

From: Les Molnar, Ecosystems Officer, WALP Grand Forks

To: Qiong Su, Timber Supply Forester, MOF Victoria
Robert Lincoln, Head, Ecosystems Section, WLAP Penticton
Brian Harris, Ecosystems Officer, WALP Penticton

Cc: Randy Waterous, Forestry Planner, Pope & Talbot Ltd.

Date: 02/05/2002

Subject: TFL 8, Environmental Stewardship Division Comments

We are choosing to comment only on the Stand Level Biodiversity (WLTREE Patches) Section 6.12. We have not reviewed the balance of the TFL 8 package in any detail and or do not feel qualified to comment on other sections at this time.

Please consider the following:

1. I believe the WLT patch retention requirements as shown in table 6.13 are inadequate to protect wildlife resources within the TFL.
2. Pope and Talbot practices primarily clear cutting within TFL 8 with a small percentage of single tree selection and seed tree cutting.
3. Although mature residual stems may exist post harvest in selective harvest systems, wildlife tree values are largely removed due to WCB requirements to remove danger trees. Seed tree prescriptions do provide some very limited future wildlife tree potential provided they are left on site for at least one rotation. We feel the statement that wildlife tree retention will be easily met on areas subject to uneven aged management are not valid biologically.
4. The Timber Harvesting Land Base is largely operable within TFL 8. It is a faulty assumption to assume that 50% of the Wildlife tree patches will be found outside the timber harvesting landbase. WCB regulations require that all danger trees be removed from stands under harvest, which over time severely depletes the WL Tree component of remnant stands. Similarly, constrained stands such as Riparian Reserve and Management Zones cannot fully contribute fully to wildlife tree requirements as they are subject to "sanitation" to remove dead and danger trees.
5. In Step 5 B of the quoted Provincial Wildlife Tree Policy 2000b it states clearly the following: " on subzones that are highly operable (little if any constrained area) it may be biologically necessary to set aside a higher percentage from the THLB in order to ensure sufficient WTR areas?"
6. We also are concerned that the gross percentages of WTR required before reductions have been extracted from the wrong table in the Landscape Unit Planning Guide (March 2000). We come to this conclusion because of our assumption that A3.1 numbers are lower as they assume OGMAs are spatially located in the landscape and therefore can be considered in the calculations for % area available for harvesting, thereby reducing the % WTR required. This is not the case in Boundary. At this time we do not have old growth patches laid out and there are no landscape unit objectives. Therefore should be using A3.2 until LU objectives are complete.

Please consider these comments in your review of the analysis for TFL 8.

From: Randy Waterous, Forestry Planner, Pope & Talbot Ltd.

To: Les Molnar, Ecosystems Officer, WALP Grand Forks

Cc: Brian Harris, Ecosystems Officer, WALP Penticton

Qiong Su, Timber Supply Forester, MOF Victoria

Robert Lincoln, Head, Ecosystems Section, WLAP Penticton

Date: 02/06/2002

Subject: RE: TFL 8, Environmental Stewardship Division Comments

Les,

Although the Timber Supply Analysis for TFL8 is now essentially complete, we appreciate your comments on the Stand Level Biodiversity section of the draft Information Package. We have reviewed your concerns and offer the following in response:

The Wildlife Tree Retention levels indicated in table 6.13 were derived using accepted methodology consistent with the Landscape Unit Planning Guide and current practices as directed by the District Manager of the Ministry of Forests. It is our understanding that the District Manager has determined that this methodology "adequately manages and conserves the forest resources to which it applies".

Your comment on current harvesting practices is consistent with our description of silviculture regimes that will be modelled in the timber supply analysis.

We concur that in stands subject to uneven aged management, WCB requirements lead to the removal of some wildlife trees, however this is limited to danger trees. Trees in Wildlife Tree Classes 1 to 5 and 9 may be retained, if not identified as danger trees, and will comprise a significant portion of the residual stands.

The Timber Harvesting Land Base within TFL 8 (or any other management unit) by definition is entirely operable. As noted in the Information Package, the assumption that 50% of the WTP requirement will be achieved outside the THLB, is taken directly from the Provincial Wildlife Tree Policy. It is our intent to model this policy within the Timber Supply Analysis. Any opinions or judgements of the policy will be expressed elsewhere.

You are correct in pointing out that Step 5B of the policy "states clearly the following" "...on subzones that are highly operable (little if any constrained area) it may be biologically necessary to set aside a higher percentage from the THLB in order to ensure sufficient WTR areas...". However your comment does not note that Step 5B also clearly goes on to state that "The appropriate variation between subzones should be determined cooperatively between MELP, MOF in consultation with the licensee. Regardless of the level of variation between subzones, the total wildlife tree retention hectares and THLB retention hectares should not vary when averaged across the FDP...". In the absence of any cooperatively determined variations to the default assumption, we feel it is appropriate to apply the default levels in the model.

Table A3.1 of the Landscape Unit Planning Guide was used to determine WTP requirements because we consider that to be "current practice". This assumption is based on guidance received from the District Manager of the MoF, for preparation of the currently approved Forest Development Plan for TFL 8.

We trust that the above responses adequately address your concerns.

Randy Waterous
Forestry Planner
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Boundary Timber Division

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