



Forest Practices Board

File: 97350-20/20053

February 13, 2023

VIA Email

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Assistant Deputy Minister
Ministry of Land, Water and Resource Stewardship
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Dear Shane Berg and James Mack:

Re: Government's Response to *Forest Practices and Water: Opportunities for Action*

Thank you for your letter of October 20, 2022, responding to the Forest Practices Board's special report *Forest Practices and Water: Opportunities for Action* (the report).

The Board appreciates and has acknowledged that there are a number of government-led policy and planning initiatives aimed at improving water stewardship. However, the Board remains concerned that these actions may fall short of the intended outcomes for water stewardship.

Forest landscape planning and forest operations planning show potential for identifying desired outcomes for watershed-level management. However, it may take up to a decade before we see practices change on the ground.

In the meantime, government is relying on the forest operations map (FOM) to seek stakeholder input for the protection of FRPA values, including water. Although this is a positive step to improve public engagement, the Board is concerned that the FOM will not adequately address the current risks posed to watersheds because it does not provide the public and stakeholders the opportunity for meaningful involvement in the planning process at a watershed level.

As stated in its report, the Board believes that widespread management of cumulative effects within watersheds is a priority. The Board is concerned that relying upon the

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forest landscape planning process alone to address the management of cumulative effects will result in further impacts to watersheds. Managing cumulative effects in all watersheds is an enormous task, but the Board encourages government to require watershed level management of risk.

Finally, in May 2020, the Board published its special investigation report "*Conserving Fish Habitat under FRPA- Part 2*" which recommended improvements to the regulation of sediment. In its response, government agreed with the need to make improvements to how sediment management is regulated and described how this would be implemented in upcoming FRPA amendments. The Board would appreciate an update on the steps taken to improve the regulations in FRPA for sediment management, in light of your response.

We look forward to further discussion with you on these points.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Larson", written in a cursive style.

Bruce Larson,

A/Chair

cc: Albert Nussbaum, Executive Director and Deputy Chief Forester
Leah Malkinson, Manager, Sustainable Resource Management
Ted Zimmerman, Executive Director, Water Protection and Sustainability
Karen Wylie, A/Senior Policy Analyst