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May 17, 2017

Dear Fort Nelson 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 stewardship of Provincial Crown Land, cultural and natural resources, with a vision of economic prosperity and environmental sustainability.

This District Manager (DM) Letter of Expectations regarding Forest Stewardship Plans (FSPs) is intended to align with the FLNRO vision, build upon the March 2016 Chief Forester's Guidance, as well as provide local Fort Nelson Natural Resource District (DFN) content. As the Delegated Decision Maker (DDM), I set these expectations in consideration of the unique operational circumstances of DFN and in consideration of the changing landscape and forest resource profile as a result of the impacts of forest health, fire, and climate change.

As forest professionals, I expect that you manage the landscape and values of DFN consistent with the *Forester 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.

Expectation Regarding Replacement FSP vs Extensions to Existing FSPs

In accordance with the March 2016 guidance from the Chief Forester regarding replacement of FSPs, FSPs whose terms are expiring should be replaced with a new plan. The FSPs are approximately 10 years old and should now incorporate new information and new forest

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management considerations in their results, strategies, measures and stocking standards. I recognize that limited extensions to existing FSPs may be required to allow for the development of new replacement FSPs that meet the requirements of this letter.

Collaborative Planning

To more appropriately assess the cumulative effects 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. Also, I encourage the development of multi-signatory FSPs. 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. 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.

This replacement FSP process allows the opportunity to take a strategic look at the Forest Development Units (FDU) identified within each plan. 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.

Roads and Access Management

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

Clarification Regarding Results, Strategies and Measures Being Measurable and Verifiable

In accordance with the March 2016 guidance from the Chief Forester and as identified within the Forest Practices Board report *Forest Stewardship Plans: Are They Meeting Expectations?* (August 2015) ([FPB 2015 Report on FSPs](#)), replacement FSPs must include Results and/or Strategies for Objectives Set by Government. Each commitment in an FSP must clearly specify if 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 objectives set by government and are measurable or verifiable. All Measures, including, but not limited to those for Natural Range Barriers and Invasive Plants, will be evaluated against two approval tests: whether they are effective, and whether they are measureable or verifiable. For more information on expectations for measureable and verifiable, please refer to the C&E Program Staff Bulletin #12 *Guidance to C&E Program Staff on the Assessment of Measureable Or Verifiable Results Or Strategies Within A Forest Stewardship Plan (FSP)* ([C&E Program Staff Bulletin #12](#)).

Innovation in Development of Results and Strategies to Allow for Flexibility and Reduced Administrative Burden.

FSPs within the DFN have previously identified results or strategies largely with singular goals in mind for each Objective Set by Government. It is my expectation that this replacement FSP 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 conditions. The Sustainable Forest Management Plan for the Fort Nelson Defined Forest Area contains several examples of innovative indicators and targets to achieve identified objectives, 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 is warranted, *Forest Planning and Practices Regulation* (FPPR) section 12 is the appropriate instrument and those 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's 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 Nation's rights, assessment of cumulative effects on values, and the legal requirements in the *BC Water Sustainability Act 2016*. As a result, I expect the following information be considered as new information or best management practices for managing FRPA values within the DFN.

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 by the Forest and Range Evaluation Program (FREP) ([FREP Home Page](#)) and Multiple Value Resource Assessments (MRVA) ([MRVA Reports](#)).

Objective Set By Government For Timber

I expect that forest professionals consider the policy *Provincial Timber Management Goals and Objectives* ([Provincial Timber Management Goals and Objectives](#)) which provides context and guidance for planning at the local level on how timber is managed.

Objectives Set By Government For Biodiversity 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 Wildlife

Caribou

Boreal caribou were recognized as Threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) in May 2002. As a result, the population was listed as Threatened on Schedule 1 of the *Species At Risk Act* (SARA) in 2003. The Province of BC is committed to recovering the Boreal caribou populations. Further to the 2010 GAR Orders for Boreal Caribou, I expect the following document be used as supplementary management considerations for management in boreal caribou habitat: the 2011 *Implementation Plan for the Ongoing Management of Boreal Caribou (Rangifer tarandus caribou pop 14) in British Columbia* ([2011 Implementation Plan for Boreal Caribou](#)). It is expected that further management direction will be coming and that the FSPs will require amendment to incorporate any revised implementation plans.

Moose

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 resource management activities and the potential effects to moose habitat and populations. I expect Forest Professionals and licensees to consider moose management in the timing of operations, placement of wildlife tree patches, and improved moose habitat management as better information becomes available. Local FLNRO staff will work with regional counterparts and First Nations to identify appropriate areas and strategies for moose habitat management.

