



West Fraser

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FSP 351 Amendment 3 rationale

3.11 Objectives set for Visual Quality

The original **Agreement Holders'** result and strategy were the requirements under FPPR 1.1. The recent extent of wildfire within Scenic Areas require an alternative strategy to effectively salvage damaged timber within these areas due to the large nature of fire disturbance within the scenic areas. While fire impacted stands are the primary target of this alternative strategy, it would apply to any **damaged stand** where there is at least 70% fire damage codes A, B, C, or blowdown codes E or G stems, described in the Cruising Manual or dead trees for stems 12.5cm dbh and greater, extensively distributed throughout the stand.

The Scenic Areas were made known for the Lakes TSA and the boundaries are the same as the visual polygons in the spatial file known as *Visual Landscape Inventory* obtained from BC data distribution services. The results are based on the visual quality objectives attributed to the scenic area in affect at the time of cutting permit approval.

In order to address the salvage of extensive areas within scenic areas, the amendment proposes removing the references to scale and visual acuity in the result and strategy specific to **Damaged Stands** salvage stands. Scale is the "large, small, % alteration" while the visual acuity is the "very easy to see, hard to see, etc" aspect. The references to natural in appearance, not rectilinear or geometric in shape remain the same for each of the Visual Quality Objectives.

As an example, for a partial retention VQO in a salvage stand, the opening would be natural and not rectilinear or geometric in shape. There is a caveat to this result to address damage up against plantations, fire guards and constructed roads. An example is a greened up cutblock with angular boundaries that escaped damage but the surrounding natural stand was killed in its entirety. An abrupt line between the edge of the green plantation and the damaged stand could be an angular feature that would be hard to manage visually unless the plantation itself had been impacted to result in an irregular boundary between planation and adjacent damaged stand.

This amendment is being proposed as an alternative to a FPPR Sec 12(7) exemption. The 12(7) exemption is granted where the minister determines that it is not practicable to specify a result and strategy for an established objective. Past exemptions in scenic areas by West Fraser within the neighboring Stuart Nechako District have required the request submission following investment in development and were for salvage of MPB volumes. In the case of fire damage, the deterioration of the timber makes waiting for an exemption that may or may not be forthcoming an impediment to salvage. In the case of the proposed alternative result and strategy for salvage of damaged stands , the Agreement Holders has the certainty in pursuing extensive salvage as long as the stand damage criteria is met and the province would have the certainty that highly damaged stands are being addressed, future fuel hazards that increase risk to the landscape are reduced, while maintaining visual aspects on the scenic area.

Should the salvage of damaged timber outweigh the visual quality objectives? Retention of large areas of damaged timber across the landscape does little for the landscape view, other than provide to a viewer an alteration that was not caused by harvesting. In return, a large fuel loading of dead timber has been left on the area waiting for a fire event to naturally finish cleaning up the area while endangering previously unburned areas or possibly private property. The 2024 example of reburns in the South Ootsa provide evidence of this risk. This result and strategy means to balance the impact to scenic areas with the objective of salvaging **damaged stands**.

The following is an assessment of the considerations taken in drafting this result and strategy:

2. For scenic areas as identified on Maps 2 and 3 within the **Lakes North** and **Lakes south FDUs**, with a visual quality objective other than Preservation, where the salvage of **damaged stands** is more than the established visual objective can accommodate, the **Agreement Holders** will:

a) *carry out timber harvesting and road construction such that the alteration resulting from these activities when viewed from a significant public viewpoint, will:*

i) *retain **Un-Damaged stands** where practicable.*

- Targeting stands classed as **damaged** and avoiding **un-damaged stands** will maintain live trees in the area. With the availability of satellite imagery supplemented by cruise and recce information, the **Agreement Holders** can avoid these areas at the 1ha size level in most cases. To go to a smaller size would increase the amount of field work and exposure to dead trees associated tree strikes for field workers although smaller areas may be retained opportunistically.
- The cruise data for a block will provide the information on extent of damage.
- The term practicable is meant to provide some flexibility in case a road is required to go through an undamaged stand.

