



File: 18045-30/West Fraser Mills Ltd. Cariboo Region FSP #755

April 30, 2020

Mike Sakakibara, R.P.F.
Planning Coordinator
West Fraser Mills Ltd.
1250 Brownmiller Road
Quesnel, British Columbia
V2J 6P5

Dear Mike Sakakibara:

Pursuant to section 120.1(1) of the *Forest and Range Practices Act* (FRPA), the Minister of Forest, Range and Natural Resource Operations and Rural Development has delegated his authority to me to render this notice of determination, with respect to section 16(1) of FRPA for West Fraser Mills Ltd.'s Cariboo Region Forest Stewardship Plan (FSP) ID #755, submitted on April 9, 2020.

Determination

I am satisfied that the proposed plan has been prepared and submitted in accordance with section 5 of FRPA and regulations.

Accordingly, as the statutory decision-maker under section 16 of FRPA, I hereby approve your FSP. The term of the plan is 5 years commencing on April 30, 2020.

The attached rationale contains exemptions that are important for the implementation and administration of this FSP. If you need clarification on any aspect of this determination, please contact Dale Bubela, R.P.F., Tenures Officer, at (250) 992-4400.

Sincerely,

Josh Pressey, R.P.F.
District Manager
Quesnel Natural Resource District

Attachments: Rationale Supporting the Approval of the West Fraser Mills Ltd. Cariboo Region FSP #755

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Rationale Supporting the Approval of the West Fraser Mills Ltd. Cariboo Region FSP #755

submitted April 9, 2020.

Pursuant to section 120.1(1) of the *Forest and Range Practices Act* (FRPA), the Minister of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) has delegated his authority to me to render this notice of determination, with respect to section 16(1) of FRPA for West Fraser Mills Ltd.'s (West Fraser) Cariboo Region Forest Stewardship Plan (FSP) ID #755.

As the delegated decision maker, I am obligated to determine whether West Fraser's FSP has been submitted in accordance with section 5 of FRPA. I am also obligated to evaluate whether the specified results and strategies are measurable and verifiable (Forest Planning and Practices Regulation (FPPR) section 1(2)), and consistent with the government's objectives (FPPR 25(1) and 25.1).

In making my determination in this matter, I have considered key material submitted by the proponent and review materials developed by staff from the three Natural Resource Districts to which this plan pertains; Quesnel, Central Cariboo, and 100 Mile House. The materials I have reviewed are summarised as follows:

- West Fraser provided FSP text, maps and public review and comment documents received on April 9, 2020.
- West Fraser provided supporting documentation titled: Background and Considerations Regarding Results and Strategies for West Fraser's Forest Stewardship Plan.
- Forest Stewardship Plan Content Review Checklist, Version 2.1, Appendix 2 of the Administration Guide for Forest Stewardship Plans, Volume 1, August 2009.
- FLNRORD developed FSP Objectives Checklist – Cariboo Region (February 2020).
- West Fraser's First Nation information sharing records, dated December 20, 2018 and February 1, 2020.
- FLNRORD developed First Nations consultation record, dated April 30, 2020.

In addition, the following information was considered:

- *Forest and Range Practices Act*
- Cariboo-Chilcotin Land-Use Plan (CCLUP) – 90-day Implementation Process, February 15, 1995

- Forest Planning and Practices Regulation
- Government Actions Regulation
- *Land Act Order for Land Use Objectives for the Cariboo-Chilcotin Land-Use Plan Area*, effective June 25, 2010 (minor amendment signed on May 24, 2011) and consolidated to September 6, 2018
- *Forest and Range Practices Act Administration and General Bulletins*
- Administration Guide for Forest Stewardship Plans, Volume 1, August 2009
- Administration Guide for Forest Stewardship Plans, Volume 2, March 2010
- Chief Forester Guidance on the Replacement of Forest Stewardship Plans, March 2016
- Best Management Practice Guidelines for Harvesting Treatments on CCLUP Grassland Benchmark Sites, August 2007
- *Forest and Range Practices Act Invasive Plant Measures: Considerations for Plan Preparers and Approvers*, June 2016
- Cariboo Region – Dry Belt Fir Management Guideline (2016)
- Replacing forest stewardship plans and sustaining dialogue about forest resource stewardship in the Cariboo Region, April 2016
- Expectations for Cariboo Region Replacement Forest Stewardship Plans – Update #2 Landscape Level Biodiversity, February 2017
- Expectations for Cariboo Region Replacement Forest Stewardship Plans - Update #3 Stand Level Biodiversity – Riparian Management and Wildlife Tree Retention, April 2017
- Expectations for Cariboo Region Replacement Forest Stewardship Plans - Update #4 Wildlife, June 2017
- Recommendations for moose and fisher, Nenqay Dene Accord Fish and Wildlife Panel, Update #5, March 2018
- Post-Wildfire Salvage Expectations for Land Use Designations in Cariboo Region, February 2018
- Transition to Green Timber Profiles, August 2017
- Identification and Management of Moose Winter Habitat in The Cariboo Region: Literature Review and Mapping Pilot Study, prepared for BC Ministry of Environment Williams Lake, prepared by Keystone Wildlife Research Ltd., March 2006
- Small Streams Project 2016 Update, District Manager Community of Practice Meeting, July 20, 2016

