

WOODLOT LICENCE # W2031

WOODLOT LICENCE PLAN

First Term
2011 to 2021

PO Box 482
Ladysmith, BC V9G 1A4
E-mail: tamarix@shaw.ca
Phone: 250.245.4291

Authorized Licensee Signatures:

M. Chantal Blumel, RPF / James Dodd

Blumel /

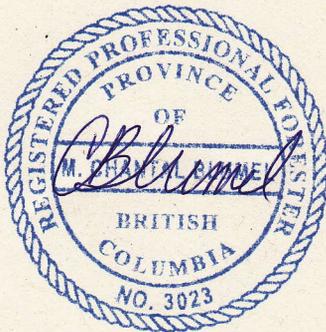
Date: *July 12, 2011*

M. Chantal Blumel, RPF

Registered Professional Forester
Signature

July 12, 2011

Date:



WOODLOT LICENCE # W2031

WOODLOT LICENCE PLAN

First Term
2010 to 2020

PO Box 482
Ladysmith, BC V9G 1A4
E-mail: tamarix@shaw.ca
Phone: 250.245.4291

Authorized Licensee Signatures:

M. Chantal Blumel, RPF / James Dodd

Date:

Registered Professional Forester
Signature

M. Chantal Blumel, RPF

Date:

TABLE OF CONTENTS

I. CONTENT FOR A WOODLOT LICENCE PLAN (WLP)	3
PLAN AREA	3
MAP AND INFORMATION	4
AREAS WHERE TIMBER HARVESTING WILL BE AVOIDED	7
AREAS WHERE TIMBER HARVESTING WILL BE MODIFIED	8
CONSERVING AND PROTECTING CULTURAL HERITAGE RESOURCES ...	10
WILDLIFE TREE RETENTION STRATEGY	12
MEASURES TO PREVENT INTRODUCTION OR SPREAD OF INVASIVE PLANTS	18
MEASURES TO MITIGATE EFFECT OF REMOVING NATURAL RANGE BARRIERS	19
STOCKING INFORMATION FOR SPECIFIED AREAS	19
PERFORMANCE REQUIREMENTS	19
SOIL DISTURBANCE LIMITS	19
PERMANENT ACCESS STRUCTURES	19
STOCKING STANDARDS	19
WIDTH OF STREAM RIPARIAN AREAS	20
WIDTH OF WETLAND RIPARIAN AREAS	20
WIDTH OF LAKE RIPARIAN AREAS	20
RESTRICTIONS IN A RIPARIAN RESERVE ZONE	20
RESTRICTIONS IN A RIPARIAN MANAGEMENT ZONE	20
WILDLIFE TREE RETENTION	21
COARSE WOODY DEBRIS	21
RESOURCE FEATURES	21
APPENDICES	22
II. SUPPLEMENTAL INFORMATION IN SUPPORT OF THE PROPOSED WOODLOT LICENCE PLAN	3387
1. REVIEW AND COMMENT	3487
a) <i>Advertising</i>	3587
b) <i>Referrals</i>	3687
c) <i>Copy of Written Comments Received</i>	3787
d) <i>Revisions Made as a Result of Written Comments Received</i>	3887
2. FIRST NATIONS CONSULTATION	3987
3. EXEMPTIONS	4087
4. RATIONALE IN SUPPORT OF PROPOSED ALTERNATIVE PERFORMANCE REQUIREMENTS	87

I. CONTENT FOR A WOODLOT LICENCE PLAN (WLP)

PLAN AREA

This plan covers the entire Woodlot Licence area.

This plan covers the entire 715.0ha area of Woodlot Licence W2031. W2031 is located in the northeastern part of Quadra Island between three protected areas – Small Inlet Marine Park and Octopus Islands Provincial Park to the north/northwest and Main Lake Provincial Park to the south. To the east it borders Woodlot Licence W1970 and the ocean (Okisollo Channel), and to the west it meets up with TimberWest TFL47 and Small Inlet Marine Park (Newton Lake).

This area is part of a takeback from TimberWest TFL 47. The last harvesting within the woodlot licence area was in the 1970's. The cutblocks were regenerated naturally following harvest.

GOVERNMENT OBJECTIVES

The broad objectives set by government are found in section 9 of the Woodlot Licence Planning and Practices Regulation (WLPPR) under the Forest and Range Practices Act (FRPA). Additional land use objectives, as well as any other objectives that may apply to the woodlot licence area are found in Section 10.

The entire woodlot licence W2031 area is within Special Management Zone #19 (SMZ19) identified in the Vancouver Island Land Use Plan (VILUP), a higher level plan.

The Campbell River Forest District has established a known scenic area within woodlot licence W2031 as identified on the map in Appendix IV, and visual quality objectives (VQOs) have been established by the District Manager (DM). The Order and Determination Rationale are included in Appendix IV.

The Woodlot Licence W2031 Management Plan also guides operations within woodlot licence W2031.

The WLP Schedule B (Crown) maps are located in Appendix I.

MAP AND INFORMATION

Information Item	Map	Text	N/A
Forest cover	X	X	
Topography; (unless exempted by DM)	X		
Location of streams, wetlands and lakes as shown on forest cover maps, terrain resource inventory maps and fish and fish habitat inventory maps.	X		
Riparian classification of streams, wetlands and lakes <u>if shown on maps</u>	X	X	
Identification of fish streams		X	
Biogeoclimatic zones and subzones (unless exempted by DM)		X	
Public utilities (transmission lines, gas & oil pipelines, and railways)			X
Existing roads	X	X	
Special Situations that may not Apply to the WL area			
Resource Management Zones, Landscape Units or Sensitive Areas		X	
Wildlife Habitat Areas (unless exempted by DM)			X
Scenic Areas	X	X	
Ungulate Winter Ranges			X
Community Watersheds			X
Fisheries Sensitive Watersheds			X
Community and domestic water supply intakes that are licensed under the Water Act and any related water supply infrastructures	X	X	
Contiguous areas of sensitive soils		X	
Temporary or permanent barricades to restrict vehicle access		X	
Private property within or adjacent to the woodlot licence area			X
Resource features other than wildlife habitat features and archaeological sites (unless the location of the resource feature is not to be disclosed)			X

Biogeoclimatic Zones and Subzones

The entire woodlot licence area is in the CWHxm biogeoclimatic subzone.

Resource Management Zones, Landscape Units or Sensitive Areas

The entire woodlot licence area is within Special Management Zone #19 (SMZ19) identified in the Vancouver Island Land Use Plan (VILUP), a higher level plan. The primary values of SMZ 19 are ecosection biodiversity and representation; coastal and shorelands wildlife values; and visual qualities, especially in association with marine recreation and major road corridors. The primary objectives of SMZ 19 are to protect biodiversity, visual resources, recreation/ tourism resources, wildlife, and fish. The maximum clearcut size within SMZ 19 is 5 hectares.

Scenic Areas

The District Manager (DM) has established the scenic areas and visual quality objectives (VQOs) for the Campbell River Forest District (CRFD), by authority of the Government Actions Regulation (GAR). A scenic area has been established within the W2031 woodlot licence area as identified on the map in Appendix IV, and VQOs have been established. The scenic area is associated with Okisollo Channel to the east of woodlot licence W2031. These known resources provide guidance for planning in W2031. The notices are found in Appendix IV and include the specific Order for the Establishment of Scenic Areas and Visual Quality Objectives for the Campbell River District as well as the Determination Rationale, which provides a detailed analysis. This WLP has taken appropriate measures to accommodate the requirements of the established VQOs. The VQO definitions are borrowed from the Forest Planning and Practices Regulation (FPPR) under FRPA. (See Appendix V for the definitions).

The addition of biodiversity reserves and scenic management areas that meet the specific geography and stand attributes of woodlot licence W2031 enhance the above strategy developed to meet the visual objectives. Specific objectives for the VQOs of retention, partial retention and modification have been addressed in the following sections: *Areas where Timber Harvesting will be Avoided*, *Areas where Timber Harvesting will be Modified*, and *Wildlife Tree Retention Strategy*.

Wildlife Habitat Areas (WHAs) and Ungulate Winter Ranges (UWRs)

There are no identified WHAs or UWRs within W2031.

However, in 2004 the Ministry of Environment (MOE) issued two Notices to Woodlot Licensees providing indicators for the winter survival of ungulate species, and for the survival of species at risk. No specific areas or species are currently identified within woodlot licence W2031. Biodiversity reserves have been established as identified in the sections *Areas where Timber Harvesting will be Avoided*, *Areas where Timber Harvesting will be Modified*, and *Wildlife Tree Retention Strategy*.

Community and domestic water supply intakes that are licensed under the Water Act and any related water supply infrastructures:

There is one licensed water supply designated within the general vicinity of woodlot licence W2031. It is within Octopus Islands Provincial Park, on Houston Creek, just north of the northeast boundary of woodlot licence W2031. Houston Creek leads to Okisollo Channel, and the water licence is designated for a work camp.

An unlicensed water supply intake is identified in the woodlot licence plan for woodlot licence W1970, adjacent to woodlot licence W2031.

The location of both these water intakes is shown on the map in Appendix I, and will be confirmed during development of woodlot licence W2031.

The woodlot licence holder will consult the water licensee regarding development which may affect water quality, as required under the Water Act.

Contiguous areas of sensitive soils:

There are no identified contiguous areas of sensitive soils in the woodlot licence area. Areas of sensitive soils will be identified and mapped concurrent with planning and development of the woodlot licence.

Temporary or permanent barricades that restrict vehicle access:

No temporary or permanent barriers to restrict vehicle access are identified on the map in Appendix I. Currently there is no vehicle access to the woodlot licence W2031 area.

There is only walk-in or ATV/dirt bike access to the woodlot licence area at the time of preparing this WLP, due to a pulled bridge over a fish creek along the only access road through TimberWest TFL 47.

The Management Plan for woodlot licence W2031 speaks to the long-term access plan.

Private property within or adjacent to the woodlot licence area:

There is no private property within or adjacent to the woodlot licence area.

Resource features other than wildlife habitat features and other features where the location must not be disclosed:

At the time of preparing this WLP, no resource features have been established within the woodlot licence area under the Government Actions Regulation (GAR) other than the known scenic area previously identified. There were also no resource features within the woodlot licence area that were made "known" by the DM under the regulations of the *Forest Practices Code of BC Act*.

AREAS WHERE TIMBER HARVESTING WILL BE AVOIDED

Timber harvesting will be avoided in the areas of woodlot licence W2031 as shown on the W2031 WLP Map in Appendix I. In addition, information in Table 1 on page 16 in the *Wildlife Tree Retention Strategy* section provides details that identify all of the dedicated reserves, their attributes, the biodiversity function and the related resource values being protected. Reserves are off-limits to timber harvesting except where identified in the *Wildlife Tree Retention Strategy*. Reserve areas are set aside for the following objectives:

- **Biodiversity** – Biodiversity reserves are shown on the map and have been created to protect habitat features for a variety of species. The reserves have been established as wildlife tree retention areas and contain valuable wildlife trees and associated structure consisting of old growth (>250 years old) with various species composition, and some surrounding second-growth as recruitment areas. Retaining the existing old growth forests is key to maintaining the biodiversity values of forests in the CWHxm biogeoclimatic subzone. Maintaining these reserves, and recruiting around them to enlarge existing and future old growth forests is one of the strategies to meet the biodiversity objectives set out in the VILUP for SMZ 19. VILUP suggests active recruitment of old seral forest attributes and ages in CWHxm forests. Additional recruitment of old growth will be concentrated in riparian areas.
- **Visuals** - A Visual Management Area (VMA) is shown on the map to protect the visual resource in this known scenic area along Okisollo Channel. The VMA consists of the minimum 30m no-harvest buffer along the shoreline within the Retention (R) VQO designated for this known scenic area. An additional 30m no harvest zone will be applied by the woodlot licensee to further protect the scenic resource. In woodlot licence W2031, as per SMZ 19 values/objectives, the forest resources along Okisollo Channel are key to maintaining the visual and marine recreational/tourism values of the area, as well as habitat for coastal wildlife species. Kayaking and boating are important uses of Okisollo Channel, and maintaining the visual integrity will help retain the recreation experience. The wildlife objective of SMZ19 pertains mainly to marine and coastal species, especially birds. Maintaining the visual integrity will also maintain habitat for these species and protect biodiversity values. Retaining the VMA will also accommodate the potential for trail construction.
- **Riparian Reserve Zones (RRZs)** – RRZs will have restricted harvesting except for the purposes within section 39 of the WLPPR. If additional streams requiring RRZs are discovered during operational planning, they will be protected with similar harvest constraints. Due to the scale of the WLP map, the RRZs are not represented separately on the map.
- The full Riparian Management Area (RMA) will be retained from harvest along the stream running north from Hummingbird Lake into Octopus Islands Provincial Park, to retain forested connectivity for various wildlife species. This is not represented on the map, but is a commitment within this WLP for woodlot licence W2031.

AREAS WHERE TIMBER HARVESTING WILL BE MODIFIED

Timber harvesting will be modified in designated areas of the woodlot licence as referred to on the W2031 WLP map in Appendix I and/or described below. There are six main areas and categories where harvesting will be modified to provide extra protection to recognized resource values. These are:

- The areas designated as Partial Retention (PR) or Retention (R) within the known scenic area adjacent to and visible from Okisollo Channel. These areas will be managed to reduce the visual impact of harvesting, and to maintain habitat. This excludes the VMA described in the *Areas where Timber Harvesting will be Avoided* section. Clearcut cutblocks will be kept small (<5ha) and natural in appearance; or a retention silvicultural system will be used.
- The areas designated as Modification (M) within the known scenic area. These areas will also be managed to reduce the visual impact of harvesting. Clearcut cutblocks will remain <5ha, and topography will be used to try to make the cutblock boundaries appear as natural as possible.
- Areas visible from Clear Lake (part of Main Lake Provincial Park). Although these areas are not identified as a known scenic area, cutblocks visible from Clear Lake will be harvested using a retention silvicultural system where practical, or if the terrain is suitable, a clearcut system. Clearcut cutblocks will be kept small (<5ha), and their appearance natural by utilizing existing topography to blend the boundaries. The boundaries of these areas will be determined as development continues.
- The area around the water intakes. These areas will be retained in as natural a state as possible. A no-harvest-zone may be utilized if appropriate.
- The areas adjacent to park boundaries. The objective is to maintain the integrity of the boundaries. Appropriate methods will be decided concurrent with development, and may include a 25m modified harvest buffer where practical.
- RMAs applied to streams, wetlands, lakes and fisheries sensitive zones within the woodlot licence area.
 - Riparian Management Areas (RMAs) consist of two parts – Riparian Reserve Zones (RRZs) and Riparian Management Zones (RMZs). Riparian Reserve Zones (RRZs) will generally be given a no-harvest designation. The exceptions are described in WLPPR s39. When a pre-existing road is located in a RRZ, and the road is not causing deleterious effects on the stream/wetland/lake values, then the road will be retained in its present location. Riparian Management Zones (RMZs) as described in WLPPR s36-38 can have modified harvesting prescribed on a site-specific basis determined by factors that will affect the protection of the stream, wetland or lake.

Unless exempted by the district manager, or the harvesting of a road clearing width is required, the woodlot licence holder is committed to retaining the following post harvest stand structure in riparian management zones:

The percentage of the total basal area within the riparian management zone specified in Column 2 will be left as standing trees at the completion of harvesting:

Column 1 Riparian Class	Column 2 Basal Area to be Retained Within Riparian Management Zone (%)
S1-A or S1-B stream	≥ 20
S2 stream	≥ 20
S3 stream	≥ 20
S4 stream	≥ 10
S5 stream	≥ 10
S6 stream	≥ 5
All classes of wetlands or lakes	≥ 10

The woodlot licence holder will ensure that the trees required to be left standing are reasonably representative of the spatial distribution and various sizes of trees in the riparian management zone, as it was before harvesting.

CONSERVING AND PROTECTING CULTURAL HERITAGE RESOURCES

Woodlot licence W2031 is within the traditional territory of the Cape Mudge (Wei Wai Kai) First Nation, Campbell River (Wei Wai Kum) First Nation, K'omoks First Nation, Homalco (Xwemalhkwa) First Nation, and Klahoose First Nation. Full digital copies of the draft WLP were sent to the above First Nations for review, as well as to the Laich Kwil Tach Treaty Society and the Nanwakolas Council Referrals Office. The Cape Mudge First Nation also received direct communication regarding the WLP. All the identified First Nations were invited to provide information in regards to traditional First Nations uses within the woodlot licence area. Refer to Supplemental Information, section 2, for applicable correspondence.

Consistent with the *Heritage Conservation Act*, care will be taken during all fieldwork associated with woodlot licence W2031 to recognize any archaeological evidence located within the woodlot licence area. Should archeological features be identified, operations will cease both at the identified feature as well as in the near vicinity of that feature. Affected First Nations and the Ministry of Forests, Lands and Natural Resource Operations (FLNR) will be contacted, and an appropriate management strategy will be developed cooperatively.

The following strategy is proposed to conserve and protect cultural heritage resources that are the focus of a traditional use by an aboriginal people and of continuing importance to them. This strategy applies to cultural heritage resources that are not protected under the *Heritage Conservation Act*.

The woodlot licence holder is committed to carrying out forest practices at a time and in a manner that is unlikely to damage or render ineffective identified cultural heritage resources (CHR). If specifically requested by affected First Nations, the licensee commits to discuss any current or future block specific operational plans at any time during the term of this WLP. The licensee is committed to working with any First Nations whose traditional territories are affected by this WLP in regards to resource use of the area. This includes First Nation requests for use of significant CHR such as traditionally used plants in the WLP area. Any information sharing requests by First Nations which may arise following approval of this WLP will be addressed by the licensee.

As a proactive measure, the following results and strategies are outlined below:

- **Information Sharing:**
 - **Result:** Maintain communication between First Nations and the woodlot licensee regarding CHR within the woodlot licence area.
 - **Strategy:** Provide copies of the draft WLP to the identified First Nations for review, and request information regarding traditional uses within the woodlot licence area. Ongoing information sharing regarding operational plans will continue following approval of the WLP when requested by First Nations. The licensee will share information with local First Nations upon request and be available for field reviews.

- **Western Redcedar (Cw):**
 - **Result:** Maintain present and future availability of this species that is used as a resource to make a variety of traditional pieces such as clothing, carvings, totem poles, baskets, and canoes.
 - **Strategy:** Cw will be planted on a site specific basis along with other ecologically suitable species within harvested cutblocks. As well, where operationally possible the understory Cw will be retained. Mature and old growth Cw will be assessed on a site specific basis for retention potential, and retained where practicable. Also, Cw will be retained where it is associated with other retention areas, such as biodiversity reserves; the VMA, and RMAs.

- **Traditionally Used Plants:**
 - **Result:** First Nations individuals will have continued free access to traditionally used plants (including those for medicinal or ceremonial purposes) such as, but not limited to, devil's club (*Oplopanax horridus*), cascara (*Rhamnus purshiana*), Pacific yew (*Taxus brevifolia*), Indian hellebore (*Veratrum viride*), salmonberry (*Rubus spectabilis*) and various *Vaccinium* species within the carrying capacity of the local ecosystem.
 - **Strategy:** If the woodlot licensee or a First Nations person identifies areas where culturally important, traditionally used, rare and/or valuable plants are located, and a First Nation asserting their traditional territory in the area expresses a requirement for the plant, it will be protected, where feasible, by a management strategy that mitigates the risk to the area. A no-pesticide use policy is implemented within this woodlot licence. The VMA, RMAs and biodiversity reserves distributed on the woodlot licence area represent various ecological types. These reserves may contain valuable plants for gathering opportunities. These reserves will provide ongoing support for cultural heritage resources.

WILDLIFE TREE RETENTION STRATEGY

The wildlife tree retention strategy for woodlot licence W2031 involves:

- retaining the existing old growth stands (>250 years) and recruiting around them to enlarge existing and future old growth forests;
- retaining a no harvest buffer within the known scenic area along Okisollo Channel;
- applying RMAs to streams, wetlands, lakes and fisheries sensitive zones;
- establishing smaller WTPs on a site specific basis concurrent with development;
- assessing individual old growth veterans scattered in some mid seral stands during the planning phase for retention potential.

The total area set aside in biodiversity reserves / VMA is 29.1ha (4.1% of the total woodlot licence area).

The area within RMAs (RRZs and RMZs) is anticipated to add another 48.4ha to the WTP total, which is 6.8% of the total woodlot licence area. This number is based on the Timber Supply Analysis Report (2007), and will be confirmed as the RMAs are established concurrent with development.

It is anticipated that smaller WTPs and retained individuals will contribute to the total percentage of the woodlot licence area within wildlife tree retention.

Retaining the existing old growth forests as identified in the Timber Supply Analysis Report (2007) is key to maintaining the biodiversity values of this area. There are scattered small patches of existing old growth (defined as those patches that are currently over 250 years of age). Maintaining these patches, and recruiting around them to enlarge existing and future old growth forests is one of the strategies to meet the biodiversity objectives set out in the VILUP for SMZ 19. Replacement of old growth will be concentrated on the existing old growth patches, and recruitment in riparian areas. VILUP suggests active replacement of old seral forest attributes and ages in CWHxm forests.

