



File: 242665

September 24, 2018

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

Dear Kevin Kriese:

Re: Response to the Forest Practices Board report the Forest and Range Evaluation Program

On behalf of the Ministry of Forests, Lands, Natural Resource Operations & Rural Development (FLNRORD), please accept this letter as government's response to the Forest Practices Board's (the Board) recommendations in its special report on the Forest and Range Evaluation Program (FREP) (November 2017).

Before responding, I would like to express appreciation to the Board for its comprehensive analysis of the issues associated with FREP, and the *Forest Range Practices Act* (FRPA) framework more broadly. The Ministry views this report as an opportunity to confirm government's commitment to effectiveness monitoring as a fundamental part of forest management in BC. The Province is also committed to the continuous improvement of FREP and the FRPA framework more broadly, to ensure monitoring information is effectively supporting resource stewardship and professional reliance.

While there continues to be strong support from government and licensees for the need for a strong effectiveness evaluation program, there is also growing interest in using FREP protocols and monitoring results to support a wider range of applications, such as land use planning and a range of resource management decision-making. In the spring of 2018, the Resource Stewardship Division of FLNRORD re-organized to integrate the FREP and Cumulative Effects (CE) programs within a CE & Integrated Monitoring (CE & IM) unit in the new Resource Planning and Assessment Branch (RPAB). With this integration there are opportunities for more effectively integrating the design and delivery of landscape level CE assessments and FREP field based monitoring, and improving the landscape level context for

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FREP evaluations. However, I also want to stress that the Ministry's commitment to delivering on the mandate of FREP remains unchanged within this new organizational structure.

In response to the Board's recommendations for improving FREP, as well as the commitment to an integrated monitoring and assessment program, RPAB has retained consultant support to undertake a Strategic Program Review this year. The outcomes of this review will be reflected in an updated 3-year strategic plan for FREP specifically and for CE & IM more broadly by March 2019, a Licensee Engagement Strategy by March 2019, and an updated Resource Stewardship Monitoring and Evaluation Framework by June 2019.

Actions specific to the Board's five recommendations are detailed further below.

Recommendation 1

FREP should clarify and communicate to all involved what is meant by the measure of "sustainability" it uses, and how that relates to government's objectives for the values specified in FRPA. This should include the linkage between the impact ratings and sustainability measures and how the information is to be used by licensees and by decision-makers such as district managers approving forest stewardship plans.

Government response

The Ministry agrees that further work is required to more clearly define and communicate the linkages between FREP's impact rating system for each value, measures of sustainability and how this relates to FRPA objectives for each value. This work has been initiated as part of the Strategic Program Review that is underway, and is linked to recommendation 2 below as well. Outcomes will be documented in an updated *Resource Monitoring and Evaluation Framework* that clearly defines FREPs evaluation approach, questions, sampling design and impact rating system, and relationship to measures of sustainability and/or the achievement of FRPA objectives.

It is important to note, however, that FREP's foundational role is expected to remain unchanged – in providing science-based, field verified information on the condition of FRPA values that can inform a variety of applications, including effectiveness evaluation of forest practices, forest planning and decision-making, and a broader range of resource stewardship applications.

Actions for improving how FREP and other monitoring information are used to inform government and licensee decision-making are discussed under the response to recommendation 5.

Recommendation 2

FREP should review the design of the monitoring program to ensure it can answer the priority evaluation questions and also develop new questions to address emerging information needs. It is essential that FREP is collecting the right data and providing the information that forest managers require today. This review should include consideration of long-term routine monitoring of specific sites in addition to the current approach of random sampling.

Government response

The Ministry agrees that FREP needs to ensure its monitoring program is designed to deliver the most effective information relative to its mandate, and that this will necessitate periodic review and revisions to the program. As part of its Strategic Program Review this year, FREP will be reviewing the evaluation questions currently defined for each value it monitors, considering new or revised questions that have been identified for FREP specifically and the CE & IM program more broadly, and determining whether to revise the evaluation questions. That decision will in turn inform whether and how to revise the sampling design required to address any revised evaluation questions.

The Ministry also agrees that it is important to resource some intensive sampling and evaluation projects that are designed to address specific priority issues, and to support long-term routine monitoring of some sites. As one example, we are explicitly considering how to resource long-term monitoring for some selected riparian sites, so that trends in condition over time can be evaluated.

However, we also believe there continues to be value in the routine, random sampling carried out by FREP today, and that it would not be wise to drop this entirely in order to resource targeted, intensive sampling to address specific issues. As described in the Board's report, FREP currently sets targets for 30 samples per year (and 30 samples per value over a five year period) in each District, using random cutblock selection. It is through this routine sampling that the program now has sufficient data to be able to infer conditions, trends and causal factors, to identify specific issues that warrant more intensive monitoring or research, and support reporting and extension with licensees.

