

NSC 2016 Winter Conference:

Improving silviculture planning and practice from current standards to our future forests

February 16-17, 2016

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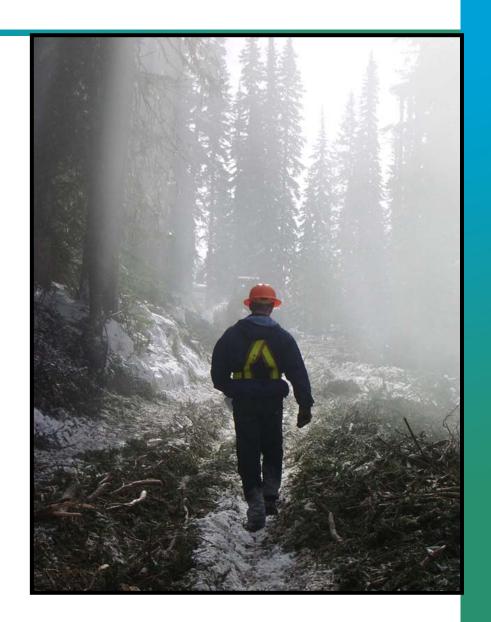
KEY FINDINGS AND RECOMMENDATIONS: FPB FOREST STEWARDSHIP PLAN STUDY

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Presented at NSC, February 16/17, 2016

Where will we go?

- 1. Forest Practices Board
- 2. FSP Report
 - Methods
 - Key Findings
 - Examples
 - Recommendations





Forest Practices Board

Mission: To serve the public interest as the independent watchdog for sound forest and range practices in British Columbia.





Forest Practices Board

Must do:

- Audits
- Complaint Investigations

May do:

- Special Investigations
- Special Reports
- Appeals

www.bcfpb.ca





Forest Practices Board Report



Forest Stewardship Plans: Are They Meeting Expectations?

Special Investigation

FPB/SIR/44

August 2015



Forest Practices Board Report

Methods:

- 1.Examined random sample
 - 43 of 290 FSPs (15%)

2.Interviewed

- Plan preparers and users
- Plan reviewers and approvers
- Other resource users



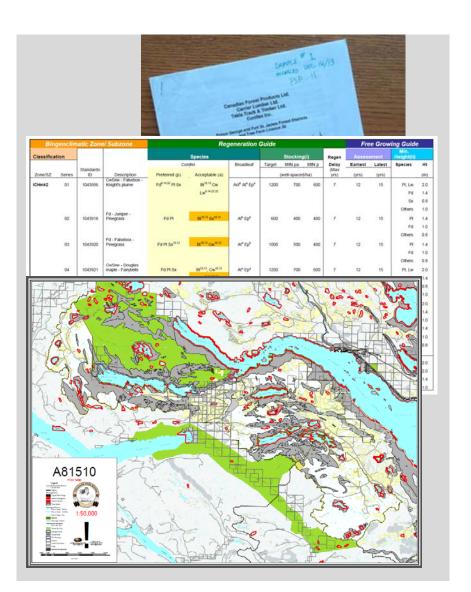
Forest Practices Board Report

Questions relating to:

- 1.Content requirements
- 2. Public review and comment
- 3. Enforceability
- 4. Consistent with government's objectives
- 5.Innovation
- 6.Are FSPs getting better?



