

To: All forest licensees and forest professionals

Re: Skeena Stikine Natural Resource District Manager FSP Expectations

Following direction provided to me by the minister and the chief forester, I am providing you with details of my expectations for Forest Stewardship Plans (FSP).

These expectations are intended to provide transparency to my considerations of key forest management topic areas when adjudicating replacement FSPs. I do not intend this letter to provide an exhaustive list of all content requirements for FSPs, but to focus on areas where changes in circumstance, improved knowledge, or the observation of practices signal that increased attention or improvements to FSPs is warranted. I may elect to provide more specific expectations for individual FSP's on a case-by-case basis.

FSP Replacement at Term Expiry

In the decade since FSPs were first approved within the Skeena Stikine Natural Resource District (DSS), forest management circumstances have substantially changed as a result of factors including forest health issues related to ongoing climate change, new land use orders, cumulative impacts of multiple developments and natural disturbances, and increased progress in reconciling First Nations and Crown interests. Government and qualified resource professional understanding of best practices for managing for specific values and legal objectives has also changed as results from resource value monitoring initiatives are becoming available. Consequently, I consider it to be an appropriate time for the development of replacement FSPs to incorporate new information and new forest management considerations in results, strategies, measures, stocking standards and/or the best management practices captured to FSP Supporting Documentation.

A license holder has the legal right to request a FSP extension. Per *Forests and Range Practices Act (FRPA)* section 6(2) I have discretion to extend the FSP for a term not to exceed 5 years if I am satisfied that prescribed and discretionary approval tests are met. My intent is to limit the term of any such extensions to 8 months, which is the period of time I consider reasonable for a license holder to prepare a replacement FSP.

FSP Preparation

When preparing a FSP, I expect that forest professionals will bear in mind the sound management of all forest values consistent with *Foresters Act* and the Association of British Columbia Forest Professionals (ABC FP) code of ethics, practice standards, guidelines and bylaws. I also expect that the FSP will address all legal requirements in the *Forest and Range Practices Act (FRPA)* and its regulations, as well as consider pertinent government objectives, approved policies, policy guidance, best available information, and professional guidance.

I expect forest professionals to incorporate the experience they have gained since the initial FSPs were drafted, feedback received over the term of the FSP, and the collaborative knowledge of forest professionals and licensees into commitments to ensure government objectives continue to be achieved. I expect that forest professionals will consider their scope of practice and will collaborate with each other and with subject matter experts who have intimate knowledge of best management practices, monitoring results and emerging initiatives within their forest development units.

In setting these FSP preparation expectations, my intent is to encourage deliberate, early dialogue between forest professionals as plan content is developed, submitted and reviewed. I consider respectful exchange of ideas and comments between forest professionals to be a required and healthy part of our collective responsibilities to plan and provide oversight to forest management activities.

First Nations, Stakeholders and Public Engagement

Understanding of the Province's relationship with First Nations is continuously advancing, with both parties seeking to better understand the nature of aboriginal rights and of claims to aboriginal title. The Province has committed through the *New Relationship* to proactively work to reconcile First Nation interests with those of the Crown. This work takes various forms, more recently through direct government to government negotiations leading to agreements on strategic engagement or on facets of reconciliation. Forest professionals can expect this work to continue and through it, to learn new process or opportunities by which you can most effectively engage with First Nations.

A heightened understanding of the criteria for establishing aboriginal title was recently defined through the Supreme Court of Canada's *Tsilhqot'in* decision. Licensees and Forest Professionals both should take note of this, and seek to improve their understanding of areas where First Nations have traditionally resided in or used forest resources, and of how forest operations may affect these interests. I expect that FSP holders will engage First Nations early in the development of their FSP and wherever possible I urge you to collaboratively develop your plan content to ensure First Nations are both informed of the operational aspects that may impact their Aboriginal interests and provided an opportunity to participate in the management of them. Ultimately, as the delegated decision-maker (DDM), it is my responsibility to assess the adequacy of First Nations consultation and the sufficiency of accommodation measures where adverse impacts to First Nation interests may occur. Your efforts here will significantly assist me in making such determinations.

