

**Public Review
Of
Draft Management Plan No. 3**

**(October 23rd, 2000 – November 21st, 2000)
(February 7th, 2001 – March 9th, 2001)**

-

April 9, 2001

Mr. Bruce Davies
Box 2
Surge Narrows, B. C.
V0P 1W0

Dear Mr. Davies,

Thank you for your letter of March 15, 2001 in which you provide comments on draft Management Plan No. 3 for TFL 47.

We have extracted the main points you are making and added our response.

- 1) The new proposed harvest level would not be sustainable as a Long Run Harvest Level (LRHL) after MP 3.

Argument 1:

- ◆ Simulated harvest models "oldest first". However, the remaining old-growth stands are the least productive.
- ◆ Instead of harvesting the 2nd growth after the old-growth, the reality is that the 2nd growth will be harvested either prior to or in parallel with the old-growth. Consequently, at harvest, the 2nd growth will be 5 years younger in age than that predicted by the timber supply analysis.
- ◆ Therefore, the yield at harvest will be less than the simulated harvest yields.

TimberWest response:

In the MP 2 Timber Supply Analysis, the sensitivity of "oldest first" queuing order was tested by simulating a "youngest first" harvest rule (page 15, TFL 47 MP 2 Timber Supply Analysis, Sept., 1996). The "youngest first" rule resulted in a long-term harvest reduction of 7-8%. While it can be argued the "oldest first" rule is not realistic, it can equally be argued that a "youngest first" rule is even more unrealistic. TimberWest would expect a more realistic harvest rule to result in a long-term harvest reduction of 3-4%.

We appreciate the point you are making and are prepared to add a sensitivity run on this issue in order to provide more certainty.

Argument 2:

- ♦ The model fails to capture the complexity of the spatial relationships and harvesting will likely be more constrained by green-up, visual etc. than is predicted by the simulation.

TimberWest response:

The 20 year plan lays out a hypothetical series of harvest blocks which meet the spatial requirements (green-up, VQO, riparian etc.) of the Forest Practices Code and verifies that the simulated harvest rates can be achieved on the ground. The 20-Year Plan for MP 3 shows an average harvest of 569,000 m³/year.

Argument 3:

- ♦ The increase in harvest rate for MP 3 was not predicted in MP 2.

TimberWest response:

The MP 2 Timber Supply Analysis base case predicted a long-term harvest level of 570,000 m³/year. (page 7 and page 9 figure 6-2 – TFL 47, MP 2 Timber Supply Analysis Sept., 1996). However, at the time of the MP 2 timber supply analysis the Forest Practices Code was not fully accounted for. In recognition of this uncertainty, TimberWest proposed a reduction in harvest levels of 145,000 m³/year.

Argument 4

- ♦ The THLB has decreased 10% since 1996. Timber harvest should follow this trend and also decrease the harvest level.

TimberWest response:

The decrease in the Timber Harvesting Land Base (-13%) has been off-set by a predicted increase in timber yields. The methodology for estimating stand yields (m³/ha.) used in MP 2 was found to be incorrect. The revised methodology used in MP 3 resulted in an average yield increase of 12.8%. The revised yield estimates were verified in the recently completed inventory audit undertaken by the Inventory Branch of the Ministry of Forests on the Johnstone Strait management unit of TFL 47.

	MP 2	MP 3	% Difference
Total Landbase (ha)	101,809	101,847	0.0%
Current THLB (ha)	82,002	71,313	-13.0%
Long-Term Harvest Rate (Base case – simulated long-term harvest rate) – m ³ /year	570,000	559,350	-1.9%
Average MAI (Total Landbase) - m ³ /ha/year	5.60	5.49	-1.9%
Average THLB MAI - m ³ /ha/year	6.95	7.84	12.8%

2) Even if the LRHL of 559,300 m³/yr was achievable after MP 3, it is an unworthy goal.

- ♦ A more gradually increased harvest rate over time will lead to a greater LRHL around the Culmination of Mean Annual Increment over time.
- ♦ The large, hasty increase in harvest rates proposed in MP 3 will result in future harvest deductions.

TimberWest response:

The sensitivity to minimum harvest age (section 4.1.2, TFL 47, MP 3 Timber Supply Analysis) shows that:

“First entry ages offer a higher sustainable harvest level over the short and medium term. Using culmination age, the resulting reduced harvest flexibility constraints overall harvest opportunity. However, the increased growing stock available under culmination age results in a slight (19,800 m³ per year) increase in the long-term harvest rate to 579,150 m³ per year.”

TimberWest believes the current Management Plan process, which revisits the issue of timber supply every 5 years mitigates the potential for future harvest reductions.

We would like to thank you for your interest in the management of TFL 47 and the time taken to review and comment on draft Management Plan No. 3.

A summary of all public comments together with our response will be submitted to the Ministry of Forests.

Thank you,

Yours truly,

Gilbert Brennenstuhl
for TimberWest Forest Corp.

Jim Mc
Bruce S.

Steve Co

Leary P.

Donnell M.

B. Davies
Box 2
Surge Narrows, BC
V0P 1W0

March 15, 2001

TimberWest Forest Ltd.
Attention: G.M. Brennenstuhl, RPF
PO Box 11101
Vancouver, B.C. V6E 3P3

Dear Mr. Brennenstuhl:

This letter is in response to your January 31 invitation for public comment on Management Plan Number 3 (MP3), for TFL 47. My comments focus on MP3's harvest level and Timber Supply Analysis for the Johnstone Strait Unit of the TFL.

MP3 should not make any increase to harvest level in the Johnstone Strait Unit. MP3 should not be proposing an increase of 31 %, which would make a harvest level of 559,350 m / yr. The reason for these statements is basically the same as in my September 20, 1999 critique of the 24% increase in MP2. I have two main points of criticism about MP3's Johnstone Strait harvest level and I will restate my complaints about the Units Timber Supply Analysis.

(1). The new proposed harvest level would not be sustainable as a Long Run Harvest Level (LRHL) after MP3, the way it is sustained in the Base Case simulation. The proposed increase would be another increment that is too large and too soon, considering the state of Timber supply. MP3's proposal would raise the harvest level so much that it would cause supply problems. That outcome is unacceptable.

(2). Even if an LRHL of 559,350 m / yr was achievable after MP3, it is an unworthy goal. This LRHL is less than the potential LRHL that could be achieved if the increases to harvest level were introduced more gradually, over a longer time frame, leading to older long run harvest ages around the Culmination of Mean Annual Increment (CMAI). Compared with the long run results of more moderate transitional harvest levels, MP3's purported LRHL is the sign of a partly depleted resource where

the same or more area must be cut for less than the potential volume / year. A combination of depressed timber benefits, and greater costs from all perspectives, is an undesirable outcome.

An understanding of these two problems has been obfuscated by an aberration in the Timber Supply Analysis (TSA) in both MP2 and MP3. A discussion of the TSA's will also expand on and support the points (1) and (2) above.

Like MP2, MP3's TSA simulates the harvest of the oldest stands first. It appears that MP3, in simulation, cuts the same or much of the same stands as were cut in MP2's simulation. For analysis it is relevant that these stands are the least productive, being old and on the poorest sites. This is in contrast to the real harvesting in Johnstone Strait which is and will be in fast growing second growth stands that the simulation does not harvest until about five years later. The stands that are actually cut in MP3 are 5 years less in age and in growth, and so would be the stands that would actually be cut right after MP3 and onward. At the end of MP3 this effect is continued rotations that are younger by 5 years than they are in the simulation. Since we are looking at the steep younger side of the MAI curves, LRHL is substantially less when rotation age is five years younger.

Further, the relation between long run rotation and spatial harvest rate is the multiplicative inverse or hyperbolic relation. Therefore, the real spatial harvest rate would be much greater than it is in the simulation. This makes it possible or likely that the real harvesting would come up against the spatial constraints of green up, visual, etc., creating temporary dips in the real future harvest level - dips that do not occur in the simulation.

I note that the MP2's harvest flow did not show a big increase to harvest level in the MP3 time frame. The Chief Forester also noted that "In all three forecasts [Johnstone Strait, Nanaimo Lakes and Courtenay] the transition to higher long term harvest levels is projected to occur over the next two decades." (Rationale for AAC Determination, 1996, p. 13)

Another important factor is that the Timber Harvest Land Base (THLB) in the Johnstone

Strait Unit has shrunk by about 10% since 1996. Timber expectations should adjust for this instead of doing the opposite.

Like LRHL and future harvest age, the growing stock predictions in the TSA are also inflated compared with what the real results will be. In 1999 I wrote that the Growing Stock Curve for MP2 would be flat instead of increasing as simulated in the TSA (below left). I believe I was roughly accurate and the further reductions for MP3 (below right) are caused by the reductions to THLB and by the new 31% increase to harvest level in MP3. Because of the oldest first simulation syndrome, MP3's growing Stock Curve will decline in reality even worse than is shown - more than 5% worse. This resource is plainly heading toward a seriously depleted condition.

*Johnstone Strait Growing Stock
MP2 and MP3 - same vertical scale.*

4.1.1.1 Growing Stock

In the Base Case, after an initial decline for 50 to 60 years, the growing harvestable landbase gradually increases. (figure 3)

Figure 3. The predicted volume of growing stock over time - Management Unit of TFL 47

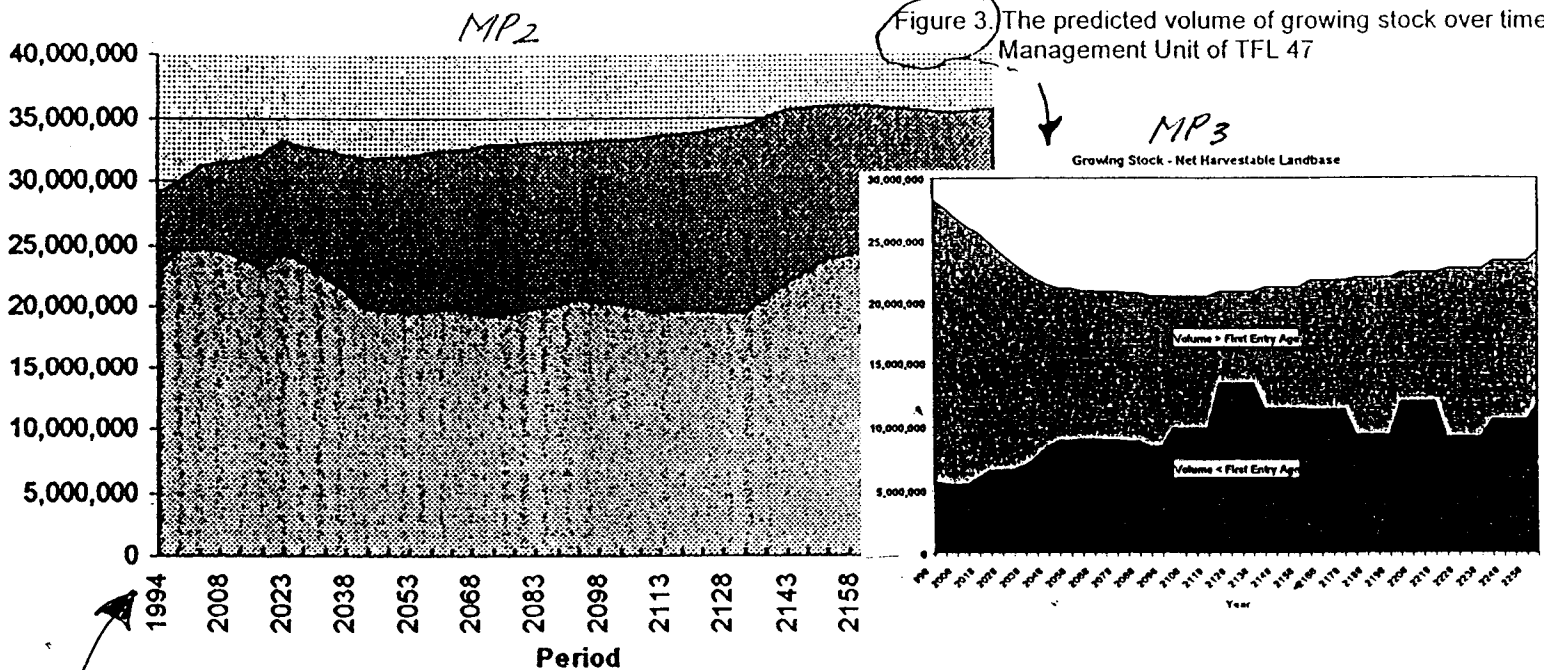


Figure 6-3. Growing stock for Base Case Harvest Simulation for the Johnstone Straits Management Unit.

In summary, the 24% increase in MP2 was bad enough. More gradually introduced increases can lead to a much greater LRHL than the large, hasty increases would. MP3's proposed level of 559,350 m / yr. is not even sustainable after MP3 and the longer that future reductions were delayed, the larger they would have to be. An LRHL of 559,350 is not even a worthy goal. Heavy cutting of the remaining old growth is not an option in this Unit. Any increase to harvest level in MP3 is unsupportable even by the narrow criteria of Management Plan review.

Sincerely,

Bruce Davies

cc: L. Pedersen

11 April 2001

Marilyn and Ron Ewart
General Delivery
Port Neville, B.C.
V0P 1M0

Dear Mr. and Mrs. Ewart:

Thank you for your letter regarding the *TFL 47 Draft Management Plan #3*.

I am responding on behalf of Gilbert Brennenstuhl. The issues that you raise are essentially *Operational* in nature. That is, the personnel in the *Johnstone Strait Operation* have some experience and knowledge of the area and the specific issues that you have raised, and we should be better equipped to address your concerns.

As you may know, I have spoken at length with Peggy Sowden and have sent her a letter in response to her letter and our conversation. I believe that Ms. Sowden and I were able to reach some mutually agreeable compromises regarding the two issues that she and you have raised: *siltation due to logging with hoe-chuckers and pesticide use*.

Specifically, I made three commitments to Ms. Sowden:

1. When the development of the logging near her property (block 4-20B) at Port Neville is at the *silviculture prescription* stage (this would occur approximately six months to two years before the commencement of logging) *TFL Forest Ltd.* will invite Ms. Sowden to review the plan. At that time, any objections to the proposed harvest method in the adjacent area may be raised and will be dealt with accordingly;
2. The area around the private properties at Port Neville is now a no-herbicide zone on the *TFL Forest Ltd. Pest Management Plan* (the no-herbicide zone includes all the area that sheds onto the private properties – based on the in-house topographic maps – and the small watershed to the north of the private land); and
3. I invited Ms. Sowden to visit me at the Middlepoint office sometime soon so I could show her some blocks that have already been logged and the process involved in their development.

I provided Ms. Sowden with some additional information: an outline of the process involved in developing a *silviculture prescription*, and a portion of the *Pest Management Plan* map showing the new no-herbicide zone.