Key Finding: Content



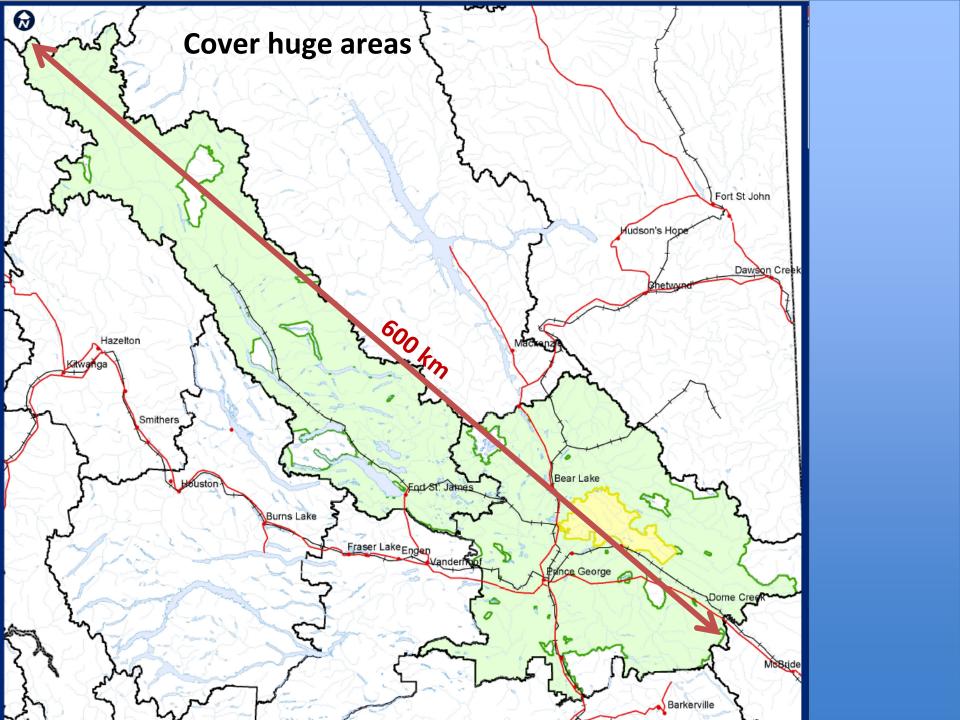
Do FSPs meet content requirement?

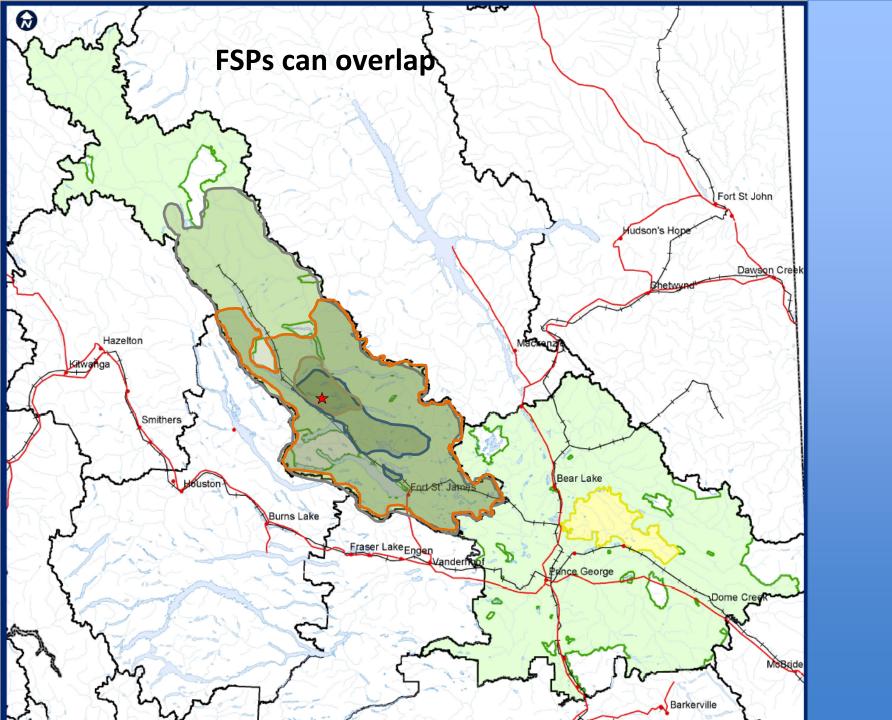
Yes, almost all do

Are FSP's useful as tools for public review and comment?

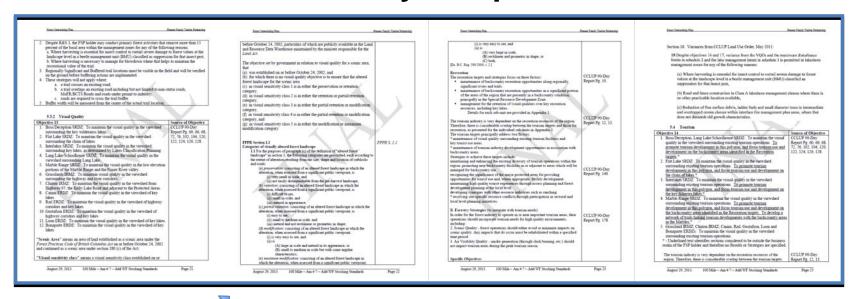
- •FSPs are meeting the legal requirements
- •But...







