Appendices

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Appendix IV: Letter from Deputy Chief Forester of BC Postponing the AAC

Determination for TFL 3 until July 1, 2008

Appendix V: "Potential for Extension of TFL 3 Management Plan #9 Timber Supply

Analysis and Twenty-Year Plan"

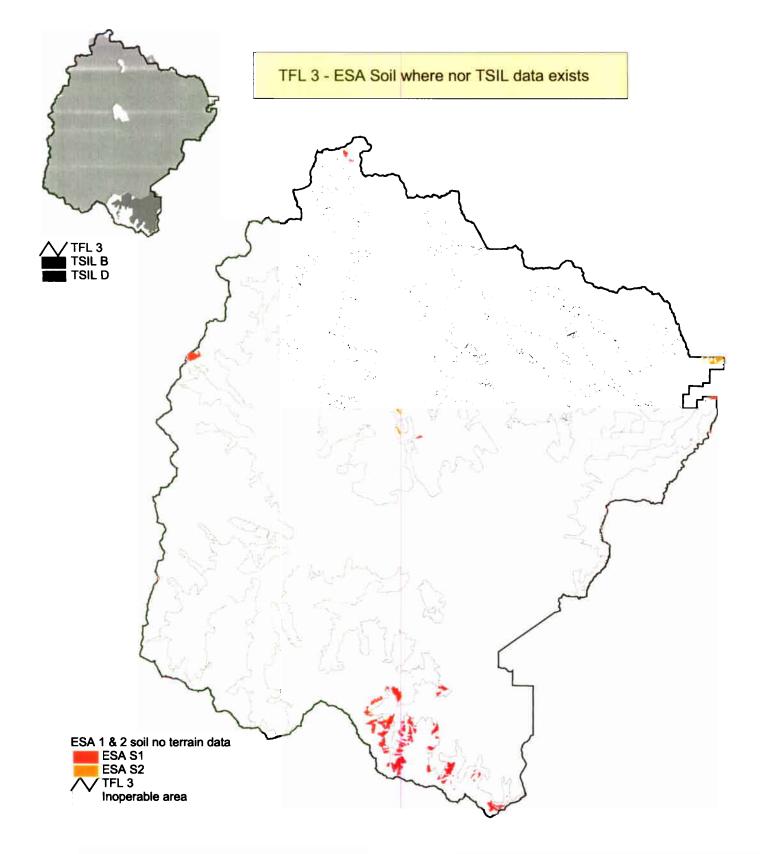
Appendix VI: Sensitive soil data and netdown review for TFL 3 Management Plan #10

Appendix VII: Letters received during Comment & Review period, including Slocan's

responses

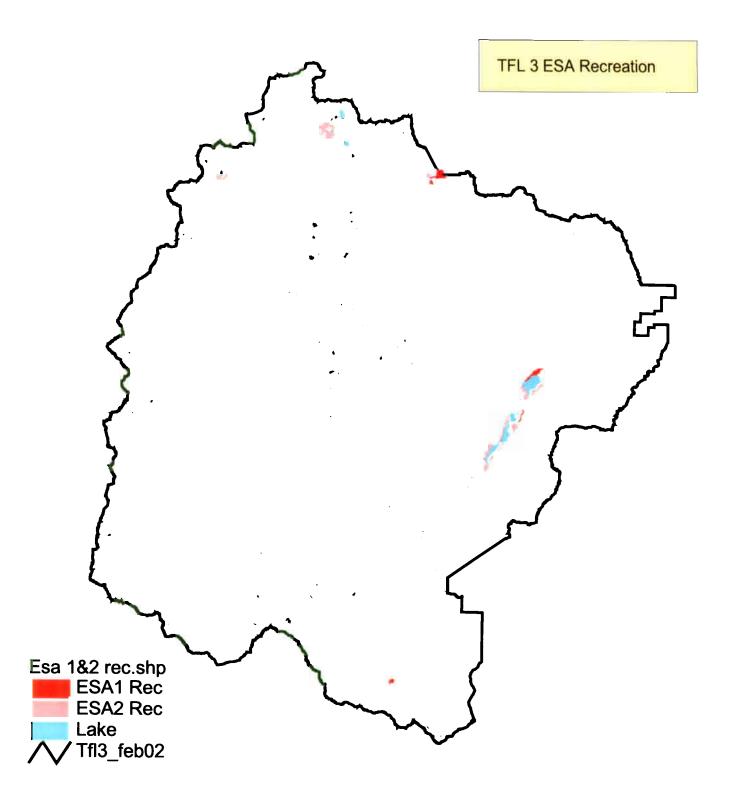
APPENDIX I: MAP FOLIO

- TFL 3 Resource Management Zones
- TFL 3 Slope Class map
- TFL 3 Water Features (including classifications, domestic watersheds and point of diversion)
- TFL 3 Forest Cover Age Class map
- TFL 3 Leading Species map
- TFL 3 Operability Information map
- TFL 3 Sensitive Terrain in Operable Areas
- TFL 3 Scenic Area map (with Recommended Visual Quality Class information)
- 20-Year Plan map from Management Plan #9
- Environmentally Sensitive Area (ESA) map info:
 - o ESA Soil where no TSIL (terrain survey intensity level) data exists
 - o ESA Recreation
 - o ESA Regeneration
 - o ESA Avalanche



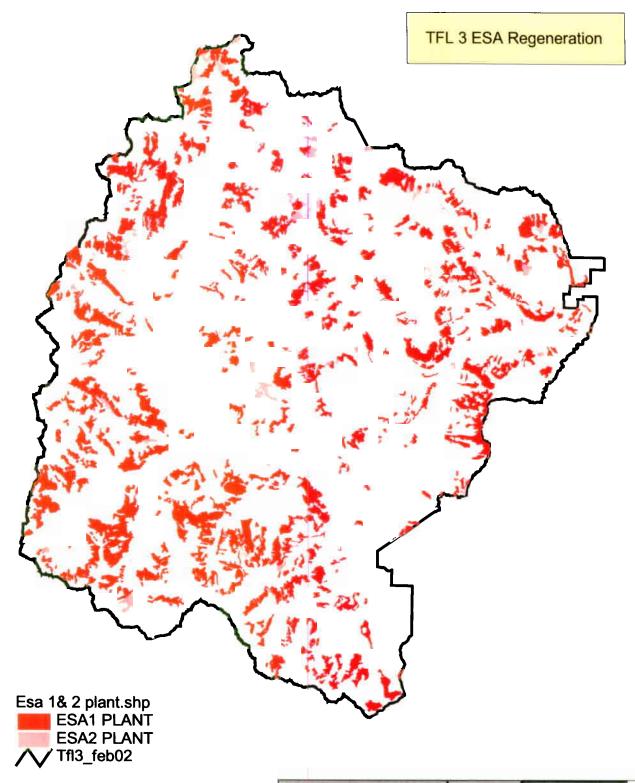
Chief Print	951147555		Area ha
Polygon	ESA S1	151	391.54
Polygon	ESA S2	17	41.16

Polygon	ESA S1	ALT	8	12.619
Polygon	ESA SI	INOP	2	373.720
Polygon	ESA S1	OPER	3	5.203
Polygon	ESA S2	ALT	1	3.742
Polygon	ESA S2	INOP	1	11.410
Polygon	ESA S2	OPER	1	26.007



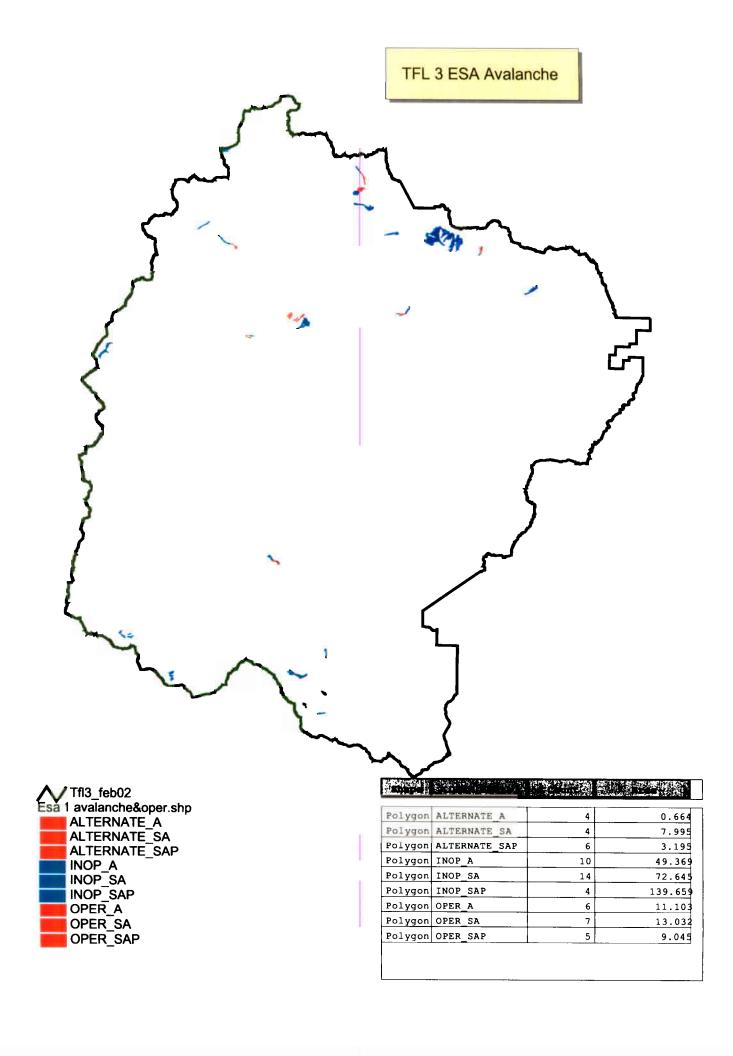
EGAL EGAS	Count	(Sum Arch 14)
ESA1 Rec	5	57.1998
ESA2 Rec	23	455.4460

