

Burnt Timber Collaborative Planning Session
April 28th, 2015
Summary of Stakeholder Comments and SLS Response

SLS hosted a collaborative planning session to discuss the planned timber harvest in the Burnt Timber compartment. SLS reviewed the planning hierarchy and government submissions required prior to harvest operations. The group then discussed SLS and stakeholder values in the area, both specific and general.

Three Attendees:

- 2 Public Members – Non-residents, general interest in area
- 1 Public Member – Jamieson Road Resident

Subject: Proposed Harvest Areas as Compared to Spatial Harvest Sequence (SHS) – Jamieson Road Resident

Stakeholder would find it helpful if the printed map provided for discussion included the SHS to compare planned harvest area design with the SHS polygons. It was felt that this would drive discussions to come to a better understanding of the reasons behind harvest area changes, and how SLS manages, reports, and seeks approval when there is a variance from the SHS. It was noted that the Burnt Timber harvest plan that was proposed follows the SHS reasonably closely; however, question remains surrounding changes in harvest areas (location and shape) due to ESRD objectives/directions relating to MPB mitigation and & wildfire protection and errors in the DFMP timber supply analysis (TSA).

SLS Response:

The intent of the printed map is to provide a clear plan of the harvest areas in the Burnt Timber compartment; SHS was left off the map intentionally but can be printed for future sessions. The SHS was provided however, along with other harvest areas design tools digitally on screen. The group then discussed how these tools are linked to harvest area planning and design. Some block-scope planning considerations produce variances between the SHS and the final block design. This is a result of the plan being operationalized, not from conflicting with DFMP objectives and forecasted outcomes. Operational variance is unavoidable but must be effectively managed. Some of the reasons behind this variation include:

- Integration with other stakeholders
- Forest aesthetics
- Historical resources
- Watershed protection
- Habitat management
- Forest Health
- Inoperable and/or inaccessible terrain
- Site-specific forest management decisions

SLS is required to complete variance tables to monitor the operational implementation of plans against the SHS in the Forest Harvest Plan (FHP) submission to ESRD. This variance is acceptable and approved if below 20%, beyond that threshold SLS will provide justification of variance and ESRD will conduct a full

review of the FHP. For more information, please see Section 4.1 Stand Utilization of the 2012 SLS Operating Ground Rules (OGR) available on our website: www.spraylakesawmills.com.

Subject: Mountain Pine Beetle – Jamieson Road Resident

Stakeholder would like more information on SLS's overall MPB strategy and any specific action plans for this compartment.

SLS Response:

ESRD has implemented the 'healthy pine strategy' to reduce the amount of timber susceptible to MPB. This works by identifying the most susceptible stands and amending harvest plans of FMA holders to reduce the amount of susceptible pine by 75% over the next 20 years. Although focusing on high-risk areas, SLS does not follow this strategy. A dramatically increased harvest level is unrealistic in the SLS FMA from social, economic, and environmental standpoints. The implications of an increased harvest level outweigh the benefit of the MPB control in an area with relatively low levels of outbreak compared to other areas in the province. The TSA completed in the DFMP determines a sustainable level of harvest with focus on older, high-risk areas earlier in the sequencing. The harvest activities in the Burnt Timber compartment will follow SLS's MPB strategy.

Subject: Habitat and Wildlife Management

Stakeholder would like more information on the wildlife protection plan for this compartment.

SLS Response:

Forest operations manage the forest cover in a manner that maintains and promotes landscape habitat biodiversity and ecological integrity.

The variability of natural disturbances will be considered when planning harvest area size and shape. This variability will help to provide habitat for species that are dependent on natural disturbance regimes. Harvest strategies include emulating natural disturbance patterns and retaining structural diversity. This natural-state structural diversity provides habitat opportunities for wildlife species that would not otherwise be available.

Habitat suitability index (HSI) was modelled for management of 18 indicator species as part of the DFMP. HSI for all species was maintained across the FMA for all SLS harvest areas.

SLS will follow the strategies laid out in the OGR Section 7.0 Habitat Management in the Burnt Timber compartment. For more information, please reference the Stewardship Report (Biodiversity and Wildlife Habitat Supply) located on our website: www.spraylakesawmills.com.

