

File: 19710-30/TFL 8

December 29, 2000

Ken Taylor
Vice President, Woodlands
Pope & Talbot Ltd.
P.O. Box 39
Grand Forks, British Columbia
V0H 1H0

Dear Ken Taylor:

Re: Tree Farm Licence (TFL) 8 Management Plan No. 9 Review

The Chief Forester approved TFL 8 Management Plan No. 9 for the period September 1, 1997 to August 31, 2002. Following approval of the management plan, the TFL 8 agreement was replaced with a revised agreement that became effective March 1, 2000. In this agreement the process for preparing a new management plan differs considerably from the process in the previous agreement. In particular, the process now spans a 20-month time period and commences with a review of the current management plan by the regional manager.



In accordance with paragraph 2.03 of the TFL 8 licence agreement, the following is a review of management plan No. 9 and the licensee's performance in respect of that plan. In addition to this review I also will provide the details regarding the public review of the next draft management plan.

In carrying out this review I have considered the following documents:

- The Chief Forester's August 5, 1997 approval letter of management plan No. 9 and the conditions of the approval,
- Management Plan No. 9, the licensee commitments in the plan and their performance relative to meeting the commitments, and
- The Chief Forester's rationale for the allowable annual cut determination, effective September 1, 1997.

Management Plan Approval

In his August 5, 1997 letter, the Chief Forester approved Management Plan No. 9 subject to two conditions that needed to be addressed over the term of the plan.

Page 1 of 6

• THE GOVERNMENT OF BRITISH COLUMBIA IS AN "EMPLOYMENT EQUITY EMPLOYER" •

Ministry of
Forests

Nelson Forest Region

Address:
518 Lake Street
Nelson, BC V1L 4C6
Tel: (250) 354-6200
Fax: (250) 354-6250

Ken Taylor

Condition 1

The first condition required the submission of additional information outlining the licensee's management of poor site Douglas-fir/larch stands. This information was submitted by the licensee and accepted by the Chief Forester on February 1, 1999.

Condition 2

In both the rationale for the AAC determination and condition 2 of the Management Plan No. 9 approval, the Chief Forester expressed concern with the assumptions in the timber supply analysis regarding adjacency for uneven-aged management. Since the management plan indicates uneven-aged management will increase, the Chief Forester expected a refinement of the assumptions used in the timber supply analysis to characterize cutblock adjacency under different uneven-aged silviculture systems.

District staff advise this process is ongoing and in the preliminary stages. Please ensure the draft management plan and the timber supply analysis incorporates this information.

Rationale for the AAC Determination

In the rationale for the determination of the AAC, the Chief Forester indicated a number of tasks that needed to be carried out during the term of Management Plan No. 9, for the preparation of the next management plan. These tasks are noted at the end of the rationale document and are repeated below with a discussion of the progress of each task.

1. *Evaluate alternative strategies for managing deciduous and mixed stands.*

All leading-deciduous stands were deducted from the timber harvesting land base. However, due to increasing trends to more fully utilize these stands, the Chief Forester suggested a further review of alternative strategies for the management of these stands.

Please ensure the draft management plan addresses alternative strategies for the management of deciduous stands.

2. *Re-assess and compile data specific to the TFL in respect of roads, trails and landings.*

To account for future roads and landings in the timber supply analysis; a reduction factor similar to the Boundary TSA was applied to stands greater than 60 years old in year 100. Even though this method was acceptable for the Management Plan No. 9 timber supply analysis, the Chief Forester expects a method more closely representing actual operations on the TFL to be used in the next timber supply analysis.

District staff advises me that discussions on the use of site disturbance field measurements have occurred but a method to account for road and landing deductions is not yet finalized. These discussions should be continued towards an agreement on an acceptable method for

3. *Develop a plan for the management of landscape-biodiversity, incorporating all relevant West Kootenay-Boundary Land Use Plan guidelines, boundaries, objectives and prescriptions, and including designated landscape unit and biodiversity emphases.*

In preparing Management Plan No. 9, no additional area or volume reductions were made to account for biodiversity. The licensee felt that deductions for other constraints adequately provide for stand and landscape level biodiversity.