	- Count	Sum_Area
ALTERNATE_ESA1 Rec	1	12.9228
ALTERNATE_ESA2 Rec	3	10.7123
INOP_ESA1 Rec	3	16.4787
INOP_ESA2 Rec	10	244.5246
OPER_ESA1 Rec	5	27.7984
OPER_ESA2 Rec	18	200.209



ECN!		Marcount (1)	Sum_Area
ESA1	PLANT	641	11888.8658
ESA2	PLANT	104	1523.7776

The state of the s	. 2. 5. 71 - 32.55	Sum_Area
ALTERNATE_ESA1 PLANT	192	657.6807
ALTERNATE_ESA2 PLANT	28	198.0535
INOP_ESA1 PLANT	519	9807.0552
INOP_ESA2 PLANT	78	831.7385
OPER_ESA1 PLANT	365	1424.129
OPER_ESA2 PLANT	78	493.9857



APPENDIX II: CORPORATE PROFILE

APPENDIX II: CORPORATE PROFILE

(source/direct excerpt from the Slocan Group corporate 2001 Annual Report)

Figure A.1 shows Slocan Forest Products Ltd.'s (the "Company") principal operating subsidiaries and the interests of the Company in Slocan Group, as well as their primary products or activities. The percentages on the chart refer to the percentage of voting securities beneficially owned or over which control or direction is excercised by the Company (except for Slocan Group, where the percentages refer to the partnership interest held). Slocan Group is a general partnership comprised of Slocan Forest Products Ltd, Tackama Forest Products Ltd and Plateau Forest Products Ltd.

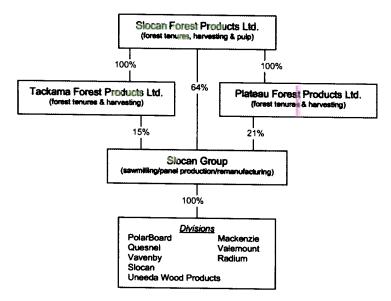


Figure A.1 Corporate Structure of Slocan Forest Products Ltd.

Slocan Forest Products Ltd. has developed, since it incorporation on May 2, 1978, into one of the largest forest products corporations in British Columbia, with timber resources and production facilities throughout the interior region of the province and a remanufacturing facility near Vancouver.

Slocan presently owns ten sawmills, a plywood facility, an oriented strand board (OSB) plant and a pulp mill. The combined total annual productive capacity of these facilities is approximately 1.65 million board feet of lumber, 280 million square feet (3/8 inch basis) of plywood, 800 000 BDUs of wood chips, 510 million square feet (3/8 inch basis) of OSB and 220 000 ADMts of pulp. The company also has a lumber remanufacturing and laminated beam facility in BC which has an annual capacity to produce approximately 30 million board feet of specialty lumber and 20 million board feet of finger jointed lumber and to kiln dry approximately 36 million board feet of lumber. This facility is also able to produce 35 000 cubic metres of laminated beams.

In June 2000, Slocan established a joint venture corporation, Slocan-LP OSB Corp., with Louisiana-Pacific. The joint venture is owned equally by the two companies and has been established to construct a new OSB plant in the Fort St. John area. The plant is expected to have an annual production capacity of 700 million square feet of OSB on a 3/8 inch basis.

The timber supply for Slocan's sawmilling, OSB and plywood is obtained primarily by harvesting under tenures granted by the province. Forest tenures presently held by Slocan provide for harvesting rights totaling nearly 5.7 million cubic metres (forest licences: 4.3 million m³; tree farm licences: 0.25 million m³; pulpwood agreements (including deciduous volume for OSB plants): 1.1 million m³).

APPENDIX III: MANAGEMENT PLAN REFERRAL LIST, SAMPLE LETTERS AND COPY OF NEWSPAPER ADVERTISEMENT

Copy of referral letter sent to Licensed Resource Users

November 29, 2002

- «FirstName» «LastName»
- «Company»
- «Address1»
- «City», «Province»
- «PostalCode»

RE: Tree Farm Licence #3 - Draft Management Plan #10

We have completed the draft management plan (MP) #10 for Tree Farm Licence (TFL) 3 – Little Slocan. The purpose of the management plan is to describe strategic forest management objectives and to discuss how we are addressing these objectives. This plan does not identify specific harvest cutblocks.

Usually one component of the management plan is a timber supply analysis, which reassesses the allowable annual cut (AAC) or harvest volume for the TFL. Earlier in the year, the Chief Forester of the province reviewed the changes in forest management issues and information and concluded that the AAC is not likely to be changed significantly with a new analysis. Thus, under the authority of Section 8(3.1) of the *Forest Act*, the Chief Forester postponed the next AAC determination for TFL 3 to July 1, 2008. As a result of this decision, there is no change in the AAC and draft MP 10 includes the timber supply analysis information and report and the 20-year plan from the previous management plan.

As another resource user, we are informing you that the draft plan is available for review until February 14, 2003. The plan is available, in full, in four locations (appointments are requested at all but the village office):

- Slocan Forest Products Ltd office: 705 Delany Ave, Slocan (250) 355-2100 contact Kathy Howard during business hours (Monday Friday 8 am to 4 pm)
- Slocan City village office: 503 Slocan St, Slocan during business hours (Monday Friday: 9 am to 4 pm)
- Ministry of Forests Nelson Region office: 518 Lake St, Nelson (250) 354-6200 contact Bernie Peschke during office hours (Monday – Friday: 8:30 am to 4 pm)
- Ministry of Forests Arrow Forest District office: 845 Columbia Ave, Castlegar (250) 365-8600 contact Ted Evans during office hours (Monday – Friday: 8 am to 4:30 pm, excluding noon to 1 pm)

We have also posted the plan on to the Slocan Group's website at www.slocan.com/tfl3. However, only the management plan document with resource maps is available on the website in adobe acrobat format, the previous MP timber supply analysis and 20 year plan is only available in the above mentioned offices.

We welcome your input into this planning process and ask that any comments be supplied in writing by February 14, 2003 to Ave., Slocan, BC V0G 2C0 Attention: Kathy Howard, RPF.

Yours truly,

SLOCAN FOREST PRODUCTS LTD.

Kathy Howard, R.P.F. Planning Forester

Licensed Resource User referral list – excluding Water Users (Water User list on following page)

Stakeholder Group	First Name	Last Name	Company
Trapper	Thor	Hird	
Trapper	John	Braun	
Trapper	Joanne & Ben	Hird	
Trapper	Hugh	McKean	
Trapper	Steve	Varney	
Woodlot	Kevin	Marr	
Woodlot	Gary	Burns	
Mining			Worldwide Graphite Producers Ltd.
Mining	Ted	Nunn	Crystal Graphite Corp.
Mining			Anglo Swiss Resources Inc
Mining	Marc	Goldenberg	
Mining	Rod	Luchansky	
Mining	Edwin	Varney	
Comm ercial Recreation	Jeff	Gfroerer	Kootenay Mountain Huts
Commercial Recreation	Lindsay	Hoyt	Valhalla Powdercats

