



File: 18045-20/FSP Renewal 2016

June 2, 2016

**E-MAIL**

To: All Licensees and Forest Professionals Operating in the Cascades Natural Resource District who are renewing Forest Stewardship Plans (FSPs)

**Re: District Manager Letter of Expectation Regarding Forest Stewardship Plans**

The Ministry of Forests, Lands and Natural Resource Operations (FLNRO) is responsible for the stewardship of Provincial Crown land and natural resources, and protection of BC's archaeological and heritage resources. Forest Stewardship Plans (FSPs) are one mechanism enabled through the *Forest and Range Practices Act (FRPA)* that the Ministry uses to deliver on its vision of environmental sustainability and economic prosperity.

In the decade since most FSPs were first approved, the landscape has changed and we have gained much experience, and improved our understanding of forests complexities and societal interests. As a result, I believe it is imperative that forest professionals manage beyond the legal objectives to realize environmental sustainability and appropriate social management of the *FRPA* values.

This District Manager Letter of Expectation regarding FSPs is intended to align with the FLNRO vision and to provide information and expectations that are in addition to the March 2016 Chief Forester Guidance.

As forest professionals you manage the forest related landscape and values in the Cascades Natural Resource District (CNRD) consistent with the *Foresters Act* and other forest related legislation. You are aware of your legal and ethical requirements. Therefore, the attached expectations, while not exhaustive, highlight key areas of concern that I believe warrant particular consideration when preparing replacement FSPs.

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Ministry of Forests, Lands and  
Natural Resource Operations

Cascades Forest District

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## All Licensees and Forest Professionals

My staff will work to assist you in understanding the Chief Forester Guidance as well as the expectations contained in this letter. They have also been instructed to consider the Forest Practices Board report, *Forest Stewardship Plans: Are They Meeting Expectations?* and to consider the methodology used by the report's author to determine that Results, Strategies and Measures contained in your FSPs, are both measurable and verifiable.

My staff can also support your FSP development as you address specific areas of concern by arranging for Provincial experts (e.g. Ecosystem Specialists) to be available for discussion and/or training purposes. I encourage you to take advantage of this opportunity.

The following expectations are not legally binding but rather constitute policy guidance for the development of your FSP.

### **Cascades Natural Resource District Expectations**

#### **First Nations**

While legislation provides for sharing FSPs with First Nations it is my expectation that First Nations will be involved early and throughout the FSP development process. First Nations should be meaningfully involved and licensees should actively seek First Nations support and endorsement for your Results and Strategies.

With specific reference to Cultural Heritage Resource (CHR) values, First Nations should support your approach to CHR Results and Strategies and recognize that the implementation of these will help ensure their cultural values are conserved and protected.

Your FSP should also recognize and demonstrate understanding of the agreements that government has with First Nations in the Merritt and Lillooet timber supply areas. Agreements such as *Forest Consultation and Revenue Sharing Agreements* and the *Land and Resource Decision Making Pilot Project* (aka Shared Decision Making Pilot) with the Nlaka'Pamux Nation Tribal Council which is developing new shared decision making processes through which FSPs will be reviewed and vetted as well as subsequent operational forestry approvals and issuance. Licensees are to discuss these new approaches with the local FLNR First Nations Relations staff for guidance on how to proceed with FSP and operational plans First Nation information sharing.

#### **Public Review and Comment**

In their report on FSPs, the Forest Practices Board identified a significant failing with respect to public review and comment. The public seeks better opportunities to review and understand the content of FSPs and the forest management intent they contain. I expect that your FSP will be written in a style that is easy for the public to comprehend and that there will be enhanced opportunities for the public to review and comment on both your FSPs and your subsequent operational forest management activities.

I suggest that it is also appropriate to commit to offer the public ongoing, regular opportunities to review your FSPs and forest management activities- spatially and in text form. This will provide you with important opportunities to explain your forest development activities to a concerned public.

### **Defaults and Exemptions**

It is my expectation that licensees will either commit to default practices in the Forest Planning and Practice Regulation or, propose alternative results and strategies (i.e. your FSP should not propose modified default results and strategies). Also, “self-exemptions” from results and strategies should not be proposed unless they are contained or limited to specified circumstances and particular areas (see *FRPA* bulletin 25 for guidance on flexibility options).

