

Appendix 6 - Agency and Public Review

Included as part of August 31, 2000 submission



File: 19710-30/TFL 14

July 31, 2000

D. E. Rounsville,
Chief Forester
Crestbrook Forest Industries Ltd.
PO Box 4600
Cranbrook, British Columbia
V1C 4J7

Dear D. E. Rounsville:

RE: Draft Management Plan (MP) #8 For TFL 14

Your submission dated May 30, 2000 of the draft MP has been reviewed and we provide the following comments for your consideration in finalizing that plan. Comments are referenced to the relevant sections of the plan:



Title Page – we expect the term of the MP will be 5 years, i.e. to November 30, 2005.

2.3.1 Ownership – While there are no indications from BC Hydro of imminent plans for use of the logged ROW, BC Hydro has indicated that they want to retain the notation of interest on these lands.

2.3.8 Landscape – Suggest adding “scenic area as made Known by District Manager” to first sentence, pg. 7.

3.1 Management and Utilization of the Timber Resource – There should be a recognition of the influence of forest health factors.

3.1.3 Partitions – The context of this section is incorrect. It should refer to suggested partitioning of the AAC into such forest types as deciduous or problem forests, in addition to a coniferous partition. If no partitioning is proposed, then this section is not applicable.

3.1.4 Proposed AAC – First sentence should read “...allowable annual cut (AAC)...”. The third sentence should read “Through *the term of* MP #8 an AAC of...”.

Page 1 of 3

• THE GOVERNMENT OF BRITISH COLUMBIA IS AN “EMPLOYMENT EQUITY EMPLOYER” •

Ministry of
Forests

Nelson Forest Region

Address:
518 Lake Street
Nelson, BC V1L 4C6

Tel: (250) 354-6200
Fax: (250) 354-6250

3.2.1 Visual quality – A minor point, the current vocabulary in visual landscape management uses the wording “visual landscape design” rather than “cut block size, configuration, and block reserves...”

3.2.5 Recreation resources – This section should be clearer. What this section should discuss or commit to is the following:

- consideration and incorporation of recreation values into forest management activities
- allowing and facilitating public use of the TFL for both facility based (campsites & trails) and non facility (hunting, dispersed camping, snowmobiling) recreation
- providing and maintaining recreation facilities (campsites & trails) at popular locations for public use
- managing for public use on the TFL by maintaining a recreation and landscape inventory, participating in the planning processes, etc.

3.2.8 Fish and Wildlife Habitat – The second to last sentence “To incorporate (rather than “recognize”) natural entities such as disturbance patterns INTO planning... and in last sentence, we are unsure as to what is meant by “To promote? “.

3.3.1 Non Timber Resources – This section needs to be clarified i.e. - “To explore (?) managing of non timber resources” is mentioned in the first line, “to promote (?) management activities” in the second, and then in the third there is only mention of “the managing for issues such as timber supply and biodiversity.” Which non timber resources are being talked about? What management activities are being promoted?

3.4.2 Prescribed fire - Objectives for prescribed fire could also include retention of site quality for regeneration purposes.

3.4.3 Fuel management – The last 2 sentences should be removed.

- Leaving a fire hazard to abate through natural processes will not meet FPC 12 month after harvest deadline.
- Access restrictions serve only to reduce the chance of ignition, not the intensity of fires should they happen.
- Access restrictions are available to the ministry for fire prevention, not fuel management, - usually are applied during extreme hazard, not for a prolonged period.

3.5 Forest Health – Suggest adding references from SMOOP to beetle proofing and harvest of beetle susceptible pine types.

-“to promote forest health” is unclear. Improve or manage might be more meaningful.

-“to ensure efficient delivery of programs.” This should be clarified as to what programs are being referred to.

3.6 Silviculture – Add references to legislated provincial standards for regeneration of logged or denuded areas. Also, it is suggested that mention of free growing damage assessments or other forest health considerations be included.

3.7 Roads – What does “...while minimizing withdrawals...” mean? Does this mean status quo, or will it result in less future withdrawals?

3.8.1 Access Management – Suggest adding “manage access consistent with provincial legislation and agency policy”. Also, Access Management Plans are no longer a specified requirement so, is this something specific proposed for TFL 14? If so, it should be explained.

5.1 Harvest Levels – The reference in paragraph 4 to low quality sawlogs is incorrect in that grades 4 & 5 are not sawlog grades. Also, grades 4 and 5 are the lumber reject grades, not grades 6 and X. Undersized (grade 6) is not charged to the AAC.

5.2 Economics and Employment – “increase employment if the company and the government can work in concert...” If this is the case, describe how there is a lack of co-operation. Otherwise, the statement should be removed.

5.3 Harvest profile – Suggest adding a description as to why the change in harvest profile is necessary. Is the available timber different? Or, are harvest systems economics the deciding factors?

5.4 Protection and conservation of non timber values - Suggest a forest health component should be recognized.

6.0 Review Strategy – This section is not necessary as the next management plan will use the timelines outlined in Part 2.00 of that document. Therefore, this section can be deleted.

7.2.6 District Manager Instruction – This section wasn't completed.

Yours truly,

Ross R. Tozer
Regional Manager

pc: Serg Pereverzoff, District Manager, Invermere Forest District
Brad Harris, Senior TFL Officer, Resource Tenures & Engineering Branch

August 24, 2000

Summary of changes in response to Regional Managers comments

The following is a summary of the comment provided from the Regional Manager Nelson Forest Region, to our submission dated May 30, 2000 of the Draft MP. Those comments and our responses and changes are referenced to the relevant sections of the plan:

Title Page – we expect the term of the MP will be 5 years, i.e. to November 30, 2005.

We have corrected the dates for the term of the plan as requested and removed DRAFT from the title.

There is also a new cover page provided for your binder.

2.3.1 Ownership – While there are no indications from BC Hydro of imminent plans for use of the logged ROW, BC Hydro has indicated that they want to retain the notation of interest on these lands.

As you suggested, we have added a comment regarding the notation of interest.

2.3.8 Landscape – Suggest adding “scenic area as made Known by District Manager” to first sentence, pg. 7.

We have added a comment regarding the scenic area as made known by the District Manager.

3.1 Management and Utilization of the Timber Resource – There should be a recognition of the influence of forest health factors.

We have included forest health in the list of factors to consider .This is now section 3.1.3 as the old 3.1.3 is no longer appropriate.

3.1.3 Partitions – The context of this section is incorrect. It should refer to suggested partitioning of the AAC into such forest types as deciduous or problem forests, in addition to a coniferous partition. If no partitioning is proposed, then this section is not applicable.

