

Pest Management Plan

BCTS-MK-PMP 14/18

**BC Timber Sales – Prince George Business Area
Forest Vegetation Management within the
Mackenzie Timber Supply Area**

January 1, 2014 – December 31, 2018

November 2013

EXECUTIVE SUMMARY

The BC Timber Sales (BCTS) Prince George Business Area submits the following integrated Pest Management Plan (PMP) for the management of competing vegetation for the period of January 1st, 2014 to December 31st, 2018.

This plan applies to specific areas in the Mackenzie Timber Supply Area (TSA). For all blocks harvested under Timber Sale Licences (TSL's), BCTS is obligated, through legislation, to achieve free growing status within the time frame specified in the Silviculture Prescription or Site Plan (SP). BCTS carries out vegetation management activities in meeting these legal obligations.

Additionally, BCTS holds road maintenance obligations on some Forest Service Roads. These responsibilities include safety and environmental aspects including maintaining rural residence access, high value recreation site access, roadside and road prism water flow and drainage to minimize negative impacts on road integrity, and sight lines to enhance safety. Herbicide may be used as a road maintenance tool to manage vegetation on roadsides to satisfy this requirement.

All Integrated Pest Management activities conducted under this PMP will comply with all applicable legislation, including (but is not limited to) the *Integrated Pest Management Act* and Regulations, *Forest and Range Practices Act* (FRPA) and the *Forest Planning and Practices Regulation* (FPPR).

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1.0 INTRODUCTION

1.1 Purpose

The mandate of this PMP is to implement a proactive program of identification, prevention and monitoring of pests (herbs, shrubs and deciduous (broadleaf) trees) while carrying out sound silvicultural practices. This Integrated Pest Management (IPM) framework will allow plantations to achieve free growing status within the timeframe required and reduce potential volume losses as a result of mortality and/or suppressed growing conditions. The end result is to ensure that BC Timber Sales silviculture obligations are fulfilled.

Objectives guiding this PMP are as follows:

- ▶ To establish free growing crop trees on a disturbed area in a cost effective manner with full consideration of human safety and social, environmental, and cultural values.
- ▶ To control competing vegetation or brush encroachment of young tree seedlings.
- ▶ To establish a clear decision making process that sets standards for timely and effective treatments.
- ▶ To promote the use of integrated vegetation management that minimizes vegetation pest problems and reduces the need for the use of herbicides.
- ▶ To promote reforestation of well-stocked stands and valuable tree species that support the Timber Supply Analysis.
- ▶ To provide an open forum for public participation concerning PMP development and content.

This Pest Management Plan (PMP) is comprised of five main components:

Section 1 provides general information on where the proposed pest management will take place, the term of this PMP, the person responsible and principal contact.

Section 2 describes the components of the Integrated Pest Management (IPM) protocol to be followed. This includes the strategies, practices and decision-making criteria to be followed in the IPM delivery. Preventative measures, identification, monitoring methods, treatment thresholds, treatment options and selection, post treatment evaluation and the PMP Operating Zones are all discussed in detail.

Section 3 outlines operational safety standards for pesticide transport, storage, mixing and applying, disposal and spill response.

Section 4 outlines environmental protection strategies such as protecting water sources, protecting fish and wildlife habitat, protecting food, pre-treatment inspection procedures, calibrating application equipment, and monitoring weather conditions.

Section 5 identifies each pesticide and how each will be applied, including specifying types of equipment.

1.2 Scope of this PMP

This Pest Management Plan is restricted to Crown land areas within the Mackenzie TSA, which forms part of the BCTS Prince George Business Area (see Appendix I for a map of the PMP area). The Mackenzie TSA is located north of Prince George surrounding Williston Lake and includes the community of Mackenzie.

1.3 Term

This PMP will be in effect from January 01, 2014 to December 31, 2018.

1.4 Contacts

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2.0 INTEGRATED PEST MANAGEMENT PROGRAM

2.1 Preventative Measures

Integrated Pest Management (IPM) is a strategy focusing on long term prevention of pests or their resultant damage. Techniques such as manual brushing, chemical and/or biological controls may be implemented. Pesticides are used only after monitoring indicates they are needed according to established guidelines. Pest control methods are selected and applied in an effective and economical manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.

Preventing vegetation from becoming a pest is an important component of this PMP. The following defines the existing management strategies and commitments of BC Timber Sales silviculture program for preventing vegetation from becoming a pest.

Prediction (planning):

The *Forest and Range Practices Act* stipulates that a Site Plan (SP) must be prepared in order for a cutblock to be harvested. Similar plans known as silviculture prescriptions were developed under pre-existing legislation. A Site Plan defines management strategies for all aspects of forest operations. Details in the plan include harvest plan information, biogeoclimatic classification, stocking standards, maximum soil disturbance, retention requirements and other critical factors.

Blocks are generally stratified using the Biogeoclimatic Ecological Classification (BEC) system during the development of the SP. Site specific data (vegetation and species distribution, expected brush hazard, and moisture and nutrient status) coupled with knowledge of how vegetation responds to harvest on a given ecotype is used to predict a potential pest problem and prescribe mitigating measures. Preventative measures might include site preparation, species selection, stock type selection, harvest timing, planting timing and alteration of stocking standards.

Stocking standards:

Stocking standards currently utilized by BC Timber Sales are approved under a Forest Development Plan or Forest Stewardship Plan. Approved variations from these standards may be applied for standard units having site-limiting factors.

Site Preparation:

The intent of site preparation is to reduce the impacts of growth limiting factor(s) that might inhibit seedling establishment or growth potential, and/or to encourage the natural regeneration of trees. The need for site preparation is usually identified at the prediction stage (SP) and verified during a post harvest assessment.

Figure 1 Objectives of Site Preparation

Limiting Factor	Site Preparation Method
Reduce established vegetative competition	Mechanical, Manual, Chemical, Prescribed Burning
Improve soil temperature	Mechanical, Prescribed Burning
Improve soil moisture and aeration	Mechanical
Reduce slash loading/increase no. of plantable spots	Mechanical, Prescribed Burning
Improve drainage	Mechanical
Encourage natural regeneration of trees	Mechanical, Prescribed Burning

Planting Improved stock:

The use of high genetic worth stock for reforestation operations will ensure better survival and performance of planted seedlings. BC Timber Sales will continue to plant high quality and improved stock.