- Furbearer Cumulative Impact Verification for the Quesnel TSA, dated February 3, 2017 (Updated May 15, 2017)
- Extension Note: BC Journal of Ecosystems and Management British Columbia's Interior, Fisher Wildlife Habitat Decision Aid, Richard D. Weir and Pedro Lara Almuedo, dated October 26, 2009
- Chilcotin Moose Recovery Plan, prepared for: BC Ministry of Forests, Lands, and Natural Resource Management Prepared by: Larry R. Davis, MSc., RPBio., May 2, 2017
- Lillooet Forest District Moose Habitat Handbook, S. L. Lemke, March 2001
- South Chilcotin Moose Habitat and Moose Vulnerability Management Plan. Prepared by: Larry R. Davis, M.Sc., RPBio. and Shawn Meisner, EP, RPF, October 28, 2013
- Extension Note: BC Journal of Ecosystems and Management, British Columbia's Interior Moose Wildlife Habitat Decision Aid. Wayne B. Wall, Myriam Belisle, and Lindsay A. Luke, December 10, 2010
- 100 Mile House, Anahim Round Table, Chilcotin, Horsefly, Quesnel, South Chilcotin, and Williams Lake Sustainable Resource Management Plans
- Cariboo-Chilcotin Land Use Plan - Regional Biodiversity Conservation Strategy and Update notes
- General Wildlife Measures and Identified Wildlife Management Strategies
- *Forest Practices Code of British Columbia Act* Guidebooks
- Association of British Columbia Forest Professionals – various policies

Forest Stewardship Plan Content

I have determined that this FSP meets the content requirements of section 5 of FRPA and the plan is consistent with the timber harvesting rights granted by government as per section 5(2)(a) of FRPA:

- The plan includes a map in a scale and format that is satisfactory.
- The plan provides the boundaries for four Forest Development Units (FDU): Williams Lake Timber Supply Area (TSA), 100 Mile House TSA, Quesnel TSA, and Tree Farm Licence (TFL) 52.
- The plan identifies results and strategies in relation to objectives set by government as required under FRPA 5(1)(b) and 5(1.1).
- The FSP is consistent with timber harvesting rights granted by government for the applicable timber supply area and tree farm licence.
- The FSP has been signed by the person required to prepare the plan as required by FRPA 5(3).

Forest Stewardship Plan Conformity Requirements

This FSP meets legislated conformity requirements. The plan proposes a five-year term effective from the date I have specified in the approval of this plan.

Public Review and Comment

West Fraser has completed the legislated requirements for public review and comment under FPPR Section 22.2 as follows:

- (a) a copy of a notice was published in the Quesnel Cariboo Observer on June 1, 2018 and in the Williams Lake Tribune June 13, 2018. The notices indicated the plan was available for comment for 60 days,
- (b) a copy of each written comment received during the comment period has been submitted,
- (c) a description of any changes made to the plan as a result of the comments received has been submitted, and
- (d) a description of the efforts made to meet with First Nation groups affected by the plan to discuss the plan. More detail can be found in West Fraser's First Nation information sharing records, dated December 20, 2018 and February 1, 2020.

First Nations

Consultation with First Nations regarding the West Fraser Replacement FSP was completed in accordance with government direction. The level of consultation was appropriate given the agreements in place with First Nations, the information sharing efforts of the licensee, and the strength of aboriginal interests.

More information can be found in the First Nations Consultation summary report, dated April 30, 2020, and in the full consultation report stored digitally in FLNRORD's Consultation Record Tracking System (CRTS).