As there is no partition of the cut for the TFL we have removed this reference. This section has been replaced by a the requested Forest health section.

3.1.4 Proposed AAC – First sentence should read “...allowable annual cut (AAC)...”. The third sentence should read “Through *the term of* MP #8 an AAC of...”.

We have made these changes in this final version of the plan.

3.2.1 Visual quality – A minor point, the current vocabulary in visual landscape management uses the wording “visual landscape design” rather than “cut block size, configuration, and block reserves...”

We have incorporated your perspective and retained our original language for clarity.

3.2.5 Recreation resources – This section should be clearer. What this section should discuss or commit to is the following:

- consideration and incorporation of recreation values into forest management activities
- allowing and facilitating public use of the TFL for both facility based (campsites & trails) and non facility (hunting, dispersed camping, snowmobiling) recreation
- providing and maintaining recreation facilities (campsites & trails) at popular locations for public use
- managing for public use on the TFL by maintaining a recreation and landscape inventory, participating in the planning processes, etc.

We have added additional comments to this section. Please note that “facilitation” of hunting, campsites and trails etc. is through of the Ministries of Forests and Environment, Lands and Parks.

3.2.8 Fish and Wildlife Habitat – The second to last sentence “To incorporate (rather than “recognize”) natural entities such as disturbance patterns INTO planning... and in last sentence, we are unsure as to what is meant by “To promote?” “.

We have incorporated your recommended changes and added clarity to the last point of this section.

3.3.1 Non Timber Resources – This section needs to be clarified i.e. - “To explore (?) managing of non timber resources” is mentioned in the first line, “to promote (?) management activities” in the second, and then in the third there is only mention of “the managing for issues such as timber supply and biodiversity.” Which non timber resources are being talked about? What management activities are being promoted?

This section has been clarified as requested.

3.4.2 Prescribed fire - Objectives for prescribed fire could also include retention of site quality for regeneration purposes.

A notation regarding site quality objectives has been added.

3.4.3 Fuel management

- Leaving a fire hazard to abate through natural processes will not meet FPC 12 month after harvest deadline.
- Access restrictions serve only to reduce the chance of ignition, not the intensity of fires should they happen.
- Access restrictions are available to the ministry for fire prevention, not fuel management, - usually are applied during extreme hazard, not for a prolonged period.

The last paragraph of this section has been revised to note that road closures may be employed to reduce the hazard risk ratings. This would provide additional flexibility when prescribing post harvest treatments. This has been discussed this with Invermere Forest District compliance personnel.

3.5 Forest Health – Suggest adding references from SMOOP to beetle proofing and harvest of beetle susceptible pine types.

- “to promote forest health” is unclear. Improve or manage might be more meaningful.
- “to ensure efficient delivery of programs.” This should be clarified as to what programs are being referred to.

This section has been clarified as requested.

3.6 Silviculture – Add references to legislated provincial standards for regeneration of logged or denuded areas. Also, it is suggested that mention of free growing damage assessments or other forest health considerations be included.

Comments regarding “legislated provincial standards” and free growing have been added to this section as requested.

3.7 Roads – What does “...while minimizing withdrawals...” mean? Does this mean status quo, or will it result in less future withdrawals?

Minimizing withdrawals means that planning and subsequent construction will be done in such a manner that site occupation by roads is kept to a minimum.

3.8.1 Access Management – Suggest adding “manage access consistent with provincial legislation and agency policy”. Also, Access Management Plans are no longer a specified requirement so, is this something specific proposed for TFL 14? If so, it should be explained.

This section has been amended to note the requirement of proactive access management.

5.1 Harvest Levels – The reference in paragraph 4 to low quality sawlogs is incorrect in that grades 4 & 5 are not sawlog grades. Also, grades 4 and 5 are the lumber reject grades, not grades 6 and X. Undersized (grade 6) is not charged to the AAC.

This section has been corrected and clarified.

5.2 Economics and Employment – “increase employment if the company and the government can work in concert...” If this is the case, describe how there is a lack of co-operation. Otherwise, the statement should be removed.

This statement was made to highlight the necessity of continued co-operation in order to be successful in our joint endeavour to increase utilization and associated employment. It was not intended to point out a lack of co-operation.

Examples of issues that will require co-operative resolve are:

- *scaling methodologies associated with increased utilization*
- *the use of alternative funding sources to complement stand-tending activities that result in pulp fibre.*

5.3 Harvest profile – Suggest adding a description as to why the change in harvest profile is necessary. Is the available timber different? Or, are harvest systems economics the deciding factors?

As suggested, a comment has been added.

5.4 Protection and conservation of non timber values - Suggest a forest health component should be recognized.

Given that we have very little information with respect to forest health and non-timber resources, it is likely inappropriate to make comment.

6.0 Review Strategy – This section is not necessary as the next management plan will use the timelines outlined in Part 2.00 of that document. Therefore, this section can be deleted.

After discussion with Mr. Earl Sept, we have left this section in place. It is important to note that this is a summary of the requirements in Section 2 of the current TFL Licence document.

7.2.6 District Manager Instruction – This section wasn't completed.

This section has been removed as we did not receive specific instructions from the District Manager.



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AUG 02 2000

	General Mgr	Chief Forester	<input checked="" type="checkbox"/>
	Harvesting Mgr	Admin Forester	<input type="checkbox"/>
X	Forestry Mgr	Sity Mgr	<input type="checkbox"/>
	Admin Coord	Soils Analyst	<input type="checkbox"/>
	Purchasing Mgr	Forestry Analyst	<input type="checkbox"/>
	Log Buyer	Habitat Biologist	<input type="checkbox"/>
	Adv Plan/Env Mgr	Forest IS Mgr	<input type="checkbox"/>
	WPC Coord	GIS Forester	<input type="checkbox"/>
	Spec Prot Coord	Wildlife	<input type="checkbox"/>
	Cranbrook Area	Creston Area	<input type="checkbox"/>
	Elko Area	Canal Flats Area	<input type="checkbox"/>
	Spanwood Area	Parson Area	<input checked="" type="checkbox"/>
	Supt of Lands	Road Supt(s)	<input type="checkbox"/>

File: 19710-30/TFL 14

July 19, 2000

Lloyd Havens
Crestbrook Forest Industries
P.O. Box 4600
Cranbrook, British Columbia
V1C 4J7

FILE # TFL1448

Dear Lloyd Havens:

The Invermere Forest District review of the 20 year plan for TFL 14 Management Plan #8 submitted 2000/06/27 is complete. The 20 year plan is acknowledged as an acceptable area-specific representation of future timber harvest and is consistent with the Management Plan #8 assumptions.