Wildlife tree patches (WTPs) and wildlife trees (WLTs) are one of the most valuable components of the strategy for conserving and enhancing stand level biodiversity. The management recommendations in the FLNR website "Wildlife Tree Management at the Stand Level" will be followed in woodlot licence W2031 with the consultation of the FLNR and Ministry of Environment (MOE). Identified wildlife species are managed through the establishment of large reserves (biodiversity reserves and the VMA as described in the section *Areas where Timber Harvesting will be Avoided*), smaller WTPs and individual WLTs within the operational area. Selection of these areas is based on stand structure, age, species composition, and other valuable indicators for wildlife habitat. Various ecosystems are included in the biodiversity reserves and VMA, representing many types present in woodlot licence W2031. There will be limited utilization of individual WLTs.

INDIVIDUAL WILDLIFE TREES

a) Species and Characteristics:

Generally, selection of trees for WLTs will be based on current Wildlife/Danger Tree Assessment procedures where all trees are classified between classes 1 and 9, based on the condition of that tree. Classes 1 and 2 are live trees, classes 3-7 are dead

standing trees in various stages of decay, and classes 8 and 9 are dead fallen trees. By default, tree classes 4-9 generally have no merchantable log value and will be retained where safe to do so. These are commonly the trees which exhibit active use by wildlife. Tree class 3 are recently dead but are sound. These trees will be selected where safety permits. Tree classes 1 and 2 are live trees with class 1 being healthy and class 2 being unhealthy. Class 1-3 trees provide for future WLT value, as those trees will potentially deteriorate in quality and become higher tree classes. It is important to identify a variety of tree classes for WLTs to provide biodiversity and habitat values for a variety of species over time.

Good characteristics of WLTs include some or all of the following features:

- Greater than 15m in height;
- At least 30cm in diameter for large cavity nesters;
- Smaller diameter for small cavity nesters;
- Broken tops;
- Some intact bark and branches;
- Forks, crooks and/or large brooms;
- Active use;
- Proximity to other resources (riparian);
- Windfirmness.

Douglas fir (Fd), western hemlock (Hw), western redcedar (Cw), and red alder (Dr) are the most common tree species in W2031. Less common tree species are western white pine (Pw), lodgepole pine (Pl), sitka spruce (Ss), western yew and big leaf maple (Mb). Assessments for wildlife tree potential will be made on a site specific basis, with an emphasis on the traditional high value wildlife species of Fd and Cw.

In the extensive stands of mature second growth present in W2031, high value individual wildlife trees are ones with current wildlife presence or other indicators suggesting decay or structural potential for future use. Some stands have a mixed component of conifer and Dr that allow targeting the two types for retention. The conifers provide longer term supply of wildlife trees, and the Dr are excellent for immediate use if they are dead or declining.

W2031 has a variable disturbance history, with extensive logging of the old growth stands starting in the early 1900's and continuing to the 1970's. Fires have occurred after harvesting, either wild or planned. Some of these fires burned remnant stands, leaving areas of mature second growth (61-80 years) with scattered veterans remaining as both live and dead trees. These areas may provide larger diameter veteran Fd and Cw that are suitable wildlife habitat for a variety of species such as large nesting birds or potential bear or small mammal dens. Riparian interface areas (e.g. lakeshores) provide additional wildlife values for individual trees.

These old growth trees are frequently class 2 wildlife trees, with broken tops and evidence of fungal fruiting bodies indicating the presence of heart rot, a valuable wildlife tree characteristic. These trees have habitat value for primary cavity-excavating woodpeckers and the numerous species of secondary cavity bird and mammal users. The thick sloughing bark on the Fd trees and the burned trunks of Cw trees are ideal for bats and some bird species, and can be used for nurseries, roosting and nesting. The large snags in advanced tree classes can continue to provide habitat for many species and are also utilized by amphibians such as newts, salamanders and frogs.

Individual trees will be assessed for their wildlife characteristics, rated habitat value, and also the danger category based on the activity planned for the vicinity of the trees. For high value wildlife trees, a Windthrow Assessment will be completed to determine the future stability of the trees after the treatment is conducted. Past experience has shown that the ability to leave individual or group retention is site and stand specific.

b) Conditions Under Which Individual Wildlife Trees May Be Removed:

If authorized by a cutting permit or road permit, individual wildlife trees may be removed if they become a safety hazard or they become infested with insects which threaten the health of adjacent trees.

Specific wildlife trees may be removed if they are assessed and determined to be a safety hazard. In this determination the assessment will include the specific activity or level of disturbance that is expected to be performed within the exposure range of the suspect tree. Alternatives to removal of the wildlife tree will be given priority, such as establishment of a no-work zone, or altering the level of disturbance by modifying the treatment prescribed. Where tree removal is necessary, the economic opportunity for salvage will be allowed after assessments for potential ground or other site disturbance factors are considered.

In addition to safety concerns, individual wildlife trees and / or individual trees within retention areas may be removed if they are infested with insects that threaten the health of adjacent trees or stands. This is currently not seen as a likely scenario, but is included as a precautionary tool for the future.

c) Replacement of Individual Wildlife Trees:

The individual wildlife tree management strategy is based on retaining a number of trees that have existing wildlife use and valuable characteristics. The number of trees will vary depending upon site and stand conditions. There will be individual trees that are composed of a variety of species, age and form which provide a variety of habitats. Even trees that fall will continue to provide wildlife habitat and biodiversity values as large woody debris. If a very specific function is performed by an individual tree (e.g. eagle nest or bear den) then recruitment of another tree may include modification (e.g. topping) to enhance the usability for the wildlife user.

If individual wildlife trees are removed they will be replaced with trees of comparable wildlife tree value from a nearby location within the woodlot licence W2031 area.

WILDLIFE TREE RETENTION AREAS

Forest Cover Attributes:

The biodiversity reserves (BR) and visual management area (VMA) described in the section *Areas where Timber Harvesting will be Avoided* make up the wildlife tree retention areas described in Table 1 below.

RMAs, smaller WTPs, and individual wildlife trees will be established concurrent with development, and will add to the wildlife habitat and biodiversity of woodlot licence W2031. The riparian areas contain fishery sensitive systems and associated riparian values to provide preservation for fish, mammals, and amphibious users of this ecosystem.

TABLE 1 WILDLIFE TREE RETENTION AREAS

Name	Stand Number	Forest Cover / Age / SI	Biodiversity Function and Resource Values	Area (ha)
BR 1	1396 1404	Fd6Cw3Hw1 / 276 / 11 PI6Fd3Hw1 / 78 / 19	This is an old growth stand with a mature second growth stand added for old growth and biodiversity recruitment. It falls within the known scenic area visible from Okisollo Channel, with forested areas and rocky points. There is a variety of habitats for birds and mammals, plus deer winter range opportunities.	5.5 1.5
BR 2	1347	Fd100 / 276 / 22	This is an old growth Fd stand, likely with many desirable wildlife tree characteristics for a variety of species, including bird foraging, perching, and nesting, including cavity nesting. Mammals and amphibians will also find habitat. A small stream runs through, providing some riparian characteristics as well.	3.1
BR 3	1319 1270 1322 1291 1264 1460 1341	Fd7Hw3 / 276 / 16 Fd7Hw3 / 276 / 16 Fd7Hw3 / 276 / 16 PI100 / 70 / 19 Dr7Hw3 / 38 / 23 Hw100 / 46 / 24 Hw9Fd1 / 74 / 11	The small old growth patches in this group of stands anchor a diverse range of habitats. There are large brooms on many of the old growth Hw, as well as perching and nesting opportunities for different bird species. The old growth Fd provide various features such as heart rot, cracks and crevices, and thick bark for different species. The PI stand provides deer winter range potential, and the Dr provides a deciduous component.	4.4 1.2 0.9 6.1 0.7 1.3 2.4
VMA	1631 1632 1579 1563 1549	Hw7Fd3 / 82 / 29 n/a / 61-80 / n/a Hw7Fd3 / 77 / 17 n/a / 0-20 / n/a Fd7Hw3 / 76 / 20	This largely mature second growth area is within the known scenic area. It protects the visual integrity from Okisollo Channel, and provides a recruitment area for future old growth. The mature seral stands right on the ocean provide a variety of habitats, especially for marine and coastal species of birds and mammals, as well as perching potential for eagles.	2.0
			TOTAL	29.1

a) Conditions Under Which Trees May Be Removed from Wildlife Tree Retention Areas:

If authorized by a cutting permit or road permit, trees may be removed if they become a safety hazard, if they become infested with insects or diseases which threaten the health of adjacent trees or there is a need to remove the trees to provide access to adjacent stands. If providing access to adjacent stands, the number of quality wildlife trees removed will be no more than reasonably needed to provide the access.

Wildlife trees within biodiversity reserves, the VMA, RMAs or WTPs may be removed if they are assessed and determined to be a safety hazard. In this determination the assessment will include the specific activity or level of disturbance that is expected to be performed within the exposure range of the suspect tree. Alternatives to removal of the wildlife tree will be given priority, such as establishment of a no-work zone, or altering the level of disturbance by modifying the treatment prescribed. Where tree removal is necessary, the economic opportunity for salvage will be allowed after assessments for potential ground or other site disturbance factors are considered.

Wildlife trees within biodiversity reserves, the VMA, RMAs or WTPs may be removed if they are infested with insects that threaten the health of adjacent trees or stands. This is currently not seen as a likely scenario, but is included as a precautionary tool for the future.

b) Replacement of Trees Removed from Wildlife Tree Retention Areas:

If trees are removed from wildlife tree retention areas they will be replaced with trees of comparable wildlife tree value from a nearby location or with trees that will develop good wildlife tree value in the near future if comparable trees are not readily available nearby.

The wildlife tree area retention strategy is based on retaining existing old growth areas in biodiversity reserves, the VMA, RMAs and WTPs / individual WLTs that have present wildlife use and valuable characteristics, as well as recruitment areas around the existing old growth stands. There will be many individual trees composed of a variety of species, age and form. Within this population there will be an increasing value for wildlife over time as the recruitment areas mature into old growth, increasing the number of trees able to provide many of the valuable characteristics of large, old trees. The trees that fall will continue to provide wildlife habitat and biodiversity values as large woody debris.

If a significant number of wildlife trees are lost to windthrow or other catastrophic event in a RMA or WTP, salvage potential will be evaluated, and the replacement with another suitable area in size, value, and species composition will be assessed. If a significant number of wildlife trees are lost to windthrow or other catastrophic event in the biodiversity reserves or the VMA, salvage potential will be assessed, but replacement with stands of like value is unlikely due to the limited nature of examples of these stands within woodlot licence W2031. Replacement would be in second growth stands assessed for suitable biodiversity features and future old growth characteristics. If a very specific function is performed by an individual tree (e.g. eagle nest or bear den) which must be removed, then recruitment of another tree may include modification (e.g. topping) to enhance the usability for the wildlife user.

MEASURES TO PREVENT INTRODUCTION OR SPREAD OF INVASIVE PLANTS

Currently woodlot licence W2031 has no identified incidence of invasive species or noxious weeds. The woodlot licensee is committed to managing invasive plants to maintain native species. Appendix VI contains the *Invasive Plants Regulation (FRPA – reg 18/2004)*, listing the known invasive plants of BC.

The main invasive plant species on Quadra Island is Scotch broom (*Cytisus scoparius*). It is common throughout Quadra along roadsides and open fields. In the event that Scotch Broom becomes established at levels which are detrimental to the native species of the area, the planned method of control is to cut the larger plants at ground level (preferably during bloom), and to pull smaller plants out with the roots attached. Whenever Scotch broom is encountered in woodlot licence W2031 the plants will be removed. The most effective method of control is prompt and successful reforestation of cutblocks thereby shading out the invasive species.

The other main groups of invasive plant species include bull thistle (*Cirsium vulgare*), Canada thistle (*Cirsium arvense*), and various grass species. These species are generally found along roadsides. These species and any additional invasive plant species listed in the Invasive Plants Regulation (reg 18/2004), if found in the woodlot licence area, will be managed accordingly.

In woodlot licence W2031, native plants will be allowed to revegetate areas of new disturbance (eg skid trails, roadsides, quarries) where professional experience indicates that the natural vegetation will be effective. Where application of grass-seed mixture is required along roadside or areas of disturbance, seed mixtures free of invasive plant seed will be used, as per regulations.

MEASURES TO MITIGATE EFFECT OF REMOVING NATURAL RANGE BARRIERS

Not applicable. There is no range management within the woodlot licence.

STOCKING INFORMATION FOR SPECIFIED AREAS

Unless exempted by the district manager, the stocking standards indicated below apply to areas where the establishment of a free growing stand is not required and harvesting is limited to commercial thinning, removal of individual trees, or a similar type of intermediate cutting, and for harvesting special forest products.

For the purposes of section 12 and 34(3) of the WLPPR the Uneven-aged Stocking Standards for single-tree selection, as found in the MFR publication “Reference Guide for FDP Stocking Standards”, are adopted. A copy of these stocking standards is included in Appendix III.

PERFORMANCE REQUIREMENTS

SOIL DISTURBANCE LIMITS

Default WLPPR s.24(1)(b):

- 8% of Net Area to be Reforested

PERMANENT ACCESS STRUCTURES

Default: WLPPR s.25:
The maximum area occupied by permanent access structures is as follows:

1. For Cutblocks ≥ 5 ha – 7% of the total cutblock area
2. For Cutblocks < 5 ha – 10% of the total cutblock area
3. For the Total Woodlot Licence Area – 7% of the total Woodlot Licence area

STOCKING STANDARDS

Option: WLPPR s. 35(1)(a): Use of the current stocking standards, regeneration dates and free growing dates described in the MFR publication “Reference Guide for Forest Development Plan Stocking Standards”, the pertinent sections (including footnotes) are shown in Appendix II.

WIDTH OF STREAM RIPARIAN AREAS

Default WLPPR s.36(4)(b):

The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.36(4)(b).

WIDTH OF WETLAND RIPARIAN AREAS

Default: WLPPR s.37(3)(b) The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.37(3)(b).

WIDTH OF LAKE RIPARIAN AREAS

Default: WLPPR s.38(2)(b) The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.38(2)(b).

RESTRICTIONS IN A RIPARIAN RESERVE ZONE

Default: WLPPR s.39(1) Cutting, modifying or removing trees in a riparian reserve zone is limited to the purposes described in Section 39(1) of the WLPPR for all forward planning the licensees will do in woodlot licence 2031.

WLPPR s.39(2.1): The following road construction is proposed in a riparian reserve zone.

When a pre-existing road is located in a RRZ, and the road is not causing deleterious effects on the stream/wetland/lake values, then the road will be retained in its present location.

A pre-existing road runs along the west edge of Wolf Lake within the RRZ. The road is not causing deleterious effects on the lake values, and there is no practical place to move it to.

RESTRICTIONS IN A RIPARIAN MANAGEMENT ZONE

Default: WLPPR s.40(1)(b)(c) or (d) Construction of a road in a riparian management zone is limited to the conditions described in Section 40(1) of the WLPPR without additional conditions to allow road construction being provided in the woodlot licence plan.

WILDLIFE TREE RETENTION

Unless exempted by the district manager, the proportion of the Woodlot Licence area that will be occupied by wildlife tree retention is:

Default WLPPR s.52(1)(c): 8 % of the woodlot licence area

COARSE WOODY DEBRIS

Unless exempted by the district manager or the WLPPR, the minimum amount of coarse woody debris to be left on areas where there is a requirement to establish a free growing stand is

Default: WLPPR s.54(1)(b)

- Area on Coast – minimum retention of 4 logs per ha ≥ 5 m in length and ≥ 30 cm in diameter at one end.

RESOURCE FEATURES

Unless exempted by the district manager, the woodlot licence holder will

Default WLPPR s.56(1)(b): Ensure that forest practices do not damage or render ineffective a resource feature.

Note: Only the performance requirements in Part 3 (Practice Requirements) of the WLPPR for which an alternative can be proposed are shown in this Woodlot Licence Plan. The remaining performance requirements in Part 3 are not shown, nor are the performance requirements in Part 4 (Roads).

APPENDICES

Appendix I: Woodlot Licence W2031 WLP Maps

1:75000 Locator Map

1:12000 WLP Map

Appendix II: Stocking Standards, Regeneration Dates and Free Growing Dates for Free Growing Stands (Even-Aged Stands)

Appendix III: Stocking Standards for Specified Areas (Uneven-Aged Stands)

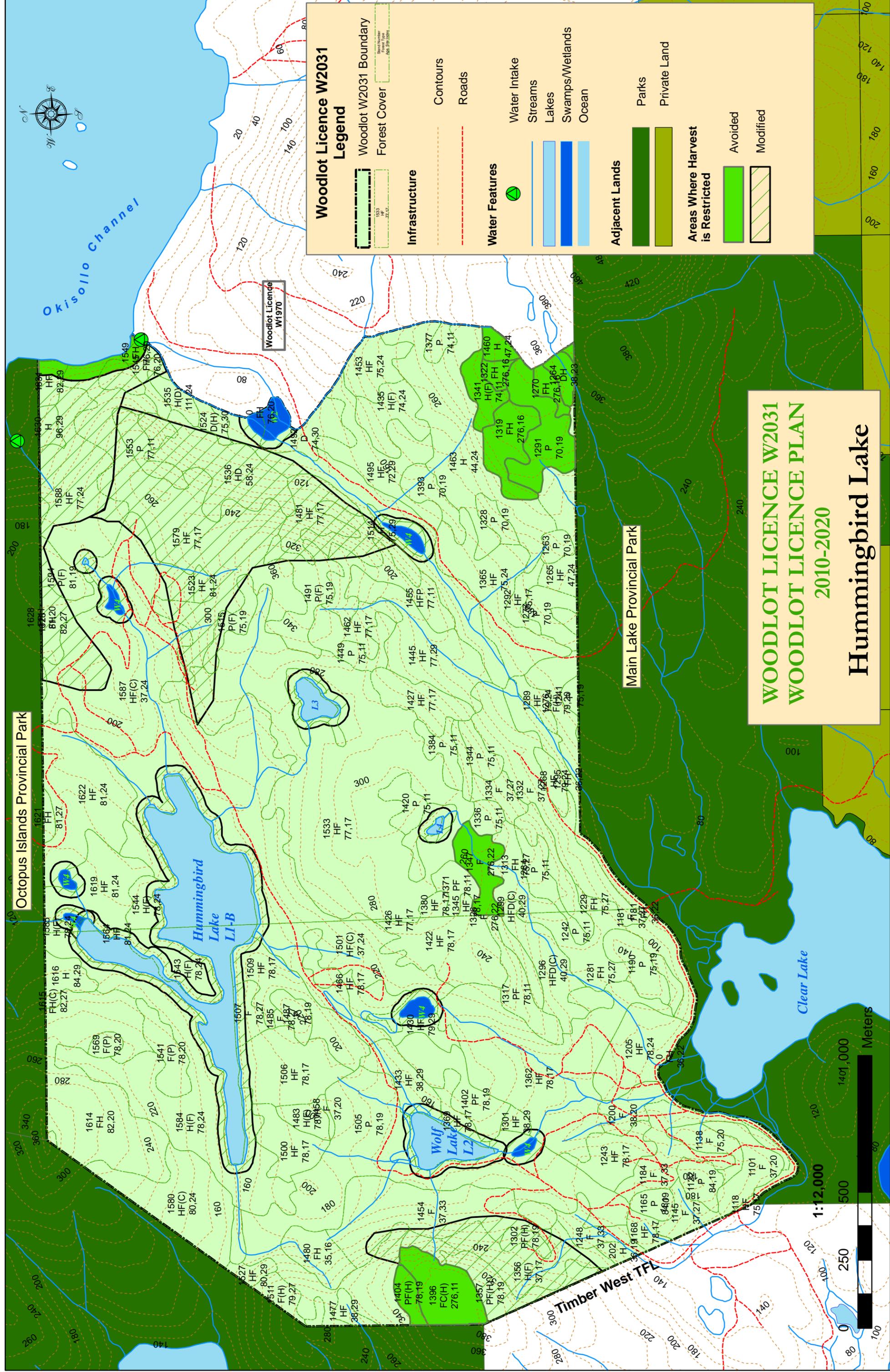
Appendix IV: Visual Quality Information for Woodlot Licence W2031

Appendix V: VQO Definitions from the Forest Planning and Practices Regulation (FPPR) under FRPA

Appendix VI: Invasive Plants Regulation (FRPA)

Appendix I: Woodlot Licence W2031 WLP Maps

- 1:75000 Locator Map**
- 1:12000 Woodlot Licence Plan Map**



Woodlot Licence W2031 Legend

- Woodlot W2031 Boundary
- Forest Cover
- Infrastructure
- Contours
- Roads
- Water Intake
- Streams
- Lakes
- Swamps/Wetlands
- Ocean
- Parks
- Private Land
- Areas Where Harvest is Restricted
- Avoided
- Modified

Octopus Islands Provincial Park

Main Lake Provincial Park

Timber West TFL

WOODLOT LICENCE W2031 WOODLOT LICENCE PLAN 2010-2020

Hummingbird Lake

1:12,000



Hummingbird Lake
L1-B

Wolf Lake
L2

Clear Lake

Woodlot Licence
W1970

Appendix II: Stocking Standards, Regeneration Dates and Free Growing Dates for Free Growing Stands (Even-Aged)

These stocking standards, regeneration dates and free growing dates are copied from the Ministry of Forests' publication, Reference Guide for Forest Development Plan Stocking Standards and apply for the purposes of section 35(1) (a) of the Woodlot Licence Planning and Practices Regulation to areas harvested under this woodlot licence plan where the establishment of a free growing stand is required under section 29(3) of the *Forest and Range Practices Act*.

