



Reference: 224402

OCT 17 2016

Tim Ryan, Chair
Forest Practices Board
PO Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Tim Ryan:

On behalf of the Ministry of Forests, Lands and Natural Resource Operations, please accept this letter as government's response to the Forest Practices Board's (the Board) report entitled "Visual Quality on Alberni Inlet," FPB/SIR/46 - September 2016.

We appreciate the Board's report and the thoughtful advice it has provided on ways to improve the visual resource management program. As the Board is aware through staff conversations, a program review was conducted and specific improvements to the visual program were initiated in 2015/16 that addresses many of your recommendations.

Nonetheless, your report has been provided to the provincial visual quality program to assist with the refinement of program improvements. The report has also been received by the Director, Compliance and Enforcement Branch (CEB), as a formal complaint. Through their authorities, they will evaluate this issue and determine what subsequent actions are warranted. As a result of the ministry's earlier program review, and ongoing *Forest and Range Practices Act* (FRPA) implementation improvement discussions, ministry staff are looking into how the district, visual program representatives and CEB could adjust communications to ensure that potential issues with visual management can be better identified internally.

Board's Recommendations (3)

1. Government evaluate its approach to management of visual resources. This evaluation should involve not only the forest sector, but also those business sectors reliant on visual resources for their success. The evaluation should include consideration of ways to improve the clarity and enforceability of the existing regulatory framework, including consideration of making visual resource management a practice requirement for all licensees, consistent with the Woodlot Licence Planning and Practices Regulation.

As your staff are aware, an initial program review was conducted in 2015. This work resulted in some priority actions regarding the clarity and enforceability of visual resource management. This work included review and recommendations for potential regulatory

Page 1 of 3

improvements as part of the FRPA continuous improvement. A deeper review of the visuals program is currently underway that, in conjunction with your report, will inform the next round of program improvements. While the Board's mandate is limited to forestry, the ministry's work supports all the natural resource economic sectors, of which tourism is an important provincial priority. Tourism is a core consideration in the design and implementation of the provincial visual resource program.

While a number of improvements are underway, I would like to provide some tangible examples of improvements to the visual resource program in 2015/16, which include, but are not limited to:

- Minister and Chief Forester direction on the inclusion of the range of resource values, explicitly citing visuals, in Forest Stewardship Planning (FSP);
- Provincial training on appropriate legal language expected for visual management in FSPs;
- Regional staff technical training to increase the awareness and ministry capacity to evaluate visual resource management practices;
- Enhanced monitoring of visual resources under the Forest and Range Evaluation Program ;
- Initial review of the regulatory framework to identify problems and potential solutions. An example of this is different regulations referencing landform versus landscape.

2. Government and the Association of BC Forest Professionals (ABCFP) review and update guidance and policy documents to ensure consistency of approach and use of best practices in the management of visual resources.

As part of the above noted program review, the ministry is committed to updating guidance and policy documents regarding visual resource management. This work is well-underway and we plan to release updated guidance this fiscal year. We will also continue to collaborate with the ABCFP on this work.

3. Government ensure that compliance with, and enforcement of, visual quality objectives is a consistent priority across the province.

Visual resource management is one of the 11 legal FRPA values, and as such, continues to be a priority to the province and the programs that support it.

Internal work is underway to improve understanding of the management expectations for visuals, and all FRPA values, across a number of ministry work units, including CEB and ministry district operations. In addition, CEB is working directly with Resource Practices Branch to improve the clarity of the regulatory framework, which will support enforcement activities. This work is likely to come forward in the near future as a bulletin under FRPA.

I expect that the recent Forest Appeals Commission (FAC) ruling noted in your report will also contribute to the importance of visual resource management by licensees. The FAC rendered a detailed and informative ruling on the management of visual resources that

Tim Ryan, Chair

provides additional clarity to our legislative framework. The ministry will closely evaluate the ruling to determine what further actions can be taken as a result.

Related to this, I was pleased to see the calibre of the contribution by the ministry's visuals specialists in the recent FAC ruling. This small and effective team deserves credit for the creation and promotion of our provincial regime.

In closing, I acknowledge the work of the Forest Practices Board and staff in support of our collective goal of effective and sustainable forest management. If you would like any further information, please do not hesitate to contact Jennifer Davis, Director, Resource Practices Branch, or Kevin Edquist, Director, Compliance and Enforcement Branch.

Sincerely,



Steve Thomson
Minister

pc: Jennifer Davis, Director, Resource Practices Branch
Kevin Edquist, Director, Compliance and Enforcement Branch

February 17, 2017

Dave Clarke, RPF
Executive Director
Forest Practices Board
Box 9905 Stn Prov Govt
Victoria BC V8W 9R1

Dear Mr. Clarke:

Re: Update on Forest Practices Board Report “Visual Quality on Alberni Inlet” September 2016 (FPB/SIR/46)

Thank you for the Forest Practices Board work on Visual Resource Management in BC.

We are pleased to update you on our progress toward the recommendation that includes the ABCFP in the Forest Practices Board (FPB) report “Visual Quality on Alberni Inlet”.

Specifically, the second recommendation in the report states,

“Government and the Association of BC Forest Professionals (ABCFP) review and update guidance and policy documents to ensure consistency of approach and use of best practices in the management of visual resources.”