Definitions

Definitions in an FSP are subject to any applicable approval test and may not be accepted if they do not meet the approval tests. For example, if a definition applies to a result or strategy, I must assess whether the proposed result or strategy, given the application of the definition, is consistent with the relevant objective and is measurable or verifiable. Definitions also cannot have the effect of directly or indirectly changing or limiting FRPA or the FPPR.

I have reviewed the definitions and how they are used in various results and strategies throughout the FSP. I find that the use of all the definitions are appropriate.

Results and Strategies Consistency Test

5.1 Soils – FPPR section 5

For the Soils objective required by section 5 of the FPPR, West Fraser has adopted the practice requirements of FPPR sections 35 and 36 as they were written on the day this FSP was submitted, April 9, 2020. I find this strategy measurable, verifiable and consistent with the Soils objective.

It should be noted that this strategy is **not** an undertaking to comply as described in section 12.1(1)(a) of the FPPR because it uses the regulation as written on the submission date and does not allow for changes to the regulation during the term of the plan. A complete explanation can be found in FRPA Administration Bulletin Number 3, Questions 6 and 7. Given that they have adopted section 35 and 36 of the FPPR into their FSP as a strategy, they are exempted from the practice requirements under FPPR section 12.2(1) and 12.2(2). This distinction will be important for any potential compliance and enforcement actions under this section of the FSP.

5.2 Timber – FPPR section 6 and CCLUP

Although West Fraser was exempted from the FPPR section 6 Timber objective under FPPR section 12(8) and could have been exempted from the CCLUP Timber objectives under FPPR section 12(7), they have prepared an alternate strategy for Secondary Stand Structure practice requirements and have a strategy for the CCLUP access to timber targets.

I find this strategy measurable, verifiable and consistent with the Timber objective and the FPPR Schedule 1 section 1.1 factor for Timber.

Note West Fraser is exempted under section 12.21(1) from section 43.1(1) of the FPPR, however the strategy still requires suitable secondary structure to be retained in accordance with section 43.1(1) but modified by the approved strategy.

5.3 Wildlife – FPPR section 7

West Fraser did not have to specify a result or strategy for the OSBG for Wildlife under section 7 of the FPPR because the minister responsible for wildlife has not given notice under section 7(2) of the FPPR. Despite not being required, West Fraser chose to specify a strategy for the OSBG for Wildlife that relies upon the following sections of the FSP:

- 5.3.2 Regionally Important Wildlife,
- 5.3.3 Wildlife Species at Risk, and
- 5.3.3.18 Additional Wildlife Species not previously specified.

I find this strategy measurable, verifiable and consistent with the FPPR section 7 OSBG for wildlife.

5.3.2.1 Moose - CCLUP and LAO 32

Objectives Set by Government (OSBG) have been set for Moose in the CCLUP and in LAO Objective 32. West Fraser has included results or strategies that retain security and thermal cover around wetlands consistent with the OSBG.

Conditions for security and thermal cover targets were implemented in recent extensions of West Fraser's previous FSP. West Fraser adopted most of the conditions for security and thermal cover except for security cover within the SBPS, IDF, or MS BEC zones. The conditions used 70% of the area retained for security cover whereas West Fraser used 60% which is consistent with the report prepared by Keystone Wildlife Research Ltd. West Fraser's strategy contains provisions for visual screening of views from roads into harvested areas within 500 metres surrounding high value moose wetlands.

The CCLUP also identified access management as necessary to maintain moose habitat. West Fraser's strategy limits construction of roads near wetlands, as well as putting a cap on road densities within 1 kilometre of a high value moose wetland. This is a step towards addressing the statutory decision maker's expectation to address cumulative effects within the FSP. This strategy for moose was co-developed with wildlife experts (Larry R. Davis, MSc., RPBio) and First Nations input.

I find this strategy measurable, verifiable and consistent with the OSBG for Moose.