list
referral
User
Water
Licensed

icensed water User referral list	er reterral	list							
Creek Name	Licence #	Last Name#1	First Name#1	Last Name#2	First Name#2	City	Prov	WRMap	
Saunders Springs	C100723	Akawashi	Akawashi			Nelson	BC	82.F.052.2.3 AA	
Airy Creek	C036541	Appleby	Anne E.	Appleby	James M.	Winlaw	S	5400Y	
Mary Spring	C039923	Atkinson	John C.	Atkinson	Diana	Austin	×	82.F.052.4.1 N	
Wilton Spring	F011273		Peter	Barisoff	Elizabeth	Winlaw	BC	82.F.052.2.3 A	
Airy Creek	C116968		Alexander G.			Slocan Park	ရွ	5400Y	
McKiblin Creek	C056185		Shirley A.			Grande Prairie	AB	82.F.052.4.1 J	
Mary Spring	C056255	Ü	Scott H.			Winlaw	မ္တ	82.F.052.4.1 M	
Frank Brook	C109833	Doerksen	Victor	Doerksen	Annilie	Slocan Park	မ္မ	5400K	
Airy Creek	C117335	Douglass	Mary H.			Seattle	۸	5400B3	
Talbott Creek	C032397	Gaines	Thomas M			Winlaw	မ္မ	5400W	
Airy Creek	C104083	Gatner	Larry M.			Airdrie	AB	5400UU	
Davisson Spring	C051693	Guenther	Horst	Guenther	Violet	Winlaw	ည္ထ	82.F.052.4.1 Q	
Airy Creek	C056088	Harvey	Tara-Lynn Renee			Winlaw	ရှင	5400MM	
Forssmann	C054198/C0	Hilger	Kur			Winlaw	ရှင	5400DD/5400EE	
Spring/Forrestal	54181								
Spring									
Pepin Spring	F021408	Hyshka	Brian S. G.			Winlaw	ပ္ထ	82.F.052.2.3 D	
Airy Creek	C116729	Jackson	Donald B.			Winlaw	မ္တ	5400Y	
Bellis Creek	C027073	Leckie	F. Russell			Winlaw	ရှ	82.F.052.2.3 H	
Airy Creek	C058682	Lerch	Robert J.	Lerch	Diane L.	Winlaw	ည္ထ	5400NN	
Airy Creek	C117334	Louise	Linda			Fruitvale	ရွ	5400B3	
Talbott Creek	C063114	Marcoux	Michael J			Vancouver	S C	5400SS	
McKiblin Creek	C058289	Martin	Russell C.			Winlaw	မ္တ	82.F.052.4.1 J	
Airy Creek	C108934	McDonald	Phillip J.			Winlaw	ပ္ထ	5400Y	
Forsyth Spring	C054199	McGee	Kenyon J.			Winlaw	မ္တ	5400FF	
Airy Creek	C036545	Milton	Ronald T.	Milton	Susan M.	Winlaw	မ္တ	5400Y	
Shukin Spring	F043739	Poznikof	Alan	Poznikoff	Elizabeth J.	Winlaw	ပ္ထ	82.F.052.2.3 G	
Saunders Brook	F108692	Robbins	Kent N.	Robbins	Julie V.	Winlaw	ပ္ထ	82.F.052.2.3 E	
Frank Brook	C113121	Schlichting	Carl D.	Schlichting	Dorothea	Slocan Park	မ္တ	5400K	
Dilhay Spring/Airy	C105234/C1 17336	Standidge	Donald D.			Winlaw	ရှင	82.F.052.4.1 W/5400B3	
Quadra Spring No.	C060910	Sutherland	Norman B.			Winlaw	ရှိ	82.F.052.2.3 J	
2/3/4	1040000	7	7.7.6				(1	
Springs Springs	0608107	Weiland	David John			Kossiand	ນູ	82.F.U52.2.3 B	
Dellis Cleek	02020	Williake	Mike			Velowna	ຊູ	82.F.U52.2.3 F	
Ally Creek	C030340	AVIIII	William		i	Winiaw	ي ه ز	5400₹	
Alry Creek	0//9110	SDOOM	John F.	Moods	Flaine	Winlaw	ည္က	5400B3	
Voykin Creek	C035/62	reow	Anthony S.			Winiaw	ည္က	82.F.052.2.3 W	
Valley Order	9999	Varney &				MPIIIM	2	02F/12(g) A	
Little Slocan River	Z114446	Fraser	lan R.	Fraser	Diana M.	Nelson	BC	5400XX	
ittle Slocan River	C060012	McKav	Builde		1	Winlaw) C	82 F 052 4 1 G	
ittle Slocan River	C111407	Sheets	Elizabeth			Windaw Windaw	<u></u>	02.1.032.4.1 G	
						MPIIIAA	2	02.F.032.4.1	

Copy of referral letter sent to First Nations groups and Government Agencies

November 29, 2002

- «FirstName» «LastName»
- «Company»
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As an interested party, we are informing you that the draft plan is available for review until February 14, 2003. The plan is available, in full, in four locations (appointments are requested at all but the village office):

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We welcome your input into this planning process and ask that any comments be supplied in writing by February 14, 2003 to Slocan Forest Products Ltd, 705 Delany Ave., Slocan, BC V0G 2C0 Attention: Kathy Howard, RPF.

Yours truly,

SLOCAN FOREST PRODUCTS LTD.

Kathy Howard, R.P.F. Planning Forester

First Nations and Government Agency referral contacts

Stakeholder Group	First Name	Last Name	Council/Band Agency
First Nation	Thomas	Munson	Ktunaxa/Kinbasket Tribal Council
First Nation	Pauline	Terbasket	Okanagan Nation Alliance
First Nation	Jeff	Eustache	Shuswap Nation Tribal Council
First Nation	Wayne	Terbasket	Lower Similkameen Indian Band
First Nation	Rob	Hutton	Okanagan Indian Band
First Nation	Joe	McInnis	Osoyoos Indian Band
First Nation	Greg	Gabriel	Penticton Indian Band
First Nation	Philippe	Batini	Upper Similkameen Indian Band
First Nation	Mickey	Werstiuk	Westbank First Nations
First Nation	Loretta	Eustache	Spallumcheen Indian Band
Govt	District Manager		Ministry of Transportation Nelson
Govt	Manager of Land Administration		BC Assets & Lands - Lands Branch - Cranbrook
Govt	Regional Director		Ministry of Water, Land & Air Protection – Nelson
Govt	Regional Director		Ministry of Sustainable Resource Management - Nelson

Copy of referral letter sent to individual who has shown interest in the TFL's planning during Forest Development Plan

November 29, 2002

Craig Pettitt Valhalla Wilderness Society Box 329 New Denver, BC VOG 1S0

RE: Tree Farm Licence #3 - Draft Management Plan #10

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As you have shown interest in the operations in the TFL through the forest development plan process, we are informing you that the draft plan is available for review until February 14, 2003. The plan is available, in full, in four locations (appointments are requested at all but the village office):

- Slocan Forest Products Ltd office: 705 Delany Ave, Slocan (250) 355-2100 contact Kathy Howard during business hours (Monday – Friday 8 am to 4 pm)
- Slocan City village office: 503 Slocan St, Slocan during business hours (Monday Friday: 9 am to 4 pm)
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We have also posted the plan on to the Slocan Group's website at www.slocan.com\tfl3. However, only the management plan document with resource maps is available on the website in adobe acrobat format, the previous MP timber supply analysis and 20 year plan is only available in the above mentioned offices.

We welcome your input into this planning process and ask that any comments be supplied in writing by February 14, 2003 to Slocan Forest Products Ltd, 705 Delany Ave., Slocan, BC V0G 2C0 Attention: Kathy Howard, RPF.

Yours truly,

SLOCAN FOREST PRODUCTS LTD.

Kathy Howard, R.P.F. Planning Forester

Tree Farm Licence 3 – Little Slocan Draft Management Plan #10

Slocan Forest Products Ltd., Slocan Division (SFP) would like to announce the completion of the draft Management Plan (MP) #10 for Tree Farm Licence (TFL) 3 – Little Slocan. The management plan is a strategic level plan which identifies and outlines the strategies for managing the various forest resource values over the next five years.

TFL 3 is located west of the Slocan River between Passmore and Slocan City.

Under the authority of Section 8(3.1) of the Forest Act, the Chief Forester of the province has postponed the next allowable annual cut (AAC) determination for TFL 3 to July 1, 2008. The Chief Forester concluded that the allowable annual cut for TFL 3 is not likely to be changed significantly with a new determination made according to the existing schedule. As such this plan includes the timber supply analysis information and twenty year plan that were created for the previous management plan (July 1998).

SFP welcomes public involvement and invites comments regarding the Management Plan. The draft plan will be available for review at the following locations (appointments are requested at all but the village office):

- Slocan Forest Products Ltd office: 705 Delany Ave, Slocan (250) 355-2100 contact Kathy Howard during business hours (Monday Friday 8 am to 4 pm)
- Slocan City village office: 503 Slocan St, Slocan during business hours (Monday

 Friday: 9 am to 4 pm)
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- Ministry of Forests Arrow Forest District office: 845 Columbia Ave, Castlegar (250) 365-8600 contact Ted Evans during office hours (Monday Friday: 8 am to 4:30 pm, excluding noon to 1 pm)

The management plan will also be available on the Slocan Group website at www.Slocan.com/tfl3. However, only the management plan document with resource maps will be available on the website in adobe acrobat format, the previous MP timber supply analysis and 20 year plan is only available in the above mentioned offices.

The draft management plan is available for review from December 4, 2002 to February 14, 2003. Any comments on the plan must be sent in writing to Slocan Forest Products Ltd, 705 Delany Ave., Slocan, BC V0G 2C0 Attention: Kathy Howard, RPF prior to February 14, 2003.



APPENDIX IV: LETTER FROM DEPUTY CHIEF FORESTER OF BC POSTPONING THE AAC DETERMINATION FOR TFL 3 UNTIL JULY 1, 2008



File: 12850/20-03

August 26, 2002

Tim Yanni, RPF Woodlands Manager Slocan Group 705 Delaney Ave. Slocan, B.C. V0G 2C0

Dear Mr. Yanni:

Attached please find a copy of an Order by which I have postponed the deadline for the next determination of the Allowable Annual Cut for Tree Farm Licence No. 3. As I discussed with Kathy Howard by telephone on August 7th, the postponement is for five years. The new determination deadline is July 1, 2008.

Yours truly,

Ken Baker

Deputy Chief Forester

Ker Baker

Attachment: Chief Forester Order Respecting an AAC Determination For Tree Farm Licence No. 3

pc: Larry Pedersen Chief Forester

Gary Townsend

Director, Timber Supply Branch

Jim Langridge

Director, Resource Tenures & Engineering Branch

Fred Baxter

Regional Manager, Kamloops Forest Region

Brian Simpson

District Manager, Arrow Forest District

Order Respecting an AAC Determination For Tree Farm Licence No. 3

Section 8 (3.1) of the Forest Act stipulates in part that

If ... the chief forester considers that the allowable annual cut ... is not likely to be changed significantly with a new determination ... the chief forester ... by written order may postpone the next [allowable annual cut] determination ... to a date that is up to 10 years after the date of the relevant last determination, and ... must give written reasons for the postponement".

In considering whether to postpone the next AAC determination for Tree Farm Licence No. 3:

I have reviewed each of the factors considered in the most recent relevant determination, made on June 25, 1998. That determination set the AAC at 80,000 cubic metres, effective on July 1, 1988.

I am aware that the timber supply analysis submitted in 1998 forecast a flat-line harvest level throughout the 200-year planning horizon, and I have reviewed the sensitivity analyses included in that analysis.

I have considered the significance of the requests that the chief forester made of the licensee in his 1998 AAC rationale, and what has transpired in reaction to those requests.

