



Forest Stewardship Plan Rationale Document

FOR

Lillooet TSA

Cascades Natural Resource District

Thompson/Okanagan Forest Region

**Originally Advertised August 2, 2017
Amended Edition Submitted January 8th, 2018**

FSP Term: 5 Years (2018 – 2023)

FSP ID # 379

Commencing: August 7, 2018



Trevor Ball, RPF
Date: July 24, 2018

"I certify that the work described herein fulfills the standards expected of a member of the Association of British Columbia Forest Professionals and that I did personally supervise the work"

Table of Contents

A - Response to District Manager Letter of Expectation Regarding Forest Stewardship Plans – June 2nd, 2016

B – FSP Content Clarification, by Section:

1. Interpretation
2. Application
3. Term
4. Forest Development Units
5. Results or Strategies
 - 5.1 Objectives Set By Government
 - 5.1.1 Old Growth Order
 - 5.2 Objectives Prescribed under section 149(1) of the Forest and Range Practices Act
 - 5.2.1 Soils
 - 5.2.2 Wildlife – FPPR Section 7 Notices
 - 5.2.2.1 Moose
 - 5.2.2.2 Coastal Tailed Frog
 - 5.2.2.3 Flammulated Owl
 - 5.2.2.4 Gopher Snake
 - 5.2.2.5 Spotted Bat
 - 5.2.2.6 Grizzly Bear
 - 5.2.2.7 Ungulate Winter Range (Mule Deer, Bighorn Sheep and Elk)
 - 5.2.2.8 Mountain Goat
 - 5.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Management Areas
 - 5.2.4 Wildlife and Biodiversity – Landscape Level
 - 5.2.5 Wildlife and Biodiversity – Stand Level
 - 5.2.6 Cultural Heritage Resources
 - 5.2.7 Water in Community Watersheds
 - 5.3 Other Designations and Objectives established or continued under FRPA
 - 5.3.1 Scenic areas with established VQO's
 - 5.3.2 Scenic areas without VQO's
 - 5.3.3 Interpretive forest sites, recreation sites or recreation trails – without objectives
6. Stocking Standards
7. Measures to Prevent the Introduction or Spread of Invasive Plants
8. Measures to Mitigate the Effect of Removing or Rendering Ineffective Natural Range Barriers
9. Notice, Review and Comment
 - 9.1 Advertisement
 - 9.2 Copies of Written Comments Received
 - 9.3 Description of Changes Made as a result of Comments
 - 9.4 Efforts to meet with First Nations Groups Affected by the Plan
 - 9.5 Efforts to Meet with All/Other Stakeholders Affected by the Plan

Appendix A – Consultation Summary Table

Appendix B – Lillooet FSP Referral List

A- Responses to District Manager Letter of Expectation Regarding FSP's

The following section outlines our responses to and considerations of the, “District Managers Letter of Expectation Regarding Forest Stewardship Plans,” dated June 2nd, 2016 (File: 18045-20/FSP Renewal 2016)-and how the **FSP** will address each issue –

By Email

To: All Licensees and Forest Professionals Operating in the Cascades Natural Resource District who are renewing Forest Stewardship Plans (FSP's)

Re: District Manager Letter of Expectation Regarding Forest Stewardship Plans

The Ministry of Forest, Lands and Natural Resource Operations (FLNRO) is responsible for the stewardship of Provincial Crown land and natural resources, and protection of BC's archaeological and heritage resources. Forest Stewardship Plans (FSPs) are one mechanism enables through the Forest and Range Practices Act (FRPA) that the Ministry uses to deliver its vision of environmental sustainability and economic prosperity.

In the decade since most FSPs were first approved, the landscape has changed and we have gained much experience, and improved our understanding of forests complexities and societal interests. As a result, I believe it is imperative that forest professionals manage beyond the legal objectives to realize environmental sustainability and appropriate social management of the FRPA values.

This District Manager Letter of Expectation regarding FSPs is intended to align with the FLNRO vision and to provide information and expectations that are in addition to the March 2016 Chief Forester Guidance.

As forest professionals you manage the forest related landscape and values in the Cascades Natural Resource District (CNRD) consistent with the Foresters Act and other related legislation. You are aware of you legal and ethical requirements. Therefore, the attached expectations, while not exhaustive, highlight key areas of concern that I believe warrant particular consideration when preparing replacement FSPs.

My staff will work to assist you in understanding the Chief Forester Guidance as well as the expectations contained in this letter. They have also been instructed to consider the Forest Practices Board report, Forest Stewardship Plans: Are They Meeting Expectations? and to consider the methodology used by the report's author to determine that Results, Strategies and Measures contained in your FSPs, are both measurable and verifiable.

My staff can also support your FSP development as you address specific areas of concern by arranging for Provincial experts (e.g. Ecosystem Specialists) to be available for discussion and/or training purposes. I encourage you to take advantage of this opportunity.

The following expectations are not legally binding but rather constitute policy guidance for the development of your FSPs.

Cascades Natural Resource District Expectations

First Nations

While legislation provides for sharing FSPs with First Nations it is my expectation that First Nations will be involved early and throughout the FSP development process. First Nations should be meaningfully involved and licensees should actively seek First Nations support and endorsement for your Results and Strategies.

With specific reference to Cultural Heritage Resource (CHR) values, First Nations should support your approach to CHR Results and Strategies and recognize the implementation f these will help ensure their cultural values are conserved and protected.

Your FSP should also recognize and demonstrate understanding of the agreements that government has with First Nation in the Merritt and Lillooet timber supply areas. Agreements such as Forest Consultation and Revenue Sharing Agreements and

the Land and Resource Decision Making Pilot Project (aka Shared Decision Making Pilot) with the Nlaka'Pamux Nation Tribal Council which is developing new shared decision making processes through which FSPs will be reviewed and vetted as well as subsequent operational forestry approvals and issuance. Licensees are to discuss these new approaches with the local FLNR First Nations Relations staff for guidance on how to proceed with FSP and operational plans First Nation information sharing.

1. First Nations

- (a) In preparation for the development of this replacement FSP, affected First Nations groups were invited to regular **FSP** committee meetings, beginning in April 2016;
- (b) active, meaningful and continual First Nations engagement was sought by Aspen Planers throughout the development of the replacement **FSP**;
- (c) **MFLNRORD** staff were also engaged to participate in the development of and to provide guidance to this replacement **FSP** and its' First Nations content;
- (d) acknowledgement and incorporation of the CAD systems for determination of affected First Nations parties during project referral;
- (e) in respect to agreements held between First Nations and provincial government, every effort has been made to ensure consistency with these agreements and protocols and this replacement **FSP**;
- (f) commitments have been made with regards to community-specific CHR protocols and various value management strategies, and many comments were incorporated in this **FSP**;
- (g) FSP results and strategies have been designed committing to developing protocol agreements and mitigation strategies with First Nations. This section also explains strategies in the absence of a protocol, or when agreement regarding mitigating strategies cannot be reached;
- (h) Aspen Planers continues to implement Best Management Practices that have been developed with specific First Nations groups and will continue to seek out and improve these practices and First Nations specific protocols.

Public Review and Comment

In their report on FSPs, the Forest Practices Board identified a significant failing with respect to public review and comment. The public seeks better opportunities to review and understand the content of the FSPs and the forest management intent they contain. I expect that your FSP will be written in a style that is easy for the public to comprehend and that there will be enhanced opportunities for the public to review and comment on both your FSPs and your subsequent operational forest management activities.

I suggest that it is also appropriate to commit to offer the public ongoing, regular opportunities to review your FSP and forest management activities – spatially and in text form. This will provide you with important opportunities to explain your forest development activities to a concerned public.

2. Public Review and Comment

- (a) In face of board review regarding less than satisfactory public consultation, open house review sessions will be offered in affected areas of the **FDU** (Lillooet) in an effort to increase awareness of the document and its intent and provide enhanced opportunities for the public to review and comment. Open House Meeting was held on June 15, 2017 (Lillooet).
- (b) ease of comprehension has been considered in the writing of this replacement **FSP** – this includes a more readable presentation of the obligations, strategies, and guiding legislation and regulation affecting forest management;
- (c) this replacement **FSP** and rationale document will be posted on the Aspen Planers Ltd. website to provide easier public review and comment, as well as for future operational updates (via ArcGIS online).

Defaults and Exemptions

It is my expectation that licensees will either commit to default practices in the Forest Planning and Practice Regulation or, propose alternative results and strategies (i.e. your FSP should not propose modified default results and strategies). Also, “self-exemptions” from results and strategies should not be proposed unless they are contained or limited to specified circumstances and particular areas (see FRPA bulletin 25 for guidance on flexibility options).

3. Defaults and Exemptions

- (a) This **FSP** has incorporated default practices, proposed results and strategies as well as alternative results and strategies that are contained or limited to specific circumstances and particular areas. Some of these alternate results and strategies are based on contemplated future events (such as **Damaged Timber**) and in situations where it is not practicable for the alternative to be consistent with the established objective, an exemption will be sought under the FPPR Section 12(7).

Best Practices

Forest Stewardship plans (FSPs) should take into account any best practices that have been shared, discussed and ratified at local Cascades Natural Resource District (CNRD) planning tables. For example, the “Old Growth Management Area Guidance Thompson Okanagan and the Cascades District Agreement for Managing OGMA Consolidation Mapping as Approved by DOIT Committee Members on July 15, 2013” is to be considered.

4. Best Practices

- (a) Best Management Practices stemming from local and higher-level roundtable discussions have been incorporated into this replacement FSP, including (but not limited to):
 - i. Old Growth Order;
 - ii. Wildlife (all);
 - iii. Riparian Management;
 - iv. Wildlife and Biodiversity – Stand Level;
 - v. Cultural Heritage Resources;
 - vi. Community Watersheds;
 - vii. Scenic Areas;
 - viii. Invasive Plants;
 - ix. Natural Range Barriers;
 - x. Stocking Standards (at a provincial level).