5.3.2.2 Mule Deer - CCLUP

West Fraser has adopted as a result or strategy the General Wildlife Measures (GWMs) specified for the applicable Government Action Regulation (GAR) order for Ungulate Winter Ranges (UWRs) U-5-001, 002, and 003.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.2.3 Furbearers in General -CCLUP

West Fraser has provided results or strategies for Furbearers in General and together with the results or strategies written for Fisher, are consistent with the CCLUP objectives for Furbearers.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.3 Species at Risk and other sensitive habitats – CCLUP

West Fraser's strategy for Species at Risk and other sensitive habitats adopts the applicable GWMs and relies upon the following FSP sections:

- 5.3 Wildlife,
- 5.4 Riparian Areas,
- 5.5 Fish and Sensitive Habitats,
- 5.7 Biodiversity,
- 5.8 Visual Quality,
- 5.9 Cultural Heritage,
- 5.12 Wildcraft, and
- 5.15 CASC.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.1 Mountain Caribou (Eastern) - CCLUP

West Fraser adopted the GWMs and WHAs for Mountain Caribou. In addition, they have a strategy for Caribou observed outside the WHAs that meets the expectation of the SDMs.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.2 Northern Caribou (Western) - CCLUP

West Fraser adopted the GWMs and WHAs for Northern Caribou. In addition, they have a strategy for Caribou observed outside the WHAs that meets the expectation of the SDMs.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.3 Grizzly Bear - CCLUP

West Fraser has adopted the GWMs and WHAs for Grizzly Bear. In addition, West Fraser has a strategy to address the CCLUP and LAO 33 and 34 objectives for Grizzly habitat outside of the WHAs. The strategy is designed to protect moderate, high and very high Grizzly Bear capability units by protecting salmon and trout spawning habitat near critical Grizzly Bear foraging habitat. Limits are also placed on the construction of roads near herb dominated avalanche tracts. The strategy also limits the amount of herbicide use in the Quesnel TSA and TFL 52 FDU's based on the capability zone. There will not be herbicide use in the Williams Lake and 100 Mile FDU's.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.4 Furbearer – Fisher and Wolverine - CCLUP

West Fraser is using a detailed strategy to manage for fisher across all FDU's. The strategy incorporates the BC Fisher Habitat – British Columbia Fisher Habitat and Forestry Web Module on the www.bcfisherhabitat.ca website into a measurable and verifiable strategy.

Wolverine is managed through general wildlife measures and other strategies contained in the FSP.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.5 American Badger - CCLUP

West Fraser will use a Qualified Professional to assess for potential Badger habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Badger habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.6 Great Basin Spadefoot - CCLUP

West Fraser will use a Qualified Professional to assess for potential Great Basin Spadefoot habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Great Basin Spadefoot habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.7 Flammulated Owl - CCLUP

West Fraser will use a Qualified Professional to assess for potential Flammulated Owl habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Flammulated Owl habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.8 Fringed Myotis - CCLUP

West Fraser will use a Qualified Professional to assess for potential Fringed Myotis habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Fringed Myotis habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.9 Great Basin Gopher Snake - CCLUP

West Fraser will use a Qualified Professional to assess for potential Great Basin Gopher Snake habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Great Basin Gopher Snake habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.10 Lewis's Woodpecker - CCLUP

West Fraser will use a Qualified Professional to assess for potential Lewis's Woodpecker habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Lewis's Woodpecker habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.11 Spotted Bat - CCLUP

West Fraser will use a Qualified Professional to assess for potential Spotted Bat habitat and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations within Spotted Bat habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.12 White Pelican - CCLUP

West Fraser will adhere to the WHA and GWMs established for White Pelican.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.13 Great Blue Heron - CCLUP

West Fraser will use a Qualified Professional to assess for Great Blue Heron habitat and occurrences prior to harvesting cut blocks and roads. Where an occurrence is found, a 12 hectare WTRA will be established and harvesting, road construction and mechanical site prep will not occur within 500 meters of the occurrence between February 15 and August 31.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.14 Dolly Varden (Bull Trout) - CCLUP

S1, S2 and S3 streams within 100 metres of harvest areas will be assessed for potential Dolly Varden spawning congregation potential by a Qualified Professional. If spawning capability is found, the Qualified Professional will develop recommendations for management that will be followed by West Fraser.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.15 California Big Horn Sheep - CCLUP

West Fraser will not construct new road in California Bighorn Sheep habitat unless there are no other practicable routes. If roads are constructed or used, work will only be done at specific times during the year and access controls established after work is completed. In addition, West Fraser will use Bighorn Sheep silviculture stocking standards, only undertake brushing when necessary, and not use domestic sheep for vegetation management when performing reforestation on blocks within Bighorn Sheep habitat.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.16 Prairie Falcon - CCLUP

A Qualified Professional will assess for Prairie Falcon occurrences within potential falcon habitat and if an occurrence is found, a 2-hectare WTRA will be established. In addition, no harvesting, road construction or site prep will be done within 300 metres of the occurrence between March 15 and July 30th.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.3.1.17 Sandhill Crane - CCLUP

A Qualified Professional will assess for Sandhill Crane occurrences within potential Sandhill Crane habitat and if an occurrence is found, a 2-hectare WTRA will be established. In addition, no harvesting, road construction or site prep will be done within 400 metres of the occurrence between April 1 and August 31th.

