

# **HFN Forest Stewardship Plan 2016-2021**

consolidated to Amendment #4

# **BACKGROUND DOCUMENT**



Donna Underwood, RPF 250-586-0200 ext 206 dunderwood@meridianforest.ca

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#### Introduction

This Background Document has been prepared for the HFN Forest Stewardship Plan (FSP) (consolidated to Amendment #4), for the HFN Community Forest Agreement, the Huu-ay-aht First Nations Woodland Licence and the Bamfield Huu-ay-aht Community Forest (BHCF) Licence. Once approved, the FSP document replaces HFN Community Forest Agreement K3N 2011-2016 Forest Stewardship Plan Amendment #1 to Add HFN First Nation Woodland License K4H (now called License #N1A) expiring in April 2016.

### What is a Forest Stewardship Plan?

A Forest Stewardship Plan (FSP) is a landscape plan that states measurable, enforceable results and strategies that must be consistent with objectives set by government for a variety of forest values (e.g. fish, water, biodiversity cultural and heritage resources, etc). The FSP is the plan which shows how HFN will manage all stated government objectives from a site specific level to the landscape level for a period of five years. This type of plan is intended to allow tenure holders to be more responsive to changing market conditions and to allow forest professionals to be innovative in applying management strategies to meet and exceed environmental standards in a manner specific to their operating area.

The FSP takes direction from the Vancouver Island Land Use Plan (VILUP), the Forest and Range Practices Act (FRPA), the Land Act (LA), the Government Actions Regulation (GAR), and the Forest Planning and Practices Regulation (FPPR), grandfathered sections of the Forest Practices Code Act of British Columbia (FPC), and other pertinent legislation that governs forest practices. The FSP is intended to be a succinct document stating the management objectives for the resources in the operating areas or Forest Development Units (FDU) as they are called in the FSP. The FSP is not intended to state methodology or give direction regarding how the management objectives are to be met; that is the role of the forest professionals to decide. The FSP results and strategies must be consistent with government objectives for the management of all resources, and they must be measurable and verifiable.

# **Background Document**

This background document provides additional information in support of the Forest Stewardship Plan (FSP) but is NOT part of the FSP. The purpose of the background document is to:

- 1) To provide the Designated Decision Makes (DDM) with a set of **measurable** or **verifiable** results or strategies against which government enforces compliance. Thereby, ensuring the public and stakeholders that all resource values are being conserved and protected.
- 2) Provide rationale related to the Results and Strategies, stocking standards and measures detailed in the FSP and,
- 3) Provide plain language interpretative information related to the content of the FSP to assist with understanding the plan and the operational planning and implementation process.

The **objectives**, **strategies** and **results** are the core elements of the FSP and are documented clearly in the FSP documents where **Objectives** are referred to as a desired outcomes of forest or range practices under FRPA and

"Result" is defined as:

- a) a measurable or verifiable outcome in respect of a particular established objective, and
- b) the situations or circumstances that determine where in a forest development unit the outcomes under (a) will be applied.

And a Strategy is defined as:

- a) measurable or verifiable steps or practices that will be carried out in respect of a particular established objective, and
- b) the situations or circumstances that determine where in a forest development unit, the steps or practices will be applied.

Forest Development Units (FDU's) identify areas of planned development activities in the next five years. FDUs are general in nature and do not reflect the final development outcomes for a particular FDU. For simplicity, all licenses referred will be further referred in the FSP document and this supporting document as:

Licensee	License	FDU
Huu-ay-aht First Nation First Nations Woodland Licence	CFA K3N	1
Huu-ay-aht First Nation Community Forest Licence	FNWL-N1A	2
Bamfield Huu-ay-aht Community Forest Society	K1E	3

This background document has been structured to mirror the FSP document (headings etc) for ease of cross reference and interpretation.

### **Area Descriptions**

FDU 1 (K3N) is entirely located within the Sarita Landscape Unit (LU) located on the west coast of BC south and east of Barkley Sound. The major drainage includes the Sarita River and Sarita Lake is the largest lake near the tenure. CFA K3N is discontinuous and extends from just east of Numukamis Bay and south of May Lake to the easternmost unit in the Central Main North/Harris Creek Main Unit. These areas total 2345 ha surrounded by TFL 44.