It is also my responsibility to consider the representations from those who may be affected by decisions and of the adequacy of stakeholder/public engagement. This was identified as one of the key opportunities for improvement by the Forest Practices Board in their recent report on FSPs. Section 20 to 22 of the *Forest Planning and Practices Regulation (FPPR)* require notice, review, and comment to FSPs being proposed for approval.

To make these engagement efforts valuable, the public, stakeholders, and First Nations require suitable information to fully understand and respond to forestry activities occurring in areas in which they have an interest. To date, I do not consider FSPs to have been successful at providing this level of information, and I see two opportunities for improvement. The first of these is the need to utilize clear and understandable wording in the crafting of results or strategies. I will be looking at your FSP submissions through this lens and will speak to this further under *Results or Strategies* below. The second is the extent of mapping level information provided within your FSP or that your FSP commits to be shared. Section 5 of the *Forest and Range Practices Act (FRPA)* describes the content requirements for FSPs including a map using a scale and format suitable to the minister. Section 21(1)(c) of the FPPR speaks to the extent of the review and comment opportunity being commensurate with the nature and extent to which a person's rights may be affected.

I consider the timely provision of best available information on the location of future cutblocks and roads, and the likely schedule of operations for activities (including changes to access such as road reactivation/deactivation) within your forest development units as being essential for interested parties to make such an assessment. I am aware of several positive examples of Forest Licensees who are regularly sharing such information with stakeholders and interested public in advance of operations commencing on the ground. Relevant to your upcoming FSP submissions I ask that you consider how best to convey proposed cutblock, road, and access related information, either within your FSP or through a process described by your FSP that makes such information available in a fashion and time providing for affected or interested parties to understand your operations.

Results, Strategies and Measures

I rely upon forest professionals to provide supporting information to demonstrate that results, strategies and measures are consistent with all legal requirements. In addition to that supporting information for each result or strategy, I will consider:

- how each result in a FSP is comprised of *measurable* or *verifiable outcomes* in respect of a particular established objective;
- how each strategy in a FSP is comprised of *measurable* or *verifiable steps or practices that will be carried out* in respect to a particular established objective;
- the clarity of descriptions of the *situations and circumstances that determine where in a forest development unit (FDU) the result, strategy or measure will be applied, who will carry out actions, and when actions must be completed,*
- how each result or strategy (R/S) is consistent, to the prescribed extent, with established objectives.
- how the FSP is written to be clear and easily understood by those who may be affected by the operations undertaken through the plan

I expect that FSPs will be crafted in such a manner so as to achieve these criteria. This includes the commitment of how results, strategies and measures relate to on-the-ground outcomes rather than what may be planned (for example visual designs). I would recommend early communication between submitting and reviewing forest professionals on any questions related to the wording of results, strategies, or measures under development as a means to facilitate timely decision on your plans.

Cumulative Effects

Within DSS, an increasing number of rights-holding, non-forestry natural resource-dependent industries operate in the same landbase as forestry operations, but under different statutory regimes (e.g. conditions specified in Environmental Assessment Certificates). Multiple operations coupled with increasing frequency and intensity of natural disturbances (e.g. wildfires, forest health epidemics), has resulted in cumulative effect on land and water-based resource values, beyond optimal conditions for those values, in some areas of the District.

All rights-holders are entitled to exercise the rights they've been granted, and must be able to fulfil their legal obligations. I urge FSP preparers to:

- Dialogue with forestry and non-forestry rights-holders to gain awareness of constraints they are operating under; strive to ensure that your R/S will not put achievement of their constraints at risk.
- Review and where pertinent (i.e. in the absence of legal direction) strive for consistency with recommended indicators, and threshold or target recommendations, for values being studied in cumulative effects (CE) initiatives including the Northwest CE Pilot and the Provincial CE Framework and assessment procedures. Values being studied include forest biodiversity, old growth forest, aquatic ecosystems, grizzly bear and moose.
- Consider how unforeseen natural and man-made disturbances (such as forest health agents) may affect the achievement of legal targets where R/S are not set below maximum legal levels.
- Consider influences of both forestry and non-forestry developments (access and disturbance areas) in establishing thresholds or targets for R/S and specifying monitoring methodologies.

