

**BRITISH COLUMBIA  
MINISTRY OF FORESTS LANDS AND  
NATURAL RESOURCE OPERATIONS**

# **Invermere Timber Supply Area**

**Rationale for  
Allowable Annual Cut (AAC)  
Determination**

**Effective June 29, 2017**

**Diane Nicholls, RPF  
Chief Forester**

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**Objective of this document**

This document provides an accounting of the factors I have considered and the rationale I have employed in making my determination, under Section 8 of the *Forest Act*, of the allowable annual cut (AAC) for the Invermere Timber Supply Area (TSA). This document also identifies where new or better information is needed for incorporation in future determinations.

**Acknowledgement**

For preparation of the information I have considered in this determination, I am indebted to staff of the BC Ministry of Forests, Lands and Natural Resource Operations (FLNRO) in the Rocky Mountain Natural Resource District, and the Forest Analysis and Inventory Branch (FAIB). I am also grateful to local residents, First Nations, and stakeholders who contributed to this process.

## Statutory framework

Section 8 of the *Forest Act* requires the chief forester to consider a number of specified factors in determining AACs for TSAs and TFLs. Section 8 of the *Forest Act* is reproduced in full as Appendix 1 of this document.

## Description of the Invermere Timber Supply Area

The Invermere Timber Supply Area (TSA) is situated in the south-eastern corner of British Columbia within the Kootenay-Boundary Natural Resource Region - Rocky Mountain Natural Resource District (“district”) and is administered out of the district office in Cranbrook. Occupying a total area of about 1.32 million hectares, of which about 151 000 hectares are attributable to TFL14, the TSA is bounded by the Cranbrook TSA to the south, the Golden TSA to the north, the Rocky Mountains and Alberta border to the east, and the Purcell Mountains to the west. Between these two mountain ranges lies the Rocky Mountain Trench, a broad, flat valley with numerous rivers and wetlands. The Columbia River flows north through the trench from Columbia Lake, creating a large, complex wetland ecosystem called the Columbia Wetlands.

The TSA includes one national park (Kootenay National Park) and eleven provincial parks: Mount Assiniboine, Height of the Rockies, Top of the World, Purcell Wilderness Conservancy, Bugaboo Glacier, Windermere Lake, White Swan Lake, Premier Lake, Canal Flats, James Chabot, and Dry Gultch Provincial Parks.

According to the 2011 Canadian Census, the total population of the TSA is about 8900 of which slightly more than half live in the major population centres of Invermere, Windermere, Canal Flats and Radium Hot Springs. The remainder live in the smaller rural communities of Wilmer, Fairmont Hot Springs, Edgewater and Parsons along the Highway 93/95 corridor.

The member bands of three First Nation Councils: the Ktunaxa Nation Council (KNC); the Shuswap Nation Tribal Council (SNTC); and, the Okanagan Nation Alliance (ONA) have territories that encompass areas within the Invermere TSA. The ?Akisq’nuq First Nation (Columbia Lake Indian Band), who is a member of the KNC, has a community located at Windermere. The Shuswap Indian Band, who is a member of the SNTC, has a community located at Invermere. There are no ONA member band communities within the TSA; however, the Okanagan Indian Band’s territory encompasses a very small area in the extreme north-western portion of the TSA.

According to the 2006 economic dependency estimates provided by BC STATS the main sources of employment in the Rocky Mountain Resource District are the public sector (27 percent), tourism (23 percent), mining (16 percent), construction (14 percent) and forestry (12 percent). Since then, employment in the timber-processing sector has decreased. The largest decrease was due to the closure of Canfor’s Canal Flats sawmill in 2015.

The Kootenay-Boundary Higher Level Plan Order, which came into effect October 2002, provides legal land use direction for the Invermere TSA. The order established resource management objectives for: biodiversity, old and mature forest, caribou, green-up, grizzly bear and connectivity corridors, consumptive use streams, enhanced resource development zones for timber, fire-maintained ecosystems, visual quality, and social and economic stability. Forest licensees are legally required to prepare Forest Stewardship Plans that meet these objectives.

The diverse landscapes in the TSA provide habitat for a wide range of wildlife species. Ungulate winter ranges have been established for the protection of white-tailed deer, mule deer, moose, elk, bighorn sheep and mountain goat habitat. In addition, wildlife habitat areas with general wildlife measures have been established for Rocky Mountain Tailed Frog, Long Billed Curlew, Flammulated

Owl, Lewis's Woodpecker, Badger, Williamson's Sapsucker, Western Screech Owl, Antelope Brush/Bluebunch Wheatgrass, Douglas-fir/Snowberry/Balsam Root and Gillette's Checkerspot.

The Invermere TSA offers many and varied opportunities for recreation and tourism, due to its lakes, parks and spectacular mountains. The area provides a wide range of front- and back-country recreational opportunities including mountain biking, hiking, climbing, fishing, camping, wildlife viewing, white-water boating, heli-skiing, snowmobiling, ski mountaineering, cross country skiing, and downhill skiing. The TSA also contains significant water resources. Numerous watersheds are classified as either domestic or community watersheds.

## **History of the AAC for the Invermere TSA**

In 1981, the AAC for the Invermere TSA was set at 670 000 cubic metres. The AAC was temporarily increased to 1.8 million cubic metres for two years in 1985 to provide for the salvage of timber burned in the 1985 wildfires. In 1986, following the transfer of land from the Cranbrook TSA, the AAC for the Invermere TSA was increased to 696 190 cubic metres.

In 1989, a temporary increase of 40 000 cubic metres for the harvest of small-diameter lodgepole pine stands was set for a three-year period, bringing the AAC to 736 140 cubic metres. The transfer of land from the Invermere TSA to TFL 14 and the establishment of the Height of the Rockies Provincial Park resulted in a decrease in the AAC to 697 264 cubic metres effective January 1, 1990. The temporary increase for small diameter pine was extended, but failed to attract licensee interest and the AAC was subsequently reduced to 657 264 cubic metres effective January 1, 1994.

The AAC was decreased to 591 500 cubic metres in 1996 and further decreased to 581 570 cubic metres in 2001. In 2005, the AAC was increased by 17 000 cubic metres to 598 570 cubic metres. Although the AAC was not partitioned, the chief forester indicated that 5000 cubic metres of the increase was for the restoration of fire-maintained ecosystems and 12 000 cubic metres was for small scale salvage. On September 30, 2008 the chief forester issued an order under Section 8.3 of the *Forest Act* postponing the determination of a new AAC.

After accounting for area-based tenures issued since the AAC was determined in 2005, the AAC in effect at the time of this determination – referred to throughout this document as the “current AAC” - is 595 186 cubic metres.

## **New AAC determination**

Effective June 29, 2017 the new AAC for the Invermere TSA is as follows:

- From June 29, 2017 to June 29, 2022, the AAC is 496 720 cubic metres; and,
- From June 30, 2022 the AAC is 424 800 cubic metres.

This AAC will remain in effect until a new AAC is determined, which must take place within 10 years of this determination.

## **Information sources used in the AAC determination**

The information sources considered in determining this AAC for the Invermere TSA include but are not limited to, the following:

*Biodiversity Guidebook*, Province of BC, 1995.

*Kootenay-Boundary Higher Level Plan Order*. BC Ministry of Sustainable Resource Management, October 2002, and variances.

*Kootenay-Boundary Land Use Plan Implementation Strategy*, Kootenay Inter-Agency Management Committee, 1997.

*Southern Rocky Mountain Management Plan*, BC Ministry of Sustainable Resource Management, 2003.

*Invermere Timber Supply Area Timber Supply Review Data Package*, FLNO, FAIB, October 2015.

*Invermere Timber Supply Discussion Paper*, FLNO, FAIB, July 2015.

*Invermere TSA Inventory Audit*, Ministry of Forests Resource Inventory Branch, 1999.

Letter from the Minister of Forests to the chief forester, dated July 4, 2006 and October 27, 2010, stating the Crown's economic and social objectives for the province.

Letter from the Regional Ecologist to the Director FAIB, June 3, 2015 approving the use of the SIBEC and PEM estimates for use in the TSR.

*Riparian Management Area Classification for Cranbrook Forest District*, GeoSense, March 1998.

*Cranbrook Forest District Problem Forest Type Summary Report*, BC Ministry of Forests, July 1998.

*Identified Wildlife Management Strategy*, Volume 1, Province of BC, February 1999.

*Forest and Range Practices Act 2002 and Amendments*.

*Forest Practices Code of British Columbia Act Regulations and Amendments*, consolidated to June 1999.

*Cranbrook TSA Rationale for AAC Determination*, January 7, 2004.

*Landscape Unit Planning Guide*, 2000.

*Identified Wildlife Management Strategy, Procedures for Managing Identified Wildlife*, Version 2004.

Roads, Trails and Landings Inventory Project within the Invermere Timber Supply Area, Timberline Natural Resource Group, March 15, 2008.

B.C. Ministry of Forests. 1998. Procedures for Factoring Visual Resources into Timber Supply Analyses. Timber Supply Branch.

B.C. Ministry of Forests. 2000. Timber Supply Review, Invermere Timber Supply Area Data Package. Timber Supply Branch.

B.C. Ministry of Forests. 2000. Timber Supply Review, Invermere Timber Supply Area Analysis Report. Timber Supply Branch.

BC Ministry of Forests (March 2003) BC Heartlands Economic Strategy - The Forestry Revitalization Plan.

British Columbia. 2014. *Forest Act*. See Section 8 Allowable annual cut  
[www.bclaws.ca/civix/document/id/complete/statreg/96157\\_02](http://www.bclaws.ca/civix/document/id/complete/statreg/96157_02)

British Columbia. 2014. *Forest and Range Practices Act*. See  
[www.bclaws.ca/civix/document/id/complete/statreg/02069\\_01](http://www.bclaws.ca/civix/document/id/complete/statreg/02069_01)

British Columbia. 2014. Forest Planning and Practices Regulation. See  
[www.bclaws.ca/civix/document/id/complete/statreg/14\\_2004](http://www.bclaws.ca/civix/document/id/complete/statreg/14_2004)

British Columbia. 2014. Government Actions Regulation. See  
[www.bclaws.ca/civix/document/id/complete/statreg/582\\_2004](http://www.bclaws.ca/civix/document/id/complete/statreg/582_2004)

Chen, H. and A. Walton. 2015. *Monitoring harvest activity across 28 mountain pine beetle-impacted management units*. Forest Analysis and Inventory Branch, Ministry of Forests, Lands and Natural Resource Operations, Victoria BC.

Ministry of Environment. Identified Wildlife Management Strategy. See  
[www.env.gov.bc.ca/wld/frpa/iwms/index.html](http://www.env.gov.bc.ca/wld/frpa/iwms/index.html)

Ministry of Environment. BC Species and Ecosystems Explorer. See <http://a100.gov.bc.ca/pub/eswp/>

Ministry of Environment. Mountain Caribou Recovery. See  
[www.env.gov.bc.ca/wld/speciesconservation/mc/index.html](http://www.env.gov.bc.ca/wld/speciesconservation/mc/index.html)

Ministry of Environment. Ungulate winter ranges. See [www.env.gov.bc.ca/wld/frpa/uwr/](http://www.env.gov.bc.ca/wld/frpa/uwr/)

Ministry of Forests. 1995. *Biodiversity guidebook*. See  
[www.for.gov.bc.ca/tasb/legsregs/fpc/fpcguide/biodiv/biotoc.htm](http://www.for.gov.bc.ca/tasb/legsregs/fpc/fpcguide/biodiv/biotoc.htm)

Ministry of Forests. 2009. Variable density yield projection. Volume 1 – VDYP7 Overview Version 2.0. Forest Analysis and Inventory Branch, Victoria, BC.

Ministry of Forests, Lands and Natural Resource Operations. Provincial-level projection of the current mountain pine beetle outbreak. See [www.for.gov.bc.ca/hre/bcmpb/year12.htm](http://www.for.gov.bc.ca/hre/bcmpb/year12.htm)

Ministry of Forests, Lands and Natural Resource Operations. Harvest Billing System (HBS). See  
[www.for.gov.bc.ca/hva/hbs/](http://www.for.gov.bc.ca/hva/hbs/)

Ministry of Forests, Lands and Natural Resource Operations. Wildlife Management Areas. See  
[www.env.gov.bc.ca/fw/habitat/conservation-lands/wma/](http://www.env.gov.bc.ca/fw/habitat/conservation-lands/wma/)

Ministry of Forests, Lands and Natural Resource Operations. Archaeology in British Columbia. See  
[www.for.gov.bc.ca/archaeology/index.htm](http://www.for.gov.bc.ca/archaeology/index.htm)

Ministry of Forests, Lands and Natural Resource Operations. 2015. *Invermere Timber Supply Area Timber Supply Review Data Package*. May 2016. Victoria, BC.

Ministry of Forests, Lands and Natural Resource Operations. 2015. *Invermere Timber Supply Area Timber Supply Analysis Discussion Paper*. September 2016. Victoria, BC.

## **Role and limitations of the technical information used**

Section 8 of the *Forest Act* requires the chief forester, in determining AACs, to consider biophysical, social and economic information. Most of the technical information used in determinations is in the form of a timber supply analysis and its inputs. These inputs are concerned primarily with biophysical factors—such as the rate of timber growth and the definition of the land base considered available for timber harvesting—and with management practices.