FDU 2 (N1A) is located almost exclusively within the Sarita LU, with only 6.1ha within the Klanawa LU. The FDU is located on the west coast of BC, south and east of Barkley Sound. The licence extends from just east of Poett Nook to branch 279 off Central North Main. It extends south to Somerset 171 and Klanawa 380, west to Bamfield 2660 near the Pachena River. The westernmost polygon of the licence is north of the Bamfield Marine station near Trevor Channel. The total area is 9655 ha and is surrounded by TFL 44.

FDU 3 (K1A) is located in the vicinity of the community of Bamfield. The licence area consists of 3 distinct units of Crown land with a total area of 359 ha.

# **Public Review & Comment (FPPR Section 20)**

The Forest Stewardship Planning process provides for an alternative system whereby other resource users are required to identify areas of concern within FDU's at the FSP stage to ensure that concerns are addressed prior to development of the area. Further referral can be arranged at the FSP stage if knowledge of the final block shape is required to determine impacts on other resources (i.e. visual resources, fish habitat, water values and wildlife habitat values). Comments specific to the FDU's will be recorded and kept on record to ensure that concerns are addressed at the development stage. If requested, affected stakeholders will be provided proposed cutblock shapes and road locations and given an opportunity to provide comments prior to cutting permit application by HFN Forestry Limited Partnership.

This plan is used for both "in-house" planning of harvesting and fieldwork and as the principal referral document for other resource users. As per the requirement in FPPR Section 20 (1) the Forest Stewardship Plan will be made available for public review and comment at the Huu-ay-aht First Nations (HFN) office in Port Alberni for a period of not less than 60 days (FPPR S 20 (2)). The general public will be made aware that the FSP was available for review and comment through advertisements placed in the local newspaper, and through referral notices that were sent out to potentially affected stakeholders. The FSP will made available for public review at the Huu-ay-aht First Nations office in Port Alberni during regular business hours from 8 a.m. to 4 p.m. Monday through Friday.

Additionally, the FSP will be available on the Huu-ay-aht website (<a href="www.Huu-ay-aht.org">www.Huu-ay-aht.org</a>) with a link for the public to provide written comments on the plan. HFN will a referral notice and requested a meeting with neighboring First Nations representatives and Licensees to discuss the FSP document. A referral summary as well as written comments received during the review period and revisions made during the referral period will summarized in Appendices.

### Vancouver Island Land Use Plan (VILUP)

The Vancouver Island Higher Level Plan (VIHLP) Order (effective December 1, 2000) established Resource Management Zones (RMZ) objectives within the FSP Holder(s) license areas covered by VILUP. The vast majority of the area covered by the FSP is located in Enhanced Forest Zones (EFZ) #43 and #44 with a very small area (0.3 ha) located in Special Management Zone (SMZ) #18.

The area located within SMZ#18 occupies a total of 0.3 ha, an area too small to manage. As a result, a written request to the Designated Decision Maker (DDM) to be exempted under Section FPPR Sec 12(7) to provide Results & Strategies for an unmanageable area was submitted and approved. HFN is committed to include that 0.3 ha in FDU 1 and manage that area to EFZ #43 objectives under the FSP.

Several of the results and strategies for the FSP are based on EFZ Objectives addressing the following: short term timber supply, migrating hydrological impacts in Fisheries Sensitive Watersheds, species composition, and the retention of old seral stages and marbeled murrelet habitat

# **Results & Strategies Objectives Set by Government**

The following tables detail the specific Objective set by Government, whether they come from VILUP or the Forest Planning and Practices Regulation (FPPR) and then summarizes each specific result or strategy and discuss how the FSP Holder(s) is committed to ensuring that the result or strategy is measurable or verifiable.

# Order Establishing Provincial Non-Spatial Old Growth Objectives

The Order Establishing Provincial Non-spatial Old Growth Objectives clarifies the amount of area available for timber harvesting. This order supplements, but does not replace FPPR S 9.

