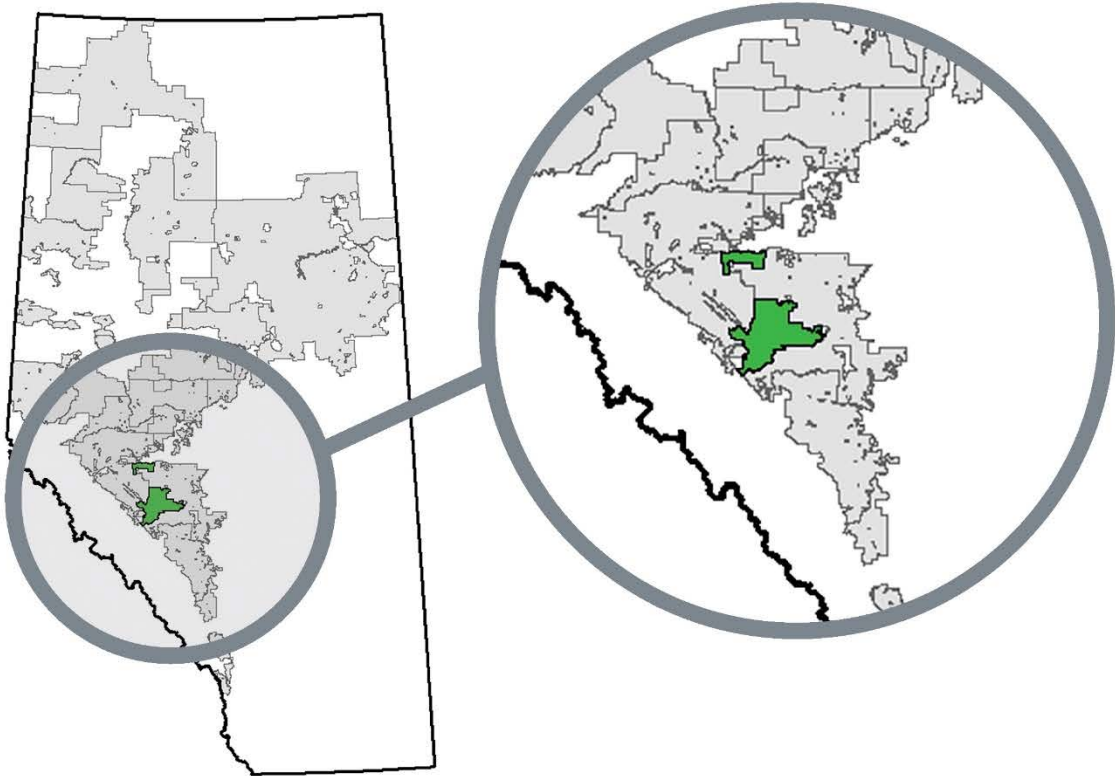


# Forest Management Plan Approval Decision

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## Forest Management Unit R13

West Fraser Mills Ltd. (Edson)



Forest Management Agreement 9700032

Alberta Agriculture and Forestry  
May 12 2020  
Edson Forest Products 2018 Forest Management Plan Approval Decision

# Forest Management Plan Approval Decision

Forest Management Unit R13

West Fraser Mills Ltd. (Edson)

**Forest Management Agreement 9700032**

**Date:** May 12, 2020

**Annual Allowable Cut**

**Effective Date:** May 1, 2018

**Approved by:** Original Signed

Daniel Lux, Executive Director

Forest Stewardship and Trade

## Introduction

This Forest Management Plan (FMP) is prepared to meet Forest Management General Provision 10 (1) of the West Fraser Mills Ltd. (EFP) Forest Management Agreement (FMA) dated January 14, 2008. Acceptable FMPs are approved by the Executive Director, Forest Stewardship and Trade Branch (FSTB), Alberta Agriculture and Forestry (the department). This Approval Decision presents the rationale and establishes conditions of approval for the EFP 2018 FMP dated October 2, 2019.