Although the period for public review of the *Draft Management and Working Plan* may already have passed, there are other times when public input is solicited; that is, during the development of the *Forest Development Plan*. This plan is done once every two years and is more focused on details than the *Management and Working Plan*. Requests for public input on the plan are put into the local papers.

Regardless of when public input is legally required, communication is appropriate at any time.

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10 April 2001
Marilyn and Ron Ewart

If you like, please drop by the Middlepoint office and we can discuss these issues and I can review the planning process with you.

I hope I have addressed your concerns. If you have any more questions or would like to take me up on the offer of a visit give me a call (250-286-7328).

Yours truly,
TFL Forest Ltd.

Colin Buss, RPF
Assistant Forester
Johnstone Strait Operation

cc Gilbert Brennenstuhl, Manager, Forest Tenures, TimberWest
 Conrad Berube, Deputy Administrator of the Pesticide Control Act, MoELP

/cb

Marilyn + Ron Ewart
1203, Lot 2, General Delivery
Port Neville, B.C.
JOP 1M0

c.c. Bruce Goring
Steve Loring
Mar 23, 01

March 25, 2001

Mr Gilbert Brunnenstuhl, R.P.F.
Timberlust Forest Corp
Box 11101
Vancouver, B.C.
V6E 3P3

Dear Mr Brunnenstuhl,

Re: TFL 47, Draft MP No. 3

We are in receipt of your letter with regards to plans for TFL 47. As there has not been an opportunity for us to get into Campbell River to review the plans our information of the situation comes from discussions within the community. Mainly with Peggy Souden, our immediate neighbour. Having read his letter to you we would like to state that his comments pretty much sum up our feelings of the situation.

Just to emphasize a few points: siltation of water
pesticide use.

The use of backhoes for log removal does not work in this area. Having been in a logging situation we know that for fact. The machines seal the soil which in turn severely affects the water with siltation.

Pesticide use is something we don't want to see in the area. We are all on wells which are groundwater fed. The land in the area is all gently sloping with homes in low areas. The water comes from up behind the properties - area of the TFL. Also as Mr Souden stated there are both seasonal and year round creeks in the area all flowing into Port Neville.

We realize our comments are late but felt we had to respond anyway. Thank you for taking the time to read this letter

sincerely
Ron + Marilyn Ewart

29 March 2001

Peggy Sowden
General Delivery
Port Neville, B.C.
V0P 1M0

Dear Ms. Sowden:

Thank you for your letter regarding the *TFL 47 Draft Management Plan #3* and the proposed harvest blocks near your property at Port Neville.

As discussed on the telephone today, I have spoken with Gilbert Brennenstuhl at our head office in Vancouver. He suggested that the members of the planning team in the *Johnstone Strait Operation* (myself for example) would be better qualified to address your concerns. This letter is a summary of our discussion today; I hope I am able to address all your concerns.

Stream Siltation

As we discussed, TimberWest's current knowledge of the streams in the vicinity of the block to the north of your property is quite limited. Rest assured all logging and road building activities would be planned and conducted such that detrimental impacts to streams and fish habitat – such as siltation – would be minimized.

Silviculture Prescriptions

You asked if I could provide you with some information on the various assessments done prior to logging. The following is a summary of that process. You can get some more information on-line at:

www.gov.bc.ca/for/

This is the Ministry of Forests web site and it has links to all the forest legislation including the *Forest Practices Code* and all the literature that guide the development of logging blocks (as summarized below). I have attached a couple of pages from the *Operational Planning Regulation* of the *Code* that summarizes the assessments that must be done and how they must be incorporated into silviculture prescriptions.

Steps in the Development of a Block

Key steps in the development of a block are as follows:

- Rough sketch onto a 20 year plan (updated every five years) up to 20 years before actual harvest (based on timber type).
- More accurate sketch onto Forest Development Plan 1 to 5 years before actual harvest (based on timber type).
- Resource inventory updates – these are inventories that are static and in place well before any field work begins. Updates are periodic or as new information becomes available. Primary examples are:
 - Visual landscape and recreation – visual quality objectives from scenic corridors like the Johnstone Strait

... /2

29 March 2001
Peggy Sowden

- Terrain stability mapping of unstable ground
- Archaeological overview assessment
- Licenced and unlicensed domestic water intakes
- Riparian (streams, lakes and wetlands) classification (fish presence)
- Cave and karst – mapping of limestone geology (fairly rare in the Operation)
- Various assessments are done during block development. Some are initiated in response to information in the resource inventories (above); others are done independent of inventories. The assessments that may be done include:
 - Terrain report (if suggested by terrain stability mapping or indicators of instability that are discovered during layout) – performed by a geo-scientist.
 - Stream prescriptions (fish presence information – collected previously by a biologist – is integrated with information about stream morphology collected by the engineer and combined into stream prescriptions – no-harvest, hand cleaning, etc.)
 - Visual impact assessment (often involves computer modelling of the view as seen from pre-approved view points along the travel corridor; proposed development must meet the required visual standards) – performed by engineer and mapping departments.
 - Archaeological assessments (from full-scale impact assessments performed by an archaeologist to inspections of old cedar trees performed by the field engineer).
 - Windthrow hazard assessment (where are the trees likely to blow down, what is the consequence if they do, and what is the strategy to minimize the impact) – performed by layout engineer.
 - Forest health assessment (if there is a severe health problem such as root rot, a specialist will be brought in to survey the problem and prescribe treatments).
 - Identification of species at risk, some species of raptors, and appropriate management, such as nest tree protection.
 - Soil disturbance hazard assessment (where are the soils that are sensitive to ground-based harvesting equipment and what are the strategies to minimize impacts) – performed by prescribing forester.
 - Silviculture treatment regime (how will the forest be regenerated) – performed by prescribing forester.

The results of all assessments are integrated into the design of the block – the silviculture prescription must be consistent with the results and recommendations of all the assessments. A professional forester signs the prescription, and is accountable for the prescriptions content and the veracity of the assessments (If an assessment is wrong, both the assessor and forester may be held accountable).

If the silviculture prescription is technically sound, it is likely to achieve the specified objectives, and has all the content that is required by law, the forester who reviews it at the Ministry of Forests must recommend it for approval by the District Manager. Once that is done, TimberWest can apply for a “cutting permit” that authorizes the logging.

Herbicide Use

We will establish a no-herbicide zone (Operating Zone 4) on the land adjacent to your property. Until we have more accurate mapping of the streams in the area, the no-herbicide area will consist of the hill slope to the west of your property and the small creek watershed to the north. I have attached a copy of the map of the area.

... /3

29 March 2001
Peggy Sowden

Red Alder Management

As we discussed, managing for red alder on the land adjacent to your property, in order to avoid herbicide use in that area is problematic for three reasons.

One, it is difficult to predict the occurrence of red alder from natural sources (the preferred method of regeneration).

Two, planting red alder will often require the use of brushing (using herbicides) before planting to establish the trees. Unlike naturally occurring red alder, we can't always plant the day after logging and it only takes a few weeks in the summer for the brush to choke out the planted trees. Although manual brushing is an option, it is much more expensive and would require repeated treatments until the seedlings were up and out.

Three, current government policy only allows management for red alder on a limited basis and not through natural regeneration but through planting. We are working on changing this but even if the policy changes it may only apply to a fraction of the areas logged, and then only to the areas where natural regeneration has occurred.

If red alder management becomes a possibility we would make a decision to manage for it during the development of the silviculture prescription.

I suggest you drop by the office one-day and I will show you some examples of blocks that we have logged and the processes involved in their development. Give me a call before hand or if you have any other concerns (250-286-7328).

Yours truly,
TFL Forest Ltd.

Colin Buss, RPF
Assistant Forester
Johnstone Strait Operation

cc Gilbert Brennenstuhl, Manager, Forest Tenures, TimberWest
file: Forest Development Plan 2001-2005, Johnstone Strait Operation
file Pest Management Plan (2001), Johnstone Strait Operation

/cb

C.C. Bruce Storry
Steve Lorrimer

March 1, 2001

Gilbert Brennenstuhl,
R.P.F.,
TimberWest Forest Corp.,
Box 11101
Vancouver, B.C., V6E 3PE

Dear Mr. Brennenstuhl,

RE: TFL 47 Draft MP No.3
Port Neville, B.C.

Blocks : 4-20, 4-21, 4-20B, 4-21A, 4-16, 4-16B, 4-16C, 4-23, 4-22A, 4-22

I am a resident of Port Neville, lot#205 adjacent to 4-20B. After visiting the Middlepoint Office of TimberWest and discussing the proposed logging plans with Peter Share and Colin Buss I would like to make the following comments.

1. Stream Siltation

There are two streams which have their sources adjacent to and within the proposed cut blocks. These streams are known to have spawning salmon - both as witnessed by residents and by surveys conducted for the Ministry of Forests. They are marked as such by posted signs and are identified in red on the Development Plan Map (TimberWest)

The land adjacent to these streams is low elevation with many ridges formed between cuts created by streams and wetlands as well as sloped drier areas. The soil is shallow, less than 30 cm. in most locations and overlies clay subsoil.

Our land has the same physical features of soil and topography as the proposed logging site. In 1996 Coast Mountain Hardwoods removed alder and some conifers from approximately 35 acres of our property. They used hoechuckers in the log removal. We witnessed profound siltation of the small seasonal creek and the intertidal zone. At the time we were reassured siltation would not occur because of the method of timber extraction (hoechuckers) and the time of year (Sept., Oct.) The hoechuckers left a great deal of disturbance, ripping through the shallow soil and exposing the clay subsoil.

From my experience I would speculate that with the size of the area proposed to be logged and the logging roads marked siltation of the streams will occur.

2. Problems associated with pest management

1) Glycophosphate I understand that the surfactant ingredient used with glycophosphate is toxic to fish (related to gill coating) Since this area is connected by runoff to fish bearing streams the application of glycophosphate may pose a risk to those fish.

2) Triclopyr is adsorbed onto soil particles and has the potential to be mobile (Pesticide Information profile) I wonder what effect this could have on the exposed freshwater and saltwater plants?

3) In informal discussions with other residents of Port Neville it is felt that the lands adjacent to private property should be excluded from herbicide application. All the mammalian studies the Pesticide Information Profile mentioned were short term (compared to the human life span). As a veterinarian I am aware of how little is known in regards to long term side effects of herbicides. I do not feel the risk to humans living next to the application sites is justifiable.

In the case of these lands, if and when they are logged, I feel they would be better off left to undergo natural succession. Alders after all are a viable timber crop. If control of salmonberry, thimbleberry is deemed necessary alternate methods, such as mechanical brushing could be considered. The alder on our land are after five years several feet above the shrubs.

Thank you for considering my concerns.

Sincerely,

Peggy Sowden
PEGGY SOWDEN

cc. Gordon Wilson, Minister of Forests
Rory Annett, District Manager Ministry of Forests, Campbell River
Colin Buss, TimberWest
Peter Share, TimberWest
Frank Voysey, D.F.O.
Hon. H. Dahliwal, Fisheries Minister, DFO

PEGGY SOWDEN, G.I.D., PORT NEVILLE BC
VOPIMO



District of Campbell River

File: 0510-20/TWFL

From the Office of the Mayor

April 2, 2001

TimberWest Forest Corp.
Box 11101
Vancouver, BC V6E 3P3

C.C. Steve Corvum
Bruce Storry

Attention: Mr. Gilbert Brennenstuhl, R.P.F

Dear Sir:

Re: TFL 47 Draft Management Plan

At the Committee of the Whole meeting held on March 20, 2001 the District of Campbell River Council passed a unanimous resolution supporting the work of TimberWest in it's application of TFL 47 Draft Management Plan for approval by the Ministry of Forests.

Yours truly,

Councillor Wm. Harrison
Acting MAYOR



District of Campbell River

File: 0510-20/TWFL

February 15, 2001

TimberWest Forest Corp
Box 11101
Vancouver, BC V6E 3P3

Attention: Mr. Gilbert Brennenstuhl, R.P.F.

Dear Sir:

Re: Public Review Process for TFL 47, Draft Management Plan No. 3

Thank you for your correspondence dated January 31, 2000 addressing the above noted subjects. Your letter was presented to Council at its February 13, 2001, Meeting.

Council wishes to extend an invitation to TimberWest representatives to attend a meeting to have the Draft Management Plan explained.

Please call me at (250) 286-5707 at your convenience to schedule a suitable date and time.

Yours truly,

Kaylene Simmons
Deputy Clerk

KS/sj

Steve Lorimer and Bruce Storry
gave a presentation to
council April 20 (I believe)

TFL Forest Ltd.
Johnstone Straits Operation
5705 North Island Highway
Campbell River, B.C.
V9W 5C5
PHONE: (250) 287-9181
FAX: (250) 286-7315

Facsimile transmittal

To: Kirk Mortensen Fax: (206) 621-7323
From: Bruce Storry Date: February 14, 2001
Re: TFL 47, Management Plan #3 Pages: 2, including this cover sheet.
CC: G. Brennenstuhl, Timberwest Forest Co.

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Dear Mr. Morensen

Thank you for your inquiry to Management Plan #3, Tree Farm Licence #47.

A portion of the TFL covers the west two thirds of West Thurlow Island and the southern portion of East Thurlow. The 20 year projection shows harvesting in the 2006-2010 and 2016-2020 periods.

If I understand the location of your property interest, located ½ mile from Blind Channel Resort on West Thurlow Island Timberwest does not hold tenure adjacent to that property. International Forest Products holds the adjacent tenure.

Block 9, East Thurlow has planned areas in 2016-2020. Harvesting of areas along the waterways is part of a visual landscape inventory, digital terrain modeling is required prior to harvest approval. Thus you have assurance that harvesting proposed by Timberwest will include visual design.

Attached is a map designating TFL 47, sorry for the "fax quality".

