

## **Brimacombe, Don**

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**From:** Roadhouse, Clark FOR:EX[SMTP:Clark.Roadhouse@gems3.gov.bc.ca]  
**Sent:** Thursday, July 19, 2001 9:25 AM  
**To:** Brimacombe, Don  
**Cc:** Scharf, Marcy FOR:EX  
**Subject:** RE: TFL 35 MP 9 - Sec 1.3 History

We too are having difficulty retrieving the area withdrawal Instruments since inception of TFL 35. The Instruments can be retrieved, but the Exh 'A's describing the area of withdrawal cannot readily be obtained. On that basis, we will not require such 'history' for TFL 35 MP #9. I am still attempting to retrieve the Instrument 'history' withdrawals on TFL 15 for Sean since we have lots of time to search.

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

**From:** Brimacombe, Don [mailto:don.brimacombe@weyerhaeuser.com]  
**Sent:** Thursday, July 19, 2001 7:53 AM  
**To:** Roadhouse, Clark FOR:EX  
**Subject:** TFL 35 MP 9 - Sec 1.3 History

Clark,  
In regards to Section 1.3 of MP 9 and your request for a summary table of area withdrawls to TFL 35, Sean indicated that you were going to check with Victoria regarding this information. Have you had any luck in tracking down this information?

Thanks,

Don Brimacombe  
Forestry Supervisor  
Weyerhaeuser  
Kamloops Branch  
Phone: 250-828-7799

JUL 09 2001

*file - original*  
*Copy → KA - Don Brimacombe*  
*Sean*

File: 19710-30/TFL 35

July 3, 2001

Don Brimacombe, RPF  
Forestry Supervisor  
Weyerhaeuser Company Limited  
PO Box 800  
Kamloops, British Columbia  
V2C 5K3

Dear Don Brimacombe:

**Re: Draft Management Plan #9 for Tree Farm Licence (TFL) 35**

Ministry of Forests' and Ministry of Water, Land and Air Protection's staff have reviewed your draft Management Plan No. 9, submitted under covering letter of April 30, 2001. We have the following comments:



- 1.3 History. Please include a table describing the area withdrawals and alienations, by Instrument Number and by date that have occurred since the original issuance date of TFL 35.
- 3.11 Utilization specifications. You should specify in a table format the utilization standards, including d.s.h., stump height, top diameter, and minimum log length, by species. Refer to Schedule C - utilization specifications described in your current TFL document.
- 3.13 Proposed Harvest Level. From our perspective, your recommended harvest level does not provide the correct interpretation on the impact of landscape unit biodiversity being limited to no more than 4 percent within TFL 35 as proposed in your management plan. We interpret that the 4 percent covers the entire Kamloops LRMP area.
- 4.1 Visual Quality. You are requested to commit to completing a landscape inventory along the Jamieson Creek Road corridor prior to the information package stage of Management Plan No. 10 submission.
- 4.2 Biodiversity. As noted in 3.13 above, we differ in your interpretation of an impact of up to 4 percent over the TFL, compared to the whole LRMP area. The differing interpretation is also noted under Old Growth Management Areas of this section.

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• THE GOVERNMENT OF BRITISH COLUMBIA IS AN "EMPLOYMENT EQUITY EMPLOYER" •

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**Ministry of  
Forests**

Kamloops Regional Office

Mailing Address:  
515 Columbia Street  
Kamloops, BC V2C 2T7

Tel: (250) 828-4131  
Fax: (250) 828-4154

Coarse Woody Debris (CWD). Your first paragraph should refer to the short-term strategy on CWD management as provided regionally and provincially.

In the third paragraph, your approach is inconsistent with regional and provincial direction on CWD management.

The CWD requirements must be made within the benchmarks for waste billing, plus the utilization commitments made for TFL 35. In this respect, note that lodgepole pine specifications are 12.5-cm d.b.h., versus your bullet of "less than 17.5 cm. diameter". Further recruitment of CWD may also come from cull trees, over and above wildlife trees, etc.

