

### APPENDIX 4: Changes From Draft Submission

The following changes were made as a result of referral comments received.

Section	Comment	Change
1.4 History	<ul style="list-style-type: none"> <li>History – suggestion to add harvest hectares by year.</li> </ul>	Table changed – harvest area from 1990 – 1999 added. SRMS/MLSIS records used.
2. Inventories	<ul style="list-style-type: none"> <li>Operable Area</li> </ul>	
3.2.5.1. Basic Silviculture	<ul style="list-style-type: none"> <li>Improved stock</li> <li>Minimum stocking</li> </ul>	Section revised. Target stocking level added.
3.2.7.1.2 Windthrow	<ul style="list-style-type: none"> <li>Additional statement requested.</li> </ul>	Statement added: <i>Silviculture prescriptions will incorporate the design of appropriate silviculture systems and block layout that reduce the potential of windthrow.</i>
3.2.8.3 Road Deactivation	<ul style="list-style-type: none"> <li>Last sentence.</li> </ul>	The last sentence pertained to FRBC deactivation of non-status roads covered off by the existing Access Management Plan. Statement clarified: <i>Deactivation works of non-status roads funded under FRBC through FCL's MYA, will follow the approved plan.</i>
3.3.1 Visual Quality Objectives	<ul style="list-style-type: none"> <li>Comments – including visual rehabilitation.</li> </ul>	Section revised. <i>Description of small block strategy and visual management added. Comments in regards to visual rehabilitation added.</i>
3.3.4 Protection of Water Quality and Quantity	<ul style="list-style-type: none"> <li>MP # 7 Approval: " You are required to include unlicensed water users in your inventory of water users in the vicinity of the TFL and include them in your public review strategy for any future management plans or forest development plans for the TFL."</li> </ul>	Section 3.3.4 updated. <i>Section describes strategy for consultation of licensed and unlicensed water users. Requirement specified to include unlicensed water users in strategy – list not included in MP due to privacy concerns and addresses that change each year due to selling of lots. List of interested parties is kept in FCL's office and is included in FDP submissions under referral correspondence. See 3.3.4 for details of strategy.</i>
3.3.5 Cultural Heritage	<ul style="list-style-type: none"> <li>AIA instruction letter.</li> </ul>	Section revised.
3.3.8 Fish and Wildlife Habitat	<ul style="list-style-type: none"> <li>Stream classification.</li> </ul>	As previously indicated in Section 2 Inventories. <i>Fish stream identification is currently being carried out under agreement with FRBC. Field sampling took place in 1999. Final report submitted to MOELP in February 2000 (Kamloops Region). Awaiting Quality Control Certificate. Will submit to District Manager upon receipt of certificate.</i>

Section	Comment	Change
3.3.9 Other Issues	<ul style="list-style-type: none"> <li>▪ Issue # 1 – wording.</li>   <li>▪ Issue # 3 – wording.</li> </ul>	<p>Sentence changed:  <i>A potential opportunity exists to include area that would be removed from the TO into TFL #33.</i>  <i>To date, there are no standards to establish permanent plots for managed stands. Consideration will be given for monitoring managed stands for increased growth and yield information that would aid in ameliorating any timber supply declines due to the FPC or the impending LRMP.</i></p>
4. Consultation and Integration of Harvesting Activities With Non-Timber Users	<ul style="list-style-type: none"> <li>▪ Identify policy statement and Indian Bands.</li> </ul>	Section updated.
5. Impact Summary	<ul style="list-style-type: none"> <li>▪ Visual Quality Objectives – expanded statement.</li> </ul>	Reference to Section 3.3.1 <i>Visual Quality Objectives</i> added.
6. Public Review Strategy	<ul style="list-style-type: none"> <li>▪ Delete section as no longer required under TFL Document, effective March 1, 2000</li> </ul>	Section deleted. New TFL document was not available when Draft plan was submitted.
3.3.2 Biodiversity	<ul style="list-style-type: none"> <li>▪</li> </ul>	Section changed to reflect current LRMP tentative agreement.

AVB	Forestry
AW	JL
Logging	CPM
DJC	CP
NM	KW
TM	DM
BM	AT
MEJ	PNJ
OW	AM
GH	PS
RM	
VAULT	

File: 19710-30/TFL 33

March 6, 2000

Jeff Lipsett, R.P.F.  
Corporate Forestry Superintendent  
Federated Co-operatives Limited  
P. O. Box 70  
Canoe, British Columbia  
V0E 1K0

Dear Jeff Lipsett:

**Re: Draft Management Plan (MP) No. 8 – Tree Farm Licence (TFL) 33**

Your draft Management Plan No. 8, submitted under covering letter of December 22, 1999, has been reviewed by Ministry of Forests' and Ministry of Environment, Lands and Parks' staff. We have the following comments:



- 1.4 History. For Table 2, suggest a column showing the harvest hectares by year to provide a comparison with planting history. For 1996, the prorated AAC was 25 000 m<sup>3</sup>.
- 2. Inventories. The district had requested you to outline what criteria was used to develop your operability mapping submission, which was to include an indication of harvest method, as directed under condition number 3 in the chief forester's MP #7 approval letter of June 11, 1996. Pending your clarification, there will be no district manager approval.
- 3.2.5.1 Basic Silviculture. We concur with your MP that genetically improved spruce stock is, at this time, being planted on the TFL, and as other species become available, additional improved stock will be used. Please clarify in your proposed MP that the current seed availability is consistent with the modelling in your timber supply analysis.

