



File: 18045-01

June 30, 2016

To: Forest Licensees and BC Timber Sales operating in the
Coast Mountains Natural Resource District

**Re: Coast Mountains Natural Resource District Manager Letter of Expectations
Regarding Forest Stewardship Plans (FSP)**

Dear Forest Licensees:

At the direction of the Minister's March 2016 letter and Chief Forester (CF) March 2016 Forest Stewardship (FSP) Guidance to Delegated Decision Makers (DDM), and in response to the Skeena Region FSP Workshop May 2016, the following expectations are intended to provide transparency regarding what I believe is necessary to consider when preparing and adjudicating a replacement FSP in the Coast Mountains Natural Resource District (CMNRD).

In the decade since FSPs were first approved within CMNRD, the pressures on the land base have changed as a result of global markets, increased natural resource development activities, heightened pressure for fibre utilization, new land use orders, and increased progress in First Nation reconciliation with the Crown. As a result, I expect that licensees will develop replacement FSPs to ensure that their FSP content considers the current condition of the landscape.

In preparing FSPs on a licensee's behalf, I expect that the forest professionals apply the experience they have gained since the initial FSPs were drafted, feedback provided to licensees over the term of their FSP, and that the collaborative knowledge of forest professionals and licensees is incorporated into results or strategies to ensure that government objectives continue to be achieved. Additionally, I expect that forest professionals collaborate with each other and subject matter experts who have intimate knowledge of best management practices, monitoring results and emerging initiatives within their forest development units. I encourage deliberate, early dialogue with the DDM, district review team, and overlapping FSP holders operating within a similar boundary prior to development of plan content.

As the DDM, it is my responsibility to consider the representations from those who may be affected by decisions and address the adequacy of First Nations consultation and stakeholder/public engagement. I expect that FSP holders are engaging First Nations early in the development of their FSP to ensure First Nations are informed of the operational aspects that may impact their Aboriginal interests. Additionally, I expect that FSP holders will develop results or strategies to work with affected parties throughout the duration of the proposed FSP. First Nations, stakeholders and the public should be able to identify areas

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where the FSP relates to their area(s) of interest through appropriate scale, descriptions, and/or use of common place names. With respect to Treaty Nations, I expect plan preparers to appropriately reflect the established treaty title and rights and explain any impact thereto.

I rely upon forest professionals to provide supporting information to demonstrate that “results” or “strategies” are consistent with all legal requirements. For each result or strategy, I expect that:

- each “result” in an FSP is comprised of *measurable* or *verifiable outcomes in relation to the prescribed extent* to objectives set by government and other objectives established under FRPA;
- each “strategy” in an FSP is comprised of *measureable* or *verifiable* steps or practices that will be carried out in respect to objectives set by government and other objectives established under FRPA;
- clear descriptions of the *situations and circumstances that determine where in a forest development unit (FDU) the “result” or “strategy” will be applied*; and,
- default practices listed in the Forest Planning and Practices Regulation (FPPR), where used, must be either followed, or alternative results or strategies that better meet local conditions are proposed. Self-exemption scenarios or situations where default practices or results/strategies will not be followed are not acceptable.

In addition to current legislative requirements, I consider the following factors to be significant and worthy of consideration in the development of results and strategies for replacement FSPs.

- The interests of the public and other affected stakeholders. The Northwest is subject to increasing industrial development activities and proposals on the land base. I expect licensees to consider opportunities to make timely information readily available to the public and all stakeholders on site level development plans, as supplemental information to FSP’s (e.g. current operating plans publically available on the district website).
- First Nations Aboriginal interests and Government’s objective of reconciliation. In addition to Nisga’a, there are First Nations actively involved in treaty and /or strategic engagement agreement negotiations, including two that have reached an Agreement in Principle for Treaty. I expect that licensees and ministry staff will continue to be proactive in following all government to government engagement agreements and consultation protocols for meaningful consultation to occur.
- New monitoring information provided through Forest and Range Evaluation Program (FREP) and Multiple Resource Value Assessments (MRVA) applicable to the values listed under FRPA. I expect the FSP supporting documentation to outline how these findings were considered when developing results and strategies for replacement FSPs.
- The effect of climate change on forest ecosystems. I expect licensees will consider how stocking standards could incorporate anticipated ecosystem changes and species migration.
- Cumulative Effects. In response to the Auditor General’s review of cumulative effects management in this region, the Skeena Region is developing a cumulative effects

framework. As the DDM, I will consider the cumulative effect of operations going forward and factor this consideration into my decisions.

- The ability of overlapping tenure holders to exercise their rights and meet obligations. Currently, an Operating Area Agreement assists signatory licensees to share 5-year operating plans and there has been good work by licensees to jointly develop some FSP results and strategies. While I encourage licensees to continue to do this, in the interest of efficiency, I urge licensees to seriously explore developing one multi-signatory FSP per management unit(s).
- Land use plans have been developed for most of the district and I expect that the legal and non-legal elements of these plans to be reflected in FSPs, as appropriate.
- Factors in timber supply reviews that influence Allowable Annual Cut. I expect licensees will consider these factors, such as decadent stands with high percentage of pulpwood without market, as well as the district's second growth and cedar management strategies in designing FSP results and strategies.
- Species at Risk requirements in federal recovery strategies and provincial implementation plans. I expect that licensees will design results and strategies for legally established objectives for species at risk, and where objectives are not yet established to consider best management practices where available in managing for these species.
- Research papers on species and ecosystems relative to the CMNRD. I expect plan preparers to continue to stay current with research documents relevant to their areas of operation and incorporate research findings as appropriate into results and strategies related to objectives set by government.

Furthermore, I am receptive to considering new and innovative results and strategies that achieve higher level objectives as long as it is based on science and a professional rationale is provided. I expect forest professionals to consider the above noted and other factors that may impact resource management, including, but not limited to, the sources of information listed in this letter.

In closing, I look forward to the continued success of the relationships you have established with district staff, the public, First Nations, and stakeholders within CMNRD. I encourage you to build upon your strengths in the areas of collaboration, innovation, and leadership.

Yours truly,



Barry Dobbin, RPF
District Manager
Coast Mountains Natural Resource District
Ministry of Forests, Lands and Natural Resource Operations

Source of information:

- Steve Thomson Minister Letter “Re: The renewal of forest stewardship plans” (March 8, 2016)
- Dianne Nicholls, CF “Re: Guidance on the replacement of forest stewardship plans” (March 2015)
- The Forest Practices Board Report – Forest Stewardship Plans: Are they Meeting Expectations, August 2015
- Minister letter Re: Direction on approval of Forest Stewardship Plans (FSPs) in the Great Bear Rainforest plan area (January 2016)
- Kalum Resource District: Guiding principle and considerations when planning the harvest of second growth (June 28, 2011)
- District Manager Policy - Utility Corridors Impacts to Visual Quality Polygons (2014)
- Land Use Plans and/or Sustainable Resource Management Plans (Kalum LRMP, Kalum SRMP, MAPP, Nass SRMP, Cranberry SRMP, Kalum (Kiteen) SRMP)
- Long-term recovery of forest structure and composition after harvesting in coastal temperate rainforests in northern British Columbia (LePage and Banner, 2013)
- MRVA Report <<https://www.for.gov.bc.ca/hfp/frep/publications/mrva.htm>>
- FREP Report <<https://www.for.gov.bc.ca/hfp/frep/index.htm>>
- Kalum TSR, Nass TSR, North Coast TSR, Pacific TSR, TFL #1 TSR, TFL #41 TSR
- Regional Executive Director Goshawk Expectations Letter (May 2016)