The following considerations were noted in the approval of this plan:

Block design

- The proposed blocks were found to be scheduled in appropriate timber types and fulfil adjacency requirements.
- The proportion of harvest using a clearcutting silviculture system has increased from the previous 20 year plan from 50% to 90% primarily due to a change in definition. That is, this percentage includes clearcuts with reserves.
- Removal cutting in beetle proofed areas is prominent in the latter years of the 20 year plan.
- Block boundaries emulate natural boundaries and address other resource values.

Volume requirement

- The 20 year blocks capture 3.10 million m3 for a proposed cut of 3.06 million m3 for that period.
- Inventory volumes supplemented by cruise volumes, where available, were used to derive total block volumes.
- The inventory profile and logging chance is properly addressed.

Landscape unit constraints

- The Kootenay Boundary Land Use Plan (KBLUP) Implementation Strategy has been adopted in this planning exercise.
- The Terrestrial Ecosystem Mapping (TEP) based recruitment strategy deploys appropriate recruitment areas. The proposed harvest is consistent with this recruitment strategy and is supported by Ministry of Environment.
- Ungulate Winter Range (UWR) has been refined utilizing TEM data and has the concurrence of MoE staff. The consideration for modification versus partial retention harvesting due to MPB in a known scenic area is acceptable.

The plan clearly demonstrates that the proposed cut can be delivered in consideration of current constraints and values and has incorporated input from the agencies and public sources. Several concerns remain unresolved including access management issues but will be addressed through the Forest Development Plan process.

The plan is accepted as submitted.

Yours truly,



S.A. Pereverzoff
District Manager

pc: Larry Pedersen, Chief Forester, Victoria
Ross Tozer, Regional Manager, Nelson Forest Region
Peter Holmes, Forest Ecosystem Specialist, MoE



August 2, 2000

East Kootenay Environmental Society
Box 955
Golden, B.C.

Attention: Joan Dolinsky
President, Golden Branch

Dear Joan,

Thank you for taking the time to review and comment on the TFL 14 Management and Twenty-Year Plans. As you suggest, I encourage you to take the time to review the maps at your convenience.

The following is in response to your July 12 letter:

Visuals

- We will continue our endeavor to respect the visual quality of the West Columbia Bench. As pointed out during our field trip, topography and stand stability continue to make this a challenge. Our prescriptions are continually evolving as we gain more experience.
- In the backcountry, in many cases we are “softening” our block boundaries and using residuals to mitigate visual impacts, but obviously to a considerably lesser extent than on the Columbia Bench.

Lower Elevation Old Growth

- We have proposed an Old Growth Reserve and Recruitment Plan, based on ecosystems. The proposal focuses on fragments of existing old growth as well as ecosystems best able to provide biodiversity attributes over time.

As you know, a considerable portion of the Twelve-Mile and Lower Spillimacheen Landscape Units is occupied by Lodgepole pine. Although we may be forced to by regulations around old growth and mature reserve requirements, I think it somewhat folly to reserve pine stands for old growth. Given the silvics of Lodgepole Pine, and its susceptibility to mountain pine beetle, it is unlikely that the stand will meet recruitment objectives over time.

Old Growth Reserves and FENS

- The TFL Biodiversity and Old Growth Recruitment Plan identifies opportunities for old growth reserves, wildlife corridors and Fens. We intend to further confirm many of these through field work over the next two years. I think that the methodology for

maintaining the integrity of these areas will be defined by regulation, Landscape Unit planning, objectives for these areas established by biologists familiar with the TFL and CFI personnel. Further I think natural influences will have a considerable influence either abruptly or over time. This will also have to be considered.

I anticipate that we will have the opportunity to discuss this as planning proceeds. Hopefully you will have time to provide input.

Columbia River Wetlands

- I would like to discuss your concerns further. To date a considerable portion of the Columbia Benchlands has been accessed. We have endeavored to keep the roads away from the wetlands. I believe that additional access control through regulation and enforcement is necessary. Also some of the historic access should be put in to an inaccessible state.
- I do not necessarily agree that maintaining the majority of area in a mature age class is the best way to manage for birds and ungulates, in fact I think additional diversity would be an asset. We are working with our biologists to better integrate our management objectives for timber harvest and non-timber resources. You are welcome to join in some of our discussions.

Access Management

- Your right, access management is a concern I feel needs to be addressed. The 20-Year Plan is not the venue for addressing access management. Over the past number of years we have proposed various access management scenarios to the MOF and MOE through Access Management Plans, Forest Development Plans, meetings and ongoing discussions. Progress with respect to access management is proceeding slowly. It appears that these agencies are being constrained both politically and financially.
- I would appreciate EKES input into the planning process.

Again, it was good to talk to you.

Yours truly,
CRESTBROOK FOREST INDUSTRIES LTD.



George Richardson
Parson Area

/GR

Pc: CFI, Cranbrook
Serg Pereverzoff, MOF, Invermere
Peter Holmes, MOE, Invermere
Earl Sept, MOF, Region

Box 955
Golden, B.C.

July 12, 2000

George Richardson
Crestbrook Forest Industries
Box 118
Parson, B.C.

Dear George,

I had a chance to look over the 20 year Plan at the library but didn't manage to get to your office to look at the maps. I just wanted to make a few comments on behalf of EKES for the record and will take the opportunity to look over the maps after the summer is over.

Many EKES members and other members of the public appreciate the work Crestbrook has done in maintaining high visual quality on the West Bench. Thank you for helping keep our beautiful valley beautiful. More of the TFL should be managed this way to preserve view scapes.

The plan indicates that in the West Bench and Lower Spillimacheen areas, to meet current biodiversity guidelines there is no old forest available for harvesting at lower elevations. In these locations there should be no planned harvesting of old forests in the next 20 years. Is this the case?

Have potential old growth reserves been identified in TFL 14? When will they be designated? I understand you have some mapping of wildlife corridors and FEN's. What rules will be enforced in terms of maintaining the integrity of these areas? To maintain the high quality of wildlife habitat in the Columbia River Wetlands, the adjacent forests should be unroaded and be managed for elk wintering range and nesting birds. This means keeping most of the forest in a mature age class.

Controlling access and types of motorized and non motorized use on the landscape is very important to maintaining wildlife and recreational values. I know that access management has been a favorite topic of yours. Is it within the scope of the 20 year plan to address this? EKES would like to participate in access management planning and urge Crestbrook and the Ministry of Forests to put in place regulations that control access in much of the TFL. The growing commercialization of recreation and the increasing use of off road vehicles makes this type of action urgent. When will we see implementation of access control in the TFL? If it is not done soon, use patterns will be established and it will be difficult to control access.