Subject: Desired Future Forest – Jamieson Road Resident

Stakeholder concern about SLS's objective and targets for the desired future state of the forest. What is SLS's strategy to meet these targets and how are these stands tracked to ensure the targets are met? Stakeholder is aware that SLS subscribes to practices that attempt to emulate natural disturbance to have ecologically sound sustainable forest management, however, there is confusion how this translates

to the desired future state of the forest. How does the SHS predict and provide targets of age-class distribution? Stakeholder asked about surveying 20-80 year old stands to determine if previous and current harvesting and reforestation methods are achieving the intended outcome and if there is any field verification. Concern about increased harvest area due to projected decrease in volume/ha and how that will affect desired future state of the forest. Specific to Burnt Timber, it appears the low-cost volume is being harvested first. Does this affect SLS's ability to manage for an increase in area harvested?

SLS Response:

SLS manages all operations according to DFMP objectives to ensure the desired future forest is realised. SLS predicts this future state in the TSA models and monitors the regenerating stand through a series of surveys and analysis. SLS selects a preferred forest management strategy by running multiple scenarios to evaluate against a number of objectives to reach the desired future state of the forest.

To ensure the regenerating stands reach the desired future state and meet approved regeneration standards, SLS implements a reforestation program, as required by ESRD under the Timber Management Regulation. SLS tracks regenerating stands to ensure harvesting and reforestation methods are achieving the desired outcomes through updating the forest inventory every ten years and surveying regenerating stands.

SLS is committed to following the preferred forest management plan as laid out in the TSA and the spatial harvest levels in the SHS. This plan is based on long-term sustained yield and will be adhered to by ensure sustainable forest management. There is no focus on convenient volume as this is not one of objectives of the TSA models or of SLS.

Please see Chapter 8 – Timber Supply Analysis of the DFMP for more information of the models run, age-class distributions, and the preferred forest management strategy on our website: www.spraylakesawmills.com.

Subject: Old Growth Forest – Jamieson Road Resident

Stakeholder commented that the SHS appears to deliberately avoid old growth conifer. Although not considered a bad thing by the Stakeholder, concerns about how SLS manages old growth with respect to the desired future state of the forest and adherence to the DFMP.

SLS Response:

Old growth forest in the FMA, or the Burnt Timber compartment, are not specifically targeted or avoided through the TSA. The TSA models are prioritized by "Relative Oldest First" which attempts to minimize the loss of volume on a stand by sorting the polygons based on oldest first, and then calculating the volume loss of each fragment for the period. The fragments that are losing higher proportions of volume are sorted higher in the harvest queue. This differs from "Oldest First" harvest priority, whereby Oldest First just assesses the age of the stand and not the volume loss. Generally, current old growth forest levels exceed natural conditions modelled. The old growth target is to move any deficit old forest types to within 25% of mean pre-industrial condition over time.

For more information, please reference the Stewardship Report located on our website:
<http://www.spraylakesawmills.com/woodlands/forest-management-planning/detailed-forest-management-plan/>

Subject: Water and Water Yield – Jamieson Road Resident

Clarification requested regarding the requirement, if any, for providing a re-estimate for increased water yield when harvest areas are adjusted subsequent to approval of a DFMP or harvest. Stream flow results should be verified and compared to predicted values. Stakeholder asked if the government wetland location mapping information was available to view as an overlay on the proposed harvest plan areas. SLS may at some point need to field verify the location and delineate wetlands according to the ESRD classification system to avoid harvesting inside the ESRD official wetland boundary. Does SLS intend to begin a more defined wetland identification and classification verification process? Will this process be applied to the Burnt Timber compartment before the proposed harvest commences?

SLS Response:

Forest regulations require that actual harvest levels are reconciled with the water yield modelled. SHS is used to ensure harvest levels meet or are below modelled thresholds. Regional targets for watershed resource monitoring are found in the South Saskatchewan Regional Plan (SSRP)

SLS does not harvest in wetlands and will follow OGR Section 6.0 Watershed Protection to manage the implications of timber operation on water quality, quantity, and flow. All streams, rivers, lakes, wetlands, and riparian areas are high value resources and receive special management through normal operations.

The government wetland mapping is not available for this area; even if it was it is course data and requires a lot of work to be used as an operational planning tool. SLS relies on updating AVI as well as field verifying these areas. The government wetland mapping may overlap with SLS harvest areas, but this is a function of inaccurate data, not SLS harvesting in wetlands. SLS does not harvest wetlands; all suspect wetland areas are field verified to ensure this.

