

Management Plan Review

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1.0 Summary of the Public Review of the Draft Management Plan

The following is a summary of the public review and results. A full report, including the specific comments received at the open houses and the written responses and replies, was submitted to the Manager of the Vancouver Forest Region in March 2002. The report is available on the Management Plan text CD.

1.1 Process

Prominent advertisements were placed in regional and local newspapers in order to advise the general public:

- that the draft MP #4 was available for review;
- of locations where a copy of the Draft MP #4 could be obtained;
- of the schedule and locations of open houses for review and discussion of MP #4.

The advertisements were placed in the following papers in late September and early October as shown.

BC Gazette	September 28, October 5
The Westerly News	September 26, October 3
The Bamfield Beacon	October 1
The Alberni Valley Times	September 28, October 5
The Nanaimo Daily News	September 28, October 5
The Cowichan Valley Citizen	September 26, October 3
The Victoria Times Colonist	September 28, October 5

Open houses, one-day events, were held at the following locations:

- | | |
|---|---|
| • Port Alberni Friendship Centre | Saturday, October 13 from 10:00—4:00 pm |
| • Bamfield Community Hall | Monday, October 15 from 3:00—9:00 pm |
| • Ucluelet/Tofino, Long Beach Golf Course | Tuesday, October 16 from 3:00—9:00 pm |
| • Duncan—BC Forest Discovery Centre | Wednesday, October 17 from 3:00—9:00 pm |
| • Nanaimo—Coast Bastion Inn | Thursday, October 18 from 3:00—9:00 pm |
| • Victoria—Executive House Hotel | Saturday, October 20 from 1:00—7:00 pm |

The open houses included posters and copies of the draft MP #4, both text and maps. Weyerhaeuser staff involved in local operations and in writing the draft MP were available for questions and discussion.

Copies of the draft Management Plan, a short newsletter and a survey form were made available to the general public between October 8, 2001 and December 7. Copies were available during normal working hours at the following locations:

- Weyerhaeuser offices:
 - West Island Timberlands – Planning Office, Port Alberni
 - Alberni Forest Information Centre
 - Nanaimo Woodlands, Nanaimo.

- Ministry of Forests offices at:
 - South Island Forest District, Port Alberni.
 - Vancouver Region Office, Nanaimo
 - Resource Tenures and Engineering Branch, Victoria

Copies of the advertisements, newsletter, questionnaire and public input received to-date were also sent to those on the mailing list for TFL 44.

Special invitations were sent to First Nations and Special Interest groups to meet with them for discussion of issues of special concern.

1.2 Results

Attendance at the six open houses totaled 84. Fifty-seven written responses were received. These include comments from individuals, from three First Nations and from representatives of special interest groups. A copy of each of the responses and the replies is included in the full report on the public review process

Presentations on the Management Plan were made to three groups. They include the City of Port Alberni, the Alberni-Clayoquot Regional District and the Clayoquot Sound Central Region Board.

The concerns and issues raised are varied. In summary they included:

- Requests for information, particularly at open houses. These included questions on timber supply, processing plants, tenure and variable retention.
- The main resource protection issues included Forest Ecosystem Networks (FENs) and old-growth. A number of respondents expressed concern about the expiry of FENs in 2003. Section 5.3 in the Management Plan will be expanded to further discuss the strategy for applying landscape unit planning and Variable Retention (VR) to meet the habitat and biodiversity objectives that were originally sought from FENs. It is noted that the Timber Harvesting Land Base (THLB) in MP #4 (in which FENs are not recognized in the base option) is very similar in area to the THLB in MP #3 (in which FENs are recognized). In total, approximately one-third of the productive forest is reserved.

A group of letters recommended classifying the Upper Walbran, Nahmint and Klanawa Watersheds as old-growth stewardship zones with no harvest activity. The Weyerhaeuser BC Coastal Group's target of 10% for old-growth zones applies across the Group's BC Coast tenures and not just to TFL 44. Small areas have been classified as old-growth zones in the Nahmint and Klanawa watersheds, and Special Management Zone classifications in the Nahmint and Upper Walbran provide additional emphasis on non-timber resources in these areas.

Interest was also expressed in riparian management areas, ungulate winter ranges and goshawks.

- Forest management questions and issues included silvicultural systems, rotation length, fertilization and windthrow.

The report on the timber supply analysis will include information on harvest ages and age-class distributions. We expect harvest ages in second-growth to vary substantially depending upon species, site productivity and management objectives. Some areas will be harvested at 40 to 50 years of age while other areas (for example in some visual landscapes) may not be harvested until they are 120 to 150 years of age or older. The average harvest age will probably be between 70 and 90 years.

Fertilization — for fertilization at time of planting we now ask our fertilizer suppliers for a statement that all components of the fertilizer exclude industrial wastes, hazardous waste products and are free of dioxins.

The results of surveys of windthrow during recent years will be added to Section 6.3.3. On average, windthrow has occurred on an area equivalent to 2.8% of the area harvested annually.