The analytical techniques used to assess timber supply necessarily are simplifications of the real world. Many of the factors used as inputs to timber supply analysis are uncertain, due in part to variation in physical, biological and social conditions. Ongoing scientific studies of ecological dynamics will help reduce some of this uncertainty.

Furthermore, computer models cannot incorporate all of the social, cultural and economic factors that are relevant when making forest management decisions. Technical information and analysis, therefore, do not necessarily provide the complete answers or solutions to forest management decisions such as AAC determinations. Such information does provide valuable insight into potential impacts of different resource-use assumptions and actions, and thus forms an important component of the information I must consider in AAC determinations.

In determining this AAC for the Invermere TSA I have considered the known limitations of the technical information provided. I am satisfied that the information provides a suitable basis for my determination.

## **Guiding principles for AAC determinations**

Section 8 of the *Forest Act* requires the chief forester to consider particular factors in determining the AACs for timber supply areas and tree farm licences.

Given the large number of periodic AAC determinations required for British Columbia's many forest management units, administrative fairness requires a reasonable degree of consistency of approach in addressing relevant factors associated with AAC determinations. In order to make my approach in these matters explicit, I have considered and adopted the following body of guiding principles, which have been developed over time by BC's chief foresters and deputy chief foresters. However, in any specific circumstance in a determination where I consider it necessary to deviate from these principles, I will explain my reasoning in detail.

When considering the factors required under Section 8, I am also mindful of my obligation as a steward of the forests of British Columbia, of the mandate of the FLNRO as set out in Section 4 of the *Ministry of Forests and Range Act*, and of my responsibilities under the *Forest Act* and *Forest and Range Practices Act* (FRPA).

### Integrated decision making

One of the key purposes of the FLNRO is to plan the use of forest and range resources such that the various natural resource values are coordinated and integrated. In addressing the factors outlined in Section 8 of the *Forest Act*, I will consider all available information on timber and non-timber resources in the management unit, and all available information on the interactions of the management of those resources on timber supply.



### Information uncertainty

Given the complex and dynamic nature of forest ecosystems coupled with changes in resource use patterns and social priorities there is always a degree of uncertainty in the information used in AAC determinations.

Two important ways of dealing with this uncertainty are:

- i) managing risks by evaluating the significance of specific uncertainties associated with the current information and assessing the various potential current and future, social, economic, and environmental risks associated with a range of possible AACs; and
- ii) re-determining AACs frequently, in cases where projections of short-term timber supply are not stable, to ensure they incorporate current information and knowledge.

In considering the various factors that Section 8 of the *Forest Act* requires the chief forester to take into account in determining AACs, it is important to reflect those factors, as closely as possible, that are a reasonable extrapolation of current practices. It is not appropriate to base decisions on proposed or potential practices that could affect the timber supply but are not substantiated by demonstrated performance or are beyond current legal requirements.

In many areas, the timber supply implications of some legislative provisions remain uncertain, particularly when considered in combination with other factors. In each AAC determination, this uncertainty is taken into account to the extent possible in the context of the best available information.

It is not appropriate to speculate on timber supply impacts that may eventually result from land-use decisions not yet finalized by government, nor is it possible at this time to speculate about the possible effect on timber supply that could result from possible eventual legal proof of Aboriginal title. However, where specific protected areas, conservancies, or similar areas have been designated by legislation or by order in council, these areas are deducted from the timber harvesting land base (THLB) and are not considered to contribute any harvestable volume to the timber supply in AAC determinations, although they may contribute indirectly by providing forest cover to help in meeting resource management objectives such as for biodiversity.

In some cases, even when government has made a formal land-use decision, it is not necessarily possible to fully analyse and account for the consequent timber supply impacts in a current AAC determination. Many government land-use decisions must be followed by detailed implementation decisions requiring, for instance, further detailed planning or legal designations such as those provided for under the *Land Act* and FRPA. In cases where there is a clear intent by government to implement these decisions that have not yet been finalized, I will consider information that is relevant to the decision in a manner that is appropriate to the circumstance. The requirement for regular AAC reviews will ensure that future determinations address ongoing plan implementation decisions.

Where appropriate, information will be considered regarding the types and extent of planned and implemented silviculture practices as well as relevant scientific, empirical and analytical evidence on the likely magnitude and timing of their timber supply effects.

I acknowledge the perspective that alternate strategies for dealing with information uncertainty are to delay AAC determinations or to generally reduce AACs in the interest of caution. However, given that there will always be uncertainty in information, and due to the significant impacts that AAC

determinations can have on communities, I believe that no responsible AAC determination can be made solely on the basis of a response to uncertainty.

Nevertheless, in making a determination, allowances may need to be made to address risks that arise because of uncertainty by applying judgment to the available information. Where appropriate, the social and economic interests of the government, as articulated by the Minister of Forests, Lands and Natural Resource Operations, can assist in evaluating this uncertainty.

### Climate change

One key area of uncertainty relates to climate change. While some controversy appears to remain on the causes of climate change, there is substantial scientific agreement that climate is changing, that the changes will affect forest ecosystems, and that forest management practices will need to be adapted. Nevertheless, the potential rate, amount, and specific characteristics of climate change in different parts of the province are uncertain. As research provides more definitive information on climate change, I will consider the findings in AAC determinations. Where forest practices are implemented to mitigate or adapt to the potential effects of climate change on forest resources, I will consider related information in my determinations.

In addition, vulnerability assessments can provide information on the potential risks associated with climate change, and could be useful in defining how to consider climate change in different AAC determinations. Such assessments could also highlight key topics in need of research that could improve climate change considerations for future determinations.

I note, however, that even with better information on climate change there will be a range of reasonable management responses. Considerations of how to respond in anticipation of uncertain, potential future impacts and risks differ from those related to responding to known or ongoing processes such as the recent mountain pine beetle (MPB) infestation. For example, it is not clear if either increases or decreases to current harvest levels would be appropriate in addressing potential future increases in natural disturbance due to climate change. Conversely, the present forest conditions resulting from the MPB infestation provide a clearer circumstance to which to respond.

To some extent, decisions on the preferred management responses to potential future risks, including potential changes to allowable timber harvests, are appropriately informed by broad discussion among interested parties. I will monitor such discussions and consider them insofar as they are relevant to AAC determinations. In general, the requirement for regular AAC reviews will allow for the incorporation of new information on climate change and its effects on forests and timber supply as it emerges.

### First Nations

Established (declared) Aboriginal title lands and other areas, such as Treaty Settlement Lands or Indian Reserves, are not provincial Crown land. Consequently, the timber on these lands does not contribute to the AAC of the timber supply area or tree farm licence with which they overlap. For other areas, where Aboriginal title has not been legally proven, the Crown has a constitutional obligation to consult with First Nations regarding their asserted Aboriginal rights and title (Aboriginal Interests) in a manner proportional to the strength of their Aboriginal Interests and the degree to which the decision may impact these interests. In this regard, full consideration will be given to:

- (i) the information provided to First Nations to explain the timber supply review process;
- (ii) any information brought forward through engagement and consultation respecting First Nations' Treaty rights or Aboriginal Interests, including how these rights or interests may be impacted; and
- (iii) any operational plans and/or other information that describe how First Nations' Treaty rights or Aboriginal Interests are addressed through specific actions and forest practices.

Treaty rights or Aboriginal Interests that may be impacted by AAC decisions will be addressed consistent with the scope of authority granted to the chief forester under Section 8 of the *Forest Act*. When information is brought forward that is outside of the chief forester's scope of statutory authority, this information will be forwarded to the appropriate decision makers for their consideration. Specific considerations identified by First Nations in relation to their Aboriginal Interests and the AAC determination are addressed in the various sections of this rationale.

AAC determinations should not be construed as limiting the Crown's obligations under court decisions in any way, and in this respect it should be noted that AAC determinations do not prescribe a particular plan of harvesting activity within the management units. They are also independent of any decisions by the Minister of Forests, Lands and Natural Resource Operations with respect to subsequent allocation of wood supply.

### **The role of the base case**

In considering the factors required under Section 8 of the *Forest Act* to be addressed in AAC determinations, I am assisted by timber supply forecasts provided to me through the work of the Timber Supply Review Program (TSR) for TSAs and TFLs.

For most AAC determinations, a timber supply analysis is carried out using an information package including data and information from three categories: land base inventory, timber growth and yield, and management practices. Using this set of data and a computer model, a series of timber supply forecasts can be produced to reflect different starting harvest levels, rates of decline or increase, and potential trade-offs between short- and long-term harvest levels.

From a range of possible forecasts, one is chosen in which an attempt is made to avoid both excessive changes from decade to decade and significant timber shortages in the future, while ensuring the long-term productivity of forest lands. This is known as the *base case* forecast and forms the basis for comparison when assessing the effects of uncertainty on timber supply. The base case is designed to reflect current management practices, demonstrated performance and legal requirements.

Because it represents only one in a number of theoretical forecasts, and because it incorporates information about which there may be some uncertainty, the base case is not an AAC recommendation. Rather, it is one possible forecast of timber supply, whose validity - as with all the other forecasts provided - depends on the validity of the data and assumptions incorporated into the computer model used to generate it.

Therefore, much of what follows in the considerations outlined below is an examination of the degree to which all the assumptions made in generating the base case are realistic and current, and the degree to which resulting predictions of timber supply must be adjusted to more properly reflect the current and foreseeable situation.

These adjustments are made on the basis of informed judgment using currently available information about forest management, and that information may well have changed since the original information package was assembled. Forest management data are particularly subject to change during periods of legislative or regulatory change, or during the implementation of new policies, procedures, guidelines or plans.

Thus, in reviewing the considerations that lead to the AAC determination, it is important to remember that the AAC determination itself is not simply a calculation. Even though the timber supply analysis I am provided is integral to those considerations, the AAC determination is a synthesis of judgment and analysis in which numerous risks and uncertainties are weighed. Depending upon the outcome of these considerations, the AAC determined may or may not coincide with the base case. Judgments that in part may be based on uncertain information are essentially qualitative in nature and, as such, are subject to an element of risk. Consequently, once an AAC has been determined, no additional precision or validation would be gained by attempting a computer analysis of the combined considerations.

### **Base case for the Invermere TSA**

The timber supply forecasts, including the base case, were prepared for this determination using Remsoft's Woodstock software. The data and assumptions used in the base case are intended to reflect current legal requirements, the best available information, demonstrated forest management practices and current conditions in the Invermere TSA as documented in the data package, as updated May 2016.

Harvest level projections, even those prepared using the same information, data and timber supply model, are dependent on the harvest priorities used in the analysis. The harvest priorities used in preparing the base case for this determination include:

- first, harvest stands composed of at least 50 percent pine to reflect ongoing MPB salvage;
- second, harvest open forest and open range for ecosystem restoration purposes; and
- finally, harvest the oldest stands first.

The Minister of Forests and Range, in a letter dated October 27, 2010 provided the Crown's objectives with respect to mid-term timber supply in areas affected by the mountain pine beetle (MPB). Direction was provided to mitigate mid-term timber supply shortfalls to support the wellbeing of forest-dependent cities and towns. It is for this reason the base case is modelled as a sustained harvest level that maintains the highest possible mid-term level.

The impact of MPB was not modelled in the base case as the infestation has now subsided. The licensees have promptly harvested infested stands which further helped to reduce the spread of the infestation. Any remaining minor damage to stands is accounted for in the yield projections.

The base case begins in 2014 and maintains a harvest level of 447 158 cubic metres per year through the entire 100-year forecast. This level is 25 percent lower than the current AAC. In addition to the base case, I was provided with a number of sensitivity analyses and alternative harvest forecasts carried out using the base case as a reference. These analyses and others as noted have been helpful in specific considerations and reasoning in my determination as documented in the following sections.

I am satisfied that the base case, and the other analyses as noted and described, represent the best information currently available to me regarding the various aspects of the projection of the timber

supply in this TSA, and that as such they are suitable for reference in my considerations in this determination.

### **Consideration of Factors as Required by Section 8 of the *Forest Act***

I have reviewed the information for all of the factors required to be considered under Section 8 of the *Forest Act*. Where I have concluded that the modelling of a factor in the base case is a reasonable reflection of current legal requirements, demonstrated forest management and the best available information, and uncertainties about the factor have little influence on the timber supply projected in the base case, no discussion is included in this rationale. These factors are listed in Table 2.

