

**Wells Gray Community Forest Corp.**  
**Forest Stewardship Plan**  
**Community Forest Agreement CFA\_K2A**

FSP ID:

**August 13, 2021**

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## 1.0 Definitions and Interpretation

### 1.1 Definitions

In this FSP, unless this FSP specifies, or the context requires, otherwise:

- **“Act”** means the Forest and Range Practices Act S.B.C. 2002, c.69, as amended from time to time;
- **“Evaluation”** means an assessment conducted by a **Qualified Registered Professional** that examines, on a site specific basis, the social, economic and environmental factors as well as relevant factors as described in FPPR Schedule 1. An evaluation includes the development of alternative results or strategies that are consistent with the intent of the applicable objective.
- **“FDU”** means a Forest Development Unit to which this FSP applies as outlined on the FDU Map in Appendix E;
- **“Forest Act”** means the Forest Act R.S.B.C. 1996, c.157;
- **“FPPR”** means the Forest Planning and Practices Regulation, effective February 29, 2016, as amended from time to time;
- **“FRPA”** means the *Act*, and the regulations thereunder;
- **“FSP”** means a Forest Stewardship Plan;
- **“Holder”** means the Holder of this FSP: the Wells Gray Community Forest Corporation;
- **“Kamloops LRMP”** means the Kamloops Land and Resource Management Plan approved by the government in 1995 and as amended from time to time;
- **“Land Use Order”** means the Ministerial Order under the Land Use – Land Use Objectives Regulation for Old Growth Management Objectives for the Kamloops Land and Resource Management Plan Area, March 5, 2013;
- **“License”** means an agreement under the Forest Act;
- **“Minister”** means the minister responsible for the Forest Act;
- **MFLNRORD** – means the Ministry of Forests, Lands, Natural Resource Operations, and Rural Development.
- **Notification** – is a process that informs stakeholders, the Crown, First Nations and other affected parties when primary forest activities are being planned or being implemented in a location that may be of interest to the person or organization that is being notified. This notification will be completed at least 60 days ahead of industrial activities and will be completed once 60 days is passed or if the stakeholder, the Crown, First Nation or other affected party responds in writing, and any issues that are observed are resolved. Resolution means mitigation strategies have been developed and implemented to the satisfaction of both parties.
- **Primary Forest Activity** - means timber harvesting, road construction, road maintenance, road deactivation and silviculture treatments carried out by the FSP holder.
- **“Qualified Registered Professional”** means;
  - (1) A person with the prescribed qualifications, and is licensed by one or more of the following;
    - (a) an agrologist under the *Agrologists Act*,
    - (b) a professional biologist under the *College of Applied Biology Act*,
    - (c) a professional engineer or professional geoscientist under the *Engineers and Geoscientists Act*, or
    - (d) a forest professional under the *Foresters Act* and being authorized under that Act to practice as a professional in relation to the subject matter prescribed under that paragraph or those paragraphs, as the case may be, and;
  - (2) has the appropriate education, experience and training to carry out the activity.

- **"Significant Cattle Damage"** - means damage to trees within a cutblock that a) was caused by cattle, and b) has affected or is likely to affect the ability of those trees, or the area on which those trees are located, to conform with the requirements in Part 7 of this FSP.
- **"Submission"** means the electronic submission of a Cutting Permit or Road Permit to the Forest Tenures Administration (FTA) system for approval.
- **"Wildlife Tree Patches"** means an area occupied by a group of trees with special characteristics that provide valuable habitat for the conservation and enhancement of wildlife.

## 1.2 Definitions under Enactments

Unless otherwise expressly indicated, or indicated by context, terms used in this FSP have the definition given them, as of the Submission Date, in *Forest and Range Practices Act* and associated regulations and the *Forest Act* and the regulations under them, as amended from time to time.

## 1.3 Changes in Legislation

Subject to Section 1.2, or if otherwise specified in this FSP, if legislation referred to in this FSP is renamed or a provision of legislation referred to in this FSP is renumbered, the reference in this FSP is to be construed as a reference to the provision as renamed or renumbered, as the case may be.

## 1.4 Exemptions under Sections 12.1 to 12.5 of the FPPR

The following paragraphs are included in this FSP for the purpose of obtaining an exemption under sections 12.1 to 12.5 of the FPPR from the following sections of the FPPR:

Section of FSP	Section of FPPR under which Exemption Provided	Section of the FPPR to which Exemption Applies
4.2.1	12.2	35(3), 35(4), 35(5), 35(6), 35(7)
4.2.3	12.3	50, 51, 52
4.2.4	12.32	59, 60, 61 as they pertain to cumulative hydrological effects on water quality affecting human health in a community watershed.
4.2.6	12.5(1), 12.5(2)	66, 67

## 2.0 Submission Date, Term and Commencement Date of FSP

### 2.1 Submission Date

The date of submission of this FSP is August 31, 2020.

### 2.2 Term of Plan

The term of this FSP is 5 years beginning on the Commencement Date.

### 2.3 Commencement

The commencement date for the term of this FSP is the date specified by the minister in approving this FSP.

### 3.0 Application of this FSP

#### 3.1 FSP Holder

The holder of this FSP is the Wells Gray Community Forest Corporation.

#### 3.2 Application of this FSP (FRPA s. 3(4))

This FSP applies to Community Forest Agreement K2A (CFA\_K2A).

Subject to exceptions under the FRPA, this FSP applies to cutting permit and road permit applications located within the FDU.

The application of individual results and strategies is intended to be either an outcome of a forest practice, or to be something considered during the planning process when developing timber harvesting or road construction plans, respectively. Rather than repeating this in each result or strategy, the reader is encouraged to understand that this notion is implicit given the nature of the FSP.

Stocking standards will apply to individual stands, as per the FPPR s.44(1), as opposed to collectively across cutblocks.

#### 3.3 Forest Development Units in Effect on the Date of Submission of this FSP (FPPR s. 14(1)(B))

The FDU map (Appendix D) shows the forest development unit that would be in effect with the approval of this FSP.

#### 3.4 Items identified in this Forest Development Unit (FPPR s. 14(3)).

The FDU Map (Appendix D) identifies the locations of the following items that were in effect on the submission date in accordance with FPPR section 14(2) and (3), and are in this FDU:

Ungulate Winter Range	Scenic Area
Wildlife Habitat Area	Community Watershed
Fisheries Sensitive Watersheds	Old Growth Management Areas
Lakeshore Management Zones	Openings and RP's held by the agreement holder

## 4. Results or Strategies

### 4.1 Incorporation of LRMP Objectives into the FSP

On January 23, 2006, the Minister of Agriculture and Lands signed the Order amending the “original order” dated January 23, 1996 which declared the Kamloops Land and Resource Management Plan (KLRMP) to be a higher level plan (HLP). The purpose of the amended order is to facilitate implementation of the KLRMP in the context of the Forest and Range Practices Act and Forest Stewardship Plan content requirement. The order clarifies which provisions regarding zones, objectives and strategies from the KLRMP constitute the HLP objective and establish the area, or (Special) Resource Management Zone, to where the objective applies. Twenty six objectives were outlined in the Higher Level Plan Order (HLPO). This Order was amended again in January 2009 to facilitate the implementation of the Mountain Caribou Recovery Implementation Plan by removing the Caribou Management Objective from the Kamloops Higher Level Plan Order. Results and strategies have been prepared for all HLPO objectives that apply to the CFA\_K2A FDU.

#### 4.1.1 Water Management (KLRMP Objective 2.1.2)

Objective	Ensure implementation of a referral process to notify all potentially impacted water licensees when development is proposed.
Applicable Area:	Within the FDU.
Strategy	<p>Approach to Harvesting and Roads</p> <p>If a Holder of this FSP is harvesting a Cutblock or constructing a Road to which this FSP applies, that Holder will:</p> <ul style="list-style-type: none"> <li>(a) provide <i>notification</i> to the holder of a “licensed” waterworks during the preparation of operational plans pertaining to the Cutblock or Road when the licensed waterworks is located within 500m. downstream from planned harvesting or road construction activities; and</li> <li>(b) notify holders of licensed water intakes, a minimum of 24 hours prior to the commencement of timber harvesting or road construction.</li> </ul>

#### 4.1.2 Riparian Management Areas (KLRMP Objective 2.1.2.1)

Objective	Manage riparian areas, including streams, wetlands and lakes in accordance with the Forest Planning and Practices Regulations and the Kamloops and Clearwater District Lakeshore Management Guidelines or other applicable management tools or agency agreements.
Applicable Area:	Within the FDU.
Result	<p>The results or strategies included in the following sections of this FSP are the results or strategies for this objective:</p> <ul style="list-style-type: none"> <li>4.1.5 Inland Fisheries</li> <li>4.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Areas</li> <li>4.2.6 Wildlife &amp; Biodiversity – Stand Level</li> </ul>

#### 4.1.3 Old Growth Management (Ministerial Order under the Lands Act - Land Use Objectives Regulation; Old Growth Management Objectives for the Kamloops Land and Resource management Plan Area.)

