



File: FOR 18045-30/FSP Letters to Licensees

July 7, 2016

Dunkley Lumber Ltd
PO Box 173
Prince George, British Columbia
V2L 4S1

Dear Licensee:

Re: District Manager Expectations on the Development of Forest Stewardship Plans in the Omineca Region

As a Delegated Decision Maker (DDM) responsible for approving Forest Stewardship Plans (FSPs), I am presenting information that I consider to be of weight and relevance to the preparation and adjudication of FSPs.

In addition to the Forest Practices Board (FPB) Report (Special Investigation, August, 2015) and the Chief Forester's recent guidance regarding FSPs (Memorandum, March 8, 2016), this letter provides further direction and clarification for those licensees and FSP agreement holders operating in the Stuart Nechako Natural Resource District.

The points in this letter outline my expectations for continuous improvements to FSPs. I encourage dialogue with decision makers and qualified registered professionals to ensure core forest resource stewardship factors and values are fully considered when preparing and submitting FSPs for approval. Taken individually or in combination, these points are significant and worthy of consideration in the development of replacement FSPs.

The expectations of the Province, First Nations, local government and other tenure holders have evolved and changed since the approval of the original FSPs. Since the initial FSPs, there have been many circumstances impacting the forest resource that require us to adapt the ways in which we manage our forests. Simply meeting the legal requirements may no longer be adequate when operating in a professional reliance regime. It is expected that preparers collaborate with qualified professionals and subject matter experts to develop management practices that adequately support results, strategies (R/S), measures and stocking standards in a FSP. As such, the content of a FSP will reflect outcomes, recommendations and emerging trends witnessed and documented in monitoring programs and studies.

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Emphasis on Measurable and Verifiable Results, Strategies and Measures

In some cases, the FPB found FSPs containing R/S that did not demonstrate consistency with government objectives and had concerns with measurability or verifiability. In addition, few of the measures to prevent the introduction or spread of invasive plants or to mitigate the removal of natural range barriers were practical or likely to be effective. I expect R/S and measures to be consistent with the government objectives, measurable and verifiable. Measures are also expected to be reasonable.

I expect FSP submissions to demonstrate clearly that Results and Strategies comply with all legal requirements and describe how R/S for each objective set by government comply with the definition of these terms, as set out in the Forest Planning and Practices Regulation (FPPR) and how proposed measures will be reasonable, effective and enforceable.

Practice requirements listed in the FPPR must be followed as written in legislation. If R/S that vary from practice requirements are proposed, this must be done through existing legal mechanisms and supported by a professional rationale.

Forest Development Units (FDUs)

The overlap of FDUs should be minimized and/or a single multi-signatory FSP should be considered that covers the management unit to which it applies. Multi-signatory FSPs will help reduce management complexity, streamline approval and amendment procedures and help facilitate First Nations Consultation, public and stakeholder understanding and involvement.

In situations where FSPs share landscape units and overlap, there must be verifiable and measurable Results and Strategies which meet the legal objectives both on their own and in collaboration with the overlapping FSPs.

First Nations Collaboration, Stakeholder and Public Consultation

My expectation is to engage early with First Nations and other tenure holders to effectively share information about forestry operational plans and to garner specific input to support the preparation of the FSP.

I expect FSP holders to indicate in the FSP how they will identify and make information more useful and available. It is expected that FSP holders will work with affected parties throughout the duration of the FSP term in order to receive meaningful comments. Within the supporting document that accompanies the FSP, FSP holders could identify proposed harvest and road management activities for up to 5 years to clearly illustrate to First Nations, other tenure holders and the public how the FSP relates to their area(s) of interest.

Forest Health

I expect FSP preparers to consider the effects of current and emerging forest health issues on forest ecosystems in the development of FSP content, including the 2016 Omineca Region Forest Health Strategy, while remaining informed about the Spruce Beetle infestation within the Omineca region.

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Visuals

I expect that forest professionals will not prepare results or strategies that exempt themselves from having to meet a Visual Quality Objective (VQO). Results or strategies should not be used to create exemptions or circumvent the exemption process established in the legislation. Sections 12(7) or 25.1 of the FPPR provide for an exemption if warranted.