Climate Change

I expect Climate Change adaptation and mitigation strategies to be considered in your FSP. The documents: “Adapting Natural Resource Management to a Changing Climate in the Thompson Okanagan Region: Considerations for Practitioners and Government Staff and the, Forest Stewardship Action Plan for Climate Change Adaptation 2012-2017 February 27, 2012” and the “Climate Action Plan: Thompson Okanagan Region 2016 – 2020” will be considered.

5. Climate Change

- (a) Climate change adaptation and mitigation strategies will be considered through the development of stocking standards by the Thompson-Okanagan Stocking Standards Working Group;
- (b) A fair amount of flexibility exists currently, however improvement will be sought through future adjustments;
- (c) Increases to riparian management retention and stand-level retention level commitments will contribute to higher levels of carbon sink on the harvested landscape.

Roads and Access Management

Access resulting from forest development can lead to unintended cumulative impacts. I expect forest professionals will consider mitigating these impacts through such approaches as increased coordination, planning and implementation of access management with other forest licensees and non-licensee users, including First Nations communities, where appropriate.

6. Roads and Access Management

- (a) Current practices, including the soils result and strategy, minimize the amount of permanent access and encourages more temporary access structures wherever possible;
- (b) Promotion of temporary access levels versus permanent provide the opportunity to reforest and return more area to the THLB.
- (c) Outside of the **FSP**, best management practices are to reduce road density by employing the ‘No Net Gain’ concept in the Lillooet TSA (deactivation to equal construction, in a given calendar year).

Water Sustainability Act

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

7. Water Sustainability Act

- (a) Increased riparian consideration (retention, riparian management);
- (b) Watershed assessments;
- (c) Prompt road rehabilitation/deactivation and consistent maintenance to prevent failure or negative resource impacts;
- (d) Consideration of temperature sensitive streams/fisheries sensitive streams;
- (e) Made reference in R/S’s to the Water Sustainability Regulation Sec. 43 & 44 in regards to any stream crossings.

Forest Health

I expect the annually revised CNRD Forest Health Strategy will be reviewed to aid in the development of new FSP content.

8. Forest Health

- (a) The Annual Cascades Natural Resource District forest health strategy has been reviewed and issues have been considered during creation of this replacement FSP;

- (b) Commitment to addressing **Damaged Timber** (where applicable) has been incorporated in the FSP via the FPPR Section 12(7) process. An alternative strategy has been incorporated for VQO's, subject to a 12(7) exemption.

Fuel Management and Fire Management Stocking Standards

The CNRD is dominated by fire prone ecosystems, with many values at risk. CNRD working in partnership with Wildfire Services Branch develops annual Fuel Management Plans for the district. These plans incorporate measures and actions to reduce fuels in the Crown land/rural interface and create landscape level barriers and strategic fire suppression control points in mid to upper elevation areas. I will be seeking industry cooperation in assisting the district and Wildfire Services Branch in achieving these objectives.

I expect that licensees will conduct harvesting operations within the two kilometer interface zone around communities to balance all values unique to these areas, including fuel reduction and scenic considerations.

Our Ministry has recently released Guidance on Fire Management Stocking Standards. I expect forest professionals will consider this guidance for their FSPs as well as increase their awareness of fuel loading and fuel management. The most current district fire management plans, as well as local community wildfire plans should be consulted and addressed where appropriate.

9. Fuel Management and Fire Management Stocking Standards

- (a) Consideration of stocking standards that apply to fire management areas have been considered;
- (b) An application to the Forest Enhancement Society with regards to fuel management (long term fuel break creation, consistent with the CNRD) has been supported by Aspen Planers;
- (c) Interface/fuel management projects are ongoing (i.e. Comstock Interface Tenure) and more will be pursued within community interface areas;
- (d) For interface projects, stocking standards that are specific to these areas have been and will continue to be considered.

Invasive Plants

The Forest Practices Board was critical of the FSP measures for invasive plants. I expect forest professionals to increase their awareness and address their responsibility to prevent the spread of invasive plants by providing more robust measures. The Invasive Plants Prevention Guidelines for FRPA Operational Plans and the Habitat Susceptibility to Invasive Plants by BEC Zone are considered best available information. Key to preventing expansion of invasive plants and measures that support the training of operators and staff, preventative practices, monitoring, and treatments where necessary.

10. Invasive Plants

- (a) Increased commitments have been made for general awareness and identification of Invasive Plants, with special emphasis of High Hazard Invasive species;
- (b) Direction and guidance was sought from the three Invasive Plant committees in the district during the development of the measures contained in this replacement **FSP**;

- (c) Invasive plant reporting, monitoring, and prevention measures have all been addressed and improved upon.

Natural Range Barriers

The Forest Practices Board was critical of FSP measures for Natural Range Barriers (NRBs) finding the measures to be unnecessarily vague and lacking clear commitments to address NRBs. Removal of, or ineffectiveness of range barriers after harvesting has been an issue in the CNRD and was the subject of my direction in a letter dated August 2010 regarding “Natural Range Barriers on Range Pasture, Tenures and District’s Boundaries”. In addition to my 2010 direction, I expect forest professionals to demonstrate an awareness of FRPA General Bulletin Number 21 Managing Section 48 of the FRPA – Natural Range Barriers and reflect best practices for NRB in your FSPs.

11. Natural Range Barriers

- (a) Clear and measurable commitments have been outlined in this replacement **FSP** with regards to Natural Range Barriers;
- (b) Best practices with regards to referral to range agreement holders prior to **Cutblock** harvest and road construction have been considered and incorporated into this plan;
- (c) The consideration of required management on range areas in the absence of an agreement holder have been incorporated;
- (d) There is a requirement for joint mitigation strategies to be developed between the range agreement holder and the holder of this **FSP**.

Species at Risk

Best management practices for Species at Risk such as Williamson’s Sapsucker have been shared and I expect that the implementation of these management practices will be addressed in FSPs. It should be noted that the federal recovery strategy for Williamson’s Sapsucker was released in 2014 and Critical Habitat has been identified in this strategy.

12. Species at Risk

- (a) The *Best Management Practices for Timber Harvesting, Roads, and Silviculture for Williamson’s Sapsucker in British Columbia: Western Area of Occupancy* has not specifically been addressed in this replacement **FSP** as no overlap with this TSA has been identified; however plan-specific management strategies will be incorporated into each project area where they apply.
- (b) In general, all species at risk Best Management Practices are utilized by Aspen Planers, as they are shared.

Dry-Belt Fir Ecosystems

Dry Belt Fir Ecosystems represent a complex and challenging harvesting opportunity in CNRD. These ecosystems have multiple values, often competing, and are managed for timber production, wildlife habitat, forest health, fire resiliency, forage production, recreation and range use.

When developing FSPs, I expect forest professionals to be mindful of the current science and the competing values represented by these ecosystems. Stocking standards and appropriate silviculture systems for dry belt fir stands must

be consistent with these expectations. FLNRO regional specialists are available for discussion and training purposes to aid in your FSP development with respect to Dry Belt Fir areas.

13. Dry-Belt Fir Ecosystems

- (a) While there is no specific reference to management as it pertains to the complexities of these forest types, stocking standards, use expectations and overall forest health management, including interests and values presented by other forest users, have been considered in operational plans.
- (b) Wildlife considerations, continued focus on forest health, interface innovation, and cooperation with other stakeholders (range users and First Nations) embody continually-applied Best Management Practices by Aspen Planers. These pillars of management are key components within results and strategies designed throughout the FSP, including (for example) – commitment to mimic natural disturbance at a landscape level to ensure biodiversity, commitment to management of invasive plants and natural range barriers, and the commitment to increased cultural heritage resource management strategies.

Watershed Management

Management of Cumulative Watershed Effects to maintain water quality and quantity, timing of flows, stream channel dynamics, as well as aquatic ecosystem integrity, species at risk, fish and fish habitat must be recognized and managed for in your FSPs. I expect that forest professionals consider the best hydrology science and assessment guidance when considering the combined effects of forestry activities, other land uses and users, within all CNRD watersheds.

14. Watershed Management

- (a) Measurable commitments have been made throughout this replacement **FSP** with regards to temperature sensitivity and fisheries-sensitivity of streams, through more in-depth riparian classification strategies (i.e. multiple types of S6) and by increased retention;
- (b) A continued commitment to hydrologic assessment in operational plans will ensure that the overall effects on watershed flow timing and quantity are mitigated;
- (c) In terms of cumulative effects, landscape level monitoring (i.e. ECA analysis) regarding watershed hydrologic function is conducted as a Best Management Practice on any potentially affected watershed where harvesting is proposed;
- (d) Under Aspen Planers certification system requirements, commitments are made to ensure that where ECA threshold (35%) is proposed to be exceeded, hydrological assessments are conducted and the recommendations followed for the drainage;
- (e) In watersheds with a high potential for human consumption, hydrologic assessment is undertaken regardless of designation. Best Management Practices in these areas are often employed (i.e. increased retention levels);

- (f) As part of Aspen Planers certification commitments, high-risk stream impacts (i.e. crossings) are monitored to ensure potential water impacts are mitigated;
- (g) In developing the results and strategies contained in the **FSP** and this rationale document, consideration was given to current cumulative effect guidance, such as the Cumulative Effects Assessment for the Merritt Operations Trial, Multiple Resource Value Assessments (MRVA) for the Merritt and Lillooet Timber Supply Areas, FREP extension notices, Small Stream Workshop recommendations, as well as the Water Sustainability Act;
- (h) In terms of points of diversion, Aspen's Best Management Practice is to refer to all users (licensed or not), and will often manage around them in a manner similar to them being in a community watershed;
- (i) In addition to the above guidance, a strong emphasis on streams, watersheds, and cumulative effects from First Nations was expressed and concerns were incorporated in management strategies.

Stocking Standards

I expect forest professionals to address emerging forest health issues, fire management considerations, or emerging effects of climate change in their FSP stocking standards. Forest professionals should consider the Updates to the Reference Guide for FSP Stocking Standards (2014). I expect that professionals remain up to date with stocking standard changes and guidance as it becomes available.