Legal FSP Content

I expect to see FSP results or strategies added, or revisited for consistency, with the following new or amended legal objectives:

Bulkley TSA

- Wildlife Habitat Area (WHA) Order #6-333, signed November 30, 2015 and effective February 5, 2016, which established a new Wildlife Habitat Area and General Wildlife Measures for the Northern Caribou – Telkwa Herd within Skeena-Stikine and Nadina Natural Resource Districts.

Kispiox TSA

- Effective March 3, 2016, the Land Use Objectives Regulation Order (under the *Land Act*, Land Use Objectives Regulation) for the Cranberry Sustainable Resource Management Plan (SRMP) area. The applicable period under *FRPA* section 8(2)(b) is one year.
- For the same area and effective the same date, the establishment of Old Growth Management Areas (under the *Oil and Gas Activities Act*, Environmental Protection and Management Regulation).
- Effective October 24, 2014, an Amendment (under the Government Actions Regulation) to Kispiox and Cranberry Mountain Goat Ungulate Winter Range U-6-006.

I will expect FSP preparers to exercise due diligence in crafting R/S or Best Management Practices for consistency with pertinent elements of Federal legislation (*Migratory Birds Convention Act* (1994) and Regulations, *Species At Risk Act*, *Fisheries Act*, and *Plant Protection Act*) and Provincial legislation (e.g. *Water Sustainability Act*).

Strategic Land Use Plans

I am aware of the precarious nature of “social licence” i.e. society’s trust that government and industry will uphold excellent stewardship principles in managing the values that society has identified as being most important on the landbase.

DSS’ legal objectives set by government have been brought forward from strategic land use plans. I consider these plans in their entirety to be an expression of the public interest that, through their approval by cabinet, constitute approved government policy. Objectives are underpinned by *strategies*, that are consistent with the objective and provide their management context, and both objectives and strategies have seen significant public and stakeholder contribution.

In the case of the Bulkley LRMP, reaching consensus was contingent on table members’ acceptance of results from a 1996 analysis showing LRMP implementation would result in a 10% impact on timber supply (the “10% LRMP balance”). The preamble to Bulkley HLPO (2006) which consolidates Bulkley’s objectives set by government (OSBG) states that the “10% LRMP balance” was carefully considered (i.e. re-balanced) in developing OSBG language.

An implementation principle stated in the preamble is that when a proponent (e.g. government) seeks to establish new objectives creating timber supply impact, they will identify offset areas where constraints are lightened to ensure the “10% LRMP balance” is maintained. Government has demonstrated their commitment to this principle. I have clarified through subsequent formal written communication that the principle applies not only in situations where constraints are being added, but also where constraints are being removed. This is implicit to the concept of maintaining a balance.

My view is that FSP holders have a responsibility to either demonstrate that their operations are consistent with strategic land use plans, or to rationalize deviations on the basis of improved stewardship. To that end I will typically expect FSP preparers to adopt strategic land use plan management strategies as FSP R/S, or as Best Management Practices (BMP) within the Supporting Document. Where the FSP preparer provides an alternative R/S or BMP, for example under the banner of innovative forest practices,

I will expect Supporting Documentation to include a sound rationale (e.g. references to best new science). For Bulkley TSA, I will also expect to see a reasonable estimate of timber supply impact, and a proposal for offsetting impacts.

Climate Change

A wealth of information has emerged relevant to climate change and its current or predicted impacts on many facets of forest operations, ranging from the expression of forest health agents to the validity of current stocking standards. I expect forest professionals to consider best available information relevant to predicted impacts of climate change, and apply their professional judgment to how climate change may result in unanticipated consequences to forest operations. From this, then to design results or strategies that compel site level prescriptions that build resiliency and mitigate both the expected and unexpected impacts of climate change.

I draw attention to the 2015 Skeena Region Climate Action Plan, which provides adaptation strategies that I expect to be considered during the preparation of FSP commitments. Of particular importance are strategies aimed at mitigating the risks associated with increased stream temperatures and peak flows, loss of biodiversity, increases in tree mortality, drought impacts on plantation establishment, and the spread of invasive plants.