Result or Strategy	Is the Result or Strategy Measurable or Verifiable?	
Summary		
To maintain & recruit old growth forests	The Order Establishing Provincial Non-Spatial Old Growth Objectives (NSOG) (2004) designated Landscape Units (LU) and Biodiversity Emphasis Options (BEO) across the Province to ensure the maintenance of old forest by biogeoclimatic variants. The vast majority of HFN's and the BVCF's landbase is located in the Sarita LU. A small area (total of six hectares) is located in the Klanawa LU. Simply put, the FSP Holders must retain a minimum of 13% of the landbase in old and mature forest types which may include younger forests suitable for recruitment, until the DRAFT OGMA has been approved by the MoFLNRO and MoE. At the time of submission of Amendment #4, the DRAFT OGMA had not received final approval and therefore, was not included in the Result & Strategies. Since the 2016 Timber Supply Analysis (TSA) was not available at the time of Amendment #4 submission, the 2010 (FDU 1) & 2011 (FDU 2) TSAs were reviewed. Refer to Table 1:	

Table 1:	
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FDU	Crown Forested Landbase (ha)	Estimate of old of old forest including recruitment (ha)	% old of old forest including recruitment (ha)	Percent Old Forest Retention (minimum %) as per NSOG
1	2213	535	24%	13%
2	9141	2306	25%	13%
3	359	*	*	13%
TOTAL	11,713	2841	25%	13%

#### FDU 3

\*The Timber Supply Analysis Report (February 2014) for the Community Forest Licence K1E (FDU 3) reported 96% (344 ha) of the landbase as old growth (greater than 250 years). Although an analysis of the percentage of old forest retention was not completed for the 2014 report, considering the sustainable harvest rate is proposed at 685m3 -1267 m3/year or the equivalent of 1.0 ha/ year and that the FDU 3 landbase represents 3% of the total landbase for the 3 FDUs, it is reasonable to conclude for the purpose of this document that a minimum of 46 ha (13% of 359 ha) will be retained as old forest including recruitment as per the NSOG Order until the DRAFT OGMA is approved.

Overall, Table 1 shows that the 13% requirement of old forest retention is easily measured and is verifiable.

**Applicable FDUs** 

1, 2, 3

# **HLP Order Objective 7- Short-term Timber Availability**

To increase the short-term availability of timber,

- (a) a cutblock may be larger than 40 ha pursuant to section 11(2)(a) of the OPR; and
- (b) pursuant to section 68(4) of the OPR, a cutblock is greened-up if it is adequately stocked and the average height of those trees that are
- (i) the tallest tree in each 0.01 ha plot included in a representative sample, and
- (ii) a commercially valuable species or other species acceptable to the district manager is at least 1.3 meters; unless the district manager determines that a cutblock referred to under (a) or (b) would significantly impact specific hydrological, wildlife, biodiversity, scenic or recreation values.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Cutblocks in the EFZ may exceed 40 ha and the average height of the tallest 10% of tree are a minimum of 1.3	The size of the cutblock is measurable and the method by which green up is assessed is measurable.
m	
Applicable FDUs	1, 2, 3

# **HLP Order Objective 8 - Hydrological impacts in Fisheries Sensitive Watershed**

Avoid or mitigate adverse hydrological impacts, which may result from the practices referred to in objective 7, in watersheds with significant watershed sensitivity and significant fisheries values, as determined by the district manager and designated environment official

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Timber harvesting or road building in the Klanawn FSW	The Terrain Stability Field Assessment (TSFA) & the
must incorporate the recommendations from the TSFA	windthrow report will be completed by a qualified
and the windthrow report.	professional & the recommendations are measurable.
Timber harvesting and road building will be in	The practice requirements specified in FPPR Sec 55, 56
accordance with the applicable FPPR legislation	& 57 have been adopted as a result/strategy under
regarding stream crossings (Sec 55), fish passage (Sec	this FSP. The result/strategy is therefore measurable
56), and the protection of fish and fish habitat (Sec 57).	or verifiable against the practice requirements and
	consistent with the objective set by government.
Applicable FDUs	2