15. Stocking Standards

- (a) The currently approved standards have been incorporated into the draft replacement **FSP**.
- (b) New standards as developed by Licensees and **MFLNRORD** will be amended into the **FSP** at a later date, once completed.

Stand and Landscape-Level Biodiversity

Natural disturbance patterns at a stand and landscape-level help 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, stand level biodiversity and coarse woody debris, and build upon the existing coarse-fine filter legal designations and regulations that exist under FRPA or the Land Act where necessary.

16. Stand and Landscape-Level Biodiversity

- (a) Largely the Results/Strategies for both stand and landscape level biodiversity have been derived from the default practices;
- (b) At the landscape level, Aspen has recently conducted patch size analysis to determine current distribution and future opportunity to emulate temporal and spatial disturbance distribution;

- (c) In terms of contributing to both the landscape and stand level biodiversity - the WTP retention level has been simplified to 7% for all harvesting, which mimics the practice requirement, versus the previous % by BEC zone;
- (d) Also, Aspen has, at the stand level, committed to exceed past practice in terms of block size requiring WTR – blocks as small as 2 ha will have WTP area attributed to the opening, with emphasis to meeting the characteristics of the stand proposed for harvest;
- (e) A replacement process has been built into the Result and Strategy for “Restrictions on harvesting WTR”, similar to the 91(2) exemption process which would have to be used if FPPR Section 67 had been adopted.

Collaborative Planning and Cumulative Effects

The combined effect of the activities of multiple licensees affects both aquatic and terrestrial values. 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 forest activity. Terrestrial values associated with forest biodiversity are also strongly affected by the amount and pattern of forest seral stages over the broader landscape and require a broader focus to achieve positive outcomes for these values.

Given our growing knowledge and recent results from cumulative effects assessment, I believe there is a mounting case for collaborative planning across watersheds or at least within timber supply areas. On this basis I believe a case can be made for the development of a single FSP shared by licensees within a timber supply area. While I am hopeful for such an approach I recognize that licensees may prefer their own plans. If this is the case, I expect that licensees strive for the highest level of consistency possible through coordination and collaboration with other licensees.

The Cumulative Effects Assessment for the Merritt Operational Trial – March 2015 provides information with respect to Fish Habitat, Mule Deer, Moose, Visuals, Grizzly Bear, Old Growth Management Areas, and Watershed Condition. This document and its recommendation for the resource sector should be considered during FSP development.

17. Collaborative Planning and Cumulative Effects

- (a) The Major License Holders, as an **FSP** committee, within the Cascades district have been meeting since April, 2016 to develop R/S's and an **FSP(s)** that would allow a high level of consistency if not identical R/S's;
- (b) Ministry staff have also been in attendance at all of these meetings so they would be fully informed and inclusive of discussions around R/S's;
- (c) Substantial and continual effort was made by Aspen Planers to invite First Nations to be part of this **FSP** committee developing new R/S's, and they did participate to some extent; however, First Nations groups did engage outside of the Cascades District FSP Committee process (See Appendix A);
- (d) All core First Nations/representative groups in the TSA were provided information regarding the new **FSP** prior to advertising with the request to meet and discuss the

content and/or any questions or concerns they may have had. These include, but are not limited to: Boothroyd, Bridge River, Cayoose Creek, Cook's Ferry, LTC, Lytton, Mount Currie, NNTC, NTA, Nicomen, N'Quatqua, Seton Lake, Siska, SCC, T'it'q'et, Ts'kw'aylaxw, and Xaxli'p. Attempts for further meetings were undertaken throughout the advertising period with regard to new **FSP** and First Nations' interest, with some success;

- (e) The latest Cumulative Effects Report, *Cumulative Effects Assessment for the Merritt Operational Trial*, (DRAFTv3.0, March 2015) has been reviewed, and the results and strategies contained in the **FSP** for the main topics of the report – Fish Stream Habitat, Moose Populations, Mule Deer Populations, Visual Quality Objectives, Grizzly Bear Populations, and Old Growth Management Areas (OGMA) - are in line with the recommendations made therein, and best management strategies have been designed with these recommendations where forest management is concerned. In addition, we recognize that current and upcoming GAR orders will further the cumulative effects considerations and drive site-specific management considerations outside of the direction of the FSP.

Results of Natural Resource Monitoring

I expect that forest professionals will continue to improve their management of the FRPA values and use tools such as Forest and Range Evaluation Program and Multiple Resource Value Assessments to learn and improve on practices.

18. Results of Natural Resource Monitoring

- (a) Consideration has been given to recent FREP monitoring reporting conducted in the Thompson-Okanagan Region (via regional report #41) and changes to specific results and strategies have been made based on report trends (for example, the careful development of Alternate Results and Strategies and more specifically, increases over current **FSP** commitments with regards to small stream retention).

Integrated Silviculture Strategy

Licensees should be aware of the Integrated Silviculture Strategy (ISS) current being developed for the Merritt Timber Supply Area post TSR 5. Licensees should participate in the ISS development process and FSPs should consider the direction and recommendations that may be available from ISS albeit in the future.

19. Integrated Silviculture Strategy (ISS)

- (a) Aspen is aware and currently involved in development of the ISS, is willing to participate in the process and will consider the direction and recommendations that may become available in the future.

Forest Practices Board Audits and Recommendations

Finally, I encourage licensees to heed the advice in the Forest Practices Board audits and reports and commit to ensuring that results, strategies and measures are measurable and verifiable.

20. Forest Practices Board Audits and Recommendations

From the onset of the development of the new **FSP**, Aspen Planers and other tenure holders within the Cascades District have been actively reviewing Forest Practices Board audits and we have ensured all results, strategies and measures are measurable, verifiable, and consistent with the objectives.

Closing Remarks

I look forward to the continued success of the relationships you have established with FLNRO staff, the public, First Nations, and stakeholders within CNRD. I encourage you to build upon your successes in the areas of collaboration, innovation and leadership. The recent establishment of a Licensee FSP subcommittee bodes well for the creation of an FSP(s) that is complete, collaborative and in the best position to address the FRPA values, objectives and cumulative impacts, First Nations and the broader societal interests. I wish you well in moving forward on this important process. My staff are ready and willing to assist.

My letter, attachments, and all referenced documents, including the Forest Practices Board report, can be found on the FTP site located at http://www.for.gov.bc.ca/ftp/DCS/external!/publish/FSP_Renewals%202016/.

*Yours truly,
(Original Signed)*

*Charles (Chuck) van Hemmen, RPF
District Manager
Cascades Forest District*

1. Interpretation

1.1 Definitions

“**Act**” means the Forest and Range Practices Act S.B.C 2002, c 69;

“**CP**” means a Cutting permit;

“**Current**” means, in the context of a FDP, FSP, timber sale licence, **CP** or **RP**, an approved document that has not expired or been replaced;

“**Cutblock**” - There is no definition of “**Cutblock**” in *FRPA* or its regulations but, since the term is used independently or as part of another term (see below) in a number of results or strategies, it is important that it be appropriately defined so as to clarify the specific commitments.

“**Damaged Timber**” means timber that has been affected by insects, disease, wind, fire, or other similar agents and is in danger of being significantly reduced in value, lost, destroyed, or poses risk to adjacent timber.

“**Date of Submission**” means the date this *FSP* was submitted for approval;

“**Established Cutblock & Established Roads**” - This definition identifies those *Cutblocks* and roads (see above definition) that contribute to thresholds in results or strategies that apply across areas larger than the *Cutblock* level. It is meant to address how the actions of multiple operators will be considered when determining compliance with the commitment. The definition gives precedent to *Cutblocks* and roads based on timing of certain planning or contractual milestones.

“**FDU**” means a forest development unit;

“**First Nation Band**” means a band, as defined by the Indian Act, R.S., 1985, c. I-5;

“**Forest Act**” means the *Forest Act* R.S.B.C. 1996, c.157;

“**FN**” means First Nation;

“**FPC**” means the Forest Practices Code of British Columbia Act R.S.B.C. 1996, c. 159 and all regulations thereunder;

“**FPPR**” means the Forest Planning and Practices Regulation B.C. Reg. 14/2004;

“**FRPA**” means the Forest Planning and Practices Regulation B.C. Reg. 14/2004;

“**FSP**” means a forest stewardship plan;

“**Holder of this FSP**” means, for each Licence specified in the *FSP* document, the holder of that Licence as indicated in that Paragraph, or any successor or assignee of that holder; “Holder” has the same meaning; and “Holders of this FSP” means all of those holders of those Licenses or any successor or assign to those holders;

“**ILMB**” means Integrated Land Management Bureau;

“**Legislated Planning Date**” – This definition simplifies subsequent drafting of *FSP* content by assigning a defined term to planned and periodic change provisions contained in the legislation.

“**MFLNRORD**” means Ministry of Forests, Lands and Natural Resource Operations and Rural Development;

“**QP**” means Qualified Professional;

“**VQO**” means Visual Quality Objective;

“**VSC**” means Visual Sensitivity Class.

1.2 Relevant Date for Legislation and Objective References

This provision establishes a default date that determines which version of the legislation, objective, notice, etc. is being referenced. Only exceptions to this default rule would then need to be explained in subsequent provisions of the *FSP*.

1.3 to 1.11 Legal Conventions

Provisions identify legal convention to be used in interpreting the *FSP*.

1.9 Conditional Exemptions – the purpose of this table is to highlight those areas of the regulation that allow for a conditional exemption, allowing the licensee to design an alternative result or strategy, or can choose to adopt the section as written. Based on public comment, there has been a clarification statement added to the bottom of the table to denote that even though sections were not specified as adopted, they continue to apply (licensee was not seeking an exemption, nor could they, based on the omission of this statement).

1.10 Development Project in government’s interest has been defined and this is statement is to apply to any *FSP* result or strategy to be clear the *FSP* may not apply in certain circumstances where these types of projects are spear-headed by the government.

1.11 FPPR Section 12(7) Exemption

Again this may apply to any Result and Strategy where it has been determined by the *Minister* that one is exempt from the requirement to specify one that is consistent. The *FSP* Results and strategies will not apply as written. Rather than inserting this and the section above into each R/S the statements have been written only once in this section.