Thank you for considering my comments and see you in the fall.

Sincerely,


Joan Dolinsky, President
East Kootenay Environmental Society Golden Branch



Crestbrook Forest
Industries Ltd.

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August 2, 2000

Ministry of Environment, Lands and Parks
Box 118
Wasa, B.C.
VOB 2KO

Attention: Jack Paterson
Area Supervisor

Dear Jack,

Thank you for your comment on Management Plan 8 for Tree Farm Licence 14.

With respect to designing cut blocks with "natural fringe" boundaries, opportunities to do so are likely but will be influenced by timber types and topography. We would appreciate your input when we reach the operational planning stage.

Yours truly,
CRESTBROOK FOREST INDUSTRIES

George Richardson
Parson Area

/ GR

Pc: CFI, Cranbrook
Serg Pereverzoff, MOF, Invermere
Peter Holmes, MOE, Invermere
Earl Sept, MOF, Region

Ministry of Environment, Lands, and Parks



FAX FACTS

Parson wds

DATE: July 18 2000

PAGES TO FOLLOW: 1

Original to follow by mail: (please circle one) Yes No

CONFIDENTIAL: _____ URGENT: _____ REGULAR: _____

TO: Mr George Richardson

PHONE: () _____ FAX: ~~250~~ 426-3406

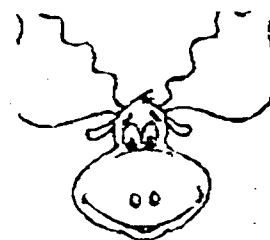
FROM: KWagar for Jack Paterson

BC Parks - Kootenay District
Box 118, Waa BC V0B 2K0
Phone: (250) 422-4200
(Cranbrook 426-8563 / Kimberley 427-7398)
Fax: (250) 422-3326

COMMENTS: _____

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JUL 19 2000

General Mgr	Chief Forester	<input checked="" type="checkbox"/>
Harvesting Mgr	Admin Forester	<input checked="" type="checkbox"/>
Forestry Mgr	Silv Mgr	<input type="checkbox"/>
Admin Coord	Soils Analyst	<input type="checkbox"/>
Purch Fiber Mgr	Forestry Analyst	<input type="checkbox"/>
Log Buyer	Habitat Biologist	<input type="checkbox"/>
Adv Plans/Env Mgr	Forest IS Mgr	<input type="checkbox"/>
FPC Coord	GIS Forester	<input type="checkbox"/>
Spec Proj Coord	Works Acc	<input type="checkbox"/>
Cranbrook Area	Creston Area	<input type="checkbox"/>
Elko Area	Canal Flats Area	<input type="checkbox"/>
Sparwood Area	Parson Area	<input checked="" type="checkbox"/>
Supt of Lands	Road Supt(s)	<input type="checkbox"/>





July 18, 2000
File Number: 83320-30/INVE

Mr. George Richardson
Planning Superintendent
Crestbrook Forest Industries Ltd.
BOX 118
PARSON BC V0A 1L0
Fax: 1-250-426-3406

Dear George Richardson:

RE: TFL 14, 20 YEAR PLAN

Thank you for the invitation to review Management Plan #8. The following paragraph outlines concerns we have pertaining to planned harvesting in the Vowell drainage.

Within plan #8 there are two proposed cut blocks along the North boundary of Bugaboo Provincial Park. According to the plan these are scheduled for years 2010 – 2014. It appears these blocks will have little visual impact upon a drainage where several older blocks already exist. Our concern is in regards to the fringe areas of the park boundary. We would prefer to see cut blocks with natural fringe boundaries as opposed to straight cut lines that provide an unnatural look and inhibit use by wildlife.

We look forward to your continued co-operation in this matter.

Yours truly,

Jack Paterson
Area Supervisor

cc: Mike Gall, Resource Officer

WJS/klw





Parks Parcs
Canada Canada

Mount Revelstoke and Glacier National Parks
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Revelstoke, B.C., V0E 2S0
(250) 837-7500, Fax (250) 837-7536

Parcs nationaux des Glaciers et du Mont-Revelstoke
C.P. 350, 301B, 3 Rue ouest
Revelstoke (C.-B.), V0E 2S0
(250) 837-7500, Téléc. (250) 837-7536

Date:	Pages (inc cover/page couverture incluse):
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To/À: George Richardson	Attn/À l'attention de:
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Fax/Télécopieur: 250-348-2222	Phone/Téléphone:
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From/De: Susan Hall	Signature:
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Canada

Mount Revelstoke and Glacier National Parks
Parcs nationaux des Glaciers et du Mont-Revelstoke

July 19, 2000
Box 350
Revelstoke, BC
V0E 2S0

George Richardson
Crestbrook Forest Industries
PO Box 118
Parson, BC
V0A 1L0

Dear George

Thanks for the opportunity to provide comments on your forest development plans. We strongly support your 20 year plan, particularly your application of biodiversity emphasis to a matrix of rare and wet ecosystems which comprise much of the support for biodiversity in your area. The CASH option, closer to minimum Forest Practice Code (FPC), would result in far less biodiversity preservation and likely contribute to declines of vulnerable wildlife.

We are very concerned about land management under minimum FPC (current direction) and proposed Land-Use Plan implementation, which, with the exception of caribou, is similar. We are very impressed that Crestbrook has developed a biologically sound means of mitigating many of the severe ecological impacts likely to result from adoption of minimum FPC.

We do remain concerned about:

1. Road Access. Our West Slopes bear study has documented low bear numbers for about 20 km on both sides of the trench due to settlement, associated poor management of attractants, and subsequent loss of bears via control action mortality. The trench now appears to be a complete impediment to movement and gene flow (a fracture zone) with bears relegated to higher elevation inaccessible areas. The mid-high elevation forested areas are now critical to grizzly bears.

Roads are now accessing the upper ends of drainages, potentially eliminating the last refuges for bears, and providing access to areas used by other sensitive species such as mountain caribou and goats. Suspected declines of goats throughout the Kootenays, for example, are thought to be due to a combination of excessive disturbance (public and industrial) and perhaps the creation of early seral communities (moose, deer) via logging nearby, thus increasing their vulnerability to predation and other losses.

Studies have shown that road access above .5-.6 km per km squared of road are likely to cause bear declines. We recommend signed road closures, preferably gated or otherwise blocked, that reduce access below threshold levels. Partial deactivation with extreme water bars for about .5

km has been effective is discouraging some summer ATV use. Enforcement is required for closures to be effective.

