



Woodlot Salvage Permit Policy and the Effects on Managing Forest Health

Complaint Investigation 070784

**FPB/IRC/145
September 2008**

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The Investigation

Introduction

In July 2007, a woodlot licensee in the Central Cariboo Forest District (the complainant) filed a complaint with the Forest Practices Board saying that a recent change in the Ministry of Forests and Range's (MFR) policy on issuing salvage permits would create a forest health risk on his woodlot.

Background

The complainant has a woodlot licence on Crown land adjacent to his private land parcel. The forest in the woodlot is dominated by Douglas fir, with small amounts of lodgepole pine and spruce. As with many of the Douglas fir stands in the interior, the stands in the woodlot licence have a high degree of bark beetle infestation. The beetle bores into the bark, and heavy infestations can kill the tree. Trees that are weakened by drought, disease or other agents are more susceptible to bark beetle attack and are therefore more likely to facilitate the spread of the infestation.

Woodlot licences in the interior of the province are typically 600 hectares in size—though recent changes to legislation have doubled that to 1,200 hectares for new licences. Each woodlot has an allowable cut assigned, and normally harvesting is done under cutting permits. To maintain the health of a stand and prevent the continued spread of insect or disease agents, such as the mountain pine beetle or the Douglas-fir bark beetle, the general practice is to remove the infested trees before the beetles have a chance to leave them and attack healthy trees. To expedite the harvesting of diseased or damaged trees, this type of harvest is often done under a separate salvage permit.

In the past, MFR issued woodlot licensees a blanket salvage permit for their entire woodlot licence area, authorizing them to harvest dead or damaged trees as they came across them. In December 2006, however, the deputy minister issued revisions to the existing policy on blanket salvage permits for woodlots.¹ These policy revisions reduced the area that could be authorized under a permit, from the entire woodlot to small openings and individual groups of damaged trees within the woodlot. In addition, as a result of MFR's shift to electronic forest management, licensees were required to submit a digital file providing the spatial location of each individual opening to MFR before a permit could be issued.

In the past year, the complainant focused on harvesting damaged trees under his blanket salvage permit. His management plan commits him to work on frozen soils, with an operating season from October to February.

¹ Ministry of Forests and Range, "Blanket Salvage Permits for Woodlot Licensees," memorandum, Dec. 21, 2006.

Following the new policy, the local district decided not to extend the licensee's existing blanket salvage permit. Instead, the new policy requires that the individual openings to be created must be identified on the Exhibit "A" map accompanying the blanket salvage permit application. These openings can be clearcut cutblocks up to five hectares with provisions for 15 hectares where damage levels are at least 70 percent of the stand. With selective harvesting, areas greater than five hectares can be approved if the volume does not exceed 2,000 cubic metres, or 5,000 cubic metres for the heavily damaged stands.

Damaged or attacked trees located outside of the identified openings can only be harvested if the licensee gets an amendment to a permit. Any opening created that is greater than one hectare generates a free-growing obligation for the licensee. After the complaint was filed with the Forest Practices Board, the forest district allowed the complainant to submit an application identifying seven 50-hectare openings.

Discussion

Section 52 of the *Forest and Range Practices Act* (FRPA) prohibits a person from harvesting or removing timber from Crown land unless authorized to do so under FRPA or the *Forest Act*. A woodlot licensee therefore requires a permit to salvage insect-attacked trees. The Board's interest in this complaint is the management of forest health issues on the woodlot. This investigation considered whether there is a potential impact on forest health due to the December 2006 policy on issuing blanket salvage permits.

How does the policy affect the complainant?

For the complainant there are two specific issues related to the new policy:

The first is the requirement for a digital map. Under the new policy that restricts the area that can be applied for to relatively small areas, a licensee would likely need to submit numerous applications to cover the salvage areas, regardless of whether the areas are greater than one hectare. In the complainant's case, he applied for seven areas under one letter permit and had to hire a service provider to digitize the maps. The cost of having someone identify the sites with a global positioning system (GPS), and to have someone create a digital map, increases the likelihood that a licensee will choose to leave or delay harvesting the trees. Apart from the cost, the new requirement is inefficient for the licensee and, presumably for MFR as well.

The second, and more significant, issue for the complainant is the requirement to amend permits or apply for new ones if new areas requiring salvage are found. The complainant explained that infestations are typically scattered throughout the woodlot, and that new infested trees are often found during normal harvesting operations. He said that it was difficult to know where all salvageable trees were at any given time, such as upon application for a permit. This was demonstrated during the investigation field trip when several trees were found that had not been included in the seven areas under the complainant's new permit. MFR staff said that they found a similar situation in another woodlot. Under the policy, the

complainant would be required to leave those trees and apply for an amendment to the salvage permit.

Windthrow is a common event and can happen at any time during the year. It also creates a salvage situation. Strong winds brought down trees on the complainant's woodlot after the current salvage permit was issued. If those trees are outside of the permit areas, which is likely given the small size of the areas, an amendment is required. The district decision to exceed the policy limits has alleviated this somewhat.

The forest district staff said the amendment process would take a minimum of two weeks. The complainant said that, in that time, he likely would have finished harvesting an area and moved the equipment elsewhere on the woodlot, making it not practical to come back and take the damaged trees.

The effects on the complainant are the loss of flexibility and timeliness in how he can address salvage situations on the woodlot.

Is there a forest health concern?

As policy only allows small areas to be in a permit application, and the applicant must know the harvest locations in advance, the complainant asserts that damaged or infested trees will be left on the woodlot.

In the Central Cariboo Forest District, the fir bark beetle is considered at an epidemic level. The provincial Douglas fir bark beetle plan classifies the management units within the district, including the complainant's woodlot, as requiring 'aggressive' management, with an objective of removing 80 percent of attacked trees. Provincial guidelines are that all current attack in this area should be addressed within two years.² A MFR forest health specialist agreed that the aggressive approach requires operators having flexibility to harvest infested trees promptly.

If licensees have to leave individual trees, or, as reported by the complainant, if some licensees abstain from salvage, this will increase the forest health risk on the woodlot. Leaving infested trees will facilitate the spread of the fir beetle within the woodlot (or the pine and spruce beetles in other woodlots). This is a concern for the management of the stands within a woodlot, and also for the district, as unsalvaged beetle-attacked trees provide a source to spread elsewhere.

Finding

It is the Board's opinion that the December 2006 blanket salvage permit policy creates a risk to forest health because it inhibits aggressive salvage harvesting.

² Provincial Bark Beetle Management Technical Implementation Guidelines. Spring 2003.

The requirement for spatial information in a permit application is driven by MFR's Electronic Forest Management Initiative (e-FM), a move to conduct business and share information with licensees electronically. Permits are created through a Forest Tenures (FTA) database. FTA requires a spatial file describing the opening boundary before a permit can be issued. This allows MFR to ensure that new applications do not overlap with existing harvest authorizations.

Licensees must reforest all harvested areas (openings) within their woodlot licence area, but are only required to track openings that create a free-growing obligation (greater than one hectare). Those silviculture obligations are tracked through the Reporting Silviculture Updates and Land Status Tracking System (RESULTS) database and linked to the spatial information in FTA. A post-harvest submission identifying these areas must be made on RESULTS, but this first requires the spatial file in FTA. The requirement for spatial information does not explain the reduction in the allowable permit area from the entire woodlot to small patches. Presumably a 600-hectare submission would meet the spatial requirement for FTA.

One reason for no longer allowing entire woodlots to be included in a permit appears to be that MFR is cautious about losing control of where licensees are operating. Licensees could fail to report insufficiently restocked areas greater than one hectare, a situation that could occur under any forest licence. By requiring a spatial data submission before issuing the salvage permit, MFR knows where the licensee is harvesting and can later check to see if there are any unreported insufficiently restocked areas greater than one hectare.

However, there appears to be little risk of this with woodlot licences as they are area-based tenures rather than volume-based tenures like those of most major licensees, and woodlot areas are relatively small compared to areas under major licences or small business salvage licences. Central Cariboo Forest District staff acknowledged that woodlots were low risk for compliance and enforcement concerns. The district manager said that no woodlot compliance issues had been brought to him for decision. A 2007 report by the Federation of BC Woodlot Associations compared compliance actions on woodlots against such actions on other licences, including small-scale salvage licences, for 2005 and found that woodlot licensees had the fewest enforcement actions per million cubic metres.³ As well, MFR knows that harvesting is occurring within a 600-hectare woodlot area, because notification of commencement of harvesting is required by the *Woodlot Licence Planning and Practices Regulation*.

Finding

The requirement to submit a digital spatial file with each permit application is a result of MFR's electronic management program. The size restriction on areas included in a permit application is a measure to keep track of where harvesting is occurring, thereby reducing the risk that areas with free-growing obligations will go unreported. Nevertheless, that risk is low for woodlots.

³ Federation of BC Woodlot Associations, "Report on BC's Woodlot Licence Program," Nov. 2007.

In May 2008, MFR released the results of a forestry regulatory review process that began in January 2008. MFR decided to reconsider issuance of blanket salvage permits for entire woodlots to make woodlot licensees more efficient at salvage, and to save time and effort in permit applications. Implementation details were not yet developed. In August, the ministry posted a bulletin on its website stating that the district office will produce the initial spatial information and initiate the blanket salvage permit in those instances where no free-growing obligations are created. This decision may resolve the spatial submission aspect of the complaint.

The bulletin also states that a paper-only submission by the licensee, and a letter authority from the district office, should be used for those areas with no free growing obligation. Districts can apparently continue with whatever process they previously used to issue blanket salvage permits. Even though it is contrary to the December 2006 policy, some districts continue to issue blanket salvage permits for the entire woodlot. The Central Cariboo Forest District did not, but now intends to, issue the complainant a letter permit that should provide him the flexibility to address single tree and small group salvage situations without requiring an amendment to the permit. This may resolve the issue for the complainant.

The Board is encouraged with the procedural revisions that MFR has implemented, as the changes should simplify things for the complainant and other woodlot licensees. However, the Board remains concerned that there is a conflict between the official December 2006 policy which remains in place, and the administration practices of the districts which the ministry supports to resolve the problems. This disparity between official policy and the current advice to districts, and inconsistent approach between districts, could result in confusion and problems in the future for both the districts and the licensees.

Conclusion

The Ministry of Forest and Range's December 2006 policy created administrative hurdles for addressing forest health issues on a woodlot. It increased the risk to forest health by reducing the flexibility that woodlot licensees have to remove damaged and infested trees. Given the apparent low administrative risk with woodlots, the Board questions whether the pre-harvest spatial information requirement, and the December 2006 policy restricting the size of individual areas included within a salvage permit, are necessary for woodlots.

The recent decision by MFR to reconsider its approach to issuing blanket salvage permits for woodlot licensees, and to have the forest districts provide the initial spatial file requirements, may resolve much of the complaint. However the Board remains concerned with the continuing conflict between official policy and practice.

Recommendation

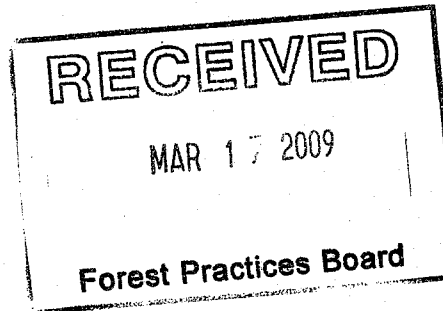
Under section 131(2) of the *Forest and Range Practices Act*, the Board makes the following recommendation:

The Ministry of Forests and Range should consider removing the December 2006 policy on salvage permits for woodlots, or amending it so that it is consistent with the administrative practices within forest districts. Whichever process is chosen for the administration of blanket salvage permits, it should provide woodlot licensees with as much flexibility as is reasonable to adequately address forest health issues as they arise in the long term.

Under section 132 of the *Forest and Range Practices Act*, the Board requests that the Ministry of Forests and Range respond in writing to the recommendation by March 31, 2009.

File: 23060-070084
CLIFF#119391

MAR 12 2009



Dr. Bruce Fraser, Chair
Forest Practices Board
3rd Floor, 1675 Douglas Street
PO Box 9905, Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Dr. Fraser:

Re: Complaint Investigation 070784 - Woodlot Salvage Permit Policy and the Effects on Managing Forest Health

On behalf of the Ministry of Forests and Range (MFR), please accept this letter as government's response to the recommendations and conclusions in the Forest Practices Board's Complaint Investigation 070784, *Woodlot Salvage Permit Policy and the Effects on Managing Forest Health*, September 2008.



The recent changes to administrative procedures regarding blanket salvage permits for woodlots (http://www.for.gov.bc.ca/mof/InterpretiveBulletins/issue_6.pdf) as part of the Forest Regulatory Review, and the December 1, 2008, change to pricing for woodlot licences to a tabular rate regime, have addressed the Board's concerns regarding woodlot licensees flexibility to adequately address salvage harvesting and forest health concerns on woodlots. In addition, as noted in the investigation report the recent decision for forest districts to provide the initial spatial file requirements for woodlot licences will resolve much of the complaint.

Recent discussions, regarding salvage on woodlots, with the Federation of BC Woodlot Associations (FBCWA) attest that this is indeed the case and that no further change is warranted. The MFR, through monthly communications with the FBCWA, will keep apprised of woodlot salvage processes and operations, and revise policy and procedures as warranted.

The MFR participates on a Joint Working Group (JWG) with the FBCWA. The goal of the JWG is to identify issues affecting the woodlot program and licensees, to resolve these issues,

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Dr. Bruce Fraser, Chair

and to streamline processes as warranted with existing resources. The MFR is committed to continuously improving the efficiency of tenures and operations, and has a long working relationship with the FBCWA to ensure woodlot opportunities and management move in that direction.

If the Board has any questions regarding government's response, please contact Ron Greschner, Senior Timber Tenures Forester, Ministry of Forests and Range, at 250-371-3794.

Yours truly,



T.P. (Phil) Zacharatos, R.P.F.
Assistant Deputy Minister
Operations Division

pc: Jim Snetsinger, Chief Forester
Bob Friesen, Assistant Deputy Minister, Tenure and Revenue Division
Jim Langridge, Director, Resource Tenures and Engineering Branch
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THE WOODLAND ALMANAC



www.woodlot.bc.ca

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PHOTO: DEBORAH GREAVES

(L — R): Chris and Jennifer Cunningham and Dean Bodman. They have shown that woodlots can be examples of how small, community-based businesses can thrive. It's a message that resonated with AGM attendees as well; the Cunninghams gave a pre-AGM tour of their ranch and woodlot, and 15 people attended.

A hilltop Eden

Jay Springs Ranch and Woodlot 311

by Deborah Greaves

When you drive along the highway that traverses the city of Kamloops and glance up at its golden grassland hills, you may not think of what lies far above. Though the slopes near the city are grassland studded by pine trees, at a higher elevation there's another world.

When you cross over from the highway to ascend the mountainside to the northeast of the city, there's an almost immediate sense of being away. The bustling city of Kamloops disappears as you climb the winding road and enter into a world of greener, densely-treed mountainside that makes the bunchgrass ecosystem you left behind seem like a place you

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www.woodlot.bc.ca

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Letters from licensees: Your views

Minister's \$10,000 award: Dream or nightmare?

Editor:

By now you have probably heard of Minister Pat Bell's offer of \$10,000 if you shorten rotations and increase your annual allowable cut. There is even an offer of carbon credits for the extra cut produced.

Perhaps I should pinch myself and see if I'm dreaming.

Not only do you get your extra cut, but you are also contributing to carbon sequestration. Talk about a big time win-win.

Don't pop the cork too soon, though. I recently read a report from Rick Brown on the Defenders of Wildlife (2008). The report has over 200 citations in the bibliography and seems to me a fairly good review of mitigation strategies.

Looking at shortened rotations as a carbon sequestering strategy, the report is critical of the time frame to actually reach the goal of becoming a carbon sink. Only after several rotations is there a suggestion of a net sink.

Why is this a problem, you might ask?

Perhaps one should go to the Millennium Ecosystem Assessment website. This study was done for the United Nations and has several 500-800 page reports. There is a summary at the website.

Apparently our world is on track to warm up 3 to 4.5 degrees Celsius over the next hundred years.