Your statement on reforestation "...at least for the minimum number of well-spaced trees,..." creates some uncertainty whether Federated is intending to manage to target stocking levels. We request that you commit your management to target stocking levels or identify to what level you are managing.

- 3.2.7.1.2 Windthrow. For preventative measures, please add that “Silviculture prescriptions will incorporate assessments or windthrow risk in the design of appropriate silviculture systems and block layout”.
- 3.2.8.3 Road Deactivation. For the last sentence, the licensee must recognize road deactivation under the *Forest Practices Code Act*, is the licence holder’s responsibility.
- 3.3.1 Visual Quality Objectives. In your second paragraph “... to exceed the conventional (base-case) disturbance limits...”, we understand you are referring to the September 1997 LRMP proposed standards for VQOs, compared to the current standards of the 1995 Okanagan Timber Harvesting Guidelines. Until the Okanagan-Shuswap LRMP is approved and those VQOs implemented, or an interim policy of acceptance is developed, we accept your commitment to meet the current 1995 standards in your MP. We understand that all of your existing harvested areas within the TFL may not yet fully meet the current 1995 standards, nor the proposed LRMP VQO standards.

Within this section, you should make reference to your 3.2.1 “Silviculture Systems” which provide examples of systems in order to achieve VQOs and other various management strategies. In addition, please add any opportunities that Federated is prepared to undertake for visual “block rehabilitation” to improve visual appearances of existing blocks (particularly east of Cinnamousun Narrows) and for future harvesting developments.

- 3.3.4 Protection of Water Quality and Quantity. An inventory of both licenced and unlicenced water users within the TFL were to be provided as condition number 2 in the chief forester’s approval of MP #7. Please include the list in your proposed MP #8 submission and identify when they have been or will be included in your forest development plans for public input.
- 3.3.5 Cultural Heritage. Please add a reference to the AIA instruction letter from the district manager to licensees on February 28, 2000. First Nations have indicated they do not support the AOA model, but are supportive of the AIA instruction letter approach.
- 3.3.8 Fish and Wildlife Habitat. Your fish habitat classification (FHAP) and stream classification undertaken to date do not satisfy condition number 4 of the chief forester’s MP #7 approval letter. Please identify when a satisfactory update will be completed for the approval of the district manager.
- 3.3.9 Other Opportunities.
- #1 Issue: In the fourth line, replace “an opportunity exists...” with “A potential opportunity may be explored...”
- #3 Issue and Action: To date there are no standards to establish permanent sample plots for managed stands. You may instead consider monitoring managed stands for future opportunities.
4. Consultation and Integration of Harvesting Activities with Non-Timber Users. In the third paragraph, please identify the “MOF policy” as the “*Protection of Aboriginal*


*Rights Policy*”, and add that MOF will be invited to all consultation meetings. Please list the bands with an interest over TFL 33 and provide contact names under this paragraph.

5. Impact Summary – Key Similarities and Differences. In the second paragraph, you should provide specific examples of how the cut can remain the same “... due to more progressive use of VQO management...”, and include these in your 3.2.1 “Visual Quality Objectives” section.
6. Public Review Strategy for MP #9. You should delete this whole section as a review strategy is no longer required in accordance with the TFL replacement document (Schedule D), effective March 1, 2000.

Pertinent maps should accompany your proposed MP as outlined in Appendix VIII – example format (page 134) of the “TFL Management Plan Guidelines”.

We look forward to the above revisions within your proposed MP, which should include comments that you have already received from your public viewing and from other agencies. The proposed MP #8 package should be directed to the chief forester, with copies to region, district and MELP, Salmon Arm, no later than April 21, 2000. If you have any questions on the above, please contact Clark Roadhouse at (250) 828-4152.

Yours truly,



Fred A. Baxter  
Regional Manager  
Kamloops Forest Region

pc: Charlie Klasen, RTEB

Jeff Stone, Timber Supply Branch

Ron Beals, Paul Birzins, Matt Simons, Salmon Arm Forest District

Jeff Morgan, FES, MELP, Salmon Arm Forest District

Dan Peterson, Kamloops Forest Region