November 6, 1998

To: All South Island Forest District Licencees

Dear Sir:

To assist in the preparation and approval of Forest Development Plans (FDP) submitted for approval after October 15, 1998 within the South Island Forest District (SIFD) the following guidance is provided for key items of the Operational Planning Regulation (OPR). While this letter provides my expectations for specific areas of the OPR with respect to FDP preparation; I must remind licencees that each FDP must be evaluated on its own merits and therefore departures from the guidance of this letter may occur in specific circumstances.

1. **OPR Section 2**
   
   Section 2(2) provides the authority to approval all or part of an FDP jointly with Ministry of Environment, Lands, and Parks (MOELP). In addition to the automatic legislated requirements of joint approvals under Forest Practices Code section 41(6); FDPs covering those areas of the Vancouver Island Land Use Plan known as Special Management Zones (SMZ) (formerly known as Low Intensity Areas) will be jointly approved by Ministry of Forests (MOF) and MOELP. All FDP’s within the Clayoquot Land Use Decision Area shall be jointly approved by MOELP and MOF. Since the OPR now has different requirements for joint approval areas; please ensure your FDP addresses the appropriate requirements at the time of the FDP submission for review and comment.

2. **OPR Section 7**
   
   Section 7 provides the authority for the District Manager to direct the referral of a FDP to a person or agency. The referral instructions for a particular FDP will be provided with the District Manager approval letter for your public review advertisement. Typically; the referrals will include: (a) MOELP - Habitat Protection, (b) MOELP - Water Management for community watershed portions of the FDP (c) Department of Fisheries and Oceans (DFO) (d) Ministry of Tourism, Small Business and Culture for SMZs and Clayoquot Sound (e) Ministry of Energy and Mines - Energy and Minerals Division - road portion only (f) Parks Canada and MOELP-Parks for portions of the FDP adjacent to parks. FDP amendments that require a review and comment process require approval of the advertisement for each amendment prior to commencing the review and comment process.

3. **OPR Section 12**
   
   The terrain mapping component of the FDP has been subject to revised implementation dates since the inception of the FPC. This terrain mapping component of the OPR has a current implementation date of June 15, 2000 for community watersheds designated on
June 15, 1995. However; I realize some licensees have already completed this mapping for their community watershed portions of an FDP. Although not a mandatory FDP requirement; I encourage licensees to provide this terrain mapping in FDPs if the mapping has been completed.

4. **OPR Section 13**
   Section 13(b) requires the FDP to provide a forest health assessment determining the nature and extent of forest health factors if instructed by the District Manager. I expect the FDP to describe in a general manner the abiotic and biotic forest health factors that affect the area under the plan. The FDP will generally describe as required by section 18(1)(t) measures to reduce the risk of the identified forest health risks. At the time of this letter, no detailed forest health assessments under section 13(b) are instructed for a 1998/1999 FDP submission.

5. **OPR Section 14**
   Section 14 outlines the requirements of Community Watershed Assessments (CWAP). Please note, that the OPR requires that the watershed assessments be completed prior to the submission of an FDP for review and comment. In addition; the CWAP must have been completed within the previous three years of date of submission for approval of the FDP. FPC designated Community Watersheds have an automatic requirement for a CWAP. However; other watersheds may be instructed by the District Manager for completing a CWAP. Please be advised that only those “other” watersheds where a district manager has instructed in writing the completion of a CWAP are CWAPs a mandatory requirement of a FDP. However; I realize some licensees have already completed CWAPs for other watershed portions of an FDP. I encourage licensees to describe how their FDP is consistent with the recommendations and results of a “non” mandatory CWAP. Please note that for these non-mandatory CWAP’s; section 18(1)(y) is not a FDP requirement.

6. **OPR Section 15**
   The riparian class of streams, wetlands and lakes under section 15 shall be those features shown on a reconnaissance fish and fish habitat inventory map, forest cover map or a terrain resource inventory map. As such; this riparian information is only required at the 1:20,000 scale in the FDP. (i.e. 1 5000 scale map information not required).

7. **OPR Sections 16 and 17**
   When considering the requirements of sections 16 and 17; ensure that you consider how your FDP has “identified an area in the FDP” under section 18(1)(c)(i) as having a certain terrain stability characteristic. Note that section 18(1)(c)(i) requires the FDP to provide terrain information for the area under the plan for only one of the areas described under section 18(1)(c)(i). Therefore; the FDP would only require a terrain stability field assessment for one of sections 16(1)(a), 16(1)(b) or 16(1)(c) and one of sections 17(1)(a), 17(1)(b) or 17(1)(c).
8. **OPR section 18(1)(a)**
   When providing mapping information regarding forest cover; if the licensee has a GIS mapping format; I encourage licensees to provide colour theme forest cover mapping for the entire area under the plan. While this colour theme mapping is not a mandatory OPR requirement, it greatly assists the public, agencies and statutory decision makers in the review and approval of an FDP.