Objective	1. Conserve biodiversity by retaining old forest values and attributes, or rare features within the OGMAs across the landscape units over time.
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	<p>2. Maintain all timber within OGMA's except as required to accommodate the following purposes:</p> <ul style="list-style-type: none"> <li>a) to prevent the spread of insect infestation to diseases that pose a significant threat to forested areas external to the OGMA;</li> <li>b) to address safety hazards associated with primary forest activities;</li> <li>c) to provide for guyline clearances and tailhold anchors;</li> <li>d) to address fuel management concerns and related safety hazards;</li> <li>e) to provide road access where no alternative practicable option for road location exists; or</li> <li>f) to facilitate timber harvesting that will result in operationally practicable cutblock boundaries.</li> </ul> <p>3. Primary forest activities conducted for the purposes under section 2 must:</p> <ul style="list-style-type: none"> <li>a) be conducted to the minimum extent necessary to accommodate the purpose; and</li> <li>b) not exceed the lesser of two hectares or 10% of an individual OGMA polygon pre 20 year time period.</li> </ul>
Applicable Area:	Within the FDU.
Result	When the holder of this FSP carries out primary forest activities, the holder will ensure that the activities are designed and carried out in a manner consistent with the requirements of the <i>Land Use Objectives Regulation - Old Growth Management Objectives for the Kamloops Land and Resource Management Plan Area, March 5, 2013</i> .
Complimentary Result or Strategy	The results or strategies included in the following sections of this FSP contribute to achieving this objective: 4.2.2 Wildlife 4.2.3 Water , Fish, Wildlife and Biodiversity within Riparian Areas 4.2.5 Wildlife & Biodiversity - Landscape Level 4.2.6 Wildlife & Biodiversity – Stand Level

**4.1.4 General Biodiversity (KLRMP Objective 2.1.3.1)**

Objective	To conserve the diversity and abundance of native species and their habitats throughout the Kamloops LRMP.
Applicable Area:	Within the FDU.
Result or Strategy	The results or strategies included in the following sections of this FSP are the results or strategies for this objective: 4.1.3 Old Growth Management 4.2.2 Wildlife 4.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Areas 4.2.5 Wildlife & Biodiversity - Landscape Level 4.2.6 Wildlife & Biodiversity – Stand Level

**4.1.5 Inland Fisheries (KLRMP Objective 2.1.5)**

Objective(s)	Maintain a mosaic of angling opportunities within the recreational spectrum (ie. walk-in lakes, drive-to lakes, trophy lakes).
Applicable Area:	Within the FDU.
Result or Strategy	Approach to Harvesting and Roads If the Holder of this FSP carries out primary forest activities within the lakeshore management zone, the Holder will: <ul style="list-style-type: none"> <li>a) Ensure that these activities are carried out in a manner that is consistent with the harvesting guidelines included in the “<i>Clearwater Forest District</i></li> </ul>

	<i>Lakes Local Resource Use Plan – Lakeshore Management Guidelines dated August 1, 2001”.</i>
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#### 4.1.6 Range (KLRMP Objective 2.1.10)

Objective	Minimize tree/grass/cattle conflicts through integrated management practices.
Applicable Area:	Within the FDU where range licenses occur.
Strategy	Approach to Harvesting and Roads
Definitions:	<p><b>Significant Cattle Damage</b> means damage to trees, within a cutblock to which the Stocking Standards included in this FSP apply, that:</p> <ol style="list-style-type: none"> <li>was caused by cattle; and</li> <li>has affected or is likely to affect the ability of those trees or the area on which those trees are located to conform with the requirements of this FSP or otherwise become free growing in accordance with FRPA.</li> </ol>
Strategy:	<ol style="list-style-type: none"> <li>The Holder of this FSP will complete a notification to the Range Tenure Holder: <ol style="list-style-type: none"> <li>When harvest operations are planned within the area of an active Range Tenure,: <ol style="list-style-type: none"> <li>provide <b>notification</b> to the appropriate range tenure holder and inform them of the: <ul style="list-style-type: none"> <li>proposed location of roads and cutblocks,</li> <li>proposed location of road deactivation,</li> <li>schedule of industrial activities;</li> </ul> </li> </ol> </li> <li>that are related to management of cattle by the range tenure holder.</li> </ol> </li> <li>In the case of identification of Significant Cattle Damage; <ol style="list-style-type: none"> <li>The holder of this FSP will contact the Range Tenure Holder and develop an agreement to manage the range use issue.</li> <li>Where agreement cannot be reached, agreed on actions are not carried out by the Range Tenure Holder, or seedling performance continues to be affected, the holder of this FSP will: <ol style="list-style-type: none"> <li>apprise the Designated Decision Maker of the situation, and</li> <li>complete a regeneration survey and based on the results consider an amendment to the Site Plan that will require District Manager approval.</li> </ol> </li> </ol> </li> <li>The Holder of this FSP will, upon being notified by Government that there is a new Range Tenure overlapping the FDU, apply part 1 of this Strategy to these new Range Licences.</li> </ol>

#### 4.1.7 Wildlife (KLRMP Objective 2.1.12)

Objective	Ensure habitat needs of all naturally occurring wildlife species are provided for. Special attention will be paid to those red and blue listed species as defined by BC Environment, and species designated as regionally important (eg. Mule Deer).
Applicable Area:	Within the FDU
Result or Strategy	<p>The results or strategies included in the following sections of this FSP are the results or strategies for this objective:</p> <ol style="list-style-type: none"> <li>4.1.3 Ecosystem Management</li> <li>4.2.2 Wildlife</li> <li>4.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Areas</li> <li>4.2.5 Wildlife &amp; Biodiversity - Landscape Level</li> <li>4.2.6 Wildlife &amp; Biodiversity – Stand Level</li> </ol>

#### 4.1.8 Critical Deer Winter Range (KLRMP Objective 2.1.12.1)

Objective	<p>1) Maintain or enhance forage production and habitat requirements in critical deer winter range.</p> <p>2) Disperse the timber harvest throughout the winter range and spread it out evenly over the rotation.</p> <p>3) Maintain at least 25% of forested area in thermal cover. Link thermal cover units together with suitable travel corridors, especially mature Douglas-fir vets on ridges.</p>
	There is no Critical Deer Winter Range in the CFA operating area.

#### 4.1.9 Critical Moose Winter Range (KLRMP Objective 2.1.12.2)

Objective	<p>1) Maintain thermal and visual cover for moose. Enhance browse production.</p> <p>2) Maintain suitable forest cover attributes with respect to thermal cover and forage production.</p>
	There is only a small 56 ha. overlap of Critical Moose Winter Range with the CFA_K2A operating area (see the Lo Lo FDU Map included in Appendix D).
Definitions	<p>"<b>Permanent Roads</b>" means main haul roads that will be maintained over time.</p> <p>"<b>Moose Forage</b>" means palatable species of plants that are a food source for Moose. These plants include Salix sp., red osier dogwood and Betula sp.</p> <p>"<b>Moose Winter Range</b>" means the area identified on the Lo Lo FDU Map included in Appendix D.</p> <p>"<b>Moose Management Unit</b>": an area that includes a <b>habitat element</b> and a 200 meter zone that begins at the outer edge of the <b>Habitat element</b>.</p> <p>"<b>Habitat element</b>": Lakes, classified wetlands and deciduous leading stands &gt;3ha in size found within the <b>Critical Moose Winter Range</b>.</p> <p>"<b>Critical Moose Winter Range</b>": an area of Crown land identified as <b>Critical Moose Winter Range</b> in Kamloops HLP Ministerial order dated January 8, 2009.</p> <p>"<b>Thermal Cover</b>" means forest that is conifer leading, &gt;15m. in height, and ≥5 ha in size (Moose and Watershed Stewardship Pilot)</p> <p>"<b>Visual Screening</b>" means vegetation and/or topography providing visual obstruction that makes it difficult to see into adjacent areas from the road prism.</p>
Strategy	<p><b>Approach to Harvesting and Roads</b></p> <p>If the holder of this FSP carries out primary forest activities within an area in the FDU that is in Moose Winter Range, the holder will:</p> <ol style="list-style-type: none"> <li>to the extent allowed in FSP Stocking Standards, pursue mixed forest management with similar species distribution to natural stands (including deciduous),</li> <li>within <b>Moose Winter Range</b>, retain at least 40% of the forested area in <b>Thermal Cover</b> condition,</li> <li>where present, retain <b>Visual Screening</b> along those <b>Permanent Roads</b> that are located within 100 metres of a <b>Moose Management Unit</b>, and</li> <li>retain <b>Moose Forage</b> during silviculture activities (including brushing, weeding and stand tending) unless retaining <b>Moose Forage</b> impedes the ability of a stand to reach free growing status.</li> </ol>

#### 4.1.10 Visually Sensitive Areas (KLRMP Objective 2.1.14.1)

Objective	1) The primary objective in Visually Sensitive Areas is to ensure that the levels of visual quality expected by society are achieved on crown land in keeping with the concepts and principles of integrated resource management.
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	2) Areas outside the Visually Sensitive Areas in the Kamloops LRMP are managed for landscape values as follows: alterations may dominate the characteristic landscape but must borrow from natural line and form to such a scale that they are compatible to natural disturbances.
Applicable Area:	Within the FDU.
Strategy	The Result or Strategy included in Section 4.2.7 of this FSP is the Strategy for the purpose of these Objectives.

**4.1.11 Cultural and Heritage Sites (KLRMP Objective 2.1.16)**

Objective	Undertake archaeological assessments in all High and Medium Potential areas identified in the Archaeological Overview Assessment.
Applicable Area:	Within the FDU.
Result or Strategy	The Result or Strategy included in Section 4.2.8 of this FSP is the Strategy for the purposes of this Higher Level Plan Objective.