#### **HLP Order Objective 9 and 9.1- Species Composition**

- 9. When proposing the species composition for the purposes of OPR section 39(3)(o), a person may, pursuant to OPR section 41, select a single species that is ecologically suited to the area, if a mix of species was present on the area before the timber was harvested.
- 9.1 The area that may be subject to selection of a single species pursuant to objective 9 is limited to no more than 20 percent of the forested area of any variant within a given EFZ.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
In Enhanced Forestry Zones (EFZ) #43 & #44, reforestation of all cutblocks will be limited to a maximum of 20% of a single species .	The result or strategy is measurable or verifiable because all planted areas are reported annually as per FPPR S 86(3).
Applicable FDUs	1, 2, 3

#### HLP Order Objectives 15 and 16 - Old Seral and Marbled Murrelet

Objective 15: Retain old growth forests to meet old seral targets and marbled murrelet habitat requirements in the non-contributing (the crown forested land base that does not contribute to the annual allowable cut, but does contribute to biodiversity objectives and targets) landbase to the fullest extent possible.

Objective 16: Beyond retention in the non-contributing land base, retain old forests in the timber harvesting land base, up to the full target amount, if the district manager and the designated environmental official determine that such retention is required to maintain critical marbled murrelet habitat (retention or recruitment of old growth forests will be achieved through the establishment of old growth management areas as part of landscape unit planning)

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Objective 15:To maintain & recruit old growth forests	The result or strategy Objective 15 is addressed under
Objective 16: To maintain marbled murrelet habitat	The Order Establishing Provincial Non-Spatial Old
	Growth Objectives (NSOG) (2004).
	Objective 16 is addressed under Objectives set by
	Government for Wildlife (FPPR 7).
Applicable FDUs	1, 2, 3

# **Objective Set by Government for Soils (FPPR S.5)**

The objective set by government for soils is, without unduly reducing the supply of timber from British Columbia's forests, to conserve the productivity and the hydrologic function of soils.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Timber harvesting and road building will be in	The practice requirements specified in FPPR Sec 35 &
accordance with the applicable FPPR legislation for soil	36 have been adopted as a result/strategy under this

disturbance limits (Sec 35) and permanent access	FSP. The result/strategy is therefore measurable or
structure limits (Sec 36).	verifiable against the practice requirements and
	consistent with the objective set by government.
Applicable FDUs	1, 2, 3

#### **Objectives Set by Government for Wildlife (FPPR S 7)**

- 1. The objective set by government for wildlife is, without unduly reducing the supply of timber from British Columbia's forests, to conserve sufficient wildlife habitat in terms of amount of area, distribution of areas and attributes of those areas, for
  - (a) the survival of species at risk,
  - (b) the survival of regionally important wildlife, and
  - (c) the winter survival of specified ungulate species.
- A person required to prepare a forest stewardship plan must specify a result or a strategy in respect of the objective stated under subsection (1) only if the minister responsible for the Wildlife Act gives notice to the person of the applicable
  - (a) species referred to in subsection (1), and
  - (b) indicators of the amount, distribution and attributes of wildlife habitat described in subsection (1).
- 3. If satisfied that the objective set out in subsection (1) is addressed, in whole or in part, by an objective in relation to a wildlife habitat area or an ungulate winter range, a general wildlife measure, or a wildlife habitat feature, the minister responsible for the Wildlife Act must exempt a person from the obligation to specify a result or strategy in relation to the objective set out in subsection (1) to the extent that the objective is already addressed.
- 4. On or after December 31, 2004, a notice described in subsection (2) must be given at least 4 months before the forest stewardship plan is submitted for approval.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
A detailed survey refers to approved Wildlife Habitat	The area of suitable habitat can be summarized
Areas (WHA) for Marbled Murrelet (MAMU) habitat	annually and measured against the area of suitable
consistent with the Marbled Murrelet Notice	habitat at the time the Marbled Murrelet notice was
(December 30, 2004) with respect to amount,	issued (December 30, 2004).
distribution of habitat class 1, 2 or 3. The amount of	The amount of suitable habitat is verifiable by the
habitat specified in the Notice must first be drawn	marbled murrelet habitat mapping (detailed survey)
down from any suitable habitat in the non-contributing	drawn down firstly by the non-contributing landbase
landbase, then by any suitable habitat within an Old	(the area not available for harvesting) obtained from
Growth Management Area (OGMA), UWR or WHAs.	the most recent Timber Supply Analysis and then by
	suitable habitat within other constrained areas such
	as OGMAs, UWRs and WHAs, all spatially delineated.
Applicable FDUs	1, 2, 3