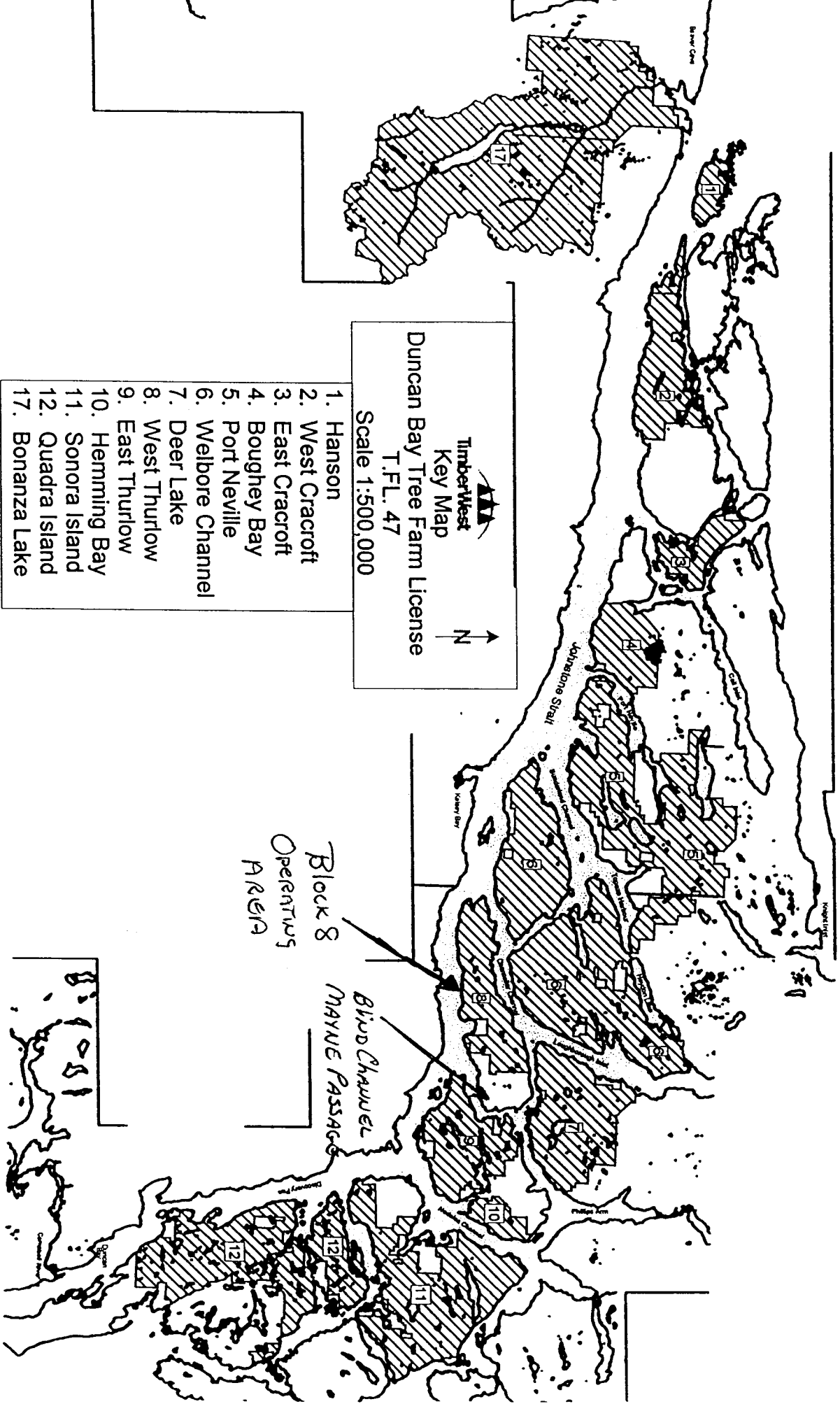
Yours truly,
TFL Forest Ltd.



Bruce Storry, RPF
Johnstone Strait Operation
Operation Planner

BTS/tc

.....



TimberWest
Key Map
Duncan Bay Tree Farm License
T.F.L. 47
Scale 1:500,000

1. Hanson
2. West Cracroft
3. East Cracroft
4. Boughey Bay
5. Port Neville
6. Welbore Channel
7. Deer Lake
8. West Thurlow
9. East Thurlow
10. Hemming Bay
11. Sonora Island
12. Quadra Island
13. Bonanza Lake

Block 8
Operating
Area

Blind Channel
Mayne Passage



TimberWest Forest Limited

Suite 2300, 1055 West Georgia St.
P.O. Box 11101
Vancouver, British Columbia
Canada V6E 3P3

Phone 604.654.4600

January 31, 2001

Regional Manager
Vancouver Forest Region
2100 Labieux Road
Nanaimo, B. C.
V9T 6E9

Attention: Greg Gage, R.P.F.

Dear Greg,

Re: Public Review of TFL 47, Draft MP No. 3 from October 3 to December 2, 2000

Attached please find a summary of comments received during the public review process in the fall of 2000 and our responses. To date, we have only received comments from Judy Johnson (Sierra Club) and Ian MacDougall (MELP).

We trust that you find the attached in order.

Yours truly,

Gilbert Brennenstuhl
Manager, Forest Tenures

c.c. Bud Koch, Timber Supply Branch, Victoria
John Andres, Campbell River Forest District
Bill McMullan, Port McNeill Forest District



TimberWest Forest Limited

Suite 2300, 1055 West Georgia St.
P.O. Box 11101
Vancouver, British Columbia
Canada V6E 3P3

Phone 604.654.4600

January 31, 2001

Ian MacDougall, R.P. Bio
Ministry of Environment, Lands and Parks
8785 Gray Street
Bag 11000
Port Hardy, B. C.
V0N 2P0

Dear Ian,

Thank you for your input on draft Management Plan No. 3 for TFL 47. Your letter was dated November 9, 2000 and received in this office Dec 20, 2000.

Attached please find a summary of your comments and our responses. A copy of this information will be sent to the Ministry of Forests.

If you have any additional queries, please contact the undersigned.

Yours truly,

Gilbert Brennenstuhl
Manager, Forest Tenures



TimberWest Forest Limited

Suite 2300, 1055 West Georgia St.
P.O. Box 11101
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January 31, 2001

Judy Johnson
The Sierra Club of BC – Quadra Group
Box 219
Heriot Bay, B. C.
V0P 1H0

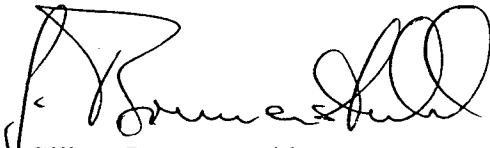
Dear Judy Johnson,

Thank you for your input on draft Management Plan No. 3 for TFL 47 dated November 30, 2000.

Attached please find a summary of your comments and our responses. A copy of this information will be sent to the Ministry of Forests.

Again, thank you for your participation in the review process and taking the time to comment.

Yours truly,



Gilbert Brennenstuhl
Manager, Forest Tenures

Summary of Comments Received on TFL 47, Draft Management Plan No. 3 with TimberWest's Response

Comment	Document	Person	Response
Quadra SMZ - Current harvest practices have demonstrated considerable innovations towards addressing non-timber resource values. The effects of current stand level impacts on long term timber supply could be analysed for this unit and put into perspective with the intended SMZ impacts of 10%.	TSA Report (4.1.7)	Ian McDougall – Nov 9/00	The effects of current stand level practices on long term yields (from shading for example) are not fully understood. It is our understanding that some research and trials have been initiated but results will not be available for some time.
Implications of VR – report states “with aggregate retention, the requirement to retain 10% of the gross harvest area will be met from the existing netdowns required by the FPC”. It is not clear how within-stand retention of WTP, if any, is factored into this assumption, particularly with regard to application of tables 21(a) and (b) from the Biodiversity Guidebook.	TSA Report (4.1.8)	Ian McDougall – Nov 9/00	These retention areas will include within-stand retention of wildlife tree patches required under the FPC. Modeling of FPC impacts is done through netdowns and harvest constraints. WTP's have an additional 1% area netdown as shown in section 6.17.5 in the Information Package.
Seral Stage Targets. The “blended” seral stage target for old-growth is stated to be 14% in the analysis report. The derivation of this percentage should be explained. Based on the 45:45:10 policy for lower, intermediate, and higher Biodiversity Emphasis Options (BEOs) does 14% reflect 13.6% rounded up?	TSA Report (4.2.1.4)	Ian McDougall – Nov 9/00	Yes.°
As a second point, a sensitivity analysis could easily be run to show the			We assume that the 4% drawdown mentioned is the option in low BEO landscape units to phase in the

Comment	Document	Person	Response
<p>estimated impact of a 4% drawdown, as recommended in the VILUP, Higher Level Plan (HLP), when applied to the initial target old seral (13%).</p>			<p>OG over two rotations. (1/3rd now, 2/3rd after 70 years and 100% after 140 years).</p> <p>We don't believe the assumption in the timber supply modeling was significantly different than the phase-in policy. Within the timber supply model it was assumed that <i>"In the event that the old seral stage target exceeds the area of old-growth within a landscape unit-variant/sub-zone, then the model is constrained to prevent harvesting in the remaining old growth and the old-seral constraint is applied to the mature (typically timber age 80+ years) component of the forest to ensure the old seral stage target is met as soon as possible."</i></p> <p>On the coast, landscape units tend to have timber age 250+ and timber less than 80 years of age. There is very little timber between ages 80 and 250. In order to have OG timber in 140 years, all the timber currently older than 100 years needs to be excluded from harvest. While the "drawdown" strategy may provide a bit of operational flexibility when OGMA's are created, it provides very little relief from a rate-of-harvest perspective.</p>
<p>TEM – Application of VILUP's HLP in the Bonanza Landscape Unit to address limited drawdown of the old growth target and subsequent recruitment strategies can be most effectively delivered by using the newly acquired (1999) TEM</p>	<p>MP #3</p>	<p>Ian McDougall – Nov 9/00</p>	<p>The 1999 TEM information was used in the Timber Supply Analysis for both the Bonanza Lake and Johnstone Strait management units.</p>

Comment	Document	Person	Response
information.			
<u>Ungulate Winter Range.</u> In April 1999 we jointly developed and agreed to boundary refinements and/or relocations of ungulate winter ranges in the Bonanza draft landscape Unit. This included both elk and deer winter ranges. It is the opinion of MoELP that the new agreements should be displayed in MP #3 concurrent with the recently grandparented (October 1998) MP #2 winter ranges. Presentation of both map sets should help to facilitate confirmation of the newly refined ungulate winter ranges as per Section 69 of the FPC Operational Planning Regulations.	MP #3	Ian McDougall – Nov 9/00	We do not support displaying two sets of data because it will lead to confusion. We believe it is appropriate to show the currently approved grandparented winter ranges only.
<u>AAC Increase.</u> MP2 received a 24% increase in the AAC for the Johnstone Strait management unit. This new plan is proposing a further 24% AAC increase -- from 425,000 m3/year to 528,000. We are opposed to this increase and question how this can be proposed despite the following: 1. The impact on yield by the new policy of Variable Retention 2. The reduction of 5% in the AAC due to ownership transfer in 1997. 3. The VILUP will take effect on December 1, 2000. Therefore the		Judy Johnson- Nov. 30/00	Between the MP2 and MP 3 Timber Supply Analysis, the long-term timber harvesting land base decrease by approx. 8,400 ha. This decrease represents the explicit area deductions for riparian management areas, marine buffers, and parks. This decrease in the THLB is partially off-set by the decision to model the requirements for biodiversity (seral stage) as a constraint on harvesting rather than as an area deduction (i.e. reductions for FENs). During MP 2, the MoF undertook an audit of our forest inventory. As a result of the Ministry's findings, our yield for second growth stands has

Comment	Document	Person	Response
<p>impact over the term of this MP3 of this higher level plan should be taken into consideration.</p> <p>4. The THLB has been reduced 2,685 ha. from the previous plan due to the new parks on Quadra island.</p>			<p>been increased on average by 9.5%.</p> <p>Further, in MP 2, because of uncertainty associated with the implementation of the Forest Practices Code, TimberWest voluntarily reduced harvest levels in Johnstone Strait by 125,000 m³/year.</p>
<p>THLB Deductions: We question why other area deductions to the THLB are not higher:</p> <ol style="list-style-type: none"> 1. The biodiversity deductions in MP 2 were higher than MP 3 and at the same time Wildlife Tree Patches and Riparian zones were not fully accounted for. 2. Non-forest, inoperable, problem forest types, low sites, ESAs all had higher deductions in MP 2 		<p>Judy Johnson- Nov. 30/00</p>	<p>Following direction provided by the Ministry of Forests, the approach to managing for biodiversity has changed between MP 2 and MP 3. In MP 2, a draft Forest Ecosystem Network (FEN) plan was proposed as a timber supply sensitivity analysis. The draft FENs resulted in approximately 8,295 ha to be removed from the Timber Harvesting Landbase. The biodiversity (FEN) plans proposed by TimberWest were never approved by the Ministry of Forests (MoF).</p> <p>Since MP 2, the Government has implemented the Vancouver Island Land Use Planning (VILUP) and Central Coast Land and Coastal Resource Management Planning (CCLCRMP) processes. These processes will designate landscape level Biodiversity Emphasis Options (BEOs) and identify Old-Growth Management Areas (OGMAs). Since the VILUP and CCLCRMP process are on-going, OGMAs have not been identified on the ground. Therefore it is not possible to deduct areas from the timber harvesting landbase to account for the intended OGMA areas. Instead, the timber supply model was constrained to ensure that a percentage</p>

Comment	Document	Person	Response
			of each landscape unit (by sub-zone variant) was maintained as old-growth. While this constraint prevents the model from harvesting some of the old-growth, the area protected from harvesting does not show up as an explicit reduction in the timber harvesting landbase.
Landscape Unit Planning: It is felt that the MP 3 deductions do not allow enough room for biodiversity requirements in Landscape Unit Planning. Because Quadra is a high priority for planning it is expected that it plans will be worked in the near future.		Judy Johnson- Nov. 30/00	Seral stage requirements under landscape unit planning, were not modeled as a netdown in the timber supply analysis; rather they were modeled as a harvest constraint which maintained the specified percentage of mature and old timber by biogeoclimatic subzone/variant. The biogeoclimatic subzone/variants were determined using the recently completed Terrestrial Ecosystem mapping (TEM) inventory.
Biodiversity Planning: The 1996 <i>Rationale for Allowable Annual Cut Determination</i> noted that: "Any outcomes of landscape biodiversity planning will be reflected in the next analysis and the determination conducted for this TFL." (bottom pg 35 of rationale) " ... given the potential medium and long-term timber supply implications of biodiversity management, it is important to prepare and implement a landscape level biodiversity plan, including		Judy Johnson- Nov. 30/00	Since MP 2, the Government has implemented the Vancouver Island Land Use Planning (VILUP) and Central Coast Land and Coastal Resource Management Planning (CCLCRMP) processes. These processes will designate landscape level Biodiversity Emphasis Options (BEOs) and identify Old-Growth Management Areas (OGMAs). Both the VILUP and CCLCRMP process are ongoing. The RM advised us that the Landscape Unit Plans would meet the MP No. 2 requirement for biodiversity plans. As noted above, the anticipated results of the VILUP and CCLCRMP process were incorporated into the timber supply analysis.