Biogeoclimatic Ecosystem Classification			Preferred Species*	Acceptable Species*	MITD ³ (m)	TSS (sph)	MSS pa (sph)	MSS p (sph)	Regen date (yrs)	FG Date (yrs)	Min. FG Ht by Species		Crop ⁴ Tree to Brush %
Zone	Subzone	Variant									Species	Ht (m)	
CWH	xm	01	Fd	Hw ²⁴ Cw Pw ³¹	See footnote p.25	900	500	400	3	8-11	Fd Pw Hw Cw,Lw	3.00 2.50 2.00 1.50	See footnote p.25
		02	PI Fd		"	400	200	200	3	8-11	Pw Fd Lw,Ss PI Cw	2.50 2.00 1.50 1.25 1.00	"
		03	Fd PI ⁶	Cw	"	800	400	400	3	8-11	Pw Fd Lw,Ss Hw,PI Cw	2.50 2.00 1.50 1.25 1.00	"
		04	Fd	Cw Pw ³¹	"	900	500	400	3	8-11	Fd Pw Hw Cw,Lw	3.00 2.50 2.00 1.50	"
		05	Cw Fd	Pw ³¹	"	900	500	400	3	8-11	Fd Bg Pw Cw Hw	4.00 3.50 2.50 2.00 1.75	"
		06	Cw Hw Fd ¹⁸		"	900	500	400	6	11-14	Bg,Fd Pw Hw Cw,Lw	3.00 2.50 2.00 1.50	"
		07	Cw Fd	Bg	"	900	500	400	3	8-11	Fd Bg Pw Cw Hw	4.00 3.50 2.50 2.00 1.75	"
		08	Cw Ss ³⁶	Bg	"	900	500	400	3	8-11	Fd,Ss Bg Pw Cw	4.00 3.50 2.50 2.00	"
		09	Cw ¹	Bg ¹	"	900	500	400	3	8-11	Fd Bg Pw Cw	4.00 3.50 2.50 2.00	"
		10	no conifers		"	-	-	-	-	-			"
		11	PI ¹	Cw ¹	"	400	200	200	3	8-11	Pw Fd Lw,Ss PI Cw	2.50 2.00 1.50 1.25 1.00	"
		12	Cw ¹	Hw ¹ Pw ³¹	"	800	400	400	3	8-11	Pw Fd Lw,Ss PI,Hw Cw	2.50 2.00 1.50 1.25 1.00	"
		13	Cw Bg Fd		"	900	500	400	3	8-11	Fd Bg Pw	4.00 3.50 2.50	"

³ Minimum Inter-tree Distance (MITD) =1.6 meters for planting on hygric, sub-hydric or mechanically site prepared areas; and 2.0 meters on all other areas (except those areas where site factors or objectives require a different minimum inter-tree distance.

⁴ The Crop Tree to Brush % = 125% for the BG, ESSF, IDF, MH, MS, PP biogeoclimatic zones and 150 % for all other areas.

											Cw	2.00	
		14	Bg ¹ Cw ¹		“	900	500	400	3	8-11	Fd Bg Pw Cw	4.00 3.50 2.50 2.00	“
		15	Cw ¹		“	800	400	400	3	8-11	Fd Bg Pw Cw	4.00 3.50 2.50 2.00	“

Regen date = Regeneration Date FG Date = Free Growing Date	MITD = Minimum distance between well spaced trees of the preferred and acceptable species	Crop Tree to Brush % = the height of free growing trees relative to the competing vegetation within a 1 m radius cylinder around the tree.	* For explanations of the superscript numbers, please refer to pages 28-30.
TSS = Target Stocking Standard (sph = healthy well spaced trees / ha)	MSSpa = Minimum Stocking Standard of well spaced trees of preferred and acceptable species	MSSp = Minimum Stocking Standard of well spaced trees of preferred species	

More Information that will be used to guide our decisions

BCG Classification					
Zone/SZ	Series	Primary Species	Secondary Species	Tertiary Species	Broadleaf Species
CWHxm	01	Fd	Hw ²⁴	Cw Pw ³¹	Dr ^{7,42,a} Mb ^b Ep ^{18,a} Ra ^b
	02	Pl	Fd		Qg ^b Ra ^a
	03	Fd	Pl ⁶	Cw Hw	Act ^b Dr ^b Ep ^a Mb ^b Ra ^b
	04	Fd		Cw Pw ³¹	Act ^b Dr ^b Ep ^b Mb ^a
	05	Cw Fd		Bg ⁵³ Hw Pw ³¹	Act ^{42,a} Dr ^{42,a} Ep ^{18,a} Mb ^a
	06	Cw Hw	Fd ¹⁸	Bg ⁷	Act ^b Dr ^{7,41,a} Ep ^{18,a} Mb ^b
	07	Bg Cw Fd		Hw	Act ^{41,a} Dr ^{41,a} Ep ^{18,a} Mb ^{41,a}
	08	Bg Cw Ss ³⁵			Act ^{41,a} Dr ^{41,a} Ep ^{18,a} Mb ^{41,a}
	09		Bg ¹ Cw ¹		Act ^{41,a} Dr ^{41,a} Ep ^{18,a} Mb ^{41,a}
	10	no conifers			Act ^b Dr ^b Ep ^b Mb ^b
	11	Pl ¹		Cw ¹	
	12	Cw ¹		Hw ¹ Pw ³¹ Ss ³⁵	Act ^b Dr ^b Ep ^b Mb ^b
	13	Bg Cw	Fd		Act ^{41,a} Dr ^{41,a} Ep ^{18,a} Mb ^{41,a}
	14	Bg ¹ Cw ¹			Act ^{41,a} Dr ^{41,a} Ep ^{18,a} Mb ^{41,a}
	15	Cw ¹			Act ^b Dr ^b Ep ^b Mb ^b

Footnote #	Footnote
1	elevated microsites are preferred
6	restricted to nutrient-very-poor sites
7	restricted to nutrient-medium sites
18	restricted to eastern portion of biogeoclimatic unit in region
24	suitable (as a major species) in wetter portion of biogeoclimatic unit
31	risk of white pine blister rust
35	risk of weevil damage
41	limited by poorly drained soils
42	restricted to fresh soil moisture regimes
53	minor component
#	<u>Broadleaf Management Constraints</u>
a	productive, reliable, and feasible regeneration option
b	limited in productivity, reliability and/or feasibility

MORE FOOTNOTES

<u>Conifer Tree Species</u>	<u>Broadleaf Tree Species</u>
"Ba" means amabilis fir;	"Acb" means balsam poplar;
"Bg" means grand fir;	"Act" means black cottonwood;
"Bl" means subalpine fir;	"At" means trembling aspen;
"Bp" means noble fir;	"Dr" means red alder;
"Cw" means western red cedar;	"Ep" means common paper birch;
"Fd" means Douglas-fir;	"Mb" means bigleaf maple;
"Hm" means mountain hemlock;	"Qg" means garry oak;
"Hw" means western hemlock;	"Ra" means arbutus;
"Lt" means tamarack;	
"Lw" means western larch;	"Biogeoclimatic unit" or "BGC classification" means the zone, subzone, variant and site
"Pa" means whitebark pine;	series described in the most recent field guide
"Pl" means lodgepole pine;	published by the Ministry of Forests for the
"Pw" means white pine;	identification and interpretation of ecosystems,
"Py" means ponderosa pine;	as applicable to a harvested area.
"Sb" means black spruce;	
"Se" means Engelmann spruce;	"MIN" or "Min" means minimum.
"Ss" means Sitka spruce;	
"Sw" means white spruce;	
"Sx" means hybrid spruce or interior spruce;	
"Sxs" means hybrid Sitka spruce;	
"Sxw" means hybrid white spruce;	
"Yc" means yellow cedar.	

**Appendix III: Stocking Standards for Specified Areas (Uneven-Aged
Stands)**

Uneven-aged Stocking Standards* -- Single-tree selection only

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5
Target from Table A standards (stems/ha)	Layer**	Stocking***			Target from Table A standards (stems/ha)	Layer**	Stocking***		
		Target pa	MIN pa	MIN p			Target pa	MIN pa	MIN p
		(well-spaced/ha)					(well-spaced/ha)		
1200	1	600	300	250	800	1	300	150	150
	2	800	400	300		2	400	200	200
	3	1000	500	400		3	600	300	300
	4	1200	700	600		4	800	400	400
1000	1	400	200	200	600	1	300	150	150
	2	600	300	250		2	400	200	200
	3	800	400	300		3	500	300	300
	4	1000	500	400		4	600	400	400
900	1	400	200	200	400	1	200	100	100
	2	500	300	250		2	300	125	125
	3	700	400	300		3	300	150	150
	4	900	500	400		4	400	200	200

MIN - minimum

* Maximum regeneration delay is seven years. For a seven-year regeneration delay, the early free growing is 12 years and the late free growing is 15 years. Regeneration delay can be met immediately following harvest if the residual stand has no significant damage or pest problems and meets minimum stocking standards. If regeneration is achieved immediately following harvest, earliest free growing date is 12 months after completion of harvest and the latest date is 24 months after completion of harvest.

**Stand Layer Definition

Layer 1	Mature	trees >= 12.5 cm dbh
Layer 2	Pole	trees 7.5 cm to 12.4 cm dbh
Layer 3	Sapling	trees >= 1.3 m height to 7.4 cm dbh
Layer 4	Regeneration	trees < 1.3 m height

*** pa - preferred and acceptable species p - preferred species

Preferred and acceptable species and "Target from Table A standards" are as specified in Table A by biogeoclimatic ecosystem classification (BEC) site series.

Appendix IV: Visual Quality Information for Woodlot Licence W2031

- Order for the Establishment of Scenic Areas and Visual Quality Objectives for the Campbell River District
- Determination Rationale
- VQO Map

File: 16290-20

December 14, 2005

Dear Reader:

**Establishment of Scenic Areas and Visual Quality Objectives
for the Campbell River Forest District**

Pursuant to Section 2(2)(a) of the *Forest and Range Practices Act*, I have been delegated the authority to establish scenic areas and visual quality objectives.

Pursuant to Section 7(1) of the *Government Actions Regulation (GAR)*, I hereby establish scenic areas for the Campbell River Forest District (CRFD) as depicted by all polygons that have a designated visual quality objective on the attached maps, numbered 1 through 7, titled *Campbell River Forest District - Scenic Areas and Visual Quality Objectives*, December 14, 2005. These scenic areas reflect adjustments and corrections to the scenic areas originally made known in my letters of October 2, 2001, and February 26, 2003.



Also, pursuant to Section 7(2) of the *GAR*, I hereby establish visual quality objectives (VQOs) for the Campbell River Forest District as shown on the attached maps, numbered 1 through 7, titled *Campbell River Forest District - Scenic Areas and Visual Quality Objectives*, December 14, 2005. These VQOs cancel and replace those established under the Sayward Landscape Unit Plan on February 26, 2003, as well as the October 2, 2001, visual quality classes which were continued as VQOs pursuant to Section 17 of the *GAR*.

These VQOs apply as mapped to all Crown lands in the CRFD, and also as mapped to all Schedule A private lands forming part of *Forest Act* tenures in the CRFD.

Yours truly,


Rory Annett, R.P.F.
District Manager
Campbell River Forest District

Attachments: *Campbell River Forest District - Scenic Areas and Visual Quality Objectives*, maps 1 through 7, December 14, 2005



Distribution: LTR

Document name: G:\!Workgrp\Corp\Temporary\12 December\CRFD VQO Rationale FINAL.doc
JA/RKA/LAO

Contact: John Andres, Stewardship Forester, DCR, (250) 286-9403

Date typed: 2006/03/10 Date last saved: 2006-03-10 1:42 pm

File: 16290-20

December 14, 2005

**Subject: Determination Rationale for the December 14, 2005
Order to Establish Scenic Areas and Visual Quality Objectives for the
Campbell River Forest District**

Authority

Authority to establish scenic areas under Section 7(1) of the *Government Actions Regulation* (GAR) has been delegated from the Minister of Agriculture and Lands to District Managers, Ministry of Forests and Range (MoFR) in a letter dated November 21, 2005.

Authority to establish visual quality objectives under Section 7(2) of the GAR has been delegated from the Minister of Forests and Range to District Managers for the MoFR in a Memorandum dated May 31, 2005.



Legislation

Sections 2, 3, 4 and 7 of the *Government Actions Regulation* provide specific guidance for completion of this Visual Quality Objectives (VQO) Order.

General Background and Planning Context

Planning for visual landscape management has been ongoing for some time in this district and has been the subject of repeated public consultation over the years. These issues were reviewed under the Quadra Plan of 1990 and the Western Strathcona Local Advisory Council report of 1991. Subsequent to this, the Vancouver Island Land Use Plan (VILUP) of 2000 provided general direction for visual landscape management throughout the plan area and more specific direction within Special Management Zones where visuals were identified as a primary objective or value.

Page 1 of 15

**Ministry of
Forests and Range**

Campbell River Forest District

Location:
370 S. Dogwood St.,
Campbell River

Mailing Address:
370 S. Dogwood St.
Campbell River, BC V9W 6Y7

Tel: (250) 286-9300
Fax: (250) 286-9490

Subject

My letter, and map, of October 2, 2001, set out scenic areas with recommended visual quality classes for the Campbell River Forest District. Around the same time and subsequent to my October 2, 2001, letter, visual landscape inventories (VLI) were updated for most TFLs in this district. The net outcome was that two parallel standards emerged for visual landscape management in this district which led to confusion over how the standards should apply in operational planning.

My express purpose in completing this Order is to establish one clear standard for visual landscape management in this district which incorporates the most recent inventory information and which fully considers the range of public interests regarding visual landscape management.

Information Sources Considered

- Quadra Plan, 1993
- Report from the Western Strathcona Local Advisory Committee, 1990
- Vancouver Island Land Use Plan, 2000
- Sayward Landscape Unit Plan, 2003
- Nootka Coastal Land Use Plan, 2001
- Kyuquot Coastal Plan, 2003
- Johnstone-Bute Coastal Plan, 2004 Draft
- Sensitive Area designations for Hyacinthe Point, Heriot Ridge, Saltwater Lagoon, and Nootka Trail, 2003
- Central Coast Land and Resource Management Plan (CCLRMP) – working draft of visual resource management regime
- *Visual Landscape Design Training Manual*, Ministry of Forests, 1994
- Visual landscape inventories and updates for the Strathcona TSA and for those portions of TFLs 19, 25, 39, 45 and 47 within the Campbell River Forest District
- Consultation with visual landscape specialists (both within and outside government), forest licensee representatives, tourism operators, environmental organizations and members of the public.
- *CRFD VQO Order - Summary of Public Input Comments*

All of the above-cited information sources were subject to public review and comment as they were being completed.

Summary of Consultation and Public Advertising

Starting in early 2004, my staff met both individually and as a large group, with TFL holders to review TFL visual landscape inventories and discuss the process for completing this Order.

The TSA visual landscape inventory was sent out to licensees for pre-advertising review on May 12, 2005, requesting comments by the end of the month – no comments were received in response.

Following this consultation, the VQOs proposed for this district were compiled onto one map which was then advertised for public review and comment starting June 1, 2005, and officially ending on July 29, 2005. In addition to advertising in local newspapers, letters

Subject

requesting review and comment were sent to all district licensees, First Nations, local communities, and members of the public who were known to have an interest in this issue.

A number of parties expressed concern that insufficient time had been allowed for comment. In response, my staff informally extended the timeline for response until early December 2005 (5 months + in total). In addition to two open houses held in July, there were many e-mails and letters exchanged, several field trips and numerous meetings including an all-licensee meeting on August 17, two large group meetings at the Stuart/Sonora Island area, and one large group meeting on Quadra Island.

Review of Comments Received

All comments received during the course of this process have been summarized in a document titled *CRFD VQO Order – Summary of Public Input* which includes general and site-specific comments.

TFL 19:

My staff worked with Western Forest Products (WFP) staff in 2004 to review the TFL 19 visual landscape inventory and reach general agreement on the polygons and VQO classes which would be advertised for review. This general agreement was reached by October of 2004.

Once the formal review and comment process began in June of 2005, WFP staff provided additional advice on the VQO establishment process. In addition to a number of general comments about this process, WFP staff also requested less constraining VQOs for Little Espinosa Inlet, Tahsis and Zeballos Inlets, all areas with fishing closures, Tlupana Inlet including Valdez Bay, Zeballos Lake and Muchalat Lake.

BC Timber Sales (BCTS), which has operations within TFL 19, also requested a relaxation of proposed visual constraints in the Burman River/Matchlee Bay area.

There were no responses received from the public, tourism operators, or First Nations regarding proposed VQOs within TFL 19.

In response to these concerns, final VQOs were adjusted to reduce visual constraints for portions of the Matchlee Bay, Zeballos Lake, and Hisnit Inlet. These changes were made to areas anticipated to have less prominent views or lower recreational user levels/expectations. Prior to considering any further changes requested by WFP, I am of the view that further canvassing of local communities and user groups is required.

TFL 25:

My staff also worked with WFP staff in 2004 to review the TFL 25 visual landscape inventory and reach general agreement on the polygons and VQO classes which would be advertised for review. This general agreement was reached by October of 2004.

Subject

Specific to Block 2 of TFL 25, WFP generally advised that district should not establish VQOs over that area given the new visuals regime proposed under the CCLRMP. WFP provided no site-specific comments about Blocks 2 or 3 of TFL 25.

Block 3 of TFL 25 is now managed by BCTS and their staff requested that an area of upper Tiessum Creek mapped as Partial Retention be changed to Modification VQO. This request was supported by digital terrain modelling which illustrated to my satisfaction that views from the Johnstone Strait would be brief enough and distant enough to warrant the change to Modification VQO.

There were no responses received from the public, tourism operators, or First Nations regarding VQOs proposed for Blocks 2 or 3 of TFL 25.

TFL 39:

My staff worked with Weyerhaeuser (now Cascadia) staff, starting in early 2004, to review the existing inventory to assess its suitability for use in establishing VQOs. After this review, Cascadia staff elected to have an update done for the inventory in Block 2 to refine VQOs proposed in the Schoen-Strathcona SMZ (Victoria Peak) and along Highway 19. This updated inventory was submitted to our office in January of 2005 and following review by my staff was accepted for use in this process as submitted.

In part, the reinventory of Highway 19 was responding to concerns raised by the Forest Practices Board in their recent audit of harvest performance in visually sensitive areas for the Campbell River Forest District. Harvesting along the highway edge was noted as an area requiring additional planning and relating to this, one key issue was whether scenic areas and VQOs should be based upon a hypothetical “trees down” model (ie. all trees along the roadside removed) or a “trees up” model (ie. all trees along the roadside retained).

In practical terms, application of the “trees down” model would identify all areas of potentially scenic landscape – thus providing greater certainty for scenic values – but would also result in a much larger area mapped as scenic and this in turn could lead to additional, perhaps unnecessary, constraints to modelled timber supplies and subsequent reductions in allowable harvest levels. Conversely, the “trees up” model more closely approximates current visibility and maintains constraints to timber supplies more in line with current expectations however, this carries some risk to scenic landscape values if critical (ie. vegetative) screens are not well managed.

In their review comments, Cascadia expressed a preference that we focus upon design considerations rather than percentage alteration values when assigning VQOs within the Highway 19 corridor.

BCTS recently assumed management responsibility of that portion of TFL 39 within the Tsitika and Eve River watersheds and they inquired what direction would be provided for management of the highway corridor.

Two comments were received from the public regarding VQOs proposed within Block 2 of TFL 39. One member of the public expressed concern with the appearance of harvesting along Highway 19, while the second writer requested the maintenance of a 60 metre buffer on

Subject

the north side of the White River Mainline where it is adjacent to White River Provincial Park.

One tourism sector writer requested economic tourism zone in the Johnstone Straits, including a part of TFL 39 - Block 5, however no site-specific comments were provided.

No comments were received from First Nations regarding proposed VQOs within TFL 39.

In consideration of the input received, I have decided to establish VQOs for TFL 39 as submitted by Cascadia, including a number of minor edits to the VQOs previously established within TFL 39 under the Sayward Landscape Unit Plan.