2. Harvesting in the Upper Spillimacheen. We are particularly concerned about proposed cut blocks in the upper Spillimacheen across from the Bald Hills in Glacier National Park. This area is our best, back-packing destination in GNP. The Bald Hills are the 10 kl long, north-south band of extremely scenic and fragile alpine meadows along our south-east border with view scapes to the east (provincial land) and west (into GNP). We had understood that timber values are marginal throughout this area and that harvesting with road building would not be economic, thus lessening the likelihood that development would occur in the near future.

We are very concerned that roaded access will provide ATV access to these fragile alpine meadows, of which only half occur in the park. Concerns about visitor use and trampling of meadow communities were raised with the Purcell Lodge and subsequently addressed via the creation of trails and a visitor education program. ATV use would of course cause much more severe damage.

If Crestbook proceeds with this part of the plan, we would like to discuss options to maintain the areas scenic and wilderness values. For example, an option might include the following:

- one pass only, deactivate and rehabilitate the road behind as logging proceeds, thus guaranteeing a brief period of industrial access only.
- ensuring that roads and logging do not inadvertently provide ATV access to the meadows
- maintaining visual values via partial cutting with retention of groups of trees - parkland appearance, so resultant harvested forest looks like very open upper ESSF.

3. Riparian Buffers, Movement Corridors, Wildlife Trees and Large Cut blocks

As discussed above, we strongly support your 20 year plan approach as it puts the allowable mature and old-growth emphasis where it counts - riparian areas, rare ecosystems, red and blue listed species, with needed supplementation of veteran tree patches throughout.

Recent evaluations of similar ecosystems in the US and BC have concluded that buffering only the current fish-bearing streams is an inadequate approach to retaining stream productivity for salmonids. We also have other sensitive riparian wildlife - Harlequin Ducks for example. Stream integrity requires wider buffers than FPC stipulates on the smaller streams (i.e. 10- 30 m is usually reported in the literature) and other supplementary sources of LCWD, for example, that delivered intermittently via land-slides and debris torrents.

Riparian buffers also provide essential drainage level connectivity for wildlife, particularly in drier ecosystems, hence our support for the concept of a Forest Ecosystem Network. We appreciate your effort to connect up your reserves - would it be possible to supplement/widen these riparian corridors and unbuffered streams with partial retention systems (30 % stems, veterans and green trees to become veterans later in the rotation) within the operable where required for connectivity?

Large cut blocks are being advocated in part on the basis of the biodiversity guidebook. We believe that several assumptions behind Biodiversity Guidebook recommendations are questionable as fire intensity and size have been highly variable (justifying almost any regime), also leaving behind a an extremely wide range of biological legacies (from extensive areas of partially burned forest to patches of surviving trees, to parkland like old-growth). Other poorly resolved issues include distinguishing natural versus human caused fires and interactions between fire regimes, stand history, and insects and disease. There is also confusion in wetter ecosystems about stand age versus time since fire (long-lived brush fields following fires in the ESSF and ICH potentially add another 30 to 100 years to stand age as an estimate of time since fire) and other issues (i.e. stocking density) that result in ecologically significant differences between logging and natural disturbance that are poorly addressed by the Biodiversity Guidebook.

Large cut blocks may be the most ecological sound trade-off if wildlife tree requirements are substantively increased, as indicated in your plan, and if riparian buffers are widened/connected beyond FPC requirements to result in functional FENs, also as suggested by your plan of including a matrix of wetter sites as the areas to which mature targets apply. This will also compensate, in part, for hydrological impacts expected from large openings. Also, as discussed, mature and old-growth targets in the pine zone are probably not supportable biologically; instead retention of veteran patches throughout cut blocks is recommended as per your 20 year plan.

We also recommend retention of any mature deciduous stands and allowing a significant deciduous component (15-20 %) on suitable sites. MOF research data suggests that the latter will enhance site productivity benefiting both crop trees and biodiversity.

Other Concerns: Land-Use Plan Direction

We are unclear about land-use direction regarding seral targets, but our understanding is that seral targets may have been largely eliminated in mountainous areas with the use of large amounts of inoperable from which to "obtain" seral targets. Wildlife tree targets had also been reduced with recent FPC direction and are assumed to apply with Land Use Plan implementation.

Studies here Revelstoke indicated that full FPC implementation would reduce Wildlife Tree habitat by 96-99 % compared to naturally-regenerated forests.

The overall result of Land-Use Plan implementation or minimum FPC appears to be little or no difference on the ground amongst biodiversity emphasis options. We are hoping that despite this direction, Crestbrook continues their commitment to well balanced integrated forest management by adopting the 20 year plan approach with its more ecologically sound approach to biodiversity and habitat preservation.

Thanks again for the opportunity to provide comments.

Sincerely



Susan Hall

Detailed Comments:

Bobbie Burns

Support proposed one pass approach if public access during and after can be effectively closed.

Recommend retention of avalanche chute buffers (not just the high value ones) and enhanced riparian stream buffers (to maintain hiding cover and provide secure movement for bears, also to reduce hydrological impact expected from 1 pass system).

Lower Spillimacheen

Strongly support proposed approach, particularly:

- maintaining fir veteran patches and stands and mature forest retention of riparian networks and rare ecosystems.
- compensating for large blocks with a interconnected matrix of wildlife tree patches - latter more closely duplicates a natural fire regime (biological legacy), providing some support (mostly lacking in our opinion due to inadequate FPC wildlife tree requirements and stocking standards) for large cut block direction in FPC.

Upper Spillimacheen

- See above comments, including concerns about road access, visual impacts, and the need for enhanced stream buffers to preserve fisheries values.

Twelve Mile

This area is also important to grizzly bears, according to our West Slopes data. Will visual management allow for wildlife movement (i.e. connectivity with the wetlands) and habitat values (i.e. greater wildlife trees and patches to provide a matrix)? What is planned regarding access?



August 2, 2000

Mount Revelstoke and Glacier National Parks
Box 350, 301B 3rd Street West
Revelstoke, B.C. VOE 2S0

Attention: Susan Hall

Dear Susan

Thank you for your discussion(s) and response to our MP #8 Final Draft and associated Twenty-Year Plan. As always, I find our open dialogue worthwhile. My response follows your July 19 letter.

Biodiversity

- Your support of our ecosystem-based approach to the application of biodiversity emphasis is appreciated. We will continue to work toward implementation of this goal. Hopefully upcoming guidelines will facilitate sufficient flexibility to do this effectively. Your continued participation is welcome.