*Table 1. List of accepted factors*

<b><i>Forest Act</i> section and description</b>	<b>Factors accepted as modelled</b>
8(8)(a)(i) Composition of the forest and its expected rate of growth	<ul style="list-style-type: none"> <li>• Non-forest land</li> <li>• Non-commercial cover</li> <li>• Environmentally sensitive areas</li> <li>• Unstable terrain</li> <li>• Low productivity sites</li> <li>• Forest inventory</li> <li>• Volume estimates for natural stands</li> <li>• Site productivity estimates</li> <li>• Genetic gains</li> <li>• Minimum harvest criteria</li> <li>• Operational adjustment factors</li> </ul>
8(8)(a)(ii) Expected time that it will take the forest to become re-established following denudation	<ul style="list-style-type: none"> <li>• Not satisfactorily restocked</li> </ul>
8(8)(a)(iii) Silvicultural treatments to be applied	<ul style="list-style-type: none"> <li>• Silvicultural systems</li> </ul>
8(8)(a)(iv) Standard of timber utilization and allowance for decay, waste, and breakage	<ul style="list-style-type: none"> <li>• Utilization standards</li> </ul>
8(8)(a)(v) Constraints on the amount of timber produced by use of the area for purposes other than timber production	<ul style="list-style-type: none"> <li>• Stand-level biodiversity</li> <li>• Scenic resources</li> <li>• Green-up and adjacency</li> <li>• Ungulate winter range</li> <li>• Wildlife habitat areas</li> <li>• Community and domestic watersheds</li> </ul>
8(8)(a)(vi) Any other information	<ul style="list-style-type: none"> <li>• AAC utilization</li> </ul>
8(8)(b) The short and long term implications to British Columbia of alternative rates of timber harvesting from the area	<ul style="list-style-type: none"> <li>• ---</li> </ul>

8(8)(d) Economic and social objectives of the government	<ul style="list-style-type: none"> <li>• Summary of public input</li> </ul>
8(8)(e) Abnormal infestations in and devastations of, and major salvage programs planned for, timber on the area	<ul style="list-style-type: none"> <li>• Other forest health issues</li> <li>• Unsalvaged losses</li> <li>• Disturbance outside the timber harvesting land base</li> </ul>

For other factors, where more uncertainty exists or where public or First Nations input indicates contention regarding the information used, modelling, or some other aspect under consideration, this rationale incorporates an explanation of how I considered the essential issues raised and the reasoning that led to my conclusions.

### Section 8 (8)

**In determining an allowable annual cut under this section the chief forester, despite anything to the contrary in an agreement listed in section 12, must consider**

- (a) **the rate of timber production that may be sustained on the area, taking into account**
- (i) **the composition of the forest and its expected rate of growth on the area**

### Land base contributing to timber harvesting

#### *- general comments*

The total area within the boundary of the Invermere TSA is 1 315 602 hectares. Excluding TFL 14, private land, areas not managed by the Crown for timber supply, non-productive land, and existing roads, the area of Crown forest management land base (CFMLB) is 577 095 hectares.

The timber harvesting land base (THLB) is a coarse estimate of the area currently available for timber production, after areas reserved from timber harvesting for economic, cultural, ecological or other factors have been excluded. The areas reserved may be determined based on legal requirements with defined boundaries or may be modelled surrogates for legal requirements or current practices. Because the THLB is an estimate derived for the purpose of timber supply modelling, the inclusion or exclusion of an area in the THLB does not necessarily correlate to how it will be managed and whether or not it will be harvested.

The THLB used in the base case is 195 616 hectares, which is about 16 percent smaller than the 233 873 hectares used in the previous timber supply review. This decrease is due to the establishment of new wildlife habitat areas in which logging is prohibited and changes in modelling assumptions. These changes include: accounting for landscape biodiversity requirements as an area reduction (i.e., old growth management areas) instead of a model constraint (i.e., old seral requirements); accounting for wildlife tree patches as an area reduction instead of a combination of area and volume reductions; and the exclusion of half of the area on slopes between 40 percent and 70 percent where previously no reduction was made.

#### *- land not administered by the Crown for TSA timber supply*

As part of the process used to define the THLB areas that are not administered by the Crown for TSA timber supply are excluded from the CFMLB. A review of the process used for this analysis found that a total of 4879 hectares, of which 3046 hectares contribute to the THLB, of private managed

forest land had been incorrectly included. A THLB overestimation of this magnitude represents a 1.6 percent overestimation of the timber supply projected in the base case. Having considered this information, I acknowledge this overestimation and I will account for it in my determination as discussed in **‘Reasons for Decision’**.

*- areas considered inoperable*

Those portions of the TSA that are neither physically operable nor economically feasible to harvest are categorized as inoperable, and are excluded from the THLB. For the Invermere TSA, operability mapping was originally completed in the early 1980’s and has been reviewed three times since then, most recently in 2003.

Based on a review of harvesting since 2003, district staff indicate that the 2003 operability mapping still provides a good estimate of the operable area in the TSA. Using this information, a net area of 162 705 hectares was considered inoperable and was excluded from the THLB.

Public input included a recommendation that there be a discussion to define a clear, mapped delineation of the line between the harvestable land base and inoperable high elevation areas. The comments noted that high elevation stands support many values that should be considered when defining the upper limit to harvesting.

With respect to this comment, I note that operability mapping only provides an estimate of the area in which harvesting may occur based on physical accessibility and economic factors. It does not dictate where, how or even if timber harvesting is going to occur. Furthermore, any future development of high elevation harvesting has to be consistent with the *Forest and Range Practices Act* and the land use decisions that have been made by government.

I accept that the best available information was used to identify and exclude inoperable areas from the THLB and make no adjustments to the base case on this account.

*- steep slopes*

District staff are concerned about harvest performance on steep slopes and have completed a review of the location of harvesting in the TSA over the last ten years for consideration in the timber supply analysis. The review included a spatial analysis of the approved cutting permits from 2003 to 2013 compared to terrain slope mapping. Based on this review all areas on slopes greater than 70 percent (class 3) and half of the areas on slopes between 40 percent and 70 percent (class 2) were excluded from the THLB. Application of these operability criteria resulted in the exclusion of a net area of 48 998 hectares from the THLB.

In addition to the spatial analysis, district staff reviewed information from the ministry’s Electronic Commerce Appraisal System (ECAS) to determine how much of the licensee reported volume between 2006 and 2015 qualified for the cable appraisal allowance. The results demonstrated that 46.3 percent of the volume harvested within class 2 slopes was cable based.

During the public review, I received comments from forest industry and the general public around the steep slope modelling assumptions.

BC Timber Sales (BCTS) acknowledged that poor markets and reduced cable-logging capacity have led to decreased harvesting on steeper slopes. However, BCTS recommended that the steep slope criteria should remain unchanged from the previous timber supply review when only class 3 areas were excluded from the THLB.

Canfor, who holds a replaceable forest licence in the TSA, noted that although the steep slope criteria reflect the last ten years of harvest performance it is working to build steep slope harvesting capacity. According to Canfor, its Radium Operations currently have the capacity to harvest 160 000 cubic metres per year from steep slopes and it expects to increase this to 240 000 cubic metres per year in two years. Canfor expects that it will be able to handle all steep slopes, including those greater than 70 percent. On the basis of this information, Canfor contends that steep slopes should not be removed from the THLB and, as a result, the base case underestimates timber supply.

Summit Valley Contracting Ltd., a forestry consulting company based in Invermere, recommended including all of class 2 areas and the institution of a partition of the AAC for the volume from steep slopes. This approach would provide greater opportunity to support the local sawmill.

Wildsight, a non-government conservation organization, noted that harvesting has, until recently, been concentrated on pine stands in low- to mid-elevation areas. The steep slope criteria used were considered to be overly optimistic and not consistent with Wildsight's observations.

In sensitivity analysis, inclusion of all class 2 slope area in the THLB resulted in a harvest level 17 percent above the base case level. Conversely, excluding all class 2 slope area from the THLB resulted in a harvest level 17 percent below the base case level.

I have considered the input received regarding this factor and I note that the steep slope criteria used in the analysis were validated by staff using a spatial analysis of harvested cut blocks. I conclude that the steep slope criteria reasonably reflect demonstrated performance and I will make no adjustments to the base case on this account in my decision.

I commend the harvest performance demonstrated by the licensees in effectively targeting MPB killed stands over the past ten years. I also recognize that this harvest strategy has restricted harvest to certain stand types and portions of the TSA. This has resulted in a disproportionate accumulation of harvest on flatter terrain areas where the MPB infested stand types generally occur. However, the sensitivity analyses presented to me clearly show that the base case harvest level can only be achieved if future harvesting resumes a distribution that matches the terrain profile of the THLB.

I appreciate the commitment made by Canfor to work to build steep slope harvesting capacity and I recognize that the need for other harvest priorities such as ecological restoration, fire and forest health management that will require continued harvest in flatter terrain areas. However, considering the degree to which the sustainability of my AAC decision is reliant on future harvesting resuming on steep slopes, I have requested under '**Implementation**' that district staff monitor steep slope harvest performance and report this information to me annually. Further, if district staff express concern that harvest performance does not reflect the levels assumed in the base case, I am prepared to revisit this determination earlier than required in legislation.

*- non-merchantable forest types*

In the base case, a total of 4642 hectares were excluded from the THLB to account for non-merchantable forest types. The exclusions included all deciduous and whitebark pine stands, which are considered uneconomic to harvest; and western redcedar, western hemlock and subalpine fir stands older than 200 years, which are rarely merchantable. District staff concur that these exclusions reflect current management but note that some whitebark pine is being harvested as a minor species in other stand types.

I am aware that approximately 4000 hectares of balsam "intermediate utilisation" (IU) stands were included in the THLB. Balsam IU stands are the legacy of harvesting that occurred in the 1950's, 1960's and 1970's in which only the high value mature spruce component of the stands was removed



making the residual stands marginally economic to harvest. Although the yield forecasts account for lower crown closure, the volume of these stands may be overestimated because the trees are growing in uneven-aged stand conditions, and past logging may have included higher than normal trail densities and left damaged residual stems.

Comments received from Wildsight suggested that the exclusion criteria for redcedar and hemlock stands should be reduced to 80 years from 200 years. The group also expressed concern over the observed harvest of whitebark pine given that it is an endangered species under the federal *Species at Risk Act*.

The Southern Guide and Outfitters expressed concern regarding the small proportion of deciduous leading stands in the Invermere TSA. They conveyed that deciduous trees are extremely important for wildlife and the loss of aspen and grassland habitat types is a major concern to the guide and outfitter industry. District staff inform me that aspen was historically removed as a non-crop tree in the TSA but it is now retained where feasible in wildlife tree retention areas.

I am reassured to learn that the habitat values provided by mature aspen are being promoted through the placement of wildlife tree retention areas. However, I am concerned regarding the incidental harvest of whitebark pine even if it is a minor component of the stand. As indicated under **'Implementation'**, I expect licensees to remain vigilant in identifying stands where this species grows and make every effort to minimize the incidental harvest of this species.

I accept that the criteria used to identify these non-merchantable forest types reasonably reflects current practice and is appropriately modelled in the base case. I note that the proportion of the area excluded composed of redcedar and hemlock leading stands is so small that changing the age criteria from 200 years to 80 years would have an insignificant effect on the base case.

Further, I accept the inclusion of the balsam IU stands in the THLB given that these stands occupy less than one percent of the THLB and given the low modelled yields, contributed insignificantly to the base case. Nevertheless, to clarify this issue, I have included a request under **'Implementation'** that improved information for these stands is collected for use in the next timber supply review.

*- problem forest types*

Problem forest types are stands that occupy sites that have the potential to produce merchantable timber but are currently not utilised. These stands are typically repressed with small average piece size and fewer sawlogs.

In the Invermere TSA, problem forest types are typically moderately dense lodgepole-pine leading stands in which stand density has caused suppressed tree growth. In the base case: 80 percent of lodgepole pine-leading stands older than 40 years with heights less than 10.5 metres (class 1); 35 percent of lodgepole pine-leading stands 41 to 60 years with heights of 16 metres (class 2); 18 percent of lodgepole pine leading stands 61 to 80 years with heights of 16 metres (class 3); and 29 percent of lodgepole pine leading stands older than 80 years with heights of 1 metre (class 4) were considered to be problem forests and were excluded from the THLB.

Ten percent of class 2, 24 percent of class 3 and 57 percent of class 4 stands were included in the THLB but were modelled with extended harvest rotations to account for their slower rate of growth.

District staff indicate that there has been no significant harvest of the problem forest types described above in the Invermere TSA over the last fifteen years and consequently these stand types should have been fully excluded from the THLB. District staff note that problem forest types tend to occur in pockets that are often incorporated into wildlife tree retention areas or other long-term reserves during forest operations.

Wildsight also commented that there has been little to no harvest performance in the problem forest types to date and suggested that these stands should have been excluded from the THLB.

In a sensitivity analysis, fully excluding the class 1 to 4 problem forest types resulted in a harvest level 4.8 percent lower than in the base case.

I have considered the information and input received on problem forest types and agree that in the absence of demonstrated harvest performance, all stands within class 1-4 should have been excluded from the THLB. On this basis, I conclude that the base case has been overestimated by 4.8 percent and I will account for this in my determination as discussed in '**Reasons for Decision**'.

*- roads, trails and landings*

Separate estimates were made to reflect the loss in productive forest land due to existing roads, trails and landings (RTL) and those that will be constructed in the future. Existing RTL estimates were applied only to the area with a history of harvesting and therefore established road access. This was approximated by applying reductions to the THLB area with stands less than 70 years old. Future RTL reductions were applied after stands were harvested for the first time in the timber supply model.

In the base case, 10 059 hectares and 3629 hectares, were excluded from the THLB to account for existing and future roads, respectively.

In 2008, Timberline Natural Resource Group produced the report, *Roads, Trails and Landings Inventory Project within the Invermere Timber Supply Area* which provided the reduction values applied in the analysis. After the timber supply analysis was completed analysis staff noted that the reduction factors for the Cranbrook TSA had been erroneously applied in the base case for the Invermere TSA. However, based on their review of the information they concluded that given the magnitude of the errors there was little, if any, net effect on the area excluded from the THLB to account for RTLs in the base case.