The Kootenay Boundary higher level plan order was approved and the plan will take effect on January 31, 2001. The plan is designated a higher level plan under the *Forest Practice Code of British Columbia Act*. Pursuant to Section 3 of the Act, the Boundary Resource Management Zone (RMZ) and 10 objectives for the RMZ were established. The 10 objectives will need to be considered when preparing Management Plan No. 10. In addition, the 10 objectives will be considered known information on January 31, 2001 when the higher level plan comes into effect. Any forest development plan that is submitted for approval after the four months following January 31, 2001 will need to consider the 10 objectives.

4. *Test Accuracy of site indexes applied in current analysis.*

Inventory site indexes, as a measure of site productivity, were used in the timber supply analysis. However, research indicates that site indexes for some stands underestimates actual site productivity. The results from these studies indicate a potential increase in the productivity of some stands, particularly lodgepole pine and spruce. The Chief Forester suggested further study needs to be carried out before the results can be applied to TFL 8.

District staff advises that some of the work on this study is complete. The results of the study when completed should be reviewed by ministry staff and incorporated into the next management plan if appropriate.

5. *Work with BC Environment staff to update non-timber resource inventories, particularly for wildlife habitat.*

The licensee accounted for wildlife habitat requirements through the deduction of areas with various cover constraints. They also consider MELP's draft maps of potential wildlife habitat as a guide in forest development planning. Two sensitivity analyses indicated no impact on the short-term timber supply when the constraints were increased. The Chief Forester accepted the treatment of wildlife habitat in the timber supply analysis, however, indicated the need for MELP and the licensee to work co-operatively to model MELP's wildlife habitat and old-growth needs.

District staff advises that work on an ungulate winter range project with MELP is ongoing. I encourage the continuation of this work and incorporation of the results in the next management plan and timber supply analysis.

6. *Review riparian class assignments and verify by field inspections.*

The licensee accounted for riparian habitat in the timber supply analysis by deducting an area estimate of the riparian reserves from the timber harvesting land base. However, riparian management zones were not accounted for in the analysis and riparian reserve classification was preliminary. Based on his experience, the Chief Forester felt these allowances did not fully account for riparian habitat needs and represented an unquantified downward pressure on the AAC. In the next timber supply analysis the Chief Forester expects inventory refinement and field verification of riparian classification.

District staff advises that fish inventory fieldwork is continuing, but is not yet completed. The results of the inventory work are to be utilized in the preparation of the next management plan and timber supply analysis.

7. *Evaluate and quantify by systems and species, the total amount of area that will be subject to uneven-aged harvesting systems.*

As indicated in the discussion of condition 2 in the Management Plan Approval, a refinement of the area subject to uneven-aged management by silvicultural systems needs to be completed for the next timber supply analysis.

8. *Compile data specific to the TFL for loss due to natural causes, to improve accuracy of non-recoverable loss estimates.*

To account for non-recoverable losses in the timber supply analysis, the licensee prorated by area the reductions used in the Boundary TSA. While this may be a reasonable approach since empirical data for the TFL is not available, the Chief Forester requested the licensee compile data specific to the TFL for future analyses and determinations.

District staff advises that the licensee through their work with the insect and disease committee, overview surveys and the identification of blowdown areas should have better data available to estimate non-recoverable losses for the TFL.

9. *I also expect BCFS staff to conduct an archaeological overview assessment (AOA) of TFL 8.*

An AOA was not available for use in the preparation of Management Plan 9. However, the Chief Forester found no reason to adjust the timber supply to account for archaeological, historical or heritage values, but expected better information to be available for the next determination.

I am advised that an AOA was completed in 1997 and updated in 2000. This information is to be considered in the preparation of the next management plan. If the results of the survey require exclusion of any sites, appropriate area deductions from the timber harvesting land base will be needed.

10. An additional task not included in the summary at the end of the document is the treatment of visually sensitive areas in the timber supply analysis.

The forest cover requirements of all the visual sensitive areas modelled in the base case may not be as constraining as the visual sensitivity classification of those areas requires. While the affected area may be small, there is potential impact on the medium to long term timber supply.