Specific to the VQOs I have assigned to the Highway 19 corridor, I am mindful that the definitions for categories of visually altered forest landscape (VQOs) described in Section 1.1 of the *Forest Planning and Practices Regulation* was not designed to apply to the management of foreground viewsapes. I am also mindful that there is a need to address the issue of roadside visual management and that the tools provided in the FRPA need to be adapted to fit the circumstances. The existing VQO management regime was designed to manage views in mid-ground and background areas and this issue highlights the need for additional research and public perception studies of acceptable levels and patterns of visual alteration in foreground viewing areas. Forest Practices Branch staff have such studies underway however it may be one to two years before the final results are available. I have discussed this matter further under the Implementation section of this Rationale.

TFL 45:

“Pre-consultation review” of the 2001 visual landscape inventory for TFL 45 commenced in early 2004 and as a result, some changes were made to reclassify polygons in the Loughborough Inlet area from Partial Retention to Modification in order to maintain consistency with the “VQO buyback” which followed from the 1996 Practices Code Impact Analysis.

In addition to general process concerns, Interfor had outstanding concerns with VQOs proposed for the Phillips and Frederick Arm areas. One submission from Interfor, which included a consultant’s report examining visual landscapes within “TFL 45–South”, proposed that this Order establish VQOs based upon “primary viewpoints” associated with main travel corridors or “secondary viewpoints” associated with lower significance, less frequently travelled areas. A covering letter for this submission also provided an estimate of potential adverse impacts on delivered wood costs where a VQO of Partial Retention was strictly maintained.

Interfor also provided a summary of their consultation efforts over the past 5 years which included data gathered by Recreation Resources Ltd. for the 2001 update of the recreation features inventory and visual landscape inventory, comments provided during the 2000 and 2002 Forest Development Plan reviews, ad hoc queries of local service providers (water taxi, charter airlines, etc), and comments gathered from their participation in the two meetings at Stuart and Sonora Island area.

Subject

One general comment was received from a tourism operator requesting an economic tourism zone in the Johnstone Straits, which included portions of TFL 45, however no comments specific to VQOs proposed for this TFL were received.

No comments were received from First Nations or the general public regarding VQOs proposed within this TFL.

I am mindful of government's commitment to expand the size of the tourism sector in the province and also, that the tourism sector is significant in this locality with potential to expand over time. At the same time, I am also mindful of the significance of these forest operations within the local and provincial economy. To examine this issue further, my staff and licensee staff from Interfor, TimberWest, and BCTS met twice with residents and lodgeowners in the Stuart/Sonora Island resort area and I personally attended the second meeting on August 23/05. This trip included a meeting held at Sonora Resort followed by a field review of scenic landscapes visible between Sonora Resort and Phillips Arm. I have also been informed of ongoing eco-tourism activities associated with upland areas around Phillips Arm and particularly along the reach of Phillips River downstream from the Lake. I have also considered available information and research regarding balancing forestry and tourism economic activity and the associated management of viewsapes.

In consideration of all input received, I have established VQOs for the portion of TFL 45 within the Campbell River Forest District. I acknowledge that there are some outstanding unresolved issues with the application of viewpoints when cutblocks are designed as well as the need for ongoing monitoring of public and tourism operator use levels in this area and I have discussed these issues further under the Implementation section of this Rationale.

TFL 47:

"Pre-consultation review" was also done of the 2001 visual landscape inventory for TFL 47 and final agreement was reached later in 2004 for the VQO classes proposed for review and comment.

Two writers proposed an economic tourism zone for the Johnstone Straits area with one focusing on lodge concentrations at Stuart/Sonora Island and Blind Channel/Cordero Channel areas. A number of residents and tourism operators living on Quadra Island or along adjacent waterways of Okisollo and Hoskyn Channels proposed very restrictive VQOs along shorelines, trails, and prominent viewpoints. Specific to Quadra, major road corridors received significant comment and were field reviewed with residents, tourism operators, and licensees – this issue is discussed further under Implementation. In response to input received and following review with my staff, I have increased the visual constraints in the vicinity of Morte Lake.

Two residents from Owen Bay, on Sonora Island, requested that hillsides around nearby Hyacinthe Lake be recognized as scenic landscapes. My staff reviewed this issue with TimberWest staff who confirm that they have met with local residents in the past. While I recognize the significance of this area to some local residents, I am not satisfied that this could be considered a significant public viewpoint as described in the *Forest Planning and Practices Regulation* as it is not widely known or accessible to the general public. Based

Subject

upon this assessment, I have not assigned scenic areas or VQOs to hillsides around Hyacinthe Lake. I encourage residents that use Hyacinthe Lake and TimberWest to maintain a dialogue and to continue to work together to manage this area for mutual benefit.

No input was received from First Nations regarding VQOs proposed within TFL 47.

In consideration of all input received, I am satisfied that the VQOs I have established for TFL 47 strike a reasonable balance between the needs of the forest and tourism sectors as well as those of the recreating public.

Strathcona TSA and Woodlots:

As noted previously, TSA licensees were notified of the imminent advertising for review and comment of proposed VQOs for the Strathcona TSA; however, no comments were received prior to formal advertising.

As with TFL 47, there were significant amounts of comment received for the Quadra woodlots and many of the same issues were raised along ocean shorelines, along trails and associated significant viewpoints, and along the “major roads” as provided for under VILUP. In general terms, tourism operators and some members of the public favoured more restrictive VQOs which they felt would better support expansion of the local eco-tourism industry. Conversely, woodlot licensees expressed concern that more restrictive VQOs would increase costs and reduce available harvest volumes and cited the significance of forestry to their livelihood and the local economy.

I have considered all of this input and all prior planning context including the Quadra Plan, VILUP, Sensitive Areas established at Heriot Ridge, Hyacinthe Point, and Saltwater Lagoon, and VQOs established in adjacent areas on the west side of Discovery Passage and along the shorelines of Read and Maurelle Islands. I have made a number of changes which, on balance, increase the overall emphasis on visual resource management for Quadra Island. I am satisfied that the final assigned VQOs strike a balance between the needs of the tourism and forestry sectors while also providing for a high quality of life for Quadra residents.

Tourism operators in the Stuart-Sonora Islands resort area requested more restrictive VQOs while emphasizing the importance of scenic values to the successful operation of their resorts. These operators noted the particular significance of Denham Bay as local fishing grounds for them and requested that the most restrictive VQOs be assigned. In addition, local tourism operators also expressed concern that reactivation of the existing log dump at Denham Bay, and subsequent industrial activity, could negatively impact their businesses. BCTS, who has operations in this area, indicated that they could probably work with more restrictive VQOs but expressed concern that the potential loss of the log dump would make operations on this hillside uneconomic given the limited volumes which would be available.

I have considered the needs of the various sectors, and have assigned a Retention VQO to the hillside above Denham Bay but I must emphasize the importance of maintaining the option for BCTS to continue to use the old log dump site at Denham Bay. Both parties will need to work together co-operatively to find a means to ensure that the use of this site respects and meets the needs of both the forestry and tourism sectors. Available research suggests the economic interests of the public will be best served by the coexistence of both sectors.

Subject

TimberWest requested that one polygon on a north-facing slope in Call Inlet be reclassified from Partial Retention to Modification based upon low use levels and following review of this issue with my staff, I have agreed to this requested change.

Specific to the Nootka SMZ, WFP inquired if multiple visual standards could apply to the same area based upon different viewpoints. As I have noted previously in the discussion under TFL 45, there is no provision for me to assign two or more VQOs to the same polygon. At their option, the licensee could propose results or strategies that develop this concept with a commensurate level of analysis and supporting rationale. Any rationale attached to such a request would have to consider any context provided by plans completed to date as well as an assessment of user levels and trends, user expectations and impacts to other sectors.

WFP also requested that less restrictive VQOs be assigned along Tahsis, Zeballos, and Espinosa Inlets, the Port Eliza area, and in areas with fishing closures or lower traffic areas. I have made some adjustments to the VQOs near Bodega Island which retain VQOs adjacent to the most significant anchorages and shallow water passages while applying less restrictive VQOs for locations that I judge to be more industrial settings. Otherwise, I have maintained VQOs in the Nootka Sound portion of this TSA as they were originally advertised. Prior to considering further changes, I would need to see the results of more complete canvassing of local communities and user groups and I have discussed this matter further under Implementation.

The Kyuquot/Checleset First Nation requested that more restrictive VQOs be assigned based upon the rationale that the changes would provide scenic conditions that would be conducive to growth of local eco-tourism opportunities and to support a higher quality of life for families in this area. Specific locations identified were the entire outer coast of the Kyuquot Sound area and in particular areas near the communities of Kyuquot/Houpsitas, as well as the travel corridor from Fair Harbour to Kyuquot/Houpsitas, the Cachalot/Amai Inlet area, and Kashutl Inlet. Some of these concerns were acknowledged in the original VQO package advertised in June of 2005. In addition, I have made some adjustments to VQOs in the Cachalot/Amai, and Union Island areas. Prior to considering further changes for VQOs in the Kyuquot Sound area, I would like to see additional information describing recreational use patterns and user needs and have discussed this further under Implementation.

BC Timber Sales requested the relaxation of VQOs on the shores of John Hart Lake. After further evaluation, I have concluded that it would be appropriate to reclassify polygons previously classed as Preservation VQO under the Sayward Plan to Retention VQO.

Finally, similar to TFL 39, there was significant discussion with licensees, notably BCTS and the holder of Woodlot Licence 1942, regarding operations proposed along the Highway 19 road corridor and the discussions I have summarized under the *TFL 39* section of this Rationale also apply to the TSA areas adjoining Highway 19.

Legislative (GAR) Tests

As delegated decision-maker in this matter, I have considered the legislative tests set out in the Government Actions Regulation (GAR) as follows:

Subject

GAR 2

(1) In addition to the criteria and procedures to be followed by a minister in making an order under any of sections 5 to 15 in relation to an area specified in the order, the minister must be satisfied that:

(a) *the order is consistent with established objectives,*

BC Timber Sales inquired how the new VQOs relate to approved higher level plans while WFP expressed concern that proposed VQOs are more restrictive than what they anticipated under VILUP (both within SMZs and Enhanced RMZs) and would add substantial costs to licensees.

The VQOs established under this Order are consistent with the VILUP Higher Level Plan Order. VILUP identified a number of SMZs in this district where visuals were a primary objective and visual landscape inventories were updated as required to acknowledge this direction. In the case of Quadra Island, the VILUP Summary Plan document identified “major road corridors” as a primary visually sensitive area but left the interpretation of “major roads” to this process.

I have considered WFP’s concern that VQOs proposed in Enhanced RMZs are more constraining than what they anticipated under VILUP. I have reviewed the VILUP Summary Plan and note that all Enhanced RMZs in this district were assigned a General rather than Basic visual management regime. I take this to signal an overall tone of timber harvesting emphasis which at the same time acknowledges local nodes, usually adjacent to settlement areas or significant tourism infrastructure, where scenic landscapes are also significant.

The Nootka Coastal Land Use Plan, 2001, while not a Higher Level Plan was an interagency plan developed with full participation of local communities and licensees and provided significant additional context for assignment of VQOs within the Nootka Sound region.

This Order incorporates VQOs as they were established in 2003 under the Sayward Plan with the exception of incorporating new inventory information for TFL 39, assigning VQOs for Highway 19, and some minor changes for VQOs assigned to John Hart Lake.

Finally, this Order is consistent with Sensitive Area designations completed in 2003 for the Nootka Trail and three areas on Quadra Island.

Some licensees also requested that VQOs not be established within the Central Coast Land and Resource Management Plan (CCLRMP) area given that completion of that process was imminent. I considered this option early on in this process; however, my decision to proceed with establishment of VQOs is predicated on the fact that legal direction around visual management and implementation tools arising from the CCLRMP discussions will not be competed for some time.

(b) *the order would not unduly reduce the supply of timber from British Columbia's forests,*

Two forest licensees as well as forest industry associations questioned which “benchmark” should be used to assess impacts to timber supplies and costs to forest operations.

Subject

My intention in this process has been to maintain “environmental equivalency” in general terms in the transition from the Forest Practices Code of BC, while allowing for site specific or localized variations based upon the merits of the arguments presented.

Since the time of my 2001 letter, visual landscape inventories were updated for most management units in this district and two parallel standards were emerging for scenic landscape management. This key factor was complicating licensee planning and the review of proposed plans by my staff, and also significantly complicated auditors’ work in a recent Forest Practices Board audit of visual landscape management in this district. Most TFL holders expressed a clear preference to use these newly updated inventories in their operational planning. Taking into consideration these expressed preferences, that the net impact to timber supplies from any of the changes would be minor, and finally that these new inventories respond to government’s commitments under VILUP for management of scenic values within SMZs as well as context arising from an assortment of planning processes, I have determined that this VQO Order should be based upon the most currently available inventory information. It should be expressly noted that these inventories as well as the order itself were the subject of public review and comment to ensure public interest issues were comprehensive and current.

- (c) the benefits to the public derived from the order would outweigh any**
 - (i) material adverse impact of the order on the delivered wood costs of a holder of any agreement under the Forest Act that would be affected by the order, and**
 - (ii) undue constraint on the ability of a holder of an agreement under the Forest Act or the Range Act that would be affected by the order to exercise the holder's rights under the agreement.**

Many writers, from a range of sectors, requested the opportunity to review a full analysis of the benefits and costs of proposed VQOs to the people of BC, and various sectors of the economy, prior to this Order’s completion. Forest sector representatives emphasized the potential reductions in timber supplies and increased costs associated with establishing VQOs. Conversely, tourism representatives emphasized the importance of wilderness and scenic area qualities to their sector and the importance of diversifying their operations to service clients with a wide range of interests including fishing, eco-tourism, etc.

I am mindful of government’s commitments to expand the size of the tourism industry as well as potential associated impacts to timber supplies or delivered wood costs. I have made every effort to respond to these often-competing interests in a balanced manner with full consideration of all available information. I encourage ongoing canvassing of local communities and user groups to monitor their interests and use levels and this VQO Order can be revisited as new information becomes available over time.

GAR 3 (1)

Before a minister makes an order under any of sections 5 to 15, the minister must provide an opportunity for review and comment,

(b) in the case of any other order, to the holders of agreements under the Forest Act or the Range Act that will be affected by the order.

Subject

The formal review and comment period ran from June 1 through July 29, 2005. This included advertising in local papers as well as letters and e-mails to district licensees, First Nations, community representatives, and members of the public and tourism operators who had previously expressed an interest in this process. This review and comment period was informally extended to the end of November and during this time, there were numerous meetings with all parties who requested meetings. One formal all-licensee meeting on August 17, 2005, which I personally attended, included representation from all TFL holders, TSA licensees, many district woodlot holders, and Ministry of Forests' representatives from Victoria, Nanaimo, and neighboring districts.

All licensees tenured in this district under the *Forest Act* had the opportunity for review and comment for a minimum period of 5 months and in some cases as long as 22 months. A Record of Consultation is on file which details all of the meetings, letters, and significant contacts over this period of time. As well, all written comments were summarized in a Summary of Public Input which is also on file.

Having reviewed all of the foregoing, and having personally participated in many of the contacts, I am satisfied that adequate opportunity for review and comment has been provided and that this test has been met.

GAR 3 (2)

A minister before making an order under any of sections 5 to 12, 14 or 15 must consult holders referred to in section 2 (1) (c) on whom the order may have a material adverse effect.

District staff consultation efforts and my review of comments received are documented in earlier sections of this Rationale. Having reviewed all of the work prepared by my staff, and having personally participated in many of the proceedings, I am satisfied that consultation requirements set out by Section 3(2) of the GAR have been met.

First Nations

Letters were sent to all First Nations claiming traditional territory within this district on June 16 and July 26, 2005, requesting comments on proposed VQOs. No responses were received to these letters.

An October 14, 2005, letter from the Kyuquot/Checleset First Nation to Interfor (cc'd to our office) regarding Interfor's Forest Development Plan major amendment indicated their intention to contact the provincial government about visual landscape management. In response, my staff sent a letter to the Kyuquot/Checleset First Nation requesting comments on the proposed VQOs. A response letter, dated November 1, 2005, from the Chief outlined a number of general concerns with scenic landscape management and provided site specific comments which were discussed earlier in this Rationale.

A November 1, 2005, letter from the Tlowitsis First Nation responded to the now-completed timber supply review for the Strathcona TSA but also incidentally requested that their office be contacted regarding any "future proposed activities within our traditional territories". My

Subject

staff sent out a letter on November 14, 2005, requesting comments on the proposed VQOs; however, no responses were received to this letter.

GAR 4

- (1) Notice must be given in accordance with this section of an order made under any of sections 5 to 15.**
- (2) The notice required under subsection (1) is sufficiently given if the notice includes a copy of the order or contains particulars or a summary of the order and is**
 - (a) posted on the website of the ministry of the minister who takes the action,**
 - (b) published in the Gazette, and**
 - (c) made publicly available at the regional office of the forest region to which the order relates.**
- (3) An order made under any of sections 5 to 15 takes effect on the later of**
 - (a) The effective date specified under section 2 (3) (b)**
 - (b) The date notice is posted under subsection (2) (a) of this section, and**
 - (c) The date notice is published under subsection (2) (b) of this section.**

This VQO Order was signed on December 14, 2005, advertised in the BC Gazette on December 15, posted to the Ministry of Forests and Range website on December 16, 2005, and made publicly available at the Coast Forest regional office. Therefore, pursuant to Section 4 of the GAR, I conclude that sufficient notice has been given and that this Order is effective as of December 16, 2005.

Finally, letters and e-mails advising of the completion of this process were sent to all district forest licensees, First Nations, community leaders, as well as tourism operators and members of the public who participated in this process.

GAR 7 (1)

- The minister responsible for the Land Act by order may establish an area as a scenic area if satisfied that the area**
- (a) is visually important based on its physical characteristics and public use, and**
 - (b) requires special management that has not otherwise been provided for by this regulation or another enactment.**

As noted previously, authority to establish scenic areas has been delegated to district managers by the Minister of Agriculture and Lands November 21, 2005.

Three licensees inquired how proposed scenic areas and VQOs compare with those previously set out in 2001. These concerns were reviewed with staff of the Ministry of Agriculture and Lands, and visual landscape specialists from District, Region and Branch of the Ministry of Forests and Range.

Having considered all of the information available to me, and considering that the scenic areas establishment is based upon the most currently available inventory information, I am satisfied that all scenic areas identified under this Order are visually important and require special management not otherwise provided for by this regulation or another enactment.

Subject

GAR 7 (2)

The minister responsible for the *Forest Act* by order may establish for a scenic area visual quality objectives that are consistent with subsection (1) and are within the categories of altered forest landscape prescribed under section 1.1 of the *Forest Planning and Practices Regulation*.

As previously discussed, the authority to establish visual quality objectives has been delegated to district managers by the Minister of the Ministry of Forests and Range.

I therefore initiated this process and made the order consistent with my obligations, in consideration of advice from visual landscape specialists of the MoFR District, Region and Branch, considering the need to provide direction on visual management until the CCLRMP process is completed, considering the need for certainty for licensees and other resource interests, and to provide clear direction for licensees in their forest stewardship plans and cutting permit development.

The VQOs established under this Order are consistent with the scenic areas established under Section 7(1) of the Gar and conform to Section 1.1 of the FPPR.

Implementation Issues

Managing visuals adjacent to roadsides

Assignment of a visuals management regime to road corridors was probably the most challenging technical issue tackled under this Order and carried with it some of the most vigorous debate and discussion which I have summarized under earlier sections of this Rationale.

Based upon all of these discussions, my staff identified four key visual design parameters which should be considered where logging is proposed along major road corridors:

- 1) size, shape, timing, and aggregated total of harvest entries along these roads,
- 2) location of roads – both within-block and as they connect with major roads,
- 3) general appearance of logging (slash management, cutblock edge feathering, placement of reserves, etc.)
- 4) management of “critical” roadside screens and the attendant effect on creation of new areas visible from the roads and viewpoints.

After analysis of all of the information available to me, I assigned VQOs of Retention or Partial Retention to road corridors on Quadra Island based upon my consideration of the balance of values represented. Specific to Highway 19, I have decided that an overall tone of Partial Retention VQO is appropriate along this highway corridor, particularly where topographic screens exist; however, I am mindful of the potential risk where “critical vegetative screens” exist and for these areas have assigned a Retention VQO.

I am also mindful that the VQOs I have assigned within the specified road/highway corridors do an imperfect job of conveying government’s intentions for scenic landscape management along road/highway corridors. However, this is the only tool available in legislation. Forest Practices Branch staff in Victoria has public perception studies underway which will

Subject

provide us with better understanding of the site and stand conditions along roadsides to which the public respond favourably or unfavourably. As noted previously, it may be one to two years before the results of this work are available. In the interim, I encourage licensees to develop results and strategies under their Forest Stewardship Plans or Woodlot Licence Plans which would essentially interpret what consistency with these VQOs would mean. Ideally, these results and strategies would be developed collaboratively with other licensees sharing the same road and in consultation with local communities and interest groups.