**4.1.12 Settlement Resource Management Zone (KLRMP 2.2)**

Objective	Manage land within community growth boundary to meet the objectives set out in approved community land use plans.
Applicable Area:	Within the FDU where it overlaps with the District of Clearwater (Municipality).
Strategy	
Approach to Harvest and Road:	<p>Before harvesting of a cutblock or construction of a road to which this FSP applies, and where these plans are located within the Settlement area, the holder of this FSP will:</p> <ol style="list-style-type: none"> <li>1) Provide a Notification to the District of Clearwater to ensure consistency with Community Plans and Objectives.</li> <li>2) Refer to the District of Clearwater Community Wildfire Protection Plan for strategic guidance in planning primary forest activities.</li> </ol>



## 4.2 Objectives Prescribed under section 149(1) of the Act

### 4.2.1 Soils (FPPR s.5)

Objective	The objective set by government for soils is, without unduly reducing the supply of timber from British Columbia's forests, to conserve the productivity and the hydrologic function of soils.
Applicable Area:	Within the FDU.
Result or Strategy	
Definitions:	<p><b>“temporary access allowance”</b> (TAA) means the percentage of a standard unit as determined by the following equation:</p> $\text{TAA} = 12\% - (\text{Permanent Access Structure \% or } 7\%; \text{ whichever is less}).$
General Soil Conservation Result	The holder of this FSP adopts as a result, for activities of that holder that the FSP applies to, sections 35(1), 35(3), 35(5), and 36 of the FPPR as they are amended from time to time.
Exceeding Soil Disturbance Limits	<p>A Holder of this FSP may cause soil disturbance that exceeds the limits specified in section 35(3) of the FPPR, as adopted as a result under this FSP, if that Holder is:</p> <p>(a) removing infected stumps or salvaging windthrow and the additional disturbance is the minimum necessary;</p> <p>(b) constructing a temporary access structure in an area not referred to in subparagraph (c) and both of the following apply:</p> <p style="padding-left: 40px;">(i) the limit set out in section 35(3) of the FPPR, as adopted as a result or strategy under this FSP, is not exceeded by more than the <b>temporary access allowance (TAA)</b>, excluding the area covered by a roadside work area; and</p> <p style="padding-left: 40px;">(ii) before the regeneration date, a sufficient amount of the area within the standards unit is rehabilitated such that the Holder is in compliance with the limits set out in section 35(3) of the FPPR, as adopted as a result or strategy under this FSP; or</p> <p>(c) constructing a temporary access structure:</p> <p style="padding-left: 40px;">(i) within a standard unit with a net area to be reforested that is less than 10 ha,</p> <p style="padding-left: 40px;">(ii) within a standard unit that is not predominantly comprised of sensitive soils; and</p> <p style="padding-left: 40px;">(iii) before the regeneration date, a sufficient amount of the area within the standards unit is rehabilitated such that the Holder is in compliance with the limits set out in section 35(3) of the FPPR, as adopted as a result or strategy under this FSP.</p>
Work Related to Rehabilitation	<p>A Holder of this FSP who rehabilitates an area of temporary access structure or an area described in section 35(5) of the FPPR, as adopted as a result under this FSP, must:</p> <p>(a) remove or redistribute woody materials that are exposed on the surface of the area and are concentrating subsurface moisture, to the extent necessary to limit the concentration of subsurface moisture on the area;</p> <p>(b) de-compact compacted soils;</p> <p>(c) return retrievable displaced soils where practicable; and</p>

	<p>(d) where erosion of exposed soil from the area would cause sediment to enter a stream, wetland, or lake, or cause a material adverse effect in relation to one or more of the subjects listed in section 149(1) of the Act, the Holder, unless placing debris or revegetation would not materially reduce the likelihood of erosion, must:</p> <ul style="list-style-type: none"> <li>(i) place woody debris on the exposed soils, or</li> <li>(ii) revegetate the exposed mineral soils.</li> </ul>
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#### 4.2.2 Wildlife (FPPR s.7)

Objective	<p>(1) The objective set by government for wildlife is, without unduly reducing the supply of timber from British Columbia's forests, to conserve sufficient wildlife habitat in terms of amount of area, distribution of areas and attributes of those areas, for</p> <ul style="list-style-type: none"> <li>(a) the survival of species at risk,</li> <li>(b) the survival of regionally important wildlife, and</li> <li>(c) the winter survival of specified ungulate species.</li> </ul> <p>(2) A person required to prepare a forest stewardship plan must specify a result or strategy in respect of the objective stated under subsection (1) only if the minister responsible for the Wildlife Act gives notice to the person of the applicable</p> <ul style="list-style-type: none"> <li>(a) species referred to in subsection (1), and</li> <li>(b) indicators of the amount, distribution and attributes of wildlife habitat described in subsection (1).</li> </ul>
Applicable Area:	Within the FDU.
Background	<ol style="list-style-type: none"> <li>1. Within the FDU, there is no notice that has been provided under Section 7(2) of the FPPR for the survival of species at risk or the survival of regionally important wildlife. There is no Mt. Goat winter range that overlaps the FDU.</li> <li>2. The Conservation Data Centre (CDC) indicates 2 occurrence reports that overlap the FDU. These include: <ul style="list-style-type: none"> <li>• American Badger</li> <li>• Caribou – Southern Mountain Population</li> </ul> </li> <li>3. The KLRMP Order identifies Objectives for management of the Critical Habitat of Moose. A Strategy for these objectives is included in Section 4.1.9 of this FSP.</li> </ol>
Strategy	<p>The holder of this FSP adopts as a strategy, for activities of that holder that the FSP applies to:</p> <ol style="list-style-type: none"> <li>1) Primary forest activities will be consistent with the applicable <i>Accounts and Measures for Managing Identified Wildlife</i> provided at the following website: <a href="http://www.env.gov.bc.ca/wld/frpa/iwms/accounts.html#eighth">http://www.env.gov.bc.ca/wld/frpa/iwms/accounts.html#eighth</a>.</li> <li>2) Since the information at the CDC is updated from time to time, the holder of the WLP will refer to this website (<a href="http://maps.gov.bc.ca/ess/hm/cdc/">http://maps.gov.bc.ca/ess/hm/cdc/</a>) prior to conducting harvesting activities and timber harvest may be modified to be consistent with the Accounts and Measures for Managing Identified Wildlife for any newly identified species at risk.</li> </ol>

#### 4.2.3 Water, Fish, Wildlife and Biodiversity within Riparian Areas (FPPR s.8)

Objective	The objective set by government for water, fish, wildlife and biodiversity within riparian areas is, without unduly reducing the supply of timber from British Columbia's forests, to conserve, at the landscape level, the water quality, fish habitat, wildlife habitat and biodiversity associated with those riparian areas.
Applicable Area:	Within the FDU.
Result or Strategy	
General Conservation of Values within Riparian Areas:	The Holder of this FSP adopts as a result or strategy, for activities of that Holder to which this FSP applies, sections 47 - 51, 52(2) and 53 - 57 of the FPPR as it is amended from time to time.
Definitions:	<p><b>“Affected Area”</b> means:</p> <ul style="list-style-type: none"> <li>a) for a stream, the area of crown forest land in the riparian management zone <ul style="list-style-type: none"> <li>i. within a cutblock to which this FSP applies; and</li> <li>ii. associated with the stream for a distance of 500metres (slope distance) or to a stream class boundary, whichever is less, both upstream and downstream from the area identified in (i);</li> </ul> </li> <li>b) for a lake or wetland, where a cutblock to which this FSP applies is located within the riparian management zone of the lake or wetland, the entire riparian management zone of the lake or wetland, both within and outside of the cutblock.</li> </ul> <p><b>“Contributing Area”</b> means the following area within the Affected Area:</p> <ul style="list-style-type: none"> <li>a) an area indicated on forest cover maps or field verified as being age class 3 or greater and is not located within an existing or planned cutblock, and</li> <li>b) an area not planned for harvest within an existing or planned cutblock that is indicated on forest cover maps as being age class 3 or greater, and</li> <li>c) an area resulting from the following formula:</li> </ul> <p style="padding-left: 40px;">Area = the sum of areas [(Area of harvest or planned harvest) x (proportion of basal area retained or planned for retention)]. This calculation determines the amount of area that is contributed by individual tree retention located in areas that are not age class 3 or greater.</p> <p style="padding-left: 40px;">Contributing Area = the sum of a) + b) + c).</p> <p><b>“Basal Area Retention”</b> means the percent of the affected area retained as contributing area, as determined from the following equation:</p> <p style="padding-left: 40px;">Basal Area Retention (%) = Contributing Area/Affected Area x 100</p>

Retention in a Riparian Management Zone	<p>For the purposes of FPPR Section 52(1), the Holder of this FSP, harvesting a Cutblock to which this FSP applies, that includes a Riparian Management Zone will not cause retentions in the Affected Area, at the completion of harvest, to be less than the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2">Riparian Class</th> <th colspan="2">Riparian Management Area (m)</th> <th colspan="2">Riparian Management Zone (RMZ) Basal Area Retention (%)</th> </tr> <tr> <th>RRZ</th> <th>RMZ</th> <th>Low Windthrow Risk</th> <th>Moderate and High Windthrow Risk</th> </tr> </thead> <tbody> <tr><td>S1-A</td><td>0</td><td>100</td><td>≥25</td><td>0-100</td></tr> <tr><td>S1-B</td><td>50</td><td>20</td><td>≥25</td><td>0-100</td></tr> <tr><td>S2</td><td>30</td><td>20</td><td>≥25</td><td>0-100</td></tr> <tr><td>S3</td><td>20</td><td>20</td><td>≥25</td><td>0-100</td></tr> <tr><td>S4</td><td>0</td><td>30</td><td>≥25</td><td>0-100</td></tr> <tr><td>S5</td><td>0</td><td>30</td><td>≥10</td><td>0-30</td></tr> <tr><td>S6</td><td>0</td><td>20</td><td>0-20</td><td>0-20</td></tr> <tr><td>W1</td><td>10</td><td>40</td><td>≥10</td><td>0-30</td></tr> <tr><td>W3</td><td>0</td><td>30</td><td>≥10</td><td>0-30</td></tr> <tr><td>W5</td><td>10</td><td>40</td><td>≥10</td><td>0-50</td></tr> <tr><td>L1-A</td><td>0</td><td>0</td><td>≥10</td><td>0-30</td></tr> <tr><td>L1-B</td><td>10</td><td>0</td><td>≥10</td><td>0-30</td></tr> <tr><td>L3</td><td>0</td><td>30</td><td>≥10</td><td>0-30</td></tr> </tbody> </table> <p>Reducing basal area retention below Low Windthrow Risk levels, based on the determination of a moderate or high windthrow hazard, will comply with recommendations made by a Qualified Registered Professional.</p>	Riparian Class	Riparian Management Area (m)		Riparian Management Zone (RMZ) Basal Area Retention (%)		RRZ	RMZ	Low Windthrow Risk	Moderate and High Windthrow Risk	S1-A	0	100	≥25	0-100	S1-B	50	20	≥25	0-100	S2	30	20	≥25	0-100	S3	20	20	≥25	0-100	S4	0	30	≥25	0-100	S5	0	30	≥10	0-30	S6	0	20	0-20	0-20	W1	10	40	≥10	0-30	W3	0	30	≥10	0-30	W5	10	40	≥10	0-50	L1-A	0	0	≥10	0-30	L1-B	10	0	≥10	0-30	L3	0	30	≥10	0-30
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**4.2.4 Water in Community Watersheds (FPPR s8.2)**