The analysis for the next management plan should better account for visually sensitive areas.

Management Plan Commitments

Management Plan No. 9 includes a number of commitments, some of which are also discussed by the Chief Forester in his rationale for the determination of the AAC, and have been discussed in the above section. Other management plan commitments that were not included in the rationale, or require further discussion are noted below.

1. *Maintain an updated forest inventory*

The latest timber inventory for TFL 8 was completed in 1993/94 and was completed to ministry standards. The licensee maintains a computer database of their inventory and updates of the forest cover were provided to BCPS in 1998. An audit of the inventory was conducted during the 1997 and 98 field seasons.

The results of the audit are to be incorporated into the timber supply analysis for the next AAC determination.

2. *Undertake a study to improve estimates of site index and productivity.*

I am advised that two studies are currently underway on the TFL, which may yield information that could be used in the next timber supply analysis. These include studies on dense pine stands and a site index adjustment project. Information and results from the studies, where appropriate, should be used in the next analysis.

Other Issues

In addition to the points discussed above, the following issue also needs to be addressed in the next management plan.

A recreation inventory and analysis was completed in 1995 and utilized in the preparation of Management Plan No. 9. Since the completion of the inventory and analysis there have been three events that will require minor revisions to that document, these are:

1. The announcement of the Kootenay Boundary higher level plan will result in designated scenic areas within the TFL that will require the establishment of VQOs and harvesting to meet those VQOs. The VQOs should be considered in the timber supply analysis.
2. The abandoned Kettle Valley Railway grade has been designated as the route of the Trans Canada Trail through the TFL.
3. The announcement of the Kettle River as a heritage river.

Draft Management Plan No. 10 Public Review

Part 2 of the TFL 8 licence agreement specifies requirements for advertizing the draft management plan and the time period and locations for public review of the plan. In consideration of the minimal public response to opportunities provided for the review of Management Plan No. 9, I find it adequate for the licensee to provide public viewing of the draft management plan at the licensee's offices in Grand Forks and Midway for the time periods specified in the licence agreement.

Contacts for Management Plan Preparation

The regional contact for the preparation of Management Plan No. 10 will be Don Youwe. Mr. Youwe can be reached by telephone at (250) 354-6143. Other contacts at the Boundary Forest District and the Victoria Branches are described in the attachment.

If you have any questions regarding this review please contact Mr. Youwe.

Yours truly,



Ross R. Tozer
Regional Manager
Nelson Forest Region

Attachment: 1

pc: Jim Gowriluk, Acting Director, Resource Tenures & Engineering Branch
Glen Thompson, District Manager, Boundary Forest District
Rich Heinrichs, Forest Ecosystem Specialist, Boundary Forest District

Contacts for TFL MP Preparation

TFL 8 MP No. 10 Pope & Talbot Ltd.

Submitted MP Component	Approval/Acceptance Authority, or Office of Primary Responsibility	Ministry Contact
Timber Supply Analysis Information Package with prior approval of:	TSF	
Timber Inventory	Resources Inventory Branch	Coordinator TFL Inventory 387-9521
Landscape Inventory	RM/DM	Landscape Forester Recreation Resource Officer
Recreation Inventory	RM/DM	Recreation Officer Recreation Resource Officer
Natural Stand Yield Curves	Resources Inventory Branch	Growth and Yield Officer (Predictions) 387-6043
Managed Stand Yield Curves	Research Branch	Growth and Yield Applications Specialist 387-6708
Operability Lines	DM	Planner or Timber Officer
Biodiversity	DM, MELP Official	Planner or Timber Officer and FES
ESAs	DM, MELP Official	Planner or Timber Officer and FES
Consistency with Higher Level Plans	DM	Planner or Timber Officer and FES
TYP	DM	Planner or Timber Officer
Analysis	TSF	
Draft and Proposed MP	RM	Don Youwe - 354- 6143
Related Issues		
Wildlife, watershed and fisheries issues	MELP	FES
MP Process	RTEB	Charlie Klasen - 387 - 1692
Other (specify)		