluntary Considerations for FSP Content
Definition	<ul style="list-style-type: none"> To set appropriate context for any mitigation measures, include in the operational plan a definition of ‘natural range barrier’ that is based on mutual understanding with the range agreement holder, and is relevant to the area in question.
Mitigation actions	<ul style="list-style-type: none"> Include mitigation actions the forest licensee will implement if a natural range barrier is removed or rendered ineffective as a result of forest operations. Specify who will implement the mitigation actions, where they will be implemented, and the timeframe for mitigation following the removal or impact to the natural range barrier. Commit to remedial efforts if mitigation proves to be ineffective.
Follow-up	<ul style="list-style-type: none"> Commit to following-up with the range agreement holder after forestry operations have been completed, to ascertain whether natural range barriers have been impacted, and to confirm mitigation actions and their timing. Commit to following-up with the range agreement holder within an agreed-to period of time after mitigation measures have been implemented to verify their effectiveness.
Overall	<ul style="list-style-type: none"> Commit to preparing a mitigation plan that summarizes the above follow-up commitments, mitigation actions, and timeframes. The plan should be agreed-to and signed by the range agreement holder.

Additional information for districts to consider:

- The updated FRPA bulletin will specify that natural range barriers include BOTH range pasture boundaries and any treed riparian areas (that naturally prevent cows from accessing streams/watercourses).
- Although not an element of FSP content, forest licensees are encouraged to request authorizations for any range developments (such as traditional and debris barrier fences) with their cutting or road permit submissions.
- Range Branch is currently working with Pricing Branch to explore opportunities to amend the Interior Appraisal Manual to enable cost recovery for range developments in a cutting authority area. Further direction on this will be incorporated into the updated FRPA bulletin.

I hope you find this information useful. If you have any questions or comments regarding this information, please contact Clayton Bradley at clayton.bradley@gov.bc.ca or 250-861-7224.

Thank you.

Perry Grilz
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