Species selection:

Species selection will be made based on the ecological suitability of a species to the specific site conditions present on an area. Additional considerations include immediate and long-term forest health factors, future products, volume and value, and consistency with Timber Supply Analysis.

Stock type:

Successful seedling establishment also requires the appropriate choice of stock type. Sites will be evaluated and appropriate stock type selected on the basis of competitive species, distribution and ability of seedlings to compete with present and potential competing vegetation, and the ability of seedlings to establish themselves on the soil type found on-site.

Microsite Selection:

Optimum crop tree growth is achieved through the selection of appropriate microsites. Traditionally, planting carried out by BC Timber Sales has involved planting in mineral soil on raised microsites. Where duff and humus is shallow, planting without screening may be carried out to enable seedlings to use nutrients that are available in the organic-rich soils layers.

Planting timing (scheduling):

In order to ensure seedling survival, establishment, development and the ability to compete with associated vegetation, timing of reforestation activities on sites having high to very high brush hazards is critical. This may also preclude the need to carry out a brushing treatment. Where stock availability, slash loading, plantability, and other planning logistics allow, planting will be targeted within two growing seasons of harvesting activities.

2.2 Pest Identification

The *Integrated Pest Management Act* defines pest as “an injurious, noxious or troublesome living organism, but does not include a virus, bacteria, fungus or internal parasite that exists on or in humans or animals”. For the purposes of vegetation management activities under this integrated Pest Management Plan, the term pest refers to herbaceous, shrub and broadleaf (deciduous) complexes or communities that:

- ▶ Inhibit plantation establishment
- ▶ Hinder optimal growth and development of crop trees
- ▶ Prevent a stand from achieving free growing
- ▶ Affect an established plantation’s overall health
- ▶ When combined with snow causes damage to a crop tree by snow press.

For the purposes of this PMP, vegetation is divided into three possible competing vegetation communities.

- ▶ **Herbaceous plants (vegetation community A):** Herbaceous species predominately compete with newly planted seedlings for light and commonly contribute to vegetation and snow press. Species found in areas within this PMP include, but are not limited to: fireweed (*Epilobium angustifolium*), grass (*Calamagrostis* spp.), wood fern and lady fern (*Dryopteris* spp.).
- ▶ **Shrubs (vegetation community B):** Shrubs can be divided into two categories: low and high. Low shrubs are woody plants that typically grow to be less than 1.5 metres in height, whereas high shrubs tend to typically grow to heights taller than 1.5 metres.

- ▶ **low shrubs:** Include, but are not limited to: thimbleberry (*Rubus parviflorus*), black twinberry (*Lonicera involucrata*), white flowering rhododendron (*Rhododendron albiflorum*), prickly rose (*Rosa acicularis*), red elderberry (*Sambucus racemosa*), and red raspberry (*Rubus idaeus*).
- ▶ **high shrubs:** These include, but are not limited to: alder (*Alnus* spp.) and willow (*Salix* spp.). Alder is commonly found in many mature stands within the PMP area. After harvest, alder can potentially be a significant competitive species depending on the ecology, and the distribution and density throughout the site. It may negatively impact seedling establishment and development.
- ▶ **Broadleaf trees (vegetation community C):** Species include, but are not limited to: trembling aspen (*Populus tremuloides*), cottonwood (*Populus balsamifera*) and paper birch (*Betula papyrifera*). Many forest stands have a minor component of mature aspen. A moderate to very high brush hazard from aspen may occur after harvest of stands with a component of aspen due to root suckering. Plantations with greater than 1 000 stems per hectare (SPH) of evenly distributed aspen, cottonwood, birch are considered to have a potential brush hazard. Lower densities can be a brush hazard if their presence impacts seedling development.

The chief reference for the identification of these species providing a complete catalogue of plants commonly found within the PMP area is Plants of Northern British Columbia, (Mackinnon, Pojar, Coupe, 1999).

2.3 Monitoring Methods

Harvested blocks and plantations are evaluated on a regular basis. Each block, stratum and microsite present a unique environment for brush ingress. Properly timed and thorough surveys are essential in identifying and addressing problems which may affect the survival and/or growth of crop trees, or restrict the achievement of a free growing plantation.

Surveys and walkthroughs are scheduled throughout the plantations' development in order to ensure that stocking and brush levels are acceptable and that free growing parameters will be achieved within the appropriate time frame. The data and information collected during the surveys includes, but is not limited to the following: density of the vegetation, height of the crop trees, height of the brush species, type of brush species, and the affect the brush is having on the crop trees.

The normal monitoring regime is:

- ▶ **Pre-harvest stage:** Pre harvest brush assessments are performed while completing SP's. Evaluation and recommendation for pre-harvest vegetation management is initially assessed at this stage.
- ▶ **Year 0:** Post Harvest assessments to determine the plantability of an area, the necessity of site preparation, stock type selection, verification of the brush hazard of an area and to verify the site plan.
- ▶ **Years 1-4:** A regeneration delay survey is completed at the time of planting to ensure that regeneration delay has been met. A survival survey is carried out one to two years after planting to assess brush and other competing vegetation, and evaluate survival and performance of crop trees.
- ▶ **Years 5-9:** Regeneration surveys and/or walkthroughs in order to determine the levels of stocking and the need for brushing treatments.
- ▶ **Years 10-20:** Free growing surveys to determine whether free growing requirements have been met.

2.4 Treatment Thresholds

Decision Thresholds - Herbaceous and Shrub

The decision to treat will be based on whether competing vegetation meets the criteria as outlined in Section 2.2. Each block that is considered for vegetative management will have a brush assessment completed, and stocking levels and performance assessed. These assessments will be reviewed and approved by a qualified forest professional.

Decision Thresholds - Broadleaf

Conifer release from broadleaf trees may be required to reduce suppression or increase growth rates to meet free growing requirements. Specific thresholds with respect to treatment of deciduous are difficult to quantify. The following thresholds provide guidance:

- Distribution of deciduous species in an area > 1.0 hectare that results or may result in less than the minimum number of required free growing stems.
- Deciduous species encroaching upon the effective growing space of crop trees, where without treatment, free growing obligations may not be met.
- Deciduous species encroaching upon the effective growing space of crop trees where distribution and/or densities may result in mortality or the suppression of crop trees.