2. Application

N/A

3. Term

N/A

4. Forest Development Units

This *FSP* applies to operations in *FDU A*.

5. Results or Strategies

Based on public and written comments during the advertisement of the Lillooet *FSP*, in regards to certain values managed under this *FSP*, all works pertaining to this *FSP* and its execution are overseen by Qualified Registered Professionals.

This excerpt from the Professional Reliance in Forest & Range Management in British Columbia – From Concept to Practice Committee Report (2006) has been included to add clarity as to the conduct of a member of the Association of BC Forest Professionals, as an example of the conduct expected from a *QP* (beginning on page 8):

The Obligations of Individual Professionals

A resource professional is bound by the legislation under which he or she operates, and by the conditions of membership in the self-regulating professional body. This includes adherence to bylaws that may include codes of ethics, standards of conduct, and other such direction provided by the profession. Each of the self-regulating professional bodies has a code of ethics that sets out the obligations that are binding on members. Although the codes may vary in format and specifics (and therefore should be referred to directly when questions arise), they all include requirements that reflect a professional’s responsibility to the public, the resources, employers and the profession.

Typical requirements are:

An Obligation to the Public - *A professional will hold paramount the safety, health and welfare of the public, the protection of the environment and promote health and safety within the workplace.*

Practice Within Areas of Qualification - *A professional will undertake and accept responsibility for professional assignments only when qualified by training or experience.*

Professional Opinion - *A professional will provide an opinion on a professional subject only when it is founded upon adequate knowledge and honest conviction.*

Confidentiality and Disclosure - *A professional will act as a faithful agent of their client or employer, maintain confidentiality and avoid conflict of interest but, where such conflict arises, fully disclose the circumstances without delay to the employer or client.*

Duty to Profession - *A professional will uphold their professional obligations over those of their client or employer.*

Appropriate Compensation - *A professional will uphold the principle of appropriate and adequate compensation for the performance of professional work.*

Maintain Competence - *A professional will keep themselves informed in order to maintain their competence, strive to advance the body of knowledge within which they practice and provide opportunities for the professional development of their associates.*

Conduct Toward Clients and Colleagues - *A professional will conduct themselves with fairness, courtesy and good faith towards clients, colleagues and others, give credit where it is due and accept, as well as give, honest and fair professional comment.*

Presentation of Consequences - *A professional will present clearly to employers and clients the possible consequences if professional decisions or judgments are overruled or disregarded.*

Respond and Report on Contraventions - *A professional will bring attention to, and if necessary to rectify, will report to their association or other appropriate agencies any hazardous, illegal or unethical professional decisions or practices by other professionals.*

Extend Public Knowledge - *A professional will extend public knowledge and appreciation of their profession, and protect their profession from misrepresentation and misunderstanding*

Further information regarding the Committee Report can be found at the following link:

http://member.abcfp.ca/WEB/Files/publications/Professional_Reliance_Forest_Range_Management.pdf?WebsiteKey=4b6af123-da4f-4a97-a963-579ada9e5955&=404%3bhttp%3a%2f%2fmember.abcfp.ca%3a80%2fWEB%2fabcfp%2fFiles%2fpublications%2fProfessional_Reliance_Forest_Range_Management.pdf

5.1 Objectives Set by Government

5.1.1 Old Growth Order

- (a) These strategies are based on the work of the CNRD Old Growth Management Area (OGMA) Advisory Committee. The original OGMA layer is based on Draft 4 of the Old Growth Management Areas for the Lillooet TSA, which is considered to meet the intent of the provincial non-spatial order that came into effect June 30, 2004.
- (b) On May 11, 2006 Integrated Land Management Bureau distributed a draft “Regional Management Guide for Old Growth Management Areas” to all participants of the OGMA committee;
- (c) this document contains practices governing operations within OGMA’s and when replacement should occur and has been used as guidance;
- (d) the strategies in this **FSP** are based on the above mentioned document;
- (e) the current Strategy for the Old Growth Order incorporates polygons as described by the most current consolidated Old Growth Polygon layer on the map housed by the **MFLNRORD**. This is in accordance with the Cascades NRD Agreement for managing OGMA’s as approved by the DOIT committee members on July 15, 2013;
- (f) incursions are generally for recovering timber damaged by insects, fire or similar events, but can also occur for other reasons that are operational in nature;
- (g) the replacement policy found in the guidelines has generally been adopted in this strategy where any incursion greater than 1 ha is replaced;
- (h) the replacement area is then sent to the keeper of the consolidated data and the Old Forest Layer is updated annually through this strategy;
- (i) Based on written comments received during advertisement, several minor changes were made to the strategy including a 10% incursion threshold for when incursions are to be less than 1 ha; identification of the replacements prior to harvest vs. prior to reporting of harvest completion; and a commitment that all replacements will be equal to or greater than vs. of similar size; further explanation was added to the Paragraph 5.1.1.3 (d) (ii) (C) to include more information as to replacement attributes (in particular, the age) rather than referring to sections of the order.

5.2 Objectives Prescribed under section 149(1) of the Forest and Range Practices Act

5.2.1 Soils Objective

Definitions for “Gross Cutblock Area” and “Percent of Cutblock occupied in permanent access structures” were added for clarity on the procedures used to measure the outcomes. These were derived from FREP extension note #28 (January 2014 Revision) dealing specifically with temporary access:

- (a) most of the default for soils has been accepted in this FSP; however, the following specific items were changed:
 - (i) 35(4) was changed to remove the limit of exceeding soil disturbance by more than 5% for temporary access. It was replaced with two provisions:
 - A. the first, under Paragraph 5.2.1.3 (b) (i), allows temporary access percent on SUs not comprised of sensitive soils to “borrow” from unused permanent access via “*Temporary Access Allowance*.” This change is required to encourage the use of temporary access structures rather than permanent access structures. Based on comments received, as well as comments received from the *MFLNRORD* on review of the Merritt TSA FSP, restricted this result to apply only to soils that were not sensitive;
 - B. the second, under Paragraph 5.2.1.3 (c), allows for no limit on temporary access as long as the SU NAR is less than 5 ha, and the soils are not “sensitive soils.” This change is required to enable the use of temporary access structures in small standard units;
 - (ii) both require rehabilitation to be in compliance with section 35(3) of the FPPR;
- (b) 35(6) and 35(7) were essentially ‘adopted as a result or strategy’; however, in order to ensure that cross references between sections of the regulation, and the *FSP* were correct and meaningful, we have embodied the text of section 35(6) & 35(7) into the FSP. Specifically Paragraph 5.2.1.3 has replaced reference to section 35(4).

5.2.2 Wildlife Objective

Best Management Practices

While not specifically listed under each applicable species that the Best Management Practice for wildlife applies to, these strategies are employed to fulfill multiple management strategy requirements:

- a) Visual screening (moose, ungulates, bears, etc.);
- b) Access Management and No Net Gain concept (limiting hunting pressures);
- c) Enhanced riparian management (basal area retention)
- d) Small mammal habitat commitments (fisher)
- e) Incorporation of traditional knowledge (wildlife and human uses)

5.2.2.1 Moose

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required. Supporting information was also posted.

The result or strategy in this *FSP* considered the following:

- (a) **Thermal Cover** by retaining a significant amount of the forested area in each **Moose Management Unit** (where key habitat exists). **Moose Management Units** were derived based on analysis done in 2015 by Hedberg and Associates Consulting Ltd. for the Lillooet TSA. Also, an emphasis for enhancing **Moose Forage** (palatable species of plants that are a food source for moose, including willow (*Salix spp.*), aspen (*Populus spp.*), birch (*Betula spp.*) and red-osier dogwood (*Cornus stolonifera*));
- (b) **Visual Screening** (vegetation or topography) between **Extended Use Roads** and **Moose Management Units** to provide cover for moose;
- (c) Based on written comments received, the strategy was adjusted to focus on both **Moose Forage** while achieving free growing status, while not giving precedence to one value over the other;
- (d) on a **Moose Management Unit** level, considers the total wildlife tree retention to ensure adequate retention.
- (e) Based on written comments received, a more in-depth definition of **Moose Management Units** was added; and, a **Moose Management Units** layer has been added to the *FSP* maps.

5.2.2.2 Coastal Tailed Frog

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required. In addition to the notice, mapped occurrence data was posted at:

ftp://ribftp.env.gov.bc.ca/pub/outgoing/cdc_data/Approved_FRPR_sec7_WLPPR_sec9_Notices_and_Supporting_Info/Species_at_Risk/Cascades_FD/Supporting_Info/Spatial_data_by_species/cascades_tailed_frog_2.shp

The result or strategy borrows from the “Accounts and Measures for Managing Identified Wildlife – Accounts V.2004”.

Suggested measures for access include, “**minimize roads or stream crossings within the core area.**” Since this statement alone would not be measurable, our result adds to this statement, “**by not constructing roads unless required for a stream crossing and no practicable alternative road location exists**”. There is no intention for a “self-exemption”; rather, this is the result or strategy based on the accounts and measures as indicated above with the intent to minimize crossings.

Also, when a stream crossing is required a specific Tailed Frog assessment will be completed by a **QP** which will assess potential impacts and make recommendations regarding design and installation. There is then a commitment to construct the crossing consistent with the design as well as the Water Sustainability Regulation Sections 43 & 44.

- (a) While not expressly discussed in the result or strategy, the following will also contribute to the conservation of sufficient habitat for coastal tailed frog:
 - (i) limitations on allowable annual cut during the term of this FSP;
 - (ii) the result or strategy for:
 - (A) Old Growth Order Polygons;
 - (B) Wildlife and Biodiversity – Landscape Level;
 - (C) Wildlife and Biodiversity – Stand Level;
 - (D) Water in Community Watersheds;
 - (E) Water, Fish, Wildlife and Biodiversity within Riparian Management Areas, including:
 - (I) Limitations on harvesting in a Riparian Reserve Zone; and
 - (II) Retention in a Riparian Management Zone;

- (III) The amount and distribution of non-Timber Harvesting Land Base;
 - (IV) Other practice requirements within **FRPA** related to water quality;
 - (V) Other enactments (e.g. Federal Fish Act, Water Sustainability Act);
 - (VI) UWR for Mule Deer, Big Horn Sheep and Elk;
- b) Based on comments received, as well as changes requested by the **MFLRORD**, definition of an occurrence site now includes locations provided by **MFLNRORD** prior to planning and layout of a cutblock.