Objective	<p>The objective set by government for water being diverted for human consumption through a licensed waterworks in a community watershed is to prevent the cumulative hydrological effects of primary forest activities within the community watershed from resulting in:</p> <ul style="list-style-type: none"> <li>(a) a material adverse impact on the quantity of water or the timing of the flow of the water to the waterworks, or</li> <li>(b) the water from the waterworks having a material adverse impact on human health that cannot be addressed by water treatment required under <ul style="list-style-type: none"> <li>(i) an enactment, or</li> <li>(ii) the licence pertaining to the waterworks.</li> </ul> </li> </ul>
Applicable Area:	<p>Within the FDU and specifically the Russell, Haschaek, MacDougal Community Watershed.</p>

Strategy	
Definitions:	<b>Equivalent Clearcut Area (ECA) above the H60 line</b> – harvested and naturally disturbed area, adjusted for hydrologic recovery <sup>1</sup> achieved through regeneration, as a proportion of the area of a watershed located above an elevational line where 60% of the watershed area is above. In theory this line represents where the snowline is at the time of “peak flow” on the main stem channel at the point of interest.
Strategy for Harvest and Road Construction:	<p>The Holder of this FSP will adopt sections 59 through 61 of the FPPR as they are amended from time to time.</p> <p>Prior to harvest and road construction within a Designated Community Watershed the Holder will:</p> <ol style="list-style-type: none"> <li>provide a notification to the water purveyor;</li> <li>where an “equivalent clearcut area above the H60 line” exceeding 25%, complete a watershed assessment by a Qualified Registered Professional that addresses the Government Objective (above);</li> <li>ensure that primary forest activities are planned and comply with the assessment recommendations.</li> <li>Complete reassessment every 5 years.</li> </ol> <p>The Holder of this FSP will complete road inspections to monitor sediment sources and prescribe maintenance or deactivation activities designed to minimize sediment delivery to streams. Road inspections will be scheduled according to risk:</p> <ol style="list-style-type: none"> <li>High Risk - annual inspections or after a large storm cycle.</li> <li>Medium Risk - biannual inspection</li> <li>Low Risk - inspection every 5 years.</li> </ol> <p>Road risk has/will been/be determined by a Qualified Registered Professional.</p> <p>The holder of this FSP is not responsible for road use, inspection and maintenance carried out by others that hold Road Use Permit on the Hascheak FSR.</p>

**4.2.5 Wildlife and Biodiversity - Landscape Level (FPPR s.9)**

Objective	The objective set by government for wildlife and biodiversity at the landscape level is, without unduly reducing the supply of timber from British Columbia's forests and to the extent practicable, to design areas on which timber harvesting is to be carried out that resemble, both spatially and temporally, the patterns of natural disturbance that occur within the landscape.
Applicable Area:	Within the FDU.
Result or Strategy	
Approach to Harvest and Road:	When the Holder of this FSP carries out primary forest activities, the Holder will comply with Sections 64 and 65 of the FPPR.

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<sup>1</sup> Extension Note 116, September 2015, Revised Snow Recovery Estimates for Pine Dominated Forests in Interior British Columbia, R. Winkler & S. Boon.

	<p><i>The smaller landbase of the CFA_K2A does not align with the analysis unit (Landscape Unit) used for assessment of Patch Size Distribution. Nevertheless, the Kamloops TSA Analysis of the Clearwater and Raft Landscape Units will be utilized as it is updated from time to time. The last update to the Clearwater LU was “Patch Size Distribution Analysis – Clearwater Landscape Unit/Kamloops TSA, February 14, 2020, Forsite Consulting Ltd.” Given early seral stage is represented by 2 – 20 year age classes (0-20, 21-40 yrs), it is not unreasonable to expect that this update should be replaced in 10 years; ½ of the age class interval.</i></p>
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**4.2.6 Wildlife and Biodiversity – Stand Level (FPPR s. 9.1)**

Objective	The objective set by government for wildlife and biodiversity at the stand level is, without unduly reducing the supply of timber from British Columbia's forests, to retain wildlife trees.
Applicable Area:	Within the FDU.
Strategy	
Definitions:	<p><b>“Wildlife Tree Retention”</b> means the area composed of either of the following or a combination of them:</p> <ul style="list-style-type: none"> <li>(i) a wildlife tree retention area; and</li> <li>(ii) the area of wildlife trees retained within a Cutblock based on the following formula:  <math display="block">\text{Area} = (\text{gross block area of the cutblock}) * (\text{basal area reserved from harvesting}) / (\text{Original basal area of the Cutblock})</math> </li> </ul> <p><b>“WTR Zone”</b> means the area defined on the map in Appendix B as the eligible WTR landbase. This area is the result of a GIS delineation of existing Reserves; OGMA, Old Forest Polygon, Riparian Reserves and current WTRA's, buffered by the 500m dash distance discussed in the Biodiversity Guidebook.</p>
Wildlife Tree Retention:	A Holder of this FSP who harvests timber in the WTR Zone to which this FSP applies will comply with FPPR S. 66. Strategies included in sections 4.1.8, 4.1.9, 4.2.3 and 4.2.7 contribute to achieving Wildlife Tree Retention (Stand Level) Objectives.
Restrictions on Harvesting Wildlife Tree Retention	<p>A Holder of this FSP will not harvest Wildlife Tree Retention it has provided unless:</p> <ul style="list-style-type: none"> <li>(a) the trees on the net area to be reforested of the cutblock to which the Wildlife Tree Retention relates have developed attributes consistent with a mature seral condition; or</li> <li>(b) the Holder of this FSP specifies in a site plan an area, number of trees or habitat that is equivalent to the portion of the Wildlife Tree Retention from which timber is to be harvested; and</li> <li>(c) the harvesting is: <ul style="list-style-type: none"> <li>(i) for the purpose of maintaining a road;</li> <li>(ii) to reduce fuel hazard in the Wildland Urban Interface; or</li> <li>(iv) required for safety reasons.</li> </ul> </li> </ul>

#### 4.2.7 Visual Quality (FPPR s. 9.2)

Objective	The objective set by government in relation to visual quality for a scenic area, that (a) was established on or before October 24, 2002, and (b) for which there is no visual quality objective is to ensure that the altered forest landscape for the scenic area: (c) in visual sensitivity class 1 is either the preservation or retention category, (d) in visual sensitivity class 2 is either the retention or partial retention category, (e) in visual sensitivity class 3 is either the partial retention or modification category, (f) in visual sensitivity class 4 is either the partial retention or modification category, and (g) in visual sensitivity class 5 is either the modification or maximum modification category.
From KLRMP Objective 2.1.14.1	a) In the Visually Sensitive Area, levels of visual quality expected by society are achieved on Crown land in keeping with the concepts and principles of integrated resource management.  b) Outside of the Visually Sensitive Area, landscape alterations may dominate the characteristic landscape but must borrow from natural line and form to such an extent and on such a scale that they are comparable to natural occurrences.
Applicable Area:	<b>Scenic Area Inside and Outside of a Visually Sensitive Area</b>
Result	In relation to a visual quality objective, the result for the identified FDU is:  i) that a planned cutblock or road will be designed and implemented to comply with the category of visually altered forest landscape (as set out in section 1.1 of the Forest Planning and Practices Regulation as it is amended from time to time) applicable to the visual quality objective <sup>2</sup> illustrated on the FDU Maps included in Appendix 1 of this FSP.
	<b>Areas Not Visually Sensitive and Outside of the Scenic Area</b>
Applicable Area:	Area outside of the identified visually sensitive areas within the FDU (See Figure 5 of KLRMP 2.1.14.1) and not within the Scenic Area.
Result or Strategy	Within an area in the FDU that is outside of the identified Visually Sensitive Area and not within the Scenic Area, the Holder of this FSP will only carry out primary forest activities if the Holder ensures that the design of the cutblock or road is consistent with mimicking naturally occurring landscape characteristics with a variety of openings (in size, shape and distribution), by following natural boundaries, lines and forms such as ridges, creeks, draws, rock outcrops or timber types, to ensure naturally appearing boundaries.

<sup>2</sup> As determined by relating the VSC Final Value to rVQO in the Visual Landscape Inventory approved for this area.



#### 4.2.8 Cultural Heritage Resources (FPPR s.10)

Objective	The objective set by government for cultural heritage resources is to conserve, or, if necessary, protect cultural heritage resources that are: (a) the focus of a traditional use by an aboriginal people that is of continuing importance to that people, and (b) not regulated under the Heritage Conservation Act.
Applicable Area:	Within the FDU.
Strategy	
Definitions:	<p>“<b>affected First Nation</b>” refers to those First Nations with interest within an area as defined by the Consultative Areas Database or as determined by the District First Nations Liaison Officer.</p> <p>“<b>cultural heritage resource</b>” refers only to those resources that are the focus of a traditional use by an aboriginal people that are of continuing importance to that people, and not regulated under the <i>Heritage Conservation Act</i>.</p> <p>A “<b>cultural heritage resource evaluation</b>” (CHRE) is a process conducted by a qualified person and consisting of the following steps:</p> <ol style="list-style-type: none"> <li>i. Complete a <b>notification</b> to the <b>affected First Nations</b> to identify cultural heritage resources.</li> <li>ii. Record the location of cultural heritage resource identified by First Nations.</li> <li>iii. A qualified person will evaluate the impacts of the planned forest harvesting or road building activity on the cultural heritage resource.</li> <li>iv. The qualified person will prepare recommendations to mitigate the impact on, conserve or, if necessary, protect, the cultural heritage resource considering: the relative value or importance of the cultural heritage resource to a traditional use by an aboriginal people; the relative abundance or scarcity of the cultural heritage resource; the historical extent of the traditional use of the cultural heritage resource; and, the impact that conserving or protecting the cultural heritage resource has on the agreement holder’s timber harvesting rights.</li> <li>v. Communicate the outcomes of this evaluation to the First Nation in whose affected traditional territory the area lies as well as MOFLNRORD.</li> </ol> <p>A "<b>qualified person</b>" is an individual who has the necessary training, ability and experience that makes the person competent to carry out the CHRE. This person is either authorized by the affected First Nation or is a Qualified Registered Professional.</p>
Strategy for Conservation or Protection of Cultural Heritage Resources:	In relation to the objective set by government for cultural heritage resources set out in the section 10 of the FPPR, the strategies that apply to the FDU are: (a) The Holder of this FSP will complete a <b>notification</b> of road construction and harvest plans to <b>affected First Nation</b> bands, seeking information related to the existence or potential existence of cultural heritage resources (CHRs) in the area where roads or cutblocks are planned. This notification will be completed at least 30 days prior to commencement of these activities.