### **Best Practices**

Forest Stewardship Plans (FSPs) should take into account any best practices that have been shared, discussed and ratified at local Cascades Natural Resource District (CNRD) planning tables. For example, the “Old Growth Management Area Guidance Thompson Okanagan and the Cascades District Agreement for Managing OGMA Consolidation Mapping as Approved by DOIT Committee Members on July 15, 2013” is to be considered.

### **Climate Change**

I expect Climate Change adaptation and mitigation strategies to be considered in your FSP. The documents: “Adapting Natural Resource Management to a Changing Climate in the Thompson Okanagan Region: Considerations for Practitioners and Government Staff and the, Forest Stewardship Action Plan for Climate Change Adaptation 2012-2017 February 27, 2012” and the “Climate Action Plan: Thompson Okanagan Region 2016 – 2020” will be considered.

### **Roads and Access Management**

Access resulting from forest development can lead to unintended cumulative impacts. I expect forest professionals will consider mitigating these impacts through such approaches as increased coordination, planning and implementation of access management with other forest licensees and non-licensees access users, including First Nations communities, where appropriate.

### ***Water Sustainability Act***

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

### **Forest Health**

I expect that the annually revised CNRD Forest Health Strategy will be reviewed to aid in the development of new FSP content.

### **Fuel Management and Fire Management Stocking Standards**

The CNRD is dominated by fire prone ecosystems, with many values at risk. CNRD working in partnership with Wildfire Services Branch develops annual Fuel Management Plans for the district. These plans incorporate measures and actions to reduce fuels in the Crown land/rural interface and create landscape level barriers and strategic fire suppression control points in mid to upper elevation areas. I will be seeking industry cooperation in assisting the district and Wildfire Services Branch in achieving these objectives.

## All Licensees and Forest Professionals

I expect that licensees will conduct harvesting operations within the two kilometre interface zone around communities to balance all values unique to these areas, including fuel reduction and scenic considerations.

Our Ministry has recently released *Guidance on Fire Management Stocking Standards*. I expect that forest professionals will consider this guidance for their FSPs as well as increase their awareness of fuel loading and fuel management. The most current district fire management plans, as well as local community wildfire plans should be consulted and addressed where appropriate.

### **Invasive Plants**

The Forest Practices Board was critical of the FSP measures for invasive plants. I expect forest professionals to increase their awareness and address their responsibility to prevent the spread of invasive plants by providing more robust measures. *The Invasive Plants Prevention Guidelines for FRPA Operational Plans* and the *Habitat Susceptibility to Invasive Plants by BEC Zone* are considered best available information. Key to preventing expansion of invasive plants are measures that support the training of operators and staff, preventative practices, monitoring, and treatments when necessary.

### **Natural Range Barriers**

The Forest Practice Board was critical of FSP measures for Natural Range Barriers (NRB) finding the measures to be unnecessarily vague and lacking clear commitments to address NRBs. Removal of, or ineffectiveness of range barriers after harvesting has been an issue in CNRD and was the subject of my direction in a letter dated August 2010 regarding “Natural Range Barriers on Range Pasture, Tenures and District’s Boundaries”. In addition to my 2010 direction, I expect forest professionals to demonstrate an awareness of *FRPA* General Bulletin Number 21 Managing Section 48 of the *FRPA* – Natural Range Barriers and reflect best practices for NRB in your FSPs.

### **Species at Risk**

Best management practices for Species at Risk such as Williamson’s Sapsucker, have been shared and I expect that the implementation of these management practices will be addressed in FSPs. It should be noted that the federal recovery strategy for Williamson’s Sapsucker was released in 2014 and Critical Habitat has been identified in this strategy.

### **Dry Belt Fir Ecosystems**

Dry Belt Fir Ecosystems represent a complex and challenging harvesting opportunity in CNRD. These ecosystems have multiple values, often competing, and are managed for timber production, wildlife habitat, forest health, fire resiliency, forage production, recreation and range use.

