Nine Alternative Performance Requirements You *Can* Propose

1. Soil Disturbance Limits
2. Permanent Access Structure Limits
3. Stocking Standards, Regeneration Date or Free Growing Date
4. Widths of Riparian Reserve Zones and Management Zones for Streams, Wetlands and Lakes
5. Cutting, Modification or Removal of Trees in a Riparian Reserve Zone
6. Road Construction in a Riparian Management Zone
7. Wildlife Tree Retention
8. Coarse Woody Debris
9. Measures to Protect Resource Features

☑ Default ✉ Alternative
Performance Requirements in the WLP Template

- You can accept the **Default** if you feel you won’t have a problem achieving it
- OR
- You can propose an **Alternative** performance requirement if warranted
  
  [Enter Detail]

You can accept the default over the majority of the WL area and propose an alternative over a specified portion of the WL area (i.e. a cutblock)

The advantage of accepting the default is that a default does not need to be written, signed by a professional or rationalized for the DM’s approval
When Should You Propose an Alternative Requirement?

- When you know the default performance requirement will cause you problems or inefficiencies and:
  - you can’t solve the problem with an exemption
  - you have a sound alternative performance requirement and good rationale that the district manager is willing to approve

- Propose conditions that the DM can attach to an exemption or approve as part of the alternative under FRPA section 112
Soil Disturbance Limits

WLPPR section 24

(1) The default performance requirement is an 8% maximum limit on soil disturbance
(2) Must not cause concentrated soil disturbance that would negatively impact productivity or hydrologic function
(3) Can exceed 8% if stumping or salvaging windthrow
Permanent Access Structures

- The default performance requirements set the following maximum limits for permanent access structures:
  - 7% of the total area of cutblocks ≥ 5 ha
  - 10% of the total area of cutblocks < 5 ha
  - 7% of the total WL area

- Write an alternative performance requirement to allow 12% permanent access structures due to large main roads in a 4 ha cutblock
  - WLPPR section 25(2)(a)
Stocking Standards

- **Default:** WLPPR s.35(1)(b)  Adopt the stocking standards as described in the MoF publication, *Reference Guide for FDP Stocking Standards*, as amended from time to time. See [http://www.for.gov.bc.ca/hfp/forsite/stocking_stds.htm](http://www.for.gov.bc.ca/hfp/forsite/stocking_stds.htm)

- **Option:** Use of the current stocking standards, described in the MoF publication “*Reference Guide for FDP Stocking Standards*”, the pertinent sections (including footnotes) are shown in Appendix II.

- **Alternative:** WLPPR s.35(1)(a)
Restrictions in Riparian Reserve Zone

- No cutting, modification or removal of trees unless specified in the WLP, or for:
  - Safety hazards
  - Topping or pruning for wind firmness
  - Building a stream crossing
  - Corridors for full-suspension yarding
  - Guyline tiebacks
  - Sanitation treatments
  - Felling trees for salvage if no material adverse impact on the RRZ
  - Establishing or maintaining a recreation site, trail or facility

- No road construction unless specified in the WLP
Restrictions in a Riparian Management Zone

A WL holder must not construct a road in a riparian management zone, unless:

a) the construction of the road is provided for in the woodlot licence plan;

b) locating the road outside the RMZ would create a higher risk of sediment delivery to the stream, wetland or lake to which the RMZ applies;

c) there is no other practicable option for locating the road;

d) the road is required as part of a stream crossing.
Wildlife Tree Retention

- A WL holder must ensure that the % of the WL area occupied by wildlife tree retention areas is no less than the least of the following:
  - the % specified in a land use objective;
  - the % specified in the WLP;
  - 8% of the WL area.

- An alternative performance requirement may propose a lower % of the WL area if:
  - Adjacent to a protected area with lots of wildlife trees
Coarse Woody Debris (CWD)

- Default Minimum requirement for CWD on areas where a free growing stand must be established are:
  - **On the Coast**: 4 logs per ha ≥ 5 m in length and ≥30 cm in diameter at one end.
  - **In the Interior**: 4 logs per ha ≥ 2 m in length and ≥ 7.5 cm in diameter at one end

- Alternative WLPPR s. 54(1)(a)

You can leave more CWD than the default without needing to propose an alternative

A higher limit for CWD in the WLP will not change the utilization standards or waste benchmarks permit
Resource Features

- Default WLPPR s.56(1)(b)
  - Ensure that forest practices do not damage or render ineffective a resource feature.

- Alternative - Specify measures
  - Relating to particular resource features
  - Provide rationale
RPF Signature and Seal

- Required for results, strategies and measures that do not have default performance requirements
  - Strategy for protecting FN cultural heritage resources
  - Wildlife tree retention strategy
  - Stocking information for specified areas
  - Measures to prevent the spread of invasive plants,
  - Measures to mitigate the effect of removing natural range barriers, and
  - any alternative performance requirements

- Seriously consider the benefits of the entire WLP being signed and sealed by an RPF
  - Risks, liabilities of managing a woodlot
  - Due diligence, professional accountability
Disclaimer & RPF Signature

- The ‘Disclaimer’ in the WLP template is suggested by the MoF as appropriate wording for an RPF to use when signing off the portion of the WLP that does not include the default performance requirements accepted from the WLPPR.