Comment	Document	Person	Response
<i>objectives for different types and ages of forest, for consideration in the next determination." (top pg 36 of rationale)</i>			
Goshawk Nests: Three QC Goshawk nests have been found in TFL 47 – one on Quadra Island. We are concerned that a much higher AAC will reduce our options to protect wildlife species such as this as they are identified in Landscape Planning.		Judy Johnson- Nov. 30/00	Goshawk nests will be identified and given a 200 m buffer from harvesting in accordance with TimberWest policy and IWMS interim measures. These are stand-level issues and can be accomplished without impacting AAC. Also, these nests are not candidates for large WHA's (2400 ha) as listed in the IWMS, since they occur in second growth forests and in fact may not be Queen Charlotte goshawks (subspecies <i>laingi</i>) since they do not nest on Vancouver Island.
Karst: Since the last MP a karst study was completed on Quadra (1998). We question that sufficient deductions have been allowed for this resource.		Judy Johnson- Nov. 30/00	In the Johnstone Strait management unit Karst is only present on Quadra Island and covers about 500 ha. Areas of relatively high feature significance were identified in a 1997 inventory and have been netted out of the THLB. Other small areas will undoubtedly be found as development proceeds. These small areas will be dealt with on a case by case basis. They will likely be incorporated into WTP's.
Marine Buffers: The reductions for the marine buffer is modeled after a 30 metre wide buffer however the previous plan allowed for a 50 meter buffer. Why has this changed?	TSA/IP	Judy Johnson- Nov. 30/00	In MP 2, marine buffers were not formally incorporated in the timber supply model. However, we did recognize that a marine buffer with restricted harvesting activity was becoming increasingly important. Therefore, in the MP 2 Timber Supply Analysis we assumed that our inability to harvest within 50 meters of the foreshore would result in an AAC reduction of 20,000 M ³ /year.

Comment	Document	Person	Response
			<p>During MP 2, we have gained greater experience in getting cutting permits near foreshore areas. A 30 metre foreshore marine buffer where only 10% of the volume will be harvested more accurately reflects our operational experience. The 30 metre buffer with a 90% netdown was used in the MP 3 timber supply analysis.</p>
<p>Old Growth: We are concerned with harvesting plans that will focus on among other things "economically accessible stand of old growth timber". During the 1st five year period, the model proposes to harvest 3,600 ha. – half of the remaining 7,800 ha of old-growth. We are opposed to this scheme, especially as OGM areas have yet to be designated.</p> <p>Reference to 1996 Rationale indicating the need to biodiversity planning: "I believe, a landscape-level plan is imperative and have directed the licensee to undertake biodiversity planning during the term of MP No.2. My concern is partly lessened by analysis results that indicate short-term timber supply does not rely on the harvest of old growth, therefore providing time for planning."</p> <p>Biodiversity Planning is still not</p>	TSA	Judy Johnson- Nov. 30/00	<p>The timber supply model harvests 3,600 ha. of a total of 11,400 ha, or 32%, of the old-growth during the first five year period. Two-thirds (7,800 ha.) of the existing old-growth remains unharvested throughout the timber supply simulation. (figure 13 – TSA). The model is prevented from harvesting old-growth by the constraint that ensures landscape level biodiversity targets are met within each sub-zone variant.</p> <p>As indicated above, landscape unit planning is ongoing and meets the MP No. 2 requirement for biodiversity planning.</p> <p>The concerns mentioned have been explained</p>

Comment	Document	Person	Response
completed and yet a higher AAC is proposed; fewer deductions are given for biodiversity etc. in the THLB; and harvesting of half of the remaining old-growth is planned.			under the headings "Biodiversity Planning", "THLB Deductions", and "Old Growth".
<u>Old Growth:</u> All remaining old growth on Quadra is of concern not just that located on Mount Seymour. As well, concern has been raised numerous times regarding the old growth on Sonora island north of Hole-in-the-Wall. The MP3 is still showing cutblocks in this location.	20 Year Plan?	Judy Johnson- Nov. 30/00	Since MP 2, the Government has implemented the Vancouver Island Land Use Planning (VILUP) and Central Coast Land and Coastal Resource Management Planning (CCLCRMP) processes. These processes will designate landscape level Biodiversity Emphasis Options (BEOs) and identify Old-Growth Management Areas (OGMAs). Since the VILUP and CCLRMP process are on-going, OGMAs have not been identified on the ground. Therefore it is not possible to deduct areas from the timber harvesting landbase to account for the intended OGMA areas. Instead, the timber supply model was constrained to ensure that a percentage of each landscape unit (by sub-zone variant) was maintained as old-growth. While this constraint prevents the model from harvesting some of the old-growth, the area protected from harvesting does not show up as an explicit reduction in the timber harvesting landbase.
<u>Quadra Island Cut Level:</u> The proposed cut level is too high to accommodate all these other constraints. The cut rate on Quadra's SMZ has risen from 207,300 m ³ in the 1998 to 2002 Development Plan; to 240,900 in the 1999 to 2003 plan; and now approximately 273,623 in	20 Year Plan or FDP	Judy Johnson- Nov. 30/00	Comments regarding the Forest Development Plan should be directed to our Middlepoint office in Campbell River. The draft MP 3 - 20 Year Plan shows an average harvest on Quadra Island of approximately 45,000 m ³ /year. This harvest rate is less than the growing capacity of the TFL 47 portion of the Quadra Island timber harvesting land base.

Comment	Document	Person	Response
the latest development plan.			The harvest will be higher or lower than the average in any one year or any one 5 year period.
<u>Quadra Island Cut Level:</u> TimberWest's proposals to compensate for the impact of the SMZ designation with a 10% deduction in yield or 5,500 m3/year is inadequate especially when the increase in AAC in this area over the duration of the VILUP process is considered.	TSA	Judy Johnson- Nov. 30/00	<p>The 10% reduction in yield is consistent with the statements made by government with respect to the anticipated impact of SMZ designation.</p> <p>All operations within the Quadra SMZ will adhere to requirements of the Forest Practices Code. During the term of MP 3 we will gain more experience operating under the SMZ regulations and guidelines. The assumptions used in the MP 4 timber supply analysis will be modified accordingly.</p>

C.C. Jim McP.
Steve L.
Bruce S.
Dave S.
Dave L.

November 9, 2000

File: 36325-28/47
Management Plan #3

Timberwest
Suite 2300, 1055 W. Georgia
Vancouver, BC
V7Y 1J7

Dear Gilbert Brennenstuhl:

Re: TFL 47, MP #3 Timber Supply Analysis and Draft MP #3

In recent review of your Timber Supply Analysis Report, Appendix III (June 8, 2000), I have noted a few items which you might choose to further address. In addition, I would also like to provide a few ideas regarding development of your final Management Plan (MP) #3. Comments on your 20 year plan may be provided later under separate cover.

1.0 Timber Supply Analysis Report

1.1 Quadra Island – Special Management Zone (Section 4.1.7)

Current harvest practices have demonstrated considerable innovation towards addressing non-timber resource values. The effects of current stand level impacts on long term timber supply could be analysed for this unit and put into perspective with the intended Special Management Zone impact of 10%.

1.2 Timber Supply Implications of Variable Retention (Section 4.1.8)

The report states that "with aggregate retention, the requirement to retain 10% of the gross harvest area will be met from the existing netdowns required by the Forest Practices Code". It is not clear how within-stand retention of Wildlife Tree Patches (WTP), if any, is factored into this assumption, particularly with regard to application of tables 21(a) and (b) from the Biodiversity Guidebook.

1.3 Seral Stage Targets (Section 4.2.1.4)

The "blended" seral stage target for old growth is stated to be 14% in the analysis report. The derivation of this percent should be explained. Based on the 45:45:10 policy for lower, intermediate and higher Biodiversity Emphasis Options (BEOs) does 14% reflect 13.6% rounded up?

.../2

As a second point, a sensitivity analysis could easily be run to show the anticipated impact of a 4% drawdown, as recommended in the Vancouver Island Land Use Plan (VILUP), High Level Plan (HLP), when applied to the initial target old seral (13%).

2.0 Management Plan #3

2.1 Terrestrial Ecosystem Mapping

Application of VILUP's HLP objectives in the Bonanza Landscape Unit to address limited drawdown of the old growth target and subsequent recruitment strategies can be most effectively delivered by using the newly acquired (1999) Terrestrial Ecosystem Mapping information.

2.2 Ungulate Winter Range

In April 1999 we jointly developed and agreed to boundary refinements and/or relocations of ungulate winter ranges in the Bonanza draft Landscape Unit. This included both elk and deer winter ranges. It is the opinion of the Ministry of Environment, Lands and Parks (MELP) opinion that the new agreements should be displayed in MP #3 concurrent with the recently grandparented (October 1998) MP #2 winter ranges. Presentation of both map sets should help to facilitate confirmation of the newly refined ungulate winter ranges as per Section 69 of the Forest Practices Code Operational Planning Regulations.

Sincerely,



Ian McDougall, R.P. Bio.
Senior Habitat Biologist, Forestry

cc: Bud Koch, Senior Analyst, Timber Supply Branch, Ministry of Forests, Victoria
Rob Stewart, Forest Ecosystem Specialist, MELP, Port Hardy

[Click here and type address]

To: G. Brennenstuhl, RPF

Fax: 604 654-4662

From: J. Johnson

Date: 30/11/00

Re: MP3 - TFL 47

Pages: 3 including cover

CC: [Click here and type name]

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle



c.c. Jim McPalen

Steve Lorimer

Bruce Storry

Dave Simpson

Dave Lindsay

Dec 21 2000



The Sierra Club of BC - Quadra Group

Box 219 Heriot Bay B.C. V0P 1H0
Fax (250) 285-2922

Phone (250) 285-3692

November 30, 2000

TimberWest Forest Corp.
Box 11101
Vancouver, B.C.
V6E 3P3

Attention: G. Brennenstuhl, RPF

RE: TREE FARM LICENSE NO. 47, MANAGEMENT PLAN NO. 3

By asking the time and resources to go into a detailed analysis of your Management Plan we will limit our comments to a number of our main concerns. Our emphasis is on the Johnstone Strait Management Unit and in particular Quadra Island.

MP2 received a 24% increase in the AAC for the Johnstone Strait Management Unit. This new plan is proposing a further 24% AAC increase – from 425,000m³/yr to 528,300. We are opposed to this increase and question how this can be proposed despite the following:

- The impact on yield by the new policy of Variable Retention.
- The reduction of 5% in AAC due to ownership transfer in 1997.
- The VILUP will take effect on December 1, 2000. Therefore, the impact over the term of this MP3 of this Higher Level plan should be taken into consideration.
- The Timber Harvesting Landbase has been reduced by 2,685 ha. from the previous plan due to the new parks on Quadra Island.
- We question why other area deductions to the THLB are not higher: i.e. The Biodiversity deductions in MP2 were higher than MP3 and at that time Wildlife Tree Patches and Riparian zones were not fully accounted for. Non-forest, Inoperable, Problem Forest Types, Low Sites, ESAs all had higher deductions in MP2. It is felt that the MP3 deductions do not allow enough room for biodiversity requirements in Landscape Unit Planning. Because Quadra is a high priority for planning, it is expected that its plan will be worked on in the near future.
- The 1996 *Rationale for allowable annual cut determination*, noted that "Any outcomes of landscape-level biodiversity planning will be reflected in the next analysis and determination conducted for this TFL." Given the potential medium-and long-term timber supply implications of biodiversity management, it is important to prepare and implement a landscape level biodiversity plan, including objectives for different types and ages of forest, for consideration in the next determination."

- Three Queen Charlotte Goshawk nests have been found in TFL47 - one on Quadra Island. We are concerned that a much higher AAC will reduce our options to protect wildlife species such as this as they are identified in Landscape Planning.
- Since the last MP a karst study was completed on Quadra (1998). We question that sufficient deductions have been allowed for this resource.
- The reductions for the Marine Buffer is modeled after a 30 meter wide buffer however the previous plan allowed for a 50 meter buffer. Why has this been changed?
- Old Growth: We are very concerned with harvesting plans that will focus on among other things "economically accessible stands of old growth timber". During the first five-year period, the model proposes to harvest 3,600 ha. - half of the remaining 7,800 ha of old growth. We are opposed to this scheme, especially as OGM areas have yet to be designated. The 1996 *Rationale for allowable annual cut determination* states "I believe, a landscape-level plan is imperative and have directed the licensee to undertake biodiversity planning during the term of MP No.2. My concern regarding biodiversity management is partly lessened by analysis results that indicate short-term timber supply does not rely on the harvest of old growth, therefore providing time for planning." This planning is still not completed and yet a higher AAC is proposed; fewer deductions are given for biodiversity etc. in the THLB; and harvesting of half of the remaining old growth is planned.
- All remaining old growth on Quadra is of concern not just that located on Mount Seymour. As well, concern has been raised numerous times regarding the old growth on Sonora Island north of Hole-in-the-Wall. The MP3 is still showing cutblocks in this location.

Looking at the proposed cutblocks for Quadra Island for the next 20 years and taking into consideration non-operative areas, recreation/tourism values, the biodiversity requirements (including OGMAs), the SMZ designation etc., we feel that the proposed cut is too high to accommodate all these other constraints. At a time when Landscape Unit Planning is imminent, the cut rate on Quadra's SMZ has risen from 207,300 m³/yr in the 1998 to 2002 Development Plan; to 240,900 in the 1999 to 2003 plan; and now to approximately 273,623 in the latest proposed Development plan. TimberWest's proposal to compensate for the impact of the SMZ designation with a 10% deduction in yield or 5,500 m³/yr, is inadequate especially when the increase in AAC in this area over the duration of the VILUP process is considered.

Yours truly,



Judy Johnson

CC: District Manager, C.R. Forest District

**Public Review
Of
Management Plan No. 2**

(July 22nd, 1998 – August 21st, 1998)

October 26, 1998

Regional Manager
Vancouver Forest Region
2100 Labieux Road
Nanaimo, B. C.
V9T 6E9

Attention: Doug Stewart

Dear Doug Stewart,

**Re: Public Involvement Summary Report
TFL 47, Management Plan No. 2**

The opportunity for public review of the current Management Plan No. 2 was advertised in local newspapers as follows:

Queen Charlotte Observer	July 2 and 9
North Island Gazette	July 8 and 15
Campbell River Courier-Islander	July 2 and 9
Comox Valley Record	July 8 and 15
Courtenay Echo	July 3 and 10
Nanaimo Daily Free Press	July 2 and 9
Ladysmith-Chemainus Chronicle	July 7 and 14
Victoria Times Colonist	July 2 and 9

The Management Plan (text and map folios) was available for review in TimberWest's offices at Crofton, Middlepoint, Beaver Cove and Sandspit as well as MoF offices in Victoria and Nanaimo and in the District offices in Port Alberni, Campbell River, Port McNeill and Sandspit.

Written comments were requested by August 28, 1998.

TimberWest registered one visitor at the Crofton office while the Ministry of Forests reported 4 visitors at the Campbell River District office. None of the other viewing locations had any visitors at all.

A total of six written submissions were received, two of them late. Copies including our responses are attached. A summary of comments and responses is also provided for your convenience.