Viewpoints

There was also significant discussion about which viewpoints should be used for operational planning and the relative significance of various viewpoints. Licensee input included suggestions that the Order specify viewpoints which apply or that multiple VQOs be assigned to a single landform based upon viewpoints with different levels of significance.

I have considered this input and decided that I would not specify viewpoints in this Order. My rationale is that VQOs apply to the polygon or landform which in turn may be visible from any number and combination of viewpoints. Viewpoints are used during the VLI process to help determine visual sensitivity and are also used operationally to determine if a VQO will be achieved. I also note that viewpoints and their significance can evolve over time as a function of both changes in vegetation (for example, screening or lack of it) and changing use by the public and stakeholders. I am of the view that prescribing foresters should use their professional judgement, along with existing guidance and the assistance of qualified professionals, to determine which viewpoints should apply when designing roads or cutblocks within scenic areas.

Licensees are free to propose results and strategies to address the VQOs established under this Order. In doing so, they will need to consider all relevant planning context and an understanding of user levels and expectations as well as the impacts to other sectors. Essentially, what this means is that professionals employed by licensees will have to determine for themselves what consistency with these objectives means relative to guidance provided by the Association of BC Forest Professionals through papers such as the *Definition of Professional Reliance*, September 2004 and *Interpreting the Publics' Interest*, May 31, 2002.

Blended Scene Management

A number of licensees expressed interest in combining adjacent VQO polygons when they are developing operational plans for roads and cutblocks. These scenarios might combine a number of foreground units or alternately a mix of foreground, midground and background units. This concept was also favoured by Forest Practices Board auditors in a recent visuals audit for this district based upon the view that the public evaluates the scene as they see it rather than on an individual landform basis.

With few exceptions, this approach has focused upon managing percentage alteration values (i.e. area disturbed within total scenic area). These values are helpful in that they provide one indicator of the potential acceptability of a cutblock within a scenic landscape; however other design parameters are also very important. I note that definitions of VQOs, found in

Subject

Section 1.1 of the FPPR, focus on overall size, general “fit” in the landscape, and general appearance as primary factors to be considered in determining whether or not a VQO has been met.

In any event, it seems clear that a blended scene management will necessitate increased levels of collaboration between licensees sharing viewsheds. Harvesting on private land, although beyond the current sphere of the provincial regulatory environment, could also form part of the analysis as the public often has no way of distinguishing between private and Crown land harvest and simply assesses the visual impact of harvesting as they see it.

Additional Community Consultation required

There were numerous instances where changes were requested which I was unable to accommodate as the requests were not accompanied by sufficient assessments of the public’s or cross-sectoral issues and interests.

Before I could consider further changes, I feel that more complete consultation is required with local communities, user groups, economic sectors and First Nations to assess the potential benefits and costs to the public or sectors from any additional changes to VQOs established under this Order. Such processes could be led by the forest sector or government; however, at this time, I can make no commitments on such processes other than to confirm our interest in and willingness to participate in such information gathering.

Determination

Having satisfied myself that I have considered all pertinent details related to this issue, and having balanced the important social and economic objectives of all stakeholders, I have concluded that scenic areas and visual quality objectives should be established through a GAR Order. Accordingly, I have approved the scenic areas and VQO Order, and its associated Maps 1 through 7, as dated December 14, 2005, for the Campbell River Forest District.

Yours truly,

A handwritten signature in blue ink, appearing to read "Rory K. Annett". The signature is stylized and written over a light blue rectangular background.

Rory Annett
District Manager
Campbell River Forest District



Okisollo Channel

**Woodlot Licence W2031
Visual Quality Objectives
Legend**

Woodlot W2031

Infrastructure

- Contours
- Roads

Water Features

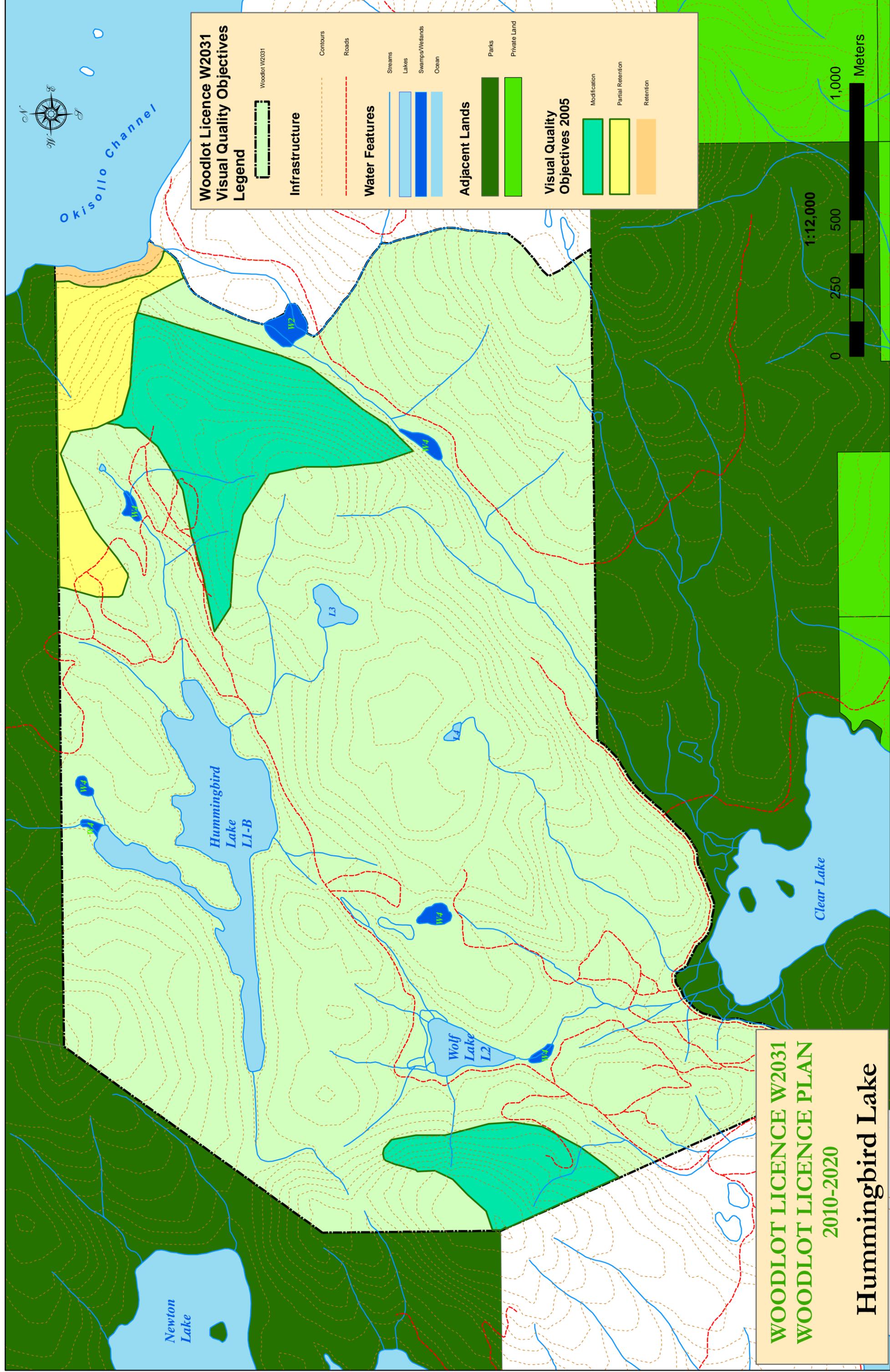
- Streams
- Lakes
- Swamps/Wetlands
- Ocean

Adjacent Lands

- Parks
- Private Land

Visual Quality Objectives 2005

- Modification
- Partial Retention
- Retention



**WOODLOT LICENCE W2031
WOODLOT LICENCE PLAN
2010-2020**

Hummingbird Lake

1:12,000



Meters

Appendix V: VQO Definitions from the Forest Planning and Practices Regulation (FPPR) under FRPA

The VQO definitions are borrowed from the Forest Planning and Practices Regulation under FRPA.

Categories of visually altered forest landscape

1.1 For the purposes of paragraph (c) of the definition of "altered forest landscape" in section 1, the following categories are prescribed, each according to the extent of alteration resulting from the size, shape and location of cutblocks and roads:

(a) preservation: consisting of an altered forest landscape in which the alteration, when assessed from a significant public viewpoint, is

- (i) very small in scale, and
- (ii) not easily distinguishable from the pre-harvest landscape;

(b) retention: consisting of an altered forest landscape in which the alteration, when assessed from a significant public viewpoint, is

- (i) difficult to see,
- (ii) small in scale, and
- (iii) natural in appearance;

(c) partial retention: consisting of an altered forest landscape in which the alteration, when assessed from a significant public viewpoint, is

- (i) easy to see,
- (ii) small to medium in scale, and
- (iii) natural and not rectilinear or geometric in shape;

(d) modification: consisting of an altered forest landscape in which the alteration, when assessed from a significant public viewpoint,

- (i) is very easy to see, and
- (ii) is
 - (A) large in scale and natural in its appearance, or
 - (B) small to medium in scale but with some angular characteristics;

(e) maximum modification: consisting of an altered forest landscape in which the alteration, when assessed from a significant public viewpoint,

- (i) is very easy to see, and
- (ii) is
 - (A) very large in scale,
 - (B) rectilinear and geometric in shape, or
 - (C) both.

[en. B.C. Reg. 580/2004, s. 2.]

Appendix VI: Invasive Plants Regulation (FRPA)

B.C. Reg. 18/2004
effective January 31, 2004

O.C. 21/2004 Deposited January 23, 2004

Forest and Range Practices Act Invasive Plants Regulation

Application of sections 16 (2) and 37 (2) of the Act

1 Until June 1, 2004, this regulation applies immediately, despite sections 16 (2) and 37 (2) of the Act, to a forest stewardship plan, woodlot licence plan, range use plan, and range stewardship plan, as applicable.

Invasive plant species specified

2 For the purposes of section 47 of the Forest and Range Practices Act, the prescribed species of invasive plants are as follows:

WEED SPECIES	SCIENTIFIC NAME
Anchusa	<i>Anchusa officinalis</i>
Baby's breath	<i>Gypsophila paniculata</i>
Black knapweed	<i>Centaurea nigra</i>
Blueweed	<i>Echium vulgare</i>
Brown knapweed	<i>Centaurea jacea</i>
Bull thistle	<i>Cirsium vulgare</i>
Canada thistle	<i>Cirsium arvense</i>
Common burdock	<i>Arctium minus</i>
Common tansy	<i>Tanacetum vulgare</i>
Dalmatian toadflax	<i>Linaria dalmatica</i>
Diffuse knapweed	<i>Centaurea diffusa</i>
Field scabious	<i>Knautia arvensis</i>
Giant knotweed	<i>Polygonum sachalinense</i>
Gorse	<i>Ulex europaeus</i>
Hoary alyssum	<i>Berteroa incana</i>
Hoary cress	<i>Cardaria draba</i>
Hound's-tongue	<i>Cynoglossum officinale</i>
Japanese knotweed	<i>Polygonum cuspidatum</i>
Leafy spurge	<i>Euphorbia esula</i>
Marsh thistle	<i>Cirsium palustre</i>
Meadow hawkweed	<i>Hieracium pilosella</i>
Meadow knapweed	<i>Centaurea pratensis</i>
Nodding thistle	<i>Carduus nutans</i>
Orange hawkweed	<i>Hieracium aurantiacum</i>
Oxeye daisy	<i>Chrysanthemum leucanthemem</i>
Perennial pepperweed	<i>Lepidium latifolium</i>
Plumeless thistle	<i>Carduus acanthoides</i>
Puncture vine	<i>Tribulus terrestris</i>
Purple loosestrife	<i>Lythrum salicaria</i>
Rush skeletonweed	<i>Chondrilla juncea</i>
Russian knapweed	<i>Acroptilon repens</i>
Scentless chamomile	<i>Matricaria maritima</i>
Scotch broom	<i>Cytisus scoparius</i>
Scotch thistle	<i>Onopordum acanthium</i>
Spotted knapweed	<i>Centaurea maculosa</i>
St. John's wort	<i>Hypericum perforatum</i>

Sulphur cinquefoil	Potentilla recta
Tansy ragwort	Senecio jacobaea
Teasel	Dipsacus fullonum
Yellow Iris	Iris pseudacorus
Yellow starthistle	Centaurea solstitialis
Yellow toadflax	Linaria vulgaris

[Provisions of the Forest and Range Practices Act, S.B.C. 2002, c. 69, relevant to the enactment of this regulation: sections 47 and 141]

Copyright (c) Queen's Printer, Victoria, British Columbia, Canada

II. SUPPLEMENTAL INFORMATION IN SUPPORT OF THE PROPOSED WOODLOT LICENCE PLAN

1. REVIEW AND COMMENT

- a) Advertising
- b) Referrals
- c) Copy of Written Comments Received
- d) Revisions Made as a Result of Written Comments Received

2. FIRST NATIONS CONSULTATION

3. EXEMPTIONS

4. RATIONALE IN SUPPORT OF PROPOSED ALTERNATIVE PERFORMANCE REQUIREMENTS

1. REVIEW AND COMMENT

a) Advertising

The ad below went into the Hungry Eye (September 8, 2010 edition) and the Discovery Islander (September 10, 2010 edition).

PUBLIC VIEWING OF THE DRAFT WOODLOT LICENCE PLAN AND DRAFT MANAGEMENT PLAN FOR WOODLOT LICENCE W2031

The licensees of woodlot licence W2031 are holding a public viewing of their draft Woodlot Licence Plan and draft Management Plan. Woodlot licence W2031 is located on northeastern Quadra Island, between Main Lake Provincial Park and Octopus Islands Provincial Park.

The initial draft 10 year Woodlot Licence Plan (WLP) and draft Management Plan for woodlot licence W2031 will be available for public viewing and comments at the **Quadra Island Community Centre, Room #1, on Friday September 17, 2010 from 4:30 to 8:30pm**. Any interested members of the public are invited to attend. The draft plans are available for review and comment for 30 days, starting with the publication of this notice. The draft plans are available for review by resource agencies and the public before approval is considered by the Ministry of Forests and Range.

Written comments must be received no later than Monday October 18, 2010. Copies of the draft plans will be located at the Vancouver Island Regional Library - Quadra Island Branch, and at the Campbell River District office of the Ministry of Forests and Range (370 South Dogwood Street). An electronic copy of the WLP can be requested by email at tamarix@shaw.ca. Written comments should be sent to Chantal Blumel, RPF, PO Box 482, Ladysmith, BC V9G 1A4, or via email at tamarix@shaw.ca. To discuss these draft plans outside of the public viewing timeframe, please contact Chantal Blumel or Ken Dodd (250-245-4291).

b) Referrals

Ministry of Environment – Erica McClaren – digital copy sent
Erica.McClaren@gov.bc.ca

Department of Fisheries and Oceans (DFO) – Rick Senger – digital copy sent
SengerR@pac.dfo-mpo.gc.ca

Marine Harvest Canada, Campbell River – phone communication regarding woodlot licence W2031 WLP for area near their water intake(s) will be advertised. 250-850-3276

c) Copy of Written Comments Received

Find attached copies of the written comments and our responses to them.

Sign In and Comment Sheet

Woodlot W2031 – Public Viewing

September 17, 2010

Name	Signature	Phone # / Address	Comments (for longer comments, please take a Comment Sheet)
RICHARD LEICESTER		285-2663	
YVONNE WILLIAMS	Yvonne Williams	285-3070	
MICHAEL MASCALI		2330	
JUDY LEICESTER	J. Leicester	285-2663	
SUSAN (NESTOR)	S.W.	285-3632	
Nel Cox		285-3648	
Paul Nimmom	P. Nimmom	285-2845	
MARK NICHLSWADDER		285-3548	
RICK MONCHAK	Rick Monchak	286-7304	
Jane Monchak	J. Monchak	923-8588	
Tom Burns		285-2272	Electronic copy of photo for connection to bc.ca

P. O. Box 195
Quathiaski Cove,
British Columbia, V0P 1N0

Ms. Chantal Blumel and Mr. Ken Dodd,
P. O. Box 482,
Ladysmith,
British Columbia V9G 1A4

28 September 2010

Dear Ms. Blumel and Mr. Dodd:

re: Woodlot Licence #W 2031 – Quadra Island.

Further to the Open House for Woodlot #W 2031 held on September 17, 2010 this letter is to confirm in writing some of the matters discussed with you at that time, namely:

1. ORIGINAL INTENT. The Woodlot program was originally presented by the Forest Service and accepted by the Forest Resource Committee, as informed representatives of the community. The core intent was that Woodlots would benefit the community as a consequence of being operated by local people ... people who possess a wealth of local knowledge and are concerned about the whole spectrum of Island issues.

→ MINISTRY
CRITICISM

Over time the Ministry of Forests, or its staff, have lost sight of this original vision. Your stated policy of employing Quadra Island people at times when work on the woodlot is to be contracted out is a step in the right direction but by no means does it approach the extent of the original intent of the woodlot program. However it is a step you can take, and I commend you for proposing it – though not to the point of relieving the Forest Service of failed responsibility. There was a recent sad and unsavory incident when a number of wolves belonging to Quadra Island's solitary wolf pack were shot by off-Island workers. The effects, which continue to be felt, illustrate the kind of unintended consequence which may occur when employing people from other areas who have neither the benefits or care which arise out of firsthand local knowledge.

2. SHORELINE TRAIL. The Quadra Island Official Community Plan clearly sets out the vision for a shoreline trail on Crown Land around the perimeter of much of Quadra Island. This already exists in the form of official Gazetted trails from Surge Narrows Road to Surge Narrows Provincial Park and from Newton Lake to the Small Inlet/Waiatt Bay portage trail in the Provincial Park there. A flagged route exists along the shoreline from the end of the Surge Narrows trail to the Waiatt Bay Portage, which for a short distance follows the shoreline of this Woodlot. I understand you have no objection and are in agreement with this use.

Quadra Island's trail system has become a substantial asset. It has benefited many in the visitor sector. For many, it has provided alternate and needed benefits at a time when there has been a downturn on logging caused by the recent recession. The real name for this is "diversification".

3. PROTECTION OF THE VIEWSCAPE SEEN FROM THE PARK AT CLEAR LAKE. This would include upland areas north of the Clear Lake Road, which forms the Northern boundary of the park. I believed this should include the avoidance of logging where it might jeopardize park values, as well as no permanent or temporary structures, or the construction of any other "improvements" in that vicinity. I understood you are in agreement in principle. This area is within a Special Management Zone SMZ 19) for which "The Primary Objectives are to protect biodiversity, visual resources, recreation/tourism resources, wildlife and fishing". This proposed protection is consistent with these objectives.

4. ENHANCEMENT OF A WILDLIFE CORRIDOR BETWEEN HUMMINGBIRD LAKE and the adjacent Provincial Park would benefit wildlife as well as the recreation/tourism values arising out of the proposed loop trail from Waiatt Bay portage - passing Quadra's largest waterfall just below

RECEIVED

OCT 29 2010

MINISTRY OF FORESTS & RANGE
CAMPBELL RIVER

Hummingbird Lake - and back to Newton Lake. This also is consistent with the Primary SMZ Objectives referred to above.

5. PROTECTION OF OSPREY HABITAT AT HUMMINGBIRD LAKE. While visiting this lake I have observed osprey feeding and nesting. This has also been witnessed by other naturalists and Quadra Island bird-watchers. You should be aware of the probable presence of these birds and will hopefully take steps to avoid disturbing their habitat. Without prejudicing the importance of that *in general*, I suggest that, *in particular*, if osprey are still present, a firm commitment should be made to prevent their disturbance when nesting and until all fledglings have flown.

6. NO LOGGING ON THE PENINSULA IN HUMMINGBIRD LAKE. The extremely limited scale of this geographic feature and the minimal benefit to be obtained from logging after allowing for regulatory setbacks from the shoreline, together with the SMZ wildlife and recreation/tourism benefits and the proposed loop trail set out in Para. 4 above, strongly support the argument to permanently provide protection for this small area in your development plan.

"NO SPRAYING, EVER" and "CONTROL WILL BE STRICTLY MANUAL" are verbatim quotes of two statements you made which appear in my notes. I would like to thank you for this undertaking. It is consistent with what many of us have been striving for on Quadra Island for very many years. In this instance I think your intention is particularly appropriate as there is a Provincial Marine Park, increasingly frequented by yachtsmen, kayakers and others, who are quite likely to take water from sources located directly below Woodlot #2031. A couple of these streams flow into Waiatt Bay, and at the head of Small Inlet there is a delightful bubbling spring, which I believe flows year-round. While we do not nowadays trust many water sources, the avoidance of unnecessary and unanticipated, chemical pollution of drinking water from an apparently pristine wilderness source, seems a desirable objective for all the potential users of these water sources.

