

Chief Forester Order
Respecting an AAC Determination
For Tree Farm Licence No. 26

Section 8 (3.1) of the *Forest Act* stipulates in part that

If ... the chief forester considers that the allowable annual cut ... is not likely to be changed significantly with a new determination ... the chief forester ... by written order may postpone the next [allowable annual cut] determination ... to a date that is up to 10 years after the date of the relevant last determination, and ... must give written reasons for the postponement".

In accordance with Section 23(3) of the *Interpretation Act*, the deputy chief forester is expressly authorised to carry out the functions of the chief forester, which include those required under Section 8 of the *Forest Act*. I, the deputy chief forester, have considered the factors described below and order the postponement of the allowable annual cut (AAC) determination for the reasons noted in this document.

In considering whether to postpone the next allowable annual cut (AAC) determination for Tree Farm Licence No. 26 (TFL 26), held by the District of Mission (the licensee):

- I have reviewed the licensee's April 26, 2005 letter requesting the postponement of the AAC determination. The letter outlines progress made in addressing the five issues that the deputy chief forester recommended the licensee address before the next determination.
- I have also reviewed the deputy chief forester's most recent rationale for the AAC determination for TFL 26 effective August 1, 2001. The base case harvest forecast, representing the current practice of the licensee at the time of the 2001 determination, demonstrates a stable timber supply with no mid-term decreases and incremental increases in the long-term.
- I have revisited the many factors that were sources of uncertainty in the 2001 AAC determination. For many of these factors the available information has not changed since the last determination.
 - In the reasons for decision section in the 2001 determination rationale, the deputy chief forester noted only one factor, the identified wildlife management strategy, that would act to decrease timber supply as compared to the base case projection. He also identified five other factors (deciduous stands, site productivity estimates, utilization standards, landscape-level biodiversity and water resources) that could increase timber supply.
 - The deputy chief forester decided that, in combination, the six factors would amount to about 3000 m³/year more accessible timber supply than was modelled in the base case. Consequently, he maintained the AAC at 45,000 m³ but did not attribute 3000 m³/yr to harvesting deciduous species as was done in the previous AAC determination.

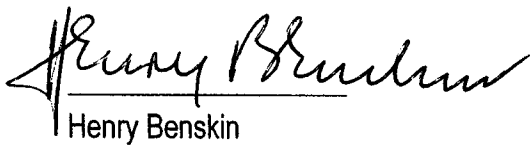
- A key question in assessing the basis for the requested postponement of the AAC determination is whether there have been any significant changes to the assumptions since the last determination.
 - The licensee has stated that pure or almost pure deciduous stands are not harvested; however, merchantable deciduous trees growing within conifer-leading stands are harvested. The licensee reported that the average volume of deciduous harvested over the last four years was only 212 m³/year. This confirmed the assumption in the base case that deciduous species do not make a significant contribution to the timber supply.
 - A very small area (1.22 ha) was deleted from the TFL in April 2003 which would have a negligible effect on timber supply for the remainder of the TFL.
 - The District expressed concern in the last determination that the volumes per hectare used as minimum harvest entry criteria were high relative to the neighbouring Fraser Timber Supply Area (TSA). The licensee supplied average harvest volume per hectare information to illustrate current practice. The licensee reported that during the period between 2001 and 2004 the average volume per hectare at time of harvest was in the 508 - 650 m³/ha range excluding waste and residue. This information was followed by the licensee's assertion that the lowest volumes per hectare at the time of harvest are not usually below 400, 500 or 600 m³ for poor, medium and good sites respectively, and that minimum volume per hectare at harvest will never be as low as 350 m³ except in isolated cases. District staff now agrees with the licensee's perspective, and the higher minimum harvest criteria will be maintained in future analysis.
 - There are no changes in the other issues identified in reasons.
- I note that of the issues remaining unchanged from the 2001 determination:
 - The implementation of improved site productivity estimates would likely have the largest impact. The licensee intends to collect localized site productivity information, using the recently completed terrestrial ecosystem mapping (TEM) as the reference for site index correlated to biogeoclimatic ecological classification (SIBEC) adjustments. The licensee's own comparisons show that inventory site indices may underestimate the site productivity on the TFL as much as 10%. This figure is considerably less than the results of a sensitivity analysis using ecologically based productivity estimates, that were summarized in the 2001 determination, and which showed a potential short-term timber supply increase of 23% and long-term harvest level increase of 22%.
 - Another unchanged and potentially significant issue is related to the visually sensitive areas. In the 2001 rationale, the deputy chief forester expressed concern over the modelling of visually sensitive areas and encouraged the licensee and British Columbia Forest Service (BCFS) staff to clarify and bring closure to the operating practices related to managing these areas. Some new information was provided by the licensee, but the issue remains unresolved from the perspective of District staff. Increasing the base case assumption of a four metre visually effective green-up (VEG) height to the five metre VEG height used in the adjacent Fraser TSA would result in a decrease of 14% from the initial harvest level after four decades. The licensee believes that the four metre VEG height is justified based on local circumstances and field experience.

- I am aware of the Province's legal obligation stemming from court decisions to consult First Nations on proposed decisions concerning various forest management matters. I have reviewed the information obtained through the First Nations consultation process undertaken by the Ministry of Forests and Range (MOFR) with the First Nations whose asserted traditional territories cover all or part of the area covered by TFL 26. The First Nations consulted were: Seabird Island Indian Band, Sto:lo Nation, and Kwantlen First Nation.
 - The letters sent by the Ministry to each First Nation, in May and July 2005, asked that I be informed about their aboriginal interests, the specific locations of these interests and how these may be impacted by postponing the AAC determination for TFL 26. A response was received from the Kwantlen First Nation and a meeting held on October 12, 2005. The AAC determination process was discussed with the Kwantlen but the concerns received were directed at the separate issue of TFL 26 license renewal. No specific feedback was obtained on the impact of postponing the AAC on the aboriginal interests of the Kwantlen.
 - I am aware that no Traditional Use Survey is available for TFL 26. However, one Archaeological Inventory Assessment was done, which studied five scheduled cut blocks, found no archaeological artifacts and assigned a low probability that such artifacts exist within the area studied.
 - Through the First Nations consultations and background information search by staff, I am not aware of aboriginal interests that may be impacted by the postponement of the AAC determination. However, if new information does arise in the future, then I will consider it carefully and may revisit my decision.

I conclude that the timber supply picture for TFL 26 remains stable and that, based on the information currently available, the AAC would not change significantly if a new determination was to be made at the present time.

Based on information contained in the 2001 rationale, I note several factors which could serve to exert upward pressure on the timber supply, especially the application of SIBEC site productivity estimates to managed stand yield tables. I strongly encourage the licensee to implement the improved productivity estimates so that the next AAC determination better reflects the full timber growing potential of these public lands. At the same time, given the proximity of the TFL to urban areas, it is equally important that the licensee and BCFS staff bring closure to operating practices for managing visually sensitive areas, and that these practices are modelled in the next timber supply analysis.

With the foregoing in mind, I consider the licensee's request for a postponement of 5 years as rather longer than is appropriate to resolve these questions as they relate to planning the use of public resources, and my decision is to extend the current AAC determination deadline by 3 years from August 1, 2006 to August 1, 2009. I am authorized to rescind this order under Section 8(3.2) of the *Forest Act* if I conclude that circumstances on the TFL that influence timber supply have changed significantly during the interim.



Henry Benskin
Deputy Chief Forester

29 May 2006

Date