



July 25, 2016

File: ORCS 18045-02

To: Licensees and BC Timber Sales with Forest Stewardship Plans (FSPs) in the Sunshine Coast Natural Resource District:

As a follow-up to the FSP training in April, the Minister's letter, the Chief Forester's provincial guidance letter, and the Forest Practices Board's report, please find my expectations regarding FSP replacements in the Sunshine Coast Natural Resource District.

The District Manager's FSP expectations are not legally binding and constitute policy guidance under the *Forest and Range Practices Act* (FRPA) non-legal realm. As such, the information contained in this letter is intended to provide practitioners further clarity around the principles and process that will be used to decide whether a proposed FSP meets the legal tests in FRPA and the *Forest Planning and Practices Regulation* (FPPR), (e.g. consistent with government objectives).

Over the past decade, there have been substantive changes to the land base, operating environment, best available information, stakeholder interests and public expectations regarding forest stewardship and planning. It is highly likely that these changes warrant FSP replacements rather than extensions.

By submitting a replacement FSP, the legal requirement for public consultation is triggered which enables communities, stakeholders, the general public and other affected parties to have a formal opportunity to review and present their perspectives and input on the plan. In special circumstances, however, it may be necessary to request a short term extension without public review if supported by a rationale.

The Association of British Columbia Forest Professionals (ABCFFP) guidance recommends that professionally-prepared documentation in support of proposed FSPs include rationales stating how relevant information (e.g. district manager expectations, best available information, and non-legal guidance) has been considered in the preparation of FSPs. In reviewing proposed FSPs, there may be a need to request information from a licensee, such as approaches, strategies, metrics, or rationales to support my review of the FSP content against legal approval tests.

Within the context of the above comments, my expectations are categorized into three subheadings; Opportunities for Improvement, New Information Considerations, and Next Steps in the process leading up to FSP submissions, as follows:

### **Opportunities for Improvement:**

Generally, licensees operating in the Sunshine Coast Natural Resource District have been diligent and proactive in engaging and addressing public, stakeholder and First Nation concerns and interests. However there may be opportunities for improvement by building on these efforts and learning from the past, given the changing environment across the land base.

Some of the changing interests include, but are not limited to, people's desire for greater input on proposed forest development, increased environmental concerns, cumulative effects of increasing natural resource activity, water quality, or increasing requirements for species at risk.

Given the above, licensees need to factor in the following:

- Results, strategies, and measures, and general refinements – ensure the FSP commitments are consistent with Government objectives, results and strategies are measurable and verifiable, and commitments are clearly written and supported.
- Stocking standards – climate change, drought conditions, forest health issues, fire management concerns, and significant wildlife impacts may trigger the need to change stocking standards.
- Collaborative planning – forest licence holders should explore a more collaborated and coordinated forest stewardship planning approach to address cumulative hydrological effects, manage strategic cultural values (e.g. cultural landscape feature, sanctuary, etc.), invasive plant management, wildlife habitat management, enhance stocking standards, and address other relevant aspects of the FSP.
- Social licence – there are options to improve engagement with interested or affected parties during the review and lifetime of FSPs to minimize and address potential specific and landscape level concerns. There are new options with technology to share and capture development planning to help the public and or stakeholders understand proposed activities and get timely feedback, before, during and after forest development. Development planning should consider how harvesting is integrated into recreation values and various other stakeholder's rights on the land base. Early engagement is one tool to support this.
- Public safety – public use is increasing in the district. Licensees should consider the impact of their operations on access and public safety both during and after harvest activities as well as any longer term resource management risks (e.g. terrain stability).

## Information Considerations:

There is a significant amount of new information available that should be considered in preparing FSPs. Although not an exhaustive list, key information and guidance at a provincial, regional, and local level is cited below for your consideration in preparing FSPs.

#	Direction, guidance, information	Examples
1	Government objectives	<ul style="list-style-type: none"> <li>• Land <i>Act</i> and FRPA orders and notices</li> </ul>
2	Chief Forester standards	<ul style="list-style-type: none"> <li>• Chief Forester standards for seed use</li> <li>• Climate-based seed transfer interim policy measures</li> </ul>
3	Provincial guidance -	<ul style="list-style-type: none"> <li>• Landscape fire management planning</li> <li>• Climate change stocking standards</li> <li>• Fire management stocking standards</li> <li>• Forest health and species selection</li> <li>• Provincial Timber Mgmt Goals and Objectives</li> <li>• Overview Reference for the Evaluation of Stocking Standards under FRPA</li> <li>• Visual Resource Management</li> </ul>
4	Regional and local guidance	<ul style="list-style-type: none"> <li>• Integrated silviculture strategies</li> <li>• Timber supply analyses and AAC determinations</li> <li>• TSA forest health strategies</li> <li>• Regional climate action plans</li> <li>• Invasive Plant Information for FSP Preparers &amp; Reviewers within the Coast Forest Region</li> <li>• Appendix A - FRPA Regulation Species Recommended for FSP Inclusion by Former Coastal Forest District &amp; BEC Zone</li> <li>• Sunshine Coast Resource District website FSP link</li> </ul>
5	Monitoring trends and guidance	<ul style="list-style-type: none"> <li>• Forest and Range Evaluation Program (FREP)</li> <li>• Multi resource value assessments (MRVAs)</li> </ul>
6	Best available information	<ul style="list-style-type: none"> <li>• Regional extension notes: adapting to climate change</li> <li>• Research (e.g. hydrology, wildlife, riparian, timber, forest health, natural disturbance, invasive species)</li> <li>• Critical Habitat for Species at Risk (see federal Recovery Planning documents)</li> <li>• Provincial<sup>1</sup> or Federal<sup>2</sup> Recovery Planning documents</li> <li>• Drought risk assessment tool</li> <li>• Cumulative Effects Framework</li> <li>• Water Sustainability Act</li> </ul>