- Economic questions and concerns included jobs, value-added products, volumes available for local processors and log exports. The current focus is on improving the poor financial performance of Company operations in the Alberni Valley. This includes initiatives for improving worker safety, reducing costs and improving performance.

Weyerhaeuser has a track record of making logs available to local processors. Initiatives include working with other local companies to direct fibre to the most appropriate mill so that participants benefit from a more efficient use of the timber resource.

Most of the volume harvested in TFL 44 is processed locally or is offset by mill purchases as logs are traded to better suit mill requirements (refer to Section 4.1 in the Management Plan). The provision for log exports (given that the log surplus criteria are met) has been positive for TFL 44 during the difficult market conditions of the last few years. This has allowed the marketing of timber not needed in BC, hence allowing additional local economic activity (timber harvesting and management) to occur during these difficult times.

- Responses to comments and recommendations on planning issues included:
 - A statement will be added to the summary reinforcing Weyerhaeuser's commitment to implementing the Scientific Panel recommendations in the Clayoquot Sound portion of TFL 44.
 - The description of recreation areas in the map atlas terms of reference will be corrected in future map products.
 - A description of current planning priorities will be included in the section on landscape unit planning.

- A discussion of planning and Special Management Zones.
- Some groups were concerned that the new Management Plan schedule (followed in preparing MP #4) does not formally allow for public review of the Timber Supply Analysis and the Twenty-Year Plan. It was agreed that, upon completion of these analyses, a copy of the reports would be provided to the interested groups. Copies of review comments will be sent to the Vancouver Forest Region and to the Timber Supply Branch.
- Feedback was received from three First Nations groups. There were complaints that inadequate notification was provided of the review and time for review of the Management Plan. The notification and consultation process is described in Section 2 of this appendix. It was agreed that comments received up until May 31, 2002 would be responded to and provided to the Ministry of Forests. Other feedback focused mainly on First Nations involvement in planning, cultural heritage and environmental protection and business relationships. For detail refer to the full Public Review report.

Responses to most of the questions and issues raised occurred in one of four main ways:

- Information was provided as requested.
- The concern was communicated to operations for awareness and/or resolution at the local level.
- The concern is addressed by regulations, the management plan process and/or strategies described in the Management Plan.
- Changes to the Management Plan.

Specific changes to Management Plan #4 (resulting from the public review) include:

- A statement will be added to the summary reinforcing Weyerhaeuser's commitment to implementing the Scientific Panel recommendations in the Clayoquot Sound portion of TFL 44.
- A more complete description of government revenues will be provided in Section 4.1.
- A statement regarding First Nations access to cedar for cultural use will be added to Section 4.4.
- Section 5.3 will be expanded to further discuss the strategy for applying landscape unit planning and Variable Retention (VR) to meet the habitat and biodiversity objectives that were originally sought from FENs. In addition, the term "non-contributing" (areas that are already reserved from timber management) will be more clearly defined.

- An estimate of the additional impact (net-down area) of applying 100% net-downs in riparian management zones will be provided in the Timber Supply Analysis Report
- The results of recent windthrow surveys will be added to Section 6.3.3.
- Additional context including a description of the current priorities (old-growth retention and stand structures — wildlife tree reserves) of landscape unit planning will be added to Section 7.4.
- A statement will be added to the Information Package to clarify that the base option for the Timber Supply Analysis will portray the T'iitsk'in Paawats as an Old-growth Stewardship Zone with 100% net-down. The T'iitsk'in Paawats is an area to the west of Henderson Lake that is of particular interest to the Uchucklesaht First Nation.
- A wording change will be made to Appendix 3, Section 3 so that the sentence describing the Uchucklesaht Traditional Use Study will now read:

"Uchucklesaht — three phases of a government funded Traditional Use Study have been completed."

2.0 First Nations Review

The following is a record of the notification and information sharing with regards to Management Plan 4 for TFL 44.

October 17, 2000 – First Nations were introduced to the Management Plan at the beginning of the process at a meeting in Port Alberni. Most of the local First Nations were represented by their Forest Liaison who works closely with Weyerhaeuser representatives on numerous issues. This meeting outlined the purpose and schedule of the proposed Management Plan. A handout of the power-point presentation was also made available for further reference. At that time, the offer was made that our group would travel to the First Nations communities if invited. No request was received.

May 29, 2001 – Weyerhaeuser extended an invitation to the HUU-ay-aht and Uchucklesaht at a Resource Management Meeting (RMM) to have the authors of the Management Plan discuss it with any of the First Nations. The RMM was developed from the Interim Measures Extension Agreement with the purpose of discussing forest and resource management in the Ha'houlthee of the HUU-ay-aht and Uchucklesaht. The Ditidaht First Nation was also represented at this meeting.

September 27, 2001 – A letter was sent to each First Nation with traditional territory in TFL 44, describing the process for reviewing the Management Plan and extending an invitation to meet for discussion of specific issues and concerns. The letter also outlined the Management Plan review process and requested comments prior to December 15.