Forest Health Strategy

DSS has invested significant effort in updating the District Forest Health Strategy. Key forest health agents on which to focus your consideration are *Dothistroma* needle blight and pine rusts in plantations, and spruce and mountain pine beetle in mature stands. The Chief Foresters Guidance to me particularly emphasized the importance of Forest Health agents relevant to climate change and future timber supply projections.

To best avoid downward pressures on timber supply and to build resiliency in our managed stands to forest health agents, I expect forest professionals to utilize and if possible assist in improving the annually revised DSS Forest Health Strategy. By doing so, I expect results, strategies, and measures aimed at mitigating the effects of forest health agents over your area of operations to be put into practice.

Stocking Standards

Per the Jim Sutherland (Director, Resources Practices Branch) June 2012 letter providing *Guidance for assessing FSP Stocking Standards alignment with addressing immediate and long-term Forest Health issues*, I expect forest professionals to revisit FSP stocking standards (species, density, and Free Growing height attributes) relative to known and foreseeable Forest Health Concerns linked to predicted Climate Change.

- I consider the *Reference Guide for FDP Stocking Standards – Updated February 2014 with Climate Based species selection recommendations*, and the annually revised Skeena Stikine District Forest Health Strategy (<https://www.for.gov.bc.ca/ftp/DSS/external/!publish/Web/Forest%20Health%20Strategy%202015/>) as suitable sources for this effort.
- I expect FSP preparers to duly consider applicability of Nadina Stocking Standards provided in the Nadina Forest Health Strategy, which I view as pertinent to areas at moderate to high risk for hard pine stem rusts. These standards now qualify as *enhanced stocking standards* for the purpose of anticipated timber pricing policy adjustments.

In the context of fire management planning, I acknowledge that innovative practices including the prescription of alternative stocking standards may be desirable. I will support stocking standards that enable such prescriptions with the understanding that fire management stocking standards are not

intended as silvicultural regimes over broad areas but are intended for small targeted areas to provide specific value protection or to implement landscape fuel breaks.

Consistent with the Tom Ethier (ADM Resource Stewardship Division) April 2013 memorandum regarding *Consideration of Climate Change When Addressing Long-Term Forest Health in Stocking Standards*:

- over the short term, subject to limitations of the Chief Forester's Standards for Seed Use I support the inclusion of increasing levels of Douglas Fir and Larch in certain stocking standards and overall planting programs,
- over the long term, I am generally supportive of species migration and species emphasis/de-emphasis recommendations from the Updated correlated tree species and stocking standards for BEC subzone/variant and site series combinations that are identified as having high climate change risk or opportunities project being led by Resource Practices Branch.

The Bulkley TSA Integrated Silviculture Strategy (Bulkley ISS) - a 3-year process initiating October 2016 - provides a venue for collaborative development of FSP stocking standards for Bulkley TSA and exploration of their timber supply impact. I perceive the potential for development of new or modified stocking standards for (e.g.) climate change adaptation, high-value wildlife habitat, wildland/ urban interface areas, and forest health agent pockets. I encourage FSP preparers in Bulkley TSA to engage in this venue.

New Monitoring Information

I expect forest professionals to consider status trends and recommended areas of improvement identified in FRPA Resource Evaluation Program (FREP) publications in developing refinements to FSP R/S and BMP's. For DSS these include Multiple Resource Value Assessment (MRVA1) reports available for Kispiox and Bulkley TSA's, and draft MRVA2 reports for Lake Babine Nation and Wet'suwet'en traditional territories.

I expect particular focus on trends and recommendations for the following values.

Water, Fish, Wildlife and Biodiversity within Riparian Areas

Recent research (Rex et al, 2011) has shown that small interior streams harvested with low to no mature tree retention within 10 metres to either side are experiencing negative impacts to stream function, including increased temperatures, lack of large woody debris dynamics, increased sedimentation, increased blockages, and decreases in moss, invertebrates, shade and vegetation.

Consequently, I expect new FSPs to better reflect retention levels characteristic of what the healthy unmanaged plant community would normally be within the first 10 metres for small streams (S4 and S6). I note that some licensees have already made updates to their riparian management practices. For new FSPs I am especially interested in understanding your management approach in watersheds that are established as or have been considered for Fisheries Sensitive Watershed designations, for S6 streams, streams that have transport potential, streams that are directly tributary to fish bearing waters, streams in watersheds with known erosion problems, and streams in watersheds with a strong harvest history and where riparian impacts are reasonably known.