At this rate of warming, all the 24 ecosystems are expected to get ham-

pered, resulting in major species extinction and possibly swinging us into an ice age.

The result will be a world capable of sustaining only a fraction of the current population.

Based on this report, our government has adopted a mitigation strategy that moves us towards carbon sequestering over the next few years in a big way.

Because of the delayed effect of carbon in the atmosphere, the time frame to move is by 2020. The goal of our government is to achieve 80% of 2007 levels of carbon into the atmosphere by 2020. (Presentation by Tim Lesiuk, Government of BC Climate Change Secretariat, at Kalamalka College, October 25, 2008)

The short rotation, higher cut strategy model is ill-suited as a mitigation strategy capable of meeting these targets. The short rotation model will actually increase carbon to the atmosphere in the next 20 years with the promised higher levels of cut.

The irony of the \$10,000 award is that management that retains mature and older forests with partial harvests has been identified as the best mitigation strategy for carbon sequestration



PHOTO: ALVIMANN, WWW.MORGUEFILE.COM

over the next 20 years (Rick Brown report), and the least likely to win the award.

The good news is that the Minister has left the criteria for the award up to us.

I like the suggestion jokingly offered at our Directors' meeting after the AGM: "Word the criteria such that the President of the Federation wins."

The expense of travel and time would be covered by the award, and we wouldn't have the divisiveness the award is sure to cause. — Fred Newhouse ♦

In changing times, adaptive management worth considering

Editor:

Adaptive management is a systematic process for continually improving management policies and practices by learning from the outcomes of operational programs.

Decisions about how to use our land and water are among the most complicated and critical decisions that we are called upon to make.

One needs to listen to other resource users' concerns, and then try to figure out a way to implement innovative approaches to accommodate the concerns with the minimum impact on your ability to provide for a healthy vigorous ecosystem.

Change is inevitable, landscapes and human understanding are constantly

(Continued on page 4)

Adaptive management: We need to be able to anticipate change

moving forward through time on the foundation of the past, and that what appears to be a disaster may actually harbour astonishing new opportunities.

I believe that we must learn to capitalize on what's been learned previously, and think outside the box to try out new approaches.

We cannot escape from the ultimate dilemma that our forest knowledge is based on the past, while the decisions we make will impact the forests of the future. We should not try to relive our past, but strive to move into our future.

We do this by starting to plan ahead, anticipating change rather than reacting to it. We must learn to propose rather than oppose changes in how we do things. We need to promote resilience to change, not resist it; this in turn will enable ecosystems to absorb disturbances without undergoing fundamental change.

We should not have to prove that something works before we can get plans approved that are not the "status quo" or accepted practices of the day. Many of these proposals may be the result of thinking outside of the box, and they just might work!

Sometimes the solution consists of looking at the same thing as everybody else and thinking and seeing something different.

The terms *restoration* and *recovery* imply a return to former conditions, but for many areas and forest management approaches, there is no going back, only going forward. The way we diversify our management now will

undoubtedly play an important role in this adaptation or shift to other species where required.

We must diversify to manage for uncertainty. The rate at which the climate actually changes will play a key role in how or if a species adapts, or even survives. Hopefully, as we consider our own survival and adaptability, there will be a shift to managing proactively to facilitate resilient ecosystems. Proactive management recognizes that the climates may change faster than species and entrenched attitudes can adapt on their own.

As our forests store enormous quantities of carbon that contribute to the overall health of the environment, and indeed the human species itself, maintaining the health and productivity of our forests takes on a new and important aspect of our management as stewards of the public forests.

To anticipate change and plan accordingly requires science and the forest industry to stay apace of change, so we can make informed decisions. Our decisions and actions will be critical in facilitating adaptation to climate change and mitigation efforts.

We need to shift our thinking to managing for future processes and ecosystem services, rather than for perceived desired conditions frozen in time. We need to spend our time and effort trying to figure out how we can make things work, instead of spending all our efforts explaining why we should not try something new.

"There are many ways of know-

ing." (from a publication of the Pacific Northwest Research Station.) The scientific method is one way. Learning through doing is another. Thoughtful reflection and storytelling are another.

With these ideas in mind, some questions come to the forefront. Will the Forest Service or the forest industry be the key players providing the role as the "steward of the scientific process"?

I believe that woodlots can play a role as stewards of the "learning through doing" process. Perhaps the First Nations are the people to lead the storytelling vision forward.

In order to maximize the carbon storage capacity of our forests while reducing the risk of loss from catastrophic fire, insect and disease problems, I do believe that we all need to work together to ensure that our forests are healthy and growing to their optimum.

We (especially the decision-makers) cannot afford to be afraid of failure, as those who have never made any mistakes, have never tried anything new.

In the most effective form, "active adaptive management employs management programs that are designed to experimentally compare selected policies or practices, by evaluating alternative hypotheses about the system being managed" (Forest Practices Branch website). I am not sure if that last sentence is the storytelling portion or the scientific method, as I do not have a clue what they are talking about, but it is worth quoting!

George Delisle, Boundary Woodlot Association, Woodlot # 411 ♦

■ Message from the President of the FBCWA

Another great AGM

By Cliff Manning

Wow, another woodlot AGM has come and gone! Many thanks to Cathy McClary and the organizing committee for their outstanding work in the preparation and running of the meeting in Kamloops, October 2 - 4, 2008. The theme of our AGM was "Woodlots: Facing the Future."

Although attendance was lower than usual, those who did attend appreciated the full agenda and choices of events, including field tours, breakout sessions, business meetings, guest speakers, and the announcement from the Minister of Forests, Pat Bell.

A note of thanks to Colleen MacLean-Marlow, the Ministry of Forests and Range, and Forsite Consulting for the RESULTS Training that was provided in conjunction with the AGM. Licensees were encouraged to bring their own data to be entered and those who did left very satisfied.

We should also thank those who have served as volunteers in the Federation for many years. Kathy Mayes, who has been very involved as Treasurer and has served for close to 10 years, decided to hand over the reins to Nancy Pezel. Miles Fuller and Brent Petrick are two others who have volunteered more than five years of service and continue to do so.

Carmen Wheatley, who recently left her position of FIA Coordinator, has been involved with the Federation for almost 10 years as well.



Cliff Manning
FBCWA President

On behalf of the FBCWA Executive and the membership, we say "thank you" to all of you, for the hours you have given to make this program a success. One person at the AGM summed it up nicely by saying, "We, as woodlotters, are very lucky to have such a caliber of people working on our behalf."

The exciting position of Vice President was accepted by Shawn Flynn, of Port Alberni. New FBCWA Directors are Mark Clark of Prince George and Nigel Ross of Campbell River.

We welcome Nancy Pezel to the position of Treasurer of the FBCWA and also as the FIA Coordinator.

And finally I'd like to wish you a Merry Christmas and a prosperous New Year! ♦

FBCWA Vision

Woodlot holders/owners will participate in a healthy and diverse forest industry with woodlot licenses and private forest lands, making significant contributions to local communities and providing a sustainable supply of forest products.

The FBCWA will have a voice in forest and economic policy.

BC's woodlots will be models of forest management excellence, and world-renowned for their social, economic, recreational, cultural, and educational contributions to rural communities. ♦



PHOTO: BRIAN MCNAUGHTON

Cliff Manning, FBCWA President, and Pat Bell, Minister of Forests and Range, during the Kamloops AGM, held October 3—5 at the South Thompson Inn.

Major decisions took place at AGM

By Brian McNaughton

Pat Bell, Minister of Forests and Range, made two announcements on October 4 at the Annual General Meeting in Kamloops.

The first was that woodlot licence stumpage will shift to community forest rates effective December 1, 2008; i.e., interior woodlots will pay 15% of table 6.1 (Interior Appraisal Manual), while coast woodlots will pay as per table 7.2 of the Coast Appraisal Manual (30% of table rates).

At the time of writing this report, implementation and transition provisions were being worked out.

The second announcement was a Minister's Woodlot Award of Excellence, starting in 2009, to recognize a woodlot licensee who has excelled at improving forest productivity and utilization.

The Minister also announced \$10,000 in prize money! Association directors have been asked to nominate a few people who are interested in working with the Minister's staff to design the award criteria and the process to decide the winner(s).

For those not able to attend the AGM and hear the General Manager's report firsthand, here is a summary:

Forestry Roundtable

The Forestry Roundtable is on target to submit its recommendations to Cabinet in December. The Federation made a written submission on July 23, 2008,



Brian McNaughton,
General Manager

entitled "Small Offers BIG Opportunities: Realizing the Untapped Potential of BC's Woodlots and Woodlot Licences." The submission is available on the Federation's website.

Since then, the FBCWA has responded to a series of questions proposed by the roundtable on Aug. 15, 2008. As well, Lisa Marak and I met with the roundtable on Sept. 11, 2008. We gave a brief introduction, then answered their questions.

A roundtable representative gave a presentation to the Minister's Practices Advisory Committee. It was interesting to note that the Federation's key messages appear to have been heard and are generally consistent with the input from other organizations and groups.

Forestry Regulatory Review

The Ministry of Forests and Range's Forestry Regulatory Review received over 540 submissions covering 26 topic areas. The FBCWA made 17 submissions, which were listed and summarized in a previous edition of the *Almanac* and can be obtained from the Federation's website. The submissions were sorted into four categories:

1. No legislative change or further consultation
2. Requires regulation change
3. Related to First Nations and require consultation
4. Longer-term and requires legislative changes

So far, only items in the first category have been addressed, which included the MFR shifting back to one blanket

salvage permit covering a woodlot licence area. Integral to pushing this action item forward was a Forest Practices Board complaint submitted by Rod Krimmer.

For more information on Rod's complaint, please see his opinion article ("My two cents' worth") on page 12 of this edition of the *Almanac*.

For a copy of the MFR bulletin dealing with blanket salvage permits, please go to www.for.gov.bc.ca/mof/InterpretiveBulletins/. The rest of the Federation's submissions fall into categories 2, 3 and 4!

Safety program

The directors reviewed the safety package developed by Kevin Nichol (under contract to the Federation) at the Kamloops annual meeting and approved its distribution to woodlot licensees. The package had previously been reviewed by the BC Forest Safety Council, who also referred it to WorkSafeBC.

It is primarily targeted at licensees who are independent owner-operators, and is intended to help them become WorkSafeBC-compliant and set the stage for the next step to safe certification. Look for a notice in the *Almanac* or on the FBCWA website about how to acquire the program.

Expansion of woodlot program

The announced expansion of the woodlot licence program is underway. As of the beginning of October, three new woodlots had been advertised: one

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New interim tabular rates policy

By Dean Daly

As you are probably aware, the Minister of Forests and Range announced that the interior timber pricing policy for woodlots will change on December 1st, 2008. This interim tabular rates policy will be in effect until the Ministry of Forests and Range (MFR) and the Federation of BC Woodlot Associations (FBCWA) complete work on an “Annual Rent” model that is intended to be the long-term policy for woodlot timber pricing.

The Minister’s announcement was a welcome recognition of the major structural problems that have been faced by woodlots for many years under the interior timber pricing policy.

The interim tabular rate policy for woodlots will be calculated as 15% of the average sawlog stumpage rates for major licensees and BC Timber Sales timber.

Woodlot rates will be summarized in Table 6.1 (a) of the Interior Appraisal Manual by species and forest zone. The calculation methodology and percentage factor are now the same for community forest agreements and woodlots, which helps to level the playing field between the two log-selling tenures.

Since the Minister’s announcement, the MFR and FBCWA have been working on a list of policy transition provisions to enable implementation of tabular rates, as well as to maintain Market Pricing (MPS) cutting authori-



Dean Daly, Interior
Timber Pricing
Coordinator

ties where required.

The transition’s provisions are intended to give licensees and government direction on how to deal with cutting permit appraisal and administration issues related to the interim policy change. Although a number of transition provisions had not yet been finalized at the time of writing, the following issues are likely to be implemented as of December 1, 2008:

- All “normal” MPS cutting authorities (i.e., normal letter permits such as A, B, C) that were approved before the policy transition date (anticipated to be December 1, 2008) will remain under full MPS policy of the day until they are completed, expire or are surrendered. This means that all MPS policy and cutting permit administration rules will apply to these cutting permits (i.e., surrender policy, options to elect fixed or variable rates, amendment and reappraisal provisions, take-or-pay penalties, etc.);
- For cutting permits issued before December 1, 2008, where no harvest has occurred, the licensee will continue to have the option to surrender that cutting permit without penalty and reapply under the tabular rate;
- All blanket salvage cutting permits will be reappraised to the interim policy tabular rates (Table 6.1 (a)) as of December 1, 2008;
- Any licensee who has an Extended Road Amortization Agreement (ERAA) existing as of November 30, 2008, will be permitted to continue to apply for MPS cutting authorities (normal letter cutting permits) in accordance with their ERAA, until the ERAA amount is depleted to zero dollars. It is understood that this may require several MPS permits for any licensee;
- All woodlot cutting authority applications submitted by licensees on or after December 1, 2008, which are not associated with ERAAs will be appraised in accordance with the interim tabular rate policy (Table 6.1 (a)).
- The interim tabular rate policy will apply to all woodlots, regardless of their Allowable Annual Cut. Tabular rate cutting permit (CP) submissions will be reduced to a Forest Tenure Administration (FTA) submission (gross and net area by block for the licence), with no requirement for Electronic Appraisal System (ECAS) submission;
- Road permits are likely to continue being reappraised (unresolved at the time of writing) on June 1 each year, in accordance with the current policy (average of sawlog stumpage rates for harvested volume on your woodlot in the previous year, or district woodlot average where there was no harvest in the previous year from your woodlot);
- Table 6.1 (a) will be updated once annually on August 1 (the same

(Continued on page 12)

“... buyers have to live up to *our* standards.”

dreamed.

As you drive farther and higher up the mountain, shafts of sunlight pierce the thick tree canopy, and warning signs appear on the trunks of hefty trees.

“Sheep and guardian dogs on road,” warn several of the signs. You are now in a forest -- more specifically, a woodlot license -- managed by the Bodman family. Dean Bodman’s sister Jennifer and her husband, Chris Cunningham, manage picturesque Jay Springs Ranch, the family’s sheep ranch that lies a few more kilometres up the road.

8 “Our parents Geoff and Shirley Bodman got us into all this,” Dean told me with a chuckle when I visited him and Jennifer on top of the mountain in September. “Our dad was awarded the woodlot license in 1985. They bought the homestead from another sheep rancher, so sheep ranching has gone on here for eighty years.” The Bodman family has been raising sheep here now for forty.

For the past five years, the ranch and woodlot have actively used silvopasture techniques to grow trees and grass. Silvopasture is an agroforestry practice that combines livestock grazing on forage crops or pastures within actively managed tree crops. On the Cunningham ranch, woodlot production and sheep raising are managed together.

“We are using the sheep as a vegetation management tool, especially on the areas that were devastated by the

pine beetle and had to be logged,” they noted. “There are many benefits of having the sheep and woodlot – the sheep supplement cash flow while the forestry industry is down because of the beetle damage, and the sheep benefit growing trees by dispersing nutrients in the wooded areas, and keep down competitive vegetation to give new trees a chance to grow. We rotate pasture so we have healthy grass, even in drought conditions. If there’s plenty of grass, we can graze more sheep and get more meat to market.”

Jennifer Cunningham and her family are the second generation to manage Bodman sheep, and the Cunninghams’ twelve-year-old daughter Maggie seems willing to be counted in the third. Fortunately, Jennifer’s husband Chris immediately immersed himself in the family enterprises, working with Dean in the woodlot at times, and is heavily involved in sheep ranching.

“My sister Jocelyn is still involved,” Jennifer Cunningham said, “but not in the day-to-day operation. My nephews are also interested in the future of the ranch. Malcolm, Jocelyn’s eldest, helps while we are away at markets and Zack, Dean’s eldest, helps his dad in the woodlot side of things. The other two cousins are too young to help out yet, but always know where the sheep are and what the dogs are up to.”

Dean Bodman attended Selkirk College to become a Registered Professional Forest Technician, and spends most of his time managing the wood-

lot, which is six hundred hectares of Crown land forest, along with the family’s 320 acres of private forest. Much of the terrain is extremely steep, and on those treacherous slopes, Bodman does most of his own tree harvesting.