November 21, 2001 – The Management Plan was discussed at a meeting where all local First Nations with traditional territories within TFL 44 were represented. In response to requests at this meeting, additional copies of the MP were given to those who requested one.

November 27, 2001 – A reminder was sent to First Nations regarding the upcoming deadline for submission of comments.

January 23, 2002 – an e-mail was distributed informing First Nations that input on MP #4 could be received up until May 31, 2002.

August 02, 2002 – A CD including reports of the Timber Supply Analysis and the Twenty-year Plan and map data was sent to each First Nation with traditional territory in TFL 44. An invitation to meet and discuss the analyses was included.

Early September 2002 – The "Proposed" Management Plan #4 map and text CDs will be distributed to each First Nation with traditional territory in TFL 44.

The review of the Draft Management Plan resulted in three submissions — from the Tseshaht First Nation, the Uchucklesaht Tribe and a joint response from the Huu-ay-aht/Ditidaht First Nations.

These submissions and the corresponding company responses are documented as "responses" 23, 56 and 57 in Appendix 6 of the Public Review Report. They contributed to the Management Plan changes described in section 1.0 above.

Further comments were received from The Tseshaht and Huu-ay-aht/Ditidaht First Nations after completion of the Public Review Report. Refer to section 4 of this Appendix.

Concern has been expressed by First Nations groups regarding short-term and long-term access to red and yellow cedar, particularly old-growth for traditional and cultural uses. This issue was described by the Chief Forester in the AAC Rationale for TFL 44, MP #3 (January 1998).

A Cedar Access Task team was initiated in early 2002. The team includes representatives of the South Island Forest District -Ministry of Forests, the Huu-ay-aht and Uchucklesaht First Nations and Weyerhaeuser. Considerable progress has been made in meetings during the first half of 2002. The traditional and cultural uses of cedar have been discussed and summaries of the current inventory of cedar by age class and net-down classes (e.g. in riparian management areas, wildlife areas etc.) have been provided. A start has been made on discussing possible management strategies and a statement of commitment was drafted for inclusion in MP #4.

Next steps in this process include refining the information needed for establishing clear management strategies. This includes more clearly defining the needs and establishing a better match between the inventory and timber characteristics required for traditional and cultural uses.

3.0 Ministry of Forests Review

- Regional Manager's Review of Management Plan #3
- Regional Manager's Review of the Draft Management Plan #4

Correspondence specific to the Information Package, Timber Supply Analysis and the Twenty-Year Plan are included in Appendices I, VII and VIII respectively.

3.1 Regional Manager's Review of Management Plan #3



444 - 2 2001

File: 19710-30/TFL44

APR 27 2001

Peter Kofoed, R.P.F.
 Planning Forester
 Weyerhaeuser Company Limited
 Coastal Group
 65 Front Street
 Nanaimo, British Columbia
 V9R 5H9

Dear Peter Kofoed:

As part of the management planning process for Tree Farm Licence (TFL) 44, the Vancouver Forest Region has undertaken a review of:

- i) The management plan (MP) in effect under TFL 44, and
- ii) The performance of Weyerhaeuser Company Limited in respect of that MP.

Please find attached the results of this review, including direction for consideration in the development of MP 4.

For your information, the primary contacts from Resource Tenures and Engineering Branch, Timber Supply Branch, South Island Forest District, and Vancouver Forest Region for the TFL 44 MP process are Charlie Klasen, Bud Koch, Emma Neill, and Greg Gage, respectively. If you have any questions regarding this review, please contact Greg Gage, TFL Officer, at (250) 751-7268. I look forward to receipt of the draft MP 4 for TFL 44.

Yours truly,

Ken Collingwood
 Regional Manager
 Vancouver Forest Region



Page 1 of 2

• THE GOVERNMENT OF BRITISH COLUMBIA IS AN 'EMPLOYMENT EQUITY EMPLOYER'. •

Ministry of
 Forests

Vancouver Regional Office

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South Island Forest District

Connie Miller-Retzer, FES
South Island Forest District

Doug Morrison, Section Head
Ministry of Environment, Lands, and Parks, Nanaimo

Attachments (1)

Regional Manager TFL 44 MP 3 Review Comments and MP 4 Direction:

- 1) An objective of Management Plan 3 (MP 3) was for Weyerhaeuser (WY) to work with the MOF to maintain established recreational areas, including existing sites and trails. Ongoing assistance from WY in this regard is recognized. Due to ongoing government reductions to recreation funding and the large cost of maintaining recreational sites on TFL 44, it is suggested that WY consider assuming an increased share of the cost of managing existing recreation sites, up to the level of a 50/50 cost split with the MOF.
- 2) MP 3 committed to identifying new, significant recreation attractions in the course of inventory or developmental work and protect them. Ensure that MP 4 identifies how this commitment has been fulfilled with regards to the Blue Moon Cave.
- 3) Identify in MP 4 how WY has been co-operating with the MOF and caving organizations to protect cave entrances and underground cave features, and assisting in the management of public access.
- 4) It is understood that two options have been considered for completion of a recreation analysis. Identify in the timber supply analysis information package (TSAIP) which option has been chosen, when the analysis will be complete, and how the results will be incorporated into MP 4.
- 5) MP 3 committed to revising and updating the recreation inventory by December 31, 2000. It is understood that this work is ongoing. The recreation inventory that is currently being used was completed in 1995 and is presently being rolled over to the 1998 RIC approved standard for recreation resources. Be aware that the inventory will likely also need updating to reflect changes that have occurred since 1995, such as new features, activities, and changes to feature significance and sensitivity to resource development.
- 6) MP 3 committed to the preparation of a recreation plan for TFL 44 and the collection/collation, to MOF standards, of recreation use information. Identify in MP 4 how these commitments will be fulfilled. Consider that the Recreation Analysis may provide direction on the necessity of collecting recreation use information.
- 7) RMZ netdowns applied in the MP 3 analysis within the Nahmint watershed should be carried forward into MP 4, as is consistent with operational planning and guidance from both the District Manager, South Island Forest District, and the Nahmint Local Resource Use Plan.
- 8) Ensure MP 4 is consistent with the Vancouver Island Land Use Plan (VILUP) Higher Level Plan (HLP), which can be viewed at the internet address <http://www.for.gov.bc.ca/pab/news/vilup/final.pdf>

- 9) The twenty year plan for MP 4 is to include road projections to mapped cutblock boundaries.
- 10) Provide details in MP 4 on how WY maintains an active consultation process with First Nations Groups
- 11) MP 3 identified 17 community watersheds in TFL 44. In MP 4, list these. Additionally, list the watersheds for which a watershed assessment has been completed and summarize the management recommendations, including any ECA constraints for each assessment. Also identify for which watersheds operating guidelines may have been implemented that are incremental to the watershed assessment recommendations.
- 12) Pre-code Forest Ecosystem Networks (FENs) established on TFL 44 will expire June 15, 2003. The establishment of OGMAs and WTPS is scheduled to occur by July 2002, and are intended to serve the same objective as the grandparented FENS. Although the eventual areas which will contribute to OGMA targets may include some of the grandparented FEN area, the extent to which this may occur is unknown. To assist in the assessment of landscape unit planning options, include the FENs in a sensitivity analysis within the timber supply analysis.
- 13) Landscape unit Biodiversity Emphasis Options (BEOs) as initially acknowledged by the Chief Forester in the Vancouver Forest Region Landscape Unit Planning Strategy, and now contained in the approved Vancouver Island Land Use Plan (VILUP), are to be used in the timber supply analysis base case.
- 14) Ensure that there is sufficient detail in the timber supply analysis in MP 4 to compare the incremental harvest flow impacts of the Forest Project and VILUP BEOs.
- 15) MP 3 commits to the addressing of anomalies in the existing visual landscape database. Identify in the TSAIP, what progress has been made in this regard and what anomalies remain. Additionally, in the MP 4 identify what updating of the visual landscape inventories and VQO recommendations has occurred.

As discussed between yourself and my staff, the report, *Visual Impacts of Partial Cutting* (BC Ministry of Forests, 1997), should be reviewed to determine if the data on partial harvesting can be used in the timber supply analysis to more accurately model dispersed retention prescription areas.
- 16) In MP 4 identify what measures are employed to help ensure that timber not utilized is left distributed throughout the setting rather than at roadside.
- 17) Identify in MP 4 what measures have been taken to improve road signage for public and official access.

- 18) Beginning on page 46 of the document located at <http://www.for.gov.bc.ca/cpp/rmp/tsr/vancouver.pdf>, is a summary of issues identified from the previous AAC determination for TFL 44. Briefly summarize in a covering letter accompanying the submission of the draft MP 4, Weyerhaeuser's progress in addressing those action items identified to be wholly or partially a licensee responsibility and that remain relevant to TFL 44 subsequent to the creation of TFL 57.

3.2 Response to the Regional Manager's Review of Management Plan #3

The following response was included with submission of the draft MP #4 for TFL 44 to the Manager of the Vancouver Forest Region on September 28, 2001.

Response to Comments in Letter of April 27, 2001:

The comments and direction provided in your letter of April 27, 2001 have been considered and incorporated into the draft Management Plan (MP) #4 and the Information Package for TFL 44. The following points (numbered as in the April 27th letter) summarize the responses to your comments.

