



File: 18045-01

May 6, 2016

To: All forest licensees and forest professionals

By email

Re: Thompson Rivers Forest District, District Manager Letter of Expectation Regarding FSPs

The Ministry of Forests, Lands and Natural Resource Operations (FLNRO) is British Columbia's land manager responsible for the stewardship of Provincial Crown land, cultural and natural resources, with a vision of economic prosperity and environmental sustainability.

This District Manager (DM) Letter of Expectation regarding Forest Stewardship Plans (FSP) is intended to align with the FLNRO vision, build upon the March 2016 Chief Forester's Guidance, as well as provide local Thompson Rivers Forest District (DTR) content. As the delegated decision maker (DDM), I set these expectations in consideration of the unique operational circumstances of DTR and in consideration of the changing landscape and forest resource profile as a result of the impacts of forest health, fire, increased climate variability, and increased frequency and severity of drought.

As forest professionals, I expect that you manage the landscape and values of DTR consistent with the *Foresters Act* and the Association of BC Forest Professionals (ABC FP) code of ethics, practice standards, guidelines, and bylaws. I expect that all forest professionals are aware of the DTR November 29, 2011 letter titled, "FSP/WLP Submission – General Requirements for Forest Stewardship Plan (FSP) and Woodlot Licence Plan (WLP) Submissions".

The following expectations are intended to provide transparency regarding what I believe is necessary to consider when preparing replacement FSPs. This letter is not intended to include *all* expectations of forest professionals. As forest professionals, you are required to address all legal requirements in the *Forest and Range Practices Act (FRPA)* and its regulations, as well as consider pertinent Government objectives, policy guidance, best available information, and professional guidance.

The following expectations are not legally binding; however they do constitute policy guidance under the *FRPA* non legal realm.

My Expectations

I expect that the following DTR policies are considered as best practices:

- DTR District Manager Policy Regarding Disposition of Crown Timber on Grazing Leases, and
- DTR Authorization to Damage and Repair a Range Development on Crown Range

I expect that the outcomes of the following ongoing work will be considered as best practices:

- moose and watershed stewardship pilot (ratified April 5, 2016)

Type 4 Silviculture Strategy

I expect that forest professionals are aware of and consistent with the strategies within the Type 4 Silviculture Strategy for the Kamloops TSA.

Forest Health

As noted in the Chief Forester's Guidance, I expect forest professionals to review the annually revised DTR Forest Health Strategy to aid in the development of new FSP content.

Fibre Utilization

I expect an improvement in fibre utilization through consideration of the Improving Fibre Recovery Administrative Guide, December 14, 2015.

Fuel Management

I expect that forest professionals increase their awareness of fuel loading and fuel management.

Stocking Standards

I expect that forest professionals consider the recently released 2016 Fire Management Stocking Standards Guidance Document and the Updates to the Reference Guide for FDP Stocking Standards (2014): Climate Change Related Stocking Standards (draft). I expect that professionals remain up to date with stocking standard changes and guidance as it becomes available.

Invasive Plants

I expect forest professionals to increase their awareness and accountability to prevent the spread of invasive plants. I expect that the Invasive Plants Prevention Guidelines for FRPA Operational Plans and the Habitat Susceptibility to Invasive Plants by BEC Zone are considered best available information. Training of operators and staff, preventative practices, monitoring, plan for follow up monitoring and possible treatment are key to preventing expansion of invasive plants.

Lakes Local Resource Use Plans

I expect that forest professionals consider the Clearwater Forest District Lakes Local Resource Use Plan (LRUP): Lakeshore Management Guidelines (August 1, 2001) and the Kamloops Forest District Lakes LRUP: Lakeshore Management Guidelines (December 20, 2001) as best available information and management practices for managing lakeshores.

Mountain Caribou

Further to the 2009 *Government Actions Regulation (GAR)* Order for mountain caribou, I expect that the following documents be used as supplementary management considerations for management in mountain caribou habitat: Recovery Strategy for the Woodland Caribou, Southern Mountain population (*Rangifer tarandus caribou*) in Canada [Proposed] 2014 and Kamloops LRMP Appendix 10: Objectives and Considerations for Managing Mountain Caribou. It should also be noted that in 2015, Environment Canada identified proposed critical habitat for mountain caribou, which includes the identification of "matrix habitat".

Exemptions to Established Objectives

I expect that where an exemption to a result and/or strategy is warranted, *FRPA section 12* is the appropriate instrument. I expect that results and/or strategies will not be used to create exemptions or circumvent the exemption process established in legislation.

Expectations Regarding Thompson Okanagan Regional Management

Dry Belt Fir Ecosystems

I expect that forest professionals engage with MFLNRO regional specialists and DTR staff to review standards applicable to management of dry belt fir ecosystems, preferably before forest professionals commence

development of replacement FSPs. Core elements of the dry belt fir standards will be applicable to plan content including, but not limited to: FSP requirements respecting stocking standards, cut block size/adjacency, visual resource management and stand level retention.

