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RE: FSP 651 Amendment 3: Change to definition of Partial Cut System rationale

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West Fraser Mills Ltd. is amending the definition of what a Partial Cut System is within the Sec. 1.1 Definitions section of the Forest Stewardship Plan (FSP).

The current definition used in the FSP is as follows:

**“Partial Cut System”** means harvest where

- i. the basal area to be removed from the area to be harvested is  $\leq 40\%$  of the total pre-harvest basal area of conifer; and
- ii. the live conifer basal area to be removed from the area to be harvested is  $< 30\%$  of the pre-harvest basal area; and
- iii. the harvest is evenly distributed across the pre-harvest diameter class, or the harvesting is a thinning from below treatment that removes only intermediate and overtopped crown classes.

West Fraser is amending the definition to the following:

**“Partial Cut System”** means harvest where

- i. the basal area to be removed from the area to be harvested is  $\leq 40\%$  of the total pre-harvest basal area of live conifer; and
- ii. the harvest is evenly distributed across the live conifer pre-harvest diameter class, or the harvesting is a thinning from below treatment that removes only intermediate and overtopped crown classes.

The revised definition allows for increased removal of dead standing and down trees while still maintaining at least 60% of the live pre-harvest basal area. In the Lakes Timber Supply Area, stands frequently contain  $> 30\%$  dead volume due to historic mountain pine beetle mortality and ongoing balsam bark beetle damage. Retaining this level of dead material increases the potential for high-intensity wildfire, which may threaten the remaining healthy forest. This dead material may be present in small patches or distributed uniformly across the stand.

Partial cutting systems are designed to thin from below by removing dead, damaged, and suppressed stems, thereby promoting a healthier residual stand. Live trees retained under this regime are more likely to persist and contribute to future harvest opportunities and forest cover than suppressed or damaged stems.

Although the revised definition enables greater removal of dead trees, operational constraints of partial harvesting naturally limit the extent of removal of both live and dead stems. Most deadwood extraction will occur along machine trails and within approximately 7 m of trail edges.

Research supports the ecological soundness of this approach. Studies indicate that partial cutting levels in the range of 30–60% have limited impacts on stand structure, including the distribution of diameter classes and the retention of coarse woody debris, which provides important wildlife habitat (Stevenson & Keisker, 2002). Small mammal studies in partially harvested forests show that species such as the Southern red-backed vole respond positively to partial retention systems compared to clearcuts (Constaninou, Burton, Simard & Hodder, 2025; Monthey & Soutiere, 1985; Steventon, MacKenzie & Mahon, 1998). Because this species is considered an indicator of old-growth conditions, its positive response suggests that partial cutting can maintain or enhance ecological integrity.

By retaining  $\geq 60\%$  of live stems, the revised definition is consistent with the conditions evaluated in these ecological studies and supports forest health objectives while also reducing wildfire risk.



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