During the public review, the Backcountry Hunters and Anglers commented that over the last decade the East Kootenays have experienced a rapid growth of resource roads that have adversely affected wildlife. The group recommended: completion of a road and linear disturbance inventory; adoption of a no net increase in road density policy; the establishment road density guidelines; limits for maximum allowable road density; and modification of the appraisal system such that companies would not be reimbursed road construction costs if the maximum allowable road density has been exceeded and would be required to pay for the deconstruction and reclamation of roads (in excess of the maximum). In order to reduce access to high elevation grasslands and alpine habitat the group also recommended that all new roads within 500 metres of such areas be deconstructed and reclaimed.

Similar comments were received from the Southern Guides and Outfitters who recommended that a higher percentage of roads be reclaimed.

District staff inform me that the 2008 report is the best available information for use in the base case. Although the reduction values were erroneously applied in the analysis, based on my discussions with analysis staff, I am satisfied that the net effect on the base case is negligible and I will consider this no further in my determination.

Regional staff also expressed concern regarding the increased development of both forestry and non-forestry roads and indicate that efforts are currently underway in the Kootenay Boundary Region to strategically reduce road densities in areas of greatest benefit to wildlife habitats. While I appreciate the recommendations provided by the Backcountry Hunters and Anglers and Southern Guides and Outfitters, the specific requests for policy direction and legislative changes to address road density are not within the legislated mandate of the chief forester. In this respect, I encourage these groups to

work with both FLNRO and forest licensees to address wildlife habitats impacted by road densities. As described under ‘**Implementation**’, it is my expectation that improved road inventory data be collected for use in the next timber supply analysis. This information can also support regional efforts to manage road density.

### Existing forest inventory

#### *- volume estimates for managed stands*

In the base case, all stands harvested from 1982 onward are considered to be managed stands and were modelled with yield projections that reflect the benefits of regeneration silviculture practices. Site productivity estimates used in the yield projections were based on Site Index Estimates by BEC Site Series (SIBEC). These SIBEC estimates were first utilized in the analysis supporting the previous timber supply review. At that time, the large increases in expected yields resulting from this improved site index information caused district staff concern. Staff noted that forest health issues and animal damage can affect regenerating stand density in the TSA and potentially prevents stands from reaching the expected managed stand yields. In the previous rationale, the chief forester requested that licensees continue to monitor growth and yield from their second growth stands to track against the expected productivity as predicted from SIBEC. District staff inform me that limited work has been completed following that instruction. The concern over managed stand density falling short of the expected full potential still exists. Comments received from Wildsight expressed the same concern citing results from Stand Development Monitoring (SDM) carried out under the Forest and Range Evaluation Program (FREP) in other parts of the province. District staff inform me that local SDM data will soon be available for the Invermere TSA. I am also aware of the Young Stand Monitoring (YSM) program being implemented by inventory staff to investigate this issue throughout the province.

The managed stand yield projections were reviewed by district staff and were approved for use in the base case by analysis staff with growth and yield expertise. At this time there is little quantitative data to support the observation of density short-falls. Therefore, I conclude that the best available information was used in the base case and no accounting is required in respect to this factor. As indicated under ‘**Implementation**’, I expect district staff to work with FAIB and Resource Practices Branch staff to implement a monitoring program that includes YSM and SDM.

#### *- log grade changes*

In April 2006, new log grades were implemented for the BC Interior. Previously, a log was assessed according to whether the tree it came from was alive or dead at the time of harvest. Prior to April 2006, Grade 3 endemic (the ‘normal’ mortality observed in a mature stand) and Grade 5 (dead tree with less than 50 percent firmwood and/or less than 50 percent of lumber produced is merchantable) were not charged to the AAC if harvested. Under the new system, grades are based on log size and quality at the time the log is scaled, not simply whether it was alive or dead at harvest. To better account for all harvested volume in the AAC cut control, logs that were previously considered Grade 3 endemic or Grade 5 are now charged to the AAC. Therefore, this volume now needs to be taken into account in the AAC determination.

For the Invermere TSA, the best currently available estimates of dead potential volume can be obtained from FLNRO’s Harvest Billing System (HBS). For the period 1995 to 2004, when dead potential volumes were not charged against the AAC, the HBS showed that grade 3 endemic and grade 5 log volumes totalled about 5.8 percent of the cut-accountable volume in the Invermere TSA.

Since the stand yield information used in the base case did not account for the contribution of dead potential volume that is now charged to cut control, I conclude that the base case short- and mid-term harvest levels are underestimated by about 5.8 percent. I will account for this in my determination as discussed in ‘**Reasons for Decision**’.

**Section 8 (8) (a) (ii) the expected time that it will take the forest to become re-established on the area following denudation:**

Expected time to re-establish the forest following denudation

*- regeneration delay*

Regeneration delay is the period between harvesting and the time at which an area becomes occupied by a specified minimum number of acceptable, well-spaced seedlings. The data required to generate managed stand yield projections were summarized from free-growing survey data collected from 8000 hectares of regenerated stands within the TSA recorded in RESULTS since 1993. Regeneration delay was calculated as the difference between the harvest completion year and the year of planting. The regeneration delay factored in the assumption that the planting stock would already be one year old. For all stand types the delay was modelled as two years except for poor pine sites which used a delay of three years.

After the timber supply analysis was completed, district staff expressed concern that the RESULT data would not accurately reflect the regeneration difficulties experienced in some parts of the managed forest, in particular the Fire Maintained Ecosystem Restoration (FMER) areas. Frequent regeneration failures have been observed on some ecosystem types due to a combination of drought, cattle or ungulate damage, and disease. In these areas, given the high risk of western gall rust for pine and the poor performance of planted Douglas-fir, plans often specify natural regeneration of Douglas-fir, and thus a long regeneration delay.

Wildsight also noted that FMER areas are commonly left unplanted and suggested that a longer regeneration delay should be considered.

A sensitivity analysis was presented in the Public Discussion Paper that applied a 15-year regeneration delay to the entire FMER area. District staff inform me that these difficult regeneration areas only constitute approximately 37 percent of the FMER area. In a revised sensitivity analysis presented at the determination meeting, the 15-year regeneration delay was applied only to the difficult regeneration areas in the FMER area; this resulted in a harvest level 1.4 percent below the base case level across the entire planning horizon.

District staff are satisfied with the regeneration delays modelled in the base case except for those used for areas in FMER. I conclude that the base case has been overestimated by 1.4 percent and I will account for this in my determination as discussed in ‘**Reasons for Decision**’.

**Section 8 (8) (a) (iii) silvicultural treatments to be applied to the area:**

No factors considered under this section require additional comment.

**Section 8 (8) (a) (iv) the standard of timber utilization and the allowance for decay, waste and breakage expected to be applied with respect to timber harvesting on the area:**

Utilization

*- decay, waste and breakage*

The yield projections used in the base case include estimates of volume of wood lost to decay, waste and breakage. These estimates of losses have been developed for different areas of the province based on field samples. District staff have received comments from local foresters and the public regarding a trend of increased logging waste observed over the last ten years. The trend has become more apparent in the last five years as harvest operations have transitioned to cut-to-length systems that optimize log size in the field prior to transport to the mill.

I am aware that licensees are allowed to leave waste on logging sites up to a benchmark volume. When the benchmark has been exceeded, waste is billed through stumpage charges and the excess volume is accounted towards the licensee's apportioned volume of the AAC.

The Southern Guide and Outfitters expressed the opinion that the current level of waste or coarse woody debris left in many cut blocks is not acceptable. The group was largely concerned that the residual waste can act as an impediment to wildlife movement and can in some instances result in complete loss of habitat value.

The Ktunaxa Nation Council also expressed concern for the appropriate accounting of waste in the base case. District staff inform me that information on the process of waste reporting and auditing was provided in response. I encourage district staff to continue to work with the Ktunaxa Nation Council to address any further concerns that may remain.

District staff inform me that the majority of waste assessments submitted demonstrate that the level of avoidable waste is below benchmark thresholds set by the Province. The measurement and accounting of waste is reflected in the process of AAC cut control and does not affect the assumptions regarding decay, waste and breakage in the base case.

The concern regarding increasing waste levels is not specific to the Invermere TSA and is a growing concern throughout the province. Regional staff inform me that an initiative is under way to improve estimates of waste and I urge district staff to participate. I am concerned that any underestimation of waste will result in an understatement of the volume accounted for under AAC cut control. This would allow for the unintentional harvest of additional volume and could jeopardize the sustainability of the AAC that I determine.

Licensees should also be aware of this issue as it has the potential to diminish mid-term timber supply. I encourage licensees to fully utilize the volume harvested and consider ways in which potential waste could be used in fibre based products, as described under '**Implementation**'

District staff are satisfied with the decay, waste and breakage factors used in the base case. I will therefore make no further accounting in respect to this factor in my decision.

- *grade 4*

Section 17 (6) of the Cut Control Regulation allows licensees to apply to have grade 4 logs that are delivered to a non-lumber or veneer facility not count towards the AAC volume attributed to their licence (this is often referred to simply as “grade 4 credit”). As this grade 4 credit volume is not accounted against any licence, this may enable the total harvest in a TSA to exceed the Section 8 AAC. Grade 4 logs were expected to be mostly from dead pine stands but can also include other species and be either live or dead.

In the Invermere TSA, the grade 4 credit is intended to provide an incentive to licensees to utilise low quality logs. A review of cut control information since 2007 shows that an average of 13 025 cubic metres per year, about two percent of the AAC, was attributed as grade 4 credits. District staff are concerned that this practice results in harvest levels that are higher than the AAC and creates sustainability issues. I share their concern and agree that if the practice of grade 4 credits continues the sustainability of the AAC that I determine may be jeopardized.

In 2014, the *Forest Act* and the Cut Control Regulation were amended to allow the minister to set a maximum volume limit on grade 4 timber that may be credited in a TFL or TSA in situations where sustainability of the timber supply is a concern. No maximum has been set for the Invermere TSA. As discussed under ‘**Implementation**’, I expect district staff to continue to monitor the volumes attributed to grade 4 credit, and in the event that the volume of grade 4 credits could result in harvesting above the level of the AAC I determine, it is my expectation that staff will request that the Minister implement a maximum volume limit.

**Section 8 (8) (a) (v) the constraints on the amount of timber produced from the area that reasonably can be expected by use of the area for purposes other than timber production:**

Integrated resource management objectives

The Ministry of Forests, Lands and Natural Resource Operations is required under the *Ministry of Forests and Range Act* to manage, protect and conserve the forest and range resources of the Crown and to plan the use of these resources so that the production of timber and forage, the harvesting of timber, the grazing of livestock and the realization of fisheries, wildlife, water, outdoor recreation and other natural resource values are coordinated and integrated. Accordingly, the extent to which integrated resource management objectives for various forest resources and values affect timber supply must be considered in AAC determinations.

- *land use plan*

Forest management in the Invermere TSA is subject to the East Kootenay Land-Use Plan completed in 1995, which established commercial resource use areas, new protected areas and an economic strategy to mitigate the impacts resulting from plan implementation.

The Kootenay-Boundary Higher Level Plan Order (KBHLPO), which took effect on October 26, 2002, resulted in the legal establishment of 10 resource management objectives, including: biodiversity emphasis, old and mature forest, caribou, green-up requirements, grizzly bear habitat and connectivity corridors, consumptive use streams, enhanced resource development zones for timber, fire maintained ecosystems, visuals, and social and economic stability. In their FSPs, licensees must specify results and strategies to meet these objectives.

District staff have reviewed the base case and are satisfied that the assumptions used appropriately reflect the requirements of the KBHLPO.

*- landscape level biodiversity*

Old seral stage forest retention is an important aspect of landscape-level biodiversity. Landscape units with biodiversity emphasis options and requirements for old and mature forest retention have been legally established and are specified in the KBHLPO.

Old growth management areas (OGMA) have been spatially located and mapped in the TSA but not all of the OGMAs are legally established. The non-legal OGMAs were modelled as permanently reserved from harvest in the base case. It was assumed that, at the strategic level, the non-legal OGMAs appropriately represent the area required to be retained to achieve the legal old seral retention targets even if their shape and location may be modified in the future.

District staff inform me that the non-legal OGMAs are being maintained as current practice by licensees to meet the KBHLPO old seral targets. The areas required to meet the KBHLPO mature plus old seral targets have not been spatially located. Licensees ensure these targets are being met by monitoring the inventory of stands within each seral stage by landscape unit.

The KBHLPO allows for old seral targets to be reduced to one-third within low biodiversity emphasis option areas. The target for old seral was incrementally increased over the model forecast to achieve the full target by the end of the third rotation.

District staff have reviewed the information and assumptions used in the base case and are satisfied that they reasonably reflect current legal requirements and management practices.

The Southern Guide and Outfitters inquired about the participation of stakeholders when candidate OGMA areas are being selected and asked if evaluations are performed to ensure that they are actually benefiting wildlife. District staff responded that through FRPA the professional reliance model promotes direct discussions between licensees and stakeholders when specific OGMA location and benefits are evaluated.

The Ktunaxa Nation Council inquired if the mature and old seral targets are currently fully met. District staff responded that licensees have commitments made in their FSPs to follow KBHLPO and to track the current seral stage distribution of the land base and ensure that the seral stage thresholds are met.

District staff have noted that some non-legal OGMAs have been significantly impacted by wildfire in the last several years. The availability or identification of suitable replacement areas has not been investigated by district staff.

Based on the information provided to me and my discussions with staff I am satisfied that the base case appropriately accounts for landscape level biodiversity and OGMA requirements. Following this determination, it is my expectation that licensees will work in collaboration with the district to maintain and uphold OGMA designations within the Invermere TSA, as discussed in **'Implementation'**.