- 1) Our operations in TFL 44 have lost money during three of the last four years (1997-2000) and will post a financial loss again this year. We are continuing to work at and look for ways to turn this situation around. Until the financial situation is significantly improved, we are unable to assume an increased share of managing recreation sites. I will investigate the possibilities of using other (existing) funding sources and discuss this with the South Island Forest District Recreation Forester. Note that during the 1997 to 2000 period close to \$140 million was collected in stumpage and royalty payments from TFL 44.
- 2) Reference is made to the Blue Moon Cave in section 5.6 of the draft MP.
- 3) Protection of caves is included in the recreation strategies in section 5.6 of the draft MP.
- 4) Weyerhaeuser supported the South Island Forest District initiative for a combined Recreation Analysis with other licensees in the district. The proposal was not supported by other organizations. Hence we are undertaking a "TFL 44 Recreation Analysis" that will be completed by early 2002. The process includes consultation with the South Island Forest District Recreation Officer. This initiative is described in Section 8.5 (Recreation Inventories) in the draft MP.
- 5) It is understood that some updating of the recreation inventory (apart from the roll over to 1998 RIC standards) may be warranted during the next few years. A major revision is not expected during MP #4.
- 6) Section 8.5 in the draft MP describes our commitment to complete the Recreation Analysis (RAMs) report. This section notes that the RAMs report and other reviews may indicate the need for some updating in recreation information. Our cooperation with MoF initiatives to upgrade (roll over) the recreation inventory data to current standards is also expressed.
- 7) Net-downs specific to the Nahmint Watershed will be applied in MP #4. These include the "Nahmint Old-growth Reserve"

(Section 6.13 of the Timber Supply Analysis Information Package (TSAIP)) and specific riparian reserve and management zones (Section 6.14 of the TSAIP).

- 8) The Vancouver Island Land Use Plan (VILUP) Higher Level Plan (HLP) has been reviewed and incorporated into MP #4. Refer to section 7.3 in the draft MP.
- 9) The twenty-year plan for MP #4 will include road projections.
- 10) The consultation process with First Nations groups is described in section 4.4 of the draft MP.
- 11) With the transfer of much of the Clayoquot Working Circle to TFL 57 and the recent delisting of the Rogers Creek community watershed, there are now thirteen community watersheds in TFL 44. These are listed in section 5.1. The watersheds with a completed watershed assessment are also listed in section 5.1. Appendix VI summarizes the watershed assessment management recommendations including any Equivalent Clearcut Area (ECA) constraints as well as Weyerhaeuser's specific management strategies. West Island Timberlands has implemented rainfall shutdown guidelines for controlling sediment caused by road construction or logging activities. This additional guideline is referenced in some of the more recent watershed assessment reports in Appendix VI.
- 12) A sensitivity analysis that includes the Forest Ecosystem Networks (FENs) (i.e. excludes the FEN areas from the timber harvesting landbase) will be included in the timber supply analysis. Refer to section 3.2 in the TSAIP.
- 13) The landscape unit Biodiversity Emphasis Options (BEOs) will be used in the timber supply analysis base case. Refer to section 7.1 in the TSAIP.
- 14) The timber supply analysis will include an option that excludes the forest stewardship zones and variable retention. Comparison of this option with the base case will provide a measure of the timber supply impacts of the Forest Project. In a similar manner an option will exclude the old seral constraints and hence the timber supply impacts of these constraints may be estimated. Refer to sections 3.2 and 3.4 in the TSAIP.
- 15) The anomalies in the visual landscape data set have been addressed in the updated visual landscape inventory. Refer to section 8.6 in the draft MP and section 10.2.1.1 in the TSAIP

The report, *Visual Impacts of Partial Cutting* (BC Ministry of Forests, 1997) has been reviewed. The data primarily refers to prescriptions in which the partial cutting is evenly distributed throughout the cut-block. Most variable retention prescriptions include an uneven

distribution of retention with groups of retention and sometimes individual trees. It is expected that dispersed retention will occur on only a small percentage of the managed area. Hence the data from the 1997 report will not be applied in the analysis. It is understood that the Ministry of Forests is working on a similar study of variable retention areas – the resulting report will be of considerable interest.

- 16) Measures to help ensure that timber not utilized is left distributed throughout the setting rather than at roadside are described in section 6.1.2.2 of the draft MP.
- 17) The discussion part of section 5.6 in the MP describes measures that have been taken to improve road signage for public and official access.
- 18) The following items document progress in addressing issues identified in the TFL 44, MP #3 AAC determination:

Harvest Reporting: TFL 44 annual reports have included information on harvest volumes by species, by conventional, non-conventional and marginal operability classes and whether second-growth or mature (old-growth). Reporting on second-growth harvest by age commenced with the TFL 44 annual report for 1999.

Impacts of cultural heritage resources on the land base: West Island Timberlands has a GIS data set that includes 8,000 ha of proposed cutblocks that have been intensively surveyed for Culturally Modified Trees (CMTs). We have extracted this data set and will report our findings to Timber Supply Branch. Refer to section 6.20 in the TSAIP.

Visual Landscape Inventory Update: The TFL 44 visual landscape inventory has been updated (2000) to MoF 1997 standards. The Recommended Visual Quality Classes in this inventory have been combined with known scenic areas for use in the MP #4 analysis.

Recompilation of the Mature Timber Inventory: The mature inventory volumes in TFL 44 have been recompiled for use in the MP #4 analysis. This has included adding operational cruise information, excluding logged samples (to 1995) and using the latest Kozak 4.0 taper equations. Refer to section 5.1 in the TSAIP.