In 2016 FREP commissioned an independent review of its sampling approach which ultimately concluded that this design was the most efficient and effective way of addressing program goals, as it ensures that a relatively small amount of samples can lead to inferring conditions, trends and causal factors for larger sample populations. It allows flexibility in the questions that can be asked of the data and can be supplemented to address district or issue specific questions.

Where resources and data permit, FREP has and will continue to undertake special projects to evaluate emerging issues and questions. For example, program staff recently evaluated the condition of small streams across BC and the forest practices that led to the observed outcomes, by using available FREP data that included small streams. The results of this analysis then supported a special small streams project on Vancouver Island that further evaluated riparian practices.

FREP monitoring protocols are also increasingly being used by other programs and agencies for different purposes – such as validating landscape level assessments of condition and trend for selected values, or evaluating the effectiveness of practices in other industries – with sampling designed to address the defined questions for each application. And there continues to be growing interest from First Nations in collaborative monitoring, and partnership projects to support this, that may provide incremental opportunities for resourcing monitoring.

As part of its Strategic Program Review, FREP will be identifying new or revised questions and applications for monitoring, and considering how best to resource these, while still continuing with a basic amount of routine sampling by District. The program will be considering criteria for determining when there may be sufficient data from routine sampling for each value, to enable re-allocation of resourcing to an intensive project. For example, there is a new wetlands protocol that is of strong interest to staff and First Nations in some areas, and we will be considering where it might be appropriate to reduce stream riparian sampling in favour of wetland sampling for a period of time, or whether there are opportunities to support incremental sampling for wetlands.

Recommendation 3

FREP should fully implement effectiveness monitoring for soils, wildlife, wildlife habitat, plant communities, landscape-level biodiversity, and values established under the Government Actions Regulation (e.g., wildlife habitat areas) and land use orders.

Government response

The Ministry generally supports this recommendation, and continues to make progress towards this goal. Today, FREP is actively monitoring 6 of the 11 FRPA values: riparian/fish, water quality, biodiversity (stand and landscape level), cultural heritage resources, visual quality, and timber (stand development). Monitoring protocols have been developed for soils and recreation, and periodically implemented and reported. The Range Program has developed a protocol for assessing the effectiveness of range practices on plant communities and riparian areas – the results of which are reported in FREP program reports.

A draft protocol developed for karst – an important ‘resource feature’ under FRPA – will be pilot tested this year for implementation. A new wetlands protocol has recently been

developed in partnership with the BC Wildlife Federation, with pilot testing underway this year. And finally, work has been completed on a draft protocol for monitoring wildlife, with recommendations for measuring additional attributes related to wildlife as part of stand level biodiversity monitoring. Further work will consider the integration of landscape level assessments completed under the Cumulative Effects Framework for wildlife, and the potential to assess designated areas such as Wildlife Habitat Areas (WHA's) and Ungulate Winter Ranges (UWR's).

FREP 2018/19 priorities for completing or improving monitoring protocols are focused on the following:

1. completing a landscape level biodiversity protocol, integrating work completed through CE and FREP to date;
2. completing a wetlands protocol, incorporating improvements based on field testing;
3. completing a karst protocol with final revisions confirmed through field testing;
4. confirming next steps for a wildlife protocol, with consideration to integrating landscape level assessments and stand level monitoring; and,
5. scoping potential improvements to recreation monitoring, in collaboration with the recreation program.

Priorities for the next three years will be defined in an updated 3 Year Strategic Plan, and aligned with available resourcing. Further improvements to cultural heritage resource (CHR) monitoring are expected to be a priority to undertake in collaboration with First Nations over the next three years, as is completion of a wildlife protocol. The program has been successful in securing some additional program resourcing this year, through integration with the CE program and new positions, and will continue to actively pursue opportunities for further resourcing within government and potentially through partnership arrangements.

Recommendation 4

FREP should engage licensees and their professionals in all aspects of the monitoring program. FREP should also directly involve government and industry specialists in the monitoring program on an on-going basis, particularly in researching the causal factors affecting the condition of values. This should help to address industry concerns and build credibility, improving licensee confidence in FREP's monitoring.

Government response

FREP recognizes the importance of engaging with forest licensees and their professionals and has supported this in various ways to date, such as the following:

- District staff frequently invite licensee professionals to join them when sampling their cutblocks;

- Some Districts extend and discuss FREP monitoring results with licensees through active District or TSA committees and field trips, with Branch support where possible;
- Branch staff have been developing summary reports of annual FREP riparian monitoring results and identified causal factors for each licensee area, and providing these to licensees so they can be aware of results within a reasonably short-time frame;
- FREP recently piloted an interactive approach to engaging licensees around the province regarding best management practices around small streams;
- Licensees were invited to provide feedback on the riparian protocol which resulted in amendments to the protocol, and follow up discussions with licensees in 3 sessions to convey the nature of these amendments.