- *riparian areas*

Riparian areas bordering streams, lakes and wetlands provide key habitat for fish and wildlife and help conserve water quality and biodiversity. The *Forest Planning and Practices Regulation (FPPR)* specifies requirements for riparian reserve zones (RRZs) which exclude timber harvesting, and riparian management zones (RMZs) which place limits on timber harvesting in order to protect riparian habitats.

Stream, wetland and lakes classifications have been mapped for the TSA through several initiatives since 2000. Tree retention within the RMZ is guided by results and strategies within FSPs formulated by licensees. In the base case, an equivalent buffer was modelled for the RMZ and combined with the RRZ no harvest buffer; this produced an equivalent buffer area of 16 704 hectares that was excluded from harvesting in the base case. However, ministry staff noticed after the base case was completed that incorrect buffers were inadvertently applied for lakes over 100 hectares instead of lakes over 1000 hectares in size. This error resulted in a very small unquantified overestimation of the area excluded from harvest for riparian areas.

Canfor currently has a Forest Stewardship Council (FSC) certification regime in place that guides its management practices including riparian management. Through this certification, Canfor voluntarily commits to higher riparian management requirements than those required under FRPA.

To understand the extent of the enhanced riparian management requirements, district staff analysed data collected through the ministry's FREP monitoring program. Based on this review, staff concluded that if the FREP observations were inferred to represent current practice across the TSA, an additional 1600 hectares would be reserved from timber harvesting compared to the base case. However, due to the limited sample size and the difficulty in distinguishing between areas reserved from harvesting for riparian values and areas reserved for other values, such as wildlife tree areas and OGMAs, staff believe that the additional area retained could be significantly less than 1600 hectares. Further, district staff have also observed that actual riparian management practices do not always align with those recommended in the certification regime.

Comments received from Wildsight and the Ktunaxa Nation Council both expressed the opinion that the FSC certification regime should have been modelled as current practice in the base case.

Based on my consideration of the information regarding riparian management in the Invermere TSA and how it was modelled in the base, I accept that the area excluded from the THLB to account for riparian areas was overestimated by a small, unquantified amount and I will account for this in my determination as discussed under '**Reasons for Decision**'.

With respect to the enhanced riparian management requirements under FSC certification, I note that these represent voluntary commitments on the part of some of the licensees operating in the Invermere TSA for which no legal mechanisms exist to insure that the management practices are implemented and continued over time. Therefore, until such time as government recognizes the FSC riparian management requirements through amendments to FPPR or the establishment of new legal requirements, I will not consider them in my AAC determinations.



*- fire maintained ecosystem restoration*

Decades of wildfire suppression has led to overly dense stands on sites that once provided open forest and open range conditions in the Rocky Mountain Trench that are currently managed for ecosystem restoration. The fire maintained ecosystem restoration (FMER) area in the Rocky Mountain Natural Resource District is estimated to be 109 457 hectares, of which 62 050 hectares is open range and 47 406 hectares is open forest. These areas were established under the authority of the Kootenay-Boundary Higher Level Plan for grass-growing areas.

The KBLUP provides guidance for the restorations and maintenance of fire maintained ecosystems, and through treatments that contribute to the creation of a complex, ecologically appropriate mosaic of habitats over the long term. It specifies treatments in open range and open forest that will remove excessive immature and understory trees and emphasize the retention of the oldest and largest trees.

In the base case, open range areas were assumed to be available for harvest if they met the minimum harvestable criteria. After the initial harvest open range stands were removed from the THLB. Open forest areas were assumed to have an initial harvest entry that reduced stocking levels to historic low densities. These stands were then modelled with periodic low volume harvests in order to maintain the open forest attributes for range while providing timber volume.

Comments received from the Rocky Mountain Trench Society and Southern Guide Outfitters emphasized the importance of considering the restoration and maintenance of fire-maintained ecosystems when setting a new AAC. I note that the open forest areas were modelled with a yield projection and silviculture routine specific to the maintenance of the ecological and habitat values.

The Ktunaxa Nation Council also expressed concerns regarding the implementation of ecosystem restoration throughout their asserted traditional territory. I am aware that a best management practices document has recently been created to provide accepted guidance to planners and operators.

As I do not have the authority to direct specific harvest practices, I recommend that the Ktunaxa Nation Council work with licensees during the upcoming FSP renewal process to ensure the commitments, based on these best practices, address their concerns for management of fire-maintained ecosystems and the wildlife habitat values they provide, as discussed under '**Implementation**'.

The current AAC includes a 5000 cubic metre partition attributed to FMER areas to encourage initial restoration harvesting. District staff have observed that in the past five years harvest levels have increased in these stands, which is augmenting the total area of open range and open forest. This positive harvest performance indicates that a partition is no longer required. Harvest performance in FMER areas will be evaluated at the next timber supply review to ensure these ecosystems are appropriately managed over the long-term.

I accept that the approach used for modelling fire maintained ecosystems in the base case reasonably reflects current practices and legal requirements and will consider this factor no further in this determination.

*- identified wildlife*

Identified wildlife in the Invermere TSA have been protected through the establishment of wildlife habitat areas, ungulate winter range, and management practices specified in higher level plans.

An Ungulate Winter Range (UWR) has been established in the TSA for the protection of habitat for white-tailed deer, mule deer, moose, elk, bighorn sheep and mountain goat. The prescribed General Wildlife Measures (GWM) do not exclude timber harvesting in this UWR. Another UWR was

established for the protection of woodland caribou range in which harvesting is restricted. This UWR was excluded from harvest in the base case.

Sixteen wildlife habitat areas (WHA) have been established for the protection of identified wildlife. The associated GWMs established by ministerial order under the *Government Actions Regulation* (GAR) guide harvest practices in WHA. Operationally, the prescribed harvest practices vary by identified wildlife species from little operational impact to complete restriction of harvesting.

Analysis staff reviewed the area covered by WHAs and the associated harvest prescriptions in those areas that allowed for limited harvesting. The analyst concluded that attempting to model the operational level prescriptions on the very small area would not produce significant results in the strategic level timber supply model. All WHA with allowances for limited harvest, covering 132 hectares, were included in the THLB while the remaining 1062 hectares of WHA, where harvesting is completely restricted, were excluded from the THLB in the base case.

A letter from the Southern Guide and Outfitters requested a review of wildlife populations be completed for the TSA in order to ensure that the populations are sustainable. The group also inquired if evaluations are performed following establishment of WHAs to ensure the wildlife populations are benefitted. I am aware that some WHA effectiveness monitoring has been undertaken by FLNRO and the ministry is currently developing a Stand Level Wildlife Value monitoring protocol to be added to the district led FREP. FREP is also developing a WHA/UWR assessment monitoring procedure. District staff inform me that a recent WHA review by FLNRO biologists has resulted in the re-opening of best management practices to ensure specific habitat requirements are being maintained.

The Backcountry Hunters and Anglers Association submitted a request to establish and adopt a Wildlife Security Standard across the forest district that identifies all measurable components of secure habitat and cover. I note that the need for improved understanding of wildlife populations to support policy decisions led to the implementation of Habitat Supply Modelling for seven wildlife species of concern in the TSA. The habitat supply assessments completed attempt to provide the information required to evaluate the success of policy mechanisms such as WHAs and GWMs currently in place. I will consider the information collected so far and the implications to timber supply under the 'Cumulative Effects' section.

Comments received from The Ktunaxa Nation Council state that additional habitat area beyond the current WHAs must be protected in order to maintain wildlife populations. As discussed above, the effectiveness of the area reserved under current policy mechanisms will be discussed under the 'Cumulative Effects' section. The Ktunaxa Nation Council also recommended that all WHAs should have been modelled as fully excluded from harvest in the base case. District staff note that some WHAs overlap FMER areas where a limited amount of harvesting is required for ecosystem restoration. Identified wildlife species such as badger require ecosystem restoration to preserve and enhance habitat.

The Ktunaxa Nation Council inquired if the work completed by the Elk Valley Flathead Wildlife Enhancement Initiative (EFWEI) was considered in the analysis. District staff inform me that initiative is currently stalled. If the process resumes, any findings will be reviewed prior to the next timber supply review.

I am satisfied with the approach used to model WHA for identified wildlife in the base case. I will make no further accounting for this factor in my decision.

- *cultural heritage resources areas*

Information on cultural heritage and archaeological sites is provided by an Archaeology Overview Assessment (AOA) and band specific Traditional Use Studies (TUS) that have been completed within the Invermere TSA. Additional information is collected through consultation with First Nations regarding their aboriginal interests during the Forest Stewardship Plan application processes and through site-specific consultation that occurs during the cutting permit adjudication process. Most known cultural heritage and archaeological sites are small and many are found in areas with additional ecological or environmental protection requirements. These sensitive lands are typically reserved from harvest through the placement of riparian reserves or wildlife tree retention areas. Discussions with district staff indicate that minimal additional area to that already reserved would be required to protect cultural heritage and archaeological sites. Therefore, no land base reduction was applied for cultural heritage resource areas during the identification of the THLB used in the base case.

District staff are aware that certain areas of the TSA hold significant value to First Nations and will likely result in a higher level of information provided by First Nations during consultation. The additional area may reveal more extensive cultural heritage and archaeological sites that would require the establishment of additional reserve area beyond those modelled in the base case.

The accounting for cultural heritage resource areas in the base case is consistent with the previous TSR and current practice has not demonstrated any exceptions. However, district staff and comments received from the public have expressed concern that licensees are deferring harvest in areas that hold significant value to First Nations. The potential for additional reserves to accommodate more extensive cultural heritage and archaeological sites, and their effect on timber supply, will be unknown until harvest planning begins in these areas. I am also aware that Canfor's forest certification regime has established 'Cultural Conservation Value Forests' which have potential operational limitations.

In the comments received from First Nations, a request was made for a sensitivity analysis to investigate the effect on timber supply of restricting harvest in the areas classified by Canfor as 'Cultural Conservation Value Forests'. District staff noted that a sensitivity analysis could not be completed as Canfor has not made the certification regime data publicly available.

I have considered the information regarding cultural heritage and archaeological sites provided to me by district staff and the comments received from the public and First Nations. I recognize that areas that require additional harvest planning operations in cooperation with First Nations may be deferred due to the extra time required and expense. I support the work completed to date between Canfor and Ktunaxa Nation Council in identifying the 'Cultural Conservation Value Forests' and developing management practices for these areas. However, until these areas are legally reserved, I am unable to make adjustments to my decision on this account. District staff inform me that a cultural heritage resources monitoring initiative is currently planned and any information collected can be accounted for in subsequent AAC determinations.

**Section 8 (8) (a) (vi) any other information that, in the chief forester's opinion, relates to the capability of the area to produce timber:**

Other Information

*- harvest performance*

The cut control records show that there was no overharvest within the most recent cut control periods for each of the licenses within the TSA. The replaceable forest license holders and the non-replaceable license holders have worked together to achieve a total harvest close to the entire AAC. Currently there is a slight under harvest of the AAC.

The near full harvest of the AAC is encouraging on its own but causes me concern when considered in relation to the poor harvest performance on steep slopes discussed earlier. Analysis staff inform me that, if the current harvest was distributed proportionally to the terrain area profile of the TSA, only 43.2 percent of the cut that should have located on potential steep slope land base has been harvested. This indicates that the remaining 56.8 percent of the steep slope harvest allocation has been shifted to low slope land base. If this pattern continues, there is a potential sustainability issue for mid-term timber supply as harvesting will be limited to predominately steep slope areas.

I expect licensees to ensure that future harvesting better represents the terrain profile of the timber harvesting land base. As discussed under '**Implementation**', I request that licensees work with district and FAIB to come up with measures that will ensure that progress is made towards achieving this goal and report on progress annually so that I may monitor sustainability in the TSA. If harvest performance on steep slopes does not increase to the level assumed in the base case on which my AAC decision is predicated, I will consider institution of a partition in the AAC attributable to steep slopes, or re-determine the AAC earlier than the ten-year period specified in Section 8 of the *Forest Act*.

*- forest stewardship council certification*

Canfor obtained FSC Certification in 2005 and has been operating under a Sustainable Forest Management Plan (SFMP) which details the strategies followed to ensure conformance with FSC principles. District staff are not directly involved in the FSC Certification process and Canfor's current FSP does not include the FSC commitments in the results and strategies.

One of the principles of the SFMP is to maintain High Conservation Value Forest (HCVF) areas which have been mapped as part of the FSC certification process. These areas are intended to protect forests with significant biodiversity values, endangered ecosystems and to maintain basic services of nature. Forest areas fundamental to meeting the basic needs of local communities and support traditional cultural identity are also mapped as Cultural Conservation Value Forests (CCVF).

The HCVF and CCVF areas designated as excluded from harvest within the SFMP were not modelled as excluded in the base case unless there was overlap with a legal objective or commitment in the FSPs to exclude harvest. Canfor does not make the mapping of HCVF and CCVF areas available to the public but was able to provide a summary of the overlap between these areas and the THLB. The area designated as excluded from harvest within the SFMP that was not excluded from the THLB through other legal objectives was approximately 1.7% of the THLB.

District staff are concerned that the HCVF areas in mature older stands are being deferred from harvest and would prefer to see these stands harvested in proportion to the TSA stand profile. It would be difficult to support harvest exclusively from these stands if they can no longer be deferred at a point in the mid-term when timber supply becomes constrained.