5.3.1.18 Additional Wildlife Species not previously specified - CCLUP

West Fraser will use a Qualified Professional to assess for potential wildlife habitat for the species identified in the table below and create a management plan based on the *Accounts and Measures for Managing Identified Wildlife – Accounts V. 2004* if they propose operations that affect that species habitat.

Table 5.3.3.18

<i>potential habitat BEC Zone</i>	<i>occurrence feature</i>
BG, IDF xh2	QP confirmed Brewer's Sparrow nest site
BG, IDF (xh2, xm)	QP confirmed Burrowing Owl nest site (burrow)
BG, IDF (dk3, dk4, mw2, xh2, xm, xw)	QP confirmed Long-billed Curlew nest site
BG, IDF (mw2, ww, xh2, xw)	QP confirmed North American Racer Snake den or burrow
BG, IDF (dk3, dk4, mw1, mw2, xh2, xm, xw)	QP confirmed Sharp-tailed Grouse nest site or breeding lek
SBPS xc	
SBS (dk, dw2, mh)	
BG, IDF (dk3, dk4, mw2, xh2, xm, xw)	QP confirmed Short-eared Owl nest site
SBS mh	
BG, IDF (dk3, mw2, xh2, xw)	QP confirmed Western Screech-owl nest site
BG	QP confirmed Yellow-breasted Chat nest site
All	QP confirmed sighting of White Pelican

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.4.1 Water, Fish, Wildlife and Biodiversity within Riparian Areas – FPPR section 8

West Fraser has chosen to comply with sections 47, 48, 49, 50, 51, 52(2) and 53 of the FPPR as those sections were on the date of the FSP submission. In addition, West Fraser has specified the definition of the edge of a riparian feature by using the method contained in the Riparian Guidebook (1995).

It should be noted that this strategy is **not** an undertaking to comply as described in section 12.1(2)(a) of the FPPR because it uses the regulation as written on the submission date and does not allow for changes to the regulation during the term of the plan. A complete explanation can be found in FRPA Administration Bulletin Number 3, questions 6 and 7. Given that they have adopted sections 47, 48, 49, 50, 51, 52(2) and 53 of the FPPR into their FSP as a strategy, they are exempted from the practice requirements under FPPR sections 12.3(1) to (7) for operations done under this plan. This distinction will be important for any potential compliance and enforcement actions under this section of the FSP.

5.4.2.1 Riparian classification, Riparian Reserve Zone and Riparian Management Area – CCLUP and LAO 20 and 23

West Fraser has specified a measurable, verifiable and consistent strategy for the Stream, Wetland and Lake Riparian Areas (LAO 20 and 23) objectives. The strategy contains provision for exceptions to address insects, safety stream crossings, yarding and wildfire fuel management consistent with the objectives.

5.4.2.2 Lakes with Lakeshore Management Zones and Lakes with Lake Management Class – LAO 16, 17, 18 and 19

West Fraser has specified a measurable, verifiable and consistent strategy for the Lakes with Lakeshore Management Zones and Lakes with Lake Management Class (LAO 16, 17, 18 and 19) objectives. The strategy contains provision for exceptions to address insects, road and fence crossings, and wildfire fuel management consistent with the objectives.

5.4.2.3 Retention of Trees in a Riparian Management Zone – LAO 21 and 22

West Fraser has specified a measurable, verifiable and consistent strategy for the Retention of Trees in a Riparian Management Zone (LAO 21 and 22) objective. The strategy contains provision for exceptions to address insects, safety stream crossings, yarding and wildfire fuel management consistent with the objective.

The strategy has significantly increased the basal area retention requirement for riparian management zones for all riparian features and classes from previously approved FSPs. The new strategy meets the SDM expectation for enhanced protection of riparian features and the FSP content requirements outlined in Administration Bulletin #4.