5.2.2.3 Flammulated Owl

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required. In addition to the notice, mapped suitability data was posted at:

ftp://ribftp.env.gov.bc.ca/pub/outgoing/cdc_data/Approved_FRPR_sec7_WLPPR_sec9_Notices_and_Supporting_Info/Species_at_Risk/Cascades_FD/Supporting_Info/Spatial_data_by_species/flam_owl_suitability.shp

Target area for suitable Flammulated Owl habitat as per the Cascades Forest District Section 7(2) Notice has been met in the Lillooet TSA as a result of the Flammulated Owl habitat overlap with **Old Forest Polygons**, inoperable and non-THLB area in the district. Old growth stand attributes, suitable for habitat, will be considered for WTP development on a project by project basis.

The table below demonstrates that the area of suitable Flammulated Owl habitat within **Old Forest Polygons** within the Lillooet TSA is 121% greater (8942 ha of a total 4050ha required) than the total area required for Flammulated Owl in the Cascades Forest District in the Section 7(2) notice. This table was derived using the habitat requirements as outlined in the Section 7 Notice for Flammulated Owl. Thus, commitments within the **FSP** to manage **Old Forest Polygons** will provide adequate suitable habitat for Flammulated Owl.

Flammulated Owl Habitat query for the Lillooet TSA was determined using the following parameters:

- a) Based on the Accounts and Measures (2004) for Flammulated Owl, queried in the following order:
 - (i) by suitable tree species (Fd/Fdi/Py) that have an age class of 6 or greater;
 - (ii) by desirable biogeoclimatic units;
 - (iii) by overlap with suitable OGMA with same biogeoclimatic variation;
 - (iv) by overlap with 2015 THLB layer;

	Suitable Flammulated Owl habitat in the TSA	Owl habitat overlapped by Old Forest Polygons	Owl habitat overlapped by THLB	Owl habitat overlapped with OGMA and THLB	Area required by Section 7 notice
Area (ha)	70,349 ^a	8942 ^a	22,561 ^a	2186 ^a	4,050 (total) ^b 3150 (THLB) ^b

^a Within the Lillooet TSA

^b Within the Cascades Forest District

5.2.2.4 “Great Basin” Gopher Snake

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required. The type of habitat required is identified on the map in appendix B and the result and strategy to avoid these habitats will sufficiently protect this species.

The Result was built based on the “Accounts and Measures for Managing Identified Wildlife – Accounts V.2004”.

The suggested measures use language that may be difficult to measure so the result was written to be more concise. Such as, “**not construct a road unless no practicable alternative location exists.**” This should not suggest roads are not allowed, and if one reads the accounts and measures it is similar in that in the suggested measures it starts off with, “**Place roads as far as practicable from hibernacula and...**”.

Under 5.2.2.4.2 (d)(iv) where there is the need for a permanent road, any management strategies required will be determined by the Ministry as per the suggested measures in the notice. Then there is a commitment to implement them.

Based on comments received, definition of an occurrence site now includes locations provided by *MFLNRORD* prior to planning and layout of a cutblock.

5.2.2.5 Spotted Bat

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required.

The Result was built based on the “Accounts and Measures for Managing Identified Wildlife – Accounts V.2004”.

Based on comments received, definition of an occurrence site now includes locations provided by *MFLNRORD* prior to planning and layout of a cutblock.

5.2.2.6 Grizzly Bear

The strategy states that Aspen will comply with the Proposed General Wildlife Measures for Grizzly Bear Specified Area in Lillooet TSA as developed by the *MFLNRORD*. Upon approval of the GAR Order for Grizzly Bears, the holders of this FSP will be exempted from the requirement to prepare a result or strategy for Grizzly Bears and the GAR order will replace this strategy.

5.2.2.7 Ungulate Winter Range (Mule Deer, Bighorn Sheep and Elk)

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required.

The Result was built based on the “Accounts and Measures for Managing Identified Wildlife – Accounts V.2004”.

5.2.2.8 Mountain Goat

A notice was issued under section 7(2) of the Forest Planning and Practices Regulation. The notice identified amount, distribution, and attributes of habitat required.

The Result was built based on the “Accounts and Measures for Managing Identified Wildlife – Accounts V.2004”.

5.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Management Areas

Most of the defaults for water, fish, wildlife and biodiversity within riparian management areas were adopted in this *FSP* under Paragraph 5.2.3.2 with the addition of 5.2.3.3 to 5.2.3.6.

In addition, as there are no default practices in regards to riparian management zones for major tenures holders, specific results and strategies are required, under Section 8 and 12 (3) of the *FPPR*.

5.2.3.3 Retention in Riparian Management Zones

When required to protect a riparian reserve zone, there will be retention within the RMZ within the block.

The retention in RMZ’s generally exceeds those stated in section 52(1) of the *FPPR* for minor tenures. The values listed under this paragraph are minimums and should not be considered as targets in all cases – rather, these retention levels may be increased, on a site-by-site basis, based on the judgment of a *QP* and/or based on area-specific community agreements regarding riparian management.

Of note are:

- (a) W3 wetlands were split into small (1 - <3 ha) and large (3 – 5 ha) and prescribed at 10% and 25% retention respectively. Often more retention will be left in these areas as these locations represent good anchors for WTR which, when chosen, results in 100% retention. But because these decisions are site specific, flexibility was built into the **FSP**;
- (b) L1-A and L1-B are not referenced because they do not have riparian management zones;
- (c) only the small S6 streams under 1.5m wide and those S6's with harvest methods other than ground based indicate 10% RMZ basal area retention. This lower retention allows accommodation of various stand management strategies, with consideration to the following:
 - (i) these streams will all have a 5 m No Machine Zone (NMZ) established prior to harvest;
 - (ii) in turn, the standard practice is to retain, where practicable, understory brush, poles, saplings and regeneration - variable retention levels of layers 2, 3 & 4, within riparian management areas in the norm;
 - (iii) this level of retention allows the logging supervisor to make on-site decisions around leaving only the best, wind-firm stems;
 - (iv) other stream features (such as coarse woody debris and streamside vegetation) may exist and will be protected by no-machine flagging – this, in addition to preservation of non-merchantable understory pole, sampling, regen and riparian management area brush will contribute to maintaining small stream values (for example, temperature, water quality, and habitat protection);
- (d) where basal area retention is required, two options may exist to ensure it is retained – either prescriptive measures will be written into the SP (in terms of stems per ha to retain, based on piece size), or a hard reserve will be established (excluded) from the **Cutblock**.

i.e. 25% basal area retention on a 30m RMZ (i.e. W3) = either

- b) 7.5m reserve area to be excluded from the block; or
- c) 25% of basal area to be retained dispersed within the 30m RMZ.

The decision regarding retention choice (basal area vs. reserved stems, or some combination thereof) and the amount of retention will vary depending on timber type, susceptibility to future

forest health issues, blowdown and the potential for stream bank disturbance, operational constraints, or other known values (i.e. water, cultural, wildlife values, OGMA, etc.)

- (e) Best management practices are to take all necessary measures to determine the presence of fish on all default S4 streams. Where fish presence is confirmed, and on S4's in community watersheds, every effort will be made, where practicable, to establish a 10m reserve zone to enhance protection of small stream values. Alternatively, 30 % basal area retention measures contributing to stream value preservation will be established (i.e. 30% approximates the equivalent retention provided by a 9m reserve).

Where dispersed retention is proposed the intent would be to evenly distribute this retention within the RMZ along the feature and usually concentrated nearest to the riparian feature. While this is the normal practice there will be situations where it is not possible or practicable for various reasons, including no suitable wind-firm species, voids, damaged or infested timber (green attack), or as otherwise indicated in 5.2.3.3.

The second part of the result under 5.2.3.3 is necessary for the stated reasons and will not always result in less than the stated retention when there is a larger RMZ and would normally be used where these activities preclude leaving the stated RMZ retention % on small areas of RMZ. These are similar to the FPPR Sections 50(1) and 51(1) which were adopted in paragraph 5.2.3.2.

A Few Examples:

- a block that has a stream near one corner where it is determined that a road with a stream crossing is required. The RMZ on this S6 stream is 20m, but only a 20m reach section occurs within the block. There is no other option for the road location. This would result in less than the committed-to basal area retention.
- The retention in a larger portion of an RMZ is affected, i.e. a block where, due to terrain, etc., the only practical option for the road location is partly or wholly within some amount of the RMZ (where parallel to the stream is the only practicable option for the road location);
- Instances of cable logging requiring cross-stream yarding vs. the value impacts (i.e. increased soil degradation, more permanent access, additional stream crossing etc.) of building a road to the other side of the stream.

Based on comments received, the definition of **Sanitation Treatment** was added to provide clarity. As well, the original Paragraph 5.2.3.3 (d) was re-written based on this comment to refer to **Damaged Timber**, versus the original wording.

5.2.3.4 Restricted Operation of Machinery

This is an extra commitment over the current *FSP* which restricts machinery within 5m of a stream. These NMZ's are also established on NCD's.

5.2.3.6 Stream Crossings – Protection of Water Quality and Aquatic Ecosystems

This paragraph was added to highlight the sections of the new Water Sustainability Act and Regulations that are applicable to stream crossings.

5.2.4 Wildlife and Biodiversity – Landscape Level

Design of this result and strategy considered guidance from relevant literature, including FRPA General Bulletins (#8, #15), FREP extension notes (#6, #7 & #20) and reports (#10 & #17), Technical Reports (“Wildlife Tree Retention: Management Guidance” (2006); “Provincial Wildlife Tree Policy and Management Recommendations” (2000)), and Forest Practice Board Reports (Biodiversity Conservation during salvage logging in the Central Interior of BC (2009)).