2.5 Treatment Options and Selection

Treatment selection is directly linked to the recommendations from a silviculture survey or Detailed Site Assessment (DSA). The selection process includes a determination of crop tree limiting factor(s) and the necessity for treatment through the use of treatment thresholds. If a treatment is required, information including treatment objective, target species description, and site limiting factors will be incorporated into the treatment selection process.

One or a combination of the following methods may be utilized during the term of this PMP:

Manual and Biological Methods

- ▶ Girdling
- ▶ Snap / Hinge
- ▶ Mechanical Brushing and Weeding (saw)
- ▶ Manual Brushing and Weeding (hand)
- ▶ Brush Mats
- ▶ Sheep Grazing
- ▶ Mechanical Site Preparation
- ▶ Prescribed Burning

Chemical Methods

- ▶ Aerial (Broadcast and/or Discretion)
- ▶ Backpack (Broadcast)
- ▶ Backpack (Directed Foliar)
- ▶ Backpack (Spot)
- ▶ Wick
- ▶ Hack and Squirt
- ▶ Basal Bark
- ▶ Roadside Sprayer
- ▶ Cut Stump

Factors Influencing Treatment Selection include:

Target Species Height – Backpack foliar treatments are typically not appropriate once the height of the target brush species approaches 2 metres in height. Sheep grazing will similarly be constrained by the ability of sheep to reach the foliage.

Target Species Diameter – While virtually any deciduous tree stem can be girdled, there are upper and lower diameter limits beyond which treatment becomes impractical. These will vary somewhat depending on the species of tree and the type of girdling tool being used. In general, diameters less than approximately 3 cm, or greater than 20 cm, are not suitable for treatment. Manual treatments will have an upper practical limit as diameters approach 10 cm.

Target Species Distribution – Broadcast foliar treatments are not appropriate if the target brush is distributed only in discrete clumps. Discretionary treatments are not generally appropriate if the target brush is uniformly distributed over the treatment unit.

Physical Impediments to Treatment – Large numbers of overhead obstacles such as residual trees can preclude aerial treatments. Steep slopes and heavy slash loading can make ground-based treatments such as backpack, manual, mechanical and sheep grazing impractical.

Degree of Constraint of Treatment Due to Required Buffering etc. – Blocks with many features that require buffering may be impractical to treat chemically. Pesticide free zones, no treatment zones, and buffers may be required for resource values such as water bodies, wetlands, roads, etc. Some highly constrained units may have little area left treatable once the chemical buffers are in place.

Target Species-Crop Tree Protection Conflict – Some brush species such as cow parsnip may no longer be susceptible to chemical treatment by the time the crop trees have hardened off sufficiently to avoid chemical damage. This incompatibility may be consistent every year, or it may only apply in certain years when a wet summer has slowed conifer hardening off or when early frosts cause succulent target species to wilt.

Special Wildlife Features – Special wildlife features may be identified within some units that will constrain treatment options. Heavy browsing might reduce the need for brushing in an area that had little alternative browse available. Manual and mechanical treatments might be restricted when the slash loads likely to result from the treatment could obstruct a heavily use game trail. Sheep grazing is opposed by MOE in higher grizzly bear use areas.

Aboriginal Rights Infringement – When specific information indicates that there is a higher likelihood of treatments infringing on aboriginal rights on a unit certain treatments may be considered unsuitable, or buffer / no treatment zones may be implemented. For example, if consultation with a First Nation produced information that a specific site was used for berry-picking, a broadcast chemical treatment would be considered inappropriate.

Potential for Conflict – Certain features of a proposed treatment unit might indicate that chemical treatment could result in an unacceptable risk of creating conflict with members of the general public, aboriginal groups, local residents or stakeholders. For example, proximity to a residence might result in the choice of a less controversial treatment.

Potential Damage to Crop Trees – Certain treatments may expose the crop trees in a unit to unacceptable levels of risk of damage. For example, crop trees that have developed under a thick aspen canopy often become spindly. Treatments that remove the surrounding stems suddenly can result in toppling of the crop trees. Aerial spraying or girdling may be preferred in such cases. Alternately, manual treatments may be inappropriate where heavy slash loading can occur or palatability of target vegetation can be an issue when considering sheep grazing.

Other factors such as treatment windows, time required to treat an area, administrative load, priority of treatment based on risk of crop tree mortality, and efficacy are weighed separately from the above process, but are also considered when selecting treatment methods.

Final treatment prescriptions are then verified in the field by experienced BC Timber Sales staff to ensure the most appropriate treatment is utilized.

Detailed site assessments or surveys for each anticipated treatment site will be completed within the 18 months prior to the scheduled treatment date.

2.6 Post Treatment Evaluation

Post-Treatment Evaluations shall be completed in the year following treatment when full leaf out has occurred. Evaluations will be completed by an aerial flight or an on-block field inspection. The assessments shall focus on the previous year's treatments with regards to efficacy of the treatment, coverage, slash loading, degree of release, crop tree damage, and verifying that the integrity of PFZ's and boundaries was maintained. The evaluation will also confirm that there was no unreasonable impact to the environment.

Future regeneration surveys on the areas will also be used to determine long-term efficacy of the treatment.

The Post-Treatment Evaluation will be implemented in an effort to refine future vegetation management prescriptions and strategies and it will determine the need for any immediate follow-up treatment (i.e. missed areas).

3.0 OPERATIONAL AND SAFETY STANDARDS

3.1 Pesticide Transport

Minimum standards for pesticide transport are stipulated in the *Transportation of Dangerous Goods Act*, and the *Integrated Pest Management Act and Regulations*. These minimum requirements are:

1. Transport shall be limited to undamaged containers.
2. All pesticides shall be secured during transport.
3. Decking of transport vehicle shall be of a non-absorbent material.
4. Spill cleanup equipment along with spill contingency plan and first aid kit shall accompany transported pesticides. Spill contingency and spill cleanup kit requirements are outlined in the BC Timber Sales Environmental Management System (EMS).
5. Transport of pesticides shall occur in a lockable compartment, separate from the passenger section of the vehicle.
6. All pesticides shall be kept in a locked compartment when vehicle is left unattended.
7. All drivers of vehicles transporting pesticides shall be trained and aware of the spill contingency plan.
8. Pesticides shall not be transported with food, feed, seeds, drugs, drinking water or clothing in the same compartment.
9. People and / or animals shall not ride in the back of a vehicle containing herbicides.
10. Herbicide mixture shall not be transported in mixing vessels. Mixture shall be transported only in labelled herbicide containers, marked "mixture" and include the mix ratio. Total mixture transported cannot exceed the single load capacity of the aircraft working from any mix site for aerial application, or the capacity for one refill for ground-based equipment in use.