# Objectives Set by Government for Water, Fish, Wildlife and Biodiversity Within Riparian Areas (FPPR S. 8)

The objective set by government for water, fish, wildlife and biodiversity within riparian areas is, without unduly reducing the supply of timber from British Columbia's forests, to conserve, at the landscape level, the water quality, fish habitat, wildlife habitat and biodiversity associated with those riparian areas

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
The FSP Holder(s) will adopt as practice requirements the riparian classifications and management widths for streams, wetlands and lakes. There is no varying of management within the specified widths unless a written rationale is prepared by a qualified professional who must consider the Riparian Factors in Schedule 1 of the FPPR relating to ensuring water quality or fish habitat is maintained.	The establishment of riparian reserves, riparian widths and management areas are measurable against the practice requirements under FPPR S. 47-53. If the FSP Holder(s) do not consider the practice requirements to be a good management strategy, the written rationale based on the Factors listed in Schedule 1 are measurable and verifiable.
Applicable FDUs	1, 2, 3

#### Objectives Set by Government for Water in Community Watersheds (FPPR S. 8.2)

The Sugsaw Community Watershed was designated on July 16, 1999

#### **Result or Strategy Summary** Is the Result or Strategy Measurable or Verifiable? The DRAFT report titled "Sugsaw Lake Community HFN will adopt the practice requirements under FPPR Watershed Assessment" was completed in December Section 59 (protect water quality), 60 (licensed water 2015. The report, prepared by a Qualified works) and 61 (sediment delivery) which commits to Professional, measures and details the required ensuring that material or sediment that is harmful to environmental indicators including but not limited to human health is not deposited in, or transported to, ECA %, road density and mass wasting potential. water diverted for human consumption by a licenced These environmental indicators are considered by waterworks. In addition, Section 60 requires HFN not government as an effective and verifiable strategy to damage a license waterworks or harvest timber or (CWAP Guidebook 1999) to manage risks of construct a road within a 100 metre radius. cumulative hydrological effects of road construction and cutblock harvesting that could result in a material HFN commits to have a qualified professional complete adverse impact on water quality and quantity. or update a Watershed Assessment within the Community Watershed portion of the landbase. The report takes into consideration several water quality and quantity factors related to harvesting and road building. The results and recommendations of the report are incorporated into forest practices unless a variance to the recommendations are supported by a rationale written by a qualified professional. Applicable FDUs

# Objectives Set by Government for Wildlife and Biodiversity-landscape level (FPPR S. 9)

The objective set by government for wildlife and biodiversity at the landscape level is, without unduly reducing the supply of timber from British Columbia's forests and to the extent practicable, to design areas on which timber harvesting is to be carried out that resemble, both spatially and temporally, the patterns of natural disturbance that occur within the landscape.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
The FSP Holder(s) will adopt as practice requirements under FPPR 64 & 65 relating to a maximum cutblock and adjacency.	The practice requirements are considered measurable and verifiable.
Applicable FDUs	1, 2, 3

# Objectives Set by Government for Wildlife and Biodiversity – Stand Level (FPPR S 9.1)

The objective set by government for wildlife and biodiversity at the stand level is, without unduly reducing the supply of timber from British Columbia's forests, to retain wildlife trees.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
The result or strategy defines a wildlife tree and a	The practice requirements are considered measurable
Wildlife Tree Retention Area and states the minimum	and verifiable.
area required to be retained at a stand level.	
The FSP Holder(s) will adopt practice requirements	
under FPPR 66 & 67 relating to a wildlife tree retention.	
Applicable FDUs	1, 2, 3

# Objectives Set by Government for Visual Quality (FPPR S.9.2)

#### Objectives set by Order to Establish Visual Quality Objectives for the South Island Forest District

Pursuant to Section 7(2) of the Government Actions Regulation (GAR), I, Calvin Ross, A/District Manager for the South Island Forest District, establish and amend Visual Quality Objectives (VQOs) for the South Island Forest District as shown on the attached map titled South Island Forest District, Visual Quality Objectives, Travel Corridors and associated Scenic Areas for the South Island Natural Resource District as shown on the attached map titled South Island Forest District, Visual Quality Objectives Established Under Section 7(2) GAR order Amendment Map, dated December 14, 2011. This order is effective on December 30, 2011.