8. GATING CLEAR LAKE ROAD. I concur with the Ministry of Parks request for a gate to prevent vehicular traffic in order to lessen the probability of fire or mischief in this unsupervised area of Quadra Island once the Clear Lake road is improved. ✓

Finally, I am sure you are both familiar with Merv Wilkinson and the practices he established at "Wildwood". I have high hopes this Ladysmith connection will lead to better than average inspiration and practices here and continuing cooperation respecting Quadra Island's uniqueness and the SMZ Objectives which relate to Woodlot #2031. ✓

Kind regards,


Noel Lax.

cc - ✓ Strathcona Regional District Director, Jim Abram
✓ Ministry of Forests, Jim Simpson
- Wilderness Tourism Association of B.C., Rod Burns
- Sierra Club of Canada, Quadra Island Group

November 22, 2010

PO Box 482,
Ladysmith, BC
V9G 1A4

Noel Lax
PO Box 195,
Quathiaski Cove, BC
V0P 1N0

Attention: Noel Lax
Re: Woodlot Licence W2031 – Quadra Island

Thank you for your thoughtful comments regarding our draft Management Plan (MP) and Woodlot Licence Plan (WLP) for woodlot licence W2031.

We will respond to your points as presented in your letter.

1. Original Intent

This is a point that must be discussed with the Ministry of Forests. We cannot direct policy.

As conscientious forest professionals with many years of experience in various aspects of the industry, we feel confident that we can manage woodlot licence W2031 for the many values important to a healthy forest ecosystem. We do not intend to do this in isolation – we have many ties to Campbell River and Quadra Island, and love the area. We hope to become a part of the community and will rely on local expertise. Public consultation is a key principle in the management of Crown lands.

2. Shoreline Trail

As discussed at the open house on September 17, 2010, we have no objection to a shoreline trail within the Visual Management Area (VMA) of the woodlot licence. As such, we will add a statement into the WLP, under Visuals in the section *Areas where Harvesting will be Avoided* (page 7). The statement will read: “As well, retaining the VMA will also accommodate the potential construction of trails.” If the shoreline trail cannot be accommodated within the 60m permanent retention VMA along Okisollo Channel then we will work cooperatively to make find an appropriate alternative.

3. Protection of the Viewscape seen from the Park at Clear Lake

Under the section *Areas where Timber Harvesting will be Modified* (page 8) in the WLP it clearly states, “Although areas visible from Clear Lake (part of Main Lake Provincial Park) are not identified as a known scenic area, cutblocks visible from Clear Lake will be harvested using a retention silvicultural system where practical, or if the terrain is suitable, a clearcut system. Clearcut cutblocks will be kept small (<5ha), and their appearance natural by utilizing existing topography to blend the boundaries. These areas will be determined as development continues.” We feel that this is a strong commitment to protect the viewscape from Clear Lake.

The whole woodlot licence area is within Special Management Zone 19 (SMZ 19) under the Vancouver Island Land Use Plan (VILUP), and we wrote the WLP to be consistent

with both the primary values and the primary objectives of SMZ19. This is clear in the section *Resource Management Zones, Landscape Units or Sensitive Areas* on page 4 of the WLP. To quote: “The primary values of SMZ 19 are ecosection biodiversity and representation; coastal and shorelands wildlife values; and visual qualities, especially in association with marine recreation and major road corridors. The primary objectives of SMZ 19 are to protect biodiversity, visual resources, recreation/ tourism resources, wildlife, and fish.”

Based on a perceptive comment received from Sierra Quadra, we will add the following sentence to the above section: “The maximum clearcut size within SMZ19 is 5 hectares.”

4. Enhancement of a Wildlife Corridor

We will commit to retaining at least the full RMA along the stream heading north from Hummingbird Lake into Octopus Islands Provincial Park. Consideration regarding any further retention will be made if and when we consider harvesting in this area and can look at the requirements of all the non-timber values.

5. Protection of Osprey Habitat at Hummingbird Lake

All pertinent legislation regarding raptor nests will be followed. This includes a legislated blanket protection of active nests of raptors. Based on your reports, we will pay particular attention to areas associated with all lakes for the presence of osprey nests prior to development. We are always on the lookout for large species nests, such as ospreys, eagles, and herons.

6. No Logging on the Peninsula at Hummingbird Lake

We cannot commit to that at this time. As responsible forest professionals, we have walked a large part of woodlot licence W2031, including the roads past Clear Lake and Wolf Lake, to the farthest eastern biodiversity reserve, around Hummingbird Lake, out through Newton Lake, and up from Waiatt Bay. We have retained the identified old growth stands. We have retained a larger than required buffer along the shoreline of Okisollo Channel. This was all done in recognition that these areas were more valuable being retained than being harvested, based on our knowledge and experience, and the VILUP and SMZ19 objectives and values. We will look at each area of planned harvest on a site specific basis. The “small” area of the peninsula would potentially represent approximately half a year’s cut. That’s quite a lot actually, for a small licensee. We are committed to an annual harvest with the MoF, and are trying to keep a balanced approach when making our plans. We can commit to thoroughly walking the peninsula area during the development of the woodlot licence, and making a final decision with your comments in mind.

7. No Spraying / Control will be Strictly Manual

Absolutely. We have always felt that way. It was pointed out in the letter from the Sierra Quadra that our MP stated “Herbicides will not be considered at this time” was somewhat ambiguous. We agreed, and removed “at this time” from the phrase. Our final MP submission says simply “Herbicides will not be considered.”

8. Gating Clear Lake Road

We have been in touch with TimberWest and BC Parks about installing a gate once there is increased vehicle access to the area. Both BC Parks and TimberWest agree that this is necessary. Our final MP now states “During consultation with local stakeholders,

TimberWest, and BC Parks, installation of a gate was requested to restrict vehicle access into wilderness areas adjacent to woodlot licence W2031.” We will follow up on this request as development occurs. The location and design of the gate will be planned to restrict both regular vehicle and ATV passage.

This letter and your letter will form part of the final submission of the MP and WLP for woodlot licence W2031, but if you have any more questions or concerns, please feel free to contact us.

Sincerely,

Chantal Blumel, RPF
Ken Dodd, RPF

Cc Jim Simpson, Woodlot Licence Coordinator, Campbell River Forest District, MoF

September 20,2010

DRAFT ONLY!!!!!!

Woodlot Application 2031
Tamarix Contracting,
Ladysmith, B.C.

Information, on which these comments are based comes from attending the Public Viewing of the Woodlot Plan, Quadra Island, September 17, 2010 and from review of the woodlot plan, as emailed to me on the same day.

In this comment, I will focus upon Old Growth / Ancient Tree – Forest Retention

a) Ancient Forest Retention.

At the public hearing, one professional forester identified on their woodlot map, 3 zones which consist of trees which are primarily hold Ancient Growth characteristics. Specific comments were made the essence of which, as I recall being:

- The primary tree type in the 3 Retention zones was Hemlock and 273 years + in age.
- The ancient Hemlocks were of poor quality, gnarly, of poor quality.
- They were likely left standing (1920 – 1970) due to a) their being Hemlock and of low economic value b) they are higher elevation – difficult to access c) the terrain is very steep making for expensive road construction d) the cost of road construction to haul out poor quality Hemlock is likely why the trees were left standing / will be left standing.

3 Blocks were thus put into Tree Retention and netted out of the total woodlot cut volumes.

A Question asked by this writer: What about single tree or a cluster of ancients, which might be located when conducting more detailed on-the-ground timber inventories – Will they be protected from harvest / from being cut down?

Reply: Ancient trees will be considered on a tree by tree basis. E.g if they are identified as Danger Trees, then they will be cut down, to meet Workers Compensation Board Requirements!

- Other trees will be evaluated, and decisions made

#2 Question asked by this writer: If you want to do innovative harvesting, as you stated a few minutes ago – then why not give the Ancients Trees a buffer of younger trees, providing a multi-age cluster? Such a management method would provide a wind throw break, from Coastal Outflows (summer and winter at 120 kmph ++++)!

Additional comments by this writer recounted how in the late 1990's, early 2000 -Quadra Islanders learned first hand (**once again !!!!!**) only too well from Raven Industries and other companies that Single Tree retention is a joke! Conditions of wind and rains in a few years topple many of the Ancients

Reply by the applicant: We have to consider the economics of leaving trees behind, and additional costs of leaving buffers to protect trees!

b) **From the Applicants Woodlot Management Plan,**

Page 9: Present Harvesting Opportunities

“The program scheduled for the next 5 years is the following polygons for harvesting (in this order) **1326, 1347, 1270, 1319, 1322**, 1535, 1630, 1616, 1631, 1527, 1430, 1514, and 1445. **The first 5 stands are old growth Douglas Fir leading**, which is most of all that is left in the woodlot licence. The remainder of the scheduled stands consists predominantly of mature hemlock.

I find that there is a clear contradiction in the management point of view for Old Growth / Ancient trees (aged 273+) between what was said at the public hearing and what is being submitted for official consideration in their cut plan!

a) *Public Hearing* The only *ancients* appear to be Hemlock and these *will be put into Retention*

Vs.

b) *Woodlot Management Plan: The first 5 years of harvesting will target 5 polygons of Old Growth (273+) . . . which is almost all that is left in the woodlot licence!*

Readily available reading materials consistently identify that the Coastal Douglas Fir – Hemlock forest / Ecosystem (pre logging) had an age gradient up to 1200 years!

HOW is it that two professional Foresters, who, in public, professed their desire to manage their woodlot for a complete ecosystem, plan to terminate the primary tree type (Douglas Fir) at approximately ¼ (273 years) of its known life expectancy of 1,000 years plus – IN THE FIRST 5 YEAR CUT PLAN???

With the At First Opportunity, they have planned the total eradication of tree classes beyond 273 years, - an as a corollary, these Professional Foresters are also advocating for total eradication of other plants, animals, birds, insects, mosses which over the past 7,000 years have evolved to inhabit a niche within the 1,000+ year old ecosystem.

c) Old Growth Retention, as a Ministerial Policy 2010

Pat Bell, Minister of Forest and Range in a Spring 2010 press release, made the public announcement of the Ministries policy of retention of ancient trees and intact ancient tree ecosystems.

The Professional Foresters at the public meeting, while holding up Procedure Binders, stated that they are adhering to Government Policy in setting out their woodlot cut plans and their treatment of Ancient Trees. *The Policy for Woodlot applicants appears to be a flagrant contradiction of ministerial pronouncements.* – Unless in the fine print of the Forest Act and Old Growth Retention strategies, the Ministry of Forest and Range, through the issuance of Woodlot licenses, **encourages, permits and actually enables the harvest of Ancient Forests??????**

b. At the public meeting, Quadra Island, September 2010, an attending Fiber Procurement Manager for TimberWest, the Quadra Island local Tree Farm Licence holder, openly discussed the “Non Spatial Old Growth Order” In discussion he noted:

- a) His road engineers know to re-locate any road which might require the cutting / removal of an ancient / old growth three (273 years +)
- b) Ancient Trees, when located by Tree Fallers are provided with extra wind break buffers, to secure the survival of the tree
- c) He was at a loss, as to why Woodlot Applicants were not expected to adhere to the Non-Spatial Old Growth Order, at terms and conditions expected of Tree Farm Licence holders.

d) Quadra Island Community Plan, and retention of Ancient Trees, Groves, Forests

A review of public meetings, protests, discussions and Established Community Plans will identify that the RETENTION of Ancient Trees / Forest Ecosystems (273 years +) is a primary expectation by residents of any and all existing woodlot operators and new applicants. Hundreds of hours have been spent at meetings, in front of cameras to establish the point of Old Growth Retention is paramount!, which includes having the District Forest Manager flag as concerned “ changes needed” to new and renewed woodlot licenses and cut plans

In Conclusion:

The woodlot licence applicants for Woodlot # 2031 have admirable professional intentions, from a tree harvest perspective. They however, show a major disregard for what is required of a balanced coastal ecosystem which has evolved such that the dominant trees (Douglas Fir / Hemlock) live well beyond 273 years ie. in excess of 1,000 years (Douglas Fir)

They stated that they want to be at the cutting edge of forest ecosystem management with innovative actions and policies compared to views held by forest managers, 1910 - 1970.

While their intentions can be considered as admirable, historical facts more than suggest that they are held economic hostages to the changing whims of Ministers, Bureaucrats and lobbying by the much larger and international Forest Harvesting companies, through organizations such as COFI.

In Forest Management, there is room for timber harvest, **however not** when it means total eradication of trees before they reach only ¼ of their known life expectancy potential! This belief and strategy of growth management is no different than that of a Chicken Feedlot where harvesting takes place on a 8 - 10 week cycle, for birds that can have a productive life for 5 – 10 years. Or for cattle / pigs which are sent to slaughter in 8 – 12 months while under other management conditions they would live 10 - 20 years.

The Woodlot 2031 applicants must re-do their management plan such that all single and clusters of Ancient Trees will remain standing! This could be accomplished by

- a) Ensuring known and yet to be identified polygons are put into forest retention.
- b) Individual and tree clusters must be given a much large buffer of established junior trees, to ensure complete multi-age survivability.
- c) The Ministry of Forests and Range, must enable a land swap lands of size, 2nd growth, comparative economic valued trees and zones of trees which are identified through on the ground silviculture inventories.

Government Policy and Ministerial Directives

- d) The Ministry of Forest and Range must have a consistent Old Growth / Ancient Forest Retention Policy – for ALL companies: large, small, operation in Timber Supply Areas, Tree Farm Licences and Woodlots.
- e) The Policy of Ancient Tree Retention, must be written in such a manner that it cannot be watered down, deleted by successive governments, at the whims of corporations and their economic profits, rates of return, satisfying shareholders equity!

Sincerely,

Rod Burns B. Ed. T-CPHI
Box 348, Heriot Bay
VOP 1HO
250 285 2272
bpc@connected.bc.ca

October 7, 2010

Rod Burns, B.Ed. T-CPHI
Box 348,
Heriot Bay, BC V0P 1H0

Attention: Mr. Burns

This is in response to your letter of September 20, 2010 in which you commented on the Management Plan (MP) for Woodlot Licence W2031, as presented at the public viewing on September 17, 2010. Please note that in our attempt to address your concerns and comments, reference will be made to the Woodlot Licence Plan (WLP) which was also presented at the public viewing. We'll attempt to address your comments in the order they were made.

a) Ancient Forest Retention

There are three biodiversity reserves identified in the WLP that contain old growth (defined in the MP and the WLP as >250 years of age). Two of them consist of an anchor of old growth with second growth recruitment around them, while one is a stand-alone patch of old growth. (Refer to the 1:12000 map in Appendix I of the WLP.)

The three reserves are all quite different in species composition and site index, which is detailed in Table 1 on page 16 of the WLP. The western reserve (BR1) includes old growth Fd, Hw and Cw, as well as second growth PI, Fd and Hw. The central reserve (BR2) is 100% old growth Fd, which is 276 years old. The most eastern reserve (BR3 - the *one* which we spoke with you about during the public viewing) is 17 ha in size and has a mixed species composition, including gnarly old growth Hw, old growth Fd, and some second growth PI, Fd and Hw, as well as a component of Dr (red alder) along a small stream. Over half of the stands in these biodiversity reserves are Fd leading.

As stated in our MP (pages 1 and 2) in the *Old Growth* section – “The old growth strategy in our woodlot will focus on the retention of the areas currently identified as old growth (>250 years of age), with additional riparian areas and wildlife tree patches being managed for old growth attributes where possible. The areas currently identified as old growth will form the anchors of biodiversity reserves aimed at increasing the overall area managed as old growth on the land base.”

Regarding your concerns about single old growth stems and smaller clusters, as stated in both our MP and WLP, they will be assessed on a site specific basis. Old growth trees associated with other resource values (e.g. riparian management areas – RMAs) will be retained where possible (i.e. safe to do so).

Please refer to **pages 7-9 (*Areas Where Timber Harvesting will be Avoided or Modified*)** and **pages 12 -17 (*Wildlife Tree Retention Strategy*)** of the WLP for a detailed description of our ideas for the old growth in the woodlot licence.

b) Applicant's Woodlot Management Plan

Your comments in this part of the letter refer to an Appendix in our MP (Appendix 1 – clearly noted in the table of contents of the MP). The document in the appendix is not our plan. The document in the appendix is clearly titled “Timber Supply Analysis Report”, created in February 2007 by Wolfram Wollenheit. This document was done for the Ministry of Forests and Range (MoFR) to establish the AAC for the woodlot licence before the MoFR advertised the woodlot licence. The assumptions within the “Timber Supply Analysis Report”, which include logging much of the old growth first, are not ours. They are built into the program used to calculate the AAC – Woodlot for Windows – used by the MoFR.

The inclusion of this appendix is a standard requirement, and it must be attached to our MP to show how the AAC was derived (see pages 5 and 6 of the MP for references to the appendix). We use the appendix document as a resource, but not as a guide. It gives information on stand composition and site index – valuable tools for resource management.

Our plans are clearly laid out in both the MP and the WLP that were available for review on September 17, and were sent to you on September 18, 2010. In both these documents we clearly state that we will not be logging the identified old growth stands. Again, please refer to pages 7-9 (*Areas Where Timber Harvesting will be Avoided or Modified*) and pages 12 -17 (*Wildlife Tree Retention Strategy*) of the WLP.

c) Old Growth Retention, as a Ministerial Policy

The comments in this section need to be addressed to the MoFR. We are not in a position to change public policy.

d) Quadra Island Community Plan, and Retention of Ancient Trees, Groves, Forests

We are retaining the identified stands of old growth.

In conclusion:

We appreciate your input and invite you to read both plans – the MP and the WLP.

Comments regarding public policy issues should be addressed to the MoFR.

We feel that our MP and WLP are balanced plans that take into account a variety of values. We are experienced forest professionals who plan to use science and creativity in managing our woodlot licence to maintain a healthy and diverse ecosystem.

Thank you for your interest.

Sincerely,
Chantal Blumel, RPF and Ken Dodd, RPF
PO Box 482,
Ladysmith, BC V9G 1A4
250.245.4291
tamarix@shaw.ca

**COMMENTS ON
QUADRA ISLAND WOODLOT LICENCE W2031
MANAGEMENT PLAN/WOODLOT LICENCE PLAN 2010 to 2020**

Submitted by Sierra Club Quadra Island
Box 487, Heriot Bay, BC
V0P 1H0
sierraquadra@gicable.com

After attending Woodlot 2031's open house on September 17th and reading over the Management Plan and Woodlot Licence Plan, I am submitting the following comments on behalf of the Sierra Club Quadra Island.

There has been years of input into forestry practices on Quadra Island by individuals and organizations such as the Forest Resources Committee (now defunct), Forest Watch, Quadra Island Salmon Enhancement Society, Quadra Island Trails Committee and Sierra Club. One result of this interest and concern was the allocation of a large portion of the crown land on Quadra into a special management zone. Unfortunately, as often happens with government initiatives, many of the important details did not end up in the final plan. When woodlots on Quadra Island were first proposed to the Ministry of Forests by the Forest Resources Committee it was for a number of reasons. For some it was to ensure that locals benefited by getting the woodlots, for some it was to protect tourism values and for others it was to ensure the protection of biodiversity and wildlife. It is unfortunate that the Ministry of Forests has decided to change the criteria for allocating woodlots to the bid system as local knowledge and involvement was an important reason for promoting woodlots on Quadra. We give this summary as a preface to some of our comments and as background information to explain where some of our forestry "understandings" stem from over and above what is required in the Woodlot Licence Planning and Practices Regulations which came years later.

- A commitment to work with local organizations such as the Quadra Island Salmon Enhancement Society and the Quadra Island Trails Committee should be outlined in your Management Plan. The Trails Committee has formal agreements with the Ministry of Environment, Parks and Protected Areas Division for the maintenance and construction of trails in the adjacent provincial parks and with the Ministry of Tourism, Culture and the Arts for trails located within provincial forest.
- The protection of Quadra Island's old growth has always been a high priority for many Islanders. We are pleased to see in your Management Plan (2.4 Old Growth) a commitment to retain all the remaining old growth in WL2031, as well as a recruitment of trees around these veterans. A number of licensees have also committed to retaining any remaining white pine trees.

