

**APPENDIX 16: AGENCY, PUBLIC AND STAKEHOLDER COMMENTS AND MEASURES TO ADDRESS**

<b>Agency interest group or person</b>	<b>Date of Contact</b>	<b>Comment (C) , question (Q) and how addressed (A)</b>
Regional Manager's Review Letter	November 22, 2002	<p align="center"><b>AAC Rationale Issues and Concerns</b></p> <p>Q. "It is my understanding that this inventory has been completed. Please advise us as to how you will be incorporating these results into your timber supply analysis."</p> <p>A. Discussions with MSRM Regional and Branch staff and MoF Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis culminated in acceptance of VRI Phase II modifications, Phase I plots and volume adjustment for use in MP9</p>
		<p>Q. "Please supply us with a copy of your Mistletoe management strategy and the effect of any additional information on the OAF's."</p> <p>A. Discussions with MoF District, Regional and Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis culminated in acceptance of strategy and modification of OAF's</p>
		<p>Q. "Please supply us with changes in the assumptions as they apply to the timber supply analysis." Refers to minimum operability levels.</p> <p>A. Discussions with MoF District, Regional and Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis culminated in acceptance of minimum operability levels</p>
		<p>Q. "Please advise us of the modeling assumptions that will apply to the timber supply analysis." Refers to more accurate accounting of NSR areas.</p> <p>A. Resurveyed NSR areas using new multi-layered survey procedures and reclassified areas as stocked or requiring fill planting. Inventory modified accordingly and incorporated into Information Package. Backlog areas planted. Discussions with MoF District and Timber Supply Branch Staff during Information Package development culminated in acceptance.</p>
		<p>Q. "Please supply us with a copy of the access management strategy for sheep habitat area</p>

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		that has been developed for TFL15.” A. Discussions with MoF Regional Staff July 8 <sup>th</sup> 2003 and February 4 <sup>th</sup> 2004 clarified role of access management plan. MP8 commitment was to cooperate with MELP on the development of an access management plan. With the introduction of the Forest Practices Code and related regulations, and Okanagan Shuswap LRMP and access processes regarding sheep, this was no longer relevant
		C. “Please incorporate any information from the inventory and mapping in MP9.” Refers to refined wildlife inventory mapping. A. Incorporated Okanagan Shuswap LRMP wildlife management zones and related cover, disturbance objectives. Discussed with MoF District, Regional and Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis
		C. “The application of the riparian management objectives from the OSLRMP should adequately address this issue.” Refers to refining RMZ objectives. A. Incorporated Okanagan Shuswap LRMP RMZ criteria. Discussed with MoF District, Regional and Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis
		<b>MP8 Commitments and Concerns</b>
		Q. “Please supply us with a summary of the harvest profiles by inventory type group and stocking class since the AAC determination of July 29, 1999.” A. Appendix 2 of the information package shows the stocking class 4 areas harvested since July 29, 1999 and the current stocking class 4 areas in the 2002 FDP.
		Q. “Please supply us with a complete list of all planting projects since the implementation of MP8 and indicate the genetically improved stock that was used.” A. Appendix 13 of the information package contains the information
		C. “There is a need to provide a more in-depth study to support the reduced OAF1.” A. Revised OAF’s were included in the information package and accepted by MoF Timber

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		Supply Branch Staff
		C. "Backlog NSR." Refers to more accurate modeling and reporting A. Resurveyed NSR areas using new multi-layered survey procedures and reclassified areas as stocked or requiring fill planting. Inventory modified accordingly and incorporated into Information Package. Backlog areas planted. Report sent to Forest Practices Branch June 2, 2003. Copy forwarded to Clark Roadhouse February 2004
		C. "Wildlife Habitat and refining of mapping." Refers to Wildlife Habitat Atlas Project A. Incorporated Okanagan Shuswap LRMP wildlife management zones and related cover, disturbance objectives. Actively working with Whiteheaded Woodpecker Recovery team.
		C. "Develop a more refined method to account for lower stump heights." A. Annual waste and residue surveys not modified to measure lower stump heights. 30cm stump height used to model PL leading yield curves inadvertently.
		C. "Further refinement of estimates on site productivity estimates of Lodgepole pine and other species is required." A. Site index adjustments using BEC Classification on TFL15, Final Report 2000, included as Appendix 4 in Information Package
Al Dean: public review of Draft MP & Information Package	March 31 <sup>st</sup> to April 11 <sup>th</sup>	C. "Favours using density to manage branch size and taper rather than pruning." Q. "Wanted information on how Weyerhaeuser was managing for connectivity. Wants to see more emphasis on connectivity. Would like to see more unburned piles and loose windrows." A. Discussed wildlife connectivity efforts through OGMA's, Enhanced Riparian Reserves, and WTP's. Explained LRMP direction regarding coarse woody debris and link to Weyerhaeuser practices
Regional Manager's Review Letter of	June 26, 2003	<b>General Comments</b>
		C. "Overall the draft MP did not address the points raised in my letter of November 28, 2002 and did not meet the content requirement described in paragraph 2.09 of TFL15. The Draft