Comments from the public and First Nations suggested that the HCVF and CCVF areas designated as no harvest should have been excluded from contributing to timber supply in the base case. The management practices specified for these areas within the SFMP are not enforced through any legal mechanism and, without that certainty; I am not able to account for them as current practice in my decision.

As indicated in my Guiding Principles, I will not speculate on land use decisions that have yet to be made by government. Therefore, while I recognize that Canfor is operating in accordance with the practices it negotiated with FSC, I will not account for these practices in this determination. In the event that government establishes legal requirements for HCVF and CCVF following this determination, they can be considered in subsequent AAC decisions. On this basis, I accept that the HCVF and CCVF were modelled appropriately and make no further accounting in respect to this factor in my decision.

*- First Nations consultation*

There are two First Nation Councils whose traditional territories are located within the Invermere TSA — the Ktunaxa Nation Council (KNC) and Shuswap Nation Tribal Council (SNTC). There are no Okanagan Nation Alliance member band communities within the TSA but the Okanagan Indian Band's traditional territory has a very slight overlap with the north-western portion of the TSA.

The KNC community ?Akisq'nuk First Nation (Columbia Lake Indian Band) is located within the TSA at Windermere. The ?Akisq'nuk First Nation has expressed interest in title over the Madias Tatley area adjacent to their reserve area. In the interim they are seeking a partnership with the province to participate in stewardship of the area.

The KNC has signed a Strategic Engagement Agreement (SEA), covering the period from 2013 to 2016, which is presently being renegotiated. A Forest Tenure Opportunity Agreement between the KNC and FLNRO provides licences to harvest to Ktunaxa communities. The KNC has also signed an Economic and Community Development Agreement for revenue sharing with forestry and mining operations within the TSA.

The Ktunaxa Kinbasket Treaty Council (KKTC) represents the KNC in treaty negotiations that have been ongoing since 1993. The negotiations are nearing completion of Stage 4 producing an Agreement-in-Principle that is currently under review by Ktunaxa Communities and Ktunaxa Government Sectors. A decision to proceed to Final Agreement negotiations is pending.

Three SNTC member bands have traditional territories which overlap the northern half of the Invermere TSA, namely the Adams Lake Indian Band, Neskonlith Indian Band and Shuswap Indian Band. One SNTC community, the Shuswap Indian Band, is located within the TSA at Invermere.

Shuswap Nation Tribal Council (SNTC) member bands are not involved in a treaty process but are engaged with the Province in New Relationship and other discussions associated with land and resource use within asserted traditional territories. A Forest Tenure Opportunity Agreement between the SNTC and FLNRO provides Shuswap communities with licences to harvest within the TSA.

First Nations consultation was undertaken as per the Haida consultation spectrum and consistent with the consultation requirements specified in Forest Consultation and Revenue Sharing Agreements, SEAs, and 2010 Updated Consultation Procedures.

In April 2014, an initial letter was sent by the Regional First Nations Relations (RFNR) team out to all First Nations with territory overlapping the TSA advising them that a new TSR was going to be initiated and that this process would culminate with the chief forester determining a new AAC for the Invermere TSA. The KNC response letter stated their interest in being involved in a meaningful way

in the TSR process. There was no response from the Adams Lake Indian Band, Neskonlith Indian band, Shuswap Indian Band or Okanagan Indian Band.

Following this letter, on October 26, 2015, the Invermere Data Package was sent for review by the same First Nations recipients. No response was received from the Adams Lake Indian Band, Neskonlith Indian band, Shuswap Indian Band or Okanagan Indian Band. A presentation to facilitate the understanding of the Data Package content was made by district staff to the KNC, Ktunaxa members and various representatives on December 16, 2015; January 11, 2016 and January 20th, 2016. A letter providing comments was received from the KNC on January 30, 2016. District staff provided a reply to these comments in a letter sent on March 1, 2016.

On September 9, 2016, the Invermere Public Discussion Paper was sent to the recipient First Nations for review. There was no response from the Adams Lake Indian Band, Neskonlith Indian band, Shuswap Indian Band or Okanagan Indian Band. A meeting was held on October 31, 2016 between the KNC, district staff and RFNR staff to discuss the Public Discussion Paper and the comments received from the KNC along with any other general concerns.

I had the opportunity to hear the concerns and recommendations provided by the KNC in person at a meeting on November 22, 2016. In making this AAC determination, I have considered both this direct communication, as well as the written submissions provided by the KNC.

I was pleased with the willingness of the KNC to engage with FLNRO and the very comprehensive information that was provided. I am very appreciative of the time it takes to assemble considering the limited staffing resources and the number of TSAs that fall within the KNC territory. The relationship between First Nations and government is evolving very quickly and the KNC have expressed an interest in moving towards a relationship of shared decision making. The KNC expressed to me the desire to be involved at the right level of planning to provide meaningful input and ensure that decisions are made with consideration of the issues they see as most important.

I agree that First Nations have much to contribute and there is a lot that we can learn from each other. I encourage First Nations to be engaged as early as possible in the TSR process in order to participate in the collection of information and build comfort with the assumptions used. Participation in early stages also offers more opportunity for FLNRO staff to learn how to more effectively work with First Nations in a collaborative way and enable relationship building in the processes of timber supply reviews.

I have considered the information received from First Nations and, where appropriate, I have addressed these concerns in my decision. I note that there were concerns identified which are not within my authority under Section 8 of the *Forest Act*, and other concerns identified that are being or can be addressed operationally. I am unable to speculate on decisions not yet made by other decision makers, such as land-use decisions. I have, however, wherever possible, worked to bring concerns to the attention of other government authorities so that progress can be made to resolve issues that may be impacting operations and relationships in the Invermere TSA.

I have reviewed the information regarding the consultation undertaken with First Nations and discussed it in detail with district, regional and branch staff. I am satisfied that the consultation was conducted appropriately and that reasonable efforts were made by district staff to engage and inform First Nations in the timber supply review process, collect information regarding their interests and understand how these may be affected by the AAC determination.

If new information regarding First Nations' aboriginal interests becomes available that significantly varies from the information that was available for this determination, I am prepared to revisit this determination sooner than the 10 years required by legislation.

- *climate change*

Climate change is predicted to impact forest ecosystems in a number of ways, including general increases in temperature, changes in precipitation patterns and increased frequency and severity of disturbances.

The report, *Adapting Forest Management to Climate Change in the Kootenay Boundary Region* (Pacific Climate Impact Consortium 2016) shows projected changes based on a standard set of Global Climate Models to the 2080's in average temperature, precipitation and derived climate variables. The report notes that climate change modelling suggests a potential decline in timber supply over the long term due to increased natural disturbance and lower precipitation in the growing season.

There is uncertainty about both the impact of climate change on timber supply and the appropriate response in timber supply decisions at this time. FAIB staff are planning to undertake analysis of the potential impacts of climate change on timber supply, and of the implications of different responses. This analysis will support discussions needed to determine the appropriate balance of general approaches in different areas of the province.

The effects of climate change on timber supply were a large concern among the comments received from the public and First Nations. The comments expressed the expectation that climate shifts will have a disproportionate impact in the TSA compared to other parts of the province. The comments also requested that the effects of climate change be incorporated into the timber supply analysis.

I have considered the work done to predict changes in climate across the TSA. Projected climate changes are likely to affect forest productivity, growth, natural disturbances, forest pests and hydrological balances; however, the magnitude and extent of the impacts are not yet certain. I am aware that to the extent some of these impacts are already observed, such as through recent disturbances from wildfires or increased damage from pests, they are reflected in timber supply analysis. I request that FLNRO staff continue to monitor changes and where possible, collect information to inform decisions. Any additional information and corresponding analysis that helps us to better understand how forest management decisions can be adapted to mitigate impacts can be incorporated into future timber supply reviews.

I have provided a more detailed description of how I account for climate change in AAC decisions under the '**Guiding Principles**' section of this rationale.

- *cumulative effects*

In its 2007 decision on *William*, the BC Supreme Court ruled that decision makers should consider credible information on wildlife values associated with First Nations rights and needs (e.g., hunting, trapping, fishing and trading), and the potential implications of the decision on wildlife and First Nations' needs. The Government of BC has supported implementation of the Cumulative Effects Framework (CEF) that aims to provide relevant information and supporting policy for decision making needs. The TSR process leveraged the CEF wildlife value assessments to support this requirement.

Habitat Supply Modelling (HSM) was completed for seven species in the Arrow, Kootenay Lake, Cranbrook and Invermere TSAs in relation to the base cases established through recent TSRs. The species selected were determined through consultations with the Ktunaxa Nation Council and included Flammulated Owl, Northern Goshawk, Williamson's Sapsucker, Rocky Mountain elk, mule deer, grizzly bear and American marten. At this time, the modelling results for a sub-set of three species were completed for my consideration in my AAC decision. These species were selected because forestry activity may have a particularly strong negative effect on their habitat. Specifically,

northern goshawk and American marten depend on old forest and are therefore sensitive to conversion of old to early seral forest. Grizzly bear are negatively impacted by human use of roads and trails and are therefore sensitive to forestry road development.

The current condition, trend from 2003, and potential future effects on Northern Goshawk, American marten, and grizzly bear habitat were assessed. The reference points for interpreting value conditions were based on government expectations found in guidance, best management practices or policy. Information presented included both direct (e.g., amount of timber harvest) and indirect (e.g., spatial pattern of harvest) effects that may result from harvesting at the base case level, recognising that the model spatialization is only an interpretation of what the actual harvest patterns might look like.

The most significant factor threatening northern goshawk populations in British Columbia is the loss of mature and old forests used by goshawks for breeding and foraging. Northern goshawks exhibit strong fidelity to established breeding areas and will occupy them for years if suitable conditions persist. Direct disturbance from industrial activities close to an active goshawk nest can cause breeding birds to abandon their nests during critical times.

The interior subspecies of the Northern Goshawk was removed from the Identified Wildlife list and does not have formal protection measures beyond best management practices that were established in 2012. The HSM revealed that current harvest practices, as represented in the base case, will reduce the future amount of productive breeding habitat by approximately 68 percent. The modelling results have a degree of uncertainty due to the limitations of the model which did not incorporate spatial habitat requirements. The summary presented to me demonstrates that the practices currently employed to meet the existing measures under FRPA may not provide enough productive breeding areas for Northern Goshawk in the TSA to maintain a viable population. The analysis summary concludes that sufficient measures must be taken to protect breeding areas in the near future, otherwise this species may become at risk.

Marten are highly selective of habitats that provide thermal and security cover and are associated with late seral-stage forests and with uneven-aged stands of conifers or mixed woodlands. Marten population sizes have been found to decline with removal of forested habitat, increased human access, and unrestricted trapping. Winter is considered to be the critical season for marten, because feeding opportunities are the most limited, mobility is restricted by deep snow, and energy demands for thermoregulation and travel are the highest.

The HSM revealed that current harvest practices, as represented in the base case, will reduce productive winter habitat for marten by approximately 84% percent. The modelling results also have a degree of uncertainty due to the model not incorporating spatial habitat requirements. The summary presented to me suggests that marten populations have declined in portions of the TSA due to loss of habitats, fragmentation and reduced connectivity. The analysis summary concludes that the amount of old and mature forests retained under FRPA may not be sufficient and measures should be taken to manage marten habitat in the near future, otherwise populations may continue to decline.

Two models were created to predict the impacts of forestry activity on grizzly bear. The first model was a habitat model that examined changes in habitat quality and quantity due to predicted forestry activity. The second model was a population model that expanded on the habitat model to include impacts of forestry road development and hunting pressure on grizzly bear population abundance, recruitment and mortality rates as well as grizzly bear habitat carrying capacity.

Given that foraging represents the most limiting aspect of grizzly bear life history, grizzly bear habitat value is determined by the ability of habitat to provide forage during each growing season. The results of the habitat model showed forestry activity had very little effect on grizzly bear habitat due to their reliance on other habitats such as avalanche paths, riparian areas and alpine.



It is widely accepted by the scientific community that impacts from access and human settlement are the largest factors affecting grizzly bear survival. The population model was first run with no projection of future harvesting. In this scenario, the model predicted that the current forestry-related impacts to grizzly bear habitat could cause a mid-term decline in habitat carrying capacity in combination with increasing mortality rates resulting from the accumulated road density. The second scenario modelled continued timber harvesting as projected in the base case. The population model predicted that continued forestry activity could potentially cause a decline in grizzly bear populations by 15 to 80 percent, which represents a wide range of uncertainty.

I have considered the information presented regarding the CEF assessment work completed in the Invermere TSA and discussed it with FLNRO staff. I commend the work undertaken to date to better understand the cumulative effects of all activities as well as natural events on the land base and support continued work at the regional level.

I note that there are very similar trends between the HSM results for northern goshawk and marten since both species are heavily dependent on old growth attributes. Regional staff inform me that new inventory data collected using LIDAR have the potential to better identify suitable breeding and home range habitats for the Northern Goshawk and will assist planning for long term protection. Similarly, the LIDAR inventory data have potential to refine marten habitat mapping, identify fragmentation and improve connectivity planning. I encourage the further investigation of this new data to refine and reduce the uncertainty in the HSM and recommend that new results be incorporated with the timber supply analysis for the next AAC determination.