Road Access

- We concur that effective access management is necessary. Accordingly we will continue to encourage the Ministries of Forests and Environment, Lands and Parks to employ and enforce a proactive, effective access management program. Work on this appears to be progressing, albeit very slowly.

Upper Spillimacheen

- We recognize your concerns with our proposed harvesting in the Upper Spillimacheen and invite you to be part of the planning process. The current 20-Year Plan has not had the benefit of detailed field reconnaissance and will be updated accordingly as planning progresses.
- Again, we also concur that there is a need for effective access management in the Upper Spillimacheen and like areas. Of note, we have previously made the Ministries of Forests and Environment, Lands and Parks aware of the access management needs in the Upper Spillimacheen and have advertised closure proposals in current and previous Forest Development Plans. We will continue to pay attention to this as planning proceeds.

Riparian Buffers, Movement Corridors, Wildlife Trees and Large Cutblocks

- As you are aware we are planning for riparian buffers and connectivity. The effectiveness to which these can be employed will be governed by rules under which we operate and our associated flexibility to manage. Details with respect to reserve widths, levels of retention etc., are sorted out at the operational level, considering site specific requirements. Obviously we have to weigh a variety of objectives, including harvesting a commercial timber crop, and find a balance between demands. I think there are many common goals with respect to riparian and habitat management and accordingly, am optimistic about what can be achieved.
- We intend to vary distribution of patch size across the TFL. Further, through our recent TEM inventory, we have documented TFL disturbance history and will analyze this for guidance.
- We do make a point of reserving, and where appropriate, propagating deciduous for the purposes you mentioned.



Other Concerns: Land-Use Direction

- I am not sure where you are getting your information on seral and wildlife tree targets. It is my understanding that the requirements remain though, distribution options have increased. Hopefully ecosystem based planning will have some influence on this.
- With respect to Wildlife Tree habitat, things here are considerably different than what you are citing for Revelstoke. Again, you are invited to come a have a look.

Bobbie Burns

- Thanks for your support of our proposal to limit the amount of time this drainage is open. With respect to avalanches, I still think it is important to correlate the buffering of avalanches with their respective habitat value.

Lower Spillimacheen

- We will continue with this approach and see where it goes.

Twelve Mile

- Fortunately, managing for visuals and facilitating connectivity are in concert with each other. Through the Biodiversity Management and Old Growth Management Strategy we have planned for connectivity and Old Growth areas in conjunction with riparian management and Wildlife Tree Patches.
- We have proposed the limiting of access other than when necessary for forestry operations. How this is facilitated will depend on the provincial government.

Susan, we are looking forward to a TFL field day with you and your peers. If you have any further questions, please contact me.

Yours truly,
CRESTBROOK FOREST INDUSTRIES



George Richardson
Parson Area

/GR

Pc: CFI, Cranbrook
Serg Pereverzoff, MOF, Invermere
Peter Holmes, MOE, Invermere
Earl Sept, MOF, Region



August 2, 2000

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Purcell Lodge
ABC Wilderness Adventures Ltd.
P.O. Box 1829
Golden, B.C.
VOA 1KO

Attention: Paul Leeson
Manager

Dear Paul,

Thank you for your response to the TFL #14 Management and Twenty-Year plans. The following is in response to your letter of July 19, 2000.

First we think it necessary to clarify your statements regarding commitments made at the CORE table and in the Kootenay – Boundary Land Use Plan as they appear erroneous and somewhat misleading.

You state that under the Special Management Area Status for this area “no future road development would be permitted in this area” and that our CORE table representative was specifically challenged and accepted this limitation. We have consulted with an individual familiar with the CORE table proceedings and have been advised that no such commitment was made.

Please reference the Management Objectives for KBLUP Special Management Area #16 – Upper Spillimacheen. They direct the planning process to recognize tourism and wilderness as prominent and to prepare and implement plans for rehabilitation of roads to be constructed in the area. They do not request that the area be taken out of the forest harvesting area of the TFL.

Further, I can not discern how you came to this conclusion given the following:

- ADVENTURE BOUND CANADA - Management Plan For Commercial Backcountry Recreation In The Upper Spillimacheen River and Caribou Creek Drainages, May 1987 (see ABC Management Plan – pages 19, 20).
 - “If sensitive harvesting practices and prescriptions are applied and access road serving individual blocks are open only for the period of active harvesting, timber extractions will have little impact on Adventure Bound’s activities”
 - “Some of our travel routes traverse areas that in all likelihood will be harvested, but none of our destinations will ever be impacted by logging. No special consideration of our tourism operation will be required beyond conscientious application of normal harvesting techniques”.
 - “If Crestbrook forest Industries is sensitive to the tremendous wilderness values inherent in this remote area, Adventure Bound has no quarrel with their forest management activities”.

Our TFL operational planning is consistent with the intent of the Adventure Bound Canada (ABC) management plan.

- Our review of various meeting minutes in which you participated, as well as various correspondence, indicate that you have continuously acknowledged forest harvesting commitments for the North Spillimacheen area.
- We also recall several discussions, Forest Development and Management Plan reviews with yourself in which we discussed many of the concerns expressed in your July 19 letter. These discussions would not have been necessary had you thought no roads would be permitted in the North Spillimacheen area.

Rather than continue elaboration of this point, we propose continued dialogue under the intent recognized when ABC proposed their original management plan. We think it best that we have open and honest discussions that recognizes both our interests, and more importantly, that of the area.

Our plans indicate that approximately 21% of the productive operable area of the North Spillimacheen planning cell is to be considered for harvest over the next twenty years. This is yet to be confirmed through ground reconnaissance. Once in the field, we will be better able to assess operability, economics, visual impacts, and silviculture prescription options.

We recognize that access must be coordinated during and after harvesting. The final decision will be made by the District Manager considering input from ourselves, the Ministry of Environment, Lands and Parks and the public.

In closing, I would like to note that we also have to plan for recreation management, including the public, within the North Spillimacheen area.

Yours truly,
CRESTBROOK FOREST INDUSTRIES LTD.