Nevertheless, FREP is committed to strengthening licensee engagement, and is developing a Licensee Engagement Strategy, in consultation with District Managers, forest industry representatives, the ABCFP Stewardship Committee, and other key stakeholders, potentially through an advisory committee. This strategy will consider actions to:

- Engage licensee input in the continuous improvement of monitoring protocols;
- Increase licensee participation in field sampling;
- Increase licensee engagement in the review of monitoring results, identification of causal factors and opportunities for improvement to field practices;
- Identify existing, effective models for district and licensee engagement on monitoring results and practices, and support the implementation of structures for engagement across the province.

Although not a specific recommendation from the Board, it is important to note that FREP is also committed to strengthening engagement and collaboration with First Nations in monitoring and reporting. The program will continue to support First Nations participation in field sampling and opportunities for increased partnership through defined projects.

Recommendation 5

FLNRO should implement a collaborative process at both the provincial and district levels to facilitate continuous improvement of practices based on FREP's monitoring results. At the provincial level, government should have a process to implement changes to legislation and/or policy where improvements are not made voluntarily.

Government response

The Ministry agrees that the FRPA framework requires a well-functioning feedback system to ensure stewardship monitoring will inform the continuous improvement of forest practices.

As noted in the response to recommendation 4, actions will be pursued to strengthen licensee engagement at a District level, and in turn, opportunities to support voluntary improvements

to practices. The program will also identify and profile examples of how FREP information has effectively informed forest stewardship planning and decision-making, to support and provide further direction for staff and decision-makers.

At a provincial level, FREP will continue to report on key issues and trends identified through monitoring across the province, and to support work led by the Resource Practices Branch in considering necessary improvements to FRPA policy, regulation or legislation.

Proposing legislative changes to FRPA for the consideration of Government is a current priority for the Ministry. Several changes to be proposed this fall are the direct result of FREP monitoring results. The Ministry has plans to engage further with the Board and widely with many others in the near future on potential improvements to FRPA legislation and how it can help create a strong feedback loop.

In closing, the Ministry would like to reiterate appreciation for the Board's comprehensive review and insightful recommendations for improving FREP.

If the Board has any questions regarding this response and the Ministry's actions to address the Board's recommendations, please contact Matt LeRoy, Manager, Cumulative Effects & Integrated Monitoring, Resource Planning and Assessment Branch at Matthew.LeRoy@gov.bc.ca or via phone at 778 974-2405.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Ethier', written in a cursive style.

Tom Ethier
Assistant Deputy Minister
Resource Stewardship Division
Ministry of Forests, Lands, Natural Resource Operations and Rural Development



File: 97350-20/15019

October 25, 2018

Tom Ethier
Assistant Deputy Minister
Resource Stewardship Division
Ministry of Forests, Lands, Natural Resource Operations & Rural Development
Box 9532, Stn Prov Govt
Victoria, BC V8W 9M1

Dear Tom Ethier:

Re: *Report on the Forest and Range Evaluation Program - FPB/SR/54*

Thank you for your letter of September 24, 2018, responding to the Board's recommendations. We are pleased to see that government is working on improving the Forest and Range Evaluation Program (FREP), including developing a new 3-year strategic plan and a licensee engagement strategy. FREP is a fundamental part of the FRPA framework and key to continuous improvement of forest and range practices.

We are satisfied that government is taking action to address the recommendations made by the Board in this report. We strongly encourage the ministry to make this work a priority and to implement it as quickly as possible.

We believe the strategic plan is critical to success. It needs to set a clear direction and vision for the program, and go beyond the scope of previous plans. It would be beneficial to engage in a meaningful way with First Nations and licensees during development of the plan to ensure the program has a high level of acceptance. We would be pleased to have our staff consult with your FREP team as the strategic plan is developed.

The Board also believes that proactive sharing of information, perhaps through conferences or workshops, will be necessary to improve the program; we are prepared to act as a catalyst for proactive information sharing opportunities. We would be willing to provide our staff to attend and participate to bring the learnings from this special report to the discussions.

Due to the importance of monitoring to the success of FRPA, we will continue to

Tom Ethier
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highlight this report to encourage continuous improvement. We are considering a range of avenues for the Board to maintain a high degree of focus on improved monitoring — such as our role in public outreach, follow up through presentations at conferences, issuing newsletters or bulletins, and highlighting best practices in monitoring through our newsletter, our ABCFP column and our social media platforms. Our staff will follow up with FREP staff to discuss our plans so that we can help the Ministry maximize the success of this program.

We look forward to seeing this work get underway and respectfully request that you provide the Board with annual updates as the work proceeds and as improvements to the FREP program are implemented.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Kriese', followed by a horizontal line.

Kevin Kriese
Chair

cc: Norah White, Manager, Sustainable Resource Management
Matthew LeRoy, Manager, Cumulative Effects and Integrated Monitoring