5.2.4.1 Maximum Cutblock Size and Harvesting Adjacent to another Cutblock

The default practice requirements sections 64(1) and 65(2) of the *FPPR* have been adopted as a result/strategy for Wildlife and Biodiversity – Landscape Level.

Patch size analysis by NDT type (as per the Biodiversity Guidebook outlining target standards by unit) has been completed for the Lillooet TSA. This analysis shows a deficit of larger disturbance areas in certain landscape units. As a result, larger patch sizes – beyond the *FPPR* maximum – may be developed within certain units in the TSA.

Adjacency and size, in certain cases, may be managed for under a DM exemption if specific sections of 64(2)(3)(4) of the *FPPR* cannot be met, as they still apply as default.

5.2.5 Wildlife and Biodiversity – Stand Level

The Result has essentially adopted the practice requirements of section 66 and 67 of the *FPPR* with the following differences:

- (a) paragraph 5.2.5.2 & 3 Result replacing section 66:
 - (i) rather than use **Cutblocks** harvested in any fiscal calendar year this result uses all **Cutblocks** belonging to **CPs** issued in each calendar year;
 - (ii) the total WTR will be a minimum of 7% of the total Gross Block Area of all **Cutblocks** in the **CPs** issued and will be a minimum of 3.5% for single **Cutblocks** > 2 ha.

Gross Block Area has been defined as the sum of the ‘net area to be reforested’ (NAR) and the ‘area occupied by permanent access structures’. This comes from discussions at the **FSP** committee meetings, and specifically directions from district staff. In short, we do not include internal WTP’s in the area as that would be ‘double counting.’ Also, we do not include swamps and NP ground, but do include permanent road even if it is pre-existing; thus, the area we have used is the sum of (NAR + permanent road area).

The **FSP** identifies a block level commitment and a commitment over an annual harvest. This is aligned with the **FPPR**. Based on written comments received as well as those received from the **MFLNRORD** for the Merritt **FSP**, we have decreased the minimum block size requiring WTR from 5ha to 2 ha. There is no obligation for WTR on blocks less than 2 ha. This was done in recognition of:

- (a) while there is no obligation to assign WTR to these small blocks, the obligation on the annual harvest will include the blocks less than 2 ha;
- (b) the block level WTR obligation resulting from small **Cutblocks** would result in very small WTP’s, which may be more difficult to manage; may be overly fragmented; and may not be located in the best potential sites. In many cases, single tree and dispersed retention (i.e. Douglas Fir stems > 65cm diameter, and avoiding all Aspen, White Bark Pine and Ponderosa Pine) is standard practice which contributes to WTR in all sizes of **Cutblocks**;
- (c) Under the WTR: Management Guide Draft, dated May 2004, a mappable polygon was considered to be greater than 0.25 ha. As these need to be tracked over time, anything smaller was considered to be at risk of being lost;
- (d) Aspen Planers mapping system is restricted to mappable occurrences of 0.1ha or greater, which has the effect of over achieving on WTR requirements on very small blocks;
- (e) Currently, MRVA reporting (December 2013) states that licensees have over achieved in regards to WTR, and have achieved higher levels (18.5% average) than the district targets. This level was attained regardless of the current Lillooet **FSP** requiring 0% retention.

Paragraph 5.2.5.4 Result replacing section 67:

- (a) Additions to this result include a replacement strategy for when WTR is harvested;
- (b) whereas section 67 has been exempted, through a conditional exemption section 12.5(2) the exemption section 91(2) no longer applies since it is specific to section 67. Section 91(2) only would apply to **FSP** holders who adopted section 67;
- (c) we believe the intent of the conditional exemption would allow and likely there is an expectation to include similar language in the replacement piece. This has been done in the writing of this result.

- (d) Based on comments received from the P'egp'ig'lha Council, about ever harvesting WTR, due to the potential for that WTR to protect underlying values, Aspen Planers has added a requirement to ensure those values are considered and managed appropriately, under Paragraph 5.2.5.4 (c) (i);
- (e) Upon discussions with **MFLNRORD** staff, a section was added to ensure communication and agreement with another Licensee, if the harvest involves their WTR.
- (f) This result was designed using guidance found in FRPA General Bulletin #15.

5.2.6 Cultural Heritage Resources

The result and strategy commits to communication with potentially affected First Nations and/or Tribal Council(s). The intent of this result and strategy is to maintain the status quo in regards to our relationships and processes with First Nations and/or Tribal Council(s). The intent is to also follow any specific agreements that the **FSP** holder has with any **First Nation Band** or Tribal Council.

The potentially affected **FNs** are now defined by the Consultative Areas Database and also include those who have directly expressed an interest to the **FSP** Holder.

There is also a commitment to follow a **CHR Evaluation Protocol**, which is a signed agreement between the **FSP** Holder and the **FN**.

In the absence of a formal protocol, there is a process that outlines how to identify where a **CHR Evaluation** is recommended.

Based on written comments received, Aspen Planers had added that who is hired to conduct a **CHR Evaluation** may be mutually selected;

There is a commitment to, jointly with the First Nation Band, create a **CHR Mitigation Strategy**, based on the above **CHR Evaluations**.

There is also a process to deal with disagreements or unclear advice in regards to the recommendations and strategies chosen.

Community-specific commitments, following St'at'imc-specific protocols and agreements, have been established outside the framework of the **FSP** that include management of high-value project aspects cultural heritage resources, wildlife, access management and water (to name a few).

Based on written comments received, a 60-day referral period was added to allow the affected First Nations time to adequately review and respond.

5.2.7 Water in Community Watersheds

This Strategy requires a *Community Watershed Assessment* to be done by a *QP* prior to carrying out timber harvesting or road construction and that all primary forest activities are conducted consistent with the assessment.

Based on written comments received, Aspen Planers specified that *Community Watershed Assessments* would be conducted by a *QP*, for clarity.

It is normal practice to communicate with the licensed water user community that may be affected, where applicable as part of an annual referral process.

Alternatively, if feedback or concerns are received, then extended dialogue may occur as necessary.

In watersheds (designated or not) that have a high likelihood of water being used for public consumption, hydrologic assessment is completed and recommendations followed.

5.3 Other Designations and Objectives Established or Continued under FRPA

5.3.1 Scenic Areas with Established VQO's

The proposed result and strategy addresses the various established *Visual Quality Objectives*, as established by the Cascades Forest District Manager, and as defined by section 1.1 of the Forest Planning and Practices Regulation.

This result commits to being consistent with the *VQO*, at the completion of harvesting and/or road construction.

Under Paragraph 5.3.1.3, an alternative result and strategy is subject to an exemption by the Minister under *FPPR* sec 12(7) and any conditions imposed. The alternative result and strategy outlines measures to ensure the extent of alteration is bounded and considers all of the design elements of the *VQO*.

Based on comments received, and to make the result and strategy more readable, Aspen Planers added definitions from the *FPPR* for both *Altered Forest Landscape* and *Categories of Visually Altered Forest Landscape*.

5.3.2 Scenic Areas without Established VQO's

Scenic areas in the TSA will be managed to the applicable *Visual Sensitivity Class* (in lieu of *Visual Quality Objective*) and, where applicable, to the same standards of practice as areas with established objectives.

Based on comments received, and to make the result and strategy more readable, Aspen Planers added definitions from the *FPPR* for both *Altered Forest Landscape* and *Categories of Visually Altered Forest Landscape*.

5.3.3 Interpretive forest site, recreation site or recreation trails – without objectives

When managing within interpretive forest sites, recreation sites and/or recreation trails, the licensee will not only seek DM Section 16 Authorization to Use, but will employ best management practices as outlined as a minimum to ensure protection of the recreation resource.

In terms of written comments received regarding non-established recreation sites and trails, the following was included in the response, added here for further clarity:

As a result of other local community governance relationships, Aspen Planers has chosen to omit any digital reference to non-legally established sites and trails at this time. AP is committed to taking reasonable efforts to work with trail associations and local governments who are in the process of legally establishing trails or sites. In concert with other Tenure Holders that require an FSP in the TSA, Aspen has to be very careful about non-legally established trails since other legally established government objectives may be contravened by non-legal trails. In this FSP, there is an increased commitment over previous plans to consider and protect legally established recreation features.

6. Stocking Standards

The currently approved standards have been incorporated into the draft replacement *FSP*.

New standards as developed by Licensees and *MFLNRO* will be amended into the *FSP* at a later date, once completed.

7. Measures to Prevent the Introduction or Spread of Invasive Plants

Measures are identified in the plan.

- (a) **Risk:** Under our *FSP* and the *FPPR* s. 40, we have two different obligations to apply seed to address two different values. The *FSP* obliges applying seed, where it is likely that an invasive plant will be introduced or spread. Section 40 of the *FPPR* requires revegetation of a constructed or deactivated road if it reasonable to foresee that erosion would cause sediment to enter a stream.

Because of the complexity of managing two similar but different obligations, in practice we will manage the two issues with a single, broad, overarching practice that accommodates both. This will mean that our practices will need to:

- (i) apply to a broad enough area to address both invasive plants and erosion potential into streams (or other s.149(1) objectives);
 - (ii) include sufficient rigor and monitoring to ensure sufficient catch (i.e. revegetation) required under s. 40; and
 - (iii) include sufficient rigor and monitoring to ensure the catch has occurred within the timelines required under s. 40 (2 years).
- (b) Likely: Section 17 of the **FPPR** requires that a measure be specified if the introduction or spread is likely to be the result of the person's forest practices. If the spread is not likely, then a measure is not required.

The “FRPA Administration Bulletin Number 3: Interpretative Guidance Respecting Forest Stewardship Plan Questions” addresses the question of ‘Likely’. It identifies the following factors in determining likelihood:

- (i) are there or has there ever been a history of a particular species of invasive plant growing within the **FDU**;
- (ii) is it likely that any of the identified invasive plants would survive or spread if seed was introduced to an area within an identified **FDU**;
- (iii) if the harvesting is largely limited to winter operations, is it likely that seed could be introduced by the harvesting or that conditions would be created for seed establishment in the summer.