I have investigated whether any significant new information exists concerning each factor specified in Section 8 of the Act. I am aware that:

- Agreement has been reached on a definition of non-merchantable forest types, which would reduce the assumed timber harvesting land base by about one percent.
- The amount of area managed for visual quality has increased.
- Recent information on terrain stability indicates that the area suitable for timber harvesting may be greater than assumed in 1998, and which set the AAC at 80,000 cubic metres.
- Ungulate winter range mapping has been completed, and may have a slight downward impact on timber supply.
- The licensee has analyzed recent vegetation resource inventory information, which indicates that the total existing volume may be approximately 8 percent less than modelled in the 1998 Base Case. I am aware of the sensitivity analysis done at that time on the basis of a 10-percent lower volume.
- The licensee has not harvested in areas underlying the current partition to alternative harvesting systems. However, the current forest development plan includes an approved cutblock in such an area.

Since the 1998 analysis, the width of the riparian management zone for S6 consumptive use streams has been increased by 10 metres. This is not expected to have a significant impact on timber supply.

No new site index information is available.

New information indicates that improved planting stock may increase the long-term timber supply by about 14 percent.

The Kootenay-Boundary Higher Level Plan Order requires the establishment of connectivity corridors. This may slightly reduce timber supply.

In 1988, a requirement to retain mature timber, as currently specified in the Kootenay-Boundary Higher Level Plan Order, of itself would not have constrained timber supply.

(fug 26, 2002

After reviewing the factors considered in the last AAC determination and the currently available information, I have determined that the allowable annual cut for this area is not likely to be changed significantly with a new determination made according to the existing schedule.

Under authority of Section 8(3.1) of the *Forest Act*, I hereby postpone the next allowable annual cut determination for Tree Farm Licence No. 3 to July 1, 2008, being approximately ten years after the date of the last determination in 1998.

If I conclude in the interim that circumstances for the tree farm licence area have changed significantly, I may rescind this order as authorized by Section 8(3.2) of the *Act*, and set an earlier date for the next AAC determination.

Ken Baker

Deputy Chief Forester

APPENDIX V: "POTENTIAL FOR EXTENSION OF TFL 3 MANAGEMENT PLAN #9 TIMBER SUPPLY ANALYSIS AND TWENTY-YEAR PLAN"

Request to BC's Chief Forester for extension of MP 9's timber supply analysis and 20-year plan by SFP with supporting information on management objective and data changes during the term of MP 9.



Potential for extension of TFL 3 Management Plan #9 timber supply analysis and twenty year plan

At this point in time, Slocan Forest Products, Slocan Div. is comfortable with the current harvest level as set for TFL 3 in July 1998. We would like to request an extension of between 3 and 5 years on the current timber supply analysis and 20 year plan.

Summary information from Management Plan 9's Timber Supply Analysis

The Allowable Annual Cut that was approved, as requested in Management Plan (MP) #9, was based on an even flow harvest level of 80,000 m³. The sensitivity analyses identified five components that, if adjusted, could have an important (5-10%) harvest impact; land base change, minimum harvest age, old growth site index adjustment, stand volume and green-up heights. The two latter components, volume and green-up, are the only ones which as a result of the following changes in policy should be important to a new analysis. Both of these had about a 5% impact but the impact would be in opposing directions based on the changed information (i.e. reduced volumes and reduced green-up heights).

Changes since Management Plan 9's timber supply analysis

I. VRI – Phase I and II completed. Phase II resulted in height, age and volume adjustments as follows:

Stratum	Height adjustment ratio (%)	Age adjustment ratio (%)	Volume adjustment ratio (%)	Overall volume impact (%)	% of MP 9 THLB by area	% of MP 9 THLB by volume
FPLD1	0.862	1.019	1.357	1.027	46 %	42 %
Cedar/Hemlock	0.932	0.925	1.030	0.907	20 %	23 %
Balsam < 121 yrs	0.980	1.192	1.324	1.277	6 %	2 %
Balsam > 120 yrs	0.819	0.741	1.144	0.824	8 %	13 %
Spruce	0.895	1.021	0.839	0.722	20 %	20 %

Douglas fir, pine, larch and deciduous

II. Kootenay Boundary Higher Level Plan Order (KBHLPO) came into effect (Jan/01) since the approval of Management Plan #9 (MP 9). It should be noted that revisions to the KBHLPO are currently going through a comment and review period. Main components (consumptive use watersheds, visuals, biodiversity) of the Kootenay Boundary Land Use Plan – Implementation Strategy, which was released in June 1997, were included in MP 9.

KBHLPO consists of ten objectives:

- Biodiversity Emphasis all but Perry Landscape Unit (6129 ha) in TFL 3 have been designated as low biodiversity. Perry LU is designated as intermediate BEO. No change from MP 9 analysis.
- 2) Old & Mature Forests old and mature forest cover requirements were included in MP 9 as per the biodiversity guidebook percentages. It should be noted that MP 9 identified that the current TFL 3 forest cover did not meet the old seral requirements in all BEC variants. However, the analysis ensured that these requirements were met in the future. The existing KBHLPO allows 1/3 draw down of old requirements in Hoder and Koch LUs. The proposed revision to the KBHLPO only manages for mature in the ICHdw in Perry LU. This should be an upward pressure from the previous analysis.

- 3) Caribou no caribou habitat within TFL 3. No change.
- 4) Green up/Patch Size In MP 9, 3 metre green-up height was used for modeling integrated resource management (IRM) adjacency and 9 metre green-up height was used for modeling domestic watershed hydrologic recovery. Under the KBHLPO, 2.5 metre green-up height is to be used for IRM adjacency and in ERDZ-timber (outside of connectivity areas) sufficiently restocked (SR) status is to be considered greened up. Domestic Watershed hydrologic recovery green-up height will also be reduced to 6 metres to conform with new information that was used during the Arrow TSA's TSR 2. Upward pressure from MP 9.

Patch size analyses for Hoder and Koch LUs have been completed since MP 9 analyses, and where possible we are attempting to move towards the patch size process within the TFL. This should not have an effect on the timber supply analysis.

5) Grizzly Bear Habitat & Connectivity Corridors - Grizzly bear habitat management is to be done through the maintenance of mature and old forests adjacent to important avalanche tracks. These avalanche tracks have not yet been made known by the DEO, as per a requirement of the KBHLPO. However, through the environmental sensitivity areas (ESA) avalanche mapping polygons are excluded from the THLB within TFL 3. Avalanche track adjacency was not addressed in MP 9. During the last five years, we have had only one operation where we have had to manage specifically for grizzly bear habitat, this was as a result of a road crossing an avalanche track. This was addressed to the wildlife specialist satisfaction through timing of operations. This should have not cause any change to the analysis.

The purpose of the connectivity corridors are for regional forest ecosystem connectivity and this is to be achieved through the maintenance and preferential location of mature and old forests within the corridors. MP 9 did not include connectivity corridors in the timber supply analysis but SFP did define a connectivity area in a similar but smaller area for use in MP 9's Twenty year plan (The 20 year plan was completed through the use of Hugh Hamilton's Forest Simulation Optimization System model and included some timber supply analyses in a spatial format). Small to no downward pressure from MP 9.

- 6) Consumptive Use Streams increases riparian management zone of S6 streams by 10 metres. There are three main domestic watersheds within the TFL (and smaller portions of four others), MP 9 had a separate management zone for watersheds and managed them through an increased green-up height to represent hydrological recovery and a maximum percentage of area to be less than the age of hydrologic recovery (strategic level ECA). The expanded riparian management zone from the HLP, spatializes retention areas but no change to the strategic level watershed management practices (ECA). No change from MP 9.
- 7) Enhanced Resource Development Zones The significant portions of the operable ground within Hoder and Koch landscape units (the two LUs which make up all but 6000 ha of TFL 3) are designated as ERDZ-Timber. Some of this area is included in Connectivity Corridor. *Identified under objective 4* (green-up) as an upward pressure.
- 8) Fire Maintained Ecosystems no NDT 4 within TFL 3. No change.

- 9) Visuals With the definition of the Scenic Area in the KBHLPO, the area being specifically managed for visuals has decreased in TFL 3. However, the area that has been removed from visual management zone, since MP 9, overlaps significantly with the ungulate winter range area. No change to upward pressure to MP 9 analysis.
- 10) Forest Economy no discussion at this point in time.
- III. Ungulate winter range line work has been completed for TFL 3. During MP 9 this information was not available, however we suggested that the expanded visual management area (from Little Slocan Lakes) accounted for some recognition of management on the west side of Perry Ridge. Slight downward pressure from MP 9.
- IV. Inclusion of Genetic stock information in timber supply analyses is more accepted, it was not included in analysis for MP 9. Upward pressure to MP 9 analysis.
- V. Perry Ridge Local Resource Management Plan completed. Perry Ridge landscape unit (17998 ha) is split approximately 1/3 TFL (6129 ha), 2/3 Arrow TSA. The main focus of the Perry Ridge plan was on the TSA portion of the landscape unit but some of the strategies (i.e. old growth management areas, mature seral management areas, equivalent clearcut areas in sensitive hydrologic units) were incorporated into the TFL area. However, whereas this plan was accepted by the Arrow District Manager, it has not been declared a higher level plan and will likely have significant components superseded by the Kootenay Boundary higher level plan. Downward pressure to MP 9 until uncertainties of management are addressed.
- VI. Updated inventory information: fish stream classification, logging history. No significant change to MP 9.
- VII. Identified wildlife management strategy (1999): Operationally we were already managing for critical species however no specific netdowns apart from the ESA wildlife mapping was used in MP 9. We have mapped two goshawk nests within TFL 3 and will include these in subsequent analyses. Downward pressure to MP 9.