Coastal Watershed Assessment Procedures (CWAPs): CWAPs have been completed in cooperation with South Island Forest District staff. Refer to section 5.1 and Appendix VI in the draft MP.

Riparian Requirements: The stream classification that will be applied in the analysis is based on the classification prepared for and submitted with Forest Development Plans. This inventory is updated as operational inventories are completed for planned blocks. Refer to section 6.14 in the TSAIP.

Planning in Clayoquot Sound: Much of the Clayoquot Sound portion of TFL 44 has been transferred to TFL 57. For the 13,000 ha of TFL 44 in Clayoquot Sound, Weyerhaeuser remains committed to the Clayoquot Planning process. This includes working closely with the Clayoquot Sound Planning Committee and the Central Region Board to ensure that operations conform to the Scientific Panel recommendations.

Colluvial Areas: Acceptable reforestation strategies for these sites have been developed in conjunction with South Island Forest District staff. Most colluvial areas coincide with map polygons that are partially netted down for unstable terrain in the timber supply analysis. A project is currently underway to upgrade terrain stability mapping in TFL 44. This will provide further overview information on colluvial areas in parts of the TFL.

3.3 Regional Manager's Review of the Draft Management Plan #4



File: 19710-30/TFL 44

FEB - 1 2002

Peter J Kofoed, RPF
 Weyerhaeuser Company Ltd.
 B.C. Coastal Group
 65 Front Street
 Nanaimo, British Columbia
 V9R 5H9

Dear Peter Kofoed:

Thank you for your submission of the draft Management Plan No. 4 for TFL 44. Attached are review comments from Ministry of Forests' district, regional and branch staff, which must be considered in the development of the timber supply analysis, 20 year plan and proposed management plan.

If you have any questions, please contact Greg Gage, TFL Forester at (250) 751-7268.



Yours truly,


 Ken Collingwood
 Regional Manager
 Vancouver Forest Region

Enclosure

pc: Cindy Stern, District Manager, South Island Forest District
 Bud Koch, Senior Analyst, Timber Supply Branch
 Charlie Klasen, Timber Tenures Forester, Resource Tenures & Engineering Branch

Ministry of Forests	Vancouver Regional Office	Location: 2100 Labieux Road, Nanaimo	Mailing Address: 2100 Labieux Road, Nanaimo, BC V9T 8E9
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General

Wherever possible, the licensee response to RM draft MP review comments should be addressed through modifications to the MP, as opposed to a separate

cover letter to the Regional Manager. Using the latter approach alone would leave many issues unclarified for future users of the proposed MP.

Section 6.2 Establishing and Managing the New Forest

Reference is made in several sections to Forest Renewal BC funding. These references should be changed to read *Forest Renewal BC or other available government funding*, or a similar statement, since Forest Renewal BC will no longer exist in the new fiscal year.

Page 6 First Paragraph

"1988" in "An Ecological Rationale for..." should be 1998

Section 3.1.1 Retention and Variable Retention

In the guidelines for designing VR, included as an appendix, there is a lot of discussion around how to avoid stand level high grading. However, how does Weyerhaeuser plan to avoid forest level high grading, which can occur in tributary drainages that have been first pass harvested using clear-cutting with leave areas now proposed to be harvested using VR?

Section 5.2 Soil Conservation

A section on page 22 discusses roads and variable retention. This discussion does not appear to be supported by the current FDP. Variable retention proposals do show an increase in the amount of road. Second growth is being accessed more and more and will only increase over time. The management plan and the analysis need to consider an increase in site loss due to roads. The statement, "*Significant increases in roads are not expected on flatter terrain because of gains in reduced adjacency constraints*", needs some explanation, as it is not consistent with current FDP proposals.

Section 6.1.1.1 Analysis Procedure

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Because the requirement for a twenty year plan (TYP) is both legislated and in the licence, it is problematic to waive the requirements for such, as the draft MP proposes for the area outside of the Alberni East and Alberni West Working Circles.

The proposal for the deletion from TFL 44 of the Ucluelet Working Circle and transfer of the majority of the area to the Arrowsmith TSA has yet to be considered in detail and accepted by all pertinent statutory decision makers. Until such occurs, a TYP is required for the UWC area for MP No. 4.

For area within the Clayoquot Plan Area of the Vancouver Island Summary Land Use Plan, the TYP is to be developed within the bounds of the recommendations of the Clayoquot Sound Scientific Panel (CSSP). This may restrict cutblock and road projection to areas with a completed watershed plan, and limit harvest

projections to tabular summaries by watershed for the balance of the forecast harvest areas.

Section 6.1.2.4 Second-Growth Harvest Strategy

Explain further how "...increased focus on second-growth harvest..." will reduce "...the costs of transition to the spatial forest pattern implied by recent regulations."

Section 6.1.2.4 Second-Growth Harvest Strategy

Including age class will increase the utility of the second growth harvest volume reporting.

Section 6.2.1 Silvicultural Objectives

2nd bullet

Reference is made to "*silviculture characteristics and economic values*". It is recommended that *non-timber values (biodiversity, wildlife habitat, etc.)* be included in the points to be considered when determining appropriate species for regeneration.