The sheep range free through the forest, which keeps down some of the understory beneath the trees, and are guarded by a vigilant team of several dogs, both Great Pyrenees and Maremmas, who travel with the flock.

The woodlot is presently in its fifth five-year cut rotation. The six hundred hectares of Crown land in the woodlot licence are also part of the ranch’s grazing lease.

For a while, both Dean Bodman and sister Jennifer were employed by the family’s Registered Professional Forester, or RPF. The two educated themselves on forestry regulations, practices and woodlot operations, and slowly took over the management of Woodlot 311. Later, through his own company, Jay Springs Forestry Consulting, Dean took over operation of the woodlot as well as logging for the ranch partnership on a contract basis.

In 2003 the families formed Pemberton Ridge Timber Inc. The woodlot license was transferred from Geoff and Shirley to Pemberton Ridge, with Dean in charge of operation and management of the family’s timberland.

Now, Woodlot 311 boasts Green Tag Forestry certification, a third-party certification that was developed in the

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USA by the National Forestry Association. A Green Tag Forest is woodland whose stewardship has been certified as incorporating good forestry practices that assure a balance of natural diversity and sustainable forest productivity.

“In March 2004 our woodlot was audited to test the new Pan Canadian Woodlot Standard certification developed by the Canadian Federation of Woodlot Owners,” the family states on their website. “Woodlot 311 was found to be in conformity with the requirements of this standard.”

More review is in progress, and it appears that Woodlot 311 will receive endorsements in recognition of its sensitive management practices.

Sheep raising activities at Jay Springs Ranch have reached a new level, as Chris and Jennifer Cunningham work to get their products known and appreciated – especially in the big-city markets of Vancouver. The sheep operation is now called Jay Springs Lamb Company.

Jay Springs Lamb Company’s positive marketing strategies and regular journeys to Vancouver over the past six years have paid off. They’ve found that urban gourmet chefs and foodies like to know the people who raised the lamb they buy, and appreciate the fact that the animals are humanely raised, free-range creatures. At the farmers’ markets, the Cunninghams are available in person for direct sales of their products.

Jay Springs lamb is packaged as individual cuts at a Canadian Food Inspection Agency processing facility, and sold frozen. The lamb is available as large freezer orders, custom cut and wrapped, and also in individual cuts and freezer packages, available at the markets, for delivery or for pickup



PHOTO: DEBORAH GREAVES

The Cunningham's daughter is an active contributor to her family's success.

right at the ranch.

Photos of the contented free-roaming sheep, Jay Springs Ranch itself, and the full selection of cuts for sale can be seen on the ranch’s attractive website, and e-mail orders are accepted.

The Cunninghams have thought of just about everything to make their product available and appreciated.

Not only has the lamb from Jay Springs Ranch gained a regional reputation, but lately, the Cunninghams say, “buyers have to live up to *our* standards.”

Along with the marketing of the meat, Jay Springs is also imaginatively promoting wool. The one to two thousand pounds of wool they gather each year can be turned into felt to make humble dog toys, or converted to yarn suitable for knitting, dyed in an array of colours.

At age twelve, the Cunninghams’ daughter Maggie is an expert sales person and cashier, gaining a rich variety of experiences through life on a mountaintop ranch, and regular treks with a freezer truck to “the big city.”

Jay Springs Lamb and Pemberton Ridge Timber have left no stone unturned in their team quests to make a living on the land. They’ve joined forces with other ranchers who provide quality naturally-raised lamb and beef, and on their website even promote the surrounding valley’s tourism amenities.

This is a family with a thoroughly modern outlook, living in a timelessly beautiful pastoral setting. Theirs is a lifestyle that’s always challenging and filled with hard work.

However, as people in BC continue to get more interested in locally and ethically-raised food, Jay Springs Ranch appears to be headed into a bright and very profitable future. ♦

Please note:

The opinions expressed in the Almanac do not necessarily reflect those of the Federation, the Council, or their members.

Woodlots moving to community forest model

By John Marlow

As most licensees are aware, the Forest Minister announced at the AGM in Kamloops that the woodlot licence program will be moving to the community forest model for timber pricing as of December 1, 2008. By the time you read this article, this may be a reality.

Throughout the summer and into September, on the Minister's suggestion, we worked on a totally new timber pricing model where licensees would rent the land instead of paying stumpage on a per m³ basis.

The theory was (and is) that by renting the land, licensees may find ways to better use all sites, both productive tree-growing sites, as well as sites that may not be suited to growing trees.

The concept was also to encourage incremental silviculture that may increase the yield on a woodlot licence where any increase in harvestable volume would be a net benefit to the licensee, as rent would be paid per ha.

A land rent proposal was submitted and has apparently been reviewed by government. The announcement that we are moving to the community forest model was described by the Forest Minister as a bridge between the full MPS appraisals we do now, and a possible new land rent system in the future.

It is not clear how or when we will resume land rent discussions, but the intent is that in the New Year we will



John Marlow, Coastal Timber Pricing Coordinator

investigate this option further. We are diligently working on the transition policy to the community forest model. The stumpage rates are direct from the table on page 7-3 of the Coast Appraisal Manual (CAM), and will be updated annually on March 1.

Once this system is in place, the stumpage rates will simply be the rate indicated in the appropriate table. Cruising and ECAS submissions will no longer be required. There will still be a requirement for a CP application (cover letter) and digital map submission (FTA submission).

At present, there will still be a maximum four-year term on cutting permits, and waste and residue procedures will remain in place.

The intent is to ultimately move to a system where licensees have only one cutting permit for their woodlot licence, and blocks are simply amended into and deleted out of that CP.

The main transition issues in regards to this tabular system are as follows:

Extended Road Amortization Agreements (ERAAs)

Many licensees on the Coast have ERAAs (estimated to be in excess of \$4 million) and these "cannot be changed unless by mutual agreement" (from the CAM). The Federation has proposed two options :

- Preferred option: Write costs off against the table rate. This option provides for a clean transition to table rates where, as of December 1,

all licensees would be on table rates.

- Second option: Licensees with ERAAs will continue to appraise timber under the Market Pricing System (MPS) until their ERAA costs are \$0.00.

Status of existing road permit rates

Early in 2009, we expect to begin dialog with government to fine-tune this tabular system to make it fair to all licensees. At present, Interior community forest licensees pay 15% of the major licensee rates, whereas Coast community forest licensees pay 30% of major licensee rates.

This obvious discrepancy between the two systems will be a key focus of discussions in January / February with the intent of the woodlot program (and the community forest program) provincially moving to the 15% factor value.

We have initiated discussions with coastal community forest licensees, some of whom are not operational, or have having severe difficulties operating at the 30% table rate.

We hope to work with community forest licensees to resolve this issue in a way that benefits all, and helps enable licensees to start harvesting operations.

The Federation continues to have a seat at the following two stumpage committees:

Coast Timber Pricing Advisory Committee (CTPAC)

One CTPAC meeting was held immediately following the Federation

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Update on electronic forest management

By Coleen MacLean-Marlow and Tom Bradley

We're in a bit of a valley in the e-FM world . . . between planning and implementation.

The joint Federation-MoFR e-FM Project wrapped up in July following the presentation of our findings to the Joint Working Group. The e-FM team researched and mapped, in great detail, the business requirements and rules (not always the same) of each electronic submissions system that currently affects woodlots.

This process resulted in 15 business process maps (BPMs) – colourful and thoroughly daunting visual aids that show the myriad of things licensees are supposed to do. Printing the BPMs at a readable scale requires a map plotter.

One thing we found out right away is that the MFR business areas were unaware of the sheer volume of e-submissions required, or how many times woodlots had been swept up in submission requirements originally envisioned for major licensees. This was a positive outcome, in that we saw broad consensus that “it was not intended to work like this.”

Whether we can capitalize on that consensus to implement positive changes remains to be seen. The team also compiled 127 recommendations for improvement with regard to ESF systems, data requirements, tool sets, and training. Those recommendations have since been boiled down to 70 . . . so as not frighten anyone off.

The BPMs and all of the recommendations are contained in the project's technical report, which was finalized



PHOTO: BRIAN MCNAUGHTON

George Delisle gets some tips on the RESULTS training package during one of the popular one-on-one e-FM sessions at the AGM.

in October 2008. The *General Report for the EFM Strategic Plan*, which describes the project methods and contains key findings, was just finalized in November. We feel that really useful work has been done in a co-operative environment to produce the recommendations and a way forward.

However, we still need implementation to deliver something of value to licensees, and to the MFR staff, who also suffer e-Frustration. Both e-FM reports will be reviewed by the MFR operational leadership team, who will determine resource allocation for implementation.

The new and improved version of the RESULTS Training package was tested at our AGM this fall. The much, much shorter basic training (three to four hours -- we took out all the rhetoric) was well received. We also offered one-on-one sessions where individuals could get help with their issues and enter their own data and spatial infor-

mation. These were very popular.

There was a suggestion that we incorporate the one-on-one at every AGM, as an annual education and troubleshooting session. The AGM model will form the basis of further RESULTS training – a short classroom session followed by optional individual sessions. There will be at least another eight training sessions held between January and February 2009, at locations yet to be decided.

The RESULTS cleanup is chugging along. The MFR is committed to the process. The underlying difficulty is that we can only fix what we know about. The MFR spreadsheets catch only certain things. If your silvicultural data or spatial information is still incomplete or incorrect, please let Coleen Maclean-Marlow know, and she will make sure your issue is assigned to the correct consultant. If you have difficulties with a consultant, please contact Coleen. ♦

My two cents' worth: What can you do?

By Rod Krimmer

As woodlot licensees, we are used to working under regulations that may seem inappropriate or unnecessary at best. Most of the time we feel completely impotent to effect a positive change and so we dutifully jump through the hoops.

Occasionally, however, we run up against a policy that seems to contradict the very essence of what woodlot licences were designed to do best. Such was the case in December 2006, when blanket salvage permits (BSPs) were no longer allowed over the entire license area. The new policy made it vastly more complicated to go about the simple task of cleaning up pockets of scattered fir and spruce bark beetle to prevent the spread of infestation.

But what to do?

The BSP has been fundamental to my operation in recent times. I checked my options and decided to file a Forest Practices Board (FPB) complaint on the grounds that this regulation negatively



Rod Krimmer,
Almanac columnist

affected the ability of all licensees to implement good forest practices on the ground. At first the process of filing a complaint intimidated me, but it turned out to be quite simple. First, I placed a phone call to see if I had adequate grounds.

Second, I wrote a one-page Notice of Complaint.

Third, I had an interview and visit from an objective complaint analyst.

And last, I waited for the report.

Through the whole process, which lasted a little over a year, I wondered whether it was worthwhile. I was assured that the very act of making the complaint, no matter what the FPB ruling, puts pressure on the parties to resolve a situation.

And sure enough, the one woodlot license provision coming out of the Forest Regulatory Review was a return to blanket salvage permits over the whole licence area.

Now, I am not saying that my com-

plaint was entirely responsible for that, but I'm sure it didn't hurt. The subsequent FPB report supported my premise and recommended permanent amendments to the salvage permit policies for woodlot licenses in BC. It can be viewed online at www.fpb.gov.bc.ca, along with other information about the FPB.

The simple lesson here is that we are not always helpless in the face of indifference and inaction. The Forest Practices Board (1-800-994-5899) is a powerful tool available to us all. As stewardship advocates, we should use it whenever forest practices are negatively impacted on our licences.

At least, that's my opinion.

— Rod Krimmer, W0550, Big Lake Ranch, BC ♦



PHOTO: WIKIMEDIA COMMONS

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► From page 7

Interior timber pricing: New policy may lead to more streamlining

update timing for both woodlot licensees and Community Forest Agreement holders);

The FBCWA and the MFR believe that the change to an interim tabular rate policy will begin to produce the much-needed administrative streamlining for both licensees and government (i.e., should dramatically reduce appraisal submission and review costs for new tabular rate cutting permit submissions).

The interim policy change enables government to now implement many of the other key recommendations of the WARRT committee to further realize administrative efficiencies for government and licensees (i.e., one cutting permit for a woodlot, simplified cutting permit amendment processes, elimination of take-or-pay on tabular rate cutting authorities, etc.).

This is a step in the right direction en

route to a long-term interior timber pricing policy for woodlots. The Minister's leadership is much appreciated.

For more information, contact Dean Daly, Interior Appraisal Representative, c/o Lynx Forest Management, 6180 Raceway Rd., Smithers, BC, V0J 2N1

Ph: 250-847-3259 / Fax: 250-847-1884 / e-mail: deanrdaly@gmail.com ♦

Name our coffee table book!

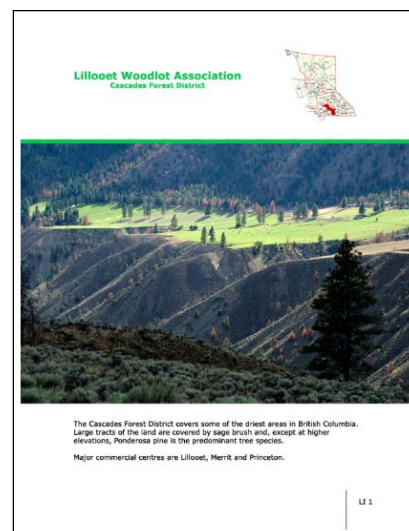
The coffee table book being produced by the FBCWA (see article at right) needs an alluring title.

Those who suggest a name for the coffee table book will be entered in a draw to win an FBCWA hat and T-shirt.

Send your ideas, along with your name and phone number, to Cathy McClary by phone (1-888-925-9995), fax (250-962-9199), or e-mail (cjmccclary@shaw.ca). ♦

Reserve your copy of new coffee table book

The FBCWA has commissioned Wim Tewinkel to create a coffee table book that showcases and celebrates BC's woodlots and woodlot licensees and their families. Through beautiful photos and a few well-chosen words, the book attempts to capture the seasonal beauty of Coast and Interior woodlots as well as the spirit and culture of the woodlotters and their families who so diligently manage the licences. The book is expected to be released in 2009. Order now online at www.woodlot.bc.ca, or by contacting Cathy McClary at 1-888-925-



The new book celebrates BC woodlots

Adaptive management and tenure rights

by Fred Newhouse

The ability to adapt to change is a key feature in evolution, and, given current climate warming scenarios, it will be a key feature for future forests. In the case of an entire forest, the way we manage can have consequences currently unfathomable to us.

If we have tenures capable of providing more adaptive opportunities, this may be of value, especially in the interface zone between the extensive forest and the urban and rural settlements in BC. The woodlot licence is one of those tenures, and as such, should be given a further look as a direction we need to go in for our public forestlands.

For those unfamiliar with the woodlot license, a good starter is the home page of the BC Federation of Woodlot Associations, www.woodlot.bc.ca.

There are roughly 800 woodlots throughout BC, located mainly in the interface zone between the urban and rural areas of BC and the vast unpopulated public forest that stretches between our travel

routes. One of the few highways through this forest is the Coquihalla.

The landscape seen from this highway is a dense mature pine forest and numerous pine plantations, most less than 20 years old. The north's mountain pine beetle epidemic has just reached this forest, and over the next few years there will be a dramatic change in roadside view.

What makes the interface zone different from this vast forest is its accessibility and closeness to our homes. With an increasingly urban population, the forests within half an hour of home are the places we are most familiar with. Due to the price of gas and the higher value we put on our leisure time, trips to the forest are either the short ones close by or the longer planned trips to a specific location.

This interface zone that we experience is more valuable when it has a high level of standing trees and is safe from wildfire. The zone is most often our source of firewood, water, recreation, and food and materials collected from non-timber resources. For these reasons, this zone is

highly regulated.

The management of this zone has gone through a few changes over the years. We can start by going back 200 years, to a time before the European fur trading economy forever changed the existing culture. The natural disturbance pattern of fire had a 20- to 200-year return time on the plateaus, but on the valley corridors, we have records that show the fire interval was down to 12 years. In the book *1491*, author Charles C. Mann notes that while "wildfires reset the ecological clock," human-lit fires were a cultural disturbance pattern most evident along travel routes and near villages.