Objectives Set By Government For Cultural Heritage Resources

Since the transition to the FRPA, a greater understanding of Cultural Heritage Resources (CHR) has been gained by Forest Licensees and the Province. This greater understanding of these values allows for improved management of these resources. I expect licensees to work with First Nations to identify CHR that are of known importance, such as culturally significant areas, within the DFN, and that the replacement FSPs contain specific management consideration based on the type of resource.

Measures To Prevent The Introduction and Spread of Invasive Plants

I expect forest professionals to increase their awareness and accountability to prevent the spread of invasive plants. I expect that the *Forest and Range Practices Act Invasive Plant Measures: Considerations for Plan Preparers and Approvers (2016)* ([Considerations for Invasive Plant Measures](#)) is used as guidance on measures for invasive plants. Additionally, I expect that any other information sources such as *Best Practices for Managing Invasive Plants on Oil and Gas Operations a Pocket Guide for British Columbia's Oil and Gas Workers 2013 Edition* be reviewed for possible inclusion in results or strategies. 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,

encroachment and removal treatments. Over time further management direction may be coming and it is expected that the FSPs may require amendment to incorporate any revised guidelines.

Stocking Standards

I expect forest professionals to consider the *Fire Management Stocking Standards Guidance Document 2016* ([Fire Management Stocking Standards Guidance](#)) and the *Updates To The Reference Guide for FDP Stocking Standards (2014): Climate-Change Related Stocking Standards (draft)* ([Update to the Reference Guide for FDP Stocking Standards](#)) I expect that professionals remain up to date with stocking standard changes and guidance as it becomes available.

I expect FSPs to propose innovative stocking standards to assist in addressing known challenges within DFN for values such as mixed wood stands, conifer regeneration in riparian areas, and deciduous management. In addition, the stocking standards need to assist in supporting wildlife habitat management objectives, especially for boreal caribou, when managing early seral patches. When contemplating innovative stocking standards, I expect Forest Professionals to first have conversations with district staff prior to any submission.

Public Review and Comment

The FSP is the only operational plan that must be made available for public review and comment, and is the only operational plan that requires government's approval. In the 2015 report on FSPs, the Forest Practices Board (FPB) identified dissatisfaction from First Nations, the public, various tenure holders and stakeholder groups on the limited availability to review and comment on operational proposals. As a result, the public's understanding of FSPs is poor and that affects their ability to provide meaningful input.

Review and comment opportunities are important for the public and other tenure holders in the FSP area, or businesses such as commercial recreation operators, which may be affected by forest activities enabled by the FSP. It is my expectation that forest professionals enable the public's ability to provide meaningful input by ensuring that the FSP wording is clear, use appropriate level of non-legal language, and does include all necessary information. I also expect forest professionals to make commitments in the replacement FSPs to provide additional information and opportunities for public review and comment at least annually, whenever harvesting or road building activities are planned.

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

- Registered Trapline Holders
- Guide Outfitters
- Transporters
- Northern Rockies Regional Municipality
- Range Tenure Holders
- Other interested groups or individuals as required.

First Nations Information Sharing

I expect forest professionals to make reasonable efforts to meet and engage with First Nations regarding the replacement FSP content. In the past, First Nations have expressed their dissatisfaction on the limited content made available for their review and comment on operational plans. I encourage forest professionals to meet with each individual First Nation that would be affected by forest activities enabled by the FSP and to discuss an approach for information sharing that will best suit the needs of that First Nations community.

Climate Change

I expect that forest professionals consider FLNRO's *Forest Stewardship Action Plan for Climate Change Adaptation 2012-2017 (February 27, 2012)* ([Forest Stewardship Action Plan for Climate Change](#)) and *Climate Patterns, Trends, and Projections for the Omineca, Skeena, and Northeast Natural Resource Regions, British Columbia (2016)* ([Climate Pattern Trends and Projections](#)).

Provincial Expectations

Water Sustainability Act

The *Water Sustainability Act* and regulations were enacted February 29, 2016 and I expect forest professionals familiarize themselves with this new act and ensure consistency within their FSP and operations.

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 with the CEF (Cumulative Effects Framework Home Page).

Conclusion

In closing, I look forward to the continued success of the relationship you have established with FLNRO staff. I would also like to acknowledge that there has been no major forest industry harvest activity since 2008, and look forward to your success in re-engaging to rebuild relationships with the public, First Nations and stakeholders within the DFN. I encourage you to build upon your successes in the areas of collaboration, innovation and leadership: such as the Sustainable Forest Management Public Advisory Group 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 essential information, including the C&E Program Staff Bulletin #12 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>

Should you have any questions or concerns regarding the content or expectations outlined within this letter, I encourage you to contact myself or Mary Viszlai-Beale at your earliest convenience.

Yours truly,

A handwritten signature in cursive script that reads "Barry Dobbin".

Barry Dobbin
Acting District Manager
Fort Nelson Natural Resource District