Stand-level Biodiversity

Bulkley and Kispiox FREP monitoring results show that the density of large snags and large diameter trees retained is lower than what is naturally expected. The results also show that the amount and quality of large coarse woody debris (CWD) – both in terms of volume and density – is lower than what is naturally expected.

I am aware that West Fraser (Pacific Inland Resources), Resource Practices Branch and DSS Stewardship staff are collaborating on developing *Best Management Practices (BMP's) for Stand Level Biodiversity in Bulkley TSA* using MRVA indicators and thresholds. I encourage finalization and sharing of these BMP's across the broader stewardship community of practice, to advise revisit to FSP R/S and BMP captured to Supporting Documentation.

Despite this guidance, I am aware that both 2015 and 2016 saw an upswing in mature stand mortality in Bulkley and to a lesser degree Kispiox TSA, resulting from spruce and pine bark beetle attack. Material originating from infested trees (cull logs, long butts, etc.) is known to be a source of bark beetles, and downed spruce logs will draw spruce beetle. Within contiguous high to extreme beetle hazard areas where forest health monitoring surveys have picked up beetle presence, blanket variance can be sought from CWD targets and actions.

Northern Goshawk

Northern Goshawk is presently yellow-listed in Skeena Region (i.e. not considered at risk of extinction, but warranting special attention by wildlife and resource managers). Due to population declines there is likelihood that the species will in near future be listed as an endangered species under the *Wildlife Act*. In DSS, management for goshawk is largely in the non-legal realm, outside of the Cranberry SRMP area where objectives have been set by government.

I urge FSP preparers to gain familiarity with findings of the 2015 study *Occupancy and Status of Northern Goshawk Breeding Areas in the Coast Mountains (Kalum), Nadina and Skeena Stikine Resource Districts*, and Best Management Practice (BMP) recommendations provided in *A Scientific Basis for Managing Northern Goshawk Breeding Areas in the Interior of British Columbia (2012)*, and consider adopting recommended BMP's.

Consistent with the Chief Forester's bulletin regarding *Stewardship and Stabilizing the Timber Harvesting Land Base*, within the bounds of legislation and amendment policy (e.g. Skeena Region OGMA Amendment Policy) I will be generally supportive of innovative R/S or BMP's that are designed to enhance Goshawk habitat through (e.g.):

- adjusting boundaries of spatial objectives (e.g. OGMA's);
- spatially identifying large, common Wildlife Tree Retention Areas at a landscape unit/ biogeoclimatic subzone level to achieve a proportion of stand-level biodiversity targets,

to facilitate better co-location of constrained landbase with goshawk nesting sites and fledgling areas.

Landscape-level Biodiversity

For some ecosystems in a number of landscape units, the seral stage distribution is approaching the established target. In some instances, there is a deficit in the minimum amount of mature and old or old forest required, or a surplus in the amount of young forest allowed. Maintaining the diversity of seral stages and disturbance regimes historically found within various ecosystems is intrinsically linked with the maintenance of biodiversity. Therefore, I expect your FSP to commit to practices designed to achieve the seral stage targets that apply to the forest development unit and to ensure that these targets are not compromised.

Several changes were made recently to old growth management areas (OGMAs) in Kispiox TSA. I expect your new FSP to identify the amended and newly established OGMAs. Please note this will require changes to most FSPs as well as FSP maps.

Invasive Plants and Natural Range Barriers

FPPR section 17 requires that FSPs specify measures to prevent the introduction or spread of invasive plants due to forest practices enabled under the plan, and FPPR section 18 requires measures to mitigate the effect of removing or rendering ineffective natural range barriers. The August 2015 Forest Practices Board Report *Forest Stewardship Plans: Are they Meeting Expectations (the FPB Report)* found that the measures FSP holders have provided for natural range barriers and invasive plants typically do not specify actions that are clearly focused on achievement of intended results, and are measurable and/or verifiable.

I will expect a revisit to measures for invasive plants and natural range barriers.

