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And

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Dear Sirs:

Thank you for meeting in person and by telephone with representatives of the Burns Lake Community Forest (BLCF) on December 15, 2015, to discuss ongoing challenges to implementation of the April 2016 AAC determination for the community forest.

Background:

Provisions in the April 2016 AAC determination established "restricted areas" on the timber harvesting landbase (THLB) within which no timber is eligible for harvest. The restricted areas include timber stands in landscape connectivity corridors, 'Retention' and 'Preservation' VQO's, and wildlife habitat for moose, deer and grizzly bear. In addition, timber stands on the THLB but outside of restricted areas that are less than 70% dead (all species) by volume are not eligible for harvest. Live and dead timber in the restricted areas and in stands that are less than 70% dead outside of restricted areas represents a very significant proportion of the mature timber on the THLB.

For reasons explained in the AAC rationale, in the course of making the determination the decision maker found it necessary to set aside important parts of the timber supply analysis base case submitted by the BLCF as part of Management Plan 3, and to replace and augment it with information and analysis prepared by ministry staff. The information upon which the decision maker relied to make the determination is, therefore, a combination of information provided by the BLCF with Management Plan 3 in accordance with the community forest agreement and information provided by ministry staff. In addition, facing a ministry deadline to submit Management Plan 3 by the end of January 2016, the BLCF had hoped to submit the Management Plan 3 AAC request based on the updated VRI which the ministry originally planned to release in the fall of 2015. Due to delays in the release, the BLCF was forced to proceed with Management Plan 3 using the VRI version available in late 2015 to meet the January 2016

deadline for submission of Management Plan 3. At present, the BLCF and the ministry have the benefit of the updated VRI which was eventually made available to the BLCF in September 2016.

The concepts in the AAC determination of 'restricted areas', and a salvage program focused narrowly on stands with the greatest damage, were not contemplated in the submission of Management Plan 3, which was the impetus for the new AAC. In addition, the AAC request letter that accompanied the management plan submission requested that a partition not form part of the AAC determination. The BLCF is not aware of any consultation on these issues between the submission of the management plan and the issuance of the AAC determination.

December 15 Discussion:

In light of the timber harvest restrictions described above, the effect of the resulting AAC determination is that timber harvesting is to be confined to timber stands greater than 70% dead by volume outside of restricted areas, a subset of the 'normal' THLB. In addition, an AAC partition is established limiting the live timber harvest to a maximum of 45,000 cubic meters per year.

In an effort to 'operationalize' the AAC, the BLCF (Forsite) prepared the December 8, 2016, report "Burns Lake Community Forest MPB Salvage Chance Planning" report which has been shared with the ministry and was discussed during our meeting on December 15<sup>th</sup>. The conclusion from the methodology applied is that a total of 279,114 cubic meters of timber can be scheduled for harvest over the first 2 years, far short of the 900,000 cubic meter maximum harvest enabled by the 4-year AAC period. The analysis outlines the portion of that harvest which can be scheduled in complete consistency with the AAC determination, and further found that a portion of the volume can only be realized by exceeding the live timber partition to a degree, by removing some volume from retention VQO areas and by harvesting some stands that are between 50-70% dead by volume.

In light of the adverse operational implications implied by the result above, at the meeting on December 15<sup>th</sup>, the BLCF and ministry agreed on the following course of action in the near term:

1. Beginning prior to the impending holiday season, representatives of the BLCF, Forsite and the ministry analyst that supported the AAC decision maker will start work to understand the causes for the large differences in the timber harvest/salvage opportunity estimated in the BLCF information submitted with Management Plan 3, the information and analysis prepared by the ministry to support the AAC decision and its focus on stands greater than 70% dead, and the Forsite MPB Salvage Chance Planning report;
2. To enable short term harvest operations to move forward, the director suggested that the BLCF plan operations based on the Year 1 opportunities identified in the Forsite MPB Salvage Chance Planning report, which does not entail operations in areas constrained by Retention VQO's. As Year 1 of the plan includes some stands that are greater than 50%

dead but less than 70% dead by volume, the director suggested that the BLCF schedule operations first in stands that are greater than 70% dead before stands that are 50-70% dead. The BLCF will assess the extent to which the director's suggestion is operationally and economically feasible in light of the scattered, small patch nature of the subject harvests, and the mobilization, demobilization, access and other implications of the suggestion;

3. The BLCF will determine the timber volume that would be necessary to delete from the short term harvest schedule to avoid exceeding the live timber partition in the AAC determination and will report the result to the regional executive director and director;
4. During the problem solving work described above, the BLCF will ensure short term harvest operations take place without exceeding the live timber partition;
5. When the results of the investigation described in 1. above are available, the ministry and the BLCF will discuss their implications to the current AAC determination (if any), next steps, and the appropriate response to the investigation.

The BLCF trusts that the actions above correspond to your understanding of our discussion on December 15<sup>th</sup>, and would appreciate hearing if it does not correspond in any important respect. We appreciate the time you are dedicating to this current challenge, and look forward to finding a mutually satisfactory way forward.

Sincerely,

Frank Varga  
General Manager, Burns Lake Community Forest

cc. Jevan Hanchard, District Manager (acting), Nadina Natural Resource District