The conditions herein are consistent with the terms of the FMA and failure by EFP to fulfill the direction provided in this Approval Decision may place the company in default of its FMA. The conditions contained herein are non-negotiable.

The EFP 2018 FMP has been validated by a Regulated Forestry Professional (RFP). The department recognizes RFP validated work as complete, accurate, and prepared with professional due diligence.

## Forest Management Planning Area

The forest management planning area under consideration is FMA 9700032. The FMP includes the FMA and non-FMA portions of Forest Management Unit (FMU) R13, collectively known as the Defined Forest Area (DFA).

The DFA is located within the Upper Athabasca, and North Saskatchewan Land-Use Framework planning regions in west central Alberta; it falls within the Subalpine, Upper Foothills, and Lower Foothills Natural Subregions.

Where strategic land use and integrated resource management plans are approved after a FMP has been approved, the department and EFP shall discuss implementation of the strategic land use and integrated resource management plan and the department may require the EFP 2018 FMP to be amended.

## Background

The previous FMP for the FMA was approved September 17, 2009. The EFP 2018 FMP is prepared according to the Alberta Forest Management Planning Standard, version 4.1, 2006 (AFMPS) and replaces the previous FMP. The 2018 EFP FMP introduces new information for planning, implementing and monitoring forestry operations on the DFA. This Approval Decision represents the culmination of the department's appraisal process. It should be noted, any errors or omissions within the Forest Management Plan are the sole responsibility of the FMA holder.

This FMP was due on April 30, 2017 as indicated in the September 17, 2009 Approval Decision. Additional time was required for the development of this plan as identified in section 2.3 of the FMP, which led to the delayed FMP submission in October 2019.

The publication of this Approval Decision concludes the department's appraisal of the EFP 2018 FMP. The department posts approved FMP's on its website to support public access to plans. EFP remains obligated to make the approved FMP available to the public.

## Approval Decision Scope

This Approval Decision addresses the EFP 2018 FMP. It replaces previous FMPs, timber supply analyses and their associated approval conditions.

All tenure holders within the DFA shall conduct their activities in accordance with the approved EFP 2018 FMP, this Approval Decision, and associated conditions.

EFP shall meet the requirements of the EFP 2018 FMP approval conditions unless the Executive Director, Forest Stewardship and Trade Branch (FSTB), agrees to alternate requirements in writing.

In this document, **bolded text** identifies specific timelines, requirements, and the department senior manager accountable for the review. Non-bolded text presents the rationale for the condition and specific considerations to be addressed to meet the condition.

In the event of an inconsistency between the EFP 2018 FMP, this Approval Decision, and any existing, new or revised policy or legislation, the policy or legislation shall apply.

## Timber Supply Analysis

The department approves the tree length Annual Allowable Cut (AAC) from the Timber Supply Analysis (TSA) Preferred Forest Management Scenario (PFMS) EFP\_213 (Appendix 25, table 10, and table 11), of the EFP 2018 FMP. EFP requested, and was approved by the department to undertake an accelerated harvest of 125%, the maximum allowed for in the standard. The request for the accelerated harvest was primarily made to provide an opportunity for the company to reduce areas within their DFA that are susceptible to MPB.

## Approved Annual Allowable Cuts

**The Approved AACs for May 1, 2018– April 30, 2027 are:**

- Coniferous AAC: 574,900 m<sup>3</sup> per year
- Deciduous AAC: 54,600 m<sup>3</sup> per year

Refer to Tables 1 and 5 for the Historical Allocations, Tables 2 and 6 for the Approved AACs.

## The Approved AACs effective May 1, 2027 are:

- Coniferous AAC: 424,000 m<sup>3</sup> per year
- Deciduous AAC: 48,700 m<sup>3</sup> per year

## Approved Tree Length Utilization

- Coniferous: 15/11/15 cm
- Deciduous: 15/10/15 cm

## Authorization

The EFP 2018 FMP is approved subject to the approval conditions and AACs (Tables 2 and 6) presented in this Approval Decision.

