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**APR 15 2004**

Warren Jukes, R.P.F.  
Management Forester, Peace Region  
Fort St. John Pilot Project Participants  
c/o Canadian Forest Projects Ltd.  
PO Box 180  
Chetwynd, British Columbia  
V0C 1J0

Dear Warren Jukes:

Your proposed Sustainable Forest Management Plan (SFMP) for the Fort St. John Code Pilot, dated March 15, 2004, for the period of April 1, 2004 to March 31, 2010, is hereby approved.

We found the plan comprehensive and well written, however, due to the format of the plan, it is difficult to distinguish between elements of the plan that require approval, from those elements that do not require approval. Code pilot requirements are inter-mixed in with CSA requirements throughout the document. Future SFMP's should follow a format that separates regulatory requirements from certification requirements.

As required by the Forest St. John Code Pilot Regulation (FSJPPR) Section 38(7), public notice was given and written comment and revisions to the draft plan were included. In accordance with Section 39(1) of the FSJPPR, we are satisfied that the plan is consistent with the requirements of the regulation, provides at least the equivalent protection for forest resources and resource features as provided by the Code Act and regulations, and will adequately manage and conserve the forest resources.

Although we believe that the SFMP can be implemented largely as proposed, the following are some comments, provisions and recommendations that need to be considered and implemented prior to the submission of the next plan.



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### ***1. Landscape Level Reforestation Strategy***

- a) It is requested that the participants provide an evaluation of the proposed target (and variance) for the reforestation assessment indicator (6.29) by March 31, 2007 based on the first three years' experience with the new system.
- b) For Indicator 6.28, Species Composition, it is requested that the indicator statement, target statement, and acceptable variance be identified as a performance indicator for which participants are legally accountable.
- c) Given the significant shift in how the participants and the Ministry of Forests (MOF) will be managing reforestation obligations (i.e. at the landscape level), the MOF requests that complete and up-to-date procedures documents be developed in order to understand the change and replicate the measurement of results. Ministry staff can then inspect cutblocks for adherence to the new sustainable forest management plan requirements, verify reforestation declarations, and enforce requirements. It is requested that these procedures be in place prior to receipt of the first series of free growing submissions. Therefore, Participants are requested to work with MOF staff to put these procedures in place within the next year.
- d) The annual reports that provide the achieved levels of the reforestation indicators should be designed to help the MOF monitor participant's performance and target compliance and enforcement activities. It is requested that the participants work with MOF staff to define reporting requirements that meet the needs of both parties, within the next year.
- e) Participants are requested to develop a proposal to amend the Fort St. John Pilot Project Regulation to maintain consistency of the penalties for failure to achieve minimum standards of reforestation within the next year.

### ***2. Mixedwood Management Strategies***

Concern was expressed over the limited description of mixedwood management strategies. Participants are expected to continue to work with the district committee to define a mixedwood management strategy for the Pilot area by March 31, 2005.

### ***3. Oil and Gas Operations***

There is a concern that some SFMP objectives may be impacted due to other uses of the land base. We encourage you to work collaboratively with the oil and gas industry on a co-ordinated approach to operational planning in order to reduce impacts on the timber harvesting land base.

### ***4. Non-replaceable Forest Licenses***

As a result of the annual allowable cut (AAC) uplift within the Fort St. John Timber Supply Area (TSA), there is the possibility that non-replaceable forest licenses will be awarded to First Nations within the pilot project area. This could have an impact on the landscape level strategies, code pilot membership and CSA certification for the



area. However, we will work with the participants to reduce the overall impact of such a possibility.

**5. *Forest Health***

We support the participants' intent to work with ministry staff to develop a forest health strategy, including the need for a risk rating system within the next 12 months.

**6. *Reporting of Activities***

Participants are to work with government to determine the best way of accomplishing the reporting of activities, including geo-referencing of spatial attributes (i.e. roads and cutblocks), harvesting information (i.e. species, stand ages, volumes, harvesting method, location and block size) within the next 12 months. We also recognize and support the key objectives of streamlining government review and approval processes, the results based focus, and reducing costs to government and participants.

**7. *Spatial Distribution of Patches***

While we acknowledge some of your suggestions as to how to do this (i.e. apply patch size targets to smaller landscapes and identifying larger mature patches for each landscape unit), we ask that you work with government staff to develop spatial distribution measures by March 31, 2005.

**8. *Timber Pricing***

Within the pilot project area over the last two years, there have been significant amounts of unbilled scale due to harvesting occurring without rates being assigned.

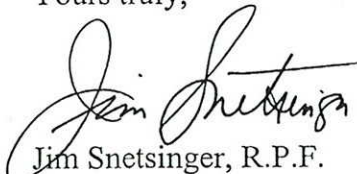
MOF staff will carry out a review and make recommendations to reduce the amount of unbilled scale to the MOF and participants.

**9. *Soil conservation***

Participants are encouraged to develop a soil conservation strategy as part of the next SFMP.

In closing, we are encouraged by the level of co-operation and progress to date in furthering sustainable forest management in the Fort St John TSA. We look forward to working with you on some outstanding issues, and our new monitoring role in this results-based environment.

Yours truly,



Jim Snetsinger, R.P.F.  
Regional Executive Director  
Northern Interior Forest Region



Andy Ackerman  
Regional Manager  
Ministry of Water, Land and Air Protection