For more information, please visit the water quality page on our website:
<http://www.spraylakesawmills.com/water/>

Subject: Aesthetics – Jamieson Road Resident

Stakeholder disappointed to see that several proposed cut blocks are adjacent to roads with no buffer provisions citing valuable recreation areas. This practice of often not buffering road lines of sight seems, to be at odds with SLS's DFMP aesthetic value. This practice seems provocative and almost in defiance of the publics expressed desires and interests. Stakeholder noted that meaningful buffers means, in some cases, not harvesting merchantable timber. Are company decisions based on profitability offsetting SLS's good reputation by an amount similar to the generous SLS good will/dollar support that is provided to the local communities? There appears to be provision in the FMA for ESRD to make timber allocation adjustments and/or compensate SLS for such merchantable timber losses as roadway buffers.

SLS Response:

Mitigating timber harvest impacts on visual resources is considered by Spray Lake Sawmills in several ways. The first step was in the development of the current Forest Management Plan (FMP), which integrated aesthetic values overtime throughout the FMA. This was in part accomplished by designating 30% of the total FMA/B9 Quota area as forested retention or *passive land base*. The passive land base is unavailable for harvest and is designed to meet a multitude of important resource values. Another built in component of the FMP, partly designed to enhance aesthetic values, includes the 20-year adjacency constraint and operational harvest sequencing plan. This approach limits the areas available for harvest by maintaining forested areas adjacent to harvested blocks on the landscape overtime.

The Burnt Timber compartment is rated medium in the Visual Sensitivity Assessment. Given the stakeholder concern about visual impacts and the potential for leaving buffers along roadways, SLS will continue to investigate this area with stakeholders to determine a tactic to reduce the impacts of timber harvest and reforestation on visual quality.

SLS's goal as forest managers is to attempt to keep up with the fuel loading by replacing the natural process of wildfire with responsible timber harvesting and reforestation. Leaving a merchantable treed buffer along access roads does not follow this philosophy or the research supporting it and results in a legacy of unhealthy and unproductive forestlands.

For more information on detailed aesthetic value management, please reference the Stewardship Report located on our website: <http://www.spraylakesawmills.com/woodlands/forest-management-planning/detailed-forest-management-plan/>

Subject: Public Involvement Process – Jamieson Road Resident

Stakeholder expressed appreciation for the openness of SLS's planning process – especially meetings such as the BT collaboration session -- and how public has opportunities to provide input into the plan.

SLS Response:

Our promise to stakeholders is to keep them informed, listen to and acknowledge concerns and aspirations and provide feedback on how public input influences decisions. SLS's public involvement policy is to carefully consider feedback and then respond to stakeholders by addressing their concerns. Changes to a plan or operation as a result of public input are recorded by SLS and communicated to the stakeholder.

For more information our public involvement process, please visit our website: <http://www.spraylakesawmills.com/woodlands/public-involvement-process/>

Request: Map requested of all SLS harvest areas in the north FMA going back to the start of SLS operations in the area including harvest date and coordinates of each block.

SLS Response: SLS will not be able to provide this information.

Additional Comments made by Nature Alberta representative on April 30, 2015:

Subject: Access Control

Stakeholder concerns about impact of OHV on watercourses in the Burnt Timber compartment, how SLS will work with ESRD to limit access to non-designated use areas.

SLS Response:

Wildlife, sensitive areas, protection of road quality, and safety are reasons for implementing access control. A number of strategies and tactics are available for controlling or restricting access:

- Physical barriers (gates, barricades, piling, crossing removal)
- Road conditions (berms, ditches, road stands, selective grade removal, roll-back, no snow removal)
- Regulatory (sanctuaries, timing restrictions, signage)

SLS does not have the right to restrict access, but works with ESRD to control access to these areas, which are jointly monitored. This applies to non-designated trails as well. SLS will reclaim all blocks, roads, and crossings following harvest operations.

Request: Concerning the road gradient and potential sedimentation into Margaret Creek on 2433A road; can SLS look into this crossing and the value of the block?

SLS Response: SLS will investigate type of crossing required to cross Margaret Creek and potential for soil erosion and sedimentation as per the OGR.

Additional SLS comments

Supplemental to the OGR, SLS developed a series of resource management objectives designed to measure performance in meeting the stated goals identified in the DFMP. Some of the plan metrics include water quality, road access and reclamation, reforestation program, biodiversity and wildlife habitat supply, soil disturbance, and sustainable timber supply. SLS has consistently met or exceeded all of the stated plan objectives. Please see the SLS Stewardship Report, which summarizes the annual and five-year monitoring deliverables in reference to the planning objectives identified in the DFMP at <http://www.spraylakesawmills.com/woodlands/forest-management-planning/detailed-forest-management-plan/>

SLS would like to thank all those who participated in this year's planning sessions and all of our public consultation; your interest and comments are greatly appreciated.