The AACs are effective beginning May 1, 2018. The AACs are predicated on all tenure holders harvesting the species profile identified in the spatial harvest sequence (SHS), within variance tolerances, and by implementing the silviculture prescriptions and other activities as presented in the FMP.

The SHS is effective beginning May 1, 2018. The SHS (EFP\_SHS\_V4) provided for the PFMS (EFP\_213) is approved with this Approval Decision.

In following with the Forest Management Agreement section 10(1), the next FMP is due on or before April 1, 2027.

## Forest Management Plan Approval Conditions

The Approval Conditions direct EFP to complete additional work to enhance the information presented.

Approval Condition	Page	Requirement	Approval Authority	Date
1.1 i	6	Public Consultation	Forest Area Manager, Edson Forest Area	Ongoing
1.2 i	6	Indigenous Consultation	Forest Area Manager, Edson Forest Area	Ongoing
2.1 ii	6	Forest Health	Director, Forest Resource Management	November 1, 2023 April 1, 2027
3.1 i-ix	7,8	Spatial Harvest Sequence	Forest Area Manager, Edson Forest Area & Director, Forest Resource Management	Ongoing
4.1 i, ii	8	Stand Level Structure Retention	Director, Forest Resource Management	November 1, 2023 April 1, 2027
5.1 i	8	Habitat for Species of Concern	Director, Forest Resource Management	Ongoing

## Forest Management Plan Approval Conditions (Cont'd)

Approval Condition	Page	Requirement	Approval Authority	Date
6.1 i	9	Growth and Yield	Director, Forest Resource Analysis	September 30, 2020
7.1 i	9	Access	Director, Forest Resource Management	Ongoing
9.1 i, ii	10	Performance Monitoring and Reporting	Director, Forest Resource Management	November 1, 2023 April 1, 2027
10.1 i	11	Future Forest Management Plan	Executive Director, Forest Stewardship and Trade Branch	April 1, 2027



## 1.0 Public and Indigenous Consultation

The Government of Alberta delegates the responsibility for public involvement and Indigenous consultation on proposed FMPs to the FMA holder through Alberta's Indigenous Consultation policies and guidelines.

EFP's Indigenous consultation has been deemed adequate, and in alignment with current Government of Alberta policies. EFP engaged in reasonable, and ongoing public and interest group involvement, and addressed the issues raised to the extent possible within the scope of the FMP. EFP must maintain its efforts to conduct meaningful public and interest group involvement as well as Indigenous consultation throughout FMP implementation.

### Approval Condition 1.1 Public Involvement

- i. EFP shall keep written documentation of the issues and comments raised by the public during operational plan consultation, as well as responses and actions to address the concerns. This shall be made available to the Government of Alberta (GoA) upon request.**

### Approval Condition 1.2 Indigenous Consultation

- i. All tenure holders shall adhere to the provincial policies and guidelines for Indigenous consultation.**

## 2.0 Mountain Pine Beetle

With this plan, EFP will continue to focus its harvesting operations in stands with elevated risk to MPB. An accelerated harvest will be employed in an effort to reduce the amount of susceptible pine on the landbase. EFP will focus 60% of the first decade's harvest within MPB risk Rank 1 and Rank 2 stands. Consistent implementation of the plan and adherence to the approved spatial harvest sequence will be important in accomplishing these goals.