11. Personal protection equipment and personal first aid equipment shall be carried in a closed compartment separate from the pesticide containers.
12. When transporting herbicides, required documentation includes Material Safety Data Sheets (MSDS) and Product Labels.

3.2 Pesticide Storage

The *Integrated Pest Management Regulation* stipulates that all herbicides, when not in use, shall be stored:

In a locked shed (not used for the storage of food intended for human or animal consumption and;

- a. having clearly posted warning signs (“**WARNING: CHEMICAL STORAGE – AUTHORIZED PERSONS ONLY**”) at each entrance,
- b. proper ventilation to the outside,
- c. accessible to authorized personnel only.

Temporary storage in the back of a locked vehicle (e.g. 5 ton van), is permissible when all conditions for herbicide storage are met. The locked vehicle must be parked in a location such that no product could flow into a water body should a leak occur while unattended.

3.3 Mixing and Application of Pesticides

All pesticides used under this PMP shall be mixed at designated mixing and filling stations. Requirements and procedures to be followed during the mixing and loading of pesticides are as follows:

1. Wherever possible, the mixing / loading station will be located in the treatment area. The mixing site shall be selected so that it is on level ground, and situated so that if a spill does occur, contamination of water bodies will not occur.
2. As a minimum, the Integrated Pest Management Regulation will be complied with, and a supervisor who holds a valid Pesticide Application Certificate of the appropriate category shall supervise each crew. Crew size will not exceed four (4) workers.
3. The minimum crew size for mixing and loading will be one (1) dedicated person. Crew size will be dependent upon the number of pieces of spray equipment in use for the operation.
4. Mixers and loaders of pesticides shall have an emergency spill kit on site and be familiar with BC Timber Sales’ Spill Contingency Plan. Mixers and loaders shall ensure that all equipment is in good operating condition.
5. The appropriate protective clothing and personal protection equipment as specified on the pesticide label shall be worn.
6. Ensure that an appropriate backflow device is used within the system used to fill the application equipment.
7. Equipment shall not be left unattended during filling.
8. First aid equipment and an eye wash station shall be located in close proximity of the filling station.
9. Ensure that clean water is available for rinsing.
10. Ensure that approved rates are not exceeded.
11. Know the exact inventory of product on site prior to starting any mix block.
12. Perform all mixing outdoors. If mixing in the back of a vehicle, ensure adequate lighting and ventilation is available.
13. Load water into delivery system last in order to rinse lines free of residual herbicide.

3.4 Container and Unused Pesticide Disposal

All 115 litre empty returnable pesticide containers (shuttles) are to be returned to the manufacturer for re-use. If the containers should become damaged, they shall be triple rinsed and returned for recycling. Upon project completion, all 10 litre containers should be triple rinsed, punctured and disposed of in a landfill which is under the control of the Regional District, and has been approved for pesticide container disposal. All rinse volume shall be drained into the spray tanks for application onto the treatment area.

Applicators must ensure that they have no more than 500 (five hundred) litres worth of empty pesticide containers on any site at any given time. In order to exceed this limit, the applicator or PMP holder will require a Generator Registration Number, pursuant to the *Environmental Management Act*, Hazardous Waste Regulation, Schedule 6.

3.5 Spill Response

A spill plan is an integral part of this PMP. All contractors engaged in herbicide operation activities shall be familiar with the BC Timber Sales Prince George Business Area, Environmental Management System (EMS), Emergency Response Manual and shall keep this plan available at all mixing and loading stations as well as in the compartments of vehicles involved in the transportation or storage of herbicides.

For spill plan content and responsibilities, refer to this EMS Emergency Response Manual. Hazardous Materials Spills, Spill Preparedness, Spill Preparedness Responsibilities and Spill Action Steps are discussed in detail.

Initial Spill Response Activity

Initial response activity is consistent with the BC Timber Sales Environmental Emergency Response Plan. It may be updated as modifications to the BC Timber Sales Environmental Emergency Response Plan occur. The following is an excerpt from that Response Plan that discusses Spill Action Steps.

1. Discovery and Assessment

- ☒ Follow safety procedures and use appropriate personnel protective equipment prior to initiating response plan
- ☒ If Safe, **STOP THE PRODUCT FLOW!** Halt activities that are causing the spill (e.g. Close valves; elevate leaking hoses, shut off pumps, etc.) **Minimize Impact of Spill**
- ☒ Prior to taking action complete an incident assessment (Safety, Spill Id/Volume and Environmental)

2. Notification and Documentation

- ☒ Report spills in accordance with spill reporting criteria listed "Table 1" below.
- ☒ **If you feel that the spill is beyond your level of training and experience to handle, it is advisable that you seek assistance from a spill response specialist.**

3. Containment and Recovery

- ☒ Take action within your ability using resources (hand tools, heavy equipment and spill response equipment) at hand to minimize the spread and impact of the spill until additional resources and expertise arrive.

Spills to Land

- ☒ Determine extent of spill. Contain spills away from water course.
- ☒ Mark the perimeter of the spill, Dig recovery ditches around the perimeter and recovery pits (sumps) within the spill area.
- ☒ Monitor ditches and recovery pits to ensure the collection system is effective
- ☒ Recover the product from the containment area, treat or dispose of appropriately.

Spill to Water

- ☒ In a ditch or stream contain the spill using whatever surface water containment system possible

- ☒ Divert and corral the spilled product to the containment system using absorbent booms or other methods
- ☒ Continue to sweep and corral the spilled product to one corner for recovery

For Spills less than 25 litres

- ☒ Soak up all free products with absorbent pads, booms, and other materials.
- ☒ Place used absorbent materials in a heavy duty plastic bag or other suitable container for disposal or recycling. Mix stained soil with loose absorbents or commercial bioremediation agents.