Yours truly,

Gilbert M. Brennenstuhl, R.P.F.
Manager, Forest Tenures

—

Public Response Summary of Comments on TFL 47, MP #2

COMMENT	RESPONSE
there should be no harvesting of trees younger than 60 years	second growth is harvested at financial rotation and market demands as approved in MP #2
leave young trees in clearcuts	WCB regulations and mistletoe infestations often make it impractical to leave any trees standing in clearcuts, however, we now plan to leave clusters of non-commercial trees whenever possible
changed conditions, issues and information since 1994 make for an in-depth review of MP #2	the periodic submission of MP accommodates the need to revisit estimates and assumptions previously used
the base case overcuts young age classes resulting in reduced carbon storage capacity	the MP does not specifically address carbon balances
excessive harvesting of younger age classes will become self-perpetuating	the timber supply analysis will address the issue of harvesting of younger age classes over the long term
harvest rates for Quadra Island in current FDP are too high for its contribution to the THLB	higher rates of harvest in one period are offset by lower than average harvest rates in other periods
request for land base summaries for Quadra Island	this information is not part of MP #2. To the extent that it becomes available during the preparation of the next MP it will be part of the public review process
the current base case shows excessive harvesting of old growth in the first decade	the next timber supply analysis will try to model old growth harvest over a longer time span
an integrated watershed management plan should be prepared for Tsolum/Puntledge	there is no legal requirement for such a plan and we will continue to operate in full compliance with FPC and Fisheries Act

Riparian vegetation should be left to provide shade, nutrients and soil stability. S4 to S6 streams should have riparian reserves	TimberWest will continue to operate in full compliance with the requirements of the FPC
wildlife corridors should compensate for the clearcut associated with the VI highway	TimberWest cooperates with MELP wildlife biologist to meet MELP wildlife habitat objectives within the framework of FPC requirements
old growth areas should not be cut and additional areas recruited to meet VIRT seral stage targets	TimberWest is currently preparing the Terms of Reference for a landscape level biodiversity plan which will integrate-Landscape Unit Planning
viewsapes must consider recreational users, esp. in the Tsolum and Puntledge drainages and around Comox Lake	proposed harvesting adjacent to public use areas as shown on the approved 20 year plan will be designed to minimize visual impact
TimberWest should set up process to consult with residents for harvesting adjacent to residential areas	TW has a program of maintaining contact with concerned residents which is working well
FPC must continue to apply to all private land within TFL	FPC applies to all land within TFL, both public and private
no evidence that TimberWest is meeting its MP commitments with respect to environmental protection and sustaining existing ecosystems	TimberWest is confident that it is in compliance with its environmental policy and FPC

October 26, 1998

Jerry Baker
BC Trappers Association
P.O. Box 397
Crofton, B. C.
V0R 1R0

Dear Mr. Baker,

Thank you for taking the time to comment on Management Plan No. 2 for TFL 47. Your comments will be taken into consideration during the preparation of the next Management Plan.

We provide the following feedback in response to the issues you have raised:

- Second-growth stands are harvested at financial rotation and market requests as outlined and approved in MP # 2.
- We will manage for wildlife habitat that is critical for "listed" species only, e.g. Vancouver Island Marmot, but not regionally significant species (deer, etc).
- It is often difficult to retain individual residual trees within the stand when clearcutting; in most cases it is unsafe to do and usually violates WCB regulations. It could also result in maintaining undesirable trees (mistletoe infestation).
- We now plan to leave areas of non-commercial trees in aggregates (clumps) within blocks (or on rock bluffs as you suggest) wherever possible giving due consideration to the yarding system and safety concerns.
- in the future, please contact the Nanaimo Lakes office for access to Coon Mt.
- We sincerely appreciate your comments regarding improved communications and the objectives for such as outlined by the B.C. Trappers Association. We too believe this is to the benefit of both our industries.

Again, thank you for your comments.

Yours truly,

Gilbert M. Brennenstuhl
Manager, Forest Tenures



Comment Form

Public Review of current Management Plan No. 2
Tree Farm License No. 47

Do you have any issues or comments you wish to raise in respect of the current MP you have reviewed?

UPON REVIEW OF YOUR PLAN, I AM ALARMED AT YOUR PROPOSAL TO START HARVESTING TREES AT 45 YRS. IN MY YEARS OF TRAPPING I HAVE FOUND THAT THE MOST PRODUCTIVE FOREST FOR WILDLIFE SEEMS TO BE IN THE 40-80 YEAR RANGE. HARVESTING SHOULD NOT BEGIN UNTIL 60 YRS MINIMUM. ON HARVESTING PRACTICES, I DON'T UNDERSTAND WHY YOU HAVE TO HARVEST TREES THAT ARE GROWING ON ROCK BLUFFS, THESE TREES WOULD BE OF POOR QUALITY AND MOST LIKELY END UP AS PULP WOOD ANYHOW. IN YOUR PLAN I NOTICED SECTION 1.3 INCORPORATE WILDLIFE PIECES I WOULD LIKE TO SUGGEST THAT ON CLEARCUTS, WHY IS NOT POSSIBLE TO LEAVE YOUNG TREES (0-15) AND NATURAL VEGETATION ALONG WATER DRAINAGES AND WATER COURSES TO HELP ESTABLISH WILDLIFE CORRIDORS AND HELP PREVENT EROSION. I DON'T UNDERSTAND WHY EVERYTHING HAS TO BE REMOVED FROM A CLEARCUT. ALSO WHEN I ~~REMOVED~~ REVIEWED YOUR PLAN, NO ONE WAS AVAILABLE TO ANSWER MY QUESTIONS ON
(OVER →

Completed by (print legibly, please)

Name: J. BAKER

Address: Box 397

CROFTON, B.C.

V0R1R0

Please forward comments

by Aug 28, 98 to:

TimberWest Forest Limited

Box 11101

Vancouver, B. C.

V6E 3P3

Attention: G.M. Brennenstuhl, RPF

July 14/98

your place in the community. The last thing we
want is to be in the community, because I could not find anything
about a new setting on Cookman off of Branch St. This would
be BRS-A. If possible I would like to be able to access this
area after you've finished.

For decades, our industries have had a working relationship
as forest practices determined the primary wildlife
management taking place in the province, an arrangement we do not
regard as wise or fair. Consequently, our views have frequently
been different. Over the past few years, much has changed,
public perception of both our industries has changed and
refined our practices, we frequently participate in the same
public resource management forums, forest cuts and practices
have been revised by government, forest industry awareness
of wildlife needs has increased, and both industries are
looking at the steps necessary to adapt and continue working
sustainably.

One area in which little progress has been made, however, is
improved communication. Forest companies sometimes still regard
trappers as obstacles and trappers often still distrust forest
companies. The British Columbia Trappers Association (creation
of corporate membership is designed

- To improve communication with forest corporations
- To better inform them of trappers interests, concerns and activities
- To provide corporations with similar opportunities through the magazine
- To encourage corporations to incorporate their support of good wildlife management and the fur industry

We believe that our relationship can become more cooperative
and beneficial, that we both can be better understood. Environmental
concerns can be better understood and addressed.

October 26, 1998

Mr. Bruce Davies
Box 2
Surge Narrows, B. C.
V0P 1W0

Dear Mr. Davies,

RE: TFL 47 MP No.2 Comments

Thank you for your comments pertaining to the Johnstone Straits Management Unit, dated September 20, 1998.

We concur with your suggestion that the harvesting of old growth should be blended into the annual harvest over a longer time frame in order to better approximate the actual harvest pattern. We will endeavour to integrate your suggestion into the next yield analysis.

The Central Coast Land and Resource Management Plan (CCLRMP) process and the Biodiversity Emphasis Options are also expected to be completed prior to the preparation of the next yield analysis and will likely result in further constraints to seral stage distribution.

Total Age referred to in your appended page is determined first by measuring the age at DBH, then adding the appropriate years of growth using standard species/site specific MOF age correction tables.

Again, thank you for your time and effort to comment on the Plan.

Yours truly,

Gilbert M. Brennenstuhl
Manager, Forest Tenures

B. Davies
Box 2
Surge Narrows, BC
V0P 1W0

September 20, 1998

TimberWest Forest Ltd.
Attention: G.M. Brennenstuhl, RPF
PO Box 11101
Vancouver, BC V6E 3P3

Dear Mr. Brennenstuhl:

Further to my previous fax, my comments on the Johnstone Strait Management Unit in MP No.2 are included below. I have also included a separate page on what I think would be improvements to MP No. 2's word usage, measurement, and graphics.

After I sent my September 2, 1998 comments, I learned that culmination of MAI age in the best sites is much younger than I thought. It does not appear that the MP No.2 Base Case would generate long run rotation ages that are much younger than the best site CMAI ages, so the bell curve 'a' in the Figure 1 that I sent may not apply for the best site class. In the context stated, my estimation of a two million tonne relative shortfall of stored carbon in the Courtenay and Nanaimo Lakes Units may therefore be an over-estimate. But the bell curve 'a' effect was an estimate of the Base Case. The Base Cases are different from the plans that MP No. 2 actually proposed, and are now in place. The 'Real Cases' are different from the Base Case in the Courtenay Unit, and very different from the Base Case in the Johnstone Strait Unit. For Johnstone Strait, this difference will offset my error considerably, as will be seen in the following.

Much of the support information for the transitional harvest rates that are proposed for the next fifteen years is information on the actions and effects of the Base Case. This information shows that falldown is being ended too hastily. Because the proposed increases to harvest levels are premature, they are excessive for the time frames, and will have negative long run effects. To change the forest level management plans from the Base Case to another option, without reducing the short-term rates, will only modify the negative effects, and will not remove them. The only solution is to end falldown less hastily. The Base Case has tended to confuse this point, but it also illustrates it.

Although it is recognised to be operationally too costly, and otherwise unacceptable, the Base Case for Johnstone Strait simulates very heavy harvesting of the old growth that remains on 10% of the THLB, mostly on the poorer sites. For the first ten years of the simulation, average harvest age is over 200 years (Figure 6-5). This simulation would delay the substantial cutting of second growth by up to ten years, adding that much to the harvest ages, and generally $>100 \text{ m}^3/\text{ha.}$ to stand volume before cutting. The delay effect would be a long-lasting permanent chain reaction in the harvest flow of the Base Case, and it is a main factor of the results shown in Figures 6-3 to 6-6. Given the harvest level proposals of the 20 year plan and MP No. 2, only the Base Case through its sacrifice of old growth would generate the results that are shown and described. These results to growing stock, age class composition, average harvest age, average volume per hectare, etc. are perhaps only barely adequate if the decimation of old growth can be discounted; which it cannot.

Since a ten year delay in the cutting of second growth is not an option, reasonably satisfactory long run results can only be provided by delays to the increases in transitional harvest rates that are shown in the early years of the Base Case. Instead, MP No. 2's Real Case harvest level in the Johnstone Strait Unit is a large increment in a trend toward unsatisfactory results. If MP No. 3 continued the same harvest rate as MP No. 2, then MP No. 4, ten years from the present, would be cutting stands that MP No. 2's Base Case would not cut until up to twenty years from the present. By ten years from the present, the younger harvest age, lower average harvest volume per hectare, and greater area cut per year of the Real Case compared with the Base Case would be self-perpetuating, and not reversible except through a falldown, relative to the Base Case flow. Relative to the six results shown for the Base Case (Figures 6-3 to 6-6), negative effects with the Real Case may be in the order of $>10\%$, even if a gradual cutting of old growth is factored.

Growing stock will not achieve so steep an increase during MP No. 2 as is shown in Figure 6-3. Over the 200 years growing stock would appear generally flat, with a shortfall of about one million tonnes of carbon storage below the Figure 6-3 amounts, about 30 years from the present. Other negative effects that I discussed regarding the Courtenay Unit (forest fragmentation, fossil fuel requirements of harvesting and processing, and quicker release of carbon from the harvest volume) will also be much worse with the Real Case in Johnstone Strait, compared with the Base Case.

The Real Case for Johnstone Strait would equal the harvest flow amounts of the Base Case, until almost the year 2014 in Figure 6-2. After that, the Real Case would not be able to attain the long run sustainable amounts that are indicated in Figure 6-2. The netdown would be much less than the effect in Figure 6-9, but even one-eighth of that effect would be in the order of the netdowns to overall supply unit LRHL that were approved for the VILUP SMZs. In the Johnstone Strait Real Case the netdown would be the simple result of short-term over cutting, which is inappropriate.

The sensitivity of the Base Case to VDYP estimates in Figure 6-11 appears to further illustrate the importance of delays to the harvesting of second growth. Old growth and

stands older than 40 years comprise almost the entirety of the harvests in the first decades of the Base Case simulation. When VDYP estimates are assumed to be 10% greater, the harvesting of managed second growth is even more delayed because less area is cut in the early decades. Managed stand volume per hectare then becomes greater before cutting, and less area is cut per year throughout the VDYP +10% simulation to meet the same target as the Base Case. The viewscape constraints (spatial determinants) are then not challenged, and the second century falldowns attributed to viewscape constraints in the Base Case are not experienced.

Beyond general observations, a review of MP No. 2 cannot avoid hopeless complications. The Base Case is not the Real Case, in spite of volumetric similitude, and understanding the implications to the Real Case of sensitivity of the Base Case to changes in assumptions or plans is unduly convoluted. All the more so when the proportion of old growth varies with Unit, so that the differences between the Base Cases and Real Cases also vary with Unit, and so do the meanings of the sensitivity results. Clearly it is essential to redesign the Base Case parameters to more closely represent the Real Case for each Unit.

To summarize, the MP No. 2 Base Case for Johnstone Strait is not an acceptable unit-level harvest scheduling plan, and it is a premature beginning to the end of falldown, with a harvest rate increase that is too large for the time frame. Further, the long run results of the Base Case are benign to most of the THLB, compared with the Real Case. The Real Case, will have long run effects similar to those described for the Base Case in the Courtenay Unit. For a short-term surfeit of volume, MP No. 2 would create a long-term treadmill of harvesting more area/yr. of younger, lower vol./ha. stands. These are not the effects needed to make coastal British Columbia's forest management highly productive in value, low in operational costs, and low in environmental impact. The effects of the Real Case would transpire with incremental irreversibility during the scant couple of decades remaining in the conversion of the Johnstone Strait Unit.

To revisit the Courtenay Unit, my previous comments on the Base Case may be conservative for the Real Case. Average harvest ages during MP No. 2 were simulated for the Base Case at >100 years whereas the Real Case harvests average younger than first entry age. The before FEA harvests and the amount of harvest volume that is generated by young first entries should be reviewed in the context of the objectives in the Units where young harvest ages substantially occur. If you intend different objectives for your private land units, you should say so.

To rightfully claim to the broad values of sustainability, MP No. 2 would have delayed the proposal to increase harvest level in Johnstone Strait at least until MP No. 3, and would not have contemplated so steep a rise to the long run amounts. When drafting MP No. 3, please keep in mind the general effects explained above. In the final stages of conversion, harvest level increases that are initiated soon have greater permanent effects than the same increases initiated later. Conversely, restraint practised sooner has much more beneficial effects than restraint practised later. The negative effects of

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overcutting can only be reversed by falldown, which tends to make negative effects permanent. For these two Units that I have reviewed, I strongly suggest a plan to reduce harvest levels in MP No. 3.