	<p>(b) Prior to the construction of a road or harvest of a cutblock, the Holder of this FSP will conduct a Cultural Heritage Resource Evaluation (CHRE), for the area being planned for road construction and harvest, if:</p> <ol style="list-style-type: none"> <li>i. a cultural heritage resource is identified that has not been previously evaluated, or</li> <li>ii. site specific information regarding a cultural heritage resource is brought to the attention of the Holder of this FSP by First Nations, government employees or other individuals.</li> </ol> <p>(c) In the case that construction of a road or harvest of a cutblock is located in an area described by (ii), and a First Nation advises the Holder of the FSP that a CHRE is not required, then a CHRE will not be carried out.</p> <p>(d) In the case where the affected First Nation does not respond to the referral and the location of the CHR is identified in accordance with part (b) of this strategy, the Holder of this FSP will have a CHRE completed by a qualified person.</p> <p>The Holder of this FSP will implement the recommendations that are communicated in the CHRE.</p> <p>(e) If a previously unidentified CHR is encountered by the Holder of this FSP while conducting a primary forest activity, operations will cease or be modified to protect the resource until a CHRE can be carried out. MOFLNRORD and <b>affected First Nations</b> will be contacted and a CHRE will be completed. Operations will recommence once the site plan complies with recommendations made in the CHRE.</p>
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#### 4.2.9 Recreation Sites and Trails (Objective Grandfathered FRPA 180, 181)

Objective	Manage known recreation sites and trails in accordance with established objectives.
Applicable Area:	Within the FDU.
Result or Strategy	
Approach to Roads and Harvest	<p>Prior to the Holder of this FSP carrying out primary forest activities in an area of the FDU that is known to have a Recreation Site or Trail designation, the Holder will:</p> <ul style="list-style-type: none"> <li>• provide a <b>notification</b> to the MOFLNRORD District Recreation Officer.</li> <li>• comply with conditions communicated in the Section 16 authorization.</li> </ul>

Note that at the time of writing this FSP there were the following Recreation Features located within the K2A FDU:

- REC5823 – Clearwater Demonstration Forest
- REC192256 – Candle Creek XC Ski Trails
- REC4599 – Raft River Falls
- REC240810 – Raft Mountain Snowmobile Trail; stakeholder is Clearwater Snodrifters
- REC4527 – Raft Mountain
- REC154925 – Foghorn-Harp Snowmobile Trails

## 5.0 Measures to Prevent the Introduction or Spread of Invasive Plants (Act s.47 and FPPR s. 17)

The following measures will be taken to prevent the introduction or spread of Invasive Plants:

### Assessment

- a) before the FSP Holder carries out or authorizes primary forest activities within an FDU, the FSP Holder will check the provincial Invasive Alien Plant Program (IAPP) for the presence of invasive plant species in the area proposed for development;
- b) Ensure that all staff and contractors working within the agreement area are familiar with the list of potential invasive plants, and can identify these species in the field. This will be achieved by providing field identification materials available at the IAPP as part of prework meeting materials.

### Reporting

- a) report new invasive plant infestation sites within one year of discovery through the provincial Invasive Alien Plant Program (IAPP) Application.

### Prevention of Introduction and Spread

- a) Minimize soil disturbance in riparian areas by adhering to Section 4.2.3 of this Forest Stewardship Plan. Such action is intended to maintain riparian areas in a state that is less suitable for the establishment of invasive plants.
- b) Where safe and practicable, retain natural regeneration and understory vegetation at all stages of primary forest activity to prevent the creation of disturbance that is suitable for the establishment of invasive plants.
- c) Where exposed soil is created through road construction or harvest activities (>0.01ha in size), seed the exposed soil within 1 year of completion of forest operations. Road running surface will be included in the area requiring seeding unless further use of the road is planned within 24 months of seeding operations. This action is intended to reduce the area of ground suitable for colonization by invasive plants.
- d) Use seed which meets or exceeds Canada Common No.1 Forage Mix specifications stated in the Canada Seeds Act to ensure that invasive species are not introduced through seeding activities.
- e) Request a Certificate of Seed Analysis for all seed mixes to be purchased and reject those that contain invasive plant material.
- f) Monitor the areas that were seeded in c) one year after application and repeat additional seeding if revegetation has not been achieved (<75% coverage). Complete this re-seeding in the next period of time where efficacy of seeding would be expected to be good.
- g) Take precautions to prevent the spread of invasive plants if such species are identified on a worksite. Such precautions will include changing the season of operation, cleaning equipment (with or without water) following completion of work at each affected worksite, and avoiding the location of landings or storage areas where invasive plants are present.

## 6.0 Measures to Mitigate the Effect of Removing or Rendering Ineffective Natural Range Barriers (FPPR s.18)

The following measures will be taken in all FDU areas that contain or are adjacent to range tenures, to mitigate the effect of removing or rendering ineffective natural range barriers that are being relied upon pursuant to range tenures inside or immediately adjacent to the FDU:

### **Definitions**

**Natural Range Barrier:** a river, a rock face, dense timber or other naturally occurring feature that stops or significantly impedes livestock movement to and from an adjacent area.<sup>3</sup>

**Measures:** Before carrying out or authorizing primary forest activities, the FSP Holder will:

- a) Complete a notification to the range tenure holder before carrying out primary forest activities within or adjacent to (within 500m) the range tenure, and request that the range tenure holder identify the location of Natural Range Barriers that may be rendered ineffective by the proposed primary forest activities. If the tenure is unallocated, then this notification will be sent to the MOFNROD.
- b) Where a range tenure holder indicates that primary forest activities may remove or render ineffective a Natural Range Barrier, work with the range tenure holder to develop and implement a strategy for mitigation. Mitigation may include:
  - erecting short drift fences or other appropriate barriers,
  - installing cattle guards or replacement barriers on newly constructed roads, or
  - carrying out other activities that will limit the movement of cattleThe strategy for mitigation will also define who is responsible for implementation as well as when the actions would be completed. Strategies that are developed/implemented will be made available to the MOFLNRORD upon request.
- c) Where a mitigation strategy cannot be agreed to between the FSP Holder and the Range Licence Holder, the MOFLNRORD will be contacted to assist with a resolution.

The FSP Holder is not responsible for on-going maintenance of the replacement barrier.

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<sup>3</sup> Ministry of Forests and Range Definitions of Forestry Terms as referenced in FRPA General Bulletin #21. February 2009

## 7.0 Stocking Standards

### 7.1 GENERAL STANDARDS

Where a holder of this FSP is required under the Act and Regulations to establish a free growing stand in respect of timber harvested under this FSP, the holder will do so in accordance with the Chief Forester Reference Guide for FDP Stocking Standards as it is amended from time to time. These standards are applicable across the entire Forest Development Unit of the K2A. When the stocking standards and variations developed by the Thompson Okanagan Stocking Standards Working Group become available, an amendment will be made to incorporate them into this FSP.

#### 7.1.1 Pre-amble

The standards and criteria included in this FSP support stocking areas with ecologically suitable species that address immediate and long-term forest health issues on the area to a density that (in either case) is consistent with:

- (a) maintaining or enhancing an economically valuable supply of commercial timber from British Columbia's forests;
- (b) the timber supply analysis and forest management assumptions that apply to the area covered by the plan on the **Submission Date**; and
- (c) the application to meet specific objectives (such as broadleaf species management for specific habitat objectives or landscape level representation) that are to service an objective to the benefit of the province and the stakeholder(s), in a manner that is reasonable and worthwhile, in consideration of the trade-offs against timber supply.

#### 7.1.2 Uneven-Aged Stocking Standards (FPPR 16.4, FPPR 44(3)(h, i))

For the term of this FSP, the Holder will **not carry out** commercial thinning, removal of individual trees, or a similar type of intermediate cutting.

#### 7.1.3 Minimum Inter-Tree Distance (MITD)

Unless otherwise specified by this FSP, the MITD defaults to 2.0m for all stocking standards.

**Subject to a post harvest plantability evaluation and where unfavourable stocking conditions have been identified in a Site Plan**, the MITD may be reduced to not less than 1m. to provide an opportunity to advance the level of stocking standard achievement (improve site occupancy) associated with the following:

- Slash - inter tree spacing will be reduced when site preparation is not feasible to reduce slash loading and plantable spots at 2.0m, distance would have a slash depth of >40cm.
- Rock - inter tree distance will be reduced when the planting spot selected has >70% coarse fragments. Site prep will not be considered to reduce rocky conditions.
- Wet areas - inter tree spacing will be reduced where site preparation is not feasible and standing water (pooling) is present during the planting operation or has been identified at the preharvest planning stage.
- Cattle Damage - to place planted trees near obstacles to protect them from damage by cattle.

#### 7.1.4 Characteristics of Residual Mature and Pole Layer Crop Trees

Unless otherwise specified by this FSP, the minimum characteristics of any leave trees, including, form, health and vigor are as per the guideline criteria outlined in Section 7f of *Acceptability guidelines for residual mature and pole layer crop trees* in FS 660-1 HFP 01 and the *Tree Wounding Guidebook*.