I expect that dry belt fir stands will be managed in a manner that will maintain the existing structures and tree species composition of stands. Dry belt fir management will maintain the representation of Douglas-fir across the region's dry belt fir ecosystem. I expect forest professionals to enhance dry belt fir stands on the landscape for timber production, wildlife habitat, forest health, fire resiliency, forage production and range use. Silviculture systems and stocking standards for dry belt fir stands must be consistent with these expectations.

Watershed Management

I expect that forest professionals recognize the importance of managing cumulative watershed effects¹ to maintain water quality, quantity, timing of flows, stream channel dynamics, aquatic ecosystem integrity, fish and fish habitat that exist in all watersheds. I expect that forest professionals consider new hydrologic science and assessment guidance when considering the combined effects of forestry activities, other land uses, and other land users, within a watershed.

Stand and Landscape-level Biodiversity

I expect that forest professionals emulate the pattern of natural disturbances at a stand and landscape-level to maintain forest biodiversity and the diversity and abundance of native species and their habitats. I expect that professionals consider best available science on natural disturbance regimes, and build upon the existing coarse-fine filter legal designations and regulations that exist under *FRPA*, *Land Act* or higher level plans (HLP) where necessary.

Climate Change

I expect that forest professionals consider the "Adapting Natural Resource Management to a Changing Climate in the Thompson Okanagan Region: Considerations for Practitioners and Government Staff" and FLNRO Forest Stewardship Action Plan for Climate Change Adaptation. I expect that forest professionals consider the Climate Action Plan: Thompson Okanagan Region 2016 - 2020, paying special attention to the adaptation and mitigation strategies within the Plan.

Roads and Access Management

I expect that forest professionals consider the unintended cumulative impacts associated with access resulting from forest road development. I expect that forest professionals consider mitigating these impacts through such things as increased coordination, planning and implementation of access management.

Provincial Expectations

Water Sustainability Act

The *Water Sustainability Act* and regulations were enacted February 29, 2016 and I expect that forest professionals familiarize themselves with this new act and ensure consistency within their FSP and operations.

Visuals

I expect that forest professionals will not prepared results and strategies that exempt themselves from having to meet a Visual Quality Objective (VQO). Results and/or strategies should not be used to create exemptions or circumvent the exemption process established in the legislation. Where an exemption is warranted, *FPPR s12(7)* is the appropriate instrument. VQOs are defined in *FPPR 1.1*, and I expect that forest professionals will utilize and

¹ 'Cumulative watershed effects' (Scherer, 2011) refer to the changes in watershed processes caused by land use activities and (or) natural disturbances, and include: physical hydrology, riparian function, water quality and channel morphology. Forestry activities may accumulate, combine or interact with other activities to result in negative effects.

ensure consistency with these VQO definitions. Results and/or strategies that contradict the categories of alternation definitions will not be approved.

Expectations Regarding New Information and Best Management Practices to address FRPA Values

As the Chief Forester mentioned in her guidance document, in the decade since most FSPs were first approved, the landscape has changed and we have gained experience, knowledge and feedback.

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 associated with First Nations rights; cumulative effects on values; the goals and objectives in the Thompson Okanagan Climate Action Plan (2016); and goals in the *BC Water Sustainability Act* (2016). As a result, I expect that the following information be considered as new information or best management practices for managing within DTR.

Collaborative Planning and Cumulative Effects

I expect that forest professionals consider the potential resultant effects of multiple licensees on the resources within the landscape when developing their plans. Aquatic values are strongly influenced by factors of hydrology and geomorphology. Current watershed assessment guidance, new hydrologic research and cumulative effects assessment and monitoring suggest that the watershed scale is best suited to consider the effect of both past and planned forestry activity. Terrestrial values associated with forest biodiversity are also strongly affected by the amount and pattern of forest seral stages at a landscape level. Coordinated planning amongst forest professionals is required to achieve positive outcomes for these values.

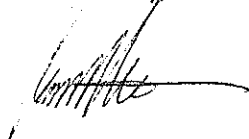
Results of Natural Resource Monitoring

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

I encourage you to commit to continued improvements in creating measureable and verifiable results and strategies within your FSPs, as identified within the Forest Practices Board report "*Forest Stewardship Plans: are they meeting expectations?*" and the Chief Forester's letter. My letter, attachments, and all referenced documents can be found on the FTP site at <https://www.for.gov.bc.ca/ftp/DKA/external/!publish/> under the folder DM Letter of Expectations Regarding FSPs.

In closing, I look forward to the continued success of the relationships you have established with FLNRO staff, the public, First Nations, and stakeholders within DTR. I encourage you to build upon your successes in the areas of collaboration, innovation and leadership; such as the Forestry Range meetings, the FSP subcommittee, the Kamloops TSA operating area discussions, the Kamloops TSA Web Map Service, and the Moose Watershed Pilot Project.

Yours truly,



Rick Sommer, RPF
District Manager
Thompson Rivers Forest District