In response to the FPB report, the ABCFP provided a News Release September 9, 2016. In the News Release the ABCFP confirmed the important role for forest professionals in managing forested viewsapes throughout BC. In addition, the ABCFP identified professional practice guidance and a practice advisory that can be developed to assist forest professionals and employers. Both documents are still in preparation and we expect a release in 2017.

In speaking with forest professionals and employers we learned that visual resource management training is needed now, in order to support Forest Stewardship Plan development. As a result, the ABCFP has worked with government to provide the necessary information for a two day training session in several locations throughout BC. The sessions will be complete by March 31, 2016.

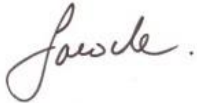
Additionally, the ABCFP worked with government to provide visual resource management examples for professionals during the FSP training of 2016. The profession has provided articles on visual resource management in the BC Forest Professional magazine and information alerts in the Increment Newsletter.

Page Two
Mr. Dave Clarke, RPF
February 17, 2017

The ABCFP will continue to work on this important area of professional practice in collaboration with our government and industry partners. The ABCFP will advise the FPB as key parts of the recommendation are completed in the coming months.

Should there be any questions or comments regarding the ABCFP work related to FSP's then please contact Mike Larock RPF Director of Professional Practice and Forest Stewardship.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larock".

Mike Larock, RPF
Director of Professional Practice and Forest
Stewardship
Association of BC Forest Professionals

Cc
Christine Gelowitz, RPF
Chief Executive Officer
Association of BC Forest Professionals



File: 97325-20/2015-13

August 30, 2017

Honourable Doug Donaldson
Minister of Forests, Range, Natural Resource Operations and Rural Development
Room 248 - Parliament Buildings
PO Box 9049, Stn Prov Govt
Victoria, BC V8V 1X4

Dear Minister Donaldson:

**Re: Government Responses to Recommendations in the Board report,
SIR46, *Visual Quality on Alberni Inlet***

In September 2016, the Forest Practices Board published a special investigation titled *Visual Quality on Alberni Inlet*. The investigation found the licensee failed to achieve the required visual quality objective (VQO) and government failed to take appropriate enforcement action. This is the fourth Board report published since 2014 that has identified issues with visual resource management. These are important scenic viewsapes clearly visible to the public that government has determined are significant for tourism and public recreation values.

The Board has found that this issue is not specific to an area of the province, a licensee or group of licensees, professionals, or government – it is systemic. The Board is concerned that stewardship of visual resources is inconsistent across the province. As a result, the Board made the following recommendations in this special investigation:

1. Government evaluate its approach to management of visual resources. This evaluation should involve not only the forest sector, but also those business sectors reliant on visual resources for their success. The evaluation should include consideration of ways to improve the clarity and enforceability of the existing regulatory framework, including consideration of making visual resource management a practice requirement for all licensees, consistent with the *Woodlot Licence Planning and Practices Regulation*.
2. Government and the Association of BC Forest Professionals (ABCFFP) review and update guidance and policy documents to ensure consistency of approach and use of best practices in the management of visual resources.
3. Government ensure that compliance with, and enforcement of, visual quality objectives is a consistent priority across the province.

Minister Donaldson

August 30, 2017

Page 2

We requested government to advise us of the steps taken to implement the recommendations by December 31, 2016.

On October 17, 2016, the Forest Practices Board received a letter from Minister Thomson describing the action plan FLNRO intended to undertake.

In regard to recommendation #1 the Minister advised the Board that a deep review of the visuals program was underway that would inform the next round of program improvements. The letter also summarized actions undertaken that include: the chief forester providing guidance for FSP preparation; legal language clarification for FSP development; regional staff technical training; enhanced FREP monitoring; and review of the regulatory framework.

In response to recommendation #2, the Minister committed to updating policy, to be released by March 31, 2017.

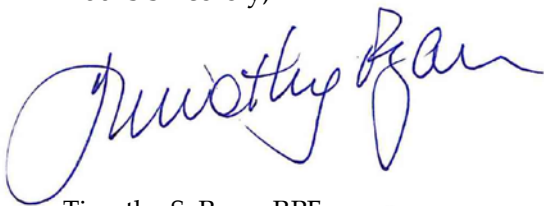
In response to recommendation #3, the Minister mentions collaboration between the Ministry's Resource Practices Branch and Compliance and Enforcement Branch to improve clarity of the regulatory framework and to support the development of a bulletin under FRPA.

We appreciate the timely response to our recommendations, however much of the response described actions that would occur within the 2016/17 fiscal year. Therefore, we decided to wait and see how the proposed actions were implemented.

Since the Minister's letter of October 2016, and eleven months since our report was published, we are disappointed that the Ministry has not carried through with these commitments to implement our recommendations. With respect, we note that these issues are not new to the Ministry, given that your staff identified many of these problems in a 2015 review.

While we are closing the file on this special investigation, we expect that this issue will continue to arise in Board reports until the Ministry takes the necessary actions to ensure forest licensees and professionals are protecting scenic viewscapes and meeting the visual quality objectives set by government.

Yours sincerely,



Timothy S. Ryan, RPF
Chair

cc: Tim Sheldan, Deputy Minister
Jennifer Davis, Executive Director, Resource Practices Branch
Kevin Edquist, Director, Compliance and Enforcement Branch