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Draft MP		<p>MP lacked sufficient information to permit resource agencies to carryout critical and constructive comment of the draft MP.”</p> <p>A. Meeting on July 8<sup>th</sup> and follow-up email of July 21 with Regional staff. Discussed linkage of Information Package to MP and that most of the missing content was contained in IP. Discussed the timing of document submission Timber Supply Analysis and draft MP, and poor information linkages due to one document that is prepared much later, but some information being required in the previous. Differed in interpretation on content requirement for draft MP. Included relevant sections in Proposed MP.</p>
		<p>C. “All silviculture Prescriptions should be described as site plans.”</p> <p>A. Included paragraph in PMP stating that FDP’s, FSP’s, silviculture prescriptions and site plans will be referred to as operational plans, due to dynamic state of legislation.</p>
		<p>C. “Change references to Small Business Forest Enterprise Program to BC Timber Sales.”</p> <p>A. Done.</p>
		<b>Specific Comments</b>
		<p>C. “Title Page, incorrectly identifying the TFL as the Vaseux.”</p> <p>A. Changed title to Inkaneep.</p>
		<p>C. “Draft MP does not include necessary appendices or maps to provide supporting evidence regarding practices.”</p> <p>A. Maps are included in proposed MP.</p>
		<p>C. “Executive summary wording not clear regarding Chief Forester’s legal obligations.”</p> <p>A. Removed executive summary.</p>
		<p>C. “Page 1 Introduction. Incorrect references to enabling legal framework regarding MP preparation.”</p> <p>A. Changed Introduction to reference the correct clauses in TFL licence document.</p>
		<p>C. “Page 2, description of TFL, request for listing of BEC variants within TFL15.”</p>

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		A. BEC variants added to Page 2&3 description.
		C. "Page 2 History should include listing of Area Instruments showing changes to the TFL since inception." A. History section modified to include Table 23 from the Information Package. Information was copied from page 4 "Total Area" of the Information Package regarding area changes between MP8 and MP9. Appendix 3 was added and contains a copy of the area Instruments since TFL15 inception.
		C. "Specific references from the Regional Manager letter of July 29, 1999 should be included in MP." A. Details on how the specifics have been addressed are described above.
		C. "Forest Certification references and references to external documents shouldn't be included as they would inadvertently be approved by the Chief Forester when the MP is approved." A. References to these documents have been modified to include "for information purposes..."
		C. "Further clarification on the time horizon you wish to sustain the AAC." A. All references to the proposed AAC have been modified to include "as long as possible."
		C. "Planning. Provide a listing of approved and proposed higher level plans..." A. Table 4 from the Information Package copied in to the Resource Inventory section of the proposed MP."
		C. "Resource Inventories. Provide a listing of inventories undertaken and how these will be incorporated into the proposed MP." A. Table 4 from the Information Package copied in to the Resource Inventory section of the proposed MP." Details regarding how new inventories are being used are included in both the Information Package and Timber Supply Analysis documents.
		C. "Information from the Wildlife Habitat Atlas Project should be included." A. Incorporated Okanagan Shuswap LRMP wildlife management zones and related cover,

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		disturbance objectives. Actively working with Whiteheaded Woodpecker Recovery team.
		C. "Management and utilization of the timber resource, request to make reference to appropriate legislation." A. Added paragraph "Current Forest Policy Changes" on page 1 of proposed MP outlining why specific references are not made, but addressed under a more general clause "Acts and Regulations."
		C. "Table1. Management Objectives... and the time horizon you wish to sustain the AAC." A. All references to the proposed AAC have been modified to include "as long as possible."
		C. "Page 4. OAF's require substantial proof to justify a number different than 15%." A. Discussions with MoF District, Regional and Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis culminated in acceptance of OAF's different than the Provincial default.
		C. "Page 6. Harvest priority and minimum operability levels and relation to operational practice. The four harvest priority bullets will require prioritization." A. Page 8 and 9 of the Timber Supply Analysis describe how the minimum operability criteria were derived and also describe the harvest flow objectives. Timber Supply Branch Staff have accepted the data in the Information Package and Timber Supply Analysis. Page 8 of Proposed MP modified to remove reference to "not in priority" and commitment added to manage harvest profile to be within non-recoverable losses as stated in the Information Package.
		C. Page 6. Utilization of Stocking Class 4. "Please supply us with a summary of the harvest profiles by inventory type group and stocking class since the AAC determination of July 29, 1999." A. Appendix 2 of the information package shows the stocking class 4 areas harvested since July 29, 1999 and the current stocking class 4 areas in the 2002 FDP.
		C. Page 6. Minor Salvage. "I will require a stronger commitment to undertake small-scale