APPENDIX VI: SENSITIVE SOIL DATA AND NETDOWN REVIEW FOR TFL 3 MANAGEMENT PLAN #10

Information supplied to the Ministry of Forests – Arrow Forest District and Nelson Forest Region regarding sensitive soil data and review of netdown logic in preparation of data for MP 10.

Sensitive soil data and netdown review for TFL 3 Management Plan #10

As a result of this review, the following netdowns are planned for TFL 3 MP 10:

Where TSIL B mapping exist: V - 80%; IV - 13%

Where TSIL D mapping exist: U and U/P - 60%; P; P/S and P/U - 10%

Where only Es mapping exist: Es1 - 80%; Es2 - 10%

These netdowns are based on those used in the IFPA base case (TSIL B and TSIL D unstable areas), values used in TFL 3's Management Plan #9 (Es) and professional judgment based on the following information (TSIL D potentially unstable areas).

Review of Existing Data

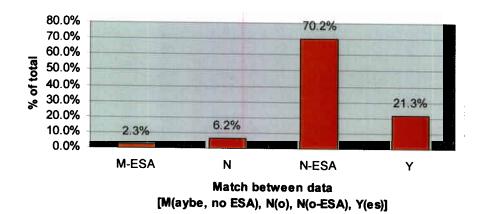
Comparison of TSIL and ESA Soil Data

A comparison was done reviewing how the TSIL B & D compared with the Es1 & Es2 polygons. The trends are similar between the two TSIL data sets and as the TSIL D is the larger portion of the TFL (46,392 ha), only it will be discussed. The comparison for both datasets is attached.

Of the entire TSIL D area:

- 21% of the polygons matched when compared as Es and P or U terrain.
- 6% of the polygons did not match (polygons were identified as Es but classified as stable in the terrain mapping)
- 70% of the area was identified in the terrain mapping as P or U polygons but had not been classified as Es in the ESA mapping.
- 2% had no Es classification but were identified as part of either P/S or S/P polygons.

Comparison of TSIL D data and ESA data



This comparison suggests that while one-fifth of the polygons match, a significant area has been identified as being at least potentially unstable. This discrepancy is most likely caused by different evaluation criteria, it may also be indicating that the TSIL D is overconservative on the classification.

Potentially unstable in operable (including alternate operability) areas

Excluding the inoperable areas, the TSIL D mapping identified 14,822 ha as being potentially unstable (includes polygons classes as P, P/S and P/U), whereas the ESA mapping finds only 3462 ha in Es areas (excluding those which overlap with unstable terrain polygons).

As previously noted, the mismatch of potentially unstable terrain and Es mapping may be a result of conservative terrain mapping, However, the TSIL mapping is the information we use for the majority of our operational decisions.

Review of logging in TSIL D area

The following tables summarize terrain stability information and past logging and their relationship in the area within TFL 3 mapped with TSIL D mapping. Overall in the operable (includes alternate operability) areas, there is approximately an even split between stable and potentially unstable, with a very minor component of unstable area. In the recently logged areas (table 2), the ratio between the harvesting by stability classes is very similar to what exists in the entire operable TSIL D area (i.e. 55%/44% split S to P terrain stability). When older logging is included (either the last 20 years or last 40 years), the ratio is swayed slightly towards the stable ground but there is still approximately one third of the logging occurring in potentially unstable areas.

	arison of logging b ate TSIL D area	y terrain stability o	class within entire
Total Area (ha / %)	S; S/P area (ha / %)	P; P/S; P/U area (ha / %)	U; U/P area (ha / %)
Entire TSIL D ope	er/alternate area		-1
35576 / 100%	19754 / 56%	14822 / 42%	1001 / 3%
Stands 0-40 years	old		
7372 / 21%	5000 / 14%	2297 / 6%	76 / < 0.5%
Stands 0-20 years	old		
4972 / 14%	3351 / 9%	1584 / 4%	37 / < 0.5%
Recently logged sta	ands (~NSR)		1011 0070
994 / 2.8%	552 / 1.6%	438 / 1.2%	5 / ~ 0%

Table 2: Comp periods logging	arison of logging l within the TSIL	oy terrain stability c D mapped area	lass for specified
Total Area (ha / %)	S; S/P area (ha / %)	P; P/S; P/U area (ha / %)	U; U/P area (ha / %)
Stands 0-40 years	old		
7372 / 100%	5000 / 68 %	2297 / 31%	76 / 1%
Stands 0-20 years	old		
4972 / 100%	3351 / 67%	1584 / 32%	37 / <1%
Recently logged st	ands (~NSR)		101111111111111111111111111111111111111
994 / 100%	552 / 55%	438 / 44%	5 / 0.5%

While this review does not specifically address the netdown factor it does identify that the area classified as potentially unstable within the TFL is an important component of our current harvesting operations. Thirteen percent is being suggested as the netdown factor for the TSIL B class IV terrain polygons (as per the IFPA base case) and it is recognized that TSIL D polygons tend to be more general and conservative than higher level terrain mapping. For this reason, and it recognition of the amount of potentially unstable ground that is included in our harvesting 10% netdown being suggested as appropriate.

Operable areas where no TSIL mapping exits

Within the operable and alternate operability landbase, there is 17.9 ha in Es1 and 32.8 ha in Es2 which is not included in either the areas mapped with TSIL B or D mapping.

Management Plan (MP) #9 set the Es netdowns at less than those used in TSR I for the TSA, I believe this is because it was felt that there was more performance in the TFL on the areas identified as sensitive soils. The operable area still remaining unmapped from a terrain stability perspective is not significant and I do not see a need to change the netdown factors from those used in MP 9.

IFPA base case

Greg Rowe explained his concern with the use of the TSIL D mapping in IFPA base case, which was the broad "P" polygons and belief that this mapping may be far too general/conservative. Whereas the TFL has some large P polygons, I believe that the best data for the timber supply analysis is that which is being used operationally and then to set appropriate net down factors.

Netdown comparison between various analyses

Terrain netdowns from IFPA Base Case - Outside CWS

From TSIL A – C mapping:

 $\begin{array}{c} V-80\%\\ IV-13\% \end{array}$

From TSIL D mapping:

U - 60%

P - 0 % (use Es mapping)

From ESA Soil mapping: ESA soil mapping used for areas other than those mapped with TSIL A – C mapping or those mapped as "U" polygons in TSIL D mapping.

Es1 - 90%

Es2 - 20%

Terrain Netdowns from MP 9 TFL 3:

Es1 - 80%

Es2 - 10%

Proposed Netdowns for MP 10 TFL 3:

From TSIL B mapping:

V-80%

IV - 13%

From TSIL D mapping:

U and U/P - 60%

P; P/S; P/U - 10%

S; S/P - 0%

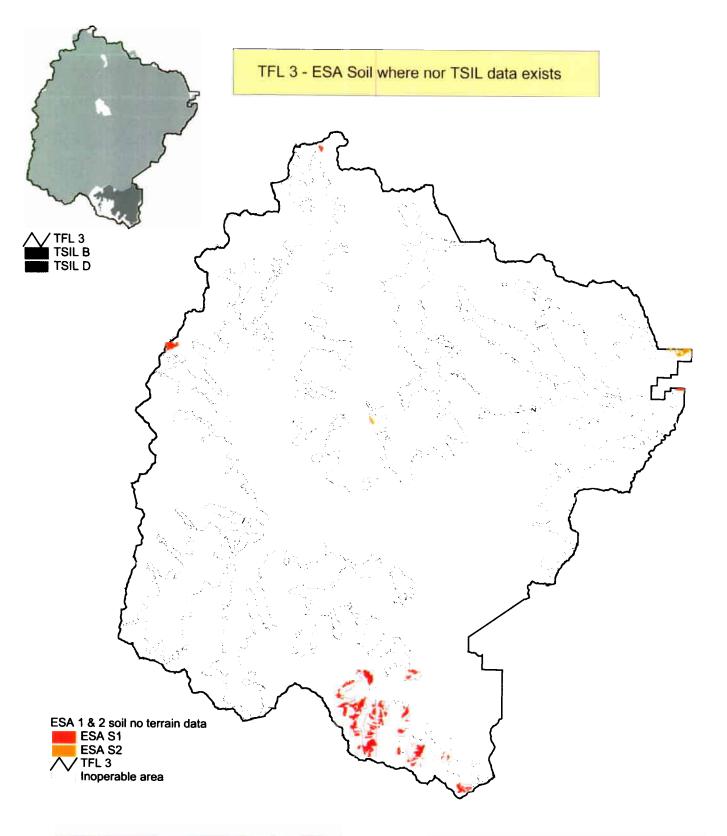
Only use Es mapping where no TSIL B or D exists.