When developing FSPs, I expect forest professionals to be mindful of the current science and the competing values represented by these ecosystems. Stocking standards and appropriate silviculture systems for dry belt fir stands must be consistent with these expectations. FLNRO regional specialists are available for discussion and training purposes to aid in your FSP development with respect to Dry Belt Fir areas.

### **Watershed Management**

Management of Cumulative Watershed Effects to maintain water quality and quantity, timing of flows, stream channel dynamics, as well as aquatic ecosystem integrity, species at risk, fish and fish habitat must be recognized and managed for in your FSPs. I expect that forest professionals consider the best hydrology science and assessment guidance when considering the combined effects of forestry activities, other land uses and users, within all CNRD watersheds.

### **Stocking Standards**

I expect forest professionals to address emerging forest health issues, fire management considerations, or emerging effects of climate change in their FSP stocking standards. Forest professionals should consider the *Updates to the Reference Guide for FDP Stocking Standards* (2014). I expect that professionals remain up to date with stocking standard changes and guidance as it becomes available.

### **Stand and Landscape-level Biodiversity**

Natural disturbance patterns at a stand and landscape-level help 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, stand level biodiversity and coarse woody debris, and build upon the existing coarse-fine filter legal designations and regulations that exist under *FRPA* or the *Land Act* where necessary.

### **Collaborative Planning and Cumulative Effects**

The combined effect of the activities of multiple licensees affects both aquatic and terrestrial values. Aquatic values are strongly influenced by factors of hydrology and geomorphology. Current watershed assessment guidance, new hydrologic research and cumulative effects assessment and monitoring suggest that the watershed scale is best suited to consider the effect of both past and planned forestry activity. Terrestrial values associated with forest biodiversity are also strongly affected by the amount and pattern of forest seral stages over the broader landscape and require a broader focus to achieve positive outcomes for these values.

Given our growing knowledge and recent results from cumulative effects assessment, I believe there is a mounting case for collaborative planning across watersheds or at least within timber supply areas. On this basis I believe a case can be made for the development of a single FSP shared by licensees within a timber supply area. While I am hopeful for such an approach I recognize that licensees may prefer their own plans. If this is the case, I expect that licensees strive for the highest level of consistency possible through coordination and collaboration with other licensees.

The *Cumulative Effects Assessment for the Merritt Operational Trial – March 2015* provides information with respect to Fish Habitat, Mule Deer, Moose, Visuals, Grizzly Bear, Old Growth Management Areas and Watershed Condition. This document and its recommendations for the resource sector should be considered during FSP development.

All Licensees and Forest Professionals

**Results of Natural Resource Monitoring**

I expect that forest professionals will continue to improve their management of the *FRPA* values and use tools such as Forest and Range Evaluation Program and Multiple Resource Value Assessments to learn and improve on practices.

**Integrated Silviculture Strategy**

Licensees should be aware of the Integrated Silviculture Strategy (ISS) currently being developed for the Merritt Timber Supply Area post TSR 5. Licensees should participate in the ISS development process and FSPs should consider the direction and recommendations that may be available from the ISS albeit in the future.

Finally, I encourage licensees to heed the advice in the Forest Practices Board audits and reports and commit to ensuring that results, strategies and measures are measureable and verifiable.

I look forward to the continued success of the relationships you have established with FLRNO staff, the public, First Nations, and stakeholders within CNRD. I encourage you to build upon your successes in the areas of collaboration, innovation and leadership. The recent establishment of a Licensee FSP subcommittee bodes well for the creation of an FSP(s) that is complete, collaborative and in the best position to address the *FRPA* values, objectives, cumulative impacts, First Nations and the broader societal interests. I wish you well in moving forward on this important process. My staff are ready and willing to assist.

My letter, attachments, and all referenced documents, including the Forest Practices Board report, can be found on the FTP site located at [https://www.for.gov.bc.ca/ftp/DCS/external/!publish/FSP\\_Renewals%202016/](https://www.for.gov.bc.ca/ftp/DCS/external/!publish/FSP_Renewals%202016/).

Yours truly,

A handwritten signature in black ink, appearing to read "Charles van Hemmen", with a long horizontal line extending to the right.

Charles (Chuck) van Hemmen, RPF  
District Manager  
Cascades Forest District