5.5.1 Fish Habitat in Fisheries Sensitive Watersheds – FPPR section 8.1

The date specified for this objective (December 31, 2005) has passed, however, the Horsefly River (GAR-F-5-001) and Deadman River (GAR-F-3-013) Fisheries Sensitive Watersheds have been established under the Government Actions Regulation (GAR).

West Fraser's results and strategies for Fisheries Sensitive Watersheds is similar to the latest imposed FSP extension conditions. One notable change is the methodology for assessing Equivalent Clearcut Area (ECA) where West Fraser has allowed for alternate methods to be determined by a qualified professional without a required endorsement from FLNRORD and adoption by all FSP Holders operating in the watershed. It is my expectation that West Fraser make reasonable efforts to collaborate with all other licensees operating within the Fisheries Sensitive Watersheds to agree on a consistent methodology for determining ECAs.

West Fraser has specified measurable, verifiable and consistent strategies for the objectives specified for the Horsefly River and Deadman River Fisheries Sensitive Watersheds.

5.5.4 Salmon - CCLUP

The objective for Salmon is mainly achieved through other objectives such as Riparian, Community Watersheds, Fisheries Sensitive Watersheds, Hydrological Stability, and Biodiversity. West Fraser has included specific results or strategies when operating near the Fraser River mainstem and Chilcotin River mainstem below Hanceville that limits the amount of harvesting and road building on unstable terrain.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.5.5 Hydrological Stability - CCLUP

West Fraser has written results and strategies to undertake hydrologic assessments in key watersheds when the ECA is greater than or equal to 25% in order to assess and provide recommendations to maintain hydrological stability.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.5.6 Critical Habitat for Fish – LOA 12 and 13

West Fraser's strategy for Critical Habitat for Fish is measurable, verifiable and consistent with this objective. The strategy designates critical fish habitat as no harvest areas except for operations required for insect control, road and fence construction, and wildfire fuel mitigation treatments.

5.5.7 Blackwater Quality Fisheries Resources – CCLUP

This strategy relies upon other strategies for the Backcountry, Visual Quality and Riparian Areas objectives. In reviewing the above-mentioned strategies, I am satisfied that the level of protection for Blackwater Fisheries is adequate.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

5.6 Water in Community Watersheds – FPPR section 8.2

West Fraser has adopted FPPR sections 59, 60, 61, 62, 63, and 84 as those sections were written on the date of submission of this plan in their strategy for Water in Community Watersheds. In addition, they have included a commitment to complete assessments on watersheds with old or no watershed assessments completed.

I find West Fraser's results and strategies to be measurable, verifiable and consistent for this objective.

Note that section 12.32 of the FPPR exempts West Fraser from FPPR sections 59, 60 and 61 for operation done under this plan, however, they have adopted those sections as they were written on the day of the FSP submission into the above strategy. Also note that West Fraser is **not** exempted from FPPR sections 62, 63 and 84 and must comply with these sections of the FPPR for the duration of the plan.

5.7.1 Wildlife and Biodiversity – Landscape Level (Patch Size) FPPR section 9 and CCLUP

West Fraser has specified a measurable and verifiable strategy consistent with the CCLUP Objective for Landscape Level Biodiversity, the Letter of Expectation Update #2, and the Regional Biodiversity Conservation Strategy Update Note #4. West Fraser has included plan content for patch size as well as maintaining natural connectivity.

Note that approval of this strategy exempts West Fraser from section 64(1) and 65(2) of the FPPR in accordance with section 12.4 of the FPPR for operations done under this plan.

5.7.2 Old Growth Management Areas – LAO 8, 9, 10 and 11

West Fraser has specified a measurable and verifiable strategy consistent with LAO objectives 8, 9, 10, and 11 and the Letter of Expectation Update #2. West Fraser has included appropriate provision for exceptions for the following reasons: boundary alignment, insect control, guyline tiebacks, thinning from below, and wildfire management.

5.7.3 Seral Stage – CCLUP

West Fraser has specified a measurable and verifiable strategy consistent with the CCLUP Objective for Seral Stage, the Letter of Expectation Update #2, and the Regional Biodiversity Conservation Strategy and updates.

In accordance with section 12(5) and section 12(6) of the FPPR, West Fraser is exempted from the requirement to specify a result or strategy for the CCLUP objective for the old seral targets set out in table 7 of the Biodiversity Conservation Strategy for the term of the plan.