### 7.1.5 Broadleaf Free Growing Heights

Unless otherwise specified by this FSP, the broadleaf free growing height will be equal to the tallest conifer height for the site series/ stocking standard ID.

### 7.1.6 Regeneration Delay

Up to a maximum of 7 years regeneration delay is applied to all stocking standards where harvesting has resulted in an obligation to establish a free growing stand. Where harvesting has not resulted in an obligation to establish a free growing stand as a result of commercial thinning, removal of individual trees, or a similar type of intermediate cutting, a two year regeneration is applied. In practice, the most suitable earlier regeneration delay period will be applied considering applicable TSR assumptions, site conditions and operational situations.

### 7.1.7 Maximum Density

Unless otherwise specified by this FSP, the maximum density for interior lodgepole pine leading stands is 25,000 countable stems per hectare. Lodgepole pine leading stands are stands where lodgepole pine is greater than and equal to 80% of the inventory.

Unless otherwise specified by this FSP, the maximum density number for all other conifer species in non-lodgepole pine leading stands and mixed lodgepole pine stands is 10,000 countable stems per hectare. Broadleaf density will not contribute towards stand conifer density reduction thresholds.

Unless otherwise specified by this FSP, no maximum density number is defined for broadleaf tree species. Broadleaf species rapid self-thinning characteristics lend themselves well for natural thinning.

### 7.1.8 Free Growing Damage Criteria

Even aged age class 1 stands: unless otherwise specified by this FSP, at the time of the free growing survey, the following free growing damage criteria will apply: Appendix 5 of *Establishment to Free Growing Guidebook* (revised edition May 2000, Kamloops Forest Region), Appendix 5 of *Establishment to Free Growing Guidebook* (revised edition Version 2.2, May 2000, Vancouver Forest Region) and/or Appendix 5 of *Establishment to Free Growing Guidebook* (version 2.3, Cariboo Forest Region, January 2002).

Uneven-aged stands, layer 3 & 4 advance regeneration: unless otherwise specified by this FSP, at the time of the free growing survey the following free growing damage criteria will apply: Appendix 10, Table A10-1 of the *Establishment to Free Growing Guidebook* (revised edition May 2000, Kamloops Forest Region), Appendix 10, Table A10-1 of the *Establishment to Free Growing Guidebook* (revised edition Version 2.2, May 2000, Vancouver Forest Region) and/ or Appendix 10, Table A10-1 of the *Establishment to Free Growing Guidebook* (version 2.3, Cariboo Forest Region, January 2002).

### 7.1.9 Tree Species Mix

Areas harvested in accordance with this Forest Stewardship Plan will be reforested with the most ecologically suitable species and in accordance with preferred and acceptable species included in the Chief Forester Reference Guide for FDP Stocking Standards as it is amended from time to time.. Factors that will influence the mix of species selected for reforestation includes:

- Forest health factors influencing the specific site identified in the Site Plan.
- Historic log values; where appropriate a species focus will be on the highest historical value.
- To anticipate climate change, the provincial species selection guide will be utilized.
- Consideration for low fuel hazard species to be established in Wildland Urban Interface areas with the District of Clearwater or with values (infrastructure) at risk.

#### **7.1.10 White Pine**

To reduce white pine blister rust infections, non-rust resistant Pw is to be pruned to 1.3 meter height where it is expected to contribute to free growing density.

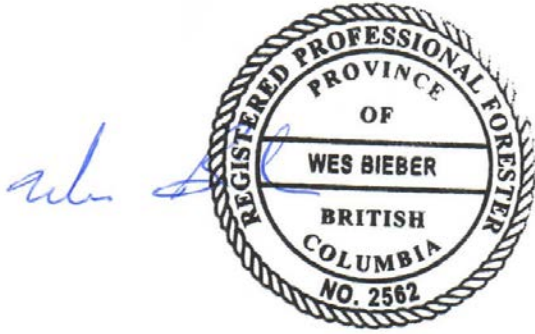
#### **7.1.11 Species Suitability**

Unless specified otherwise in this FSP, the species suitability identified in the even-aged stocking standards applies to the other stocking standards within this FSP.

#### **7.1.12 Root Disease**

A significant portion of the CFA operating area is located in biogeoclimatic zones that are known to have incidence of *Armillaria mellea* and *Phellinus weirii*. These can have significant effect on stand volumes over the rotation. Incidence of these root diseases are mapped during the field layout of harvest plans. These areas will be stumped. Regardless of root disease incidence, in ecosystems that are known to host these root diseases, a mix of ecologically suited species will be established.

## 8.0 Signatures of Preparing Forester and Person Required to Submit Plan

	<p><b>Preparing Forester</b></p> <p><i>“I certify that the work described herein fulfills the standards expected of a member of the Association of British Columbia Forest Professionals and that I did personally supervise the work”</i></p>
<p><b>Wes Bieber, R.P.F.</b> Longfellows Natural Resource Management Solutions Inc. Salmon Arm, B.C.</p>	

On behalf of the holder of Community Forest Agreement K2A

<p><b>George Brcko, R.F.T.</b> General Manager, Wells Gray Community Forest Corporation.</p>	<p><b>Joel Steinberg</b> President</p>

## Appendix A – Forest Development Unit (FDU) Map



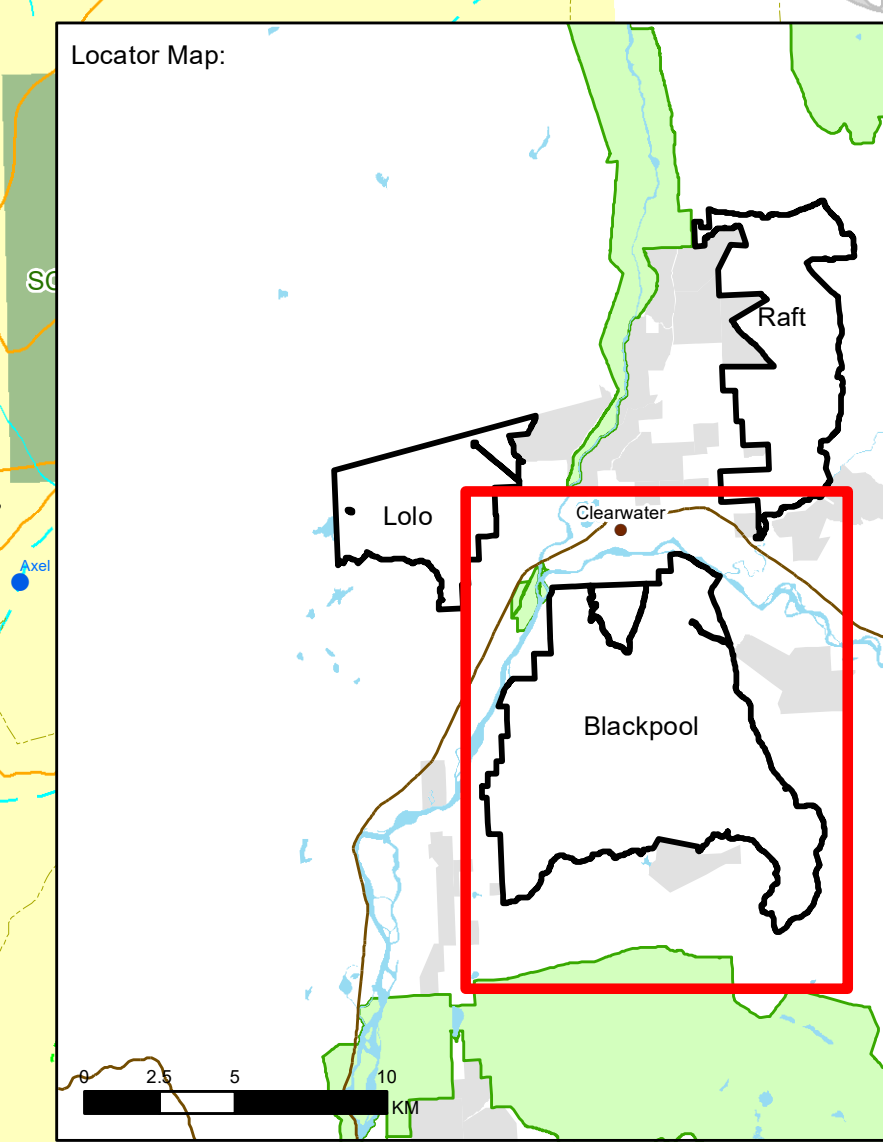
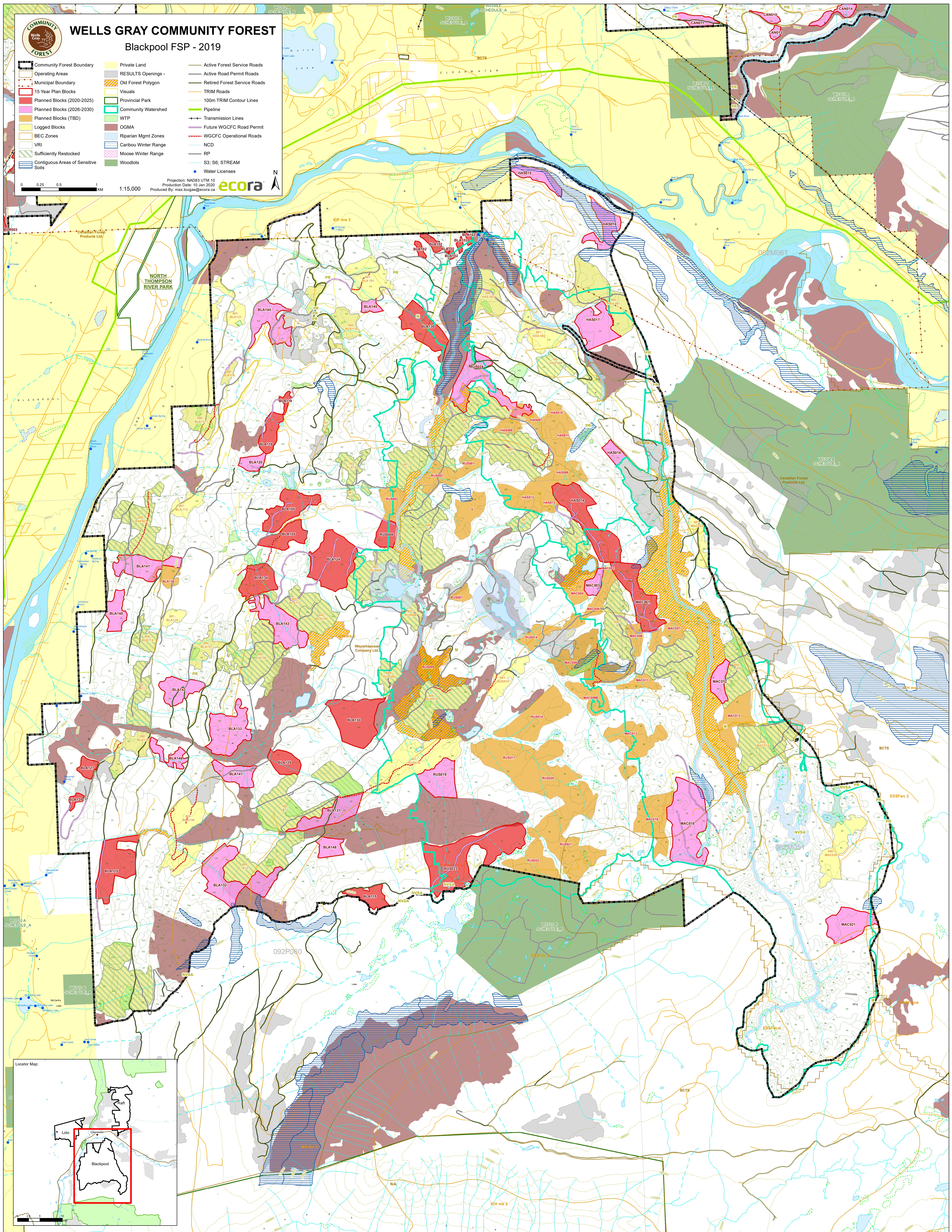