4. Follow-up, Disposal and Site Restoration

- ☒ Ensure spills have been documented and reported to agencies and BC TIMBER SALES as required.
- ☒ Complete clean-up and required mitigation actions, If required contact a spill response specialist for assistance
- ☒ **Complete CHK-009 Incident Report Form and submit to BC TIMBER SALES**

Spill Roles and Responsibilities

- ☒ **Assess risk for potential spills** identify additional preventative and control measures
- ☒ **Ensure all workers understand Emergency response plan** and is available on site at all times
- ☒ **Ensure all workers are familiar with potential spill sites, spill kit locations and spill kit requirements**
- ☒ **Ensure workers are trained/aware** in WHMIS, TDG and Spill response
- ☒ Have available, on site appropriate MSDS
- ☒ **Conduct periodic drill(s) of spill preparedness and response** based on employee knowledge and experience, environmental impact, and adjacent values. Where applicable refer to local procedures. Complete BC TIMBER SALES CHK-010 Emergency Response Test & Drill Report Form and retain records for BC TIMBER SALES review.
- ☒ **Complete spill kits inspections and maintain spill kits** as necessary

Spill kits must be present in vehicles transporting and dispensing fuels and pesticides.

Minimum Spill Kit requirements include:

- ☐ 3 - Heavy duty plastic bags or suitable container(s),
 - ☐ 10 - absorbent pads (or equivalent absorbent material) appropriate for each type of spill,
 - ☐ 3 – 3"x 48" absorbent booms/ socks,
 - ☐ Commercial bioremediation product,
 - ☐ One shovel
 - ☐ A container of emergency tank sealant (i.e. Plug-N-Dike, Seal-it or equivalent which are commercial product names for bentonite clay)
 - ☐ Personal protective safety gear as required for the type of spill
- ☒ **Respond to all spills** in accordance with the emergency response plan
 - If you are responsible for a spill of hazardous material, you are then responsible to take appropriate actions to minimize environmental impact.

Report all reportable spills to the appropriate agencies and to BC Timber Sales.

Spill Reporting Criteria

- ☒ All spills that are equal to or greater than the Provincial Emergency Program (PEP) reportable level must be reported to PEP as soon as possible and within 24hrs.
- ☒ Any spills of deleterious substance to a watercourse must be reported to PEP as soon as possible and within 24hrs.
- ☒ All spills that are equal to or greater than the BC TIMBER SALES reportable level must be reported to BC TIMBER SALES contact as soon as possible and within 24hrs.

Figure 2: Reportable Levels of Hazardous Materials Spills

Hazardous Material	PEP Reportable Level ⁽¹⁾	BC TIMBER SALES Reportable Level ⁽²⁾
Antifreeze	5 kilograms (5 litres)	5 litres
Diesel fuel	100 litres	25 litres
Gasoline (auto & saw)	100 litres	25 litres
Greases	100 litres	25 litres
Hydraulic Oil	100 litres	25 litres
Lubricating Oils	100 litres	25 litres
Pesticides	1 kilogram	1 kilogram

(1) as required by the BC Spill Reporting Regulation

(2) or a spill of ANY quantity that enters a surface water body (e.g.: running ditch, stream, lake)

4.0 ENVIRONMENTAL PROTECTION

4.1 Strategies to Protect Watersheds

There are various watershed assessments that have been completed or are being conducted within the Prince George Business Area. Where results indicate that vegetation management activities should be restricted in a watershed, the recommendations will be considered prior to treatment of any areas of concern.

4.2 Strategies to Protect Domestic and Agricultural Water Sources

A minimum 30 meter no-treatment zone will be maintained around any water supply intake or well used for domestic or agricultural purposes. This includes any water source utilized for livestock or for irrigation of crops. This complies with S.71(3) of the Integrated Pest Management Regulations.

4.3 Strategies to Protect Fisheries Resources and Riparian Areas

Riparian features are identified pre-harvest and protection measures prescribed through approved Silviculture Prescriptions, Site Plans, Forest Development Plans, or Forest Stewardship Plans. Riparian features are further assessed through silviculture surveys, detailed site assessments, pre-treatment inspections by BC Timber Sales staff, treatment layout, and the final pre-treatment block reconnaissance.

The area encompassed within this PMP includes many significant fisheries values. In keeping with mandates outlined in all forest plans and relevant legislation, identified fisheries and riparian habitat shall be protected with a PFZ and an appropriate buffer width as defined in Figure 3.

Figure 3 Minimum Pesticide Free Zone and Buffer Widths

Area of Concern	Application Method	PFZ Width (m)	Buffer Width (m)	No Treatment Zone Width (m)
Classified S1,S2,S3,S4 Streams, L1,L2,L3,L4 Lakes W1,W2,W3 Wetlands	Aerial (low drift delivery system)	10	5	
	Backpack (Broadcast)	10	5	
	Backpack (Directed Foliar)	10	5	
	Backpack Cone	10	5	
	Hack and Squirt	10	5	
	Cut Stump	10	5	
	Backpack Basal	10	2	
Wet S5, S6, NCD's (non commercial drainages)	Aerial (low drift delivery system)	10	5	
	Backpack Ground	10	5	
	Backpack (Directed Foliar)	2	3	
	Backpack Cone	2	3	
	Hack and Squirt	2	3	
	Cut Stump	2	3	
	Backpack Basal	10	2	
Dry S5, S6, NCD's, Temporary free standing body of water <25 m ²	Aerial (low drift delivery system)	N/A		
	Backpack Ground	N/A		
	Backpack Cone	N/A		
	Hack and Squirt	N/A		
	Cut Stump	N/A		
	Backpack Basal	10	2	
Temporary free standing body of water >25 m ² - (not fish bearing and does not drain into a fish bearing water body, and is not a classified wetland nor a wildlife habitat feature) ¹	All application methods	High Water Mark	N/A ²	
Domestic water intake	Any			30
Active beaver lodge/ pond/dam (slope less than 10%)	Aerial (rotary)	-	-	50
Active beaver dam (slope greater than 10%)	Aerial (rotary)	-	-	90
Raptor nest	All (except manual)	-	-	100

- 1) Glyphosate may be applied to a body of water, providing it meets the above three criteria and is either smaller than 25 m² or not a wetland. Glyphosate may be applied to a dry stream bed if the dry stream is not a wildlife habitat feature and is not fish bearing when wet.
- 2) For Temporary free standing bodies of water >25 m² an appropriate buffer will be established as required.

4.4 Strategies to Protect Wildlife Values

The Prince George Business Area has many important and diverse habitats for mammals, birds, amphibians and fish species. Wildlife shall be managed according to current and evolving biodiversity guidelines and all standards as stated within legislation will be followed.

For the purposes of this PMP, criteria used for habitat management will be set in the context of biodiversity guidelines. Specific attention will be given to those species and/or habitats that are noted in the Species at Risk Manual that was created for BCTS of the Prince George Business Area.