Regional staff also recommend that the management of Northern Goshawk and marten habitat should both be incorporated into the Integrated Silviculture Strategy (ISS) project being initiated in the region. I agree that the vulnerability of these species, as demonstrated by the HSM, makes them an appropriate value to include in the forward-looking ISS analysis work.

Regional staff inform me that grizzly bear populations in southeast BC have the highest human caused mortality rates in the Province and there is a clear need to conduct and implement access management planning to mitigate these impacts. District staff note that removing roads once forestry activities are completed represents the most effective method of reducing access, compared to the installation of physical barriers that can be removed or circumvented or legislated road closures that require increased enforcement and public awareness. I request that licensees consider utilizing existing road systems as much as possible rather than adding to existing road densities and prioritize the planning of road deactivation. I expect district staff to work with region staff and licensees to initiate access management planning in the TSA in support of both operations, decrease of road density and grizzly bear requirements in the TSA.

I am aware that the resource values assessed are of particular importance to First Nations. As such, I have included a request under '**Implementation**' that FLNRO staff and licensees continue to work with First Nations on planned actions for wildlife habitat management and mitigate the effects of harvesting on habitat values.

**Section 8(8) (b) the short and long term implications to British Columbia of alternative rates of timber harvesting from the area,**

Alternative rates of harvesting

*- alternative harvest forecasts*

The base case projects a harvest level of 447 158 cubic metres per year that is sustained for the entire 250-year forecast. A range of alternative harvest forecasts were developed that varied the harvest rate over time with different initial harvest levels and correspondingly different mid-term levels.

The first alternative harvest flow set the initial harvest level at the current AAC, 598 570 cubic metres per year, for five years then decreased it to a mid-term harvest level of 436 022 cubic metres per year which is 2.5 percent lower than from the base case. By the year 2074, the harvest level was forecast to return to the base case level for the remainder of the long-term.

The second alternative harvest flow tested an initial harvest level of 522 864 cubic metres per year which is half way between the current AAC and the base case. The corresponding mid-term harvest level was 441 676 cubic metres per year which is a 1.2 percent decrease from the base case. As observed in the first alternative harvest flow, the long-term harvest level could resume the base case level by 2024.

Having reviewed the information regarding the assumptions around harvest sequencing and discussed this information with staff, I note that the timber supply in the Invermere TSA is robust enough to allow for a transitioned decrease with only small consequence to the mid-term timber supply. I will consider this further under ‘**Reasons for Decision**’.

**Section 8 (8) (c) the nature, production capabilities and timber requirements of established and proposed timber processing facilities:**

This section of the *Forest Act* has been repealed [2003-31-2 (B.C. Reg. 401/2003)]

**Section 8 (8) (d) the economic and social objectives of the government, as expressed by the minister, for the area, for the general region and for British Columbia:**

Economic and social objectives

*- Minister’s letters*

Government provided direction regarding the economic and social objectives of the Crown to the chief forester in two letters dated July 4, 2006 and October 27, 2010.

The first letter is dated July 4, 2006 (attached as Appendix 3). In this letter, the minister asked for consideration, during AAC determinations, of the importance of a stable timber supply in maintaining a competitive and sustainable forest industry while being mindful of other forest values. As well, the minister suggested that the chief forester should consider the local social and economic objectives expressed by the public and relevant information received from First Nations.

The Minister also emphasizes the mountain pine beetle outbreak in the interior of British Columbia. He indicates that of particular relevance to AAC determinations are the objectives of encouraging

long-term economic sustainability for communities affected by the epidemic; recovering the greatest value from dead timber before it burns or decays, while respecting other forest values; and conserving the long-term forest values identified in land-use plans. As well, the Minister requested that the chief forester consider the local social and economic objectives expressed by the public, and information received from First Nations.

The minister, in another letter dated October 27, 2010 provided the Crown's objectives with respect to mid-term timber supply in areas affected by the mountain pine beetle.

With respect to the 2006 letter, I note that in the base case as well as in the alternative harvest projections prepared for this determination that a primary objective has been to attain a stable, long-term harvest level where the growing stock is also stable. I am satisfied that the base case has incorporated the best available information regarding the impacts of the mountain pine beetle epidemic on stands in the Invermere TSA. As discussed elsewhere in this document, the mountain pine beetle epidemic has subsided, and much of the salvage of damaged pine stands has been completed.

During my consideration of the factors required under Section 8 of the *Forest Act*, I have been mindful of the local objectives as well as the interests and objectives of First Nations. I have also reviewed the public consultation process undertaken by the district and considered the input received in making my determination. On this basis, I am satisfied that this determination accords with the objectives of province as expressed by the minister.

*- local objectives*

The Minister's letter of July 4, 2006, suggests that the chief forester should consider important social and economic objectives expressed by the public during the timber supply review process, where these objectives are consistent with the government's broader objectives as well as any relevant information received from First Nations.

In the applicable sections of this document I have provided my consideration of input from the public as well as First Nations.

**Section 8 (8) (e)      abnormal infestations in and devastations of, and major salvage programs planned for, timber on the area:**

Abnormal infestations

*- Mountain pine beetle*

The MPB infestation peaked between 2006 and 2008 in the Invermere TSA and has been progressively subsiding since then. Over this time, local licensees actively managed the MPB infestations through aggressive salvage practices and by implementing other suppression activities mainly fall and burn. District staff note that the MPB infestation has basically run its course within the TSA. As such, no additional analysis of the MPB infestation was included in the base case and any remaining losses at the endemic level of infestation were accounted for in the natural stand yield projections.

District staff concur that no further consideration of the recent MPB infestation was required but note that future periodic losses should have been considered in the base case. Periodic losses due to other beetle species and natural disturbances that remain unsalvaged were accounted for in the base case through reductions to the growing stock each year of the forecast.

The volume that will be periodically killed by MPB and never salvaged was estimated using information gathered from overview flight surveys completed by forest health professionals within the Resource Practices Branch and historic information observed at the district level. The losses recorded over the last ten years averaged to be approximately 35 000 cubic metres annually.

I agree that not accounting for future outbreaks of MPB was an oversight. However, I believe the estimate of 35 000 cubic metres per year, approximately 7.8 percent of base case, to be too high. The data were collected during a catastrophic outbreak of MPB over the last ten years and represent an upper limit to potential losses. Outbreaks of this severity may occur again in the future but are highly unlikely in the near term as the age class structure left after the current outbreak is now dominated by younger stands that are not as susceptible to infestation. I am mindful that the estimated losses used in the analyses supporting the last two AAC determinations, prior to the peak of the MPB outbreak, were 12 112 cubic metres per year in 2001 and 15 673 cubic metres per year in 2005. Relative to the current base case these values would be approximately 2.7 percent and 3.5 percent, respectively. I believe an average of these values, approximately 3.0 percent, is a reasonable estimation of the future period losses due to MPB that will remain unsalvaged. I will consider this overestimation in my determination as discussed in ‘**Reasons for Decision**’.

## **Reasons for Decision**

In reaching my AAC determination for the Invermere TSA, I have considered all of the factors required under Section 8 of the *Forest Act* and I have reasoned as follows.

The base case suggests that a harvest level of 447 158 cubic metres per year could be sustained for the entire 250-year forecast. I am satisfied that the assumptions applied in the base case forecast for the majority of the factors applicable to the Invermere TSA were appropriate. However, I have identified a number of factors, which, considered separately, indicate that the timber supply may be either greater or less than that projected in the base case. Some of these factors can be readily quantified and their impact on the harvest level assessed with reliability. Others may influence timber supply by adding an element of risk or uncertainty to the decision, but cannot be reliably quantified at this time. Following is my consideration of those factors for which I consider it necessary to further account for their implications to the timber supply.

I have identified the following factors in my considerations as indicating that the timber supply projected in the base case may have been overestimated:

- *Land not administered by the Crown* – areas of private managed forest land were incorrectly included in the THLB resulting in about a 1.6 percent overestimation in the base case harvest level;
- *Problem Forest Types* – considering the absence of harvest performance, these stands should have been fully excluded from harvesting, resulting in about a 4.8 percent overestimation in the base case harvest level;
- *Regeneration Delay* – the regeneration difficulties experienced in portions of the fire maintained ecosystem restoration areas was not accounted for in the base case resulting in about a 1.4 percent overestimation in the harvest level;
- *Mountain Pine Beetle* – the unsalvaged losses due to mountain pine beetle were not accounted for in the base case resulting in about a 3.0 percent overestimation in the harvest level;

Factors identified as indicative of a potential underestimation in the timber supply to a degree that can be quantified with accuracy are as follows:

- *Log grade change* – the inventory information used does not record the dead volume that is now charged to cut control resulting in about a 5.8 percent underestimated in the base case harvest level.

In addition, I concluded that the following factors were indicative of a potential influence on timber supply to a degree that currently cannot be quantified with accuracy:

- *Riparian* – the area excluded from harvesting for riparian values was underestimated by a very small unquantified amount for which I will make no accounting in my decision.
- *Roads, Trails and Landings* – the productive forest lost due to existing and future roads was overestimated but I will not account for this factor in my decision as it only influences timber supply in the long term.

In addition to the adjustments to the base case listed above, and as discussed throughout this document, I have also considered the information and recommendations that I received from First Nations and the public through written submissions and meetings. Many of these considerations are described earlier in this document and have not been repeated in this section.

I have considered the ongoing identification of areas of cultural importance to First Nations and the timber supply risks associated with these areas in this decision. As more information about the location and extent of culturally sensitive sites is made known and government provides land use objectives for these areas, I will be able to account for these areas more explicitly in AAC determinations.

Although I commend the harvest performance demonstrated by the licensees in effectively targeting MPB killed stands over the past ten years, I also recognize that this harvest strategy has restricted harvest to certain stand types and portions of the TSA. This has resulted in a disproportionate accumulation of harvest on flatter terrain areas where the MPB infested stand types generally occur. The sensitivity analyses presented to me, as discussed under ‘**steep slopes**’, clearly show that the base case harvest level can only be achieved if future harvesting resumes a distribution that matches the terrain profile of the THLB.

The underestimation of short- and mid-term timber supply due to log grade adjustments, while significant when considered independently, is not a reason to contemplate an increase in harvest levels when considered in the context of an already accelerated harvest rate. While I will not be specifically increasing short-term harvest levels due to this factor, I would clarify that my determination has fully considered and accounted for the log grade change. In any event, any dead potential volume harvested in the short term in place of live timber that is currently accounted for in the inventory will provide for a more robust timber supply in future. I will not consider this factor further in this determination.

The base case identifies a sustainable harvest level that is 23 percent lower than the current AAC. In reviewing the implications for the timber supply resulting from the above factors taken in combination, I note that the timber supply is even lower than suggested in the base case. On balance, the under- and overestimations attributable to the factors indicate to me that the base case overestimates timber supply by about five percent.

However, the harvest sequencing sensitivity analyses demonstrated that timber supply in the Invermere TSA is robust enough to allow for a transitioned decrease with only small consequence to the mid-term timber supply.

Therefore, I am establishing a two-tiered AAC for the Invermere TSA by establishing a transitional step at the mid-point between the current AAC and the base case. To account for the overestimation identified by the factors, I have reduced both the transition step and base case harvest levels by about five percent.

## Determination

I have considered and reviewed all the factors as documented above, including the risks and uncertainties of the information provided. It is my determination that a timber harvest level that accommodates objectives for all forest resources and that reflects current management practices as well as the socio-economic objectives of the Crown, can be best achieved in the Invermere TSA by establishing an AAC of 496 720 cubic metres for the five-year period between June 29, 2017 and June 29, 2022. Effective June 30, 2022 the AAC will be 424 800 cubic metres. This AAC will remain effect until a new AAC is determined, which is required to take place within 10 years of this determination.

If additional significant new information is made available to me, or major changes occur in the management assumptions upon which I have predicated this decision, then I am prepared to revisit this determination sooner than the 10 years required by legislation.

## Implementation

In the period following this decision and leading to the subsequent determination, I encourage FLNRO staff, licensees and other major project proponents to undertake or support the tasks and studies noted below, the particular benefits of which are described in appropriate sections of this rationale document. I recognize that the ability of all parties to undertake or support these projects is dependent on provincial priorities and available resources, including funding. However, these projects are important to help reduce the risk and uncertainty associated with key factors that affect the timber supply in the Invermere TSA.

- **Non-merchantable forest types** – I request that improved inventory information be collected for balsam IU stands for use in the next timber supply analysis;
- **Non-merchantable forest types** – I expect licensees to remain vigilant in identifying stands where white bark pine grows and make every effort to minimize the incidental harvest of this species;
- **Roads, Trails and Landings** – I request that improved road inventory data be collected for use in the next timber supply analysis;
- **Volume estimates for managed stands** – I expect district staff to work with FAIB and Resource Practices Branch staff to implement a monitoring program that includes YSM and SDM;
- **Decay, waste and breakage** – I encourage licensees to fully utilize the volume harvested and consider ways in which potential waste could be used in fibre based products;
- **Grade 4** – I request that staff monitor the volumes attributed to the grade 4 cut control credit and if such volume becomes a sustainability concern for the timber supply, request a maximum volume limit be implemented by the Minister;

- **Steep slopes** – I request that licensee works with district and analysis staff to develop measures that will ensure that progress is made towards achieving a harvest distribution that better represents the terrain profile of the timber harvesting land base. It is my expectation that district staff will report harvest performance on steep slopes to me annually.
- **Landscape level biodiversity** – I encourage licensees to work in collaboration with the district to maintain and uphold the OGMA designations;
- **Fire maintained ecosystem restoration** – I recommend that the KNC work with licensees during the upcoming FSP renewal process to ensure the commitments, based on these best practices, address their concerns for management of fire-maintained ecosystems and the wildlife habitat values they provide;
- **Cumulative effects** – I encourage the further investigation of the use of LIDAR data to refine and reduce the uncertainty in the habitat supply modelling and recommend that new results be incorporated with the timber supply analysis for the next AAC determination.
- **Cumulative effects** – I request that licensees consider utilizing existing road systems as much as possible and prioritize the planning of road deactivation. I expect district staff to work with region staff and licensees to initiate access management planning in the TSA in support of both operations, decrease of road density and grizzly bear requirements in the TSA.
- **Cumulative effects** – I request that FLNRO staff and licensees continue to work with First Nations on planned actions for wildlife habitat management and mitigate the effects of harvesting on habitat values.