- 4.3 Soils. Re: the fourth bullet wherein you're "...actively pursuing opportunities to reclaim portions of forest land..." you should add a commitment to further study expected productivity for 'within block road disturbances' during this MP, in conjunction with Graeme Hope, regional research pedologist (perhaps expand your landing productivity research noted under 13.0 Special Projects).
- 4.4 Water. Please add a bullet that Weyerhaeuser does commit to constraining disturbance within the Whitewood Creek watershed not to exceed 30 percent, as modelled in the analysis.
- Please add a bullet that Weyerhaeuser will consider using the new hydrological recovery values in their operations, once the information becomes available, which is expected this fall, 2001, and will be incorporated into MP #10.
- 4.7 Aboriginal Communication/Cultural Heritage Resources. Please include that Weyerhaeuser will follow the ministry's *Aboriginal Rights and Title Policy*. For the third bullet, in addition to your ("detailed AOA,...)", please add (AIS - archaeological inventory survey, and trail inventory).
- 8.7 Deciduous Species. Deciduous species should not normally be prescribed as part of the future crop; i.e., in the stocking standards.
- 8.10 Target, Minimum, and Maximum Stocking Standards. Within Appendix 5, the Minimum Free Growing Stocking Standard under Silviculture Standards appears to conflict with the last two columns under your next table 'TFL 35 MP #9 Stand Replacement Strategies'. Please clarify to which standard MP #9 has committed, and that it is consistent with the analysis for MP #9.
- 9.0 Roads and Bridges. In the last paragraph of page 35 after "...Forest Road Regulations", please delete "Forest Roads and Logging Trails Engineering Practices, Kamloops Region's Minimum Road Specifications and Conditions of Use". Please add *Engineering Guidebook* to this section.
- 9.3 Deactivation and Rehabilitation. Suggest this section be separated into two sections as each topic has different objectives. As noted in this section, "The intent of road deactivation...is to maintain water quality and to manage siltation from water flow." The intent of rehabilitation is to achieve the above, in addition it is "...to manage soil productivity".

- 10.0 Consultation with Other Resource Users. Suggest a separate section for consultation with First Nations. As noted in 4.7 above, you should refer to the ministry's *Aboriginal Rights and Title Policy*. As such, you should include that you will undertake open houses on the reserve, one-on-one meetings, and site visits. You may also wish to add that Weyerhaeuser will follow the protocol agreement with Skeetchestn Indian Band and continue with monthly communication meetings with the North Thompson Indian Band.
- 13.0 Special Projects. The TFL 35 TEM Enhancement/Upgrade revised data that was completed by the end of April 2001, could not be included in the current analysis for TFL 35 MP #9. We understand that the former data is an inferior TEM product that was utilized in the analysis due to the MP schedule. Accordingly, we request that the revised upgrade TEM data be submitted to this office prior to July 18, 2001 for ministry review.

Under paragraph 2.25 of TFL 35 document, topics within the following sub-paragraphs must be incorporated into your management plan, such as:

- b) sign and seal,
- c)(v) the guidelines referred to in clauses 2.08(a)(ii) - include under Appendix 1 of SMOOP, per my letter of June 23, 1999, and attach within Appendix 20 of the MP,
- i)(i) include your January 21, 2000 revision, and my February 15, 2000 acceptance of your SMOOP, and
- k) highlight the key similarities and differences between this MP #9 and MP #8.

We look forward to the above revisions within your proposed MP, which should also incorporate comments that you have already received from your public viewing and from other resource agencies. The proposed MP #9 package should be forwarded to the chief forester, with copies to the regional manager, district manager, and Ministry of Water, Land and Air Protection, Kamloops, no later than July 31, 2001. 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, Resource Tenures & Engineering Branch  
Graeme Hope, Kamloops Forest Region

Date typed: 2001/05/04 Date last saved: 2001/05/09 4:27 pm

File: 19710-30/TFL 35

May 9, 2001

Don Brimacombe, RPF  
Forestry Supervisor  
Weyerhaeuser Company Limited  
PO Box 800  
Kamloops, British Columbia  
V2C 5K3

Dear Don Brimacombe:

**Re: Draft Management Plan #9 for Tree Farm Licence 35**

Thank you for forwarding a copy of your draft management plan to this office, under your cover letter of April 30, 2001.

We plan to provide comments on your draft plan to you within the target timetable, before August 1, 2001.