With the removal of this cultural disturbance pattern, the landscape shifted to one dominated by less frequent natural fires that consequently allowed fuels to grow and build up. This period of non-cultural disturbance became a problem when settlement occurred in the mid-19th-century. The result of the catastrophic fires of the late part of the century — 90- to 120-year-

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AGM memories





FBCWA Business Resolutions

Note: The resolutions below were presented to the general membership and voted on by delegates at the AGM on October 4, 2008. The FBCWA Directors considered, reviewed and voted on the resolutions at their meeting on October 5, 2008. The outcome of both sessions appears below each resolution.

1. Whereas:

- Under FRPA and the Chief Forester's Standards for Seed Use (CFSSU), licensees are only permitted to exceed seed transfer standards for up to 5% of the total trees planted annually within a measurement unit. The CFSSU definition of a management unit ranges from all licenses held by a major licensee within a Timber Supply Area, to an individual woodlot licence; and
- Given the scale of a typical woodlot's annual planting program, this "one size fits all" regulation effectively imposes zero tolerance on the woodlot licensee's ability to manage seed use; and
- The MFR has announced their intention to amend the CFSSU this fall;

Be it resolved that the Executive gives consideration to:

- Working with the MFR to develop a seed use policy that recognizes the scale of woodlot operations and provides woodlot licensees reasonable operational flexibility in seed use.

Moved: Terry Hammond
Seconded: Lisa Marak
Membership: Carried
Directors: Carried

2. Whereas:

- The woodlot licensees of the province have dutifully paid their WPDC levy to build the current fund and many of them are currently (and in the future) being threatened to be converted to treaty lands; and
- Most woodlot licensees are not experienced in the negotiations of replacement and compensation;

Be it resolved that the Executive gives consideration to:

- Establishing a legal support program by retaining the services of experienced lawyers and compensation specialists. The program will provide services of up to a maximum of \$10,000/year to affected woodlot licences in order to support fair and consistent settlements.

Caveat written by Directors:

- Developing in a timely fashion, a licensee support program including legal references to define parameters around tenure rights and compensation

Moved: Wolfram Wollenheit
Seconded: David McBride
Membership: Carried
Directors: As written: Defeated;
With caveat: Carried

3. Whereas:

- Woodlot licensees have been classified as Integrated Forest Management under WorkSafeBC; and
- The classification is based on revenue streams, not on risk;

Be it resolved that the Executive gives consideration to:

- Taking the WorkSafeBC classification problem to a higher level; i.e., the Minister of Labour and/or WCB Chairman of the Board with the intent of proper classification of woodlots relative to their individual risk.

Moved: Kathy Mayes
Seconded: Lisa Marak
Membership: Carried
Directors: Carried

4. Whereas:

- Some woodlot licensees have been severely affected by the pine beetle to the point that they do not have any merchantable wood available for harvest; and
- The woodlot licensee is in good standing; and
- The option of removing Schedule A land may allow them to pursue a better use of the land;

Be it resolved that the Executive gives consideration to:

- Requesting the MFR to consider the option of amending the Management Plan and Woodlot Licence Document to include wording to the effect that if removal of Schedule A land occurs, no ownership transfer of the woodlot licence will be approved except to licensee's estate, unless lands are replaced.

Moved: Anne Davidson
Seconded: Marvin Strimbold
Membership: Carried
Directors: Defeated

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MOFR approves new WL licences; managers enthused

by Deborah Greaves

Licensed woodlot managers from all over British Columbia who gathered last weekend to discuss their futures during tumultuous times in the forest industry reacted positively to the news that the provincial government has decided to allow more woodlots.

On October 4th, one hundred people associated with the province's 828 active woodlot licenses gathered at an Annual General Meeting at the South Thompson Inn in Kamloops to hear Minister of Forests Pat Bell's announcement. Bell described how the forest industry will need to look at ways to more intensively manage the forest resource and how woodlots are perfectly suited to this. He also showed his support of the woodlot licence program by announcing the release of new woodlot licenses and addressed some of their concerns on the administration of a licence.

Members of the Federation of BC Woodlot Associations expressed reserved optimism at the announcement that up to seventy-five new woodlot licenses will be granted over the next few years, to bring the total of licensed woodlots to 900 by the year 2011.

"We're pleased to hear about new woodlots and adjustments to the paperwork," said Harold and Shirley Turner of Kamloops after the announcement, "but our costs are three times what they used to be, and we need a good market for the wood."

Despite the fact that Minister Bell stated woodlot licensees in 2005 generated an estimated \$183 million in economic activity in BC and harvested just over three million cubic metres of timber, woodlot licensees have been referred to as "the forgotten foresters."

Woodlot licensees, licensed to manage forested Crown lands, are often farmers, ranchers and registered professional foresters who own their own property near their woodlots and have deep roots in the community.

Unlike larger, high-profile timber



PHOTO: BRIAN MCNAUGHTON

(L-R) At the AGM: Pat Bell, Minister of Forests and Range; Derek Strimbold, woodlot licensee; and Dave Zirnheld, woodlot licensee, Council director, and former Minister of Forests.

companies, licensees are usually families, individuals and First Nations groups who operate their woodlots as small businesses. Many licensed woodlots, which combine private land with up to 800 hectares of Crown land on the Coast and 1,200 hectares of Crown land in the Interior, are located in interface areas close to cities and towns.

Woodlots are often located near communities or over areas with sensitive resource management issues. As well as providing some income to those who manage them, woodlots help maintain a connection to the forest for local and visiting natural resources students and enthusiasts. Mature trees are cut and new trees planted at mandated intervals, enabling many woodlots to provide recreational opportunities in all seasons for local hunters, hikers, horse riders and naturalists.

Many licensed woodlots are logged selectively for decades. Larger cutblocks are generally found on woodlots only in the event of tree disease, blow-down from intense storms, or beetle infestation.

Each woodlot generates jobs in planning, harvesting, road construction and maintenance, reforestation, silviculture

and small-scale timber processing.

These jobs are usually filled by members of the family holding the license or other skilled local workers, resulting in enhanced economic activity in nearby communities providing goods, services and equipment needed by woodlot managers.

Family foresters tend to manage for the future, often handing down their woodlots to their children with the hope that several more generations may find ways to profit from and care for the forest.

"When it comes to knowing how to add value to forests, no one is better prepared than woodlot people," Minister Bell said on Saturday.

To celebrate excellence in the management of woodlots, Minister Bell also announced a new annual competition that will recognize woodlots that exhibit the most fully utilized landbase and best effective management with a \$10,000 cash award.

More information is available on the Federation of BC Woodlots website, www.woodlot.bc.ca ♦

Reducing interface wildfire risk: FireSmart management practices



tation management are the current national standard.

The FireSmart program manual *FireSmart – Protecting Your Community from Wildfire* (Partners in Protection – July 2003) is a useful reference (www.partnersinprotection.ab.ca).

The goal of interface fire protection fuel treatment is to reduce the chance of structural ignition from direct wildfire impingement or heavy firebrand accumulation and resulting spot fire ignitions.

The general fuel management strategy for provision of wildfire protection to wildland/urban interface communities involves using existing fuel breaks (areas featuring deciduous or low flammability fuels, green space or access/utility infrastructure corridors) or stand-level fuel treatments involving fuel removal, fuel reduction, or fuel conversion in strategic locations.

Fuel treatment recommendations are based on FireSmart fuel management guidelines and incorporate the following general principles:

- Removal of selected whole trees to leave a forest of more separated and fire resistive trees,
- Pruning of trees to increase the height to live crown to a minimum of 2 meters,
- Removal of surface fuels or slash created by spacing and pruning.

Fuel treatment recommendations provide for shaded and open fuel breaks by varying whole tree spacing criteria.

Both fuel treatment standards (specifying tree, surface fuel removal and burn pile criteria) and fuel treatment actions (methods – handfall, mechanical, chip and spread, and firewood salvage with environmental and operational guidelines) are specified.

FireSmart fuel management guidelines are flexible and can be varied to optimize or improve ecological conditions, wildlife habitat, and aesthetic qualities in the interface.

Other factors such as forest health, windfirmness, slope stability, riparian zone management and maintenance of fuel modified areas can also be addressed in the fuel management prescription. ♦



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By Don Mortimer

Editor's note: The following is an abstract of the presentation Don made at this year's AGM.

Fuel management is an important component of any strategy to reduce wildfire danger adjacent to interface values at risk. While there are no strategies providing failsafe wildfire protection to structural values located in forested areas, the FireSmart recommended guidelines pertaining to vege-

About Don Mortimer

Don Mortimer (Fireline Consulting, Rossland BC) is a wildland firefighter with over 30 years of operational fire suppression and management experience in most areas of Canada.

Don was one of the principal contributors working with the Partners in Protection group in the development of the manual "FireSmart – Protecting Your Community from Wildfire."

Don's fire protection consulting work includes the development of

wildfire protection plans for a variety of municipal / regional district and private clients. Don has also worked with a variety of agencies in developing operational training and policy / procedure for both wildland fire suppression and the structure protection operations used on large wildland urban interface incidents.

Don is currently working on a project with BC's Office of the Fire Commissioner, where his operational work

as a structural protection specialist on interface incidents has led to a consulting role in assisting with the development of a provincial structural protection program. ♦



Message from keynote speaker

Larry Mason sent the following message: "Congratulations on a great conference and thank you for your hospitality. I really enjoyed meeting with BC woodlot owners. Also enjoyed hearing the Minister speak. I learned a lot about the woodlot program, which I find to be an impressive approach to stewardship."

A copy of Larry's speech is on our website, www.woodlot.bc.ca, in the AGM section. ♦

Silent Auction raises \$1800

\$1800 was raised by those supporting the Silent Auction at the AGM.

Thank you to Bea and Craig Mann for obtaining prizes and items from local businesses.

Proceeds go to the FBCWA scholarship fund (see information and application form on page 22 and 23 of this issue of the *Almanac*). ♦

Purpose of the Woodlot Product Development Council

The primary purpose of the WPDC is to ensure that levy fees are spent on woodlot licensee priorities to benefit and promote the woodlot industry throughout BC.

Funds are collected through powers granted to Council under the *Farming and Fishing Industries Development Act*. ♦

Thank you to AGM organizers

by Cathy McClary

For the past twenty years, local woodlot associations have hosted the Annual General Meeting. This year, for the first time, the Federation of BC Woodlot Associations and the Woodlot Product Development Council took on the organizing of the event.

The FBCWA/WPDC chose the central location of Kamloops and asked me to be the AGM coordinator.

In early April, I met with the Kamloops and District Woodlot Association to inform them that we would be delivering the AGM in Kamloops.

I went to the meeting with a wish list of ways that they as locals could help me to put on a successful meeting. I returned home from that meeting with a taste of local flavours, ideas for speakers and most importantly, people offering to help.

From that, and with additional requests through the FBCWA, a volunteer host AGM planning committee was formed.

Over the next six months, I really appreciated the opportunity to have committee members available to toss ideas around with, to review suggestions or to offer new ideas.

As the AGM drew closer, others who were not on the organizing committee offered to help.

I am grateful for all the support and assistance offered by the FBCWA, the WPDC, the MFR, the organizing Committee and individual licensees who helped out with the 2008 AGM.

The exact location of the 2009 AGM is yet to be determined. If you are interested in helping to organize the event, I'd like to hear from you! ♦

2008 AGM Organizing Committee

Mark Clark, Prince George
George Delisle, Westbridge
Bryon Every, Chase
Norm Fennell, Kamloops

Bea Mann, Barriere
Craig Mann, Barriere
Warren MacLennan, Clearwater
Fred Newhouse, Lumby



PHOTO: BRIAN MCNAUGHTON

Elwood and Jake (a.k.a. Brent Petrick and Tom Bradley) plan their next gig. It was indeed a rare moment caught on film when Brent actually removed his hat!

WPDC investment fund

by Steven Wright, WPDC Treasurer

The AGM was a great success and was enjoyed by many who attended. At the WPDC portion of the AGM on October 3, questions were asked about the investment fund.

The main query was questioning its rate of return and where the money is invested. All figures presented at the AGM were based on our year-end of March 31, 2008.

The investment fund is mostly a result of increased revenue due to higher AAC, caused by the MPB epidemic. The extra income is already dropping and WPDC will face decreased revenue due to lower AACs for the next 70 years or so. The investment fund is managed by the Vancouver branch of Phillips, Hager & North.

The decision to go with that firm was based on a review by the previous Council executive of a few select investment companies. Phillips, Hager & North (PHN) was purchased by the Royal Bank earlier this year, but daily management is still handled by PHN.

The financial sector has faced some turmoil over the last year and fluctuating markets are expected to continue.

The fund is in relatively safe in-

vestments, but can still face fluctuations and losses.

However, we do not expect the 30% decrease in value that equity-based funds are realizing. The fund

**...fluctuating markets
are expected to
continue.**



does have about 20% of its value in equity-based assets, so some value reduction is anticipated.

Last year the fund made about 1.4%, or about \$28,000. The performance of the fund is not great; we had hoped for better returns. The fund is being managed within the parameters.

Council was looking into changing the parameters of investments at the beginning of 2007.

Since it is the licensees' money, it

was decided that we needed input from them. A question was asked in the fall 2007 questionnaire on strategies for investment. The majority of respondents (about 60%) did not want a more aggressive investment strategy.

Consequently, the investment followed the plan in place. The current strategic targets for PHN to manage the fund on our behalf are cash 5%, fixed income 75%, Canadian equity 15%, US equity 5%.

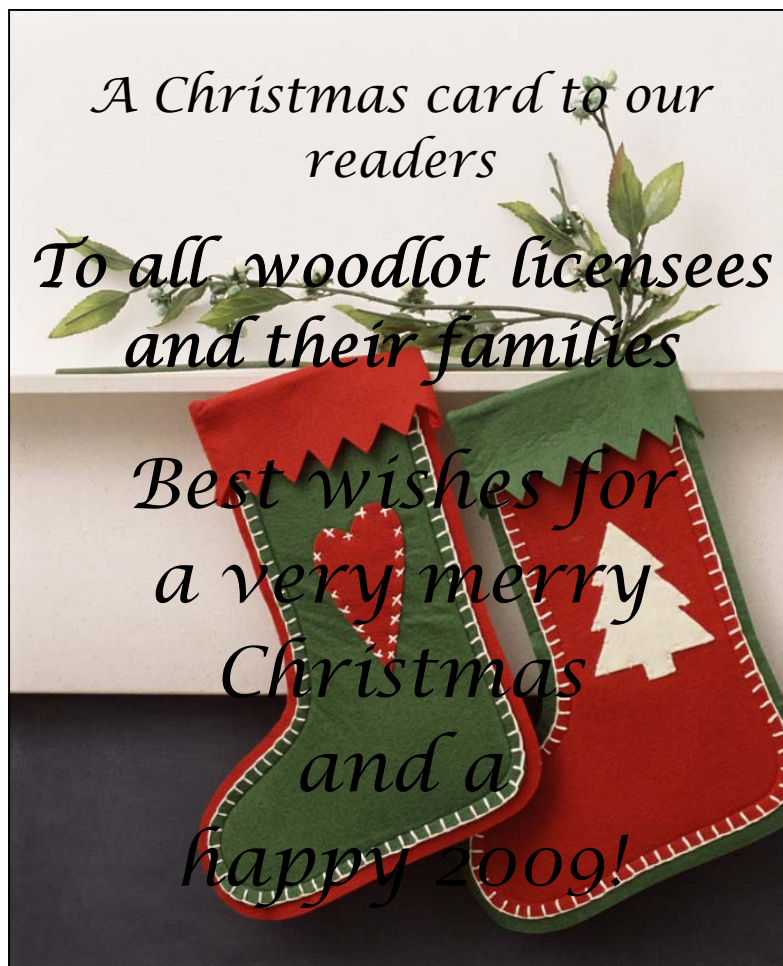
PHN can vary from this target, but they try to move back to this asset mix as units are bought or sold.

The accompanying table shows a comparison of account holdings as of March 31, and September 30, 2008. Comments to Council are welcome. A question on investment strategies will be asked again this fall in the annual questionnaire. The answers from the questionnaire will drive our strategies.