<sup>1</sup> <http://www.env.gov.bc.ca/wld/recoveryplans/rcvry1.htm>

<sup>2</sup> <http://www.sararegistry.gc.ca/default.asp?lang=En&n=24F7211B-1>

In relation to the above items, take into consideration the following:

**Item 4 – Regional and local guidance.**

- Forest health – annual reports continue to show impacts from several pests or forest health issues. These factors and others should be given consideration for FSP preparation.
- First Nations – consideration for strategic First Nation cultural information is important as early as possible in the planning process.

**Item 5 – Monitoring trends and guidance**

- FREP/MRVA – consider the importance of retention around small streams which may be critical for water quality aspects from logging practices of the past few years. Specifically, minimize soil disturbance near streams, retain understory vegetation and non-merchantable trees for cut bank stability wherever operationally feasible, and avoid leaving introduced woody debris on small streams that could create stream blockages post harvesting.
- FREP data may include data specific to your operations that you may want to consider as you revisit your results and strategies particularly around stand level biodiversity, riparian values and water quality. Data specific to your operations can be made available upon request.

**Item 6 – Best available information**

- Other species and recovery plans - available on the Federal Species at Risk Public Registry and Provincial web sites as noted above (e.g. Marbled Murrelet, Northern Goshawk laingi subspecies). It is important for professionals to consider all aspects of the FSP and associated forest development planning that may influence habitat for other species not listed in FPPR Section 7 or WLPPR Section 9 Wildlife Notices.
- Forest Planning and Practices Regulations (FPPR) Sections 21 and 22 - public comments must be considered, and the actions taken to address them must be included as part of the FSP submission to the District Manager.
- Stakeholders/persons with rights who may be affected by the proposed FSP – these groups must have an opportunity to review and comment on the plan. Stakeholders that are important but not necessarily the main focus may include other forest licensees, land and water rights holders, guide outfitters, commercial recreation groups, trappers, adjacent private land holders, and community/rate payer groups. Where a specific forest stewardship related concern does not fit within a result or strategy framework, the response to the above referenced stakeholder's concern or interest will be important in assessing the effectiveness and completeness of stakeholder engagement.

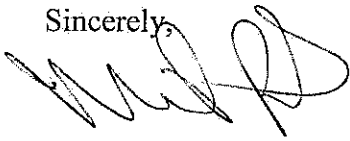
This information may not form part of the legal commitments of the FSP, but may accompany the FSP submission as supporting information or be available upon request at the FSP review process.

**Next steps:**

Along with this expectation letter, the planning process can include an opportunity to have information sharing meetings with licensees to further discuss the District Manager's expectations. Additional topics can include the licensee's perspective on these expectations, licensee's plans and timelines, and the district's process for reviewing FSPs.

I trust that a high degree of effort and communication will continue to occur when FSP replacements are developed. If you have any questions on the above, please contact the Forester reviewing your FSP as listed in the attached table.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Peters', written over a horizontal line.

Mike Peters,  
District Manager  
Sunshine Coast Natural Resource District



### Sunshine Coast FSPs

Licensee	FSP ID	Expiry Date	Reviewer
Homalco Forestry Limited Partnership	143		Rainer Gruenhagen
Interfor Corporation/ Homalco Forestry Limited Partnership	20	July 2016	Chuck Anderson
A & A Trading Ltd./ Klahoose Forestry Limited Partnership	55	Nov 2016	Chuck Anderson
Northwest Hardwoods Canada Inc.	61	Dec 2016	Rainer Gruenhagen
Sechelt Community Projects Inc. (CFA)	94	Dec 2016	Chuck Anderson
Western Forest Products Inc.	69	Jan 2017	Rainer Gruenhagen
British Columbia Timber Sales	190	Feb 2017	Rainer Gruenhagen
Klahoose Forestry Limited Partnership (CFA)	232	Feb 2018	Chuck Anderson
Tsain-Ko Forestry Development Corporation	320	Dec 2018	Chuck Anderson
Tla' Amin Timber Products Ltd. (CFA)	322	Dec 2018	Rainer Gruenhagen
Powell River Community Forest Ltd. (CFA)	321	Dec 2018	Rainer Gruenhagen
Van Anda Logging Company Limited	342	April 2019	Chuck Anderson
Hagman & Son Logging Ltd.	343	April 2019	Chuck Anderson
Granet Lake Logging Ltd.	377	Feb 2020	Rainer Gruenhagen
H.S. Christensen Logging Ltd.	385	Feb 2020	Rainer Gruenhagen
Cortes Forestry General Partnership (CFA)	614	May 2020	Chuck Anderson

Chuck Anderson, Stewardship/Tenures Forester (604) 485-0714 [Chuck.Anderson@gov.bc.ca](mailto:Chuck.Anderson@gov.bc.ca)

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