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August 18, 2016

To: All forest licensees and forest professionals

By email

Re: Nadina 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.

FSP Replacement at Term Expiry

In the decade since FSPs were first approved within the Nadina Natural Resource District (Nadina), forest management circumstances have substantially changed as a result of the mountain pine beetle epidemic, accelerated salvage harvesting, heightened pressure for fibre utilization, land-use orders, and progress towards First Nation reconciliation with the Crown. New information related to factors affecting or affected by forestry operations has also become available during this time period. Consequently, I consider it to be an appropriate time for the development of replacement FSPs to ensure that FSP content considers the current conditions of the landscape and new information.

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. Additionally, I expect that forest professionals 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 reconciling these 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 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, 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 very 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.

Land and Resource Management Plans

Both the Morice and Lakes TSAs have completed Land and Resource Management Plans (LRMPs). While some elements of these plans have subsequently been established through legal objectives and designations, 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. I expect that forest professionals consider the objectives and strategies identified within these documents and craft results or strategies that are consistent with them. If forest professionals are proposing results or strategies that can not be readily assessed as achieving the non-legal objectives identified under these plans, I will expect the FSP to describe why the objective can not be achieved as it has been expressed and to include a rationale as to how the result or strategy will deliver an appropriate outcome relevant to the intent of the established LRMP objective.

Climate Change

A wealth of information has become available relevant to climate change and its current or predicted impacts on many facets of forest operations ranging from the expression of forest health agents through to the validity of current stocking standards. I expect that forest professionals will consider the best available information relevant to the predicted impacts of climate change, and apply their professional judgment to how climate change may result in unanticipated consequences relevant 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.

The Mountain Pine Beetle epidemic which has so profoundly impacted the Nadina is an ongoing example of how climate change can affect the individual components of ecosystems with far reaching consequences. The Skeena climate change adaptation strategies that have been developed will assist with the preparation of FSP commitments. Of particular importance are those 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

Consistent with the above, the district has invested significant effort in the development of an updated Forest Health Strategy. Key forest health agents to focus for your consideration on are the increased expression of pine rusts in plantations, the changes observed in the habits of spruce beetle in mature stands, and the prevalence of Dothistroma needle blight in areas where it would not previously have been anticipated. 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 developing the annually revised Nadina 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.

Wildlife

A significant amount of new information has become available with respect to the effects of forestry operations on wildlife, particularly related to the accelerated harvest levels associated with MPB salvage. The report prepared by MLA Morris 'Getting the Balance Right' identifies specific actions that forest professionals should be considering with regard to the forestry operations prescribed through FSPs. The Province has also made progress on the identification of objectives to manage the wildlife species in the Nadina. I expect that the newly established UWRs and WHAs for goat and caribou in the Morice TSA will be identified and addressed through FSPs. I further expect that the notices, draft ungulate winter ranges (UWR) and general wildlife measures (GWM) are considered in the preparation of results or strategies for the Tweedsmuir and Takla caribou herds

Water, Fish, Wildlife and Biodiversity within Riparian Areas

Research information continues to show that small interior streams are experiencing negative impacts due to forest harvesting activities (increased temperatures, large woody debris dynamics). The Forest and Range Evaluation Program (FREP) assessments conducted over the past 10 years also show a high correlation between the functional condition of small streams (S4 and S6 class streams) and the retention of forest stands within the first 10 metres from the stream edge. These assessments for the Nadina indicate that logging and road developments account for at least 40% of the impacts affecting stream functions (increased sedimentation, increased blockages, decrease in moss, invertebrates, shade and vegetation). This data further indicates that small streams are disproportionately affected by forest operations. FRPA was constructed to have FREP monitoring provide a feedback loop to forest practitioners on the effectiveness of forest practices and how they are achieving the established objectives with the aim of continuous improvement. FREP results are quantitative data that I trust and will rely upon to inform forest management decisions.

I consider these operational results to signal a demonstrated performance issue with small stream management and that the observed proportion of small streams classified as at risk or as not properly functioning to be inconsistent with the objective for water, fish, wildlife, and biodiversity within riparian areas established under section 8 of the FPPR. Accordingly, I will expect further update and improvement to the riparian strategies in your FSPs including a description of the range of considerations that will be made when determining the most appropriate management prescription for a stream. I note that some licensees have already made updates to their riparian management practices for which we will be targeting additional FREP sampling to better assess the success of these in meeting the objective. For new FSPs I am especially interested in understanding your management approach in watersheds that 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.

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 (e.g. Valley – SBS dk) or a surplus in the amount of young forest allowed (e.g. Chelaslie Caribou Migration Corridor – Moderate). 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.

For the Lakes TSA, I am aware that current FSP commitments are no longer consistent with the objective set by government (OSBG) for habitat connectivity within the Lakes North Connectivity Matrix (LCM). Consequently, I expect the result/strategy pertaining to habitat connectivity within the LCM to be revised to ensure consistency with the OSBG.

Several changes were made recently to old growth management areas (OGMAs) in the Lakes 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.

In the Morice TSA, the establishment of new land use objectives under the Morice Biodiversity Order is imminent. A FSP amendment that takes this into account must be proposed and submitted for approval within one year of the effective date of the order. To lessen the administrative burden associated with such an amendment, I suggest results or strategies in relation to the new land use objectives be incorporated in your new FSP.

