



Xc R.W.  
David Carr

NAME	DATE	INITIALS
R.H.L.		
R.P.F.		
G.C.		
R.N.L.		
G.M.		
J.C.		
G.D.		
S.T.H.		
A.B.		
M.S.		
R.W.		
A.S.		
L.L.		
OTHER		
FILE		

OCT 03 2001

File: 19710-30/TFL 8

September 27, 2001

G. C. Bekker, R.P.F.  
Forestry Manager  
P.O. Box 70  
Midway, British Columbia  
V0H 1M0

Dear G.C. Bekker:

In accordance with Section 2.16 of Tree Farm Licence No. 8 the following comments on your Draft Management Plan 10, 2002 – 2006 are to be considered in the development of the timber supply analysis, twenty-year plan, and proposed management plan.

**Section 1.1 Physical Description**

In Management Plan No. 9 the TFL landbase was 77,664 ha. The deletion of 163 ha in 1998 reduced the landbase to 77,501 ha. In this management plan the landbase is a slightly larger 77,719 ha, whereas the landbase in the information package is a slightly smaller 77,471 ha. It is appreciated that the small differences in area may be the result of mapping system changes or other similar reasons but the plan should explain the cause of the variations.



**Section 1.2 History**

The text in this section refers to the "first half of this century". This wording should be updated.

**Section 4.1.3 Allowable Annual Cut**

The Chief Forest approved the deletion of 163 ha of land from TFL 8 effective August 12, 1998, not on July 7, 1998 as indicated in this section.

**Section 4.1.4 Small Business Enterprise Program**

This section should explain that timber harvested under the Small Scale Salvage Program is applied to the Small Business Forest Enterprise Program's apportionment.

**Section 4.2.1 Visual Quality**

The area adjacent to Highway 33 through Block 2 of the TFL was named as a Scenic Area in the Kootenay Boundary Land Use Plan Implementation Strategy. However, when the Kootenay Boundary Higher Level Plan order was made the area was inadvertently omitted from the plan. Consequently the Higher Level Plan Scenic Area map does not designate the Highway 33 corridor through Block 2 of the TFL as a scenic area. The Boundary Forest District is aware of the omission and would like to apply Visual Landscape Management practices to area until the omission can be corrected. A map of Draft Forest Development Plan Visual Quality Objectives (VQO) is available at the Boundary Forest District. This section of the management plan should be amended to reflect the licensee's intent to manage to the District Draft VQOs.

**Section 4.2.8 Recreation**

The abandoned Kettle Valley Railway corridor is private land that is owned by the Province of B.C. and BC Assets and Lands Corporation (BCAL) is the management agency. If the licensee intends to utilize the corridor for access and log hauling they should contact BCAL not the Ministry of Forests.

**Section 4.5 Forest Health**

Voles should be added to the list of agents that inflict damage to isolated patches of regenerated forests.

**Section 4.5.1 Detection**

Other sections of the plan indicate that populations of Mountain Pine Beetle on the TFL have subsided to endemic levels. Therefore it may not be appropriate to describe this insect as an "active pest". Also, root rot pixel surveys are no longer the preferred method for detecting root rot infestations. A risk assessment matrix described in *Armillaria Root Disease Management Guidelines For the Nelson Forest Region*, Technical Report TR - 014 is the currently acceptable method for assessing the risk of root disease in forest stands.

**Section 4.5.2 Prevention and Control - Western Spruce Budworm**

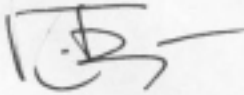
An infestation of Western Spruce Budworm began spreading into the Boundary Forest District 15 years ago not 5 years ago. The population subsided in 1993 rather than "during the past 5 years".

Resource inventories are intended to be included in the draft management plan. However, since some of the inventories are being updated, the licensee suggested that the inventories included in Management Plan No. 9 serve as a basis for the Draft Management Plan No. 10. The licensee has advised that Management Plan No. 9, complete with the current resource inventories was available during the public review period for Draft Management Plan No.10.

G. C. Bekker

If you have any questions regarding these comments please direct them to Don Youwe,  
Timber/Woodlot Forester at (250) 354-6143.

Yours truly,



Ross R. Tozer  
Regional Manager  
Nelson Forest Region

p.c.: Larry Pedersen, Chief Forester, Ministry of Forests, Victoria  
Gary Townsend, Director, Timber Supply Branch, Ministry of Forests, Victoria  
Charlie Klasen, Timber Tenures Forester, Resource Tenures and Engineering Branch,  
Ministry of Forests, Victoria  
Glen Thompson, District Manager, Ministry of Forests, Boundary Forest District