The annual budget is at or exceeding our income, as harvest levels decrease. This fund will be used to augment the revenue shortfall. Depending on the fund's rate of return, the levy income and the annual budget, the fund could be depleted in 20 years, or last in perpetuity. ♦

Woodlot Product Development Council Investment Account For March 31, 2008 and September 30, 2008

Fund	Market value to Mar 31/08	Percentage of total portfolio	Market value to Sep 30/08	Percentage of total portfolio
Cdn Money Market	271,376.46	14.0	271,415.28	14.4
Short Term Bond & Mtge	568,091.49	29.2	554,705.25	29.5
Total Return Bond	738,095.39	38.0	702,222.01	37.3
Canadian Income Fund	21,217.03	1.1	18,167.96	1.0
Dividend Income	40,840.07	2.1	38,005.50	2.0
Canadian Equity	180,573.75	9.3	184,591.07	9.8
Overseas Equity	38,569.74	2.0	28,621.80	1.5
C-Hedged Overseas Equity	12,316.02	0.6	9,961.86	0.5
US Equity fund	61,141.78	3.1	57,718.56	3.1
C-Hedged US Equity	12,301.17	0.6	16,140.89	0.9
Total	1,944,522.90	100.0	1,881,279.97	100.0



Province creates more forestry opportunities

KAMLOOPS – The Province will expand the number of woodlots, creating more opportunities for individuals, small business, and First Nations to benefit from forestry for decades to come, Forests and Range Minister Pat Bell announced this afternoon, in advance of speaking at the Federation of BC Woodlot Associations Annual General Meeting tonight.

“Woodlot operators have a long-term relationship with the forest they manage, which can often lead to innovations in silviculture and help us maximize the growth potential of our forests,” said Bell. “If we want to become world leaders in growing trees, we can learn from successful woodlot operations, and at next year’s annual general meeting, an inaugural Forests Minister’s Award for Excellence in Woodlot Management will be presented.”

The Province will offer 60 to 75

new woodlots over the next three years, which will result in a total of about 900 woodlots operating in British Columbia by 2011. The new licences are being offered throughout the province and all woodlot opportunities will be advertised on BC Bid at www.bcbid.gov.bc.ca. Bids have been received on three advertised tenures, one north of Campbell River, one north of Fort St. James and the third, southwest of Dawson Creek.

“Expansion of the woodlot licence program is good news,” said Federation of B.C. Woodlot Associations’ General Manager Brian McNaughton. “It’s gratifying that the Province realizes how important it is to create opportunities for continued local investment in new, community-based, forestry businesses. Many of the Federation’s members plan on leaving their woodlot to their children and they manage it accordingly, using light-

touch forestry techniques to the benefit of their families and the forest’s future.”

Woodlot licences are small, area-based tenures that combine private land with up to 800 hectares of Crown land on the Coast and 1,200 hectares of Crown land in the Interior, and are managed by individuals, groups, First Nations or public institutions. They are replaceable tenures, awarded for 20 years.

There are currently 828 active woodlots that include about 546,000 hectares in British Columbia. In 2005, woodlot licensees generated an estimated \$183 million in economic activity in B.C. and harvested just over three million cubic metres of timber. Each woodlot generates jobs in planning, harvesting, road construction and maintenance, reforestation, silviculture and small-scale timber processing. ♦



Scholarship Award Information

Rules and Regulations

1. Applications for this award must be received prior to April 24, 2009. Late applications will not be considered.
2. Applicants must be a direct family member of a woodlot licensee or private land owner who is a member of the local Woodlot Association and/or the FBCWA.
3. Applicants must be planning to attend a post secondary institution within 24 months of the application deadline.
4. Preference will be given to students in grade 12 and recent high school graduates.
5. Preference will be given to students entering a forestry-related program. Students entering other areas of study are welcome to apply, knowing there is preference for forestry related study.
6. The award of \$1,000.00 will be payable, on receipt by the FBCWA of documentation confirming registration into the institution for post-secondary education. This generally occurs in mid-September.
7. Essays and photos from applicants, particularly the successful applicant, may be printed in the Almanac.
8. The decision of the Awards Committee is final.
9. The Award Committee of the Federation of BC Woodlot Associations will be empowered to:
 - (a) Grant this award at its discretion;
 - (b) Withhold this award in any year if there are no eligible applicants, or for any reason deemed good or advisable.

IMPORTANT

Incomplete or late applications will not be considered. Please complete the application form and attach:

1. A letter describing the reasons which you feel qualify you for this award. Your letter should also include a detailed description of your experience in forestry, particularly on woodlots. Your letter may include information about your various interests and extra curricular activities.
2. A one-page (approximately 500- 700-word) typed essay entitled “How do woodlots contribute to my local community?” This is an open-ended topic so you can decide how to approach it.
3. Two letters of reference from previous or current teachers or employers,
4. A copy of your **most recent** report card, and
5. A recent photo of yourself.

Return to: Federation of BC Woodlot Associations
Attention: Nancy Pezel, Treasurer
173 W. Hoylake Road,
Qualicum Beach, British Columbia
V9K 1K3

Or send it digitally to islandswest@shaw.ca with a subject heading of FBCWA Scholarship Application

Applications must be received by April 24, 2009



Scholarship Award Application

Name: _____

Address: _____

Telephone: _____

Educational Information:

Currently enrolled in: _____

Post-secondary school you plan to attend: _____

Program you will be registered in for 2009-2010: _____

Relationship to woodlot licensee or to private land owner for Woodlot #

(e.g., daughter of Joe Smith, Woodlot #2345) _____

The woodlot licensee/private landowner to whom you are a direct family member, has
been a member of which woodlot association and for how many years?

Please include information on volunteer work, extracurricular activities, membership in school and
community organizations, sports, interests, hobbies, etc., as well as employment information. (You
may use another sheet if you need more room or if it's more convenient.)

General Manager's report: Expansion of woodlot program

north of Campbell River, another north of Fort St. James, and one southwest of Dawson Creek.

The new award process seems to be working well. Over the next two to three years, 60 to 75 new woodlots in total (~150,000m³/year) will be awarded. A reminder to all: legislation was changed a couple of years ago and a person can now hold two woodlots.

Alliance with industry groups

The Federation has been working on building stronger relations with other forest-based organizations with which it has common business interests. We have been working more closely with the BC Community Forest Association (BCCFA), the Truck Loggers Association (TLA), the Central Interior Loggers Association (CILA), the Western Silviculture Contractors Association (WSCA) and the Independent Lumber Remanufacturers Association (IRLA). It seems we have several common themes, including the following:

- BC needs a new forest sector vision;
- Building a better business environment;
- Creating more community-based, independent, small forestry businesses which can operate and be profitable on their own merits;
- Building a more diverse forest sector;
- Leaving more dollars in the local forest sector.

The objective is to have a stronger voice to the government and public. Currently, we are getting to know each other, building trust, and figuring out

how best to proceed.

Joint Working Group

The MFR and FBCWA formed a Joint Working Group after last year's AGM in Port Alberni to address priority issues. The following is an update of issues currently being worked on.

Regulation to allow the surrender of a woodlot licence

A regulation has been drafted and submitted to the Minister for decision. It is not known whether the Minister will approve it or not, or request changes. If approved, licensees can expect the regulation to ensure the province has adequate security to ensure a licensee fulfills all obligations: e.g., burning, road maintenance/deactivation and free growing.

Withdrawal of private land

The Ministry of Forests and Range interprets S. 54.7 of the Forest Act to mean that private land can be removed from a woodlot licence only if there is going to be a disposition of that land; i.e., the licensee intends to divest themselves of their interest in the land if and when it is removed.

Consequently, they say either a change in the legislation or writing of a regulation is needed to address withdrawals without disposition.

To add to the issue, the recently released Auditor General's report on private land removal from a TFL on Vancouver Island generated considerable reaction. The working group has had to take this report into account when developing recommendations for

the Minister. Getting this issue resolved remains a high priority with the Federation and the Joint Working Group, but is going to take some time! It is not a simple issue.

E-FM Project

Revisions to the final report, including the 100+ recommendations aimed at fixing errors, making e-FM licensee-friendly, and addressing inefficiencies, are almost complete.

The project brought to light the many problems the current system creates for government (MFR) and licensees. The Ministry executive is expected to act on many of the recommendations.

It is worth noting that the training session at the AGM and access to Coleen Marlow to support licensees are two things that have already been done in response to this project. There is still much more to be done to make e-FM more functional and practical.

Cutting permit postponement regulation

An amendment to the aforementioned regulation is in effect. It expanded the reasons for allowing a CP issued on or after November 4, 2003 to be postponed if there is other timber in danger due to forest health factors that should be harvested, or where the harvest will likely have an adverse effect on reforestation or an unacceptable fire hazard.

This applies to entire CPs only, not individual cutblocks, and the postponement can be up to a maximum of two years.

(Continued on page 25)

Coastal timber pricing: “Totally new timber pricing model”

AGM in early October. At this meeting, the proposal for the woodlot program to move to the community forest model was discussed and all licensees are aware of the transition. Other topics discussed included the following:

- Appraisal risk ratings
- Special stumpage pricing for stained cypress and powder worm in Cw
- Timing of new CAM
- Discussion of data protocols for new MPS equations.

MPS Technical Subcommittee

Due to the announcement that the woodlot program is moving to the tabular system, I have not been attending the MPS technical subcommittee

meetings but receive all minutes and submissions. The intent of this committee is to analyze the most current timber sale bidder data to update the MPS equations to best reflect timber sale bidder behaviour.

This is primarily a mathematical exercise, but deals with important issues such as no-bid sales, as well as ensuring that timber sales are harvested as they were bid, to ensure bids accurately reflect the conditions of the sale.

Appraisal Forecasting

Disclaimer: As we are moving to a tabular system, appraisal forecasting becomes difficult. Tabular rates do not change until March 1, and information is currently not available to accurately

determine average licensee stumpage rates for the year.

Log prices on all species have dropped substantially over the past year and it would be expected that stumpage rates have also come down.

Other variables as per the MPS equations are more difficult to estimate (Vol / ha, HB%, slope, location, piece size, etc.).

If there are stumpage issues that require attention, I encourage licensees to contact their association president or myself.

I can be reached at

- jmarlow@oberon.ark.com
- 250-285-2544 (Rockview Resources Limited). ♦

(Continued from page 24)

Open Burning Smoke Control Regulation (OBSCR)

Earlier this year, the MOE released an intentions paper (www.env.gov.bc.ca/epdiv/ema_codes_of_practice/open_burning/obscr-paper.pdf) regarding revisions to the OBSCR. It generated more than 100 responses and the MOE is now reviewing and considering next steps to address issues and recommendations. As many as 94% of woodlot licenses could be in the high and moderate restriction zones.

This is something licensees and associations should pay close attention to, as it has significant operational and cost implications to woodlot holders.

AAC vs. Cut Control exemptions

There has been much confusion regarding the use of Forest Act section 8

(setting a new woodlot AAC via a management plan) and S.75.9 (granting a cut control exemption) to authorize increased harvest levels on woodlots hit by beetles or other catastrophic events.

The Joint Working Group (JWG) is drafting a guidance bulletin to ensure everyone clearly understands the implications of these two sections.

The recent announcement by Minister Bell regarding woodlots moving to ComFor stumpage rates changes the situation with respect to AACs, appraisals and the applicability of the LVCE, so the JWG is revisiting the work it has done to date. The JWG expects to have the guidance out before the end of the year.

Blanket Salvage Permits

As noted in a previous section, information about BSPs can be found at the

following website address:

www.for.gov.bc.ca/mof/InterpretiveBulletins/

Replacement woodlot offer

This is a friendly reminder to those licensees who receive a replacement licence offer. Act quickly and don't forget to respond. If your licence agreement expires, it cannot be replaced and will simply turn into a non-replaceable licence.

In other words, it will run its term (usually another 10 years) then revert to the Province!

And last but definitely not least, thanks to all of you who had a hand in organizing and planning this year's AGM.

It was an informative AGM in a comfortable setting. You did a great job! ♦

FBCWA resolutions

5. Whereas:

- Woodlot licences that have been severely affected by the pine beetle to the point that they do not have any merchantable wood available for harvest; and
- They are faced with no chance to have their woodlot operate as a viable small business; and
- The woodlot has a proven exemplary forest management record;

Be it resolved that the Executive gives consideration to:

- Requesting the MFR to consider expanding these existing woodlots to the current maximum size to allow these proven performers to continue to manage their tenures as viable business and contributors to the local economy.

Moved: Anne Davidson
Seconded: Marvin Strimbold
Membership: Carried
Directors: Defeated

6. Whereas:

- Many licensees are now over 65;

Be it resolved that the Executive gives consideration to:

- Allowing these licensees the option of removing their Schedule A lands from the woodlot licence.

Moved: Anne Davidson
Seconded: Marvin Strimbold
Membership: Carried
Directors: Defeated

7. Whereas:

- Schedule A lands are providing an environment for wildlife, clean water, clean air and a green viewscape for all of society to enjoy; and
- Private land committed to a woodlot at various times has greater social values than growing trees for a future generation; and
- Society as a whole takes little responsibility for the maintenance of this greenscape, but expects it to remain intact;

Be it resolved that the Executive gives consideration to:

- Investigating the applicability of financial recognition for the owners of private lands that promote exemplary land stewardship and management practices on their private land portion of a woodlot. This could be accomplished through supporting and participating in the Ecological Goods and Services

recognition program that the BC Cattlemen's Association is currently pursuing.

Moved: Anne Davidson
Seconded: Marvin Strimbold
Membership: Carried
Directors: Carried

8. Whereas:

- Some licensees feel they cannot afford to attend the AGM, especially during the current economy; and
- There appears to be a predominance of grey-haired people at the 2008 AGM; and
- Not enough licensees bring families to the AGM, yet families are involved in the vast majority of woodlot licences;

Be it resolved that the Executive gives consideration to:

- Investigating the possibility of finding a suitable woodlot location where a family field camping-based AGM venue could be secured, with the goal of reducing licensee cost, and adding loads of fun and family participation for mid-September 2009 or future AGMs.

Moved: David McBride
Seconded: Wolfram Wollenheit
Membership: Carried
Directors: Carried ♦

Links of interest

- Learn about issues on private woodlots south of the border: www.treefarmssystem.org
- One- and three-month Coast and Interior log market reports: www.for.gov.bc.ca/hva/logreports.htm
- 2007-08 silviculture statistics for BC, including annual estimates of not satisfactorily stocked land, area planted, etc., with links to previous years' information: www.for.gov.bc.ca/hfp/silviculture/statistics/2007-09.htm
- BC Forest Safety Council appoints Bev Briscoe as new Chairperson: www.bcforestsafesafe.org ♦

Adaptive management can foster resilience, diversity

old forests — can be seen from many of our towns and cities.

Through fire suppression, we have curtailed many wildfires, especially those starting on the cooler east slopes. An example is Tweedsmuir Park, where the latest pine beetle epidemic got its start. There is a strong case for arguing that fire suppression is a cultural intervention. In the Jasper Model Forest, there has been a detailed look at this issue and the forest is now managing for fuel risk, using the pre-European disturbance as a template to moderate a strict natural pattern.

In the future, we can possibly model the unpopulated stretches of BC forest after the pre-European pattern, while accounting for climate warming, but in the interface zone, we need an approach that provides the resources and services demanded by the public while offering an adaptive forest capable of changing with the warming climate. (Climate change is a fact; visit www.pacificclimate.org for an examination of data from the past 100 years.)

Two papers from Oregon are relevant to the interface forest model for adaptive management. The first, by John C. Bliss and Erin C. Kelly, is titled “Comparative Advantages of Small-Scale Forestry Among Emerging Forest Tenures.” (see <http://espace.library.uq.edu.au/view/UQ:108325>.) The main issue is that the societal advantages of small-scale tenures are reason enough to expand the program.

A second paper, “Land Ownership and Landscape Structure: A spatial analysis of sixty-six Oregon (USA) Coast Range Watersheds” by John Bliss, Brooks J. Stanfield, and Thomas A. Spies, looked at ownership patterns and resulting forest

structures. They found that “(1) forest cover diversity increased with land ownership diversity, (2) size of forest patches increased with size of land ownership patches, and (3) connectivity of forest cover increased with connectivity of land ownership.”

The small private ownership watershed ranked highest for stand complexity and diversity. This is important when looking at resilience and adapting to change. The forests with the most diversity and complexity will fare better than those without.