Section 6.2.4 Basic Silviculture Regeneration Methods

The draft plan states "... *with an emphasis on prompt, high density stocking.*" While the "Species and Stock Selections" section makes reference to species selection being consistent with the Establishment to Free Growing Guidebook, this section does not. The plan does not appear to describe what "high density stocking" means in terms of potential variation from the guidebook recommendations. Therefore, it is recommended that either a reference be made in the Regeneration Methods section to the effect that densities will be in accordance with the Establishment to Free Growing Guidebook, or an explanation or table be included describing what Weyerhaeuser considers to be "high density stocking", how they vary from the Guidebook, and the rationale behind the variation.

Section 6.2.4

It is stated that deciduous is an acceptable species on certain sites. This needs to be clarified, simply using deciduous is too vague. Does Weyerhaeuser intend to manage for commercial objectives any deciduous species besides alder?

Section 6.3.4 Browse damage to seedlings:

Page 49

The MP presently reads: "Less palatable species will be planted where appropriate in areas that are highly susceptible to browse. Protective measures will be used where necessary". This is insufficient. Planting less palatable species should only occur if "red book" indicates the particular species is suitable

to the site. In areas of high browse hazard red cedar and yellow cypress seedlings require protection. Weyerhaeuser also needs to specify what protection measures they will employ.

Section 6.3.2.1 Forest Insect and Disease Control - Detection

By what means and with what frequency will "Forestlands be assessed on an ongoing basis to identify potential pest problems"?

Section 6.3.3 Wind Damage

MoF staff have observed the practice of variable retention harvesting within leave strips between clear-cut areas becoming more common in the TFL, resulting in increased wind-throw. How will this issue be addressed? Is Weyerhaeuser's monitoring program sufficiently detailed to provide data on this application of variable retention?

The statement is made that WCL will attempt to recover 30% of operationally induced windthrow. How is operationally induced windthrow being defined? What about windthrow that is not the result of operations? Why is this distinction being made?

Weyerhaeuser may wish to more clearly qualify their windthrow recovery objectives with economic considerations.

Section 7.2 Higher Level Plans — Last Paragraph

The first sentence requires restructuring.

Page 51 — penultimate paragraph — "landscape units" should be singular.

Page 53 — first paragraph — "Planing" should be "Planning".

Page 53 — second paragraph — "it" should be "its", also should "present" be "presented"?

Section 8.5 Recreation and Appendix 11 4.0 (Recreation and Visual Landscape Inventories)

Reference is made to the unsuccessful attempt to convert or rollover the existing 1995 recreation inventory (1991 standard) to the new MOF 1998 standard. In point of fact, the rollover project was not completed in time for the converted data (rollover) to be included in the Information Package for the Timber Supply Analysis. The rollover for TFL 44 recreation inventory has now been completed and incorporated in the SIFD recreation inventory. The data now requires thorough review by the ministry and licensee to determine whether there are any information gaps or significant errors and to incorporate new changes to the existing inventory. Therefore, it is recommended that the licensee make a firm commitment to review the converted recreation inventory in MP # 4, in conjunction with ministry staff, and to undertake a revision or updating of the

recreation inventory to the new RIC standard if it is determined there is a need to upgrade the existing inventory information/data base.

Appendix I, Timber Supply Analysis Information Package

Page 10

Non-productive stands are defined as those with less than 211m³/ha. How was this number arrived at?

Physically inoperable timber includes areas that are defined as too rocky, a more in-depth explanation of “too rocky” is needed, perhaps some actual examples.

Appendix IV Sec 1.0 A: Planting and Natural Regeneration Guidelines for Sitka Spruce, Low Hazard Zone

Reference is made to “Site Diagnosis, Tree Species Selection and Slashburning Guidelines for the Vancouver Forest Region, Land Management Handbook NO. 8 (Green et al. 1984)” This reference is outdated. Reference should now be made to A Field Guide for Site Identification and Interpretation for the Vancouver Forest Region, Land Management Handbook NO. 28 (Green and Klinka 1994)”.

Miscellaneous

Ensure the proposed management plan is signed and sealed by a Registered Professional Forester, and signed by the licensee or authorized representative.

3.4 Response to the Regional Manager's Review Comments on the Draft MP #4

Typos identified on pages 6, 51 and 53 have been corrected.

References to Forest Renewal BC have been changed to reflect the new funding arrangements.

Section 3.1.1 Retention and Variable Retention

Concerns regarding high-grading in leave areas are discussed in section 5 of the "Guidelines for Designing Variable Retention — Layout and Silviculture Prescriptions", included as a file on the Management Plan text CD.

The discussion includes the market values of residual species and planning layout that allows a later economic harvest entry.

Annual checks of variable retention blocks are conducted to monitor performance and identify areas for improvement. High-grading is one of the issues examined during these assessments. A statement on this has been added to section 6.1.2.2.

Section 5.2 Soil Conservation

Some changes have been made to the section that discusses roads and variable retention. The following sentence has been included for clarification. "The average density of roads per unit of gross area is not expected to increase because of variable retention".

