



File: 18045-02

June 27, 2016

**BY EMAIL**

To All Licensees

Dear Sir or Madam:

I am writing to Licensees and BC Timber Sales regarding Forest Stewardship Plans (FSPs) in the Chilliwack Natural Resource District, as a follow-up to the Minister's letter, the Chief Forester's provincial guidance letter, the Forest Practices Board's report<sup>1</sup>, and the ministry FSP training session in April, regarding my expectations on FSP replacements.

The district manager's FSP expectations are not legally binding and constitute policy guidance under FRPA's non-legal realm. As such, the information contained in this letter is intended to provide practitioners further clarity around the principles and process that will be used to decide whether a proposed FSP meets the legal tests in the *Forest and Range Practices Act* (FRPA) and the *Forest Planning and Practices Regulation* (FPPR) (e.g. consistent with government objectives). Over the past decade, there have been substantive changes to the land base, operating environment, best available information, stakeholder interests and public expectations regarding forest stewardship and planning. Given the extent of these changes, FSPs warrant full replacements rather than extensions of the previous plans.

By submitting a replacement FSP, the legal requirement for public consultation is triggered which enables communities, stakeholders, the general public and other affected parties to have a formal opportunity to review and present their perspectives and input on the plan. In special circumstances, however, it may be necessary to request a short term extension without public review if supported by a rationale.

The Association of British Columbia Forest Professionals' (ABCFP) guidance recommends that professionally-prepared documentation in support of proposed FSPs include rationales stating how relevant information (e.g. district manager expectations, best available information, and non-legal guidance) has been considered in the preparation of FSPs. In

---

<sup>1</sup> FPB/SIR/44, "Forest Stewardship Plans: Are They Meeting Expectations?", August 2015:  
<https://www.bcfpb.ca/sites/default/files/reports/SIR44-FSP-Are-They-Meeting-Expectations.pdf>

To All Licensees

reviewing proposed FSPs, there may be a need to request information from a licensee, such as approaches, strategies, metrics, or rationales to support my review of the FSP content against legal approval tests.

Within the context of the above comments, my expectations are categorized into three subheadings: “Opportunities for Improvement”; “New Information Considerations”; and “Next Steps” in the process leading up to FSP submissions.

### **Opportunities for Improvement:**

Although there are many examples of licensees demonstrating diligence and being proactive in engaging and addressing public, stakeholder, and First Nation concerns and interests, there remains room for improvement to build from these efforts and learn from the past, given the changing environment across the land base.

Some of the changing interests include but are not limited to, people’s desire for greater input on proposed forest development; increased environmental concerns; cumulative effects of increasing natural resource activity; water quality, or increasing requirements for species at risk.

Given the above, licensees need to factor in the following:

- *Results, strategies, and measures, and general refinements*- ensure the FSP commitments are consistent with Government objectives; results and strategies are measureable and verifiable; and commitments are clearly written.
- *Stocking standards* - climate change, drought conditions, forest health issues, fire management concerns, and significant wildlife impacts may trigger the need for revised or new stocking standards.
- *Collaborative planning* – forest licence holders should explore a more collaborated and coordinated forest stewardship planning approach to address cumulative hydrological effects, manage strategic cultural values (e.g. cultural landscape feature, sanctuary, etc.), invasive plant management, wildlife habitat management, and enhance stocking standards.
- *Social licence* – there are options to improve engagement with interested or affected parties during the review and throughout the lifetime of FSPs to minimize and address specific and landscape level concerns. There are new options with technology to share and capture development planning to help the public and or stakeholders understand proposed activities and solicit timely feedback, especially at the early engagement and or post-harvest stage. Development planning should consider how harvesting is integrated into recreation values and various other stakeholder’s rights on the landbase. Early engagement is one tool to help achieve this.
- *Public safety* – public use of roads and recreation activities are increasing in the district. Licensees should consider the impact of their operations on access and public

safety both during and after harvest activities as well as any longer term resource management risks (e.g. terrain stability).

**New Information Considerations:**

There is a significant amount of new information available since the last round of FSP approvals. Although not an exhaustive list, key information and guidance at a provincial, regional, and local level is cited below for your consideration in preparing FSPs.

#	Direction, guidance, information	Examples
1	Government objectives	<ul style="list-style-type: none"> <li>• <a href="#">Land Act and FRPA orders and notices</a></li> </ul>
2	Chief Forester standards	<ul style="list-style-type: none"> <li>• <a href="#">Chief Forester’s Standards for Seed Use</a></li> <li>• <a href="#">Climate-based seed transfer interim policy measures</a></li> </ul>
3	Non-legal guidance - Provincial	<ul style="list-style-type: none"> <li>• <a href="#">Landscape fire management planning</a></li> <li>• <a href="#">Climate change stocking standards</a></li> <li>• <a href="#">Fire management stocking standards</a></li> <li>• <a href="#">Forest health and species selection</a></li> <li>• <a href="#">Provincial Timber Mgmt Goals and Objectives</a></li> </ul>
4	Non-legal guidance – Regional and local	<ul style="list-style-type: none"> <li>• <a href="#">Integrated silviculture strategies</a></li> <li>• <a href="#">Timber supply analyses and AAC determinations</a></li> <li>• <a href="#">TSA forest health strategies</a></li> <li>• <a href="#">Regional climate action plans</a></li> <li>• <a href="#">Chilliwack District FSP data and information sources</a></li> <li>• <a href="#">Strategic First Nation Cultural Information</a></li> <li>• <a href="#">Invasive Plant Information for FSP Preparers &amp; Reviewers within the Coast Forest Region</a></li> <li>• <a href="#">Appendix A - FRPA Regulation Species Recommended for FSP Inclusion by Former Coastal Forest District &amp; BEC Zone</a></li> </ul>
5	Monitoring trends and guidance	<ul style="list-style-type: none"> <li>• <a href="#">Forest and Range Evaluation Program (FREP)</a></li> <li>• <a href="#">Multi resource value assessments (MRVAs)</a></li> </ul>
6	Best available information	<ul style="list-style-type: none"> <li>• <a href="#">Regional extension notes: adapting to climate change</a></li> <li>• <a href="#">Research</a> (e.g., hydrology, wildlife, riparian, timber, forest health, natural disturbance, invasive species)</li> <li>• <a href="#">Critical Habitat for Species at Risk (see federal Recovery Planning documents)</a><sup>2</sup></li> <li>• Provincial<sup>3</sup> or Federal<sup>4</sup> <a href="#">Recovery Planning documents</a></li> <li>• <a href="#">Drought risk assessment tool</a></li> <li>• <a href="#">Cumulative Effects</a></li> </ul>