### Approval Condition 2.1 Mountain Pine Beetle

- i. All tenure holders shall discuss priorities and coordinate efforts for forest renewal activities as well as MPB control and timber salvage as per the Mountain Pine Beetle Level 2 Harvest Priorities and Approval Process Directive 2013-01 with the Forest Area Manager, Edson Forest Area.**
- ii. In the 5, and 10 year Stewardship Reports, EFP shall report on the performance of the mountain pine beetle risk reduction strategies by summarizing as a minimum:**
  - a. Total area (ha) harvested by MPB risk ranking**
  - b. Total area (ha) of additions, deletions, and deferrals by MPB risk ranking**
  - c. Total area (ha) reduction by MPB risk ranking over time on the FMA**

## 3.0 Spatial Harvest Sequence

The SHS is the most important output of the FMP as it provides the implementation strategy all tenure holders must follow to achieve the forecasted future forest conditions. While dependent on many factors, future forest conditions are strongly influenced by harvest patterns, intensity and schedules. It presents spatially and temporally how the integration of environmental, economic, and social values will be achieved on the DFA. Adherence to a properly planned SHS is imperative; it will be monitored by both EFP and the department.

Proposed SHS variances which are in contradiction to the FMP's main management goals should have sound justification, and the requirement for such a change should be carefully reviewed by EFP and the department.

### Approval Condition 3.1 Spatial Harvest Sequence

- i. All tenure holders shall follow the approved SHS developed to meet this approval condition.
- ii. All tenure holders may modify the approved SHS by deleting and replacing stands from the contributing landbase provided that:
  - a. Additions include no more than 20% of the total SHS area in each compartment per decade, and Base 10 yield strata.
  - b. Harvesting does not exceed 100% of the total area within the approved SHS by compartment per decade, and Base 10 yield strata.
  - c. All tenure holders shall not have more additions than combined area in deletions and deferrals. Preference shall be given to the second decade for additions.
- iii. Stands may be added from the non-contributing landbase subject to department approval.
- iv. Stands with MPB shall follow the Mountain Pine Beetle Level 2 Harvest Priorities and Approval Process Directive 2013-01.
- v. All tenure holders shall track variance by compartment per decade and Base 10 yield strata using additions and Strata Description Tables, according to the Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting Requirements.
- vi. Should tenure holders exceed the thresholds described in (ii), the Forest Area Manager, Edson Forest Area, may require the completion of a Compartment Assessment and the Director, Forest Resource Management, may recommend the reduction of the approved AAC to reflect the impact of the variance.
- vii. Repeated deferral of any SHS stand is unacceptable. All deferrals from this FMP shall be harvested within the SHS period of the 2027 FMP or marked as deletions and removed from the contributing landbase.

- viii. The department requires the variance from the approved SHS to be reported annually. The five-year Stewardship Report (Approval Condition 9.1) shall include an analysis of the variance from the approved SHS (Approval Condition 3.1) and describe the impacts of the variance on forecasts made in the FMP.
- ix. The department may request a modification to the approved SHS if required by a change in legislation or policy.

## 4.0 Stand Level Structure Retention

Structure retention is one of two indicators supporting objective 1.1.2.1 in Annex 4 of the AFMPS. Structure retention is a stand level indicator that contributes to conserving biological diversity across the landscape, and specifically aims to maintain portions of intact forest within harvested openings.

### Approval Condition 4.1 Stand Level Structure Retention

- i. All tenure holders shall follow the Structure Retention Strategy identified in the FMP. Structure retention targets shall be reported in the Stewardship Reports.
- ii. In the Stewardship reporting a distinction shall be made as to what portion of the target was achieved from the passive landbase.
- iii. Structure retention volumes shall be reported to the area forestry offices annually by calendar year end, following timber year end.

## 5.0 Habitat for Species of Concern

The maintenance of habitat for identified high value species is a fundamental objective of Forest Management Planning within Alberta. EFP has a demonstrated history of involvement in regional cooperative work to reduce the impacts of forestry operations for wildlife on the DFA. EFP's continued engagement with other forest users, and observance of new and existing land use policy will ensure the broad goals for wildlife and wildlife habitat are met.

### Approval Condition 5.1 Habitat for Species of Concern

- i. All tenure holders shall comply with GOA guidelines, direction, recovery, conservation and/or implementation plans regarding sensitive species.
- ii. EFP shall adapt the FMP to be in alignment with Land Use Framework Regional Plans approved under the Alberta Land Stewardship Act within one year of their release.