- The silviculture system and the size of clearcut openings have also been an important issue. We note in your WLP (page 8) that you commit to clearcut openings being kept to 5 hectares or less in areas designated with a VQO of partial retention or modification. Within SMZ 19 on Quadra Island, TimberWest and the majority of woodlot licensees have committed to keeping all of their opening sizes that are located within coniferous forests to 5 hectares or less regardless of the VQO designation. The exemption has been alder patches. Again, one of the main reasons for promoting local woodlots on Quadra was to have alternative harvesting methods and smaller clearcut sizes.
- In your Management Plan under 2.5 Reforestation we are pleased to see that you are committing to manual brushing. However, your statement that “Herbicides will not be considered at this time ” is of concern. One of the main points of agreement amongst groups in the Forests Resources Committee was to stop the use of any herbicides on Quadra Island. TimberWest has also agreed to refrain from using herbicides within SMZ19.
- As mentioned at the open house, a wildlife corridor between the parks was discussed years ago when FENs were still in use. I note that in your Management Plan (2.8 Wildlife) that “Connectivity between the parks to the north and south of the woodlot will be a consideration”. This should be more than a consideration. We believe it is imperative to provide a wildlife corridor between the two parks.
- Vehicle access is a major concern when considering wildlife, biodiversity and the integrity of the parks. As you may be aware tree theft has been a problem within the Main Lake Provincial Park south of Stramberg Lake and within Woodlot 1897. This has been an ongoing problem and tree theft is even occurring in other areas that are in close proximity to main roads. Our concern is increased when the remoteness of your woodlot, the amount of park area that will become vulnerable and the fact that you do not live on the island are considered. The combination of these factors will make it very difficult to monitor the situation.
- As you have noted, your woodlot has a number of lakes located within or adjacent to it. These areas often have high wildlife and biodiversity values. We are concerned about habitat destruction as well as the impact on wildlife due to the increased access to hunters and motorized vehicles.
- Roaded access will also bisect and interfere with any proposed wildlife corridor between the parks.
- Access also increases the potential to introduce invasive plant species. Japanese Knotweed has recently been spotted in the area between Little Main and Main Lake. There is the possibility that either ATV tires or boats helped bring in these plants.

- For many of the reasons previously mentioned, we strongly support any request by the Ministry of Parks to prevent vehicular traffic into the woodlot.
- As noted in riparian management guidebooks, “The riparian areas frequently contain the highest number of plant and animal species found in forests, and provide critical habitats, home ranges, and travel corridors for wildlife. There are no other landscape features within the natural forest that provide the natural linkages of riparian areas”. That is why we have always insisted that all roads be located outside of the RRZ in order to protect these values. Many old roads were built to take advantage of the easiest and cheapest path to a timber supply. On page 8 of your WLP you note, “When a preexisting road is located in a RRZ, and the road is not causing deleterious effects on the stream/wetland/lake values, then the road will be retained in its present location”. However, we feel one of the biggest threats from roads is the access it provides and the resulting human impact. You note on page 20 that there is no other practical place to move the road located within the RRZ of Wolf Lake. As I am sure you have not had an opportunity to walk all of your woodlot, we would like a commitment to continue to try and find an alternative route that will protect the RMA of Wolf Lake.
- When the Main Lake Provincial Park was created the northern boundary was constrained due to TimberWest’s push to keep the road north of Clear Lake out of the Park boundary. We have always felt that this road needs to be moved further north away from the lake to give a wider buffer to the lake. Again, hopefully with the assistance of the ministry, we urge you to relocate the road.
- It is imperative that the park boundaries are protected from blowdown. You note on page 9 of your WLP under *Areas Where Timber Harvesting Will be Modified* that “Areas adjacent to park boundaries, to maintain the integrity of the boundaries. Appropriate methods will be decided concurrent with development, and may include a 25m modified harvest buffer where practical”. We are pleased to see your commitment to protecting the parks. However experience has shown that despite assurances from licensees that they know how to design a cutblock to prevent any blowdown on adjacent reserves, the blowdowns have occurred. We realize that wind directions and strength are difficult to predict, therefore it is imperative that every method be utilized to protect the park boundaries including no cut boundaries and spiral cutting of trees on your woodlot.

Areas Where Timber Harvesting Will be Modified

- You note “Although areas visible from Clear Lake (part of Main Lake Provincial Park) are not identified as a known scenic area, cutblocks visible from Clear Lake will be harvested using a retention silvicultural

system where practical, or if the terrain is suitable, a clearcut system”. Unfortunately, the viewscape from Clear Lake is an example of an area that should have been included in the establishment of scenic areas on Quadra Island. We would like to see the viewscape from Clear Lake mapped as an area of “Modification” on your WLP.

Areas Where Timber Harvesting will be Avoided

- As previously mentioned, we are pleased that all the old growth is included in this category.
- Your WLP notes that, as per regulations, the minimum Wildlife Tree Management Area target retention will be 8% of the Woodlot Licence area. We have always considered this target to be too low to adequately protect biodiversity, and note that the other woodlots have exceeded that target. Some woodlots have more than 20% placed in permanent reserves with additional area committed to stand-level reserves. We hope that you will also treat this percentage as a bare minimum and place more than 8% of your woodlot into reserves.
- We are pleased to see your commitment to reserving 60 meters along the Okisollo Channel with an area of modified harvest abutting this reserve. You note “The VMA consists of the minimum 30m no-harvest buffer along the shoreline within the Retention (R) VQO designated for this known scenic area. An additional 30m no harvest zone will be applied by the woodlot licensee to further protect the scenic resource”. As the area behind the reserve appears to be fairly steep we prefer that alternative methods of harvesting rather than clearcuts be used.
- The RMAs for streams, lakes and wetlands were meant as bare minimum widths in order to protect aquatic ecosystems and wildlife values. Therefore we would like to see these areas considered for additional wildlife tree reserves. For example, Hummingbird Lake is one area we would like to see more area reserved from harvesting. The peninsula, as well as the area to the north of the lake adjacent to Octopus Island Provincial Park appears to be good candidate areas. As mentioned at the open house, an osprey nest has previously been seen sited along the lakes shoreline.
- As the RRZ of the streams and lakes is an area where harvesting is not to occur except for a few exceptions (WLPPR s39), We believe the RRZ should also be included in the *Areas Where Timber Harvesting Will be Avoided* category.
- We would like you to clarify how much of the total RMA is counting towards the minimum Wildlife Tree Management Area target retention of 8%.
 - On page 4 of the Timber Supply Analysis Report it is noted that “The area netdown for RRZs and RMZs together amounts to 49.4

ha, which is 2.9% of the woodlot licence area. Since 8% of the woodlot licence area is legally required to serve as wildlife tree retention area, it is assumed that all of the RRZ and RMZ netdown areas can double as wildlife tree retention areas.”

- On page 12 of your WLP you note “The total area set aside in biodiversity reserves / VMA is 29.1ha (4.1% of the total woodlot licence area). The area within RMAs (RRZs and RMZs) is anticipated to add another 48.4ha to the WTP total, which is 6.8% of the total woodlot licence area. This number is based on the Timber Supply Analysis Report (2007), and will be confirmed, as the RMAs are established concurrent with development”.
- Under *Areas Where Timber Harvesting Will be Modified* you have a table, which shows the percentage of total basal area within the riparian management zone that will be left as standing trees at the completion of harvest. The amounts to be retained range from as low as 5 and up to 20 % of the basal area depending on the riparian classification.
- If all of the RRZ is counting towards that 8% target then the RRZ should be included in the *Area Where Timber Harvesting will be Avoided* section. (As other Licensees have done.)
- If only 5 to 20% of the RMZ is going to be retained then only 5 to 20% of that area should count towards the 8% WTP target. If however the total area of the RMZ has been included in the WTP total (currently at 6.8%) then the entire RMZ should also be included in the *Area Where Timber Harvesting will be Avoided* section.

We look forward to your response.

Regards

Judy Leicester
Conservation Chair, Sierra Quadra

November 1, 2010

Chantal Blumel / Ken Dodd
PO Box 482,
Ladysmith, BC V9G 1A4

Sierra Club Quadra Island
Box 487,
Heriot Bay, BC V0P 1H0

Attention: Judy Leicester, Conservation Chair, Sierra Quadra
Re: Management Plan and Woodlot Licence Plan for Woodlot Licence W2031

Thank you for your thoughtful comments regarding our draft Management Plan (MP) and Woodlot Licence Plan (WLP) for woodlot licence W2031.

As conscientious forest professionals with many years of experience in various aspects of the industry, we feel confident that we can manage woodlot licence W2031 for the many values important to a healthy forest ecosystem. We do not intend to do this in isolation – we have many ties to Campbell River and Quadra Island, and love the area. We hope to become a part of the community and will rely on local expertise. Public consultation is a key principle in the management of Crown lands. In addition to the WLPPR, we have read many different documents in preparing the MP and WLP, including pertinent sections of the Vancouver Island Land Use Plan, the Quadra Plan, species at risk information ... the list goes on.

In your letter you make a number of individual points regarding aspects of the plans and planning process. We will respond to the points as they were presented in your letter.

- We have committed to work with local stakeholders in two sections of the MP – on page 1 under Licensee's Goals; and then on page 3, section 2.12 Recreation. The wording under Licensee's Goals in the MP has been changed slightly from "other stakeholders" to "local stakeholders". Local stakeholders are mentioned in section 2.12 Recreation (page 3 of the MP) in the sentence "Management strategies will be developed over time, working with local stakeholders and government ministries, to maintain and enhance recreational values found throughout the woodlot licence." We've already spoken with a member of the Quadra Island Salmon Enhancement Society regarding Hummingbird Lake, and to various interested parties about a number of trails in the woodlot licence W2031 area. We welcome the chance to work with local organizations.
- Thank you for the support of our intention to retain all identified old growth stands, plus recruit around them. We cannot commit to retaining all the western white pine (Pw) within woodlot licence W2031, but Pw will be retained in the "*Areas where Timber Harvesting will be Modified / Avoided*" (as described in the WLP), and will be assessed on an individual basis within cutblocks as well.

Your comments regarding clarifying maximum clearcut size are appreciated. We are aware of the clearcut size limit (5 hectares or less) stipulated in the VILUP for this part of Quadra Island. We have committed to following the recommendations set out in this document, but we didn't spell that out clearly for the overall woodlot licence. In the MP, we committed to the maximum 5ha clearcut size by indicating that the entire woodlot licence area is within SMZ 19 of the VILUP (page 1 under section 2.3, Silvicultural Systems) when we wrote "The woodlot is within Special Management Zone #19 of the Vancouver Island Land Use Plan, and cutblock size recommendations will be adhered to" but we didn't specify what that size is. We have now added "These recommendations include a maximum clearcut size of 5 hectares" to that section of the MP. Again, in the WLP, we identified VILUP as a higher level plan (page 3, section Government Objectives), with all recommendations to be followed. In addition, on page 4 of the WLP, under *Resource Management Zones, Landscape Units or Sensitive Areas*, we indicated that the whole woodlot licence is within SMZ 19 of the VILUP, and pointed out the primary values and objectives of this SMZ. For clarity, we have added the following comment to that section (page 4, WLP) – "The maximum clearcut size within SMZ 19 is 5 hectares."

- Regarding the use of herbicides, under section 2.5 of the MP (Reforestation), we have deleted the words "at this time" from the sentence "Herbicides will not be considered at this time."
- We considered your comments about linking the two parks with dedicated wildlife corridors. Considering the slow rate of harvest within the woodlot licence area, and the requirement to leave RMAs and WTPs within cutblocks, we do not feel it is necessary at this time. Our harvest rate will be approximately 5-10 hectares per year, in maximum 5 ha clearcuts. There will be a high level of connectivity maintained for wildlife given the biodiversity reserves, RMAs, WTPs and unlogged areas. We cannot commit to dedicated wildlife corridors at this time. As we develop the woodlot licence area, there may be opportunities to create dedicated corridors. That commitment is spelled out within the MP.
- Regarding vehicle access to the woodlot licence area, we share many of your concerns. During consultation with BC Parks, they also indicated a desire to restrict vehicle access to the wilderness areas of Main Lake Provincial Park. We have been in touch with TimberWest and BC Parks about installing a gate once there is vehicle access into the area. Both BC Parks and TimberWest agree that it is necessary.
- To speak further to a number of your specific concerns regarding opening up access:
 - The woodlot licence roads will be narrow and seldom used. Wildlife will be safer than in most areas of Quadra Island.
 - Invasive plant species are a concern, and we are well aware of them. As a member of the Parks, Recreation and Culture Commission for Ladysmith, two other members and I just finished mapping out broom, Japanese knotweed and ivy to treat within the town boundaries. We know about invasive species, know where to find information, and will be on top of them.
- As responsible forest professionals, we have walked a large part of woodlot licence W2031, including the roads past Clear Lake and Wolf Lake (a number of times), to the farthest eastern biodiversity reserve, around Hummingbird Lake,

out through Newton Lake, and up from Waiatt Bay. The road that is within the RRZ of Wolf Lake cannot be practically moved. If your main concern is vehicle access at a later date, then hopefully the above comments about installing a gate will help alleviate those concerns. The road along the southern boundary of woodlot licence W2031 is not within the RMA of Clear Lake, and does not impact on the lake. At this time we cannot justify moving either road. We will maintain the roads to ensure that no negative impacts occur, and will commit to assessing whether there are practical alternatives as development continues.

- In response to your concerns about protecting the park boundaries, our commitment stands as stated. We plan to approach any activities near the park boundaries very cautiously in recognition of the values protected therein. Each situation is unique and will be treated as such. Decisions regarding harvesting adjacent to parks will be made in discussion with BC Parks staff.
- *Areas Where Timber Harvesting will be Modified*
We cannot establish VQOs in areas visible from Clear Lake – only the District Manager of the Ministry of Forests has the mandate to establish scenic areas and subsequent VQOs, as per the Government Actions Regulation under the Forest and Range Practices Act. In our WLP (page 8), we are clear in our commitment to keep the visual impacts of any harvesting in that area to a minimum and using modified harvesting practices to achieve that goal.
- *Areas Where Timber Harvesting will be Avoided*
 - We appreciate your support of our intention to retain all identified old growth stands.
 - The area behind the VMA along Okisollo Channel is within Partial Retention and Modification VQOs (refer to the map in Appendix IV of the WLP), and as such there is already a commitment to use modified harvesting methods, as stated in the section *Areas Where Timber Harvesting will be Modified* (page 8 of the WLP).
 - We will include the RRZ's in the *Areas Where Timber Harvesting will be Avoided* section as the other licensees have done. We did not do so originally because these areas are already strongly established within forestry legislation.
 - The following statement will include comments on a number of points within your letter under the above header.
 - First, we'd like to clarify the seeming discrepancy of the total area of the RMA counting toward the Wildlife Tree Management Area. As you indicate, the Timber Supply Analysis Report shows a total 49.4ha netdown for RMAs, and our WLP shows a total of 48.4ha. We removed 1ha from the Timber Supply Analysis Report netdown area because we know that one hectare is within our Visual Management Area (VMA) along Okisollo Channel. It would be double-dipping to include it again under the RMA netdown area. Currently, using the 48.4ha of RMA from the Timber Supply Analysis Report plus the 29.1ha of voluntary reserves committed to in our WLP, there is a total of 77.5ha retained toward the Wildlife Tree Management Area. This is 10.8% of the woodlot licence area. We will be adding more areas in smaller cutblock wildlife tree patches (WTPs), and anticipate an increase in RMA area over time as stream classification and mapping occurs concurrent with development.

- The table on page 9 of the WLP, under *Areas Where Timber Harvesting will be Modified* showing percentage of basal area to be retained within the riparian management zone for various stream classifications is, to our knowledge, legally required to be included in the WLP. The values presented in this table are bare minimums mandated by the Ministry of Forests, and don't reflect our planned management. We will be assessing each stream individually and plan to use streams as anchors for biodiversity reserves.
 - We cannot fairly include any more area than the RRZs into the section *Areas Where Timber Harvesting will be Avoided* because we haven't classified all the streams yet. That will be an ongoing process, as it usually is. In the next WLP, there will be a more accurate estimation of the RMAs that will not be harvested etc.
- Regarding the comment about retaining more than the bare minimum RMA, especially around lakes, that is something that we are planning to do. Again, it will be a case by case basis as we go along. However, we will commit to retaining at least the full RMA along the stream heading north from Hummingbird Lake into Octopus Islands Provincial Park. Other areas will be assessed on a site specific basis.
 - All pertinent legislation regarding raptor nests will be followed. Based on your reports, we will search areas associated with all lakes for the presence of osprey nests prior to development.

This letter and your letter will form part of the final submission of the MP and WLP for woodlot licence W2031, but if you have any more questions or concerns, please feel free to contact us.

Sincerely,

Chantal Blumel, RPF
Ken Dodd, RPF

From: [Chantal Blumel](#)
Sent: Tuesday, September 21, 2010 12:24 PM
To: [Judy Leicester](#)
Subject: Re: Woodlot 2031 Plans Question

Judy

We don't think so. If in the future we find that a change has to be made, we will come up with a rationale and numbers to support that.

Chantal

From: [Judy Leicester](#)
Sent: Monday, September 20, 2010 11:50 AM
To: [tamarix](#)
Subject: Re: Woodlot 2031 Plans Question

Chantal

Thanks, that does clear it up. Will your AAC change because you are not cutting those old growth?

Judy

----- Original Message -----

From: [tamarix](#)
To: [Judy Leicester](#)
Sent: Sunday, September 19, 2010 8:00 PM
Subject: Re: Woodlot 2031 Plans Question

Judy,

We had to clarify that issue for a few people at the open house as well.

The document you looked at is the **appendix** to our Management Plan. If you look at the cover page of the appendix you'll note it is a Timber Supply Review done in February 2007 by Wolfram Wollenheit. The Timber Supply Review is the document that analyses the forest polygons in the woodlot licence area and, based on a complicated process, figures out the Allowable Annual Cut (AAC) for the woodlot. The Ministry of Forests requires that the Timber Supply Review be added as an appendix to the Management Plan to show how the AAC was derived. The Timber Supply Review was done by Wolfram for the Ministry of Forests to determine an AAC for the woodlot prior to advertising the woodlot licence. One of the assumptions made within that document was that the old growth would be logged first. We decided that we didn't want to log the old growth (>250 years), and that is reflected in **our** plans and maps - those you looked at during the open house. It is confusing, and I'm glad you asked the question. Again - we have no plans to log the old growth polygons that are shown as reserves on our maps.

Please let me know if this is clear - if not, I'll be happy to try to explain it more clearly.

Cheers.
Chantal Blumel

----- Original Message -----

From: [Judy Leicester](#)

To: [tamarix](#)

Sent: Sunday, September 19, 2010 11:05 AM

Subject: Re: Woodlot 2031 Plans Question

Tamarix

Just did a very initial glance at your management plan. My first question is that there appears to be an discrepancy between your commitment not to cut the old growth and your present harvest opportunities which note.

The program scheduled for the next 5 years the following

polygons for harvesting (in this order): 1326, 1347, 1270, 1319,

1322, 1535, 1630, 1616, 1631, 1527, 1430, 1514, and 1445. The

first 5 stands are old-growth Douglas-fir leading, which is almost

all that is left in the woodlot licence. The remainder of the

scheduled stands consists predominantly of mature hemlock.

I compared the polygons and you do have the polygons included in your harvesting plans that are also noted as your old growth reserves. Could you please explain.

Judy

----- Original Message -----

From: [tamarix](#)

To: [Judy Leicester](#)

Sent: Saturday, September 18, 2010 8:55 PM

Subject: Re: Woodlot 2031 Plans

Judy,

It was good to meet you yesterday.

Here are the plans (the WLP is in the next email). If you have any questions or comments please contact us. All written comments of any changes you'd like considered must be in to us by October 18. Email is fine.

Thanks for your interest.

Chantal Blumel and Ken Dodd

250.245.4291

PO Box 482

Ladysmith, BC V9G 1A4

tamarix@shaw.ca

----- Original Message -----

From: [Judy Leicester](#)

To: tamarix@shaw.ca

Sent: Thursday, September 16, 2010 5:09 PM

Subject: Woodlot 2031 Plans

Chantal Blumel

Please email me a copy of your Woodlot Licence Plan and draft Management Plan for your Woodlot 2031. If the files are large please send each plan in a separate email.

Thanks

Judy Leicester

d) Revisions Made as a Result of Written Comments Received

Page 4: Add “The maximum clearcut size within SMZ 19 is 5 hectares” under the section *Resource Management Zones, Landscape Units or Sensitive Areas*.

Page 7: Under the section *Areas Where Timber Harvesting will be Avoided*, add the following.

- In the *Visuals* section add “Retaining the VMA will also accommodate the potential for trail construction.”
- An *RRZ* section – “RRZs will have restricted harvesting except for the purposes of section 39 of the WLPPR. If additional streams requiring RRZs are discovered during operational planning, they will be protected with similar harvest constraints. Due to the scale of the WLP map, the RRZs are not represented separately.”
- A section stating “The full Riparian Management Area (RMA) will be retained from harvest along the stream running north from Hummingbird Lake into Octopus Islands Provincial Park, to retain forested connectivity for various wildlife species. This is not represented on the map, but is a commitment within this WLP for woodlot licence W2031.”