Section 6.1.1.1 Analysis Procedure

Page 28

Twenty-year Plans have been completed for the Ucluelet and Clayoquot Working Circles – as well as for the Alberni East / West area.

Section 6.1.2.4 Second-Growth Harvest Strategy

Second-growth harvest opportunities can provide a greater spatial distribution to harvest activity and hence diminish the negative impacts of spatial constraints on harvest volumes, particularly during the transition period. Similar comments have been added to this section.

Section 6.1.2.4 Second-Growth Harvest Strategy

The commitment for the annual report has been changed to include second-growth harvest volumes by age class.

Section 6.2.1 Silvicultural Objectives

2nd bullet

Non-timber values have been added to the considerations when determining appropriate species for regeneration.

Section 6.2.4 Basic Silviculture Regeneration Methods

The wording has been changed from “high density stocking” to “stocking standards that are consistent with the Free Growing Guidebook for the Vancouver Forest Region”.

Section 6.2.4

A reference has been added regarding the hardwood strategy under development and it is noted that the strategy is focused on red alder. Broad-leaf maple is another possible candidate hardwood species for some sites. Such considerations will be covered in the proposed strategy.

Section 6.3.4 Browse damage to seedlings:

Page 49

The text has been changed to reference the “Establishment to Free Growing Guidebook Vancouver Forest Region” and current approaches for seedling protection are briefly described.

Section 6.3.2.1 Forest Insect and Disease Control - Detection

A description of surveys for monitoring potential pest problems has been added.

Section 6.3.3 Wind Damage

Additions to this section include a note on the development of a monitoring program for windthrow, a definition of operationally induced windthrow and a reference to economic considerations in recovery of damaged timber.

Section 8.5 Recreation and Appendix 11 4.0 (Recreation and Visual Landscape Inventories)

Changes to this section include a commitment to review the converted recreation inventory data and to then proceed with agreed upon revisions or updating that results from this review.

Appendix I, Timber Supply Analysis Information Package

Page 10

The less than 211 m³/ha definition for non-productive stands corresponds to the “cut-off” of 3,000 ft³/acre used in the 1970s inventory of TFL 44. A similar comment has been added to this section.

The classification of physical operability relies on professional judgment. Of prime concern is safety for workers and recovery of timber.

The "too rocky" definition often corresponds with steep areas. In some situations it relates more to a high probability of significant breakage. The classification of some areas could change with changes in logging technology — for example with single-tree extraction by helicopter.

Appendix IV Sec 1.0 A: Planting and Natural Regeneration Guidelines for Sitka Spruce, Low Hazard Zone

The reference was updated as suggested.

Miscellaneous

The proposed management plan has been signed and sealed by a Registered Professional Forester, and signed by an authorized representative of the licensee.

4.0 Additional Recent Feedback

Three additional written responses were received after preparation of the Public Review Report (section 1 of this Appendix). All three were additional inquiries and comments from participants in the formal public review of the Draft Management Plan. Copies of these responses and corresponding replies from Weyerhaeuser have been sent to the Deputy Chief Forester and the Regional Manager of the Vancouver Forest Region. A copy is also included on the Management Plan text CD.

One of the letters involved concerns regarding operational plans in an area outside TFL 44. The reply responded to some of these concerns and provided contacts at the operation to facilitate a more direct and useful conversation.

The other two letters were from First Nations. The concerns in the letter from the Tseshaht First Nation were mainly related to the Forest Development Plan and other operational issues. Information was provided and contacts with operational people were recommended.

A reply has been sent to a joint submission from the Huu-ay-aht and Ditidaht First Nations, responding to most of their issues and comments. This included discussions of the approach used to allow for cultural heritage sites in the analysis, the strategy for harvesting second-growth, the direction provided for establishing Old-Growth Management Areas (OGMAs) and our commitment to jointly developing strategies for a future supply of Cedar for First Nations' traditional and cultural use (a statement has been added to the Management Plan on this issue). An update on the management plan schedule was provided. Copies of the Timber Supply Analysis and Twenty-Year Plan reports have been sent to all First Nations with traditional territories in TFL 44. It was emphasized that the Twenty-year Plan is not an operational plan and that the FDP should be referred to for details such as specific harvest block locations.

5.0 Other Changes to MP #4

Other changes to the Management Plan, largely, reflect updates for analyses that have been completed and other changes that have occurred since submission of the draft management plan in September 2001. These include:

- Additions to Section 6.1.1—Analysis and Allowable Cut and Section 9.0—Summary of Changes and Impacts
- Additions of:
 - Appendix VII – Timber Supply Analysis
 - Appendix VII – Twenty-Year Plan
 - Appendix IX – Management Plan Review
- A revised Appendix I – Information Package
- Updating of Appendix III – Relationships with First Nations
- Updating various statistics and programs to include 2001.
- Recognizing the change in government funding from Forest Renewal BC (FRBC) to the Forest Investment Account (FIA)