Sincerely,

Bruce Davies

Bruce Davies

jo

Enclosures

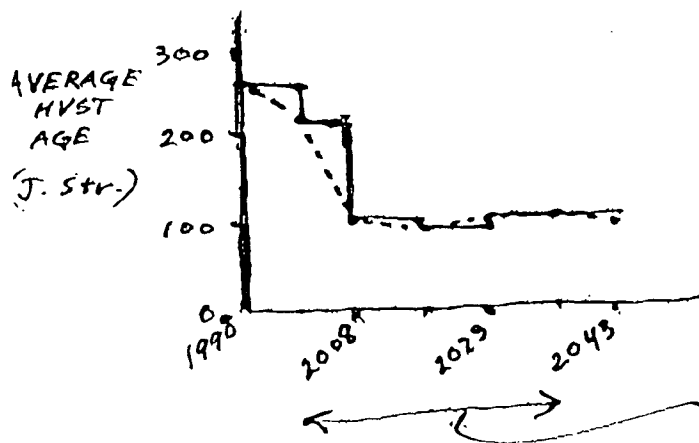
cc: L. Pederson
K. Collingwood
D. Slugget

MP no. 2 - further comments - B. Davies Sept. 9;

Rotation:

Please do not use this term to refer to minimum cutting age, current cutting age, FEA, etc. Reserve the term Rotation for the use as defined in FPC standards. I suggest that the time of "formation or regeneration" should be regarded as the time of seed sprout, then with your planned planting delay of 2 years and the planting of 2 year old stock, Rotation will equal Total Age (at time of harvest).

Culmination Age years; FEA:
should be measured by Total Age. MP no. 2's TSA info pkg p. 61-65 appears to measure culmination age by age at breast hit. (4 to 9 yrs less than Total Age at which MAI culminates).
Please specify how you measure age.



The 'connect the dots' graphs in MP2 are not accurate representations (dash line shown here). Please use running bar graph as per Mof TSR's (solid line shown).

Please maintain same scale in all cases.

October 26, 1998

Drew Williams
The Sierra Club of British Columbia
Box 219
Heriot Bay, B. C.
V0P 1H0

Dear Mr. Williams,

Thank you for your comments on Management Plan No. 2 for TFL 47.

You raised the concern that the harvest rates for Quadra Island as indicated in the Forest Development Plan are too high. Age class distribution and economic efficiency often dictate that harvesting be concentrated in a given area for a short period of time. Conversely, there have been 5 year periods, such as 1990 -1994, when the actual harvest on Quadra Island was substantially lower.

Your comments concerning the long term implications of the interaction of first entry ages and harvest rates, raises some interesting issues regarding the harvesting of young stands over the long-term. These issues will be explicitly addressed in the timber supply analysis required for M.P. No. 3. You will have an opportunity to review and comment on draft MP No. 3, including the proposed 20-year plan, during the public review process tentatively scheduled for June/July 2000.

Yours truly,

Gilbert M. Brennenstuhl
Manager, Forest Tenures



The Sierra Club of British Columbia - Quadra Island Group

Box 219, Heriot Bay, B.C. V0P 1H0

September 1, 1998

G.M. Brennenstuhl, R.P.F.
TimberWest Forest Ltd.
PO Box 2500
Campbell River, BC V9W 5C5

Dear Mr. Brennenstuhl,

We are submitting comments on this review, though we find it unfortunate that the timing for public input into this document is over the summer months when most volunteer organizations do not meet. As a consequence, we are only submitting general comments on the plan and in particular its impact on Quadra's forests.

It is difficult to understand the relations between management Plan No. 2 and the cutting plan on Quadra, but a discussion of objectives and harvest rate on the Quadra TFL land should be relevant to the review of MP2 and the drafting of MP3.

As regards the harvest rate on Quadra, the cutting that is scheduled in the Development Plan must be considered as a "spike". Quadra has only about 12% of the Johnstone Straits management unit's THLB, but is scheduled for about 19% of the unit's total volume cut. A five year total of 207,000 m³ is scheduled for the SMZ 19 portion, or an average of about 41,000 m³ per year. We note your suggested "further reduction of up to 10,000 m³/yr for the SMZ (P. 7, Timber Supply Review, Appendix III). We also recognize the harvest level deliberations for SMZs are now in a provincial-level targets process, with "bottom-up" considerations.

Harvest level "spiking" is definitely excessive on the northern peninsula GMZ portion of the TFL on Quadra. In this portion, which is about 3% of the Johnstone Strait's THLB, approximately 10% of the straits total 5 year cut is planned. Changes to the cutting plans also seem to be adding to Quadra's total cut amount. To balance out the excesses of volume during MP2, and to account for the SMZ, MP3 should expect a much smaller volume from Quadra Island.

The long run objective that is stated in the S.P.s on Quadra ("a rotation of approximately 45 years or more. Minimum stand characteristics at rotation are a quadratic mean diameter of 30 cm at breast height and an average volume of 300 cubic meters.") suggests an intention to deplete the resource to the point of sustaining a need to harvest immature crops. In our understanding of the rationale for first entry ages and "before FEA", and for the AACs in MP2, this was not the intent. We doubt that the SP objective is really approvable especially in Quadra's forests of high productivity (presently showing volumes

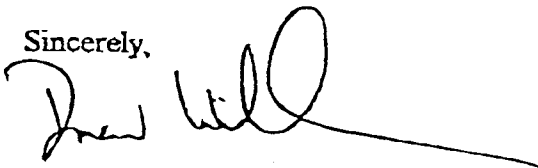
in the 700 m³ to 800 m³ range). The minimum stand characteristic stated in the S.P. would result in a plan for future harvests at less than half of their potential volume per hectare. This objective is contradictory to all objectives in any zone. We think that this long-run objective should be rewritten now to exclude such short rotations. The present strategy, or harvest actions that would cause this long run effect should be changed during MP2, if possible.

On page 46 of "AAC Rationale for TFL 47" Larry Pedersen stated "I am requiring that the characteristics of stands and the age at which they are harvested be monitored to validate assumptions in the timber supply analysis and proposed in MP No. 2" We would like a copy of these monitoring results along with the first draft of MP3.

In MP3 you should provide information to show that the present FEAs will phase out quickly and not become a permanent feature for anything but an insignificant area. To do that, our feeling is that you will need to lower the overall harvest rates.

In conclusion, it appears that Quadra - which is mainly in a SMZ - is receiving approximately 20% of the cut for Johnstone Strait when it only represents approximately 12% of the THLB. We feel that the harvest rate for Quadra of 395,350 over 5 years is too high and this must be taken into consideration when planning the AAC for Johnstone Strait Management Area in MP3.

Sincerely,



Drew Williams
Chair, Sierra Quadra

cc: Ken Collingwood
Regional Manager, Vancouver Island Forest Region
Ministry of Forests
Fax: 751-7190

Don Sluggett
District Manager, Ministry of Forests
Fax: 286-9300

Jim Walker
Special Advisor on Special Management Zones
Ministry of Environment, Lands and Parks
Fax: 387-5669

October 26, 1998

Judy Johnson
Bruce Davies
Box 2
Surge Narrows, B. C.
V0P 1W0

Dear Ms. Johnson, dear Mr. Davies,

Re: Public Review and Comment on TFL 47, Management Plan 2

Mr. John Andres of the Forest Service in Campbell River relayed a message to us that you requested

“information on the land base summaries for Quadra..... a report which summarizes SMZ/GMZ by total land base and timber harvesting land base by G/M/P site”

Apparently, you have already determined that those reports are not part of the current management plan as the SMZ/GMZ designations did not exist when MP No. 2 was prepared. In the event some of the information becomes available in the process of preparing the yield analysis for MP No. 3 (currently scheduled to start in mid 1999) it will be available for review as part of draft Management Plan No.3.

We thank you for your interest in the management of TFL 47.

Yours truly,

Gilbert M. Brennenstuhl, R.P.F.
Manager, Forest Tenures

October 26, 1998

Shirley Ward
Diana Caldwell
RR4, Site 430, C27
Courtenay, B. C.
V9N 7J3

Dear Ms. Ward and Ms. Caldwell,

Thank you for taking the time to comment on Management Plan No.2 for TFL 47.

You have made numerous suggestions, many of which go well beyond the Forest Practices Code requirements.

TimberWest is committed to conducting its TFL operations in full compliance with the Forest Practices Code. In that context your comments will be given due considerations when we prepare Management Plan No. 3.

Once again, thank you for the time taken to provide us with your comments.

Yours truly,

Gilbert M. Brennenstuhl
Manager, Forest Tenures

RR4, Site 430, C27,
Courtenay, BC,
V9N 7J3
01/09/98

TimberWest Forest Ltd.
PO Box 11101
Vancouver, BC
V6E 3P3

Dear Mr, Brennenstuhl,

Enclosed are our comments on TimberWest's Management Plan #2 for TFL 47. On August 28 th, these comments were faxed to Steve Lackey and the Ministry of Forest (John Andres). The latter informed me in an E-mail that they were actually supposed to come to you first.

We thank you for your attention to this submission, and we hope that it will assist your company in making environmentally sound decisions in all planning and activities in the Tsolum Watershed.

Yours sincerely,



Shirley Ward and Diana Caldwell
(250) 337-1929 or 337-8397
e-mail: taynen@island.net

Comments on TimberWest's Management Plan #2
Shirley Ward and Diana Caldwell 337-1929 / 337-8397

28/08/98

(This contains additional comments and specific details to our submission of 28/08/98. We would appreciate it if you would consider this as the final copy.)

We are concerned citizens and Streamkeepers specifically familiar with the environment of the Tsolum Watershed.

The following are our comments on TimberWest Forest Company's Management Plan #2 for the Courtenay Unit of TFL 47, and its impact on the forest lands and watersheds of the Courtenay area.

1. Watershed Management Planning

- Large areas of the Tsolum/Puntledge Watershed are currently being clearcut for the construction of the new Island Highway and as part of TimberWest's managed forest lands. The clearcutting is having an enormous impact on the ecology of the Tsolum Watershed. (Specifically, take a look at what the combined cutting by VIHP and TW has done to the area between Headquarters Creek and Pup Creek. Much of the cover has been removed from Pup Creek and created the potential for sedimentation and warmer water temperatures, lethal to fish. Seasonal streams in the area are also at risk for sedimentation. Other wet areas are parched and dry now that the cover is gone..

We feel that a Coastal Watershed Assessment should be done on the Puntledge/ Tsolum system at the earliest opportunity and that Management Objectives designed to protect and enhance BC's Most Endangered River be drawn up and enforced. Areas of specific concern are : Riparian Management, Water temperature, Sediment Control, Cover, Large Woody Debris, and Wildlife Corridors.

-TimberWest's private Managed Forest Lands and their lands in the TFL should be considered together in an integrated watershed plan.

2. Riparian Management

-The Courtenay Unit contains much of the watershed of the endangered Puntledge / Tsolum River system. Good riparian management is critical to ensure that damage from logging does not further degrade these rivers.

- The size and timing of clearcuts should be planned to ensure that flows are not affected.

- Adequate riparian vegetation should be left to provide shade, nutrients and soil stability, and should include conifers as well as deciduous trees to ensure a future source of long-lasting woody debris. S4 to S6 Streams should have riparian reserves, especially in the Tsolum watershed where Coho are being found in many of the smallest streams.

- The effect of logging on water temperatures is of particular concern. For example on TimberWest's managed forestlands along Pup Creek, the clearcut comes to within 4.5 m of the creek, and only scattered deciduous trees have been left. The cover left is inadequate to shade this fish-bearing stream and maintain acceptable summer temperatures.

3. Wildlife Habitat

The protection of wildlife habitat would be improved by modifying silviculture practices. We would like to see increased use of partial cutting, smaller clearcuts separated by linked wildlife corridors, particularly along streams, and the retention of deciduous trees and understory wherever possible.

- Wildlife corridors should be given particular emphasis to compensate for the continuous clearcut along the Inland Highway right-of-way. This clearcut bisects the entire valley and is a major barrier to wildlife movement.

4. Biodiversity

- The Courtenay Unit consists largely of even-aged young second-growth. It contains very little mature forest with old-growth characteristics. The age and species mix within the Unit should be diversified over time.

- The few areas of older growth should not be cut, and additional areas suitable for meeting VIRT seral stage targets should be identified. These areas should be representative of the range of soils and vegetation within the Unit, not just sites with low-quality timber.

- In-stand biodiversity should be promoted by planting mixed species, and leaving wildlife trees and deciduous trees within replanted stands.

- We note that TimberWest's existing plan states that they are converting stands to original species. We strongly support this objective, especially the re-establishment of western red cedar on moist low elevation sites. However, we have not seen evidence that this is happening. Their practice seems to be to plant Douglas fir in all sites, since this fast-growing species provides the best economic return.

5. Viewsapes

- Viewsapes are very important in the Courtenay Unit because of its proximity to population centres and tourist destinations.

- Tourism is one of the Valley's major industries. A visually attractive working forest will help to ensure return visits, and could become a tourist attraction in its own right. The Tsolum and Puntledge Rivers, and Comox Lake, are largely within the Courtenay Unit. Residents and visitors make extensive recreational use of these waters. Visual Quality Objectives must include a consideration of viewscales for these recreational users.

6. Logging in Settled Areas

- Silvicultural Practices should be modified in areas close to rural residential neighbourhoods. We would like to see TimberWest set up some process for consulting local residents on forest development, logging plans and other activities affecting these areas. The size of clearcuts should be less than 4 hectares, and attempts should be made to use more partial cutting methods. Furthermore, particular attention should be paid to viewscales, and logging methods should minimize noise and disruption.

7. Private Land Management

- Forest Practices Standards for private managed forest lands should not be applied to TFL lands. The Forest Practices Code must continue to apply to all lands within the TFL, and every effort should be made to retain lands within the TFL.

- Citizens of the Comox Valley, unlike most other communities of BC, have very little control of what is happening on the (mostly private) forest lands here. We do not want to see the little control we have bargained away in return for Rossiter and Divers Lakes or for Goal 2 lands on southern Vancouver Island.

- There is a strong feeling throughout our neighbourhood that projected cutting on all lands of the Tsolum Watershed is too intensive.

- If the Ministry of Forests is unable to have any control over TW's clearcutting of their private managed forests, then even greater measures for mitigation and enhancement must be required on TFL lands.

8. Environmental Policy

One of TW's Objectives (page 14) in the Management Plan, is as follows:

Environmental protection will be a planning priority and activities will be sensitive to local conditions, needs and values.

And further that:

Forest operations will be conducted with the objective of sustaining existing ecosystems.

It sounds good on paper, but we're not seeing evidence of this along the creeks, tributaries and wetlands of the Tsolum. Due to the endangered status of the Tsolum, and the concern and involvement of the community in its restoration, we would like to see TimberWest pay more than lip-service to this on both their TFL and Private lands.

- How often is external and internal monitoring being conducted to ensure that environmental objectives are being met? What specific monitoring has been done in the Tsolum / Puntledge Watershed? Are these reports available to the public? —

- What is TimberWest doing in the area of employee/ operator training programs to enhance environmental objectives? Does MoF receive specific details on training sessions, and what specifically is being planned for the next 5 years?