2. FIRST NATIONS CONSULTATION

RECORD OF CONSULTATION

DATE	FIRST NATION	ACTION
August 23, 2010	We Wai Kai (Cape Mudge) (briank@wewaikai.com)	Emailed Brian Kelly to try to arrange a meeting for August 27, to drop off a paper copy of the draft WLP for woodlot licence W2031
August 24, 2010	We Wai Kai (250-285-3316)	Called Brian Kelly to try to arrange meeting – on other line – left message with reception for him to please call back re yesterday's email / draft WLP
August 28, 2010	We Wai Kai (Cape Mudge) Wei Wai Kum (Campbell River) Xwemalhwu (Homalco) Klahoose K'omoks Laich Kwil Tach Treaty Society Nanwakolas Council Referrals Office Gordon Atkinson (Homalco FN consultant)	Sent digital copies of draft WLP to all First Nations, as well as a formal letter indicating some information about W2031, date and time of the open house, and contact name and number. Again requested a meeting with We Wai Kai.
August 30, 2010	Laich Kwil Tach Treaty Society	Received a phone call requesting a call back re the WLP (from reception at LKTTS). Received an email requesting an update to our records regarding who we send the draft documents to. We were ok with Bill Pollard with the Wei Wai Kum, but Ted Lewis is the Forest Manager for the We Wai Kai (not Brian Kelly) so should send him a digital copy and talk to him. Reception indicated that they had forwarded a digital copy of the draft WLP and letter to Ted Lewis.
September 7, 2010	Laich Kwil Tach Treaty Society	Phoned reception to discuss their concern about the draft WLP – passed onto Shirley Johnson, who requested that emails be sent to the reception email address. She hadn't seen the draft WLP yet but would take a look and relay any concerns. She indicated that a meeting with the We Wai Kai was not necessary. I mentioned the public viewing on September 17, and the review and comment deadline of October 18.

September 13, 2010	We Wai Kai First Nation	Called and left a message for Ted Lewis regarding the draft WLP: Did he get a copy? Any comments? Did he want to meet to discuss it prior to the open house?
September 14, 2010	We Wai Kai First Nation	Called and spoke with Ted Lewis. He hadn't seen the draft WLP but we spoke about how the woodlot licence area abuts W1970 and road access issues /possibilities. He indicated that likely they'd have no concerns, but that any comments would go through the Laich Kwil Tach Treaty Society. He said a meeting wasn't necessary. I mentioned the open house on September 17 at the Quadra Island Community Centre.
October 4, 2010	We Wai Kai (Cape Mudge) Wei Wai Kum (Campbell River) Xwemalhwu (Homalco) Klahoose K'omoks Laich Kwil Tach Treaty Society Nanwakolas Council Referrals Office	Sent a digital reminder to all that the deadline to provide written comments regarding the draft WLP for W2031 is October 18, 2010.
October 13, 2010	Laich Kwil Tach Treaty Society	Received an email from LKTTS (Shirley Johnson) that they couldn't find a letter or copy of the draft WLP for W2031.
October 14, 2010	Laich Kwil Tach Treaty Society	- 5am Emailed another copy of the draft WLP to the LKTTS, indicating that the first copy had been sent on August 28, 2010. - 2 pm Received another email from LKTTS indicating that they couldn't find it, and requesting that all future plans be sent by mail. (Did not see this until the next day) - 4pm Received a faxed letter response to the draft WLP from LKTTS.
October 15, 2010	Laich Kwil Tach Treaty Society	Responded to the previous email by indicating that the second copy of the WLP should have been right at the top of the email, and that if a paper copy was preferable, that could/should have been mentioned during our

		conversation on September 7, 2010. Sent another copy of the draft WLP. Indicated that the fax had been received. Started working on a reply.
November 22, 2010	Laich Kwil Tach Treaty Society	LKTTS (Shirley Johnson) called and indicated that the October 14, 2010 letter was incorrect and that they would fax another one.
November 24, 2010	Laich Kwil Tach Treaty Society	Called LKTTS (Shirley Johnson) regarding her call of November 22, and she faxed a revised letter to replace the original October 14 letter. Started working on a reply.
January 10, 2011	Laich Kwil Tach Treaty Society	Faxed letter response to LKTTS and called to confirm it got through.
June 19, 2011	We Wai Kai (Cape Mudge) Wei Wai Kum (Campbell River) Xwemalhkwa (Homalco) Klahoose K'omoks Laich Kwil Tach Treaty Society Nanwakolas Council Referrals Office Gordon Atkinson (Homalco FN consultant)	Sent digital copies of formal letters outlining the submission of the final WLP for woodlot licence W2031. Faxed the letter to Laich Kwil Tach Treaty Society as well.

Names / Emails/ Numbers Used

We Wai Kai FN – Ted Lewis, Forestry Manager – 250.285.3316;
reception@wewaikai.com;

Wei Wai Kum FN – Chief Bill Pollard – 250.286.6949
bpollard@crband.ca;

Homalco (Xwemalhkwa) FN:
- Chief Richard Harry – 250.923.4979
robert.harry@homalco.com;
- Gord Atkinson, Advisor, Coast Forest Management,
1.250.729.9169; gka@cfm.bc.ca

Klahoose FN – Chief Ken Brown – 250.935.6536; kenbrown@klahoose.org

K'omoks FN – Melinda Knox – 250.339.4545; melindaknox@comoxband.ca

Laich Kwil Tach Treaty Society – Shirley Johnson – 250.287.9460;
reception@lkts.ca

- requested faxed documents – 250.287.9469
- member nations – We Wai Kai and Wei Wai Kum FN

Nanwakolas - Nanwakolas Council Referrals Office – 250.286.7200;
referrals@nanwakolas.com

- member nation – K'omoks FN

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Chief Ralph Dick and Council
We Wai Kai First Nation
PO Box 220,
Quathiaski Cove, BC
V0P 1N0

Attn: Ted Lewis

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Chief and Councillors:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback. Phone calls to discuss the plan and offering a meeting also occurred in August/September 2010. The Laich Kwil Tach Treaty Society received a copy of the draft WLP, and their comments were addressed in the final version.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc Laich Kwil Tach Treaty Society

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Chief Robert Pollard and Council
Wei Wai Kum First Nation
1400 Weiwaikum Road,
Campbell River, BC
V9W 5W8

Attn: Chief Bill Pollard

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Chief and Councillors:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback. The Laich Kwil Tach Treaty Society received a copy of the draft WLP, and their comments were addressed in the final version.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc Laich Kwil Tach Treaty Society

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Chief Richard Harry and Council
Homalco (Xwemalhkwu) First Nation
1218 Bute Crescent,
Campbell River, BC
V9H 1G5

Attn: Gordon Atkinson,

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Chief and Councillors:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc Gordon Atkinson, Advisor, Coast Forest Management

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Chief Ken Brown and Council
Klahoose First Nation
Box 9,
Squirrel Cove, Cortes Island, BC
V0P 1K0

Attn: Chief Ken Brown,

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Chief and Councillors:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Chief Ernest Hardy and Council
K'omoks First Nation
3320 Comox Road,
Courtenay, BC
V9N 3P8

Attn: Chief Ernest Hardy,

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Chief and Councillors:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc Nanwakolas Council Referrals Office

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Council of Chiefs
Laich Kwil Tach Treaty Society
1441 Old Island Highway
Campbell River, BC
V9W 2E3

Attn: Rod Naknakim,

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Council of Chiefs:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback. Your letter of response was received in November 2010, and the concerns were addressed in the final version of the WLP.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc We Wai Kai First Nation
Wei Wai Kai First Nation

June 19, 2011

Chantal Blumel
PO Box 482
Ladysmith, BC
V9G 1A4
250.245.4291
tamarix@shaw.ca

Nanwakolas Council Referrals Office
203-2005 Eagle Drive,
Campbell River, BC
V9H 1V8

Attn: Art Wilson,

Re: Final Submission of Woodlot Licence Plan (WLP) for Woodlot Licence W2031

Dear Nanwakolas Council Referrals Office:

Please be advised that the final WLP for woodlot licence W2031 will be submitted to the Ministry of Forests, Lands and Natural Resource Operations (FLNR) on Friday, June 24, 2011.

A digital copy of the draft WLP was sent to you in August 2010, requesting feedback.

A digital copy of the final WLP will be available on the North Island Woodlot Association website, and on the FLNR website. A paper copy will be available at the FLNR office in Campbell River.

Please feel free to contact us if you have any comments.

Respectfully,

Chantal Blumel, RPF

Cc K'omoks First Nation

January 4, 2011

Chantal Blumel, RPF
PO Box 482,
Ladysmith, BC
V9G 1A4

Laich-Kwil-Tach Treaty Society
1441 Old Island Highway,
Campbell River, BC
V9W 2E4

Attention: Rod Naknakim
Re: Woodlot Licence W2031

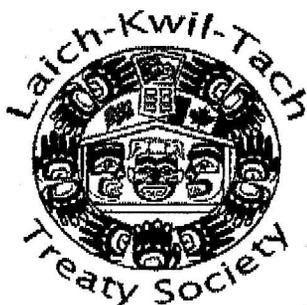
This letter is in response to your letter of November 24, 2010, which replaces your letter of October 14, 2010.

Thank you for your interest and your thoughtful response to our draft Woodlot Licence Plan for woodlot licence W2031. We agree that a field tour of the woodlot licence area will be valuable in identifying any cultural heritage resources which are of significant value to members of the Laich-Kwil-Tach member nations. Currently, the access to W2031 is limited due to a removed bridge several kilometers from the actual woodlot licence boundary. Once we have vehicle access, we would welcome the opportunity to do a field tour of the woodlot licence area with two representatives of LKTS member nations. During that field tour we can discuss our plans for the future, and address any questions and/or concerns. A tour such as this is consistent with our stated goal of maintaining meaningful ongoing communication with members of the First Nations communities who have an interest in the Quadra Island area.

As professional foresters, we recognize the importance of First Nations interests in the woodlot licence area. The draft Woodlot Licence Plan (WLP) for woodlot licence W2031 outlines our commitments to maintain communications with First Nations, and how we plan to protect identified critical Cultural Heritage Resources (CHR) such as traditionally used plants and western redcedar. For further details please refer to pages 10 and 11 of the draft WLP. The draft WLP commits to retaining all identified stands of old growth (>250 years old), thereby protecting the areas with the highest potential to contain undisturbed culturally modified trees (CMTs). As well, it identifies some of the methods that we plan to employ to maintain western redcedar within the forest. Ongoing and unrestricted access to woodlot licence W2031 for cultural purposes as currently practiced is clearly stated within the WLP.

Sincerely,

Chantal Blumel / Ken Dodd



Laich-Kwil-Tach Treaty Society

1441 Old Island Highway
Campbell River, B.C.
V9W 2E4

Tel: (250) 287-9460

FAX: (250) 287-9469

Toll free: 1-888-900-5720

e-mail: reception@lkts.ca

November 24, 2010 .

Chantal Blumel, RPF
Box 482
Lady Smith, BC V9G 1A4
Fax 250-245-4291

Dear Mr. Blumel:

Re: Woodlot Licence W2031 North of Clear Lake on Quadra Island

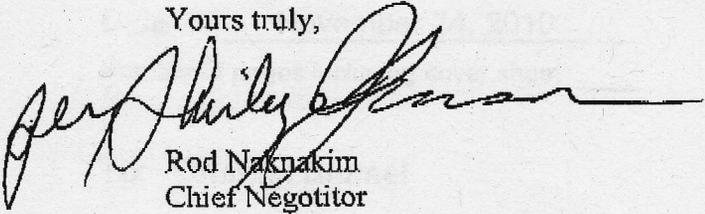
Please disregard letter of Oct 14, 2020. The Laich-Kwil-Tach Treaty Society (formerly the Hamatla Treaty Society) represents its member Nations, the We Wai Kai (Cape Mudge Band), Wei Wai Kum (Campbell River Band) and Kwiakah (Phillips Arm).

As the courts have confirmed on numerous occasions, both the Provincial and the Federal Governments owe a fiduciary duty of utmost good faith to First Nations. The Supreme Court of Canada made it clear in *Delgamuukw* that this duty can only be satisfied by the involvement of First Nations in decisions taken with respect to our Lands. The Court then went on to say "There is always the duty of consultation." (para.168). This consultation must, at a minimum, be in good faith with the intention of substantially addressing the concerns of the First Nation whose lands are at issue." The BC Court of Appeal in its February 2002 decision in *Council of the Haida Nation* has further clarified this obligation by confirming that your government is obliged to make an initial assessment of our rights and must not only engage in meaningful consultation, but also must seek an accommodation of our interests (including cultural and economic ones).

We have many Traditional Use and Archaeological Sites in the Area. This area was well utilized by the Laich-Kwil-Tach people. The LKTS have no concerns with this woodlot. But when they are ready to engineer the blocks because of the area we would like to have them reconed with two of our member Nations. To arrange this contact Shirley at tus@lkts.ca.

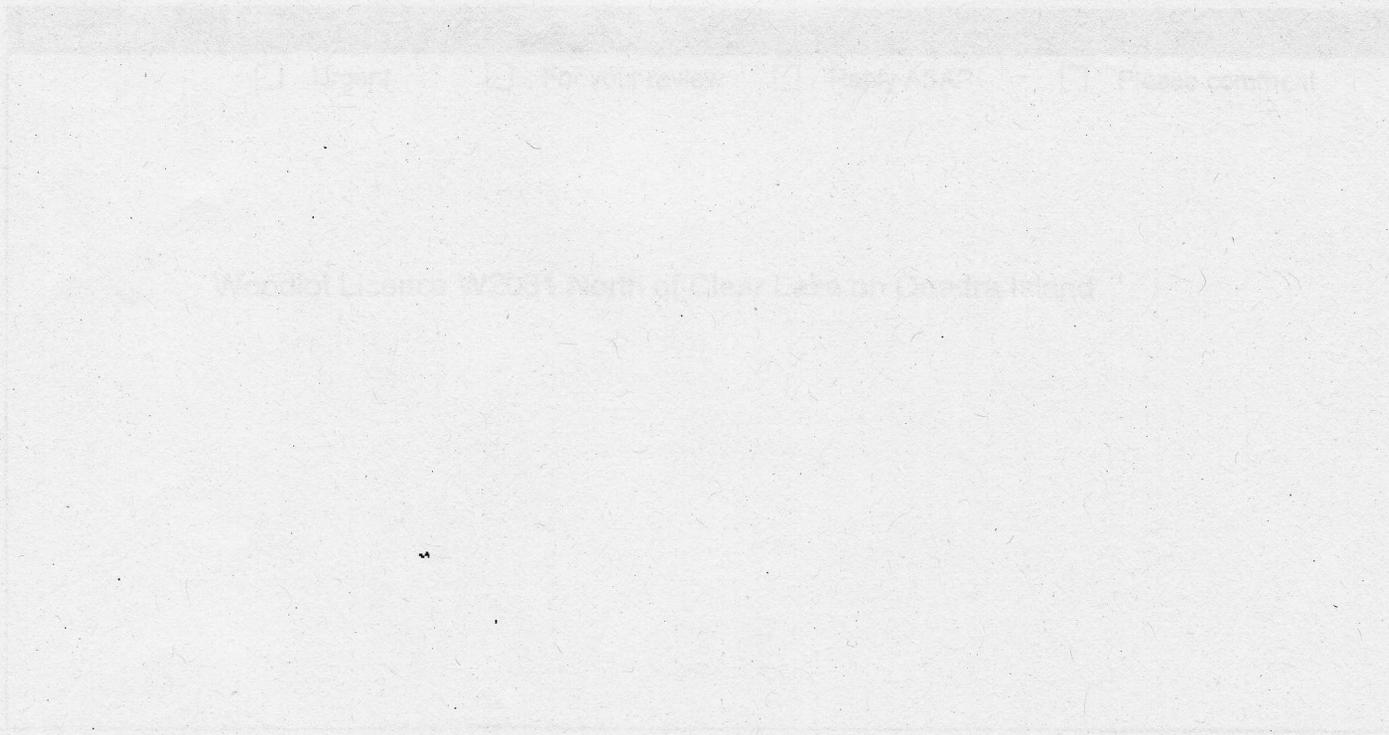
We may choose to address the issues of Aboriginal rights and title infringement and compensation with respect to this project through the treaty process. We also reserve the right to raise objections if any cultural use or archaeological sites are identified when the project is being carried out. Or if we discover impacts on our rights or interest that we have not foreseen.

Yours truly,



Rod Naknakim
Chief Negotiator

cc Member Nations



Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Chief Ralph Dick and Council
We Wai Kai First Nation
PO Box 220,
Quathiaski Cove, BC
V0P 1N0

Attn: Brian Kelly

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Chief and Councillors:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the We Wai Kai First Nation.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca , by phone at 250-245-4291, or in writing at the above address.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc Laich Kwil Tach Treaty Society

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Chief Robert Pollard and Council
Wei Wai Kum First Nation
1400 Weiwaikum Road,
Campbell River, BC
V9G 5W8

Attn: Dean Drake

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Chief and Councillors:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the Wei Wai Kum First Nation.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca or phone at 250-245-4291.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc Laich Kwil Tach Treaty Society

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Chief Richard Harry and Council
Xwemalhkwa (Homalco) First Nation
1218 Bute Crescent
Campbell River, BC
V9H 1G5

Attn: Gordon Atkinson

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Chief and Councillors:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the Xwemalhkwa First Nation.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca or phone at 250-245-4291.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc Gordon Atkinson, Advisor, Coast Forest Management

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Chief Ken Brown and Council
Klahoose First Nation
Box 9,
Squirrel Cove, BC
V0P 1K0

Attn: Chief Ken Brown

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Chief and Councillors:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the Klahoose First Nation.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca or phone at 250-245-4291.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Chief Ernest Hardy and Council
K'omoks First Nation
3320 Comox Road,
Courtenay, BC
V9N 3P8

Attn: Jenny Miller or Melinda Knox

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Chief and Councillors:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the K'omoks First Nation.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca or phone at 250-245-4291.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc: Nanwakolas Council Referrals Office

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Council of Chiefs
Laich Kwil Tach Treaty Society
1441 Old Island Highway,
Campbell River, BC
V9W 2E3

Attn: Rod Naknakim

Re: Woodlot Licence W2031 Woodlot Licence Plan

Dear Council of Chiefs:

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the We Wai kai and Wei Wai Kum First Naitons.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca or phone at 250-245-4291.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc: We Wai Kai First Nation
Wei Wai Kum First Nation

Chantal Blumel
PO Box 482,
Ladysmith, BC
V9G 1A4

August 28, 2010

Nanwakolas Council Referrals Office
203 – 2005 Eagle Drive,
Campbell River, BC
V9H 1V8

Attn: Art Wilson

Re: Woodlot Licence W2031 Woodlot Licence Plan

Please find attached a digital copy of the initial draft Woodlot Licence Plan (WLP) for woodlot licence W2031 for your consideration.

Woodlot licence W2031 is located on northeastern Quadra Island between Main Lake Provincial Park and Octopus Islands Provincial Park and falls within the traditional use area of the K'omoks First Nation.

The public viewing of this draft WLP will be on September 17, 2010, from 4:30 to 8:30pm at the Quadra Island Community Centre, Room 1.

If you have any questions, comments or concerns, please feel free to contact us by email at tamarix@shaw.ca , by phone at 250-245-4291, or in writing at the above address.

Thank you for your time.

Chantal Blumel, RPF
Ken Dodd, RPF

Cc: K'omoks First Nation

January 4, 2011

Chantal Blumel, RPF
PO Box 482,
Ladysmith, BC
V9G 1A4

Laich-Kwil-Tach Treaty Society
1441 Old Island Highway,
Campbell River, BC
V9W 2E4

Attention: Rod Naknakim
Re: Woodlot Licence W2031

This letter is in response to your letter of November 24, 2010, which replaces your letter of October 14, 2010.

Thank you for your interest and your thoughtful response to our draft Woodlot Licence Plan for woodlot licence W2031. We agree that a field tour of the woodlot licence area will be valuable in identifying any cultural heritage resources which are of significant value to members of the Laich-Kwil-Tach member nations. Currently, the access to W2031 is limited due to a removed bridge several kilometers from the actual woodlot licence boundary. Once we have vehicle access, we would welcome the opportunity to do a field tour of the woodlot licence area with two representatives of LKTS member nations. During that field tour we can discuss our plans for the future, and address any questions and/or concerns. A tour such as this is consistent with our stated goal of maintaining meaningful ongoing communication with members of the First Nations communities who have an interest in the Quadra Island area.

As professional foresters, we recognize the importance of First Nations interests in the woodlot licence area. The draft Woodlot Licence Plan (WLP) for woodlot licence W2031 outlines our commitments to maintain communications with First Nations, and how we plan to protect identified critical Cultural Heritage Resources (CHR) such as traditionally used plants and western redcedar. For further details please refer to pages 10 and 11 of the draft WLP. The draft WLP commits to retaining all identified stands of old growth (>250 years old), thereby protecting the areas with the highest potential to contain undisturbed culturally modified trees (CMTs). As well, it identifies some of the methods that we plan to employ to maintain western redcedar within the forest. Ongoing and unrestricted access to woodlot licence W2031 for cultural purposes as currently practiced is clearly stated within the WLP.

Sincerely,

Chantal Blumel / Ken Dodd

3. EXEMPTIONS

4. RATIONALE IN SUPPORT OF PROPOSED ALTERNATIVE PERFORMANCE REQUIREMENTS