

Chief Forester Order Respecting the AAC Determination for the Cranbrook TSA

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, then ... the chief forester by written order may postpone the next 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 October 2005, I determined a new allowable annual cut (AAC) for the Cranbrook Timber Supply Area (TSA). The current AAC, effective November 1, 2005, is 904,000 cubic metres. This AAC excludes a temporary uplift of 70,000 cubic metres which remained in place until January 1, 2007 to complete the salvage of timber from the 2003 fires. The AAC maintains the partition set on January 1, 2001 for 33,000 cubic metres per year of harvest to come from marginal stands outside of the THLB. The conventional harvest AAC from the THLB is 871,000 cubic metres.

In considering whether to postpone the AAC determination for the Cranbrook TSA, I have reviewed:

- each of the factors potentially affecting timber supply on the TSA;
- the *Cranbrook TSA Rationale for AAC Determination*, dated October 12, 2005;
- the *Cranbrook TSA Timber Supply Area Analysis Report*, dated May, 2004; and
- the First Nations consultation process that covered the period from May 15, 2008 to July 13, 2008.
- Information and discussion with Rocky Mountain Forest District staff during a July 16, 2008 field tour of the TSA.

I note the base case timber supply forecast in the 2004 analysis report projects that an annual harvest of 838,000 cubic metres could be maintained for the next 30 years after which timber supply declines in 2 steps, to a harvest level of 767,000 cubic metres per year by the fifth decade then increases to a long-term level of 841,000 cubic metres per year. Several factors identified after the base case was developed indicated that the timber supply could be higher than was projected in the base case, although future impacts of the mountain pine beetle infestation could offset these differences.

In the 2004 analysis the growing stock associated with the timber harvesting land base decreased from an initial level of about 48 million cubic metres to about 37 million and then increases to about 44 million in the long term. The extensive growing stock throughout the planning horizon contributes to the robust timber supply forecast projected in the base case.

In my 2005 rationale, I discussed the impact and interaction of key factors affecting timber supply in the short, medium, and long terms. I have reviewed each factor specified under Section 8 of the *Forest Act* and have also discussed current practice and the availability of new information with Ministry of Forests and Range (MFR) district and branch specialists. I am aware that since the last (2005) determination:

- There are no land use decisions or new data available that significantly changes the size of the timber harvesting land base (THLB) assumed in the 2004 analysis.
- Unsalvaged losses over the past 3 years are within the range of variation of those considered in the last determination.
- New log grades were implemented for BC's Interior on April 1, 2006. To better account for all harvested volumes in AAC cut control, logs that were previously considered grade 3 endemic or grade 5 are now charged to the AAC. MFR staff estimate that dead potential and lumber reject logs represent about 11% of the harvest, however in practice, actual volumes harvested in aggregate rarely exceed inventory volume estimates.
- The three most important factors affecting timber supply in the previous analysis were:
 1. Site index adjustments were not part of the base case. Sensitivity analysis using preliminary estimates of SIBEC adjusted site index for managed stands suggests that the current harvest level could be maintained for the next 100 years and the long-term timber supply could be 15% higher than was projected in the base case.
 2. Ungulate winter range and caribou management requirements were revised prior to the determination meeting and are significantly less restrictive than those modelled in the base case. The net impact of the new guidelines increases the timber supply by up to 10% over the base case projection. .
 3. The impact of mountain pine beetle on reducing timber supply continues to be uncertain. The population of mountain pine beetle in the TSA is currently stable, but according to the provincial projection the population will continue to increase and will likely peak in the next few years. I have asked district staff to continue to monitor the situation.

I am aware of the Province's legal obligation to consult with First Nations on proposed forest management decisions. I have reviewed the information obtained through the First Nations consultation that was undertaken by the MFR with those First Nations whose asserted traditional territories overlap with the Cranbrook TSA. I note that:

- The First Nations that have overlapping territory with the Cranbrook TSA include the Shuswap Indian Band and the Ktunaxa Nation Council who represent three bands that reside in the Cranbrook TSA: the Akisq'nuk First Nation, St. Mary's Band and the Tobacco Plains Indian Band.
 1. The Ktunaxa Nation Council with its representative bands and the Shuswap Indian Band signed FRO agreements in 2006 that cover the Cranbrook TSA. Two NRFL's have been issued within the Cranbrook TSA – one to the Ktunaxa Kinbasket Development Corporation representing the St. Mary's Band and one to the Tobacco Plains Indian Band, with a total volume of 74,030 cubic metres over 5 years.
 2. Areas of significant interest to First Nations exist within the TSA, however measures have been designed to address First Nations' concerns and to continue with forest operations.
 3. Numerous archaeological sites (as defined by the *Heritage Conservation Act*) exist throughout the TSA. To a large degree forest operations have been adjusted to protect archaeological values.
 4. A pilot has been occurring with the Ktunaxa Nation Council for a domestic timber management opportunity. The total volume that may be affected is likely to be small in relation to the overall TSA AAC.
 5. Letters were sent to First Nations with aboriginal interests within the TSA requesting information regarding the decision to postpone the AAC on May 15, 2008. No written responses were received. A conversation with a representative of the Ktunaxa Nation Council Lands and Resources Agency on June 19, 2008, indicated that the agency has limited capacity to respond to referrals. The representative also indicated that the Ktunaxa Band Communities are in the same position in this matter. The representative indicated that the Ktunaxa Nation Council only responds to referrals that trigger a high interest.

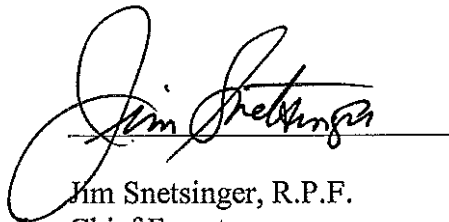
After reviewing the information, I am satisfied that the First Nations whose asserted traditional territories overlap with the Cranbrook TSA were consulted on the postponement of the AAC determination. Through the consultation process I am unaware of aboriginal issues that may be affected by a postponement of the next AAC determination. I note that district staff will

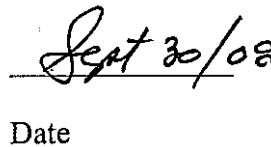
continue to be available to consult with First Nations on specific operational planning and other issues.

The information available to me indicates that current management practices are consistent with sustainable management of timber supply and of other forest values. If however, any new information does arise, I will consider it in the next AAC determination.

In summary, based upon my review of the factors discussed in the 2005 rationale, the limited changes since the last determination, my knowledge of the timber supply dynamics of this management unit, and the field tour conducted on July 16, 2008, I have determined that the AAC for the Cranbrook TSA would not likely change with a new determination.

Under my authority as outlined in Section 8 (3.1) of the *Forest Act*, I hereby postpone the next AAC determination to a date prior to November 1, 2015, which is 10 years since the last determination. If significant new information is made available to me, or if major changes in management assumptions occur, then I am prepared to revisit the next determination sooner than the maximum 10-year period indicated in the legislation.


Jim Snetsinger, R.P.F.
Chief Forester


Date