October 26, 1998

Bruce Davies
Box 2
Surge Narrows, B. C.
V0P 1W0

Dear Mr. Davies,

Thank you for your comments on Management Plan No.-2 for TFL 47.

As you noted in your letter, the regulatory and economic environment for coastal TFL holders has changed since the timber supply analyses for MP 2 were undertaken. The five year cycle (4 years only for this MP) for re-submitting the MP provides an opportunity to re-evaluate the estimates of sustainable harvest rates in light of these changes.

In your letter, you raised an issue concerning the potential impact of alternate harvest strategies on carbon balances. TimberWest's intention is to manage the TFL for fibre production within the requirements of the Forest Practices Code. The issue of carbon balances will not be explicitly dealt with in the next Management Plan.

However, your comments concerning the long term implications of the interaction of first entry ages and harvest rates, raises some interesting issues regarding the harvesting of young stands over the long-term. These issues will be explicitly addressed, in the Timber Supply analysis required for M.P. No. 3.

Yours truly,

Gilbert M. Brennenstuhl
Manager, Forest Tenures

Bruce

Torn

more MP
comments.

Bm.

B. Davies
Box 2
Surge Narrows, BC
VOP 1WO

September 2, 1998

TimberWest Forest Ltd.
Attention: G.M. Brennenstuhl, RPF
PO Box 11101
Vancouver, BC V6E 3P3copy to Jim for comment
880910

Dear Mr. Brennenstuhl,

Thank you for the invitation to comment on MP No. 2, for TFL 47. I also appreciate the many reports, charts, and tables, etc. that are provided in this plan. None of this information has put aside my misgivings that the plan describes various levels of short-term overcutting of volume, and continuous overcutting of area. This surfeit appears to be greatest in your private land units at Courtenay and Nanaimo Lakes. I did not have time to study the Bonanza and Moresby units. For Johnstone Strait, I will try to send some brief comments very shortly. Here, I will comment on objectives and harvest levels at Courtenay, which will apply to different degrees in the other units.

First, I should clarify two points. In general I am not opposing a policy of young first entry ages where this is needed to remedy age class imbalance, or to reasonably streamline operations. It is the amount of such cutting and the amount of cutting at any age that is implicated in the following. Second, I am using the term rotation in its long run sense only, as defined in the FPC standards, which is not synonymous with current cutting ages or first entry ages.

Figure I, enclosed, regards the total of medium site class THLB area in a unit, and estimates how much area would be apportioned to each long run rotation age (i.e. in the long run, how much of the total area would have what cutting age). Judging by the information on long run cutting ages for Courtenay, for each of the site classes in the unit, the base case would result in a version of the bell curve "a" in Figure I. This generic result is continued harvesting mostly at or below culmination age, with a small proportion where rotation age will be much older. The other site classes would be similarly configured relative to their culmination age. The bell curve "b" shows more normal long run results, with rotation ages spread over the plateau of culmination, plus

2

the small older portion. Judging by MP No. 2, curve "c" would represent the results of the culmination FEA flow that was used in sensitivity analysis.

Figure II is a medium site C.D. Fir 12.5+ MAI curve, which shows how the bell curves "a" and "c" above could have about the same long run sustained volume harvest level (same average MAI). The bell curve "b" would sustain a greater harvest level, near the potential maximum.

Figure III illustrates the differences in the causes of the three bell curves. Long run rotation age has this hyperbolic or multiplicative inverse relation with current, ongoing average area cut/year in the total area of a site class. Younger (than culmination) long run rotations are caused by disproportionately greater current, ongoing spatial harvest rates (i.e. a 50 year rotation is 37.5% younger than 80 years, but its cause is 60% more area cut/year; 2% instead of 1.25%). With the younger rotations, forest fragmentation is also disproportionately greater, operational efficiency (area cut/m²) is disproportionately inefficient, and surely, constraints would be disproportionately more constraining.

Where spatial harvest rate is greater than the rate that eventuates culmination of MAI, the short term volume flow is a surfeit. This surfeit gradually reverses over a few decades, and the high spatial rate is then no longer a choice, but is needed to maintain an albeit diminished annual yield relative to the potential (i.e. toward the left and downward on the MAI curve in Figure II). Any degree of spatial overcutting and its effects resemble a degree of overfishing and its effects.

The projected increases to growing stock in TFL 47's units does not contradict this description of partial resource depletion. An undue proportion of the best sites are around the age of maximum current annual increment so total growing stock is now low, and it is growing fast. Overcutting slows down this increase to growing stock, and would reduce its eventual stable level.

A measure of the actual long run depletion to stands, landscapes, and units caused by high spatial harvest rates is indicated by the lower 45 year rotation cumulative curve in Figure IV, enclosed. Relative to the 80 year culmination of MAI rotation (17), growing stock and total carbon storage in the 45 year case are impoverished. Relative to the 130 year rotation (27), they are decimated. In Figure B it is easy to read that the base case range of rotations (bell curve "a" in Figure I) would be >50 tonnes/ha. less in carbon storage than the range of rotations in curve "b" of Figure I. In Courtenay and Nanaimo Lakes alone that could amount to a relative shortfall of over two million tonnes, perhaps 30 years from the present. This effect should be illustrated in MP No.3 by showing total growing stock over time for a realistic option for comparison with the base case.

It should be noted that long run rotations and related effects are functions of spatial harvest rate regardless of the age of the stands that are cut during the period of conversion. Thus, the young FEA strategy is not in itself a big issue for long run

sustainability. The area of such cutting plus other cutting is the issue. I think your formula for FEAs is fine for medium and poor sites, but the 30 cm/300m³/ha. guideline results in too young an FEA for the better sites (down to 35 and 33 years). The current experiment in which 20% of the AAC may be even younger than FEA is excessive, and too young for the best sites. Harvest rates should be such that the need for cutting at early FEAs would be a more moderate amount that would phase itself out, and not become replicated in young long run rotations.

Although the harvesting of immature stands as an interim measure may not affect long run sustainability, there are serious short-term implications. Per m³, at 45 years of age the wood from a medium site of C.D. Fir is about 35% greater in the recovery of chips (bdu/m³), and about 15% less in the recovery of lumber (bf/m³) than it is at culmination age. Thus, the pulp stream, with virtually an immediate release of half of its carbon, and a much higher fossil fuel requirement, is being overfed, while less carbon is being stored in wood products. In moderation, and temporarily (those go hand in hand), this extra release of carbon may be justified by the short term needs of industry, communities, and government. The base case overdoes the present effect, which would make low carbon storage in wood products a permanent feature, along with low carbon storage in the forests.

Management plans should help in the choice of a desired future state of the forest, and benefits to the economy, environment, etc. To do that, MPs should provide information about realistic options in those states. The culmination FEA flow that was presented in MP No.2 as a counterpoint to the base case is not realistic, which limits the usefulness of the comparison, and causes confusion. During the short and mid term (several decades) this second option would have amounted to special management in some units. The base case is also an option on the level of land use decisions because it amounts to high intensity forestry, as that was perceived at the time of the TSR (1994), and soon after questioned and re-characterized.

Several of the main factors that supported the base case from TimberWest's point of view have changed since the early and mid 1990s. The world market for the products of smaller diameter logs, which you viewed as "increasingly favorable" in 1996 is now unfavorable, with no improvement in sight for British Columbia's competitiveness, according to some industry analysts. Several of the "current regulatory requirements" that you cited as part of a "new paradigm for harvest planning" are no longer current. The VQOs and old growth retention have been substantially diminished. The cutblock adjacency constraints that were a main determinant of MP No.2's strategy are still intact, but along with clearcut size they may not be for long in your Enhanced Zones. The changes in markets underline the need for the operational efficiency that a lower spatial harvest rate can gradually provide, and relaxed constraints should be seen as reduced costs, not a license for indiscretion in harvest rates.

In summary, considerations of changed conditions, issues, and information since 1994 make for an in-depth review of MP No.2 and its timber supply analysis. Also, the either-or focus in MP No.2 on young FEAs, or no young FEAs, limited the usefulness of

4

the analysis of the base case and of culmination. When long run rotations are being discussed, analysis of realistic options in space, productivity, and by site class, is important. This submission suggests a more moderate short term harvest flow, a slower transition to long run harvest levels, and a more moderate, essentially interim-only use of the young FEAs. MP NO.3 should do better in the sustainability criteria that were cited in MP No.2, and by important above mentioned criteria that were not cited.

Sincerely yours,



Bruce Davies

jo

cc: L. Pedersen
K. Collingwood
D. Slugget

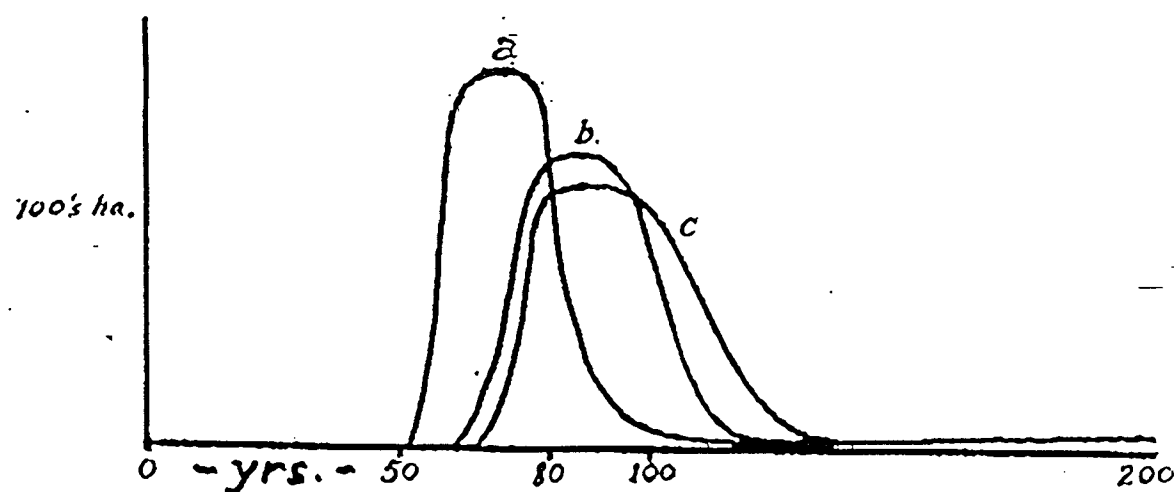
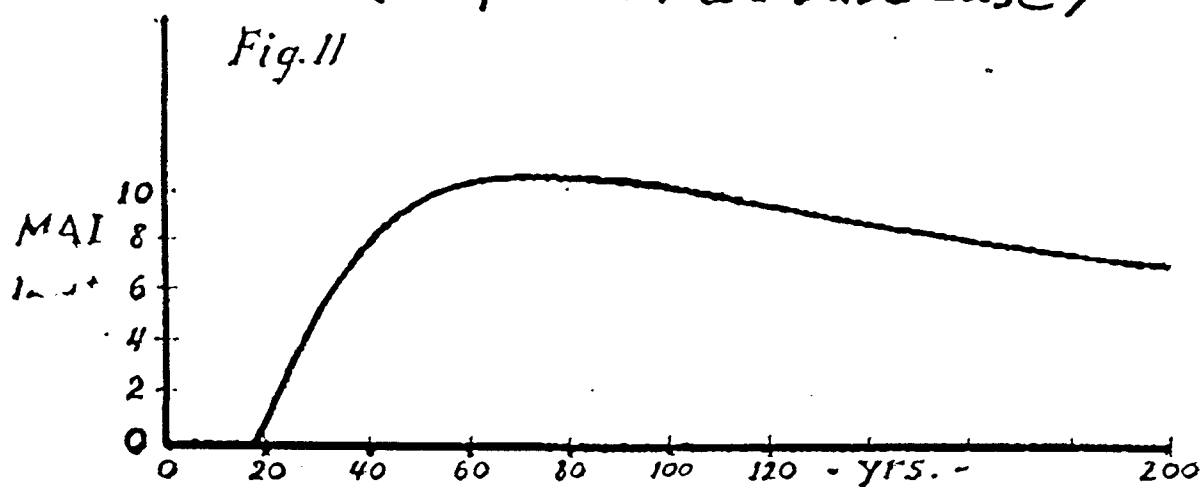


Fig. I, medium site: area by long run rotation
(3 options; a = base case)