Es1 - 80%

Es2 - 10%

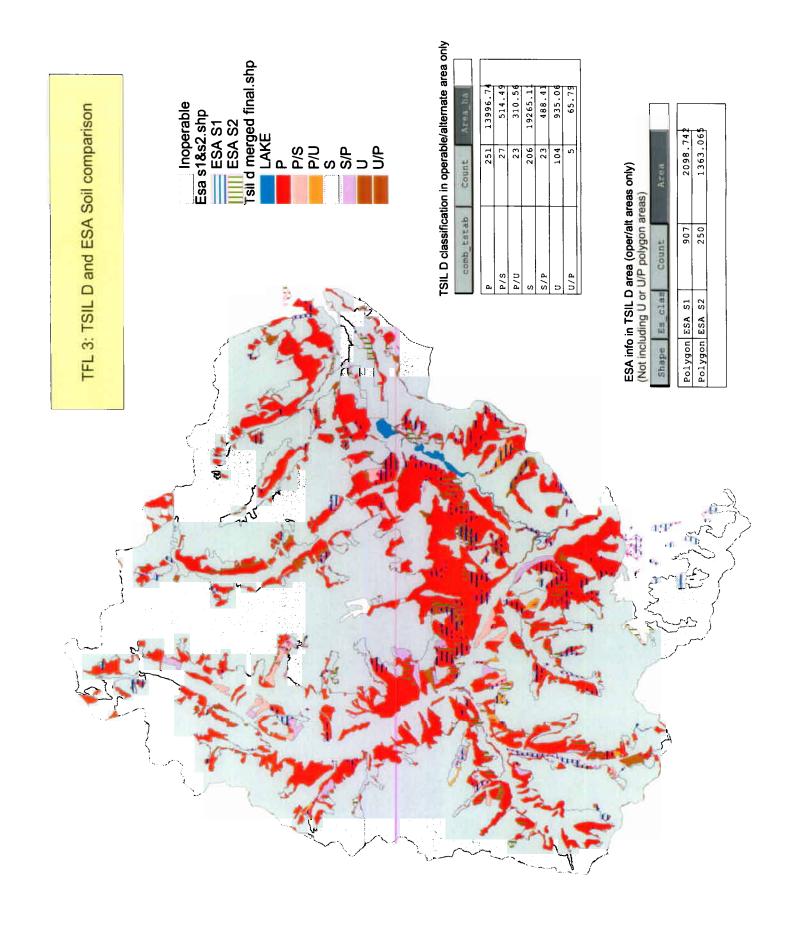
Attachments

- 1. Map: Identification of Es areas where no TSIL mapping exists
- 2. Map: TSIL D and Es comparison
- 3. Document: Comparison of TSIL and ESA data



Polygon	ESA S1	151	391.54
Polygon	ESA S2	17	41.16

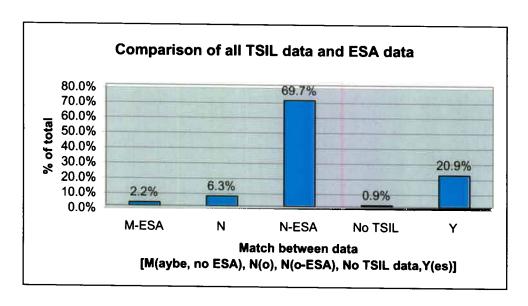
24	non -	- OPER	Corne	TNO E
Polygon	ESA S1	ALT	8	12.619
Polygon	ESA S1	INOP	2	373.720
Polygon	ESA S1	OPER	3	5.203
Polygon	ESA S2	ALT	1	3.742
Polygon	ESA S2	INOP	1	11.410
Polygon	ESA S2	OPER	1	26.007



Comparison of TSIL B and D and ESA Soil Data

Summary of data comparison

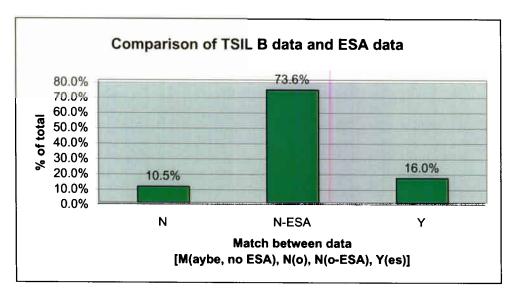
Match	Area_ha	% of total
M-ESA	1074.86	2.2%
N	3079.84	6.3%
N-ESA	34146.20	69.7%
No TSIL	425.11	0.9%
Υ	10236.55	20.9%
Total	48962.56	100.0%



Comparison of TSIL B and ESA Soil Data

Summary of data comparison

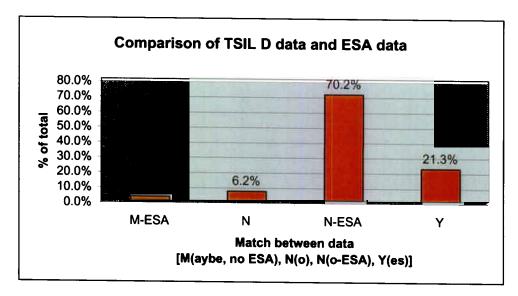
Match	Area_ha	% of total
N	224.95	10.5%
N-ESA	1578.24	73.6%
Υ	342.61	16.0%
Total	2145.80	100.0%



Comparison of TSIL D and ESA Soil Data

Summary of data comparison

Match	Area_ha	% of total
M-ESA	1074.41	2.3%
N	2854.82	6.2%
N-ESA	32568.48	70.2%
Υ	9893.94	21.3%
Total	46391.65	100.0%



Comparison of TSIL and ESA Soil data

TSIL_Esoil	TSIL/ESA MATCH	AREA_HA
P/S_	M-ESA	81.51
P/S_	M-ESA	101.40
P/S_	M-ESA	346.48
S/P_	M-ESA	0.00
S/P_	M-ESA	18.99
S/P	M-ESA	81.93
S/P	M-ESA	444.10
II_ESA S1	N	0.45
II_ESA S1	N	1.55
III_ESA S1	N	15.66
III ESA S1	N	144.32
III_ESA S1	N	52.25
III_ESA S2	N	
III_ESA S2	N	2.05
III_ESA S2	N	0.20
S ESA S1		8.47
	N N	142.51
S_ESA S1	N	1623.40
S_ESA S1	N	342.52
S_ESA S2	N	82.30
S_ESA S2	N	297.16
S_ESA S2	N	366.93
P/U	N-ESA	0.52
P	N-ESA	22.54
U/P	N-ESA	0.17
U	N-ESA	5.01
IV_	N-ESA	44.27
IV_	N-ESA	133.73
IV_	N-ESA	1237.04
P/U_	N-ESA	33.41
P/U_	N-ESA	1212.20
P/U_	N-ESA	150.82
P_	N-ESA	10343.93
P_	N-ESA	1323.80
P	N-ESA	13236.22
U/P	N-ESA	1.33
U/P	N-ESA	241.22
U/P	N-ESA	63.34
U_	N-ESA	115.53
U	N-ESA	5291.07
U	N-ESA	527.37
V	N-ESA	0.01
V	N-ESA	11.92
V	N-ESA	151.27
_ESA S1	NO TSIL	0.00
_ESA S1	NO TSIL	12.62
_ESA S1	NO TSIL	369.29
_ESA S1	NO TSIL	
_ESA S2	NO TSIL	3.40
_ESA S2	NO TSIL	3.74
_ESA S2 _ESA S2	NO TSIL	11.41
_ESA SZ IV_ESA S1	Y	24.65
IV_LOA 3 I		47.74

Comparison of TSIL and ESA Soil data

		Total	48962.56
V_ESA S1	Υ		26.65
V_ESA S1	Υ		7.09
V_ESA S1	Y		0.04
U_ESA S2	Y		49.70
U_ESA S2	Y		34.20
U_ESA S2	Y		16.27
U_ESA S1	Y		192.69
U_ESA S1	Ý		1472.54
U_ESA S1	Ý		33.52
U/P ESA S2	Ý		0.58
U/P_ESA S2	Y		0.71
U/P_ESA S1	Y	•	0.54
U/P_ESA S1	Y		38.24
U/P_ESA S1	Ÿ		0.00
S/P_ESA S2	Y	Fig. 1	21.10
S/P_ESA S2	Y		1.30
S/P_ESA S2	Ÿ		0.14
S/P_ESA S1	Y	70.	3.68
S/P_ESA S1	Y		19.89
S/P_ESA S1	Y		0.41
P_ESA S2	Y		761.98
P_ESA S2	Υ	1	374.30
P_ESA S2	Y		88.80
P_ESA S1	Y		1100.03
P_ESA S1	Y	,	4663.03
P_ESA S1	Υ	******	330.63
P_ESA S1	Υ	41	0.00
P/U_ESA S2	Y		8.57
P/U_ESA S2	Ϋ́		20.62
P/U_ESA S2	Υ		11.58
P/U_ESA S1	Y	75	75.44
P/U_ESA S1	Y		398.24
P/U ESA S1	Y		30.75
P/S_ESA S2	Y		15.34
P/S_ESA S2	Y		23.77
P/S_ESA S2	Y		6.13
P/S_ESA S1	Ÿ		37.46
P/S_ESA S1	Y		34.20
P/S_ESA S1	Y		27.56
V_ESA S2	Y		25.65
V_ESA S2	Y		2.20
IV_ESA S1 IV_ESA S2	Y		3.26
VESAS	Υ		57.54

APPENDIX VII: LETTERS RECEIVED DURING COMMENT & REVIEW PERIOD, INCLUDING SLOCAN'S RESPONSES

Includes viewing list from Slocan office (no signatures on village office list).

There were three letters received from members of the public letters. These letters and SFP's responses are not included in electronic version (.pdf) of the plan. These letters are available in the copy of the plan at Slocan's office and those copies sent to the Ministry of Forests (Castlegar, Kamloops & Victoria).



File: 19710-30/TFL 3

FB 19 100

Kathy Howard
Planning Forester, Slocan Division
Slocan Forest Products Ltd.
705 Delany Avenue
Slocan, British Columbia
V0G 2C0

Dear Kathy Howard:

In accordance with paragraph 2.24 (a) of the Tree Farm Licence (TFL) 3 licence agreement, I am providing the following comments on your draft Management Plan (MP) 10 (2003 – 2008). The comments provided are for your consideration in the development of the proposed MP 10 that will be submitted to the Chief Forester for approval.

Section 1.1 Description of TFL

The TFL operable land base determination provided in Table 4 of the TFL MP 9 Information Package is in variance with the stated estimate of 39,000 hectares considered as operable for harvesting timber. MP 9 indicated that the current timber harvest land base, for conventional and non-conventional areas, was estimated to be 28,016 hectares. This variance needs to be reconciled.