All wildlife values and critical habitats identified in higher level plans, or while conducting fieldwork, or through the consultation/referral process shall be considered prior to carrying out any treatments under this PMP.

Examples of treatment objectives tailored to suit wildlife habitat needs include:

- ▶ pesticide free zones
- ▶ pesticide dosage thresholds for areas of significant value
- ▶ spot treatments
- ▶ manual treatments
- ▶ where feasible, the retention of ungulate browse species such as willow and red osier dogwood

Standards for use as stated in the *Integrated Pest Management Regulation* are considered to provide adequate habitat protection for all other wildlife and plant species of concern within the PMP area.

4.5 Strategies to Protect Vulnerable Plant Species

Vulnerable plant species are defined as those plant species whose numbers are either limited or are important for browse and forage. The status and distribution of rare plant communities is available from the Conservation Data Centre online at: www.env.gov.bc.ca.

4.6 Strategies to Protect Food Plants Intended for Human Consumption

First Nations and stakeholders use berry plants and other special plants for food and medicinal purposes. As part of the public review and consultation process for this PMP and annual Notifications of Intent to treat (NITs), BC Timber Sales will attempt to learn of important berry-picking and medicinal plant harvest areas. On a site-specific basis, where proposed treatment areas are identified as containing food or medicinal plants intended for human consumption, BC Timber Sales will attempt to prevent exposure to herbicides by utilizing selective treatments, timing of treatments, using non-herbicide treatments or avoidance of treatment. All blocks treated with herbicides will have signs at entrances as required by the IPM regulations.

4.7 Pre-Treatment Inspection Procedures for Identifying Treatment Area Boundaries

Once a block is identified as requiring treatment, BC Timber Sales GIS staff carry out a spatial exercise to identify proposed treatment areas that are adjacent to and/or overlap First Nation Reserves, private properties, stakeholder interests and Species at Risk communities. Potential conflicts are individually explored and strategies identified to mitigate or negate harmful impacts to adjacent interests.

Treatment Area Layout

With strategies in place as appropriate for each block, trained staff lay out the treatment areas. Layout activities are carried out using GPS .shp files, aerial photos and/or the most recent map as a reference.

Layout consists of an intensive block reconnaissance to identify and mark all treatment boundaries, PFZ's, associated buffers, No Treatment Zones and retention patches identified in the silviculture survey or Detailed Site Assessment, or discovered during the reconnaissance. Additionally the treatment prescription is verified to ensure:

1. the most appropriate treatment is prescribed;
2. external and internal treatment boundaries are adequate to ensure pesticide is not applied to adjacent property and sensitive features; and
3. applicable regulatory requirements and standards can be met while carrying out the brushing treatment.

All boundaries are located and tied in using GPS or compass and hipchain to then be accurately mapped. Treatment area boundaries not already captured on the layout maps are GPS traversed. Riparian areas and PFZ's are GPS traversed as part of layout.

Treatment boundaries are clearly marked with bags or flagging ribbon to ensure they are clearly visible to the herbicide applicators.

Following field layout, the GPS .shp file is entered into BC Timber Sales forest management computer system (RESOURCES) so that the exact treatment area boundary and all internal boundaries such as PFZ's are captured. Using this updated information, finalized treatment maps are produced which incorporate all treatment boundaries, PFZ's, associated buffers, No Treatment Zones and retention patches. These maps, along with a GPS.shp file, are provided to the pesticide application contractors. This GPS .shp file is entered into all field computers including the GPS computer onboard any helicopters involved in herbicide application.

Final Pre-Treatment Block Reconnaissance

Immediately prior to the application of herbicide, a final block reconnaissance is carried out for each treatment area. For aerial applications this is done by helicopter with the application pilot. The implementation supervisor is also present on this flight.

During this final reconnaissance, the following are reviewed:

1. Verify that all pesticide applicators and monitors understand the block layout, permit specifications, application rate and the location of any special resource features that are to be protected.
2. All boundaries, PFZ's and NTZ's present on the block are verified.

For aerial applications, the layout map and the pilot's digital map on their onboard computer are compared against what actually exists on the ground.

Any changes on the ground that have occurred since layout (e.g. heavy rains may have happened since the layout resulting in a temporary water body), or a water body may have been missed during layout, are identified. Any new features are GPS traversed and entered into the aerial applicators onboard GPS computer or added onto layout maps for other application methods.

3. Are all boundaries, external and internal, 100% clear and understood by individuals who will be applying the herbicide including the pilot and implementation contractor personnel prior to commencement?
4. Is the general public, grazing wildlife or livestock present in the treatment area? Treatment does not commence until it is confirmed there is no presence of the general public, and there is no visible grazing wildlife or livestock in the treatment area.

4.8 Herbicide Application Calibration

All herbicide application equipment shall be calibrated to the satisfaction of BC Timber Sales before herbicide application operations commence. This includes verifying that the application equipment is in proper working order and, if required, is calibrated to conform to the application rates on the pesticide label.

Calibration is an ongoing process. Equipment speeds, nozzle sizes, spray pressure and helicopter height are examples of variables that are adjusted during spray operations to achieve optimal herbicide application coverage and rates.

Aerial

Equipment calibration and swath kit analysis will be performed by BC Timber Sales staff or an approved external contractor. Proof of calibration and the swath kit analysis shall be submitted to BC Timber Sales and kept for at least 2 years.

Maintenance of the spray equipment is the responsibility of the application contractor. The contractor shall have qualified personnel on each spray site who will ensure the equipment conforms, at all times, to the manufacturer's standards.

Ground

The application contractor shall calibrate equipment used for backpack applications.

Equipment should be calibrated:

- for each individual applicator using hand-held or backpack equipment;
- at the beginning of each season and the start of each new treatment area;
- any time the application equipment is changed or repaired;
- for each change in size or type of nozzle; and
- any time the pesticide or formulation of a pesticide is changed

A maintenance person, designated by the application contractor, must conduct maintenance and repairs. The maintenance person must be knowledgeable in the operation and repair of the equipment. The equipment operation must conform to the manufacturers' specifications. Records will be kept by contractors for each piece of calibrated equipment for a minimum of 2 years.