Large private forests ranked the lowest in complexity and diversity. The disturbance pattern reflected by these watersheds most closely mimics our large tenures.

One argument against small tenures is that they fragment the landscape. While the watershed study confirmed this, some studies and knowledge gaps suggest that the semi-permeable structure of the small-scale tenure may be beneficial to some species.

In the interface zone, existing regulations on visual retention, recreation, water and wildlife reduce the risk of large openings. The size of the licence also keeps openings small, as the annual cut is small and cannot be concentrated in blocks larger than five years of cut (unless fire or beetle cause catastrophic loss).

This results in a semi-permeable fragmentation. In the words of one researcher, “What is seen as fragmented habitat for some organisms could also act as a semi-permeable landscape for organisms traveling between larger, more contiguous tracts of forest habitat.” (Mladenoff *et al.*, 1995)

One information gap recognized by forest science is the relationship between

small fragmented forest cover and habitat. Most studies have linked fragmentation problems to the agricultural field edge and the forest. “There is a caveat about research on edge effects. A large portion of it has been undertaken along edges in agricultural landscapes where the forests have been reduced to isolated woodlots rather than in a perforated forest landscape,” says Malcolm L. Hunter Jr., in *Creating a Forestry for the 21st Century*.

Further replication of this work in forested landscapes is necessary. For example, some studies have not shown a predation/edge effect in a perforated forest landscape (Ratti and Reese 1988, Rudnický and Hunter 1993).

Anecdotal information from woodlot licensees suggests the perforated interface zone is creating a favourite habitat area for wildlife. (George Delisle, Boundary Forest District).

A diversity of approaches leading to a diversity in our forests seems like a no-brainer, but increasingly we are regulated to do everything the same way. The strength of adaptive management is the opposite approach, the ability to try alternate approaches.

Through the generations, this becomes a tradition, and as with the pre-European disturbance pattern, a cultural disturbance pattern that pays attention to the health and growth of the forest in the interface zone will in the long run maintain a forest structure that has the greatest resilience, based on stand complexity and species diversity. This is the approach most likely to succeed when faced with a changing climate and with social demands for sustainable long-term forests. ♦

Advertising Rates

As a service to FBCWA members, the Woodland Almanac will make space available for non-commercial ads, free of charge. Commercial advertising space is also offered to enterprises at the following rates:

- Business card\$50
- Quarter page ...\$135
- Half page\$175
- Full page.....\$250

There is a 10% discount for ads appearing in two or more issues.

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Wildlife and Cattle Grazing in the East Kootenay

Complaint Investigation 060724

FPB/IRC/144

July 2008

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The Investigation

The complainant, a retired range agrologist, is concerned that Crown rangelands in the East Kootenay area of the Rocky Mountain Forest District are not being managed appropriately. The complainant says that forest in-growth on grasslands has caused forage supply to decline, forcing the Ministry of Forests and Range (MFR) and individual ranchers to reduce the number or duration of cattle grazing on Crown lands. Concurrently, the complainant believes that the Ministry of Environment (MOE) has allowed elk and deer numbers to increase such that the carrying capacity¹ of Crown range has been exceeded, causing forage to be over-used. A government plan to restore forage supply, as described by the Kootenay-Boundary Land Use Plan, has apparently not kept pace with either forest in-growth or forage demand. In the complainant's view, this has resulted in lost ranching opportunity and over-grazed wildlife winter ranges.

The complainant wants government to implement an effective ecosystem restoration program and to reduce wildlife numbers so that Crown range is not over-used.

Background

Wildlife and cattle have shared the East Kootenay grasslands for over one hundred years. Both uses are publicly-valued features of the Rocky Mountain Trench landscape. However, for decades there has been conflict about use and allocation of the area's forage resources. Ranchers argue that there are too many elk and deer; hunters, guides and environmentalists claim that there are too many cattle and that grassland habitats are generally mismanaged.

One point of agreement, however, is that the primary source of the conflict is a dwindling forage supply. Over the past half-century, many East Kootenay grassland and open forest habitats have been overcome by forest encroachment and in-growth. Many people believe that before 1950, most invading trees were kept at bay by periodic low-intensity wildfires. Since then, fire suppression and a favourable climate have allowed new trees to grow; changing what would otherwise be a "fire-maintained" mosaic of grassland and open forest ecosystems into a dense, unproductive thicket of coniferous trees.

More than a decade ago, to help document the problem, the complainant and a government ecologist compared aerial photos from the 1950s to the early 1990s. They calculated that over 100,000 hectares of grassland and open-forest habitat in the Trench had been overcome by trees since 1952, an average loss of some 3,000 hectares per year.

One result of forest in-growth and encroachment is that the physical amount of grassland and open forest declines, and the abundance and productivity of desired grassland species is

¹ In essence, carrying capacity is the number of organisms an ecosystem can support without significant negative impact to either the organisms or the ecosystem.

reduced. Cattle and wildlife are forced into smaller and less productive foraging areas. As forage availability and condition declines, competition and conflict over use of the remaining forage (including that on private land) escalates. Unless resource management or nature adjusts the numbers or duration of use, the increased grazing pressure can further damage the ecosystem.

By the early 1990s, government and range users had recognized the problem. In 1995, government agencies, led by MFR and supported by environmental groups and ranchers, undertook to develop a restoration program on Crown lands² in the fire-maintained ecosystem of the Trench. The project was later finalized in the 1995 Kootenay-Boundary Land Use Plan, the 1997 Kootenay-Boundary Land Use Plan Implementation Strategy, and legally formalized by the 2002 revised Kootenay-Boundary Higher Level Plan Order.

An objective of the Kootenay-Boundary Higher Level Plan Order is to restore and maintain the ecological integrity of fire-maintained ecosystems. That intent is also an objective “set by government” under the *Forest and Range Practices Act* (FRPA) and, as such, carries some legislative weight. However, none of the land use planning documents set targets that must be met for the rate or amount of ecosystem restoration. That was left to government’s resource ministries to decide. The land use documents simply provide a framework for implementation of the project over time.

Ecosystem restoration in the Trench is a collaborative effort of several government agencies and non-government organizations represented by the *Rocky Mountain Trench Ecosystem Steering Committee*. MFR is the lead agency, but the steering committee is responsible for planning and delivery of the restoration program. There are 250,000 hectares of fire-maintained ecosystem in the forest district. In 2006, the steering committee set a goal to re-establish and/or maintain the structural characteristics, species composition and ecological processes on 118,500 hectares of Crown grassland and open forest habitats within that ecosystem over 30 years (from 2000 to 2030). Site treatments include some or all of forest harvesting, thinning, pruning, prescribed burning and grass seeding, depending on the ecological condition and specific objectives at each site.

Through restorative treatments, the steering committee hopes to reduce wildfire risks; increase cattle and wildlife forage; improve availability of plants important to First Nations; reduce wildlife damage to private land; improve forest health and timber quality; and restore biodiversity and habitat for many grassland species.

² These and other agencies also undertake or assist with restorative works on private and protected lands, but those projects are not within the scope of this investigation.

Discussion

1. Is Crown forage in the East Kootenay over-used?

The complainant states that the Crown forage resource is in a declining condition, indicating continual over-use. The complainant noted that a comprehensive study of vegetation and forage use, completed a decade ago,³ confirmed that the combination of wildlife and cattle use of Trench grassland and open forest habitats exceeded what most agrologists, biologists and ecologists would consider a safe degree of use.⁴

At the time, a stewardship rule-of-thumb was that wildlife and cattle should each be allocated 25 percent of the available forage, with the remaining 50 percent left on-the-ground for ecosystem health. The study, which collected data from 1991 to 1994, found that cattle and wildlife use was approximately equal, but that they together exceeded the recommended amount of use (50 percent) at all sites.⁵ In short, the grassland ecosystem was over-used.

Since then, government's resource ministries say that not only has the land base for forage supply continued to shrink, but the productivity of the remaining forage plant communities has continued to decline.⁶ Excessive grazing causes a change from preferred climax (or old-growth) plant communities to younger, less productive successional stages. MFR's current goal is to maintain the Trench's forage plant communities at a mid-successional stage or better.

As a measure of sound stewardship, MFR agrologists look for either a steady or improving state in grassland condition. To do that, MFR maintains grazing exclosure plots. Those plots indicate to the agrologists that overall condition of grasslands in the Trench is declining, contrary to MFR's management goal.

To achieve an improved grassland condition, MFR agrologists now believe that about 60 percent of available forage (not the 50 percent suggested in the original stewardship rule) must be left for ecosystem health. MFR believes that such a limited degree of forage use (40 percent) is not being achieved anywhere. The allocation and use of forage resources by both wildlife and cattle creates a significant stewardship problem. MFR and MOE both gave examples of over-use of forage by wildlife and cattle. The ministries agree that ecosystem restoration can improve carrying capacity and both believe that use and allocation of forage needs to be better coordinated.

Finding

Crown forage in the East Kootenay is over-used.

³ Gayton, D., and M. Hanson, *Final Report; East Kootenay Trench Agriculture Wildlife Committee*, unpublished report, 1998, Ministry of Forests, Nelson, BC.

⁴ As averaged across monitored sites.

⁵ Depending on the year and the site, combined use by wildlife and cattle ranged from 50 percent to 73 percent.

⁶ Ministry of Forests and Range, Ministry of Agriculture and Lands, and Ministry of Environment, *Strategy for Management of Rangeland Ecosystems in the East Kootenay*, unpublished report, 2006, Cranbrook, BC.

2. Is the ecosystem restoration project sufficient to overcome loss of grassland habitats?

The complainant is concerned that the ecosystem restoration project has not reversed the loss of grassland and open forest habitats. In its 2006 report, *Blueprint for Action*, the steering committee reported that it would need to treat 4,500 hectares per year to reach its 30 year goal.⁷ So far, reported treatments total only 3,600 hectares per year (1997/98 to 2006/07).

The complainant has two concerns with those numbers:

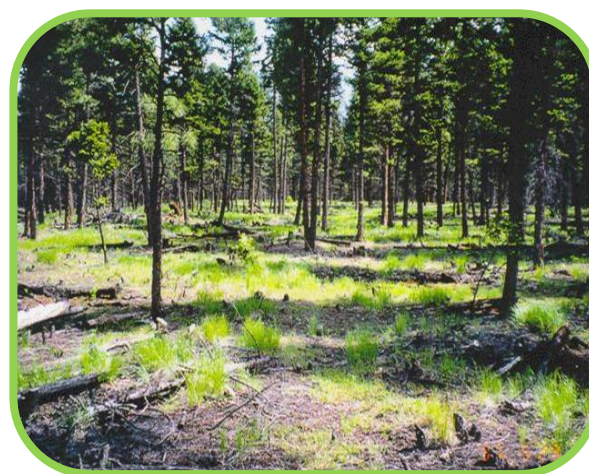
- The earlier air photo comparison indicated that over 3,000 hectares continue to be lost each year to forest in-growth and encroachment. Therefore, the program appears to be insufficient to meaningfully overcome the loss.
- The reporting may be misleading. The complainant believes that a hectare that is first logged and then burned is counted as treatment of two hectares.

Treatment rate and loss of grassland habitats

MFR was unable to provide a current rate of grassland and open forest loss. Within the extent of the fire-maintained ecosystem, MFR noted that areas that were likely to have been overcome by trees have, for the most part, already been invaded. Therefore, MFR believes the rate of invasion is now less than 3,000 hectares per year. Since the steering committee intends to restore all the area within the ecosystem that can be maintained as grassland or open forest, it anticipates that any area that it successfully restores will help achieve its goal.

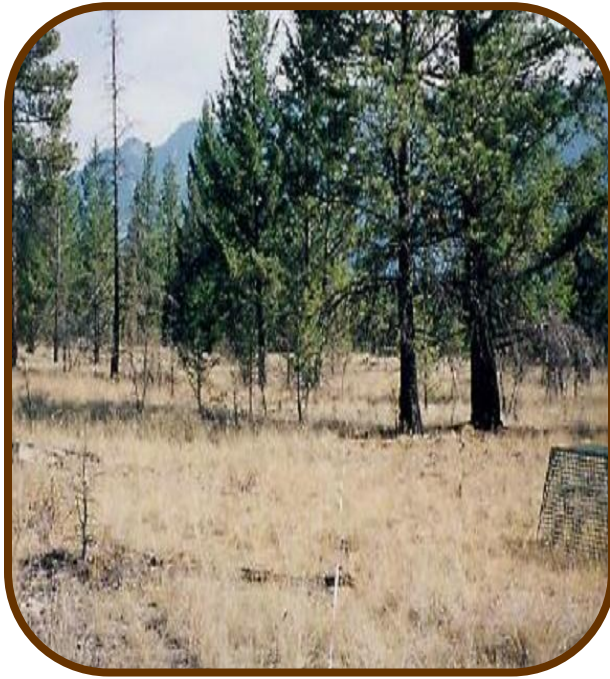


July 2003 – BEFORE treatment
- photo by MFR



July 2006 – AFTER treatment
- photo by MFR

⁷ The steering committee's estimate of 4,500 hectares per year was based on projected treatment of 118,500 hectares. See: Rocky Mountain Trench Ecosystem Restoration Steering Committee, *Blueprint for Action*, 2006. <http://www.for.gov.bc.ca/drm/erp/Blueprint2006.pdf> (accessed January 2008). However, MFR recently adjusted that goal; restorative treatments will now occur within a grassland and open forest area of 116,040 hectares, which after 30-years, should all be in "maintenance" condition.



August 2001 – BEFORE treatment

- photo by MFR



August 2005 – AFTER treatment

- photo by MFR

In addition, MFR advised the Board that it has recently reduced the committee's original restoration goal of 118,500 hectares to 116,040 hectares, based on more up-to-date mapping. While that change is relatively minor, the forest ministry is also undertaking a more detailed analysis to categorize how much of the grassland and open forest area:

- was already in maintenance condition;
- has been restored;
- is under restoration; and
- is planned for future treatment.

The ministry believes that some thousands of hectares were already in a maintenance state when the restoration project commenced, so not all of the 116,040 hectares will need to be treated by 2030 (as originally thought). Although MFR has not yet determined how much area will initially need to be treated, it now anticipates that the required annual treatment rate will be substantially less than the 4,500 hectares reported earlier; perhaps fewer than 3,000 hectares per year. The reduced figure would be more in-line with what the program has been able to accomplish so far.

Projected treatment rates aside, the ministry cited a number of limitations on the amount of area that can be treated each year:

- ministry capacity to administer and implement the restoration program
- the complexity of inter-agency and industry coordination

- the inferior quality, poor marketability and harvest expense of the timber involved
- winter grazing that removes the fine fuels needed for burning
- a lack of contract labour needed to complete mechanical treatments
- a short window available for safe burning
- public concerns with smoke management

These constraints are significant and, even with a reduction of the annual target, could pose a substantial barrier to achieving full restorative treatment by 2030. For example, a series of too-wet or too-dry burning periods could easily upset whatever treatment schedule is ultimately decided. In addition, because one object of the project is also to *maintain* restored areas, some previously treated areas will likely require additional treatment in time. That means, as the project progresses, an increasing amount of area may have to be treated each year just to keep up.

To accelerate the project, the complainant suggested that government provide increased funding; perhaps as much as \$1 million per year. In October 2006, government coincidentally announced it would contribute a further \$2 million provincially to fire-maintained ecosystem restoration (for fiscal year 2007/08). About \$650,000 of that was allocated to the East Kootenay area and brought that project's total funding to near \$1 million. MFR said that \$1 million was appropriate to the work it could annually complete in the Trench because of weather constraints, the poor log market and a shortage of contract labour. MFR received similar funding for 2008/09 and expects the same next year.

MOE also funds the restoration program. In fiscal year 2007/08 it spent over \$500,000 on restoration activities on the lands it manages, and obtained and contributed additional in-kind and financial support for restoration projects from the Habitat Conservation Trust Fund and the Fish & Wildlife Compensation Program.⁸

In summary, the annual treatment rate to date has fallen about 20 percent short of the program's currently reported goal. However, MFR predicts that improved mapping and a map analysis project now in progress will reveal that the achieved treatment rate is actually appropriate to conditions on-the-ground. It appears that government's increased and recently stable funding of the project is appropriate to the project's scope and the amount of work that can be physically accomplished each year.