9. **OPR section 18(1)(d)**
   The 1998/1999 FDPs are not required to show the operability line.

10. **OPR section 18(1)(e)(vi)**
    Unless revised by subsequent statutory decision maker notification; the forest ecosystem networks (FEN) established under the approved Management Plans for TFL 44 (outside Clayoquot Sound) and TFL 46 are the only known FENs for FDP submissions in the SIFD.

11. **OPR Section 18(1)(e)(viii)**
    Unless revised by subsequent statutory decision maker notification; the former Port Alberni Forest District portion of the South Island Forest District (SIFD) does not have known scenic areas. The former Duncan Forest District portion of the SIFD has known scenic areas as described in the District Manager letter dated October 17, 1996.

12. **OPR Section 18(1)(e)(ix)**
    Unless revised by subsequent statutory decision maker notification; only those ungulate winter ranges identified in the recent October 16 or 23, 1998 letters regarding the grandparenting of ungulate winter ranges are known ungulate winter ranges for the 1998/1999 FDPs.

13. **OPR Section 20**

    a) With respect to the certification requirements of Category A cutblocks under section OPR 20(3); please refer to the attached Forest Practices Code, General Bulletin # 14 for the three possible options for completing the requirements in the FDP.

    b) Please note that OPR section 23 has been amended by B.C. Reg. 373/98. The revised section 23 is attached.

    c) Please note the requirements of section 20(2) with respect to showing approved category A cutblocks on a proposed FDP. If an approved category A cutblock does not meet the requirements of section 20(2); the status will change to a "proposed" category A cutblock.

14. **OPR section 25.**
    Please ensure the request for FDP advertisement approval is submitted to the District
Tenures Forester/Officer at least 10 working days prior to your need for initiating the advertisement. As identified earlier in this letter, the advertising approval letter will provide the District Manager FDP referral directions.

15. OPR section 26
As provided in section 26(1)(a); the FDP shall be submitted to the District at substantially the same time as the first advertised notice. I expect that the referral persons or agencies will have a copy of the FDP at the commencement date of the review and comment period. The 60 day referral period should be clearly identified in the FDP submissions to ensure all referral agencies and the public are clearly notified of review and comment period.

For areas outside the Clayoquot Sound Land Use Decision area; copies of the sections 13, 15, 16 and 17 assessments referred to in section 26(2) are not required to be submitted with the FDP for the review and comment process. If not already submitted to the MOF; a copy of a FDP related CWAP is required with a FDP. However; during the review and comment process, the approval process or at a later time a District Manager may request a copy of a specific assessment referred to this section. I encourage the licensees to provide a synopsis of the findings and recommendations of the assessments in the FDP. This information will assist in minimizing a District Manager’s request for a copy of the assessments. Please note that the OPR does not require a licensee to provide a copy of an assessment to anyone other than the District Manager except in a joint approval area where MOELP has the authority to request a copy of an assessment.

For areas within the Clayoquot Sound Land Use Decision area; all assessments referred to under section 26(2) shall be submitted with the FDP for review and comment.

16. OPR section 27
Normally the FDP assessments are not required to be provided at a location other than the licensees place of business nearest to the area under the plan. If another location is required; the instruction will be provided within the FDP advertising approval letter.

17. Other items.

a) The licensee is not expected to provide 1:5000 scale cutblock or road location maps with the FDP.

b) The licensee is encouraged to provide a minor salvage component for the FDP similar to previous FDP submissions (upgraded to the current OPR requirements) to provide the full implementation of opportunities available under the FPC Act and Regulations in the area of salvage operations.

c) The licensee is encouraged to submit the FDP using the most recent standardized Provincial FDP template. While not a mandatory requirement; the use of the template.../5
will assist in the review and comment process and compliance with mandatory OPR requirements for a FDP submission.

Although not a FDP related issue; I wish to advise the SIFD licencees of my requirements under section 37(1) of the OPR. For all areas of the SIFD other than the Clayoquot Sound Land Use Decision area; copies of the assessments required under section 37 are not required at the time of submission for approval of a silviculture prescription. However; through the review and approval process or at a later time; a District Manager may request a copy of any assessment referred to under section 37 for a specific silviculture prescription. For areas within the Clayoquot Sound Land Use Decision area; I require all assessment under section 37 be submitted with the silviculture prescription.

Yours truly,

Cindy Stern
District Manager
South Island Forest District

bcc: Bob Crenenza, MOELP, Port Alberni
     Connie Miller-Retzer, MOELP, Port Alberni
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