Diane Nicholls, RPF  
Chief Forester

June 29, 2017

## Appendix 1: Section 8 of the *Forest Act*

Section 8 of the *Forest Act*, Revised Statutes of British Columbia 1996, c. 157, reads as follows:

### Allowable annual cut

8 (1) The chief forester must determine an allowable annual cut at least once every 10 years after the date of the last determination, for

(a) the Crown land in each timber supply area, excluding the Crown land in the following areas:

- (i) tree farm licence areas;
- (ii) community forest agreement areas;
- (iii) first nations woodland licence areas;
- (iv) woodlot licence areas, and

(b) each tree farm licence area.

(2) If the minister

(a) makes an order under section 7 (b) respecting a timber supply area, or

(b) amends or enters into a tree farm licence to accomplish a result set out under section 39 (2) or (3),

the chief forester must make an allowable annual cut determination under subsection (1) for the timber supply area or tree farm licence area

(c) within 10 years after the order under paragraph (a) or the amendment or entering into under paragraph (b), and

(d) after the determination under paragraph (c), at least once every 10 years after the date of the last determination.

(3) If

(a) the allowable annual cut for the tree farm licence area is reduced under section 9 (3), and

(b) the chief forester subsequently determines, under subsection (1) of this section, the allowable annual cut for the tree farm licence area,

the chief forester must determine an allowable annual cut at least once every 10 years from the date the allowable annual cut under subsection (1) of this section is effective under section 9 (6).

(3.1) If, in respect of the allowable annual cut for a timber supply area or tree farm licence area, the chief forester considers that the allowable annual cut that was determined under



subsection (1) is not likely to be changed significantly with a new determination, then, despite subsections (1) to (3), the chief forester

(a) by written order may postpone the next determination under subsection (1) to a date that is up to 15 years after the date of the relevant last determination, and

(b) must give written reasons for the postponement.

(3.2) If the chief forester, having made an order under subsection (3.1), considers that because of changed circumstances the allowable annual cut that was determined under subsection (1) for a timber supply area or tree farm licence area is likely to be changed significantly with a new determination, he or she

(a) by written order may rescind the order made under subsection (3.1) and set an earlier date for the next determination under subsection (1), and

(b) must give written reasons for setting the earlier date.

(4) If the allowable annual cut for the tree farm licence area is reduced under section 9 (3), the chief forester is not required to make the determination under subsection (1) of this section at the times set out in subsection (1) or (2) (c) or (d), but must make that determination within one year after the chief forester determines that the holder is in compliance with section 9 (2).

(5) In determining an allowable annual cut under subsection (1) the chief forester may specify that portions of the allowable annual cut are attributable to one or more of the following:

(a) different types of timber or terrain in different parts of Crown land within a timber supply area or tree farm licence area;

(a.1) different areas of Crown land within a timber supply area or tree farm licence area;

(b) different types of timber or terrain in different parts of private land within a tree farm licence area.

(c) [Repealed 1999-10-1.]

(6) The minister must determine an allowable annual cut for each woodlot licence area, in accordance with the woodlot licence for that area.

(7) The minister must determine an allowable annual cut for

(a) each community forest agreement area in accordance with the community forest agreement for that area, and

(b) each first nations woodland licence area in accordance with the first nations woodland licence for that area.

(8) In determining an allowable annual cut under subsection (1) the chief forester, despite anything to the contrary in an agreement listed in section 12, must consider

(a) the rate of timber production that may be sustained on the area, taking into account

- (i) the composition of the forest and its expected rate of growth on the area,
- (ii) the expected time that it will take the forest to become re-established on the area following denudation,
- (iii) silviculture treatments to be applied to the area,
- (iv) the standard of timber utilization and the allowance for decay, waste and breakage expected to be applied with respect to timber harvesting on the area,
- (v) the constraints on the amount of timber produced from the area that reasonably can be expected by use of the area for purposes other than timber production, and
- (vi) any other information that, in the chief forester's opinion, relates to the capability of the area to produce timber,

(b) the short and long term implications to British Columbia of alternative rates of timber harvesting from the area,

(c) [Repealed 2003-31-2.]

(d) the economic and social objectives of the government, as expressed by the minister, for the area, for the general region and for British Columbia, and

(e) abnormal infestations in and devastations of, and major salvage programs planned for, timber on the area.

(9) Subsections (1) to (4) of this section do not apply in respect of the management area, as defined in section 1 (1) of the *Haida Gwaii Reconciliation Act*.

(10) Within one year after the chief forester receives notice under section 5 (4) (a) of the **Haida Gwaii Reconciliation Act**, the chief forester must determine, in accordance with this section, the allowable annual cut for

(a) the Crown land in each timber supply area, except the areas excluded under subsection (1) (a) of this section, and

(b) each tree farm licence area

in the management area, as defined in section 1 (1) of the *Haida Gwaii Reconciliation Act*.

(11) The aggregate of the allowable annual cuts determined under subsections (6), (7) and (10) that apply in the management area, as defined in section 1 (1) of the *Haida Gwaii Reconciliation Act*, must not exceed the amount set out in a notice to the chief forester under section 5 (4) (a) of that Act.

## **Appendix 2: Section 4 of the *Ministry of Forests and Range Act***

Section 4 of the *Ministry of Forests and Range Act* reads as follows:

### **Purposes and functions of ministry**

- 4 The purposes and functions of the ministry are, under the direction of the minister, to do the following:
- (a) encourage maximum productivity of the forest and range resources in British Columbia;
  - (b) manage, protect and conserve the forest and range resources of the government, having regard to the immediate and long term economic and social benefits they may confer on British Columbia;
  - (c) plan the use of the forest and range resources of the government, so that the production of timber and forage, the harvesting of timber, the grazing of livestock and the realization of fisheries, wildlife, water, outdoor recreation and other natural resource values are coordinated and integrated, in consultation and cooperation with other ministries and agencies of the government and with the private sector;
  - (d) encourage a vigorous, efficient and world competitive
    - (i) timber processing industry, and
    - (ii) ranching sectorin British Columbia;
  - (e) assert the financial interest of the government in its forest and range resources in a systematic and equitable manner.

Appendix 3: Minister's letter of July 4, 2006



JUL 04 2006

Jim Snetsinger  
Chief Forester  
Ministry of Forests and Range  
3<sup>rd</sup> Floor, 1520 Blanshard Street  
Victoria, British Columbia  
V8W 3C8

Dear Jim:

**Re: Economic and Social Objectives of the Crown**

The *Forest Act* gives you the responsibility for determining Allowable Annual Cuts—decisions with significant implications for the province's economy, communities and environment. This letter outlines the economic and social objectives of the Crown you should consider in determining Allowable Annual Cuts, as required by Section 8 of the *Forest Act*. This letter replaces the July 28, 1994 letter expressing the economic and social objectives of the Crown, and the February 26, 1996 letter expressing the Crown's economic and social objectives for visual resources. The government's objective for visual quality is now stated in the Forest Practices and Planning Regulation of the *Forest and Range Practices Act*.

Two of this government's goals are to create more jobs per capita than anywhere in Canada and to lead the world in sustainable environmental management. The Ministry of Forests and Range supports these objectives through its own goals of sustainable forest and range resources and benefits. In making Allowable Annual Cut determinations, I ask that you consider the importance of a stable timber supply in maintaining a competitive and sustainable forest industry, while being mindful of other forest values.

The interior of British Columbia is in the midst of an unprecedented mountain pine beetle outbreak. Government's objectives for management of the infestation are contained in British Columbia's Mountain Pine Beetle Action Plan. Of particular relevance to Allowable Annual Cut determinations are the objectives of encouraging long-term economic sustainability for communities affected by the epidemic; recovering the greatest value from dead timber before it burns or decays, while respecting other forest values; and conserving the long-term forest values identified in land use plans.

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Minister of  
Forests and Range  
and Minister Responsible  
for Housing

Office of the  
Minister

Mailing Address:  
PO Box 9049 Stn Prov Govt  
Victoria BC V8W 9E2  
Telephone: 250 387-6240  
Facsimile: 250 387-1040

Location:  
Parliament Buildings  
Victoria BC V8V 1X4  
e-mail: FOR.Minister@gov.bc.ca

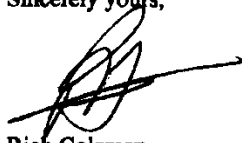
Jim Snetsinger

To assist the province and affected communities in planning their responses to the beetle infestation, it would be best to have realistic assessments of timber volumes that can be utilized economically. Therefore, in determining the best rate of harvest to capture the economic value from beetle-killed timber, I ask that you examine factors that affect the demand for such timber and products manufactured from it, the time period over which it can be utilized, and consider ways to maintain or enhance the mid-term timber supply.

The coast of British Columbia is experiencing a period of significant change and transition. In making Allowable Annual Cut determinations I urge you to consider the nature of timber supply that can contribute to a sustainable coast forest industry, while reflecting decisions made in land and resource management plans.

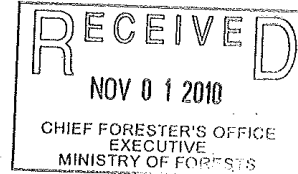
You should also consider important local social and economic objectives expressed by the public during the Timber Supply Review process, where these are consistent with the government's broader objectives as well as any relevant information received from First Nations.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Rich Coleman', with a long horizontal stroke extending to the right.

Rich Coleman  
Minister

**Appendix 4: Minister's letter of October 27, 2010**



File: 280-30/MPB  
Ref: 126097

**OCT 27 2010**

Jim Snetsinger, Chief Forester  
ADM Forest Resource Stewardship Division  
Ministry of Forests and Range  
3<sup>rd</sup> Floor, 1520 Blanshard Street  
Victoria, British Columbia  
V8W 3C8

Dear Mr. Snetsinger:

**Re: Economic and Social Objectives of the Crown Regarding Mid-Term Timber Supply in Areas Affected by the Mountain Pine Beetle**

On July 4, 2006, Rich Coleman, former Minister of Forests and Range, wrote to you outlining the social and economic objectives of the Crown for AAC determination (in accordance with Section 8 of the *Forest Act*) with respect to issues associated with the Mountain Pine Beetle (MPB) epidemic. The aforementioned letter articulated the Crown's objectives of ensuring long-term economic sustainability for communities affected by the epidemic; recovering the greatest value from dead timber before it burns or decays, while respecting other forest values; and conserving the long-term forest values identified in land use plans. I am writing to you regarding the Crown's objectives with respect to mid-term timber supply in areas affected by the mountain pine beetle.

The MPB infestation has had a profound impact on the timber supply outlook for the interior of the province. In particular, forecasts of timber supply in the mid-term—the period between the ending of the economic shelf life of killed pine and the time when the forest has re-grown and again become merchantable—are now significantly lower than prior to the infestation. These shortages threaten the wellbeing of forest-dependent cities and towns. The

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Ministry of Forests and Range and  
Minister Responsible for Integrated  
Land Management Bureau

Minister's Office

Mailing Address:  
P.O. BOX 9049 Stn Prov Govt  
Victoria, BC V8W 1X4

Tel: (250) 387-6240  
Fax: (250) 387-1040  
Website:  
[gov.bc.ca/forlmbwww.gov.bc.ca](http://gov.bc.ca/forlmbwww.gov.bc.ca)

Jim Snetsinger, Chief Forester

Government of British Columbia is working closely with beetle action committees, municipalities, and the private sector to diversify economies. However, for many forestry-dependent towns mid-term timber supply shortages could still have significant socio-economic impacts.

During this challenging time it will be necessary to reassess management objectives and administrative approaches that were developed when forest conditions in the province's interior were very different than now exist. In this reassessment it will be important to enhance the understanding of how best to balance objectives for non-timber forest values with objectives for timber supply to achieve a range of socio-economic benefits. It will also be important to assess how innovative practices and incremental silviculture could mitigate mid-term timber supply shortfalls in MPB affected areas, and if flexibilities can be found in timber supply administration.

During the Timber Supply Review process, in addition to the considerations included in the July 2006 letter, I would like you to undertake analysis that can provide information on how changes to current management practices and administration could increase mid-term timber availability in MPB-affected areas. This information should be shared with Ministry of Forest and Range Executive and used to inform discussions among interested parties, and considered by appropriate land use and management decision makers. If formal changes are made to management objectives and administration, you will be in a position to incorporate those changes in Timber Supply Reviews and AAC determinations.

Sincerely,



Pat Bell  
Minister

pc: Dana Hayden, Deputy Minister