Based on this, an assessment of ‘likely’, under the FSP, will take into consideration aspects such as:

- (i) presence or absence of invasive plants;
- (ii) abundance of invasive plants;
- (iii) proximity of invasive plant species to operations;
- (iv) preferred habitat of the plant species, compared to site conditions such as:
 - (A) the elevation;
 - (B) biogeoclimatic zone, subzone and variant;
 - (C) moisture regime; and

(D) aspect;

(v) season of operations.

At this point, we do not have a reliable tool to implement to determine ‘likely’, and until such time as a reliable tool exists, grass seeding will be applied broadly.

Here are some of the changes over the initial **FSP** Measures:

- (i) the High Hazard Invasive Plants (HHIP) list has been derived from consultation with the three Invasive Plant Committees within the district;
- (ii) There are two new measures in regards to these High Hazard Invasive Plants – there has been a commitment made for training of personnel and for identification and reporting. Based on comments received, the timeline for reporting was decreased from 90 days to 30 days.
- (iii) the seeding of exposed mineral soil exceeding 0.1 contiguous ha within **Cutblocks** for other than permanent structures has been expanded to cover all invasive plants and not just the HHIPs;
- (iv) the commitment to reseed has been set at <10% cover and is limited within an Invasive Plant zone;
- (v) the inspection and cleaning of equipment has been broadened to include all Invasive Plants rather than just the HHIPs. Inspection frequency, timing and cleaning are outlined as part of the Aspen SFM/EMS management program; and
- (vi) inspection results for grass catch are documented on road inspections and grass catch successes are tracked in Phoenix.

As per section 7.5 of the **FSP** (Timing and Seed Quality) - Target 90% seeded areas prior to July 1st - as per the flexibility in percentage of areas seeded by July 1st is required to allow for instances where operational constraints (seasonal) may prevent 100% of the grass seeding area to be completed by July 1st of the immediately following calendar year, but the commitment remains to achieve 100% grass seeding, nonetheless, prior to December 31st of the immediately following calendar year.

Based on comments received, we have included that the Common #1 Forage Mixture to be applied will be without white clover, to help reduce the attraction of Grizzly Bears to newly seeded areas and to reduce risk of human interaction/conflict.

8. Measures to Mitigate the Effect of Removing or Rendering Ineffective Natural Range Barriers

Some highlights are:

- (a) mitigative actions and strategies are defined to include subject to Ministry standards and approval and also ensured they are measurable in regards to who, what, where, when;
- (b) measures include a commitment to refer on an annual basis, the location of new harvest and road building activities, and request from the range agreement holder, the location of NRBs that may be affected, and to conduct activities consistent with the NRB Mitigation Strategy;
- (c) also included is a commitment to refer to the *MFLNRORD* where the range tenure is not currently assigned.

9. Notice, Review and Comment

9.1 Advertisement

- (a) As per section 22(2)(a) of the *FPPR*, the following are a copies of the notices published under section 20 of the *FPPR*. Notices were advertised in the Lillooet News on August 2nd, 2017.



Aspen Planers Ltd. – Lillooet Division Forest Stewardship Plan

Aspen Planers Ltd replacement forest stewardship plan (FSP) for the Lillooet Timber Supply Area is available for public review and comment between August 2nd and October 3rd, 2017.

The FSP outlines the results, strategies or measures that Aspen Planers must achieve in order to be consistent with government objectives for forest values including: timber, biodiversity, cultural heritage resources, visual quality and recreation resources.

This plan is publicly available for review and for written comment. Those wishing to review this plan may do so by appointment, during normal working hours at the Lillooet Woodlands office located at 530 Main Street, Lillooet BC, as well as the Merritt Woodlands office at 1375 Houston Street, Merritt, BC. To make an appointment to review the plan, please telephone (250) 315-4250 or (250) 315-4218.

Alternately, the plan can be viewed online at: <http://aspenplaners.ca/sustainability/>

Written comments may be mailed, faxed, or emailed to Brent Turmel, R.P.F., Planning Forester, Aspen Planers Ltd, PO Box 160, Merritt B.C. V1K 1B8, Tel: 250 315-4218; Fax: 250 315-4239. Email: BrentTurmel@apgroup.ca
Written comments may also be submitted in person to the address above.

Public media advertisement, as shown in the Bridge River - Lillooet News (to run in the August 2th and August 9th, 2017 editions):

LILLOOET NEWS NEWS AUGUST 2, 2017 PAGE 3

LAFS report identifies future opportunities

Recommendations already being acted on

WINDY FRASER

A report prepared for the Lillooet Agriculture and Food Society (LAFS) identifies opportunities for growing Lillooet's agricultural sector and contributing to a resilient local economy.

The market access and growth strategy report was prepared by consultant Jane Smith from Uplands Agricultural Consulting.

The report says key features of the Lillooet area's agricultural profile include:

- ideal climate and soils
- rich historic history of fishing, hunting and foraging
- a strong ranching background for range and cattle production
- maintenance in fruit, vegetable and poultry operation
- a relatively small population of A.L.R. land in under cultivation, indicating that more land can be brought into production should the right economic conditions arise

LAFS co-ordinator Jacqui Rasmussen told the News the report makes the point that even though the area doesn't have a large population and strong features are identified in the agricultural profile, not enough food is being grown to feed all of Lillooet.

Lillooet and the surrounding areas are less than 50 km from food self-sufficient

based on the amount of land currently under cultivation.

This, combined with community support for purchasing local products, indicates ample room for the agricultural sector to expand in terms of production to meet local food needs. However, due to the overall lack of population growth within the community and competition from less expensive products, it makes good business sense for local producers to explore sales opportunities in markets such as the Sea-to-Sky corridor, the Lower Mainland and Nanaimo.

Having said that, Rasmussen added that Bay-Loe Foods and the Country Store, specifically Bob Shannon and Ed Nichol, have supported local producers' efforts for years to sell their produce locally and beyond Lillooet.

The report contains 30 recommendations, six of them are already in some of implementation, the LAFS team or other organizations are now working on them.

Recommendation #4 is for an abiotic feasibility study. A grant application for the study was submitted to the provincial Rural Divided fund this spring.

Recommendation #5 is for an inventory of the chain in the Sea-to-Sky corridor. The inventory is being developed this winter with the goal of eventually having chain of title to this area to react with local producers.

Recommendation #7: Farmers from our region are going to offer farmers markets in locations such as Whistler and Vancouver.

Recommendations #8-10: There are many small micro-food hubs currently in operation: growing grapes, hops and garlic. The online food-hub concept is top of LAFS priority list to explore and support the micro-hubs that are currently in operation. The capacity of producers and farmers to add their product information onto the online hub format is the biggest challenge.

The idea of a food locker to operate this hub is included in the report and would help address this challenge. Tript has received funding from the SIRD to build a cold storage facility for a garlic hub, which will be made available for other producers.

Developing a "brick and mortar" food hub is a long-term goal identified in the report. "This warehousing and retail facility would solve many of the challenges currently being felt by the local agriculture community," the report states. "However it would require a solid business plan and would likely be successful through a 'build it and they will come' scenario."



One of the cows in the herd of Iggy Creek Ranch on Nees Creek flood. Photo Credit: Spring Creek Ranch

Cisterns going in at two key locations

WINDY FRASER

Fire Chief Darro Oles says the District of Lillooet has adapted several generative measures for this year's fire season.

Speaking at a July 19 public information meeting on the wildfire situation, the Fire Chief said at the time of his last budget, District Council accepted his recommendations to use cisterns at local town and town. He said two large holding tanks would be installed in the next week or two. One is a 10,000 gallon water tank located on the District industrial park in East Lillooet.

"This allows us to have a store of water for our fire services to draw upon," said Oles. He added that it can take up to 8,000 gallons of water to extinguish a fire in a "fully involved" house.

A second 12,000-gallon holding tank is being installed at the Lillooet Airport, again on municipal property.

"This week, we secured an agreement on Cook Road," Oles continued. "It's an area of high concern to ourselves and R.C. Wildfire because it's a classic interface area." He said a 5,000 gallon roadside supply will sit there (Cook Road) until the end of the season.

Chief Oles also commented on the prescribed burn carried out this past spring by the municipality in partnership with the R.C. Wildfire Service.

Acknowledging that some concerns were expressed about the smoke generated by the prescribed burns, he said he wanted to see the program "become a normal event. We can publicize so there are less health hazards, but this is a real problem and we need to look at it and consider burns in our parks and lands."

He added that unfortunately, however, this small amount made the grasses grow more quickly and in greater position.

The chief said he would continue to talk to property owners in various neighborhoods and even of the community about how they can FireSmart their property. He added that the Department has sprinkler protection kits that can be deployed to help identify and protect homes if a wildfire is encroaching.

 **Aspen Planers Ltd. - Lillooet Division Forest Stewardship Plan**

Aspen Planers Ltd replacement forest stewardship plan (FSP) for the Lillooet Timber Supply Area is available for public review and comment between August 2nd and October 3rd, 2017.

The FSP outlines the results, strategies or measures that Aspen Planers must achieve in order to be consistent with government objectives for forest values including: timber, biodiversity, cultural heritage resources, visual quality and recreation resources.

This plan is publicly available for review and for written comment. Those wishing to review this plan may do so by appointment, during normal working hours at the Lillooet Woodlands office located at 539 Main Street, Lillooet BC, as well as the Merritt Woodlands office at 1375 Houston Street, Merritt, BC. To make an appointment to review the plan, please telephone (250) 315-4250 or (250) 315-4218.

Alternatively, the plan can be viewed online at: <http://aspenplaners.ca/resources/>

Written comments may be mailed, faxed, or emailed to Brent Tarnal, R.P.F., Planning Forester, Aspen Planers Ltd., PO Box 160, Merritt B.C. V1K 1B8, Tel: 250 315-4218; Fax: 250 315-4239. Email: Brent.Tarnal@apgroup.ca

Written comments may also be submitted in person to the address above.

NOTICE TO READERS AND ADVERTISERS

In order to accommodate staff holidays The Lillooet News will be closing for two weeks in August.