Section 2.0 Planning

It would be appropriate that Slocan Forest Products Ltd. (SFP) commit to incorporate the intent and comply with the requirements of the Kootenay Boundary Higher Level Plan (KBHLP) order and consider the landscape unit (LU) strategies and direction.

Section 4.1.1 AAC and Partition Cut

The Chief Forester in this allowable annual cut (AAC) determination letter expected the distribution of performance to be monitored and reported by SFP on an annual basis and at the time of the next timber supply analysis. It is therefore appropriate for SFP to acknowledge the commitment to annual reporting in this regard.

Section 4.1.2 Harvest Methods

A harvesting report has been included within past Annual Reports produced for the TFL. SFP should recognize the Annual Report as a summary performance report within the MP.

Section 4.2.6 Cultural Heritage Resources

The Aboriginal Archaeological Values section makes reference to significant aboriginal findings near Little Slocan Lake. In order to protect first nation's interests I believe it would be best if any specific reference to aboriginal site findings were deleted.

Section 4.3.5 Aboriginal People

The TFL licence agreement will be replaced within the time period covered off by MP 10. First Nation consultation prior to the TFL agreement replacement will require active participation from SFP. As such, I feel it is appropriate to expand this section in this regard.

Section 4.5.1 Disease Management

The White Pine Management Plan that was incorporated into MP 9 (Appendix V) is not included in MP 10 or referenced as a guiding document. Unless replaced by more recent guidelines and/or its value discounted I feel its reference or inclusion is still appropriate.

Section 4.6 Silviculture

It should be noted that SFP completed a Silviculture Strategy (Type 2) investment analysis in March of 2002. This guiding document should be referenced in the appropriate silviculture sections and included in the appendices.

If you have any questions regarding these comments please direct them to Bernie Peschke. Timber/Issues Forester, at (250) 354-6280.

1//

Yours truly,

Vera Quaroni

Acting Regional Manager

pc: Larry Pederson, Chief Forester, Ministry of Forests, Victoria
Gary Townsend, Director, Timber Supply Branch, Ministry of Forests, Victoria
Charlie Klasen, Timber Tenures Forester, Resource Tenures and Engineering Branch, Victoria
Brian Simpson, Disctrict Manager, Ministry of Forests, Arrow Forest District

SLOCAN GROUP Slocan Forest Products Ltd. Slocan Division 705 Delany Avenue Slocan, British Columbia Canada V0G 2C0 Fax (250) 355-2168 Tel. (250) 355-2100

May 1, 2003

Ministry of Forests Southern Interior Forest Region 515 Columbia Street Kamloops, BC V2C 2T7

Attention: Bernie Peschke

RE: TFL 3 – Management Plan #10 Response to Nelson Forest Region letter of February 10, 2003

Dear Bernie:

The following is SFP's response to the region's February 10, 2003 letter regarding the Draft Management Plan #10 for TFL 3:

Section 1.1 Description of TFL

The text in Management Plan (MP) #10 is referring strictly to area identified through the 1996 operability mapping and includes harvestable and non-harvestable areas. The Management Plan #9 info package area is based on the timber supply analysis net down logic and excludes areas such as riparian, NSR, deciduous.

The wording in the MP 10 document has been clarified.

Section 2.0 Planning

The Kootenay Boundary Higher Level Plan Order (KBHLPO) is a legal document, as such it should not be necessary to commit to its content. It was identified as information used in the development of the MP and other TFL planning processes.

The wording in the MP has been modified to clarify intent.

Section 4.1.1 AAC and Partition Cut

Identified the Annual Report as the mechanism for reporting on partition cut harvested volume (as per agreement in 2002 with Arrow Forest District).

As per our TFL licence document, Annual Reports are still done on request of the Regional Manager. Our partition volume is negligible at this time and the agreement with the district is that the Annual Report is the reporting mechanism. I believe that the partition volume is also reviewed as part of the cut control process.



Section 4.1.2 Harvest Methods

Section 4.1.1 of the MP has identified the Annual Report as a summary document for yearly harvesting and silviculture activities.

Section 4.2.6 Cultural Heritage Resources

We were vague enough regarding the location of aboriginal archaeological findings that we believe the wording should not be modified. It provides sufficient information so that interested parties (either ourselves or other resource users) have indication of the general area where aboriginal history exists and any activities should consider this information. We have not had a concern raised by a First Nations group regarding this information.

No change to has been made to the document.

Section 4.3.5 Aboriginal People

This section has been expanded to include mention of recent discussions with First Nations groups.

Section 4.5.1 Disease Management

Added reference to how we are utilizing information into our forest management from and the existence of the White Pine Management Plan – TFL #3.

Section 4.6 Silviculture

Added a discussion regarding the objectives and results of the Type 2 Silviculture Strategy completed in March 2002. Did not include the strategy as an appendix but indicated that it was available at SFP's office, I believe it is also available at the district and regional offices.

I trust that we have addressed your comments. If you have any questions please contact me at (250) 355-2100.

Yours truly,

SLOCAN FOREST PRODUCTS LTD

Kathy Howard, R.P.F. Planning Forester

K. Howard

Kathy Howard

From:

"Kathy Howard" < khoward@slocan.com>

To: Cc: "Guido, Jim FOR:EX" < Jim.Guido@gems9.gov.bc.ca> "Bernie Peschke" <Bernie.Peschke@gems1.gov.bc.ca>

Sent:

Thursday, May 01, 2003 2:13 PM

Subject:

Re: further MP #10 comments

Jim.

Following are SFP's responses to comments your staff made in regards to Draft Management Plan #10 for TFL 3. These responses will be forwarded onto Bernie Peschke in the submission of the proposed Management Plan:

- 1. Section 3.0: It is understood that legal objectives for UWR will be established in the near future, however we believe that operational management objectives may still be a valued tool. Legal objectives tend to be broad and non-site specific. The text will not be altered.
- 2. Section 4.2.3: Good comment. No changes made to text as strategic tone in document is OK.
- 3. Section 4.2.8: The UWR linework shown is the information developed under an FRBC study by SFP and accepted by MWALP in 2001 (until better information is made available).
- 4. Section 4.2.8: Avalanche mgmt areas for grizzly habitat: MP text has been modified to include reference to restricted harvest on one or both sides of avalanche areas utilized by grizzly bears.
- 5. Section 4.5.1: Have modified MP to include a commitment to prune natural white pine where they have been utilized to meet stocking standard numbers.

am just finishing up the final plan and am hoping to have the plan sent off either tomorrow or Monday.

Kathy

Kathy Howard, RPF Planning Forester

Slocan Forest Products Ltd - Slocan Division ph: (250) 355-2119 or 2100

--- Original Message

From: "Guido, Jim FOR:EX" < Jim.Guido@gems9.gov.bc.ca>

To: "Peschke, Bernie FOR:EX" < Bernie Peschke@gems1.gov.bc.ca>; < khoward@slocan.com>

Sent: Thursday, November 28, 2002 2:11 PM

Subject: further MP #10 comments

- > Brief comments from George and Tara:
- > section 3.0 page 4 -legal objectives for UWR will be established in the
- > section 4.2.3 page 7 -no legal limits for PAS but should be minimized;
- > limits for dispersed are regularily exceeded
- > section 4.2.8 page 10 -UWR map, is this HLP linework or can the new lines
- > be used? Avalanche mgmt areas HLP says both sides but one side has been
- > approved on occasion
- > section 4.5.1 page 14 -white pine, should commit to pruning where natural
- > pw is accepted

> Regards,

Jim Guido, RPF
 Manager, Resource Development and Planning
 Arrow Forest District, (250) 365-8600

Tom Gaines 3279 Little Slocan South Winlaw, BC V2G 2J0

Telephone: (250) 226 - 7309

January 12, 2003
Slocan Forest Products Ltd.
705 Delany Ave.
Slocan, BC
V0G 2C0

Attention: Kathy Howard RFP

Thank you for this opportunity to comment on Draft Management Plan #10 for Tree Farm License #3.

ISSUE: Conservation Of Non-Timber Values And Resources

An emerging issue within TFL3 is noise associated with the mainline road running up through the Little Slocan River Valley. Since mainline road improvements and recent logging adjacent to the mainline (winter 2000 –2001), noise from traffic on the road is affecting the quality of ours lives.

For the people who live in this valley, the noise is intrusive and excessive. In the coming years, there is a <u>high</u> potential that traffic along the mainline will increase and may shift from sporadic traffic patterns to one with potentially constant traffic. Something must be done now. Simple solutions are available, limited in cost and a demonstrable way for Slocan Forest Products to show consideration for the community. Some ideas include:

- Establish a partial harvest buffer area adjacent to the mainline of sufficient width and density to shield road noise
- Remediate the existing problem areas by a tree/shrub planting and fertilization program.
- Establish a policy of noise abatement in areas affecting the public.
- Amend your road-use agreements to consider noise, as well as maintenance and safety.

It is my hope that Slocan Forest Products will address this issue in this management plan.

Thank you for your consideration Sincerely,

Jom Lamin

Tom Gaines

Slocan Forest Products Ltd. Slocan Division 705 Delany Avenue Slocan, British Columbia Canada V0G 2C0 Fax (250) 355-2168 Tel. (250) 355-2100

April 28, 2003

Tom Gaines RR #1 Winlaw, BC V0G 2J0

RE: TFL 3 - Management Plan #10

Dear Tom.

Thank you for your letter of January 12, 2003 regarding road noise and use on the mainline in TFL 3, we appreciated your suggestions.