Sometimes unnecessarily complex



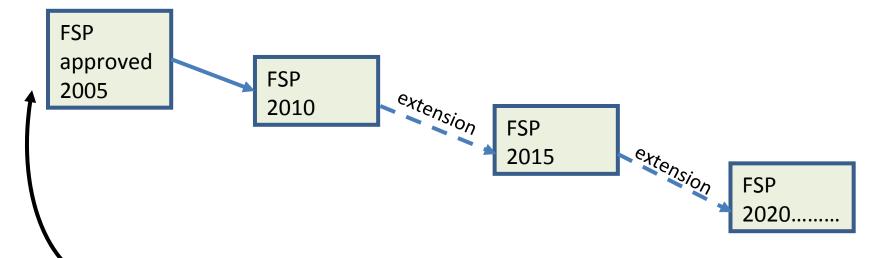
Example 1: over 3 pages and 1500 words

Example 2: 36 words



The holder of the plan will not carry out or authorize timber harvesting or road construction in a scenic area unless the cutblock or road is consistent with the visual quality objective applicable to the area.

Long time between opportunities for public review and comment



Full public review and comment only available here

Public review and comment not required for FSP extensions



People like to see and comment on cutblocks and



Because they

- Cover large overlapping areas,
- Are difficult for public to understand,
- •Do not provide a reasonable time period between review opportunities, and
- Have no block or road-specific information,

They are ineffective as tools for public review and comment

Many licensees have created their own processes for public review and comment!



Key Finding: Enforceability

- Are results, strategies and measures measurable and verifiable and therefore enforceable?
- The enforceability of FSPs is a key part of FRPA
- Board found:
 - Many FSPs use imprecise or indefinite words (may, if necessary, reasonable efforts...)
 - Many do not specify who will do something or when it will be carried out...
- So, a high proportion of results strategies and measures are not enforceable



Key Finding: Consistent

- Are results and strategies consistent 'to the extent practicable' with objectives? and...
- Are measures reasonable and appropriate?
- The Board found:
 - Some FSPs have exceptions built into r/s that go beyond "extent practicable"
 - Some are written so that consistency cannot be reliably determined
- A high proportion are not



Examples

...the FSP Holder will design its cutblocks and roads .. so that, when assessed from significant public viewpoints relevant to the scenic area, the altered forest landscape is consistent with the established Visual Quality Objectives.

...harvest cutblocks and build roads...



Examples

- "The holders of this FSP will, according to the principles of professional reliance, consider incorporating a variety of opening sizes and shapes and non linear boundaries in the design of cut blocks within 8 kilometres of the designated viewpoints."
- "If the Holder of this FSP harvests a cutblock, the Holder will do so not harvesting <u>some</u> structural forest attributes..."



Examples

WTRAs kept...

"except under the following situations where harvesting may occur:

- 1.it is necessary to fell and remove danger trees that represent a **safety hazard** to adjacent primary forest activities as defined in Part 1 of FPPR,
- 2.an **access structure** as defined in Part 1 of FPPR is required to provide access to a block,
- 3.a wildlife tree retention area or wildlife trees as defined in the FPPR are rendered ineffective by wind, fire, insects, disease or another damaging agent
- 4.it is necessary for guyline tiebacks, or cable yarding tailholds, tiebacks and backspar trees,
- 5.carrying out a **sanitation** treatment."

an access structure as defined in Part 1 of FPPR is required to provide access to a cutblock and there is no practicable alternative route



Key Finding: Innovation

- Are FSPs being used to facilitate innovation?
- Yes, but not very much
- Some licensees felt that it is too difficult to get an innovative result strategy or measure approved
- Reviewers felt that some proposals for innovation would put achievement of governments objectives at risk