- I consider “*Best Practices for preventing the spread of invasive plants during forest management activities; A pocket guide for British Columbia’s Forest Workers 2013 Edition*” as a suitable source for effective practices.
- *FRPA General Bulletin #21 - Natural Range Barriers* is under revision. I consider FLNRO Range Branch advice on *Measures for Natural Range Barriers*, provided by May 25, 2016 email, as a suitable interim source for practices.

Closing

In closing, I look forward to the continued success of the relationships you have established with district staff, the public, First Nations, and stakeholders. I encourage you to embrace continued improvements in creating measurable and verifiable results and strategies within your FSPs that are consistent with objectives. I encourage you to review the Forest Practices Board report “*Forest Stewardship Plans: are they meeting expectations?*” and the Chief Forester’s letter to seek out opportunities for further improvements to FSPs.

Within my adjudication of plans, I am receptive to considering new and innovative results and strategies that achieve objectives in different ways as long as they are grounded in science and a sound rationale is provided. I again encourage you to make early contact with reviewing staff to discuss any specific questions or thoughts that you might have on the preparation of FSP content. The DSS review team is led by Glen Buhr, DSS Stewardship Officer, who can be reached in the district office at 250 847-6308. I look forward to your upcoming FSP submissions and to the continuous improvement of resource management.

Yours truly,

Jevan Hanchard, RPF
District Manager

SOURCES OF INFORMATION

Available on <https://www.for.gov.bc.ca/ftp/DSS/external!/publish/FSP>

1. March 8, 2016 Steve Thomson, Minister, letter: *The renewal of forest stewardship plans*

2. March 2015 Dianne Nicholls, Chief Forester: *Guidance on the replacement of forest stewardship plans*
3. August 2015 Forest Practices Board Report: *Forest Stewardship Plans: Are they Meeting Expectations*
4. *Forest and Range Practices Act Invasive Plant Measures: Considerations for Plan Preparers and Approvers* (2016)
5. Best Practices for Preventing the Spread of Invasive Plants During Forest Management Activities (2013)
6. Adapting Forest and Range Management to Climate Change in the Skeena Region: Considerations for Practitioners and Government Staff
7. August 2010 *Old Growth Management Area (OGMA) Amendment Policy – Skeena Region*
8. FREP MRVA1 Reports for Bulkley and Kispiox TSA's
9. March 2015 Chief Forester Information Bulletin: *Stewardship and Stabilizing the Timber Harvesting Land Base*
10. (Draft) Best Management Practices (BMP's) for Stand Level Biodiversity in Bulkley TSA
11. Rex, J., D. Maloney, E. MacIsaac, H. Herunter, P. Beaudry, and L. Beaudry. 2011. Small stream riparian retention: the Prince George Small Streams Project. BC Extension Note 100.
12. May 25, 2016 Perry Grilz, FLNRO Range Branch email: *Considerations for FSP content related to Natural Range Barriers*

Available on <https://www.for.gov.bc.ca/ftp/DSS/external!/publish/Web/Forest Health Strategy 2015>

- Skeena Stikine District Forest Health Strategy

Available through <https://www.for.gov.bc.ca/dss/LRMP.htm>

- Weblinks to strategic land use plans, and objectives set by government, for all Skeena Stikine District planning areas

Available on <https://www.for.gov.bc.ca/ftp/DND/external!/publish/FSP>

- Occupancy and Status of Northern Goshawk Breeding Areas in the Coast Mountains (Kalum), Nadina and Skeena Stikine Resource Districts (2015)
- A Scientific Basis for Managing Northern Goshawk Breeding Areas in the Interior of British Columbia (2012)

Available through <http://a100.gov.bc.ca/pub/siwe/details.do?projectId=5299&pagerOffset=0>

- 2016-ongoing - Goshawk - Nest Location Visual Observations - Skeena Region. Last updated Oct 26, 2016
- Doyle, F.I., A. Coosemans, and L. Rach. 2017. Northern Goshawk (*Accipiter gentilis* ssp. *atricapillus*) Management Strategy for the Skeena Region; March 2017. British Columbia Ministry Forests, Lands, and Natural Resource Operations. Smithers, BC. Pp 1-36.