I particularly liked the suggestion of tree/shrub planting program, as Slocan attempts to plant our logged areas promptly - in this instance some planting was done last year and the remainder is planned for this year. On this particular area we are planting Douglas-fir, Larch and Lodgepole Pine which are all faster growing species. Unfortunately, much of the southern end of the TFL mainline area is within a domestic watershed so fertilization is avoided. I will suggest to our silviculture people that brushing along the mainline should be avoided as well to help with a noise buffer.

It is difficult to manage all situations and as you are across the river, you were not in our direct thoughts when we were doing the road upgrades. The improvements that we made to the mainline a couple of years ago were intended to enhance the safeness of the road for all the users, both industrial and public. Unfortunately, changes often have multiple effects and not all of them positive. I am sorry that these improvements had a negative effect for you.

We are going to discuss with our truck drivers to see whether it would be possible for them to avoid the use of their engine brakes on the stretch of road where the new cutblock is. Hopefully this would reduce one of the forms of road noise. We will also notify Crystal Graphite Corp of your concern, as they are the other main industrial user, so that they are aware of the noise issue and hopefully they can work together to improve the situation.

If it would help your particular situation, I could also arrange for some seedlings to be available if your were interested in planting some on your property. This will not solve the immediate noise problem but may be beneficial for future changes within the TFL. Please contact Pat Cutts in our office (355-2100) in early May if you are interested in getting some seedlings.

Yours truly,

SLOCAN FOREST PRODUCTS LTD.

SLOCAN DIVISION

Kathy Howard, R.P.F.

L. Howard

Planning Forester

Kenyon J. McGee P.O. Box 11 Winlaw, BC V0G 2J0 (250) 226-7615 January 8, 2003

Slocan Forest Products Ltd. 705 Delany Avenue Slocan, BC V0G 2C0

Attention: Kathy Howard, R.P.F.

Dear Ms. Howard:

RE: Tree Farm Licence #3 - Draft Management Plan #10

Thank you very much for your provision of an invitation to view the draft management plan (MP) #10 for Tree Farm Licence (TFL) 3 - Little Slocan.

I understand that the purpose of this plan is to describe strategic forest management objectives and to discuss how you are addressing those objectives.

A review of the plan indicates that a couple of factors need to be taken into account that will specifically affect me and my neighbours as residents of the Little Slocan River valley. The first issue is noise along the Slocan main haul line which runs from Slocan City to Passmore. This main line is being used more and more by logging traffic and I believe a couple of concerns need to be addressed.

Firstly, the cutting done 2 years ago along the main line opposite the residences located along the Little Slocan Road South has resulted in the removal of buffer trees along the main line. This has of course increased the noise level considerably. I believe that two factors need to be taken into account in your management plan to address this issue. First, will you please advise as to what plans are in the works for replanting a vigorous stand of replacement trees to act as a noise buffer along the north side of your main haul line down the Little Slocan River. Secondly, can you please advise as to requirements that you will make and steps you will take to enforce these

requirements, to ensure that all vehicles employed by contractors or Slocan itself, will meet a standard noise control level which will maintain a low level of noise from these vehicles, therefore not ruining the neighbourhood with loud engine sounds.

These two items are very important and I look forward to your early advice as to what steps you can take to address these in your strategic plan.

The final issue is one with regard to changes to the Forests Practices Code placing enforcement and adherence in your hands. What exactly will be your policy in regard to found infractions of the Forests Practices Code. I ask for general information at this point as to what steps you plan on taking as the R.P.F. in charge, to ensure that any infractions are dealt with. For example, I understand that the large clearcut located opposite my home in the Little Slocan valley and in the eastern reaches of the Airey drainage was actually slated as a partial retention cut, however turned into a clearcut. This appears to me to be a clear infraction of the Forest Practices Code but I gather that it has been left to you to enforce any requirements for dealing with this infraction. As an example of how things will go in the future, what can you tell me about steps you have taken to address that breach of the stated plan.

I look forward to your early advice in regard to these matters.

Thank you very much for your time and attention to this matter.

ml

I remain.

Yours truly,

Kenyon McGee

KM/II

cc:

Ted Evans

Ministry of Forests, Arrow District Office

Castlegar

SLOCAN GROUP Slocan Forest Products Ltd. Slocan Division 705 Delany Avenue Slocan, British Columbia Canada VOG 2C0 Fax (250) 355-2168 Tel. (250) 355-2100

April 28, 2003

Kenyon McGee PO Box 11 Winlaw, BC VOG 2J0

RE: Tree Farm Licence #3 - Management Plan #10

Dear Mr. McGee,

Thank you for your letter of January 8, 2003 regarding your concerns with operations within TFL 3. There were two main issues raised in your letter; traffic noise on the Little Slocan mainline and enforcement of forest practices under the new legislation.

Two activities happened along the Little Slocan mainline which has affected the traffic noise; the road was widened to improve the road user safety and harvesting of a cutblock that straddled the road occurred. In regards to the cutblock, it was partially planted last year and will be completed this year with a mix of Douglas-fir, Larch and Lodgepole Pine seedlings. As this area has nutritionally good soil, I would expect that brush species will also establish themselves. While we will actively manage the brush species within the block, I am suggesting to our silviculture supervisor that we allow the taller shrub species to remain along the road edge to help create more of a road noise buffer. The other issue we will discuss with our truck drivers is whether they can avoid the use of their engine brakes on the steeper portion of the mainline that is within this block. As long as there is not a safety issue, this should reduce the noise from this road. As Crystal Graphite Corp is also an industrial user of this road, I will also ask that they discuss this subject with their truck drivers.

You also had a concern with enforcement of forest practices under the new legislation. The changes in the legislation (Forest Practices Code versus Forest and Range Practices Act) has not removed the enforcement responsibility and authority from the Ministry of Forests. In fact, I believe that they are now more focused on enforcement. However, Slocan is committed to ensuring that they meet or exceed the requirements set out by government for practices on crown land. One way we have shown this commitment is through our environmental management system which not only tracks all possible environmental concerns but more importantly communicates to our staff and contractors why various environmental measures are necessary.

Your specific example of a forest practices infraction I believe relates to the same cutblock which is earlier mentioned in this letter, the one that straddles

the main road. In the forest development plan this block was described at different times as either a group retention area or the newer Forest Practice Code (FPC) term "partial cutting" area. Partial cutting is defined, in the FPC, as a number of silviculture systems including shelterwood, retention systems and clearcut with reserves, this block utilized all of these silviculture systems within it final harvest boundaries.

I hope that I have addressed the issues you raised in your letter.

Yours truly, SLOCAN FOREST PRODUCTS LTD SLOCAN DIVISION

Kathy Howard, R.P.F. Planning Forester

K. Howerso (

January 8, 2003 Slocan Forest Products Ltd. 705 Delany Ave. Slocan, BC V0G 2C0

Attention: Kathy Howard RFP

Given the recent changes in the Forest Practices Code (FPC), it seems appropriate that Management Plan # 10 would address your management direction in relation to the new results based Forest and Range Practices Act. I believe that few in the community understand what the new results based code means. By addressing this issue in detail Slocan Forest Products (SFP) can provide much needed information to the community.

Will SFP work to follow the spirit and intent of the FPC. For example, recently I became aware of a proposed harvest block in Embro Creek. I noticed that the wildlife tree reserves were in actuality talus slopes (rocks) and contained no trees. While these "reserves" may follow the law, do they in actuality follow the Codes spirit and intent?

Thank you Sincerely

Bill Steele RR#1 Winlaw, B.C. V0G2J0

Slocan Forest Products Ltd. Slocan Division 705 Delany Avenue Slocan, British Columbia Canada VOG 2C0 Fax (250) 355-2168 Tel. (250) 355-2100

SLOCAN GROUP

April 28, 2003

Bill Steele RR #1 Winlaw, BC VOG 2J0

RE: Tree Farm Licence #3 - Management Plan #10

Dear Mr. Steele,

I appreciated your letter of January 8, 2003 regarding our operations within TFL 3.

The changes in the legislation is causing a lot of community people to wonder how it will effect forest management. In my view, forest management will not negatively change, we will either manage to the same standards that the Forest Practices Code established or in some instances exceed those standards as newer and better practices are developed. I am not an expert in the new legislation, perhaps someone at the Ministry of Forests in Castlegar could provide a more precise answer, but I understand the new Forest and Range Practices Act sets out management objectives and then leaves it to forest managers to decide the best and most efficient way of achieving those objectives. The Ministry of Forests will be playing a key role, monitoring the companies' forest practices to ensure that they are meeting the objectives that have been set. I hope this somewhat explains the legislation changes.

To respond to your concern with the wildlife tree patches in the Embro Creek cutblock, I understand your unease. There are two wildlife tree patches (WTP) in this block; one about 2 hectares and another about 11 ha. The larger WTP encompasses a mosaic of rock and treed areas. I do not think this was the area that you were concerned with.

The smaller WTP is essentially a rock/talus area with a few trees dispersed throughout and along the edges. I initially agreed with you that this does not seem like an appropriate WTP. But then I discussed this issue with the staff person responsible for its establishment he explained that he identified this area as a WTP because he believed that these rocky, sparsely treed areas have good wildlife habitat qualities (for smaller mammals) and is representative of the surrounding area.

I hope this provides some answers to both your specific query and the broader question regarding changing forest legislation. Again thank you for taking the time to review the management plan document and to comment on our operations.

Yours truly,

SLOCAN FOREST PRODUCTS LTD.

SLOCAN DIVISION

Kathy Howard, R.P.F.

of the aid.

Planning Forester

TFL 3 Management Plan # 10 December 2002 – February 2003

Name	Community	
Rowen Two Feathers	Slocan.	
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