George Richardson
Forestry Planning Superintendent, Parson Area

/GR

Pc: CFI, Cranbrook
Serg Pereverzoff, MOF, Invermere
Peter Holmes, MOE, Invermere
Earl Sept, MOF, Region
East Kootenay Environmental Society
Glacier National Park
Ministry of Environment, Cranbrook

PURCELL LODGE

A ROCKY MOUNTAIN HIGH

ABC Wilderness Adventures Ltd.
P.O. Box 1829 Golden BC V0A 1H0
Phone: 250-344-2639 Fax: 250-344-5520
Email: places@rockies.net
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Management Office
Paul Leeson or Ann Sutton
Phone/Fax: 250-340-8439
Email: moonraker@redshift.bc.ca

Crestbrook Forest Industries Ltd.
P.O. Box 118
Parson, B.C.
V0A 1K0

July 19, 2000

Attention: George Richardson
Area Forestry Planning Superintendent

RE: TFL # 14 – 20 Year Plan Comments

Dear George,

Please thank Paul Frasca for his efforts in forwarding to me the relevant materials from your latest 20 Year Plan. I regret being unable to personally attend a viewing of the draft Plan in your office, and find it unfortunate that I could not schedule time for an in-person discussion of those elements of the plan that might impact our Purcell Lodge operation. However, this is a difficult time of year for me to get away from the guest responsibilities in our tourism operations, therefore I'll have to do my best to provide some constructive comment in written format.

Without the benefit of an open discussion about your plans, I must limit most of my comments to a general discussion of the issues and impacts surrounding your plan for future harvesting activity north of Baird Brook, in the upper North Fork of the Spillimacheen River. It appears you have designated this as part of CP 401.

As a forester, I personally support the need for a strong and vibrant forest industry in the Province. However, I also have concerns about the sustainability of harvesting operations in some geographic areas, and their impact on equally important resources and their associated user groups. The Upper North Fork is one of those areas, and together with several other public and commercial sector representatives, I made those views known at the CORE Table responsible for the draft KBLUP. While the government has not yet officially adopted this Plan as an approved higher level planning tool, Crestbrook Forest Industries did make sincere commitments regarding this specific area during this consensus building process.

I regret that I feel it necessary to note, that in return for your restrictive commitments on specific and limited areas of your forest tenure, other sectors were most accommodating in their acceptance of relatively "normal" industrial harvesting and management practices on the bulk of Tree Farm License #14. With the possible exception of some limited old growth, large carnivore, and riparian concessions, your company was granted very favorable land use guidelines on the

majority of the land base on which you operate. As one of the tourism sector representatives during this protracted planning process, I must say that I am now much more accommodating of normal industrial forest activity on the bulk of the Provincial land base, and in return, I expect the forest industry to live up to their commitments on those small portions of the landscape granted special status in the KBLUP.

Specifically, the Upper North Fork of the Spillimacheen was one of those rare areas that was granted "Special Management Status" by the Table. By the full consensus of the Table, the only general management guidelines assigned to this area were that the tourism and wilderness values of the area would be the dominant features considered in any lower level planning process, and that no future road development would be permitted in the area. Your table representative was specifically challenged on his acceptance of this last point, and was clear in his acceptance of this management limitation. On the strength of this commitment, a variety of sectors supported your company in consensus decisions assigning a variety of other landscape units much more favorable designations. Unless land managers wish to re-open land use discussions concerning acceptable levels of industrial activity on the bulk of the Tree Farm, it seems to me that some considerable credence should be given the public commitments made by Crestbrook Forest Industries in respect of specific areas, while participating in this landmark planning process.

It equally concerns me that both the government and Crestbrook continue to indicate that the entire forested area of the Upper North Fork is within conventional operability lines, and therefore considered part of the contributing volume in the calculation of the annual allowable cut for the Tree Farm. Just because the landscape is considered operable to the limit of tree growth, does not mean that trees can be harvested in a sustainable manner on this land base. As I write this letter, these sub-alpine forest types are as yet, still blanketed in snow, a regular occurrence in this particular drainage. A random and yet detailed sampling of these timber types, confirms that local climatic conditions produce a litany of physical defects, and together with remarkably slow growth, this mechanical damage encourages a high incidence of rotten logs. Local forest fire history also demonstrates that harvest rotations, if successful, will be in the order of several hundred years in duration. A positive economic return from logging is doubtful, and any return will only be available at intervals that cause input costs to be amortized to ridiculously high levels.

Put simply, environmental factors aside, this geographic area would never survive a cost benefit analysis. The revenues from the few logs actually delivered to the mill would never fund the cost of building and deactivating roads, harvesting, log hauling, reforestation, and stand tending. While producing short-term jobs, the harvesting of this area would destroy sustainable long-term employment opportunities in the tourism sector, jobs that have no social cost, and little environmental impact on this sensitive ecosystem.

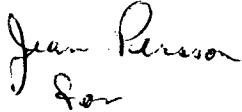
Unfortunately, at this time, I have no comments pertaining to your specific plans for CP 401. While I believe there is much our companies can do to work together in the pursuit of mutually beneficial management goals, the inclusion of the Upper North Fork in your harvesting plans puts us at considerable odds. For the reasons outlined, I am adamantly opposed to any large-scale conventional harvesting activity in the Upper North Fork of the Spillimacheen River. In my considered opinion, such a proposal is environmentally irresponsible, and contradicts firm commitments made by your company, and then accepted in good faith by the constituents at the KBLUP.

The road development and timber harvesting proposed in your 20 Year Plan would also irreparably damage the success and sustainability of the wilderness tourism business now firmly established at Purcell Lodge. I believe that it is clear that the continued operations of Purcell Lodge can provide significant long-term economic benefit to the Province. Surely this demands a more full accounting of both the economic and environmental reasons for so completely discounting the commitments made by your company at the Kootenay Boundary Land Use Planning Table. Done properly, such an exercise should support a significant modification of your proposed management strategy for this area.

I respectfully request that you take a moment to more fully recognize the intention of all the participants in developing the consensus based resolutions of the KBLUP, particularly with respect to this specific landscape unit. Should you do so, the responsible course of action would be to then make application to have these volumes deleted from your Annual Allowable Cut calculations for Tree Farm # 14. You would then be free to apply wilderness management strategies to the area in full support of your mandated multiple resource management responsibilities for the Tree Farm. I would hope that the Ministry of Forests, as prime custodians of the KBLUP, would wholeheartedly support you in these initiatives.

I thank you for your full consideration of my environmental, and social concerns. In my view, the public has already spoken with respect to their desire for a de facto "wilderness" status within this landscape unit. Therefore, It is my fervent hope that any management oversight made by your company, (in respect of the provisions of the KBLUP), can be corrected prior to the need for any further public involvement in respect to this area.

Yours truly,



Paul Leeson,
Manager,
ABC Wilderness Adventures Ltd. and
Places Less Travelled Ltd. – Purcell Lodge.

C.C.

East Kootenay Environmental Society
Glacier National Park
Invermere Forest District
Ministry of Environment - Cranbrook

SPECIAL MANAGEMENT AREA #15 (Map 5)
MOBERLY MARSHES
AREA: 3,136 hectares
POLYGON NUMBER: 14-02

See Special Management Area #27 for description of values.