# WELLS GRAY COMMUNITY FOREST

## Blackpool FSP - 2019

	Community Forest Boundary		Private Land		Active Forest Service Roads
	Operating Areas		RESULTS Openings - Old Forest Polygon		Active Road Permit Roads
	Municipal Boundary		Visuals		Retired Forest Service Roads
	15 Year Plan Blocks		Provincial Park		TRIM Roads
	Planned Blocks (2020-2025)		Community Watershed		100m TRIM Contour Lines
	Planned Blocks (2026-2030)		WTP		Pipeline
	Planned Blocks (TBD)		OGMA		Transmission Lines
	Logged Blocks		Riparian Mgmt Zones		Future WGCFC Road Permit
	BEC Zones		Caribou Winter Range		WGCFC Operational Roads
	VRI		Moose Winter Range		NCD
	Sufficiently Restocked		Woodlots		RP
	Contiguous Areas of Sensitive Soils				S3; S6; STREAM
					Water Licenses

Projection: NAD83 UTM 10  
 Production Date: 10 Jan 2020  
 Produced By: max.tougas@ecora.ca





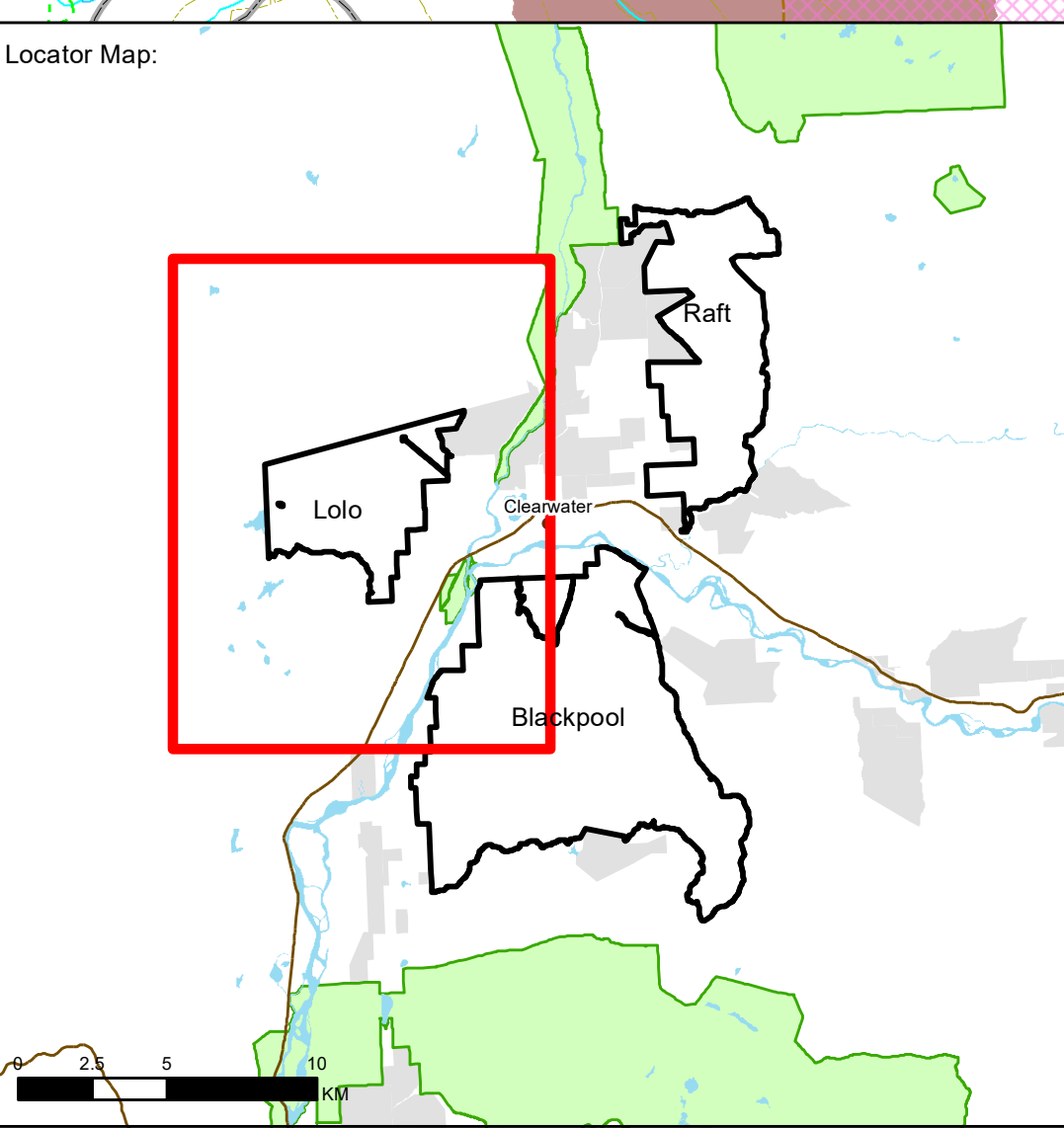
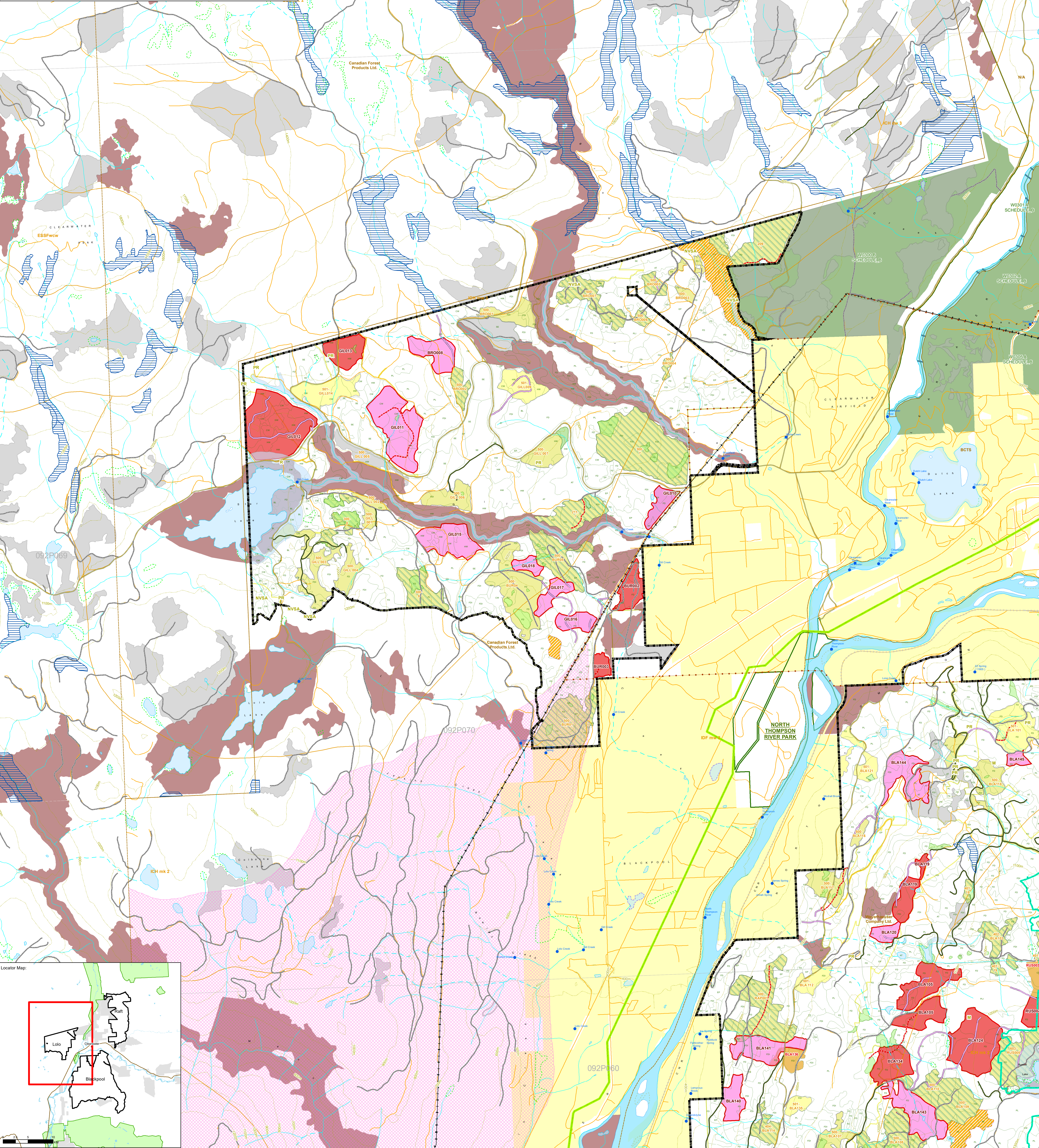