4.9 Weather Conditions and the Application of Herbicide

Aerial Broadcast

Aerial broadcast spraying operations shall be stopped when any of the following conditions exist on the treatment Unit(s):

- a) wind velocity exceeds 8 km/h;
- b) temperature exceeds 26.5°C;
- c) temperature is at or below 0°C for dormant application;
- d) relative humidity (R.H.) is less than 50% (R.H. as low as 40% may be accepted when high volume and large droplet-producing nozzles e.g., D10-46, Acuflo®) are used;
- e) snow or ice covers brush;
- f) when vegetation is too wet (from dew or precipitation);
- g) when precipitation is predicted within one hour (VisionMax) or two hours (Vision) following herbicide application (exceptions will be discussed at the pre-work conference);
- h) inversion or air turbulence (e.g. thermal updrafts) is so great as to seriously affect the normal application pattern;
- i) foggy weather; and
- j) inadequate daylight for safe application.

(NOTE: Herbicide label restrictions will take precedence over those listed in this paragraph where those label restrictions are more stringent)

The Ministry Representative or designated, independent Contract Administrator on site will be responsible for collecting and monitoring weather conditions and will advise the Contractor when conditions are such that broadcast spraying operations cannot commence or are to be stopped. Spraying operations cannot commence or resume until such time as the weather conditions improve as determined by the Ministry Representative on site.

Ground Broadcast

Ground broadcast spraying operations shall be stopped when any of the following conditions exist on the treatment Unit(s):

- a) wind velocity exceeds 8 km/h or when wind is dead calm;
- b) temperature is at or below 0°C or exceeds 30°C;
- c) relative humidity (R.H.) is less than 25% for Ester formulations, or it is less than 30% for Glyphosate formulations
- d) rain, snow or ice covers brush;
- e) when vegetation is too wet (from dew or precipitation);
- f) when precipitation is predicted within two hours following herbicide application (exceptions will be discussed at the pre-work conference); or
- g) overall conditions favour herbicide drift.

Ground – Cut Stump and Basal Bark Applications

- a) Cut Stump and Basal Bark applications shall be stopped when the bole of the target trees is too wet from dew or precipitation.
- b) Basal Bark operations shall be stopped when the bole of target trees is covered with frost.

4.10 Pesticide Treatment Signs

Signs containing site specific information with regards to treatment of each site shall be posted at all road or trail accessible points to the treatment area. Signs will be posted prior to treatment and will remain posted for a

minimum of fourteen (14) days following treatment at which time they may be removed by a BC Timber Sales representative. All Pesticide Treatment Signs will:

- ▶ be of a minimum size of 550 cm²
- ▶ be water resistant
- ▶ display the title “**Notice of Pesticide Use**” in bold block letters that are clearly legible to a person approaching the treatment area. Substitution of “pesticide” with “herbicide” or another category of pesticide is permissible.
- ▶ contain the following:
 1. Date of Application
 2. Confirmation Number
 3. Pesticide Trade Name
 4. Pesticide Common Name
 5. PCP Number
 6. Purpose of Treatment
 7. Method of application
 8. BC Timber Sales Office, Address, Contact Name and Phone Number

5.0 PESTICIDES – IDENTIFICATION, METHODS OF APPLICATION AND EQUIPMENT USED

BC Timber Sales in the Prince George Business Area commits to using the lowest treatment rates that will provide effective control of competing vegetation. Chemical and biological pesticides to be used for brush control under this PMP are:

- ▶ **Trade Name:** *Vision®* **Active Ingredient:** *Glyphosate 35.6%* **PCP No.:** 19899
- ▶ **Trade Name:** *Vision MAX®* **Active Ingredient:** *Glyphosate 54.0%* **PCP No.:** 27736
- ▶ **Trade Name:** *Release®* **Active Ingredient:** *Triclopyr 48%* **PCP No.:** 22093
- ▶ **Trade Name:** *Vantage®* **Active Ingredient:** *Glyphosate 35.6%* **PCP No.:** 26884
- ▶ **Trade Name:** *Chontrol Peat Paste* **Active Ingredient:** *Chontrostereum purpureum* **PCP No.:** 29293

Figures 4.0 and 5.0 are tables outlining the major treatments and influencing factors governing those treatments to be used by BC Timber Sales in its vegetation management activities under this PMP.

Figure 4 Herbicide Methods

HERBICIDE APPLICATION METHODS					
	Aerial foliar (glyphosate)	Ground Broadcast and Directed Foliar (glyphosate and triclopyr)	Basal Bark (triclopyr)	Cut Stump, Hack & Squirt (glyphosate)	Chontrol Peat Paste
Efficacy*	2-4 years Herbaceous Deciduous	2-4 years Herbaceous Deciduous	4 + years Deciduous	4 + years Deciduous	Moderate reduction of resprouting and regrowth,
Types of Equipment / Method of application	Applying liquid herbicides to leaves with aerial broadcast.	Applying liquid herbicides to leaves and stems. Applied by hose, backpack sprayer, truck or ATV-mounted sprayer	Herbicide is sprayed on the lower 50cm of the stem. One sided, streamline or thin line methods.	Application of herbicide to cut stems of trees during or after slashing to prevent suckering.	Manual brushing followed by Chontrol paste applied topically to fresh cut stumps.
Workers Safety	Exposure to herbicide application minimal.	Exposure to herbicide. Proper safety gear needed.	Exposure to herbicide. Proper safety gear needed.	Exposure to herbicide. Proper safety gear needed.	Exposure to fungus. Proper safety gear needed.
Effects on Wildlife	Mammal populations: Reduce some cover in short term. Limited effect on food supply. Birds: Reduce some coverage for nests.	Mammal populations: Reduce forage and cover in short term. Birds: Reduce cover for nests.	Mammal populations: Reduce some cover in short term. Limited effect on food supply. Birds: Reduce some coverage for nests.	Mammal populations: Reduce some cover in short term. Limited effect on food supply. Birds: Reduce some coverage for nests.	Mammal populations: no reports of adverse effects on birds or mammals.
Effects on Fish	Adequate PFZ required.	Adequate PFZ required.	Adequate PFZ required.	Adequate PFZ required.	Adequate PFZ required.
Measures for Reducing hazards	PFZ and NWZ required.	PFZ and NWZ (no work zone) required. Danger snags fallen prior to entering area.	PFZ and NWZ required. Danger snags fallen prior to entering area	PFZ and NWZ required. Danger snags fallen prior to entering area	Danger snags fallen prior to entering area
Public concerns	Exposure to herbicide - Posting of signs and notification.	Exposure to herbicide - Posting of signs and notification.	Exposure to herbicide - Posting of signs and notification.	Exposure to herbicide - Posting of signs and notification.	No known mammalian toxins