Yours truly,



Clark Roadhouse  
Tenures Coordinator  
Kamloops Forest Region

pc: Charlie Klasen, Resource Tenures & Engineering Branch





Weyerhaeuser Company Limited  
1550 Mission Flats Road  
PO Box 40  
Kamloops, BC  
Canada V2C 5K3  
Tel (250) 828 7715  
Fax (250) 828 7592

April 30, 2001

Kamloops Forest District  
**Attention: Ken Baker, Acting Deputy Chief Forester**  
P.O. Box 9525 Stn. Prov. Gov't  
Victoria, BC V8W 9C3

**Re: TFL 35 - Draft Management Plan #9**

Dear Ken:

In accordance with the TFL 35 Licence Document, I hereby submit for your review and comment the Draft Management Plan #9 for TFL 35.

Should you wish to contact me regarding this plan, I can be reached at 250-828-7799.

Sincerely,

**WEYERHAEUSER COMPANY LIMITED**

Don Brimacombe, RPF  
Forestry Supervisor

DB/tm

**cc: Sean Curry; Weyerhaeuser Company Limited**



Weyerhaeuser Company Limited  
1550 Mission Flats Road  
PO Box 40  
Kamloops, BC  
Canada V2C 5K3  
Tel (250) 828 7715  
Fax (250) 828 7592

April 30, 2001

Kamloops Forest Region  
**Attention: Clark Roadhouse**  
515 Columbia Street  
Kamloops, BC V2C 2T7

**Re: TFL 35 - Draft Management Plan #9**

Dear Clark:

In accordance with the TFL 35 Licence Document, I hereby submit for your review and comment the Draft Management Plan #9 for TFL 35.

Should you wish to contact me regarding this plan, I can be reached at 250-828-7799.

Sincerely,

**WEYERHAEUSER COMPANY LIMITED**

Don Brimacombe, RPF  
Forestry Supervisor

DB/tm

**cc: Sean Curry; Weyerhaeuser Company Limited**



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1550 Mission Flats Road  
PO Box 40  
Kamloops, BC  
Canada V2C 5K3  
Tel (250) 828 7715  
Fax (250) 828 7592

April 30, 2001

Fisheries and Oceans  
**Attention: Tim Panko**  
c/o: Kamloops Office  
1278 Dalhousie Drive  
Kamloops, BC V2C 6G3

**Re: TFL 35 - Draft Management Plan #9**

Dear Tim:

In accordance with the TFL 35 Licence Document, I hereby submit for your review and comment the Draft Management Plan #9 for TFL 35.

Should you wish to contact me regarding this plan, I can be reached at 250-828-7799.

Sincerely,

**WEYERHAEUSER COMPANY LIMITED**

Don Brimacombe, RPF  
Forestry Supervisor

DB/tm

**cc: Sean Curry; Weyerhaeuser Company Limited**





Weyerhaeuser Company Limited  
1550 Mission Flats Road  
PO Box 40  
Kamloops, BC  
Canada V2C 5K3  
Tel (250) 828 7715  
Fax (250) 828 7592

April 30, 2001

Ministry of Environment Lands and Parks  
c/o Ministry of Forests  
**Attention: Phil Holman**  
1265 Dalhousie Drive  
Kamloops, BC V2C 5Z5

**Re: TFL 35 - Draft Management Plan #9**

Dear Phil:

In accordance with the TFL 35 Licence Document, I hereby submit for your review and comment the Draft Management Plan #9 for TFL 35.

Should you wish to contact me regarding this plan, I can be reached at 250-828-7799.

Sincerely,

**WEYERHAEUSER COMPANY LIMITED**

Don Brimacombe, RPF  
Forestry Supervisor

DB/tm

cc: Sean Curry; Weyerhaeuser Company Limited



Weyerhaeuser Company Limited  
1550 Mission Flats Road  
PO Box 40  
Kamloops, BC  
Canada V2C 5K3  
Tel (250) 828 7715  
Fax (250) 828 7592

April 30, 2001

District Manager  
Kamloops Forest District  
**Attention: Paul Tearoe**  
1265 Dalhousie Drive  
Kamloops, BC V2C 5Z5

**Re: TFL 35 - Draft Management Plan #9**

Dear Paul:

In accordance with the TFL 35 Licence Document, I hereby submit for your review and comment the Draft Management Plan #9 for TFL 35.

Should you wish to contact me regarding this plan, I can be reached at 250-828-7799.

Sincerely,

**WEYERHAEUSER COMPANY LIMITED**

Don Brimacombe, RPF  
Forestry Supervisor

DB/tm

cc: Sean Curry; Weyerhaeuser Company Limited