West Fraser has included appropriate provision for insect control and wildfire management exceptions. Additionally, partial cutting has been proposed as a criterion to allow harvesting in a seral deficit unit where harvesting does not remove more than 30% of the green basal area, not more than 40% of total preharvest basal area, and the harvesting is evenly distributed across diameter classes. I am aware of a possible risk where the stand could be partially harvested up to 30% multiple times, which would cause the stand to no longer represent a mature seral condition. I believe this to be a minor risk that is ameliorated by the requirement to maintain 70% of the pre-harvest stand attributes.

5.7.4 Wildlife and Biodiversity, Stand Level – FPPR section 9.1

West Fraser has provided a measurable and verifiable strategy Stand Level Wildlife and Biodiversity under FSP section 5.7.5 for LAO objectives 6 and 7. In addition, West Fraser has adopted section 68 of the FPPR for coarse woody debris management.

Pursuant to section 12(5) and section 12(6), West Fraser is exempt from the requirement to specify a result or strategy for section 9.1 FPPR Wildlife and Biodiversity - Stand Level for the term of the plan.

Pursuant to section 92.1 of the FPPR, West Fraser is exempted from the portions of FPPR sections 66 and 67 that conflict with the strategy for Wildlife and Biodiversity - Stand Level specified in the FSP for the term of the plan.

5.7.5 Wildlife Tree Retention Areas – LAO 6 & 7

West Fraser has specified a measurable and verifiable strategy consistent with the LAO objectives 6 & 7 and the Letter of Expectation Update #2 for Wildlife Tree Retention Areas. In addition, West Fraser has specified strategies for enhanced short-term retention of a minimum 20% until the harvested stand achieves free growing status for stands harvested West of the Fraser River within a seral deficit unit in SPBS, MS, or SBS biogeoclimatic zones.

West Fraser has also included a strategy that protects areas that were specified as enhanced retention under the Chief Foresters guidance on Landscape and Stand level retention in Large-Scale Mountain Pine Beetle Salvage Operations or under the Quesnel District Guidance for Conservation Legacy Areas

5.8 Visual Quality – FPPR section 9.2, CCLUP and LAO 26, 27, 28, and 29

West Fraser has submitted a measurable and verifiable result and strategy consistent with the CCLUP and LAO 26, 27, 28, and 29 objectives. The result requires West Fraser to achieve the visual quality objectives and the strategy allows for exceptions consistent with the LAO. The exceptions allow for harvesting that is essential for insect control, wildfire management, and limited salvage harvesting in severely burnt scenic areas.

5.9.1 Cultural Heritage Resources – FPPR section 10

West Fraser has specified a measurable, verifiable and consistent strategy for the Cultural Heritage Resources objective. West Fraser's strategy relies upon ongoing information sharing between the FSP holder and First Nations of proposed harvesting and road building. When a cultural heritage resource is identified and made known, West Fraser will create a mitigation strategy and communicate it to the appropriate First Nation and to the district manager prior to submitting cutting permits or road permits.

5.9.2 Mature Birch Retention – LAO 24

West Fraser has specified a measurable, verifiable and consistent strategy for the LAO section 24 Mature Birch Retention objective. The strategy requires the retention of 40% of the existing mature birch for areas specified in the LAO and additional landscape units at the request of First Nations.

5.10.1 Backcountry – CCLUP

West Fraser's strategy for the CCLUP's Backcountry objective is measurable, verifiable and consistent. The strategy relies upon referral to potentially affected backcountry user groups and the creation of a mitigation strategy for potential issues. The strategy also has a dispute resolution process that relies on the district manager as the final arbiter.

5.10.2 Restricted Access Development (Charlotte Lake SRDZ) – CCLUP

The FSP relies upon the results and strategies presented in sections 5.12 Wildcraft and 5.15 Community Areas of Special Concern. I have reviewed these sections of the FSP and I am satisfied that this strategy is measurable, verifiable and consistent with the Restricted Access Development objective.

5.10.3 Land Act Order Trails – LAO 30 and 31

West Fraser has written measurable, verifiable and consistent results and strategies for the Land Act Order trail objectives. The results and strategies contain appropriate exceptions to allow for the management of insects and wildfire.

5.10.4 Alexander Mackenzie Heritage Trail – CCLUP

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Alexander Mackenzie Heritage Trail objective. The strategy is consistent with the current management plan for the trail.

