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

Dear Bruce Fraser:

Ministry of Forests and Range (MFR) staff and I have reviewed the Forest Practices Board (Board) Report *Tree Species Harvested in Areas Affected by Mountain Pine Beetles* and have reflected on the findings, issues raised and recommendations as follows.



I am encouraged that the Board's report concludes that the forest industry is generally meeting the harvest expectations I have set with regard to the profile of tree species being harvested in mountain pine beetle (MPB) areas. This finding is similar to the conclusion reached in the 2007 harvest monitoring project my staff undertook for 16 MPB-impacted timber supply areas. The report concludes that harvesting is more heavily focused in the 60-79 percent pine stands than in the 80-100 percent pine stands. Your report states this may be reason for concern as it is more likely that 60-79 percent pine stands will provide a mid-term harvesting opportunity than the 80-100 percent pine stands. I will consider this finding as I review harvest levels and set harvest profile expectations in MPB-impacted management units.

I also noted two other issues raised in the report. The first issue is that MFR does not have a system to accurately account for depletion of the standing inventory through harvesting. The harvest billing system (HBS), which was designed for revenue purposes, accounts for species and volume scaled and removed from the cutting area. The deficiency with using HBS as a harvest depletion system is that volume harvested but left in the woods is not recorded unless it is considered to be waste of merchantable volume. The second issue raised in the report was regarding the level of spatial resolution available in the HBS. In HBS harvest volumes

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Ministry of Forests
and Range

Forest Analysis and Inventory Branch

Location:
3rd Floor 1520 Blanshard Street
Victoria BC V8W 3C8
CANADA

Mailing Address:
PO Box 9525 Stn Prov Govt
Victoria BC V8W 9C3

Tel: (250) 387-1296
Fax: (250) 953-3687

Bruce Fraser, Ph.D.

are reported at the cutting permit level and therefore reflect an average species profile of the blocks in the cutting permit. This makes it impossible to evaluate the species profile of individual blocks unless the permit pertains to only a single block.

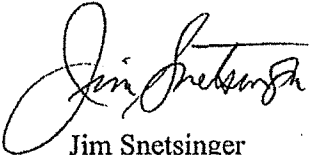
To address these two issues, the Board recommended that MFR develop and implement protocols for monitoring species profile of harvest that will enable district level managers and provincial level policy makers to incorporate appropriately detailed information in their decision making process. The Board also states that this protocol needs to address both the topics examined in this investigation and the issues raised by the investigation.

My staff and I have reviewed the issues raised and the recommendations of the Board and have the following comments and suggestions. I agree that harvest volumes depleted should more fully reflect all timber cut in MPB areas as we move forward. This need to account for harvest depletions more fully requires the harmonization of coarse woody debris standards and regulations, and cut control. The development of coarse woody debris standards currently planned for implementation by September 2009, and the emergence of a bioenergy industry which uses the waste wood should soon take us closer towards a fuller accounting of volume harvested.

With regard to the second issue raised in the report about the level of spatial resolution reflected in the HBS, there is a tradeoff between cost of data collection and level of detail. At the strategic level, staff has advised me that information provided at the cutting permit level is reasonably adequate to monitor harvest profile. Further to this, my recent partitions have set upper limits on the amount of non-pine that can be harvested thus reducing the risk of over-harvesting non-pine stands. If concerns arise for a specific management unit as a result of our harvest monitoring project or from operational observations, an audit of individual cut blocks will be initiated. The HBS should only be viewed as a strategic tool to monitor species profile harvested.

I thank the Board for further highlighting the issue of harvest profile in MPB areas and taking the time to communicate issues and recommendations. Your input is valued and I will continue to reflect on them as I make further decisions in MPB areas.

Yours truly,



Jim Snetsinger
Chief Forester
Ministry of Forests and Range

pc: Murray Stech, Director
Revenue Branch

Albert Nussbaum, Manager
Forest Analysis and Inventory Branch