- The Association of BC Forest Professionals Bylaw 10.5 provides other wording that may be used to sign off the entire WLP when an RPF:
  - supervises the WLP preparation, or
  - reviews a WLP prepared by a non-professional and provides a signed and sealed statement that the WLP has been prepared to the standards expected of a member of the ABCFP.
Review and Comment

- One advertisement required in a local newspaper
- Referral may be required
- Must make reasonable efforts to meet with First Nations groups

Review and Comment Period

- normally 30 days
- at least 5 days, if an emergency
- > 30 days, if required by DM
Supplemental Information to be Submitted with Final WLP

- Copy of newspaper advertisement
- Description of any referrals
- Copy of any written comments received
- Summary of revisions made to WLP as a result of comments
- Summary of efforts made to meet with FN’s
- Any relevant exemptions received (optional)
- Rationales for any alternative performance requirements
Normal WLP Approval

- The WLP will be approved if the DM is satisfied the plan:
  - conforms to all of the WLP requirements,
  - is consistent with government objectives
  - is signed by an RPF

"Factors" relating to:
- land use objectives
- biodiversity
- objectives set by government for soils
- water, fish, wildlife and biodiversity in riparian areas
- cultural heritage resources
- stocking specifications
Emergency WLP Approval

- Timber in danger of being:
  - Damaged
  - Significantly reduced in value
  - Lost or destroyed

- >5-day review and comment period
Minor Amendments

○ Approval Required if an amendment adds or varies an Alternative Performance Requirement

○ Approval Not Required if:
  ● Correcting map or non-substantive data if it doesn’t
    ○ reduce the area where harvesting will be avoided or constrained
    ○ increase adverse impacts on forest resources
  ● Reclassifying a stream, wetland or lake
  ● It does not decrease the nature or quality of wildlife trees or wildlife tree retention areas
Mandatory Amendments

- If you (ought to) know that your plan won’t achieve the required results
  - Submit an amendment
  - Stop operations affected by the amendment

- If your actions or a natural event make the plan unachievable
  - Notify the district manager
  - Amend if required
  - Stop operations affected by the amendment
Amendments for New Objectives

- After a WLP is approved, if a new government objective is established and the WLP is inconsistent with the objective, a WLP amendment must be submitted for approval no later than 5 years after the date an objective is established.
Use of Seed WLPPR s.32

- Must comply with the Chief Forester’s Standards for Seed Use on areas where a CP was issued after the WLP was approved.

- Alternatives can only be approved by the Chief Forester if consistent with the standards:
  - cannot be approved by the District Manager.

Chief Forester’s Standards for Seed Use

- Must use seed orchard seed with at least 5% genetic worth if it is available at time of sowing
- 95% of seedlings planted in a fiscal year must comply with the seed transfer rules
- Alternatives are very unlikely to be approved by the Chief Forester unless consistent with these standards
Code Use of Seed WLFMR s.82

- For areas where a cutting permit was issued under a forest development plan, the District Manager can:
  - authorize the use of registered seed that is not of the best genetic quality source available, or
  - permit the limits for seed or vegetative material transfer specified in the Seed and Vegetative Material Guidebook to be exceeded.
Pre-Harvest Mapping

- Once the WLP is approved you can apply for CPs and RPs as long as they are consistent with the WLP.

- Before harvesting a new cutblock under the WLP you must prepare a map of the area showing:
  - the biogeoclimatic ecosystem classification to the site series, and
  - the stocking standards that apply.
Government Actions
Regulation Orders

Orders under the Government Actions Regulation can establish new:

- resource features
- lakeshore management zones
- scenic areas and visual quality objectives
- community watersheds and water quality objectives
- general wildlife measures
- wildlife habitat areas and objectives
- wildlife habitat features
- ungulate winter ranges and objectives
- species at risk, regionally important wildlife
- fisheries sensitive watersheds and objectives
- temperature sensitive streams
Government Actions Regulation Orders

- Section 2 of the Government Actions Regulation indicates that an order does not apply to an area where a CP or RP was issued before the order was established.

- This means the issued CP or RP does not need to comply with practice requirements that are linked to the item established by the order.

- With the exception of establishing species at risk, WL holders are to be consulted and notified prior to an order being established that may have a material adverse effect on the holder.
WLPPR Practice Requirements and Linkages to GAR

- When a GAR order creates a new item that is linked to a practice requirement the WL holder must comply with the practice requirement except on areas where a CP or RP was issued before the effective date of the GAR order.

- Example: A GAR order creates a new wildlife habitat feature and WLPPR section 56(2) requires the WL holder not to damage the wildlife habitat feature or render it ineffective.