Stand-level Biodiversity

FREP results show that the density of large snags and large diameter trees being retained and the volume and density of large coarse woody debris (CWD) is lower than what is naturally expected. The stand-level objectives established in the Nadina (SRMPs and FPPR) require the retention of wildlife trees with attention being paid to the size, structure, amount, and location to provide ecological attributes contributing to stand level biodiversity. I again perceive a gap between the objective set by government and the effectiveness of the on-the-ground practices in delivering upon it. I therefore expect your FSP to reflect a commitment to improve retention quality by retaining higher densities of large trees – both alive and dead – and by retaining more large CWD within the net area to be reforested.

Stocking Standards

I expect that forest professionals will continue to design their stocking standards consistent with the Nadina stocking standards. These have been included within the Nadina Forest Health Strategy, and contain recommendations for regeneration standards.

Please note that while most areas of the province have yet to develop enhanced stocking standards, the Nadina Stocking Standards are considered as enhanced stocking standards for the purpose of anticipated timber pricing policy adjustments. By utilizing the Nadina Standards within an approved FSP you will be eligible to take advantage of incremental appraisal allowances for enhanced stocking. To do so however, the FSP must specifically include the regeneration standard with planting densities.

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.

Invasive Plants

The objective established under section 17 of the FPPR is that FSPs specify measures to prevent the introduction or spread of invasive plants due to forest practices enabled under the plan. To assist in accomplishing this, I urge forest professionals to increase their awareness and those of operators and staff of invasive plants and the preventative practices, monitoring, and treatment options that are key to preventing the spread and introduction of invasive plants.

I would like to acknowledge recent efforts from some licensees within the Nadina seeking to develop innovative practices aimed at better addressing the spread of invasive plants. I see a on-going role for district staff to work with forest professionals on assembling new information that could support such practices.

In the interim, I recognize the prompt seeding of bare ground as the most efficient and practical means of addressing the objective. When bare ground is re-vegetated it is essential that the seed used does not contain invasive plants. Accordingly I expect you to update and improve current prescribed measures to ensure that seed mixtures containing invasive plants seeds will not be sowed.

Natural Range Barriers

Measures to mitigate the effect of removing or rendering natural range barriers (NRBs) ineffective must be specified. It is the FSP holder's responsibility to work with range tenure holders to identify where their operations may result in impacts to NRBs and the application of measures specified cannot be limited to NRBs that were made known prior to harvest.

Best Management Practices

I expect that the following work will be considered as best practices in forest operations and will be incorporated in the preparation and implementation of the FSP:

- Recommendations resulting from watershed assessments for the watersheds currently under consideration as draft Fisheries Sensitive Watersheds (FSWs). These include Foxy Creek, Gullwing Creek, Henkel Creek, Pierre Creek, Tildelsey Creek, McQuarrie Creek, Lamprey Creek, Owen Creek, Objective Creek, Nadina River and Tachek Creek. I expect that forest professionals will incorporate the criteria established through these assessments to mitigate watershed level hazards into FSP results or strategies, and I will be directing staff to initiate work aimed at formalizing the establishment of FSWs and associated objectives within the Nadina.
- *A Scientific Basis for Managing Northern Goshawk Breeding Areas in the Interior of British Columbia: Best Management Practices (2012)*. I expect that goshawk breeding areas are identified and that all steps to avoid, minimize and otherwise mitigate adverse impacts are taken (also see *Occupancy and Status of Northern Goshawk Breeding Areas*

in the Coast Mountains (Kalum) Nadina and Skeena Stikine Resource Districts (2015) and the May 29, 2016 expectation letter from the Skeena regional executive director);

- *Best Practices for Preventing the Spread of Invasive Plants during Forest Management Activities (2013)*;
- *Interim Guidelines for Forest Development and Associated Activities in Tweedsmuir-Entiako Caribou Winter Range*.

Results or Strategies

I rely upon forest professionals to provide supporting information to demonstrate that results or strategies 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 or strategy will be applied*; and
- how each result or strategy 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 or strategies 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.

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 within Nadina. 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 Nadina review team is led by Agathe Bernard, who can be reached in the district office at 250 692-2259. 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 (documents available on
<https://www.for.gov.bc.ca/ftp/DND/external/!publish/FSP>):*

- Steve Thomson Minister Letter “Re: The renewal of forest stewardship plans” (March 8, 2016)
- Dianne Nicholls, Chief Forester “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
- MRVA Reports (Lakes and Morice TSA)
- FREP Reports (5 reports)
- Watershed review reports for Foxy, Tildelsey, Pierre, Henkel, Gullwing, Tachek, McQuarrie, Lamprey, Owen, Objective, and Nadina creeks
- 2016 Nadina Forest Health Strategy
- 2016 Goshawk Expectation letter
- 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)
- Best Practices for Preventing the Spread of Invasive Plants During Forest Management Activities (2013)
- Invasive Plant Measure Guidance (2016)
- Lakes District Land and Resource Management Plan and Orders
- Morice Land and Resource Management Plan
- Draft Biodiversity Order for the Morice TSA
- Lakes North Sustainable Resource Management Plan and Orders
- Lakes South Sustainable Resource Management Plan and Orders
- Wildlife Notices
- Ungulate Winter Ranges for Mountain Goat and Caribou
- Wildlife Habitat Areas for Bull Trout and Caribou
- Draft Ungulate Winter Range Order for Caribou (Tweedsmuir and Takla)
- Adapting Forest and Range Management to Climate Change in the Skeena Region: Considerations for Practitioners and Government Staff
- Interim Guidelines for Forest Development and Associated Activities in Tweedsmuir-Entiako Caribou Winter Range
- Small Stream Riparian Retention: the Prince George Small Streams Project
- Fire Management Stocking Standards Guidance