5.10.5 Interpretive Forest Sites, Recreation Sites or Recreation Trails – FRPA 181

West Fraser has written a measurable, verifiable and consistent strategy for the Interpretive Forest Sites, Recreation Sites or Recreation Trails – FRPA 181 objective. The strategy relies upon referring harvesting and road building proposals to FLNRORD and codeveloping a management plan for the rec site or trail.

5.11 Tourism – CCLUP

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Tourism objective. The strategy contains a requirement to refer planned operations to affected known tourism operators and commercial recreation tenure holders and give them opportunity to comment. If concerns are raised, West Fraser will develop a mitigation strategy and seek agreement with the affected party. If agreement cannot be reached, a dispute resolution mechanism will be used with the district manager the final arbiter.

5.12 Wildcraft

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Wildcraft objective. The strategy relies upon referral and advertisement of deactivation plans for tenured roads that have been in place for longer than 5 years.

5.13 Pine Mushrooms

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Pine Mushrooms objective. The strategy requires information sharing with First Nations in the Anahim IRMZ, Kleena Kleene IRMZ and Charlotte Alplands SRDZ, and having qualified professional develop a management plan to manage for Pine Mushrooms.

5.14 Grazing – Maintenance of Animal Unit Months – CCLUP

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Grazing objective. The strategy relies upon referral to affect range tenure holders and commits to modifying harvesting or silviculture practices if those operation are impacting the availability of Animal Unit Months (AUMs).

5.15 Community Areas of Special Concern (CASC) – CCLUP

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Community Areas of Special Concern (CASC) objective. The CASC will be no harvest areas unless it is essential for insect control, road and fence construction, or for wildfire management.

5.16 Grassland Habitats – CCLUP

West Fraser has written a measurable, verifiable and consistent strategy for the CCLUP Grassland Habitats objective. The strategy requires West Fraser to operate outside Grassland Benchmark Areas unless it is not practicable to do so. If they operate on grasslands, they must keep soil disturbance below 5% and minimize roads, trails and landings. All disturbance will be grass seeded and all roads trails and landing not needed for long term access will be rehabilitated.

6.1 Measures to prevent the introduction or spread of invasive plants – FPPR 17

West Fraser has written a measurable, verifiable and reasonable measures to prevent the introduction or spread of invasive plants.

6.2 Measures to mitigate the effect of removing or rendering ineffective natural range barriers – FPPR 18

West Fraser has written a measurable, verifiable and reasonable measures to mitigate the effect of removing or rendering ineffective natural range barriers. The measures have an adequate referral and dispute resolution process that allows affected range tenure holders to have input into harvest plans.

Delegated Decision Makers (DDMs) letters of expectations and information regarding FSPs

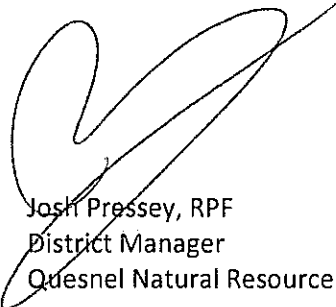
- April 15, 2016 Expectations Letter (Expectation)
 - Did not address DDM expectations regarding Dry Belt Fir (DBF) management in stand level retention or landscape level biodiversity, however there is no OSBG for DBF management.
 - Did not completely address the DDM expectation to incorporate cumulative effects.
 - All other expectations in this document have been met.
- Dry Belt Fir Management (Expectation)
 - West Fraser did not meet this expectation within the FSP, however there is no OSBG for DBF management.
- Landscape Level Biodiversity (Expectation)
 - This expectation has been met.

- Riparian and WTR (Expectation)
 - These expectations have been met.
- Wildlife (Expectation)
 - These expectations have been met.
- SDM Expectations for Moose and Fisher (Expectation)
 - These expectations have been met.
- Small Streams (info)
 - This information has been incorporated into the plan.
- Invasive Plant Measures (info)
 - This information has been incorporated into the plan.
- Furbearers (info)
 - This information has been incorporated into the plan.
- Post-Wildfire Salvage Expectations (Expectation)
 - These expectations have been met.

Determination

I am satisfied that the proposed plan has been prepared and submitted in accordance with section 5 of FRPA and regulations.

Accordingly, as the statutory decision-maker under section 16 of FRPA, I hereby approve your FSP. The term of the plan is 5 years commencing on April 30, 2020.



Josh Pressey, RPF
District Manager
Quesnel Natural Resource District