## 6.0 Growth and Yield

A credible and comprehensive Growth and Yield Program gathers key information for use in future timber supply analyses, and is used to monitor current FMP timber growth and yield assumptions.

A sensitivity run for the timber supply analysis was completed by EFP to identify the reliance of the current harvest levels on improved yields attributed to managed stands and the deployment of improved seed. The sensitivity run indicated there is a 32% benefit to the coniferous volume, and a 36% benefit to the deciduous volume tied to the realization of these silviculture gains. EFP is encouraged to continue monitoring crop trees past the 14 year performance survey, and to work to ensure the expected outcomes are realized in the field.

## **Approval Condition 6.1 Growth and Yield**

- i. EFP shall develop and submit to the department a measurement schedule to update the Growth and Yield Monitoring Program. This must be submitted on or before September 30, 2020, and satisfactory to the Director, Forest Resource Analysis.**
- ii. EFP shall implement and meet commitments in the Growth and Yield Program. Stewardship reporting (Approval Condition 9.1) shall provide an update on the progress of meeting the commitments.**

## **7.0 Access**

The FMA grants the holder the right to create access necessary to harvesting operations on the forest management area. Applications to establish any new permanent access must first be made to Alberta Environment and Parks, and will be subject to a separate review process. The representation of proposed permanent access within this FMP is not to be construed as approved by means of this approval decision.

Requirements specific to each road application will be discussed and reviewed on a case by case basis to minimize the potential impacts to the forest management area. EFP road construction and related stream crossing construction will follow all the rules and guidelines contained within the OGRs as they relate to non-department License of Occupation (DLO) roads. Alignment with Regional Integrated Land Management Plans and their specific requirements is required.

## **Approval Condition 7.1**

- i. All tenure holders will follow OGR, and disposition conditions for the establishment, maintenance, and reclamation of forestry access in the DFA.**

## 8.0 Timber Harvest Planning and Operating Ground Rules

EFP makes a number of commitments and proposes strategies for mitigating risks within the FMP. The Timber Harvest Planning and Operating Ground Rules shall be in alignment with the FMP.

## 9.0 Performance Monitoring and Reporting

Five-year Stewardship Reports monitor implementation of FMPs.

### Approval Condition 9.1 Performance Monitoring and Reporting

- i. EFP shall prepare five-year Stewardship Reports that document the operational performance of each tenure holder's activities implementing the FMP. All tenure holders shall cooperate in providing supporting information to EFP. Where deviations from the planned outcomes exist, analyses shall discuss the reasons for the deviations and describe each tenure holder's corrective action, taken or proposed. Stewardship Reports shall follow the Forest Management Planning Standard Interpretive Bulletin: Stewardship Reporting Requirements. Stewardship Reports shall be acceptable to the Director, Forest Resource Management.**
- ii. By November 1, 2023 EFP shall submit a Stewardship Report, covering the period from May 1, 2018 to April 30, 2023.**
- iii. With the April 1, 2027 FMP, EFP shall submit a Stewardship Report, covering activities post May 1, 2023 and should be a component of the next FMP.**

## 10.0 Future Forest Management Plan

In accordance with the FMA 9700032 section 10 (1), the next FMP is due April 1, 2027 unless otherwise approved by the Minister. The effective approval date of the AAC and SHS covered by this Approval Decision is May 1, 2018.