SPECIAL MANAGEMENT AREA #16
UPPER SPILLIMACHEEN
AREA: 6,462 hectares
POLYGON NUMBER: 15-01

LOCATION/DESCRIPTION:

This area is located 25 kilometres south-west of Golden in the upper end of the Spillimacheen valley. It consists of high elevation alpine and subalpine areas with important scenic, tourism and recreation values. From the Bald Mountains one looks across the Beaver River valley at the high glaciers and peaks of the Sir Donald Range in Glacier National Park.

FIRST NATION AREA OF INTEREST: Ktunaxa-Kinbasket Nation, Shuswap Nation

RESOURCE EMPHASIS VALUES:

Protected Area Support Zone: High

This unit is adjacent to Glacier National Park and the proposed Canyon Creek Special Management Area.

Wildlife and Ecology: Very High

This is an excellent area for elk, deer, moose mountain goat and grizzly.

Visual Quality: High

It is important to maintain scenic values for visitors and residents visiting this area.

Recreation and Tourism: Very High

The Purcell Lodge is located in this unit, a four season wilderness lodge. The area is also an important part of a heli-skiing tenure and an outfitting area.

Culture/Heritage: Low

OTHER VALUES:

- Mineral: This area is rated as moderate for mineral capability. There are no claims in the area.
- Forestry: The area supports good forest stands at lower elevations, however most of the unit is alpine and subalpine.
- Agriculture: There is no history of range use in this area.

REGIONAL CONTEXT:

Special management in this area will provide for the maintenance of important wildlife, wildland and representation values in a general area that has seen extensive logging activity in lower areas.

MANAGEMENT OBJECTIVES:

The management of this area should be predicated on maintaining the substantial tourism and recreation values in this area. The unit should be managed to maintain the wilderness character of the area with rehabilitation plans for roads constructed in the area.

SPECIAL MANAGEMENT AREA #17 (Map 5)

JUMBO-UPPER HORSETHIEF

AREA: 29,649 hectares

POLYGON NUMBER: 15-7

LOCATION/DESCRIPTION:

This area is located 30 kilometres west of Invermere along the Purcell divide. It consists of high elevation alpine and subalpine areas in the Upper Horsethief and Jumbo Creek watersheds with important scenic, wildlife, tourism and recreation values.

FIRST NATION AREA OF INTEREST: Ktunaxa-Kinbasket Nation, Shuswap Nation

RESOURCE EMPHASIS VALUES:

Protected Area Support Zone: High

This unit is adjacent to the Purcell Wilderness Conservancy and proposed additions to that area.

Wildlife and Ecology: High

This is an important area for elk, deer, moose mountain goat and grizzly. Jumbo Pass and Stockdale Pass are two of the few passes used by wildlife to move across the Purcell divide. No other passes occur to the north until one reaches the Spillimacheen drainage. These movement corridors are important for maintaining natural genetic interchange between populations.

Visual Quality: High

It is important to maintain scenic values for visitors and residents visiting this area.

Recreation and Tourism: Very High

Many residents of Invermere also use the area; residents of communities in the West Kootenay hike up the Glacier Creek drainage to a cabin in Jumbo Pass and hike, ski and climb in that area. This unit contains the Lake of the Hanging Glaciers, rated No. 11 in PAS. It is a nationally significant recreation site. There is high value throughout the unit for a variety of wilderness-oriented recreational activities.

Jumbo Creek has been proposed as a site for a major downhill ski resort development, including summer skiing on the glaciers between Jumbo and Farnham Creeks. It is also used by an outfitter and a heli-skiing operation.

majority of our winter travel and recreation takes place near and above timberline. For this reason we are sure our activities and presence would have little effect on a trapline. Due to the remote nature of the area some mutual benefit may be generated when safety concerns are considered.

6. FISHERMEN -

Adventure Bound plans no organized fishing activity during our tours. Individual guests with valid fishing licenses may wish to relax for an hour or two by wandering off for a little fishing. This is sure to be a very low intensity resource use and only occasional meetings with other fishermen are likely to occur. Any streamside or lakeside meetings are likely to be pleasant and conversational as individuals share a common interest. There will be no large organized group to pose a threat to the resource.

Our dispersed travel patterns should not bring us within sight or sound of fishermen very often. No disturbance should be associated with any travelling group as we will simply be passing through and not utilizing motorized transport. No ABC facilities will be sited where they will disturb any traditional fishing use.

* 7. FOREST RESOURCE ACTIVITY -

Commercial forest harvesting activities will almost certainly be limited to old growth, mature Spruce-Balsam timber types in the lower valleys. If sensitive harvesting practices and prescriptions are applied and access roads serving individual cutblocks are open only for the period of active harvesting, timber extractions will have little impact on Adventure Bound's activities. Some attention to basic principles of Landscape Architecture will serve to minimize visual impact for our clients and other user groups and ensure attention is not diverted from the spectacular mountain scenery.

Some of our travel routes traverse areas that in all likelihood will be harvested, but none of our destinations will ever be impacted by logging. No special consideration of our tourism operation will be

required beyond conscientious application of normal harvesting techniques. Some notice of logging or road building activity will allow Adventure Bound the opportunity to route client groups away from the hazards and disturbance presented by active harvesting operations.

If Crestbrook Forest Industries is sensitive to the tremendous wilderness values inherent in this remote area, Adventure Bound has no quarrel with their forest management activities.

8. HELI-SKIING ACTIVITY -

Heli-skiing activity, to date, has been of an extensive nature. The area utilized by Adventure Bound clients has seen intensive activity on only a few days each winter with occasional runs made on several more days each year. If this pattern of use continues and new applications for heli-ski runs are limited to areas outside the boundaries of our operation, ABC foresees no significant impacts on their operation. Because we utilize helicopter transport for our own transportation in the winter, clients can accept the disturbance created by heliskiing for some limited portion of their stay with us.

No formal agreement with Rudi Gertsch has been discussed but we are aware of his normal runs on Bald Mountain and endeavor to utilize them on a very limited basis. To date, Rudi seems to avoid using the area on a repetitive daily basis and this mutual cooperation serves nicely to avoid potential conflicts. In the future, we are confident that flexibility, compromises, small client groups, and the dispersed nature of our activities will limit our impacts on the heli-skiing operations. The continuation of a similar courteous approach by Rudi will eliminate the need for formal restrictive agreements or the involvement of government regulation; certainly a preferable situation for both of us.

9. HELI-HIKING OPERATIONS -

Access to this area in the summer is not nearly as restrictive as in the winter months and humans and wildlife utilize these drainages to a far greater extent