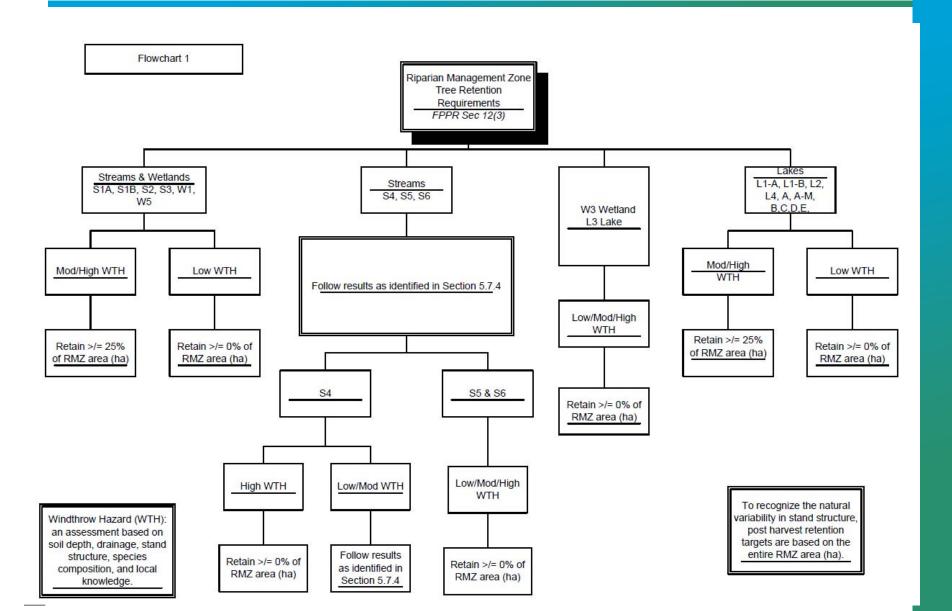


Innovation—examples

- ...beginning on April 1 of any calendar year, the holder must ensure that, at the end of that 12 month period, the total area covered by wildlife tree retention areas that relate to the cutblocks is a minimum of 7% of the total area of the cutblocks.
- ...measure the WTP retention targets referred to at the Timber Sale Licence level or Cutting Permit level



Innovation—examples



Key Finding: Improvement

Are FSPs improving?

Two aspects to this question...

- 1. Are existing FSPs being improved through amendments?
 - FSPs are not improving over time through successive amendments
- 2. Are new FSPs "better" then old ones?
 - New FSPs are not better than old ones



"Official" Recommendations

- 1. Government should not extend or approve FSPs:
 - That are not enforceable
 - With results/strategies that are not consistent
 - With measures that are not reasonable and appropriate
- 2. Government should ensure the public has at least one opportunity every 5 yrs for full review and comment
- 3. Government should establish a process for public review and comment on planned roads and cutblocks
- 4. The ABCFP should ensure that its professionals are aware of their responsibilities in creating FSPs.



What's next?

- Those were the 'official' recommendations
- Government and the ABCFP are working on them
- Training initiative being prepared for rollout in late March
- What can plan preparers do?
- Often, not much needed to improve results, strategies or measures... improve them by:
 - Writing them clearly
 - Ensuring they are consistent with government objectives
 - Ensuring they are enforceable
 - Building in flexibility and innovation



Further Information...

 The FPB report is available at: https://www.bcfpb.ca/

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Preparing your next FSP...

- Be prepared to push reset
- Training





Purpose

Key purposes of FSPs:

- Show how government's objectives will be met
- Set stocking standards
- Provide an avenue for enforcement
- Reviewing and comment opportunity



FSPs...

Include:

Results or strategies for certain government objectives

 Measures for invasive plants and natural range barriers

Maps

Consistent

Reasonable and Appropriate

Measurable or Verifiable

Satisfactory scaleand formatShow FDUs



Writing useful FSPs

Understandable...

- Concise
- •Remember that the Support Document is usually not publicly available
- Consider a version for the public



Writing useful FSPs

Innovative...

How can we innovate within FSPs?

- Create results and strategies instead of following practice requirements
- Write innovative measures
- Stocking Standards



Writing useful FSPs

Innovation...

- Not to be confused with excess flexibility
- Bumpy start for FSPs in embodying innovation
 - Licensees often felt that districts were stifling them
 - At the same time, districts sometimes felt that the innovation proposed was making the FSP less consistent with objectives
- •"Innovation" can be in simple changes that improve administration while not compromising objectives
- May need to work closely with district staff
- •Sharing of ideas would be nice!