Figure 5 Mechanical, Manual and Biological Methods

NON-CHEMICAL METHODS						
	Manual Brushing & Weeding	Mechanical Brushing & Weeding	Mechanical Site Preparation	Prescribed Burning	Manual or Mechanical Girdling and/or Snap/Hinge	Grazing (sheep and goats)
Efficacy*	< 1 year	< 1 year for herbaceous +/- 2 years for deciduous	3 – 5 years	3 – 5 years (if correct intensity achieved)	+/- 3 years setback for deciduous if successful	1-2yrs or longer if treatments repeated.
Types of Equipment / Methods of Application	Spot treat around crop trees, Hand held cutters.	Spot treat around crop trees, Brush saws or chain saws.	Crawler, excavator, disc trencher	Equipment & burning tools. Complete area burned.	Individual stem treatment removing bark from stems.	Stem cutting and defoliation by grazing
Worker Safety	Use of manual tools, repetitive movement, hard physically.	Use of dangerous tools & saws. High risk of injury. Exhaust fumes.	Use of dangerous tools and machinery.	Use of dangerous tools and machinery. Smoke and fire.	Use of dangerous tools and saws. Repetitive motion injuries	Very safe for workers
Effects on Wildlife	Mammals: May reduce access from debris and may reduce browse and hiding cover in short term. Birds: May reduce cover and nest opportunities.	Mammals: May reduce access from debris and may reduce browse and hiding cover in short term. Birds: May reduce cover and nest opportunities.	Mammals: May reduce access from debris and may reduce browse and hiding cover in short term. Birds: May reduce cover and nest opportunities.	Mammals: May reduce access from debris and may reduce browse and hiding cover in short term. Birds: May reduce cover and nest opportunities.	Mammals: May reduce access from debris and may reduce browse and hiding cover in short term. Birds: May reduce cover and nest opportunities.	Reduction of local food for native ungulates. Potential for negative interactions with predators such as cougars and bears.
Effects on Fish	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.	Adequate buffer required to keep debris out of watercourse and not increase direct sunlight on stream surface.
Measures for Reducing Hazards	NWZ required. Danger snags fallen prior to entering area	NWZ required. Danger snags fallen prior to entering area	NWZ required. Danger snags fallen prior to entering area	NWZ required. Danger snags fallen prior to entering area	NWZ required. Danger snags fallen prior to entering area	NWZ required. Danger snags fallen prior to entering area
Public Concerns	General acceptance of method	General acceptance of method	General acceptance of method	General acceptance, but concerns of smoke do exist.	General acceptance of method	General acceptance of method

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APPENDIX II

Guidelines for Pest Management Activities

Trapline TR0729T003

- 1) BCTS will provide annual written notification to the owner(s) of Trapline TR0729T003 by April 30th of each calendar year for the term of this Pest Management Plan (PMP) and will include:
 - ***An overview map outlining proposed treatments within the interest area for the calendar year.***
 - ***1:10 000 maps of any units proposed for treatment in the calendar year and within the interest area.***
- 2) If requested, BCTS will conduct on-site meetings with the owner of Trapline TR0729T003 to discuss site specific concerns and treatment options for scheduled treatments within the interest area.
- 3) BCTS will limit aerial operations within the interest area.
- 4) BCTS will use selective treatment methods where deemed operationally suitable.
- 5) If treatments are scheduled during a given calendar year, BCTS will provide additional notification (14 days) prior to treatment.

APPENDIX III

Guidelines for Pest Management Activities

Ministry of Forests, Lands and Natural Resource Operations - Sites and Trails BC

- 1) BCTS will provide annual written notification to Sites and Trails BC by April 30th of each calendar year for the term of this Pest Management Plan (PMP) and will include:
 - ***An overview map outlining proposed treatments for the calendar year within 100 meters of a recreation site, a forest interpretive site, or a recreation trail.***
 - ***1:10 000 maps of any units proposed for treatment in the calendar year and within 100 meters of a recreation site, a forest interpretive site, or a recreation trail.***
 - ***A written document outlining the nature and extent of the proposed treatment activities including a brief section explaining what the various treatment types entail if the treatment is to occur within 100 meters of a recreation site, a forest interpretive site, or a recreation trail.***
- 2) If requested, BCTS will conduct an on-site meeting with Sites and Trails BC to discuss site specific concerns and treatment options for scheduled treatments within the interest area.
- 3) If treatments are scheduled during a given calendar year, BCTS will provide additional notification (14 days) prior to treatment.

APPENDIX IV

Guidelines for Pest Management Activities

Trapline TR0738T001

- 1) BCTS will provide annual written notification to the owner(s) of trapline TR0738T001 by April 30th of each calendar year for the term of this Pest Management Plan (PMP) and will include:
 - ***An overview map outlining proposed treatments within the interest area (Takla Lake First Nation Traditional Territory) for the calendar year.***
 - ***1:10 000 maps of any units proposed for treatment in the calendar year and within the interest area.***
- 2) If requested, BCTS will conduct on-site meetings with the owner(s) of trapline TR0738T001 to discuss site specific concerns and treatment options for scheduled treatments within the interest area.
- 3) BCTS will limit aerial operations within the interest area.
- 4) BCTS will use selective treatment methods where deemed operationally suitable.
- 5) If treatments are scheduled during a given calendar year, BCTS will provide additional notification (14 days) prior to treatment.

APPENDIX V

Guidelines for Pest Management Activities

Trapline TR0729T004

- 1) BCTS will provide annual written notification to the owner(s) of trapline TR0729T004 by April 30th of each calendar year for the term of this Pest Management Plan (PMP) and will include:
 - ***An overview map outlining proposed treatments within the interest area (Trap Line TR0729T004 and) for the calendar year.***
 - ***1:10 000 maps of any units proposed for treatment in the calendar year and within the interest area.***
- 2) If requested, BCTS will conduct on-site meetings with the owner(s) of trapline TR0729T004 to discuss site specific concerns and treatment options for scheduled treatments within the interest area.
- 3) BCTS will limit aerial operations within the interest area.
- 4) BCTS will use selective treatment methods where deemed operationally suitable.
- 5) If treatments are scheduled during a given calendar year, BCTS will provide additional notification (14 days) prior to treatment.