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		salvage operations in TFL15 in the proposed MP." A. Changes made to small scale-scale salvage program, committing Weyerhaeuser to manage the program in accordance with the "Acts and Regulations."
		C. Page 6. Deciduous Stands. "Clarify role of Deciduous in proposed MP and ensure this is included in the timber supply analysis." A. Details outlined on page 10 and 19 in the Information Package, and the Aspen strategy is included in Appendix 8."
		C. Page 6. Potentially Unstable Slopes. Refers to the use of terrain stability mapping in proposed MP A. Details outlined on page 9 of proposed MP
		C. Page 7. Cutting Permit Development. Refers to the reporting of waste and residue upon expiry of cutting permits A. Details outlined on page 9 of proposed MP
		C. Page 8. Proposed harvest level. Refers to the time horizon associated with the AAC A. Time horizon included
		C. Page 8. Integration with TSBC. General statement regarding Bill 28. A. No response needed
		C. Page 9. Wildlife tree patches. Need to stipulate the amount of area for future WTP's A. Details outlined on page 12 & 13 of Information Package and on page 13 of proposed MP
		C. Page 10. Soils. Expand section to address Terrain class V A. Details outlined on page 11 of Information Package and on page 14 of proposed MP
		C. Page 12. Range. Expand section to address noxious weeds A. Done in Proposed MP
		C. Page 12. Fish and Wildlife Habitat and access management A. Discussions with MoF Regional Staff July 8 <sup>th</sup> 2003 and February 4 <sup>th</sup> 2004 clarified role of access management plan. MP8 commitment was to cooperate with MELP on the

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		development of an access management plan. With the introduction of the Forest Practices Code and related regulations, and Okanagan Shuswap LRMP and access processes regarding sheep, this was no longer relevant
		<p>C. Page 13. Aboriginal Communities/Cultural Heritage Resources. "Describe how information is used, list First Nations who have an interest in TFL15, describe how Weyerhaeuser may accommodate First Nations interests, and describe practices to protect cultural heritage resources."</p> <p>A. Discussions with MoF Regional Staff July 8<sup>th</sup> 2003 and February 4<sup>th</sup> 2004, and with the MoF District First Nations Liaison officer October 9, 2003 and clarified how information is used, which First Nations have an interest and how we protect cultural resources. Wording revised in proposed MP to help clarify. Accommodation is a responsibility of the Government of BC, and business relationships with any First Nations Band are confidential and not part of the Management Planning process.</p>
		<p>C. Page 15. Integration of harvesting activities... Provide list of licensed tenure holders</p> <p>A. Appendix 15 contains list</p>
		<p>C. Page 15. Forest Health. Include copies of forest health strategies to proposed MP</p> <p>A. Included as Appendix 12</p>
		<p>C. Page 15. Mining and Exploration. Clarification regarding mineral tenures</p> <p>A. Done</p>
		<p>C. Page 15. Reforestation method. Describe impact of regeneration strategies in timber supply and MP</p> <p>A. Discussed with MoF Timber Supply Branch Staff during Information Package development and application in Timber Supply Analysis, culminating in acceptance of both</p>
		<p>C. Page 19. Backlog NSR. Refers to more accurate modeling and reporting</p> <p>A. Resurveyed NSR areas using new multi-layered survey procedures and reclassified areas as stocked or requiring fill planting. Inventory modified accordingly and incorporated into</p>

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		Information Package. Backlog areas planted. Report sent to Forest Practices Branch June 2, 2003. Copy forwarded to Clark Roadhouse February 2004
		C. Page 19. Stand monitoring. A. Section removed
		C. Page 20. Stand tending. More details required A. No changes in proposed MP. Details regarding juvenile spacing of lodgepole pine included in appendix 2 of Timber Supply Analysis
		C. Page 22. Public review. More details required A. Proposed MP refers to specific section in licence document that outlines public review process
		C. Page 22. Revision. A. Section removed
		C. Page 22 Key differences ... More details required A. Section modified in proposed MP
		C. Impact summary of MP Implementation More details required A. Licence holder section on page 4 expanded in proposed MP. Details regarding jobs, economic impact, and contractor force will not be provided given the significant changes in forest policy.
		C. Schedule B prorate needs to be included A. Section added in proposed MP
		C. Map folio required A. Maps in proposed MP
Grant Furness, WALP Penticton	October 8, 2003	C. Concern that Provincial WTP policy was not followed in the development of future WTP allowances. A. Future WTP allowances were calculated using the direction in Appendix 3, page 95 of the LUPG.

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		<p>C. Concern that a 3/3 old growth sensitivity analysis be tested, to provide additional information regarding impacts to long-term timber supply.</p> <p>A. Followed direction in LRMP regarding total OGMA area. Used actual placement in analysis. TSR is not a planning process, it is a decision making process. The impact of additional OGMA's could be interpreted using the +/-10% landbase sensitivity.</p>
		<p>C. Concern that the Provincial 1% IWMS timber supply impact limit was not automatically deducted from the timber supply analysis.</p> <p>A. There are no WHA's on TFL15. The proposed MP recognizes this asn commits to working with WALP in the identification of WHA's and following GWM's once established. TSR is not a planning process, it is a decision making process. The impact of the 1% IWMS could be interpreted using the +/-10% landbase sensitivity.</p>
		<p>C. Concern that how the Mule Deer winter range was incorporated into the timber supply analysis is optimistic, and that not enough thlb was set aside to meet cover constraints.</p> <p>A. The modeling process was changed and each planning cell was assessed for its nthlb contribution to the cover targets. When the 50% nthlb contribution could not be met, additional thlb was constrained to ensure that the cell constraints were achieved.</p>