Southern interior Frgest Region
515 Columbia Stree
Kamloops. British Columbia
Ministry of
Forests and Range

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To: District Managers
Southern Interior Forest Region
From: T.P. (Phil) Zacharatos, RPF
Regional Executive Director
Southorn Interior Forest Region

## Re: Revised Maximum Density Number for Lodgepole Pine

The purpose of thas memo is to dulvise you of my decision around this issue and the reasons that led me to where I landed before I olficially release the decision within the next couple of days.

The decision process for revising the Maximum Density Number for Lodgepole pine has been on-going now for some time. The tirst proposal was subnitted to Fred Baxter as the Regional Manager of the Kamloops forest Region prior to the amalgamation of the regions. That first proposal was denied on the grounds that there was missing detail in order to assess the potential impacts of the revision. The licensee has submitted additional infomation to support their proposal, plus the licensees from the old Cariboo Forest Region have atso submitted a proposal to revise the number for pine for the Willians Lake and too Mite House TSAs.

The process to revien these two proposals has gone through many stages including formal opportunty to be heard sessions, field tours by both industry and ministry along with additonal presentations from topic experts. The proposal from Weycrhacuser requested at max density number of 30,000 countable stems per heclare ulilicing the existing countable height rules. The Cariboo proposal requested a density of 25.000 countable per hectare, but they also requested that the 2 meter requirencot on the $50 \%$ combable beight rule be dropped As the Regional Executive Director, I can only make a decision on the max density mumber itselt, the countabie height rule falls under the purview of the (hief Forester"s olitec. As a result of the above presentations and discussions with ministry stalT. I have decided to set the "Maximum Densily for Lodgepole pine in the Southern Interior Forest Region" at 25,000 countable stems per hectare. All other species will remain at the current standard of 10,000 countathle stems per hectare.

As you can appreciate this issuc is complex and one that has been the subject of on-going debate for years. Having said this, there have been numerous factors considered in coming to this decision to revisc the number, the key ones of which are listed below:

Magnitude of the Issue: This concern kept coming forward as I dealt with this. How moch area are we actually talking about and how much staff time is being taken up dealing with the administration of it. From the presentations I have received, it appears to affect less 1 han $2 \%$ of the areas regenerated, some TSAs may be slightly higher, but overall it is a very small amount of area.

Maximum Density vs Repression: The question of where repression, or the loss of height growth sets in is very complicated. I received several presentations from industry, consultants and Rescarch Branch stafl. vicwed density trials in the field and walked through many younger high density stands. Maximum density and repression should not be conlused with each oher. The original max density number was set based on earlier modeling and analysis that sought to sel mimmum acceptable piece sizes. Industry presentations using the Rescarch Branch's growth and yield model TASS/TIPSY indicate that their higher value products such as MSR stress rated lumber with smaller knot sizes is still achievable when densities are in excess of the current 10,000 max density number. In addition, the results from the Research Branch's density trials indicates that the threshold for repression on the sites they tested are much higher than was originally thought. Some concern was expressed to me by staff that on the drier low site index sites in the Cariboo, competition for moisture and nutrients may cause repression at lower densities than expericuced on the Research Branch Trial site. Therefore I have supported my staff and the licensees in establishing a set of long term measurement plots across a range of post harvest regeneration high density stands. Results from these plots and Rescarch's trials will hopefully identify the number where repression sets in for a range of siles.

TSR F.ffects: Post Mountain Pine Beetle, many management units will be in a serious timber shortall situation. The merchantable volumes per hectare and when they come on line to support the AC will be critical to support timber supply through the mid-tem ( $15-60 y e a r s$ ). Too high a residual density could lower the merchantable volumes or extend the rotation until the minimum merchantable volumes are available. Of equal importance is the lower density limit, too few stems established can also reduce merchantable volumes as well as seriously impact stem form, branch diameter and resulting wood quality. Management unit specific strategies should be developed that take into account the impacts that high and very low densitics have on wood supply through the mid and long term harvest periods.

Forest Health: During the MPB epidemic, our Forest Health experts are recommending against spacing of Lodgepole pine as the increase in diameter growth makes them susceptible to attach from MPB. plus the recently cut spacing slash attracts Ipps beetle. A developing lpps population can attack the remaining crop trees resulting in NSR ol low stocking areas. Pine managenent should be avoided for at least 3 years after the mountain pine beetle (MPB) population has collapsed.

Incremental Silviculture Investments: Post MPB investments such as fertilization of Lodgepole pine may have a positive effect in helping to mitigate the mid term fall down by stimulating additional volume growth. Silviculture Strategics should be utilized to target the
appropriate stands and timing to yield the additional volume when it is needed. Very high densities will not efficiently utilize the fertilizer additions. this consideration should be included in the Silviculture Strategies.

The decision to increase the maximum density for Lodgepole pine has been a long and complicated process. It is timely now to get a revised number on there as a significant number of licensees are working towards the submission of their FSPS and I wanted to be able to provide them with enough lead time to be able to include this revised number in their plans The region received proposals for two different numbers but following discussions with stall' 1 decided in order to maintain consistency and to be on the conservative side. set one number at 25,000 .

I accept that some may quarrel with my decision (both within and outside of our organization), but at the end of the day I weighed all of the evidence and information that was put before me and reached a conclusion that I think is balanced and reflective of a careful and fair evaluation of all of that information.

If you have any questions. comments, concerns, etc. please fee fred to give me a shout.

T.P. (Phil) Zacharatos, RPF

Regional Executive Director
Southern Interior Forest Region

pe: Jim Snetsinger. Chief Forester, Prime George, BC Henry Benskin, A Deputy Chicí Forester, Victoria, BC Bill Warmer, RED, Norther Interior Forest Region, Prince George, BC<br>Cindy Stem. RED, Coast Forest Region, Nanaimo. BC<br>Ralph Winter. Stand Mgmt Officer. Victoria, BC<br>l. one Bedford. Mgr. Harvesting and Silviculture Practices. Victoria, BC<br>Jim Goudic, Biometrician. Growth \& Yield, Victoria, BC<br>Guy New some, Silviculture Practices Forester, Southern Interior Forest Region


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