Collaborative Planning and Cumulative Effects

I expect that forest professionals consider the potential resultant effects of multiple licensees on the landscape when developing their plans.

I expect that forest professionals recognize the importance of managing cumulative effects which consider the combined impacts of forestry activities on First Nations rights and interests, other land users and land uses including Section 7 Notices and GAR Orders. Coordinated planning amongst forest professionals between all sectors is required to achieve positive outcomes for these values.

Results of Natural Resource Monitoring

I expect that forest professionals continue to improve their management of the FRPA values by considering the trends and identified areas of improvement from the Forest and Range Evaluation Program (FREP) and Multiple Resource Value Assessments (MRVA).

New Information and Best Management Practices

I expect forest professionals to indicate how they have addressed and considered new information in preparation of their FSP content including but not limited to:

- District Manager Direction
- Small Streams Report – Extension Note 100 - John Rex
- First Nations Aboriginal Rights and Interests
- Recognition of Current Government Agreements with First Nations
- Climate Change
- Establishment of New GAR Orders

Invasive Plants

I expect forest professionals to increase their awareness of and have Measures that specify actions that are reasonable, appropriate and enforceable to prevent the introduction and spread of invasive plants. Identification, training, preventative practices, monitoring and possible treatment are elements to consider when proposing measures. These measures need to be reasonable, measurable and enforceable.

Potential Information Sources:

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- Invasive Plants Prevention Guidelines for FRPA Operational Plans
- Habitat Susceptibility to Invasive Plants by BEC Zone
- Best Practices for Preventing the Spread of Invasive Plants During Forest Management Activities – 2013 edition

Natural Range Barriers

I expect forest professionals to address the desirable elements of Measures for natural range barriers to include communication, identification of range barriers, mitigation actions and follow-up. Measures to mitigate the removal or render ineffective a natural range barrier must specify actions that are reasonable, appropriate and enforceable.

Conclusion

These expectations are the first step in building the critical lines of communication to inform preparation and adjudication of new and replacement FSPs and to continuously improve forest resource stewardship in the Omineca Region and the Stuart Nechako Natural Resource District. All forest licensees, BC Timber Sales and our community of qualified professionals are expected to engage in and contribute to the subsequent conversations this document promotes.

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 for the overall improvement of FSPs, as well as the social licence provided by the citizens of BC. Wider engagement with a cross section of ministry professionals will be sure to support this goal. The importance of collaborative planning across watersheds or within the TSA to address landscape level values, objectives and cumulative effects, incorporation of non-legal information and First Nations Agreements will be an area of focus through the adjudication and approval process of FSPs.

As the Chief Forester mentioned in her guidance document, the landscape has changed and we have gained experience, knowledge and feedback in the decade following the approval and implementation of the first FSPs.

Information Sources

Since the inception of FSPs, there have been numerous documents that have been developed and/or updated that should be considered when revisiting your FSP. While this is not a complete list, supporting literature includes:

- [Administrative Guide to Forest Stewardship Plans](#)
- [Guidance to C&E Program Staff on the Assessment of Measurable or Verifiable Results or Strategies within a Forest Stewardship Plan \(FSP\)](#)
- [Forest Practices Board Reports](#) such as, but not limited to;
 - [FSP's: Are They Achieving Expectations](#)

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- [Mitigation of Forestry Impacts to Natural Range Barriers](#)
- [Community Watersheds: From Objectives to Results on the Ground](#)
- [FRPA bulletins](#)
- [Stocking Standards](#), including;
 - [Fire Management Stocking Standards Guidance](#),
 - [Guidance for assessing FSP stocking standards alignment with addressing immediate and long-term forest health issues](#)
 - [Climate-Change Related Stocking Standards](#)

Yours truly,

A handwritten signature in black ink, appearing to read "David Van Dolah". The signature is written in a cursive, flowing style.

David Van Dolah RFT
District Manager
Stuart Nechako Natural Resource District