### Approval Condition 10.1 Future Forest Management Plan

- i. By April 1, 2027 EFP shall submit a new FMP for department review that meets the requirements of the Alberta Forest Management Planning Standard, unless otherwise approved by the Minister.**

**Table 1. Historical Coniferous Allocations and Annual Allowable Cuts**

FMU	Company Name	Disposition Number	Landbase Management Type	Source	Cover Group / Species	Primary Disposition Allocation (%)	Primary Coniferous AAC (m <sup>3</sup> ) 15/11/15 cm	Total Approved AAC (m <sup>3</sup> )
R13	West Fraser Mills Ltd.	FMA9700032	Single Combined	All-FMU	C, CD, DC, D		408,983	408,983
R13		Local Use	Single Combined	All-FMU	C, CD, DC, D		2,055	2,055
R13	FMA AAC Subtotal	FMA9700032	Single Combined	All-FMU	C, CD, DC, D		411,038	411,038
R13	Precision Forest Industries Ltd.	CTQR130001	Single Combined	All-FMU	C, CD, DC, D	0.4600%	1,926	1,926
R13	Tall Pine Timber Co. Ltd.	CTQR130003	Single Combined	All-FMU	C, CD, DC, D	0.1600%	670	670
R13	CTPP	CTPP	Single Combined	All-FMU	C, CD, DC, D		5,066	5,066
<b>FMU R13 Total</b>							<b>418,700</b>	<b>418,700</b>

Notes:

Effective May 1, 2009

CTPP volume as per FMA document 8(2)(a).

Local use volume is included in the West Fraser Mills Ltd. FMA volume as per FMA document 8(2)(c).

## Table 2. Approved Coniferous Allocations and Annual Allowable Cuts

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	Landbase Management Type	Source	Cover Group / Species	Primary Disposition Allocation (%)	Primary Coniferous AAC (m <sup>3</sup> ) 15/11/15 cm	Total Approved AAC (m <sup>3</sup> )
R13	West Fraser Mills Ltd.	FMA9700032	Single Combined	All-FMU	C, CD, DC, D		561,558	561,558
R13		Local Use	Single Combined	All-FMU	C, CD, DC, D		2,822	2,822
R13	FMA AAC Subtotal	FMA9700032	Single Combined	All-FMU	C, CD, DC, D		564,380	564,380
R13	Precision Forest Industries Ltd.	CTQR130001	Single Combined	All-FMU	C, CD, DC, D	0.4600%	2,645	2,645
R13	Tall Pine Timber Co. Ltd.	CTQR130003	Single Combined	All-FMU	C, CD, DC, D	0.1600%	920	920
R13	CTPP	CTPP	Single Combined	All-FMU	C, CD, DC, D		6,955	6,955
<b>FMU R13 Total</b>							<b>574,900</b>	<b>574,900</b>

Notes:

CTPP volume as per FMA document 8(2)(a).

Local use volume is included in the West Fraser Mills Ltd. FMA volume as per FMA document 8(2)(c).

**Table 3. West Fraser Mills Ltd. (Edson) FMA Coniferous Chargeability**

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	Coniferous Species Used in AAC	Species NOT Chargeable to AAC	Rights to Species NOT Chargeable to AAC	Structure Retention (%)	Structure Retention (%) Accounted for in AAC	Net Landbase Deletions and Deferrals	Net Landbase Deletions and Deferrals: Rights to Timber	Industrial Salvage Chargeability Strategy
All dispositions and FMUs (unless otherwise noted)			Fb, Pl, Sw, Sb	n/a	n/a	3	Structure Retention is AAC chargeable	Deletions identified within Appendix 23, Section 2.7	West Fraser Mills Ltd. FMA	All industrial salvage volumes are AAC chargeable

**Table 4. West Fraser Mills Ltd. (Edson) FMA Coniferous Utilization**

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	AAC Type	Cover Group / Species	Utilization used to determine Harvest Level in PFMS				Operational Utilization				
					Top Diameter (cm)	Stump Diameter (cm)	Minimum Length (m)	Stump Height (cm)	Top Diameter (cm)	Stump Diameter (cm)	Minimum Length (m)	Stump Height (cm)	Coniferous Harvest Level (m <sup>3</sup> /yr) based on Operational Utilization
All dispositions, FMUs and AAC types (unless otherwise noted)			All	C, CD, DC, D	11	15	3.84	15	n/a	n/a	n/a	n/a	n/a