Reporting of Area Treated

The complainant correctly observed that treated areas are sometimes double or triple counted. However, MFR openly acknowledged this accounting practice. The report, *Blueprint for Action*, clearly states that the sums of the treatments do not represent the total area treated. Not every area burned is fully treated, and some areas are harvested but not burned. The prescription depends on the site and the objectives needed to achieve recovery.

⁸ See: <http://www.hctf.ca/> and <http://www.fwcp.ca/>

It is significant that an account of the area treated does not necessarily indicate area restored. Once treated, it may take many years for the site to fully recover.⁹ MFR said that compiling the precise number of hectares fully treated—and restored—is not an immediate priority. Nevertheless, MFR estimates that at least 22,000 hectares have been fully treated since 1997.

To the Board, it seems that the true measure of success for ecosystem restoration in the East Kootenay is not the total area fully treated, but rather a documented, positive and continuing trend in the overall amount and condition of grassland and open forest habitats. MOE advised the Board that the ministry and its partners are developing the means to examine rangeland health and productivity associated with ecosystem restoration activities but, as yet, such assessments are “subject to resource constraints.” Such assessment work will be critical to understanding whether the restoration program’s 30-year goal of a restored grassland and open forest landscape is achieved.

Finding

Ecosystem restoration activities are ongoing, at a rate of 80 percent of what was originally planned (3,600 of 4,500 hectares per year). However, MFR believes that the reduced treatment rate may actually be appropriate to conditions on-the-ground. If so, it seems that the ecosystem restoration project is sufficient to overcome loss of grassland habitats. Nevertheless, it is the trend in ecosystem condition, not area treated, that must be assessed to determine overall success of the restoration program.

3. Have elk and deer numbers increased beyond the carrying capacity of the ecosystem to support both wildlife and cattle?

The complainant asserts that MOE has allowed elk and deer numbers to increase beyond that which the ecosystem can support in combination with cattle.

MOE acknowledged that elk and deer numbers have increased in the Trench since the populations crashed during the severe winter of 1996/97. In 2001, MOE implemented a recovery strategy for elk.¹⁰ MOE replaced that strategy in 2005, in response to expansion of the elk population.¹¹



Bull elk in winter.

- photo by MOE

⁹ See: <http://www.for.gov.bc.ca/HRE/ecoeath/ordroad/DryforMonSum.htm>

¹⁰ Ministry of Environment, Lands and Parks, 2001. *East Kootenay Elk Management Plan: 2000-2004*. http://wlapwww.gov.bc.ca/kor/emp/emp_2000.pdf (accessed January 2008).

¹¹ Ministry of Water, Land and Air Protection, 2005. *East Kootenay Elk Management Plan 2005-09*.

MOE did not prepare a similar management strategy for deer. However, from hunting statistics and fawn survival counts, MOE believes that white-tailed deer have recovered from the 1996/97 population crash. In response, MOE recently increased hunting pressure on white-tailed deer. MOE also believes that mule deer have recovered in some, but not all, areas. The ministry is currently developing a mule deer strategy for its southern interior region, which includes the East Kootenay.

MOE's current objective for elk in the East Kootenay is to manage the population within the habitat's carrying capacity. However, MOE has no reliable estimate of that carrying capacity; nor does it precisely monitor elk habitat condition (MOE will begin a project during the summer of 2008 to update its information on rangeland health). Although it is currently operating to increase migratory elk numbers, MOE does not at present have a target for size of the overall elk population.¹²

To assess the relative abundance of elk, the ministry typically relies on periodic surveys of herd productivity,¹³ indicators of human demand for elk, rancher tolerance of elk damage, hunting statistics, and habitat condition. In early 2008, MOE did an elk survey and determined that between 12,000 and 16,000 elk were wintering in the Trench. The ministry is confident that the current elk population is higher now than in 1992 (then 11,000 to 12,000 animals) when the population was generally believed to be at carrying capacity.¹⁴

Early in the investigation, MOE told the Board that, if there are good hunting opportunities, if grasslands are healthy, and if wildlife damage to private land is kept to acceptable levels, then the actual number of elk does not matter. The Board considered that the indices used by the ministry indicated a problem—the grasslands are not healthy and wildlife damage to private land is relatively severe.¹⁵ MOE recently adjusted its previous management philosophy and, having now assessed the number of elk; it will determine a target population size that is within carrying capacity.

MOE's revised approach seems appropriate (assuming carrying capacity can be reliably defined) but misses the potential relationship of elk (and other wildlife) to the more immediate problem of declining grassland condition and conflict over available forage. In that regard, MOE believes

¹² MOE objected to these statements citing two calculations of carrying capacity it included in its 2000-2004 elk management plan. However, MOE's subsequent 2005-2009 elk management plan challenged the validity and utility of those earlier calculations. MOE is currently recalculating carrying capacity in order to establish population targets for both elk and deer.

¹³ Such as age and sex ratios, and calf survival.

¹⁴ MOE's 2000-2004 elk management plan included two calculations of carrying capacity; either 16,500 elk or 7,600 to 9,130, depending on the method of calculation and habitat area considered.

¹⁵ Available estimates of crop damage range from 20 to 30 percent or more (in Malmberg, M., *Wild Ungulate Exclusion Fencing Program Survey*, unpublished report, March 2007). The 2006 report, *Blueprint for Action*, states that 4,635 hectares of private ranch and hay lands in the Trench were fenced between 2001 and 2005 to keep elk and deer out (this reduced private-land crop and forage losses to wildlife but must also have resulted in greater wildlife grazing pressure on nearby unfenced Crown and private lands).

that it is some 2,000 to 4,000 non-migratory elk (known as Trench elk) that create much of the conflict over forage in the Trench; not the overall number of wintering elk.

MOE's goal for management of the non-migratory Trench elk is to maintain their productivity, but reduce herd size each autumn by about 25 percent (500 to 1,000 animals) through new and increased antlerless-elk hunting seasons. In 2007 and 2008, MOE fitted about 80 wintering elk (both migratory and non-migratory) with radio-collars to study their movements and life history. Prior to that, MOE could only estimate the number of elk when they were visible on their winter ranges; it could not estimate forage use by elk during the other seasons. By monitoring both the resident and migratory elk, MOE hopes to better manage all elk within the bounds of the available habitat and obtain sufficient information to collaborate with MFR in setting appropriate grazing allocations for both cattle and wildlife. In addition, MOE recently began a new provincial program aimed at increasing hunting, decreasing agricultural impacts, and improving private land stewardship in agricultural settings.

In summary, white-tailed deer have largely recovered from the population crash of 1996/97. Although MOE has no specific management strategy for white-tailed deer, it is now increasing hunting pressure on that species. Elk have also recovered from the 1996/97 crash to levels higher than that of the early 1990s. MOE's strategy for elk is to continue to increase the migratory herd and reduce the non-migratory herd, while staying within the carrying capacity of the habitat (as indicated by grassland condition among other indices). However, MOE's ability to swiftly and exactly determine and manipulate either elk numbers or the degree of forage use by elk is limited.

This situation creates a quandary. A comprehensive multi-agency study of grassland condition using data from the early 1990s concluded that the East Kootenay grassland ecosystem was over-used. The study attributed the total use of forage equally to wildlife and cattle, but did not suggest which was at fault. It seems reasonable to assume that over-use is complex and that, on shared ranges, both wildlife and cattle contribute to some degree through either the timing or degree of use.

Grassland habitats were over-used in the early 1990s when elk and white-tailed deer populations were likely lower than they are today. Overgrazing continues to be an issue today, particularly on ranges used year-round by the non-migratory Trench elk. In addition, MFR has indicated that, overall, both availability of forage and grassland condition have continued to decline since the 1990s, even with a temporary elk and deer population crash. The administrative assignment of forage between cattle and wildlife has not changed (it remains at 25 percent to each). These factors indicate that grassland carrying capacity continues to be exceeded by the current combination of both wildlife and cattle.

Finding

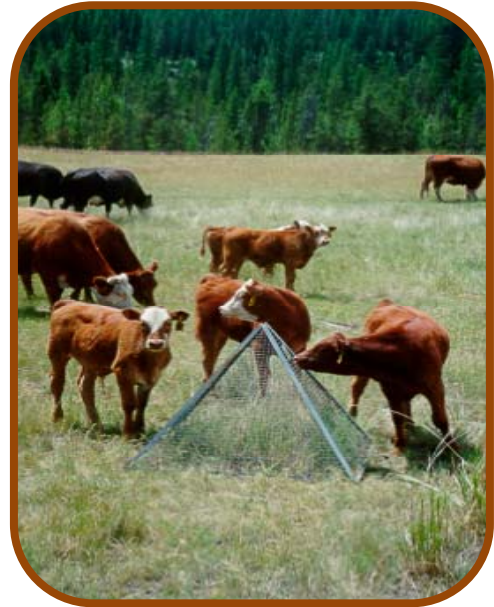
Elk and deer numbers have increased over the past decade. It appears that the combination of wildlife and cattle use continues to exceed the carrying capacity of the grassland ecosystem.

4. Has cattle use of Crown forage declined?

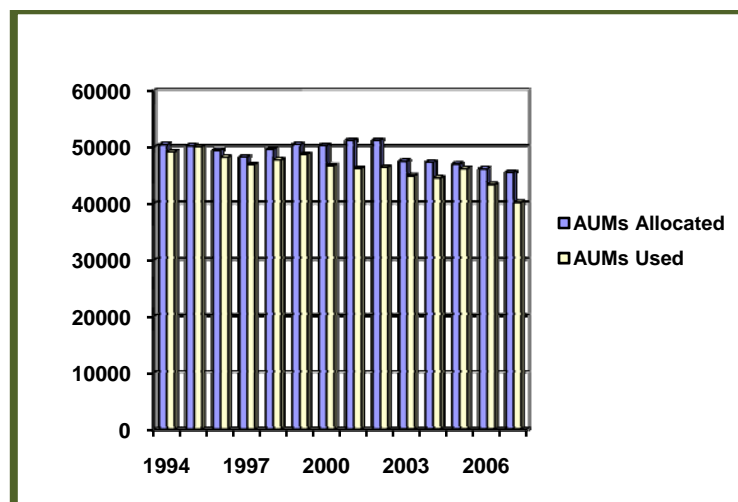
The complainant asserts that the cattle industry has lost grazing opportunity and that cattle numbers on Crown range have declined.

The current annual grazing allotment in the Rocky Mountain Forest District is about 45,500 animal unit months (AUMs),¹⁶ which MFR translates to about 9,000 cows and a few horses. The typical grazing season is about five months, from May to October.

The holder of a grazing licence or permit must report its use of AUMs to government if it uses fewer than 90 percent of its allocated amount.¹⁷ Each ranch must pay to the Crown an annual fee based on its forage allocation and reported use.¹⁸ The Board used MFR's billing data to calculate livestock use.¹⁹ Records were available from 1994 to 2007.



Cattle with a small grazing exclosure plot.
- photo by MFR



¹⁶ An animal unit month (as defined in the *Range Act*) means 450 kg of forage, measured on a dry matter basis, being the amount of forage that would sustain (a) for one month, an average cow of the genus *bos* with an unweaned calf born in the current calendar year, or (b) for a period longer or shorter than one month, an animal within a class or species of animal described in the definition of cattle, depending on the type of animal, its stage of development, or both.

¹⁷ The district has also recently implemented a policy that actual use be reported annually by all tenure holders, not just those that use less than 90 percent of their allocated AUMs. The district is in the process of summarizing that data but it is, as yet, incomplete.

¹⁸ Section 51 of the *Range Act* and section 15 of the *Range Regulation*.

¹⁹ AUMs used = AUMs allocated – (Usage fee/AUM rate). The *Range Act* allows for a minor amount of non-use to go unreported. Therefore, using the billing data to calculate the number of AUMs used each year gives the reported maximum; the actual number of AUMs used in-the-field could be slightly less.

The 14-year average of AUMs allocated is 48,856. The last five years has been less than average. The current allocation is about eight percent less than that allocated in the period 1994 to 1996.²⁰ MFR said that it reduced the allocation of AUMs because forage is lacking.

The number of AUMs allocated is not necessarily consistent with actual use of grassland resources. Nor is it indicative of the intensity of use at a particular location. Reported use of AUMs, as calculated from the billing data, is down about 12 percent from 1994-1996 to 2005-2007.²¹ The complainant, based on personal knowledge of individual ranches, believes that the overall amount of voluntary non-use is nearly twice that indicated by the billing records.²² Declining use of Crown forage by cattle could be the result of many influences including market conditions (for example, the recent mad cow disease scare), sale or development of private ranch land, herd type, production costs and forage availability (such as persistent drought conditions or over-use by wildlife). MFR's view is less complicated; it believes the decline in forage use is simply because of a decrease in forage availability.

MFR said that it fills every available grazing opportunity. The ministry's annual reports indicate that most of the Crown rangeland available for grazing is typically allocated. Even so, the number of grazing tenures in the forest district declined by about nine percent from 1994-1996 to 2005-2007, indicating either fewer ranches or amalgamated tenures. Regardless, since the overall amount of Crown land allocated to grazing cattle in the forest district is relatively constant, it is almost certain that cattle use of Crown forage has declined.

Finding

It appears that cattle use of Crown forage has declined by about 12 percent over the past decade.

5. Coordination of wildlife and cattle use of Crown forage

MFR is responsible for the allocation and management of Crown forage. MOE has the responsibility to manage wildlife numbers and, for ungulates, may designate ungulate winter ranges under FRPA to ensure that sufficient winter habitat is identified and maintained. MOE has already established much of the Trench as ungulate winter range. In those areas, general wildlife measures can give direction to forest and range tenure holders on how to manage their operations to maintain suitable and sufficient habitat. The agencies are working on measures for range management, but these are not yet in place.

Although the two ministries meet regularly over the winter months to discuss grazing issues; there is no formal process to coordinate wildlife population targets (i.e., the satisfaction of public demand for wildlife) with forage allocation to cattle. Management decisions about

²⁰ 3-year average: 1994-1996 = 49989; 2005-07 = 46179.

²¹ Calculated from MFR billing records. 3-year averages 1994-1996 (49085) and 2005-2007 (43207).

²² A ranch that grazes less than 90 percent of its AUM allocation must report its actual use.

wildlife influence forage availability for cattle, and management decisions about cattle influence forage availability for wildlife. MFR and MOE do not fully integrate the management of cattle and wildlife in the ecosystem.

There are many barriers to effective coordination:

- It is expensive and time-consuming to determine carrying capacity for such a complex, multi-value ecosystem.
- There is a lack of reliable inventory for wildlife (elk, deer, bighorn sheep among others).
- Wildlife use of forage can be difficult to predict, monitor, control and adjust on short notice.
- A long-term commitment of staff and resources is required.



Desired open forest.

- photo by MFR

In 2006, MFR, MOE and the Ministry of Agriculture and Lands (MAL) prepared a strategy for better range management and agency coordination.²³ Much of that strategy (including the development of an objective, fair and resource-based allocation of Crown forage between livestock and wildlife) has yet to be implemented. An underlying principle was to manage both livestock and wildlife within the sustainable carrying capacity of Crown rangelands.

Both MFR and MOE reported some success in dealing with site-specific situations of conflict between cattle and wildlife and, with others, are working to plan improvements to some range units. However, both also agreed that current range monitoring demonstrates a declining trend in overall grassland condition. This indicates that current management is not consistent with sustainable range management. There is still no integrated planning for management of forage on Crown land for the two sectors—wildlife and cattle. To achieve improvement, there clearly needs to be greater collaborative planning for production and allocation of forage by area and season, including rational regulation and distribution of the wildlife and cattle users.

In the absence of such collaborative planning, cattle numbers in the East Kootenay have decreased over the past decade while elk numbers have increased. These changes have probably altered impacts to the ecosystem but have not apparently contributed to ecosystem recovery or improvement of grassland condition. It seems counter-productive to ecosystem

²³ Ministry of Forests and Range, Ministry of Agriculture and Lands, and Ministry of Environment, *Strategy for Management of Rangeland Ecosystems in the East Kootenay*, 2006, unpublished report, Cranbrook, BC.

restoration to let elk numbers increase. This could negate any benefit that a reduction in cattle grazing might otherwise provide.