ii) *appear natural and not as rectilinear or geometric in shape;*

- Natural disturbance rarely results in straight lines so following the damaged timber edge and maintaining **un-damaged stands** is expected to result in a natural and not rectilinear or geometric shape in most cases.
- Instances where this may not occur could be along plantations where there could be an abrupt change from green trees to burned/damaged, severe blowdown, an area where use of fireguards or wind driven fire behavior or blowdown resulted in a rectilinear line of damage. We are proposing the harvest of a **damaged stand** would remove the damaged timber without regard for rectilinear or geometric shapes in the following conditions:

(i) to the boundary of plantations,

(ii) to the boundary of un-damaged stands,

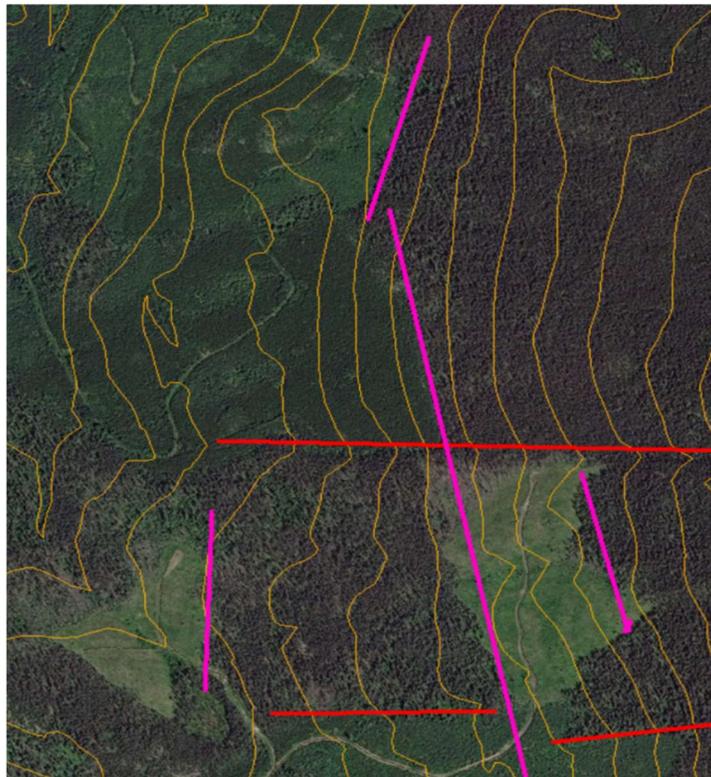
(iii) riparian features,

(iv) to fireguards,

(v) to existing constructed roads

These instances could display as rectilinear in this area depending on orientation to the viewpoint, but for larger openings the overall shape would still not be entirely geometric (square, triangular, etc), as the assessment of lines of force would help ensure the remainder of the block is fitting more into the terrain. With smaller openings bounded by plantations, there may be a geometric feature created however.

Figure 1. Example image of plantations exhibiting rectilinear edges that could affect the naturalness achieved in the salvage of damaged stands.



iii) *respond to the major lines of force present within the terrain the development occurs;*

- The lines of force concept is based on the assessment of landscape character and then using this information to fit the development into the landscape. A positive or complementary response to major lines of force in a landscape with a terrain of rounded ridgelines would require blocks to have a similar shape on their visible boundary edges as an example. This would also apply to the visible edges of larger interior reserves within the cutblock. The Visual Landscape Design Training Manual goes into greater depth on the subject and is used by those completing the assessments. The Agreement Holders can plan development that responds to the major lines of force except in the case described above in 2(a)(i).

b) *If the scenic area containing **damaged stands** being salvaged encompasses existing plantations, non-**damaged stands**, riparian features, fireguards, or constructed roads, 2(a)(ii & iii) will not apply for the portions where harvest of **damaged stands** extends to the boundaries of these features but will apply for the remainder of the area.*

- This provides a description where salvage of damaged stands may not achieve naturalness in response to existing conditions in the scenic area. We foresee that boundaries against plantations will cause issues, however the retention of un-damaged stands throughout larger openings will ameliorate this impact.

Signature of Preparing Forester:



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