**Table 5. Historical Deciduous Allocations and Annual Allowable Cuts**

FMU	Company Name	Disposition Number	Landbase Management Type	Source	Cover Group / Species	Primary Deciduous AAC (m <sup>3</sup> ) 15/10/15 cm	Total Approved AAC (m <sup>3</sup> )
R13	West Fraser Mills Ltd.	FMA9700032	Single Combined	All-FMU	C, CD, DC, D	52,626	52,626
R13		Local Use	Single Combined	All-FMU	C, CD, DC, D	264	264
R13	FMA AAC Subtotal	FMA9700032	Single Combined	All-FMU	C, CD, DC, D	52,890	52,890
R13	CTPP	CTPP	Single Combined	All-FMU	C, CD, DC, D	7,110	7,110
<b>FMU R13 Total</b>						<b>60,000</b>	<b>60,000</b>

Notes:

Effective May 1, 2009

Local use volume is included in the West Fraser Mills Ltd. FMA volume as per FMA document 8(2)(c).

## Table 6. Approved Deciduous Allocations and Annual Allowable Cuts

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	Landbase Management Type	Source	Cover Group / Species	Primary Deciduous AAC (m <sup>3</sup> ) 15/10/15 cm	Total Approved AAC (m <sup>3</sup> )
R13	West Fraser Mills Ltd.	FMA9700032	Single Combined	All-FMU	C, CD, DC, D	47,889	47,889
R13		Local Use	Single Combined	All-FMU	C, CD, DC, D	241	241
R13	FMA AAC Subtotal	FMA9700032	Single Combined	All-FMU	C, CD, DC, D	48,130	48,130
R13	CTPP	CTPP	Single Combined	All-FMU	C, CD, DC, D	6,470	6,470
<b>FMU R13 Total</b>						<b>54,600</b>	<b>54,600</b>

Notes:

Local use volume is included in the West Fraser Mills Ltd. FMA volume as per FMA document 8(2)(c).

**Table 7. West Fraser Mills Ltd. (Edson) FMA Deciduous Chargeability**

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	Deciduous Species Used in AAC	Species NOT Chargeable to AAC	Rights to Species NOT Chargeable to AAC	Structure Retention (%)	Structure Retention (%) Accounted for in AAC	Net Landbase Deletions and Deferrals	Net Landbase Deletions and Deferrals: Rights to Timber	Industrial Salvage Chargeability Strategy
All dispositions and FMUs (unless otherwise noted)			Aw, Bw, Pb	n/a	n/a	3	Structure retention is AAC chargeable.	Deletions identified within Appendix 23, Section 2.7	West Fraser Mills Ltd. FMA	All industrial salvage volume are AAC chargeable.

**Table 8. West Fraser Mills Ltd. (Edson) FMA Deciduous Utilization**

Effective Date: May 1, 2018

FMU	Company Name	Disposition Number	AAC Type	Cover Group / Species	Utilization used to determine Harvest Level in PFMS				Operational Utilization				
					Top Diameter (cm)	Stump Diameter (cm)	Minimum Length (m)	Stump Height (cm)	Top Diameter (cm)	Stump Diameter (cm)	Minimum Length (m)	Stump Height (cm)	Deciduous Harvest Level (m <sup>3</sup> /yr) based on Operational Utilization
All dispositions, FMUs And AAC Types (unless otherwise noted)			All	C, CD, DC, D	10	15	2.49	15	n/a	n/a	n/a	n/a	n/a

**Table 9. Fiber Transfer Agreements within the West Fraser Mills Ltd. (Edson) FMA Area**

Source Company	Source Disposition Number	Transfer Type	Company Directed To	Species Group	Volume (m <sup>3</sup> /yr)	Comments
West Fraser Mills Ltd.	FMA9700032	FMA	Weyerhaeuser Company Limited	Deciduous	43,500	FMA clause 19 (1)