The News will not be published on August 9th and 16th.

All subscriptions will be extended accordingly.

Our office will be closed from Thursday, August 3rd to Wednesday, August 15th.

Regular office hours will resume on Thursday, August 17th.

Thank you for your continued support.

Bridge River
Lillooet News
www.lillooetnews.net

The following is an example of the FSP referral letter, dated July 25, 2017, was sent to 121 parties inviting participation in this process – see appendix B for referral list (2 pages):



July 25, 2017

Address:

Attention:

Re: Aspen Planers New Forest Stewardship Plan

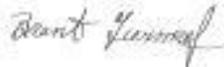
Aspen Planers Ltd. replacement forest stewardship plan (FSP) for the Lillooet Timber Supply Area will be available for public review and comment starting August 2, 2017 and can be found using the following Link:
<http://aspenplaners.ca/sustainability/>

This is a new FSP that replaces the current FSP that was developed in 2007. The FSP outlines the results, strategies or measures that Aspen Planers must achieve in order to be consistent with government objectives for forest values including: timber, biodiversity, cultural heritage resources, visual quality and recreation resources.

Aspen Planers Ltd. requests a meeting at your earliest convenience to discuss this FSP and the referral process. We are planning on submitting the FSP for approval within the next few months and would appreciate your input prior to submission. Please call our office during normal working hours to set up an appointment.

I have attached a summary of key new Results & Strategies to the new FSP that are based on updated "Best Management Practices" and/or new Government Action Regulations (GAR Orders) that are a significant improvement over the original FSP.

Sincerely,



Brent Turmel, RPF
Planning Forester
Aspen Planers Ltd.
(D) 250-315-4218
Email: brentturmel@agroup.ca

Attachment: Summary of New FSP Results & Strategies



A forest stewardship plan (FSP) must be prepared by all Major License (ML) holders under the Forest Act.

The FSP has a term of five years and may be renewed for an additional term. It contains a description of the forest development units where harvesting and road building may occur and must specify results or strategies that describe how a ML holder will meet the objectives set by government for the 11 resource values of: Soils, Timber, Wildlife, Water, Fish, Biodiversity, Visual Quality, Cultural Heritage, Recreation, Invasive Plants and Natural Range Barriers. The provincial government must approve an FSP before associated permits can be issued to the agreement holder. Review and Comment FSPs must be made publicly available for review and comment. A licensee must advertise that the plan is available and allow at least 60 days for comments to be received. This process allows other tenure holders, professionals, communities, stakeholders, and the public to provide input on these plans. FSPs must also be shared and discussed with affected First Nations as part of the licensee's obligation to consultation.

- [Get Involved in FSP Review \(PDF\)](#)

Summary of Aspen Planers Ltd. New FSP Results & Strategies:

- 1) **Old Growth Management Area (OGMA)** – No Change - Commitment to follow Non-spatial OGMA order and Lillooet TSA Committee OGMA replacement process.
- 2) **Soils** – Increased commitments for Rehabilitation where it is necessary.
- 3) **Wildlife** – Mule Deer, Bighorn Sheep & Elk are covered under the current a Draft Government Actions Regulation (GAR) Order. Grizzly Bear & Goat are covered off under established Wildlife Habitat Areas (WHA's). Addition commitments and best management practices have been incorporated for Mule Deer, Moose, Coastal Tailed Frog, Gopher Snake and Spotted Bat.
- 4) **Water, Fish, Wildlife & Biodiversity within Riparian Management Areas** – Significant commitment in all of the Riparian Categories for increased Basal Area Retention (or Reserve) within a stream or wetland Riparian Management Zones.
- 5) **Wildlife and Biodiversity – Landscape Level** – No Change
- 6) **Wildlife and Biodiversity – Stand Level** – Increased commitment for Wildlife Tree Retention (WTR) to 7.0% for all Biogeoclimatic Ecosystem Classification (BEC) zones.
- 7) **Cultural Heritage** – Enhanced to be consistent with any Cultural Heritage Resource (CHR) Protocol established with a First Nation Group and commitment provide information (may be protocol specific) prior to any road building or harvesting activities and conduct an CHR Evaluation and follow the recommendations of the CHR Evaluation.
- 8) **Water in Community Watersheds** – Increased commitment to conduct Community Watershed Assessments based on all levels of activity within a Community Watershed.
- 9) **Scenic Areas "Visual Quality"** – More defined alternate results & strategies in scenic areas where forest health factors are to be addressed and commitment to seek a District Manager Amendment to conduct forest management in Scenic Areas for Forest Health factors.
- 10) **Recreation** – Increase commitment and best management practices for operations that proposed within a recreation site or trail.
- 11) **Invasive Plants** – Significant increased commitment for grass seeding, reporting, education and training.
- 12) **Natural Range Barriers** - Significant increased commitment for management and use of best management practices for Natural Range Barriers.

9.2 Copies of Written Comments Received

As per section 22(2)(b) of the *FPPR*, written comments received under section 21 of the *FPPR* are outlined in Appendix A of this document.

9.3 Description of Changes Made to the Plan as a Result of Comments

FPPR section 22(2)(c) description of changes made to Aspen Planers Ltd. Lillooet TSA Forest Stewardship Plan (*FSP*), as advertised on August 2, 2017, as a result of comments received under section 21.

Following are the descriptions of the changes made to the FSP Paragraphs listed below:

Interpretation:

- 1.1 Definitions – under the first line, deleted “or the context requires”
- 1.2 Definition from legislation - deleted “or the context requires”
- 1.9 No prohibition on activities.... - deleted Paragraph.
- 1.10 (is now 1.9) Conditional exemptions – added text to bottom of table to clarify that all other sections of the FPPR apply. Several of the written comments received indicated that they believed Aspen Planers had omitted sections because they were not adopted.

Old Growth Order:

- 5.1.1 – expanded on the description in the objective section.
- 5.1.1.3(c) – added less than 10% to satisfy “no material adverse impact” request.
- 5.1.1.3(d)(ii) – changed identification of replacement OGMA from “prior to reporting harvesting completion” to “prior to harvest commencement”.
- 5.1.1.3(d)(ii)(A) – changed “similar size” to “equal or greater than”.
- 5.1.1.3(d)(ii)(C)(II) – changed the reference to “section 6 of the order” to a description in general terms of what the section 6 of the order says. As this was done to make it more readable we also changed 5.1.1.3(d)(ii)(c)(I) that referenced section 2 of the order.

Soils:

- 5.2.1.3(b)(i) – changed to restrict the use of “Temporary Access Allowance” only to non-sensitive soils.

Wildlife:

- 5.2.2.1.1 – adjusted the definition of “Moose Management Units” to clarify their attributes. Also, a Moose Management Unit layer has been added to the FSP maps.
- 5.2.2.1.2(c) – changed to allow retention of forage while achieving free growing status (not one value over another).
- 5.2.2.2.1, 5.2.2.4.1 and 5.2.2.5.1 – Definitions of an occurrence site – added locations provided by the MFLNRORD prior to planning and layout of a cutblock or road.
- 5.2.2.6.1 – changed the strategy to recognize the Proposed General Wildlife Measures for Grizzly Bears in the Lillooet TSA and once approved the Grizzly Bear GAR Order will replace this strategy.

Retention in RMZ:

5.2.3.3 (was 5.2.3.4) – defined “Sanitation Treatment” as requested in a comment. Also, the alternative strategies were incorporated into one strategy similar to Merritt FSP. Under the old Paragraph 5.2.3.4 (d), changed to “Damaged Timber” versus what was there originally.

Wildlife and Biodiversity – Stand Level:

5.2.5.3 – minimum block size from 5 hectares was changed to 2 ha. This was based on concerns about not having any WTR on small salvage blocks as written in the original rationale document.

5.2.5.4 –in regards to WTR replacement, added Subparagraph (c) (i) prior to harvest, will ensure that all underlying values or commitments in regards to the WTR are considered and managed for appropriately.

Cultural Heritage Resources:

5.2.6.2 (b)(i) – changed by adding “at least 60 days referral prior to CP/RP submission”.

5.2.6.2(b)(ii) – changed by adding “ may be mutually selected” in regards to who is hired to conduct the CHR evaluation.

Community Watersheds:

5.2.7.1 – added that a Community Watershed Assessment will be completed by a “QP”.

Scenic Areas:

5.3.1 and 5.3.2 – deleted the alternative sections 5.3.1.3 and 5.3.2.3 and added definitions for “Altered Forest Landscape” and “Categories of Visually Altered Forest Landscape”. These were requested to make the Result and Strategy more readable to the public.

Invasive Plants:

7.3 – changed 90 days to 30 days.

7.5 – added that the seed mixture will be “less White Clover”.

9.4 Efforts to Meet with First Nation Groups Affected by the Plan

As per section 22(2)(d) of the FPPR, below is a description of efforts made to comply with the requirements of 21(1)(d):

Prior to advertisement of the draft *FSP* (August 2, 2017), correspondence (phone and email follow up) was conducted with all Lillooet TSA core First Nations to request meeting and discussion regarding the draft *FSP*. Appendix B outlines efforts made to meet with First Nations groups affected by the plan to discuss the plan.

At the time of original referral (July 25, 2017) of this FSP and subsequent advertisement to the public (August 2, 2017), Aspen Planers Ltd. was aware of a joint decision making framework (in development) between the Nlaka’pamux Nation Tribal Council (NNTC) and the Provincial Government. Regardless, all reasonable efforts were made to contact, meet and to provide all relevant information regarding this FSP to the NNTC and the member bands (Boothroyd, Lytton, Boston Bar, Oregon Jack Creek, Skuppah, and Spuzzum) as part of the development of this plan.

9.5 Summary of Stakeholders Contacted (Other than First Nations) Affected by the Plan

Below is a description of efforts made to comply with the requirements of 21(1)(c):

Prior to advertisement of the draft FSP (August 2nd, 2017), correspondence was conducted with all Lillooet TSA stakeholders during the week of July 27th to request meeting and discussion regarding the draft FSP, as listed in Appendix C.