Fig. II



MAI by long run rotation. site 30-c.d.fir - 1111 stems/ha.
 delay = 0 yrs. (netdown effect is inverse prop. w/rotation)
 OAFs = 0% (may vary inversely w/rotation).
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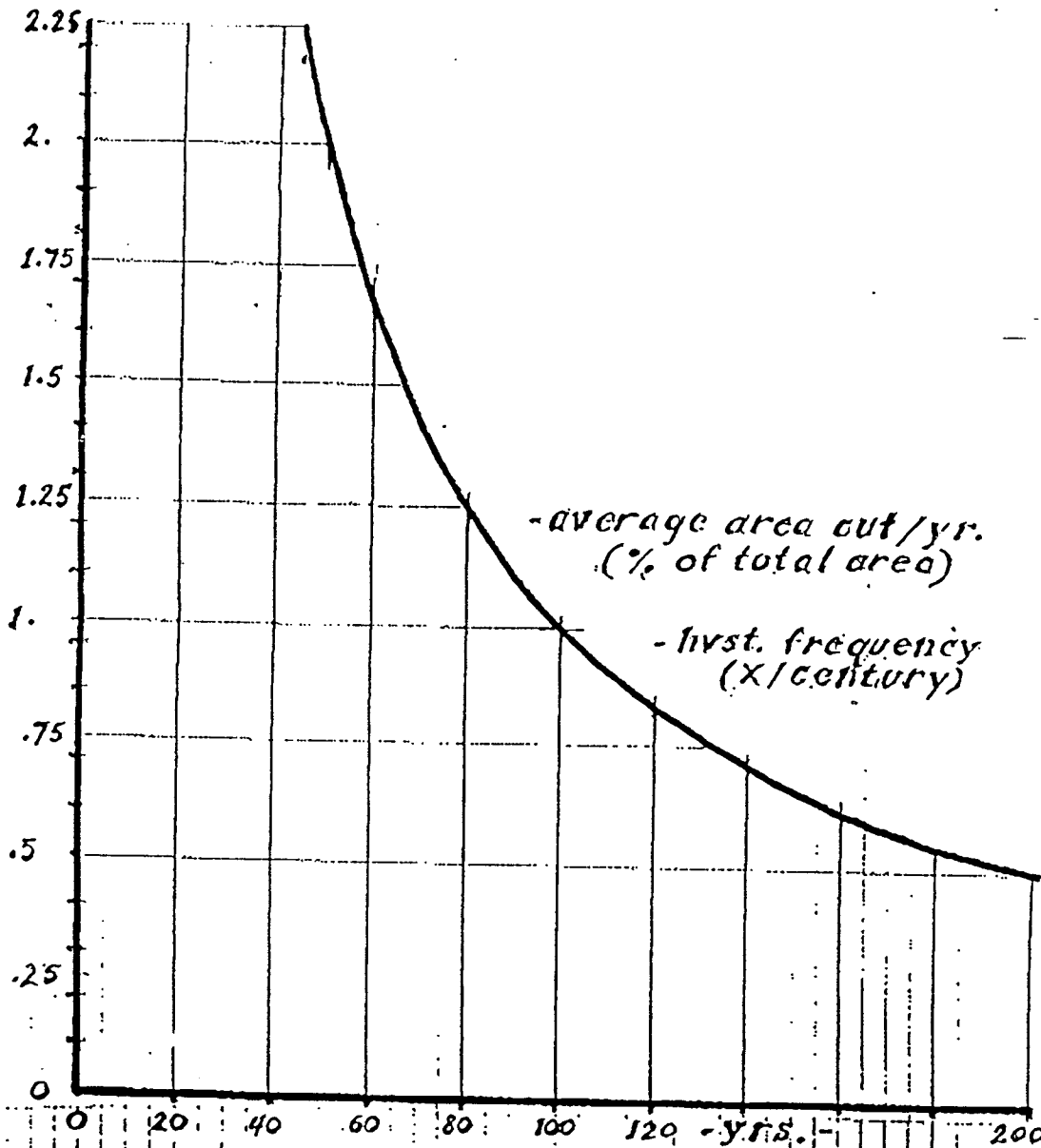
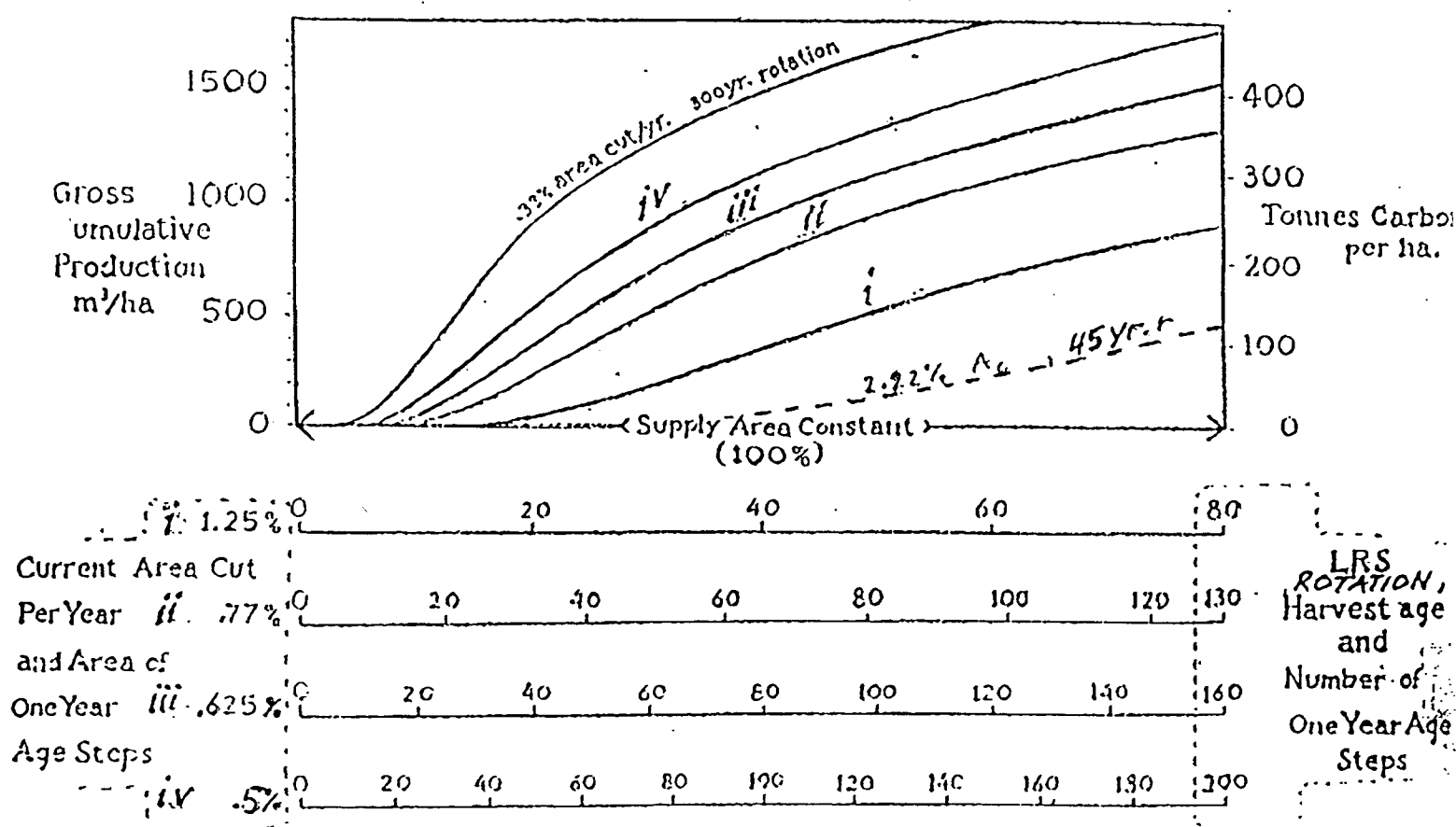


Fig. III, Spatial harvest rate and hvst. frequency by long run rotation

FIG. IV. LONG RUN SUSTAINED AGE CLASS DISTRIBUTION, STAND and LANDSCAPE GROSS CUMULATIVE VOLUME and CARBON STORAGE IN BOLEWOOD by CURRENT SUSTAINED AREA CUT PER YEAR



Public Review Of Draft SMOOP

(February 4th, 1999 – March 3rd, 1999)

Town of Port McNeill

P.O. Box 728
Port McNeill, B.C., V0N 2R0



Tel: (250) 956-3111
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1775 Grenville Place

File:

4 March 1999

C.C. Dave Simpson
880312

TimberWest Forest Limited
Suite 2300, 1055 West Georgia St.
P.O. Box 11101 Vancouver, British Columbia
Canada V6E3P3

Dear Mr. Brennenstuhl:

On behalf of the Town of Port McNeill, I am responding to your Draft Statement of Management Objectives, Options and Procedures and Draft Objectives for Employment and Economic Opportunity (SMOOP and OEEO).

The Town of Port McNeill supports TimberWest in its efforts to maintain or enhance its harvest volumes through the "Actions" listed in the Management Issues section of the Draft. We also encourage the Provincial Government to reduce the regulatory burden imposed on the industry particularly those compounded by the Forest Practices Code.

As a significant employer of our townspeople, TimberWest also enjoys our full support in their efforts to gain approval to harvest timber on Hanson Island.

With the current Asian market situation, stumpage burden, and regulatory obligations, the forest industry requires governmental policies from all agencies including the Ministry of Environment that are strongly supportive instead of adversarial.

The Town of Port McNeill has been fortunate to be home to companies like TimberWest and your continued success is important to the whole community.

With best wishes,

Gerry Furney
Mayor



Suite 2300, 1055 West Georgia St.
P.O. Box 11101
Vancouver, British Columbia
Canada V6E 3P3

Phone 604.654.4600

April 19, 1999

Mr. Bruce Davies
Box 2
Surge Narrows, B. C.
V0P 1W0

Dear Mr. Davies,

Thank you for your comments on the draft SMOOP for TFL 47. With this letter we hope to answer both your letter addressed to TimberWest and your submission to the Regional Manger.

TimberWest has been involved in a number of business transactions involving name changes. The name of the company holding TimberWest's public tenures is TFL Forest Ltd.

We accept your comments regarding changes to the management units. Currently, there are no plans to change the management units: Johnstone Strait (Blocks 1 – 12), Bonanza Lake (Block 17) and Moresby Island (Block 18).

The proposed AAC of 726,528 m³ was arrived at by taking the latest approved AAC (reduced from the 1996 AAC to reflect the change in ownership), subtracting 140,000 m³ for Nanaimo Lakes and Courtenay and adding 30,000 m³ for alder.

You state quite correctly that alder is already part of the current AAC. But because most of the alder in the Johnstone Strait is at maturity and its merchantability is starting to decline TimberWest is pursuing opportunities to harvest the alder at an accelerated rate before it becomes unmerchantable. For this reason TimberWest is proposing to increase the AAC for the next MP period at the end of which the project would be reassessed to determine if it can or should be continued.

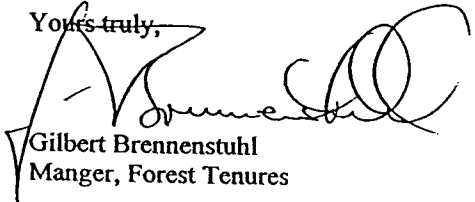
When we detail our second growth strategy in the draft Management Plan we will consider your comments on the current information reports.

We note your concern with "the amount of cutting at any age" and hope that the Twenty Year Plan will address this issue adequately.

While we have not yet decided which sensitivity analyses are required we note your request for a sensitivity analysis around the adjacency constraint.

Again, thank you for taking the time to respond to the draft SMOOP.

Yours truly,



Gilbert Brennenstuhl
Manger, Forest Tenures

c.c. District Manger, Campbell River Forest District
Regional Manger, Vancouver Forest Region

B. Davies
Box 2
Surge Narrows, B.C.
VOP 1W0

cc Brennenstuhl
880324

March 16, 1999

TimberWest Forest Ltd.
Attention: G. Brennenstuhl, RPF
Suite 2300 1055 West Georgia St.
P.O. Box 11101
Vancouver B.C.
V6E 3P3

Dear Mr. Brennenstuhl,

Thank you for your replies to my comments on MP no. 2. Here are my comments on the draft SMOOP for TFL 47.

Your draft summary objective to increase the AAC of the Johnstone Strait Unit has my thumbs down. As you know from my letters, my opinion is that the current MP no. 2 harvest rate at Johnstone Strait is a premature ending to falldown. The current rate is already excessive for the time frame, without a further increase. Although considerations about harvest rate for the years 2001-2005 will not really get underway again until the draft MP no. 3 and its Timber Supply Analysis, the SMOOP raises some objections and observations.

Your new acronym (TFL Forest Ltd.) is confusing, especially as the full company name is not mentioned anywhere in the SMOOP or EEO.

In the Background (p. 3), you have presumed (?) to move blocks 1-3 incl. from Johnstone Strait to Bonanza Lake. A large change to the size of a Management Unit would make it more difficult to understand timber supply and harvest rate through time, from one MP to the next. The re-configuration should not be done without good reason and authorization, which you should state.

In the Management Objectives, p. 4, last bullet, it is unclear how you arrive at the figure of 726,528 m³. It would not be right to increase the AAC to "accommodate" the harvesting of alder. The AAC Rationale, 1996, p. 15, makes it plain that the appropriate amount of alder is already included in the AAC (for J.Str, and for the TFL). On p. 4, you must leave out at least the part: "to accommodate ...alder ... at Johnstone Strait."

Likewise, in Management Issue No. 3, you must leave out the idea: "to increase the Johnstone Strait allocation of the AAC to provide for ... alder." This is nothing but a ploy to increase the conifer portion of the AAC at Johnstone Strait. For the deciduous

strategy, you only need to say how much alder harvesting and where (i.e. blocks 4-12?).

Since you intend to base your second growth strategy (Management Issue no.5) on the current Information reports, please note some changes that should affect those reports:

1. Your private-land Units have been removed from the TFL, and the remainder is very predominantly public land. The TFL management planning and objectives that were accepted in MP no. 2 to accommodate extremes in the private Units will need to be re-considered. Specifically, MP no. 2's amount of harvesting at young ages was only tolerated on your private land. The amount of young cutting should become very small in the new TFL configuration.
2. References to regulatory constraints in Report no. 1 as determinants in harvest planning, will need revision because the constraints have been revised.
3. Your mid 1990's outlook on the ongoing markets for smaller logs and their products needs to be up dated.

Re: Management Issue no. 12, please note that the concern I raised on Sept. 2 and 20 was not just about excessive harvesting of young stands: "It is the amount of such (young) cutting, and the amount of cutting at any age..." I also charted and explained that "long run rotations and related effects are functions of spatial harvest rate regardless of the age of the stands that are cut during the period of conversion." Also: "the area of such (young) cutting plus other cutting is the issue." Other cutting includes alder. Since you intend to improve Issue No. 13, you will probably analyze real effects to long run rotations regardless of the limitations in the statement of Issue no. 12.

Other notes:

You explained in one of your letters that TimberWest does not manage for carbon storage. But you should recognize that the Crown and the public have an interest in the effects of ongoing harvest rates on the storage of carbon in forests and wood products. Likewise, it is of interest that a plan for a high spatial harvest rate and shorter future rotations create greater ongoing fossil fuel requirements in harvesting and processing, and greater environmental impacts per m. of stumpage revenues. Since you do not manage for these values, your view of the public interest in Info Report no. 1, is limited.

In MP no. 3, please provide a sensitivity analysis to changes in the adjacency constraint.

Thank you very much for considering these points. Please continue mailing review copies to Surge Narrows Community Association, or send to my address.

Sincerely Yours,



c.c. L. Pedersen
K. Collingwood
D. Slugget

Bruce Davies
Box 2
Surge Narrows B.C.
VOP IWO

copy to Val C

Aug 5 -

K. Collingwood, Regional Manager,
Ministry of Forests,
2100 Labieux Road,
Nanaimo B.C.
V9T 6E9

Dear Mr. Collingwood,
In the draft SMOOP for TFL 47, you are cited as requesting a strategy for harvesting deciduous leading stands (draft SMOOP, p. 8). I hope that from an MOF perspective you share my very strong objection to part of the licensee's response.

I have no comment on the amount and the location of alder harvesting, although there is the question whether it would be in blocks 1-12, or in blocks 4-12. The part that I object to is the licensee's insinuation that the AAC of Johnstone Strait needs to be increased to "accomodate" the alder harvest.

By your requirements and the notes on p. 15 of the AAC Rationale, 1996, the AAC of the Johnstone Strait Unit already includes the appropriate alder harvest. The AAC also includes the appropriate conifer harvest, which is less than the total AAC. In effect the licensee's deciduous strategy tries to introduce the proviso that the harvest of alder would be contingent on an increase to the conifer portion of the AAC. I trust that you will cause the proviso to be deleted in the final SMOOP, for it contradicts the earlier commitment.

Nonetheless, the licensee may state its conifer objective, even if that is a desire to overcut. The proper place to include an objective about the harvest rate of conifers at Johnstone Strait, is after the Issue # 5 "MOF requested a second growth strategy". Hopefully, such a statement would not refer to AAC increases at Johnstone Strait because the licensee has presumed to shrink the unit by two blocks. An appropriately shrunk AAC for the Unit has not yet been determined, and can't yet be increased.

Thank you.
Sincerely Yours,