MFR is trying to more precisely calculate ecosystem carrying capacity, which should help to determine an optimal allocation of forage resources between cattle and wildlife, but its efforts are, at present, “limited to available resources.” MOE, working in partnership with MFR, is also developing a work plan to justify a funding proposal to re-assess carrying capacity in the Trench. In the meantime, there remain too many animals to feed.

So far, MFR and MOE have not managed to collaboratively reduce grazing pressure (by wildlife, cattle or both) sufficiently to allow ecosystem recovery toward what both agree is the desired condition. MFR points out that it has done its part by deliberately and significantly reducing AUMs by about 12 percent, and implies that continuing problems with grassland condition are the result of increasing wildlife numbers. The Board is encouraged by MOE’s recent move toward setting a population target for elk based on carrying capacity, and notes that MFR and MOE are talking about ways to assess carrying capacity and improve forage allocation. That reflects willingness by both ministries to move towards further collaboration on this issue.

It is not within the scope of this investigation for the Board to gauge the ecological significance of either wildlife or cattle use of forage in the East Kootenay ecosystem. The Board has no basis to conclude that reduced cattle use was sufficient to reverse the decline in grassland condition or that increased wildlife use has subsequently filled the void.

Finding

Management of wildlife and cattle use of Crown forage is not adequately coordinated. While MFR has reduced cattle use, wildlife populations have increased and the combined use continues to exceed the carrying capacity of the grassland ecosystem. The Board is encouraged that both ministries are discussing the issues and appear to be moving towards better collaboration.

Conclusion

East Kootenay grasslands are in poor condition and have been for a long time. They remain over-used and their condition (and perhaps area) continues to decline. Some ecosystem restoration work is ongoing at a rate of 80 percent of what is currently reported as needed. However, MFR has indicated that improved mapping and analysis in progress should reveal that the treatment rate to date is actually appropriate to on-the-ground conditions.

It is not clear how soon or even whether improvement in forage production and grassland condition will follow restorative treatments. Grassland recovery can take a long time to achieve. Therefore, it is the trend in ecosystem condition, not area treated, that must be assessed to

determine overall success of the restoration program; and timing and intensity of grazing by wildlife, cattle, or both can have a significant effect on ecosystem condition.

Since the early 1990s, cattle numbers in the East Kootenay have decreased. Following the population crash of 1996/97, elk numbers have increased. The effect of that change on the ecosystem is unknown, but monitoring indicates that grassland carrying capacity remains insufficient to meet the forage demands of both cattle and wildlife. In this situation, it seems counter-productive to ecosystem restoration to let elk numbers increase; doing so could negate any benefit that a reduction in grazing pressure might otherwise provide.

MFR and MOE agree that grazing pressure has to be managed in a coordinated fashion to allow ecosystem recovery. This means that cattle and wildlife populations must be managed to reduce grazing pressure overall to retain sufficient forage in-the-field to promote ecosystem recovery toward the desired condition.

Recommendation

Declining cattle numbers should have made a difference to ecosystem health. However, ecosystem health is not improving. The combination of increasing wildlife numbers and reduced cattle use apparently still exceeds grassland carrying capacity. The Board is concerned about the adequacy of government coordination of range and wildlife resource management. Ecosystem restoration is essential. Healthy grassland and open forest ecosystems are not only important for sustainably grazing cattle and wildlife; they also provide for First Nations' traditional use and support many of BC's red-listed species.

Under section 131(2) of the *Forest and Range Practices Act* the Board recommends that:

With appropriate consultation and expert advice, the Ministry of Forests and Range and the Ministry of Environment direct reductions of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

In the Board's view, this could be accomplished by:

- promptly and effectively coordinating activities to determine and address grassland and open forest carrying capacity by range unit
- cooperating to jointly allocate and regulate both wildlife and cattle numbers, and the use of forage by each, on each range unit, to promote ecosystem recovery toward the desired condition

- meeting public demand for both wildlife and cattle, considering whether some range units should have a greater focus on wildlife while others should focus on cattle production
- closely monitoring the intensity of forage use and the timing of use by both cattle and wildlife
- innovating to accelerate ecosystem restoration
- systematically monitoring the efficacy of restoration treatments and the trend in overall condition of grassland and open forest habitats

These concepts (and more) were part of the joint MFR, MAL and MOE February 2006 document, *“Strategy for the Management of Rangeland Ecosystems in the East Kootenay.”* Some aspects of that strategy have been implemented by those agencies; others have not. The ministries could make it a priority to implement the remaining aspects.

Under section 132 of FRPA, the Board asks the Ministry of Forests and Range and the Ministry of Environment to report jointly, in writing, to the Board by December 31, 2008, about the steps they have taken to give effect to the Board’s recommendation.

MFR has already expressed concern about the potential effect of this recommendation on the ranching industry. The ministry noted that a key government objective is to have a healthy, productive ranching sector. It notes that the ranching community has already made significant concessions with respect to reducing cattle numbers in the Trench. MFR believes that to ask ranchers to make further concessions would not be in the interest of the ranching sector or the provincial economy. MOE, on the other hand, supports the Board’s recommendation. It would prefer a forage allocation process that allows for greater wildlife use on critical winter range and greater cattle use in less sensitive areas. The Board’s interest is simply that government coordinate its activities such that the East Kootenay grassland ecosystem is soundly and sustainably managed so as to warrant public confidence.



**Forest
Practices
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NEWS RELEASE

INFORMATION BULLETIN

For Immediate Release

March 23, 2011

Forage Use Recommendation Gets Response

VICTORIA – A Forest Practices Board recommendation to government to reduce forage use on Crown land in the East Kootenay has been responded to by the BC government.

The recommendation was made in 2008 following a public complaint about damage to grassland ecosystems caused by wildlife and cattle grazing in the Rocky Mountain Trench – a conflict that goes back decades.

The response from the Ministry of Forests, Lands and Natural Resource Operations was received by the Board this week and identifies ongoing actions taken to deal with the issue, including reduction of livestock grazing, an elk management plan, and ecosystem restoration projects.

The Board has received the response, notes that government is taking action intended to address the problem, and looks forward to seeing a demonstrated improvement in grassland ecosystem condition.

The original complaint investigation report and government's response are available on the Board's website at http://www.fpb.gov.bc.ca/IRC144_Wildlife_and_Cattle_Grazing_in_the_East_Kootenay.htm?__taxonomyid=130.

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More information can be obtained by contacting:

Helen Davies, Communications
Forest Practices Board
Phone: 250 213-4708 / 1-800 994-5899

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Wildlife and Cattle Grazing in the East Kootenay

The complainant, a retired range agrologist, is concerned that Crown rangelands in the East Kootenay area of the Rocky Mountain Forest District are not being managed appropriately.

[Download Full Report](#)



File: 97250-20\060724 E Koot Crown Range

March 25, 2011

Doug Konkin, Deputy Minister
Ministry of Forests, Lands and Natural Resource Operations
Box 9352 Stn Prov Govt
Victoria BC V8W 9M1

Dear Doug Konkin:

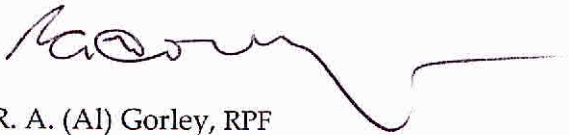
Re: Response to Recommendation, Investigation 060724; *Wildlife and Cattle Grazing in the East Kootenay*

Thank you for your March 17, 2011, letter responding to the Board's 2008 recommendation that:

With appropriate consultation and expert advice, the Ministry of Forests and Range and the Ministry of Environment direct reductions of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

You responded with a summary of ongoing actions concerning livestock grazing, elk management, and ecosystem restoration. In addition, your now-combined ministry intends to undertake a review in the near future to determine whether additional actions are warranted. I encourage you to put a high priority on completing that review, to help inform and address continuing public and industry concerns and perceptions about grassland ecosystem management in the area. Having received your response we will close the file on this investigation. However, the Board will continue to observe the East Kootenay situation with interest and with a view toward demonstrated improvement of grassland ecosystem condition.

Yours sincerely,



R. A. (Al) Gorley, RPF
Chair

cc: Grant Griffin, Complainant

Ref: 176036

MAR 17 2011

Al Gorley, RPF
Chair, Forest Practices Board
1675 Douglas St 3rd Fl
PO Box 9905 Stn Prov Govt
Victoria BC V8W 9R1

Dear Mr. Gorley:

On behalf of the Ministry of Natural Resource Operations (MNRO), please accept this letter as our response to the Forest Practices Board's recommendation in its investigation report, *Wildlife and Cattle Grazing in the East Kootenay* (July 2008).

Board's recommendation

With appropriate consultation and expert advice, the Ministry of Forests and Range and the Ministry of Environment direct reductions of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

Government's response

First, I would like to thank the Forest Practices Board for its patience in awaiting government's response to this recommendation.

We understand that the intent of the Board's recommendation is to restore and maintain the health and productivity of Crown rangelands in the East Kootenay. To this end, we are pleased to advise the Board that government has taken and will continue to take steps to achieve this objective.

Over the past several years, the following actions have been taken to reduce grazing and restore rangeland ecosystems in the East Kootenay Trench:

1. Rocky Mountain District has made efforts to reduce livestock grazing by not issuing new grazing tenures when Animal Unit Month (AUMs) are surrendered;
2. Fish, Wildlife and Habitat Management Branch has developed a five-year elk management plan that identifies range health and crop depredation as issues requiring attention and establishes wildlife population objectives (including reductions) for the southern trench population; and,

/2....

3. With guidance from Range Branch and Fish, Wildlife and Habitat Management Branch, the Rocky Mountain District has been carrying out ecosystem restoration activities in the East Kootenay Trench that are helping restore and enhance forage production; in fact, a substantial portion of the provincial ecosystem restoration budget has been invested in the East Kootenay over the past several years.

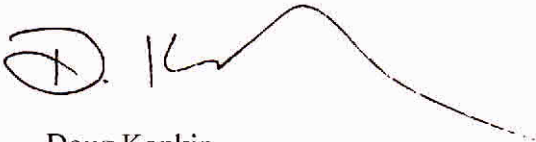
These ongoing efforts are helping reduce both livestock and wildlife grazing as well as restore ecosystem integrity in the East Kootenay.

In addition to these ongoing actions, the Ministry plans to conduct an internal review in the near future to determine if any incremental actions, such as reducing AUMs allocated to domestic livestock in some range units or further reduction of wildlife ungulate numbers, is warranted. This internal review will consider the outcomes of ecosystem monitoring projects undertaken in the East Kootenay over the past 10 years and will be strengthened by the fact that range and wildlife management are now under the same ministry.

However, I must also emphasize that government will continue to take a moderate, progressive approach to improving rangeland health in the East Kootenay in a manner that does not adversely impact this region's ranching sector and hunting community.

If the Board has any questions or would like more information regarding government's actions to address the Board's recommendation, please contact David Borth at 250 371-3836.

Sincerely,

A handwritten signature in black ink, appearing to be 'DK' followed by a long, sweeping horizontal line that curves slightly upwards at the end.

Doug Konkin
Deputy Minister

pc: David Borth, Director, Range Branch
Tom Ethier, Director, Fish, Wildlife and Habitat Management Branch
Ray Morello, District Manager, Rocky Mountain District



Forest Practices Board

File: 97250-20/060724 East Kootenay Crown Range

September 8, 2009

Via Email

David Borth, Director
Ministry of Forests and Range
515 Columbia Street
Kamloops, BC V2C 2T7

Kaaren Lewis, Director
Ministry of Environment
Box 9338 Stn Prov Govt
Victoria, BC V8W 9M1

Dear David Borth and Kaaren Lewis:

Re: Complaint 060724 East Kootenay Crown Range – Recommendation Response

Thank you for your July 22, 2009 letter in response to the Board's recommendation in its July 2008 investigation report, *Wildlife and Cattle Grazing in the East Kootenay*. In that report, the Board expressed concern about government coordination of range and wildlife resource management and the state of grassland ecosystems in the East Kootenay. The Board recommended that government direct reduction of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

At the ministries' request, the Board twice extended its deadline for response to the recommendation, giving the ministries a full year to reply. It appears that the work envisioned by the Ministries is still in progress and that you are now projecting the emergence of an approved action plan by March 31, 2010. You also mention that you will provide periodic updates to the Board during the fall of 2009. I can appreciate that current workloads and budget limitations are taking their toll on staff expected to prepare the range management approach. Could you please provide the Board with an update on progress by November 15, 2009, particularly indicating what options might be under consideration, and any indications that the March date might slip. We would be concerned if another field season of range management opportunity were to be missed.

On that basis I accept your response provisionally and extend the final conclusion on our recommendations to March 31, 2010.

Yours sincerely,

Bruce Fraser, PhD
Chair

cc: Grant Griffin

File: 15380-03

July 22, 2009

Dr. Bruce Fraser
Forest Practices Board
3rd Floor, 1675 Douglas Street
PO Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 9R1

Dear Dr. Fraser:

On behalf of the Ministry of Forests and Range (MFR) and the Ministry of Environment (MoE), would like to take this opportunity to provide an interim response to the Forest Practices Board's recommendation in its investigation report, *Wildlife and Cattle Grazing in the East Kootenay* (July 2008).



Board's recommendation

With appropriate consultation and expert advice, the Ministry of Forests and Range and the Ministry of Environment direct reductions of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

Government's interim response

First, I would like to thank the Forest Practices Board for extending the timeline for the Government to respond to this recommendation. We further appreciate that the intent of the Board's recommendation is to restore and maintain the health and productivity of Crown rangelands in the East Kootenay.

As the Board has acknowledged in its report, implementation of this recommendation will have significant implications for the ranching sector and hunting community in the East Kootenay, and the provincial economy. Accordingly, the MFR and the MoE will be required to move forward in

Page 1 of 2

Dr. Bruce Fraser

a measured, informed and consultative manner before making any decisions that alter forage use levels in this region.

Specific options for how to reach these decisions are being developed in a briefing note that will be presented to the Executives of the MFR and the MoE in the near future. We hope to confirm the decision making process early this fall, and commit to providing periodic updates to the Board as we make progress.

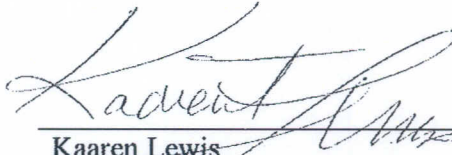
We also commit to providing a full report to the Board on the decisions and action plans that emerge from the process, likely by March 31, 2010.

If the Board has any questions or would like further information regarding Government's actions to address the Board's recommendation, please contact the undersigned directly at (250) 371-3836.

Yours truly,



David Borth
Director, Range Branch
Ministry of Forests and Range



Kaaren Lewis
Director, Ecosystems Branch
Ministry of Environment

pc: Phil Zacharatos, A/ADM, Operations, Ministry of Forests and Range
Ralph Archibald, ADM, Environmental Stewardship Division, Ministry of Environment
Diane Medves, Director, Forest Practices Branch, Ministry of Forests and Range
Andy Witt, Manager, Habitat Management, Ecosystems Branch, Ministry of Environment

File: 97250-20 East Kootenay Crown Range

Complaint 060724 Recommendation Follow-up

In its July 2008 report, *Wildlife and Cattle Grazing in the East Kootenay*, the Board recommended that:

With appropriate consultation and expert advice, the Ministry of Forests and Range and the Ministry of Environment direct reductions of forage use in the East Kootenay to levels sufficient to achieve a positive and continuing trend in grassland ecosystem condition.

The Board asked the two ministries to report jointly, in writing, to the Board by December 31, 2008, about the steps they have taken to give effect to the Board's recommendation. In December 2008, the forests ministry asked the Board for an extension to the deadline because of the complexity of the issue. The Board considered that there was no immediate urgency for a response and granted a three month extension - to March 31, 2009.

In March 2009, the forests ministry told the Board that the ministries were working on a strategy to address and implement the Board's recommendation but that more time was needed to finalize the strategy and obtain executive-level approvals. The Board again considered that there was no imminent environmental or range management concern that required an immediate response. The Board granted a further extension to July 31, 2009, giving the ministry a year to respond.