Result or Strategy Summary	Are the Results or Strategies Measurable or
	Verifiable?
The cutblock design will meet the applicable Visual	The results or strategies detailed in the FSP commit to
Quality Objectives (VQO) established by the District	meeting the VQO by retaining a qualified professional
Manager as per GAR s 7(2).	to complete the Visual Impact Assessment (VIA) prior
	to harvest. In the event that wind, fire or pests make
	it not practicable to meet the VQO, the FSP details
	strategies to address the damage timber and to
	minimize the impact of the visual resource value.

Applicable FDUs 1, 2, 3

# **Objectives Set by Government for Cultural Heritage Resources (FPPR S. 10)**

The objective set by government for cultural heritage resources is to conserve, or, if necessary, protect cultural heritage resources that are:

- (a) the focus of a traditional use by an aboriginal people that is of continuing importance to that people, and
- (b) not regulated under the Heritage Conservation Act.

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Once annually, the FSP Holder(s) will refer all areas of potential timber harvesting and road construction to the affected First Nations.  The FSP Holder(s) must reasonable effort is made to share information or consult with the applicable FN regarding a possible special cultural heritage resource (CHR)	Information sharing is provided to all the Maa-Nulth Treaty Nations in the form of a map outlining proposed cutblocks and roads. All correspondence is documented in the HFN Information Sharing Log
If the special cultural heritage resource is confirmed, the FSP Holder(s) must identify the area occupied by the CHR, nature of the CHR and whether it is to be conserved and the steps taken if a previously unidentified CHR is encountered	This is a verifiable process of seeking information, confirming whether action is required, conducting assessments where required, reviewing options and implementing options
The FSP Holder(s) commit to reforesting Cw & Cy where ecologically suitable.	The commitment to reforest Cw & Cy where ecologically suitable is easily measured by total stems of Cw &/or Cy planted.
Applicable FDUs	1, 2, 3

# Objective Set by Order- Ungulate Winter Range #u1-013 & Wildlife Habitat Area (MAMU) #1-028

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
Very specific activities are permitted within legally protected Ungulate Winter Ranges (UWR) or Wildlife Habitat Areas (WHA) eg. Salvage from blowdown, windfirming etc. as per the individual Orders.	The result or strategy outlines the specific activities permitted within the mapped areas.
Applicable FDUs	2

# **Stocking Standards**

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
The stocking standards found in the Appendix 1 of the FSP specify the regeneration date, free growing date, free growing height and stocking standards for the CWHvm1, CWHvm2 and CWHvh1.	The stocking standards are based on the Vancouver Forest Region Reference Guide for FSP Stocking Standards (November 2010)  No changes from Amendment #3 (re: the inclusion of the CWHvh1 into the Stocking Standards) have been requested.
Applicable FDUs	1, 2, 3

# **Measures to Prevent the Introduction and Spread of Invasive Plants**

#### FPPR s.17

For the purpose of section 47 [invasive plants] of the Act, a person who prepares a forest stewardship plan must specify measures in the plan to prevent the introduction or spread of species of plants that are invasive plants under the Invasive Plants Regulation, if the introduction or spread is likely to be the result of the person's forest practices

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
HFN commits to confirming the known location of invasive plant species and outlines the measures required to prevent the spread or introduction of invasive plant species if the spread or introduction is a result of HFN's forest practices.	The measures are consistent with best practices for preventing the introduction and spread of invasive plants.
Applicable FDUs	1, 2, 3

# **Measures Related to Natural Range Barriers**

Result or Strategy Summary	Is the Result or Strategy Measurable or Verifiable?
No results or strategies have been included.	Not applicable to the landbase. There are no agreements under the Range Act in the vicinity of the FDUs.
Applicable FDUs	NONE