<sup>2</sup> At least three federal Recovery Strategies are approved in parts of the Chilliwack Natural Resource District (e.g. Pacific Water Shrew, Oregon Spotted Frog, Oregon Forestsnail). Information in April 2016 from Environment Canada indicates 56 other Recovery Strategies are expected to be approved in BC over the next three years (several of these will occur in the Chilliwack District). This does not include Marbled Murrelet or Northern Goshawk *laingi*, for which the province is developing Implementation Plans.

<sup>3</sup> [Recovery Planning Documents Table - Ecosystems Branch](#)

<sup>4</sup> <http://www.sararegistry.gc.ca/default.asp?lang=En&n=24F7211B-1>

#	Direction, guidance, information	Examples
		<ul style="list-style-type: none"> <li data-bbox="732 239 1068 268">• <a href="#">Water Sustainability Act</a></li> </ul>

In relation to the above items, take into consideration the following:

*Item 4 – non legal guidance – regional and local*

- *Fraser Timber Supply Area (TSA) Rationale for Allowable Annual Cut (AAC), February 2016* - consideration of latest Chief Forester’s recommendations especially with young forest stand harvesting and low harvest performance in older hemlock balsam stands.
- *Forest health* – annual reports continue to show impacts from several pests or forest health issues. These factors and others should be given consideration for FSP preparation.
- *First Nations* – consideration for site and landscape level First Nation cultural information is important as early as possible in the planning process.

*Item 5 – Monitoring trends and guidance*

- *FREP/MRVA* – consider the importance of retention around small streams which may be critical for water quality impacts from logging practices of the past few years. Specifically, minimize soil disturbance near streams; retain understory vegetation and non-merchantable trees for cut bank stability wherever operationally feasible; and avoid leaving introduced woody debris on small streams that could create stream blockages post harvesting.

*Item 6 – Best available information*

- *Wildlife* – results and strategies are not required for wildlife species that have Orders that fulfill the FPPR Section 7 or *Woodlot Licence Planning and Practices Regulation* (WLPPR) Section 9 Wildlife Notices: these include WHAs for grizzly bear, coastal giant salamander, tall bugbane, pacific tailed frog, spotted owl, and Ungulate Winter Range Orders for mountain goat, black-tailed and mule deer. However, results and strategies are required for pacific water shrew<sup>5</sup>.
- *Other species and recovery plans* - available on the Federal Species at Risk Public Registry and Provincial web sites as noted above (e.g. Marbled Murrelet, Northern Goshawk *laingi* subspecies, Oregon Spotted Frog, etc.). It is important for professionals to consider all aspects of the FSP and associated forest development planning that may influence habitat for other species not listed in FPPR Section 7 or WLPPR Section 9 Wildlife Notices.

---

<sup>5</sup> Expected to be fulfilled once a currently proposed Order is approved.

To All Licensees

- *Forest Planning and Practices Regulations (FPPR) Sections 21 and 22* - public comments must be considered, and the actions taken to address them must be included as part of the FSP submission to the District Manager. To expedite the FSP review process, the review and comment summary package should be submitted in a consistent format. The district has a communication summary template that is available, upon request.
- *Stakeholders/persons with rights who may be affected by the proposed FSP* – these groups must have an opportunity to review and comment on the plan. The district has information about stakeholder contacts which is available upon request. Stakeholders that are important may include other forest licensees, land and water rights holders, guide outfitters, commercial recreation groups, trappers, adjacent private land holders, and community/ rate payer groups. Where a specific forest stewardship related concern does not fit within a result or strategy framework, the response to the above referenced stakeholder’s concern or interest will be important in assessing the effectiveness and completeness of stakeholder engagement.

This information may not form part of the legal commitments of the FSP, but may accompany the FSP submission as supporting information or be available upon request at the FSP review process.

**Next steps:**

Along with this expectation letter, the planning process should include an opportunity to have information sharing meetings with licensee(s) to further discuss the district manager’s expectations. A licensee or forest professional initiated meeting to develop a common understanding of areas of focus for a replacement FSP will be beneficial in supporting a streamlined and informed process. If licensees would like to coordinate the development of common FSP approaches, the district is willing to support and facilitate this desire. Additional topics can include the licensee’s perspective on these expectations, licensee’s plans and timelines, and the district’s process for reviewing FSPs. The district will make available any district review checklists or stakeholders lists that may be helpful to those preparing FSPs.

I trust that a high degree of effort and communication will continue to occur when FSP replacements are developed. If you have any questions on the above, please contact Lucy Stad by phone at 604-702-5763 or email at: [Lucy.Stad@gov.bc.ca](mailto:Lucy.Stad@gov.bc.ca) .

Sincerely,

Allan Johnsrude, RPF  
District Manager  
Chilliwack Natural Resource District