# WELLS GRAY COMMUNITY FOREST

## Lolo FSP - 2019

Community Forest Boundary	Private Land	Active Forest Service Roads
Operating	RESULTS Openings - Old Forest Polygon	Active Road Permit Roads
Municipal Boundary	Visuals	Retired Forest Service Roads
15 Year Plan Blocks	Provincial Park	TRIM Roads
Planned Blocks (2020-2025)	Community Watershed	100m TRIM Contour Lines
Planned Blocks (2026-2030)	WTP	Pipeline
Planned Blocks (TBD)	OGMA	Transmission Lines
Logged Blocks	Riparian Mgmt Zones	Future WGCFC Road Permit
BEC Zones	Caribou Winter Range	WGCFC Operational Roads
VRI	Moose Winter Range	NCD
Sufficiently Restocked	Woodlots	RP
Contiguous Areas of Sensitive Soils		S3; S6; STREAM
		Water Licenses

Projection: NAD83 UTM 10  
 Production Date: 10 Jan 2020  
 Produced By: max.tougas@ecora.ca





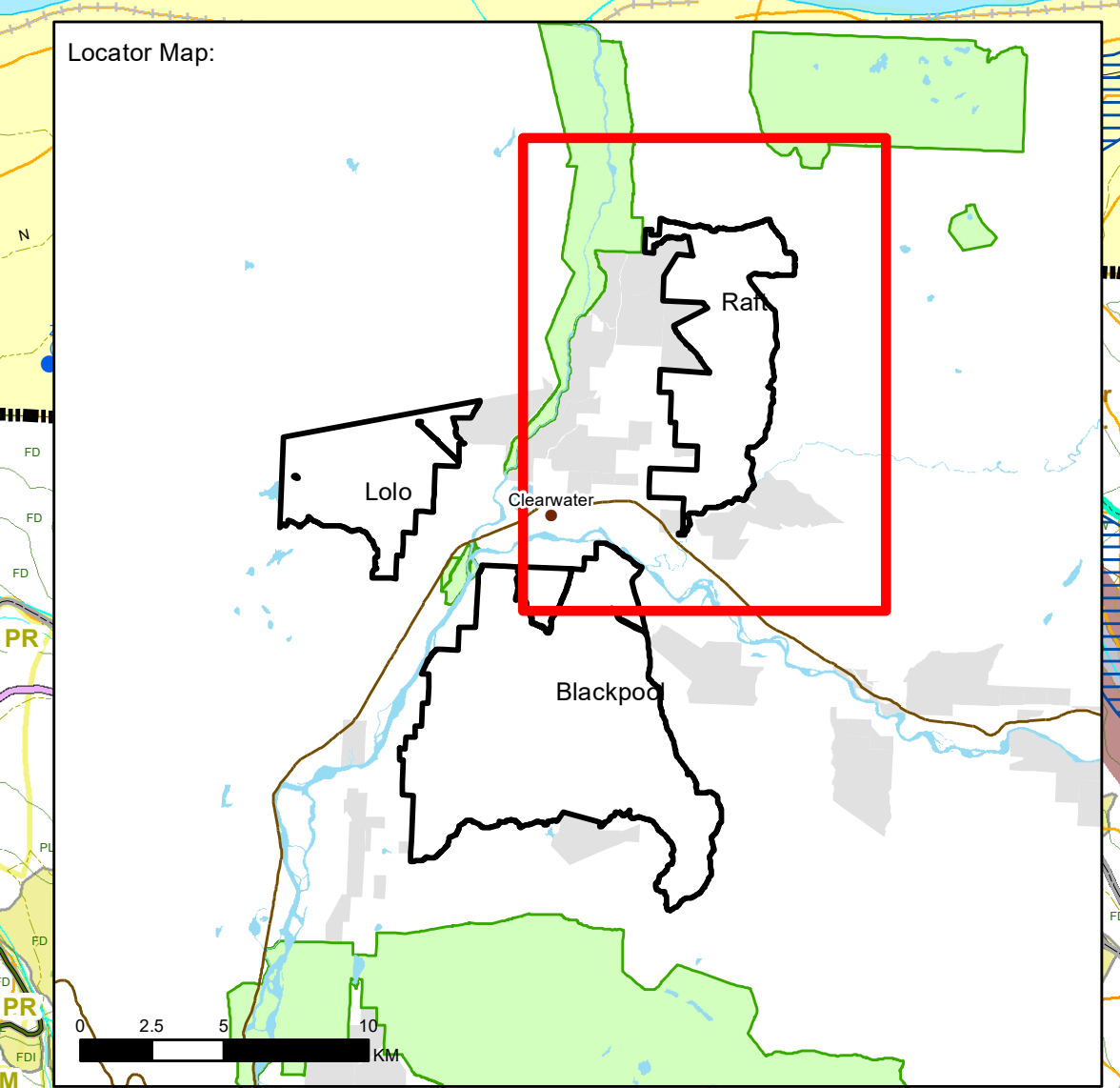
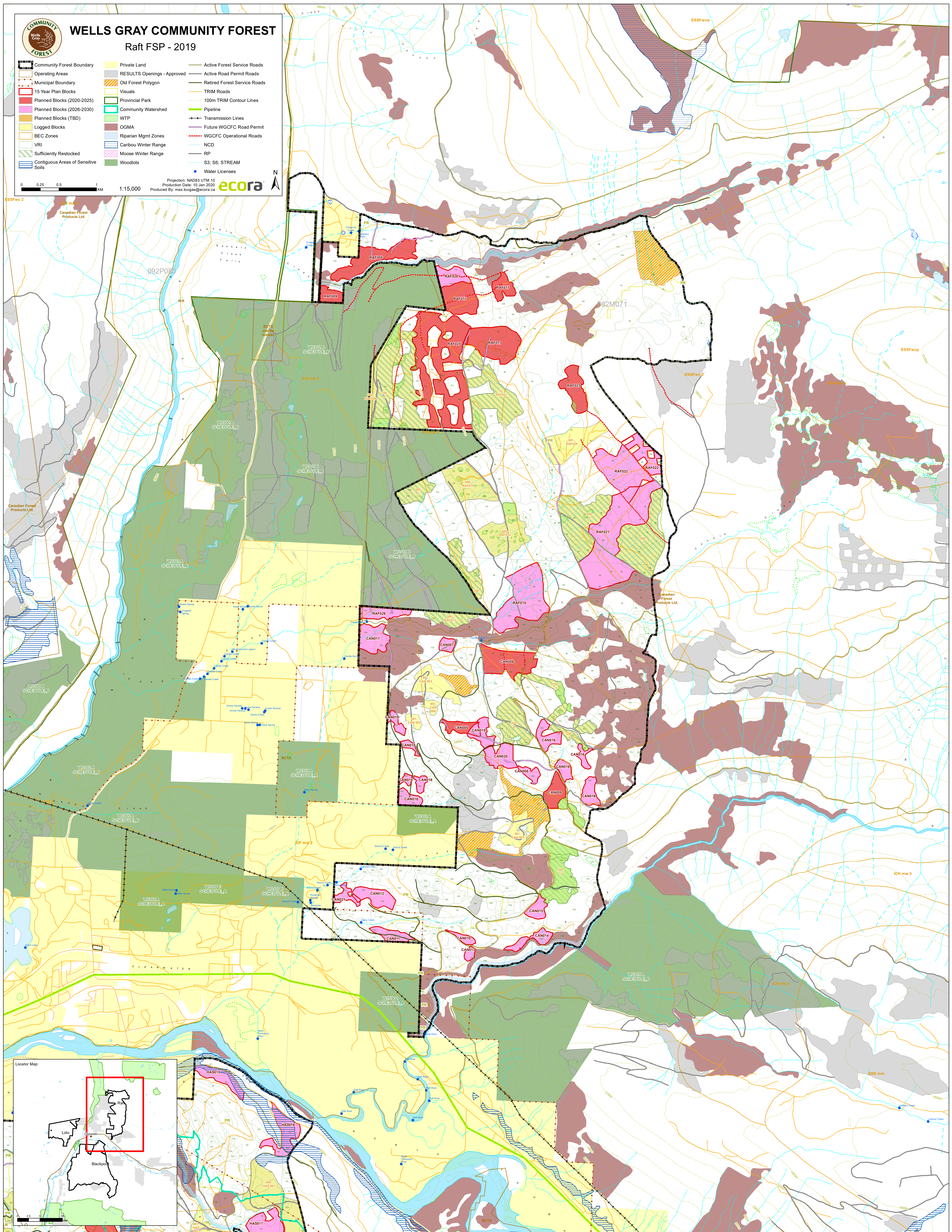


# WELLS GRAY COMMUNITY FOREST

## Raft FSP - 2019

- Community Forest Boundary
- Operating Areas
- Municipal Boundary
- 15 Year Plan Blocks
- Planned Blocks (2020-2025)
- Planned Blocks (2026-2030)
- Planned Blocks (TBD)
- Logged Blocks
- BEC Zones
- VRI
- Sufficiently Restocked
- Contiguous Areas of Sensitive Soils
- Private Land
- RESULTS Openings - Approved
- Old Forest Polygon
- Visuals
- Provincial Park
- Community Watershed
- WTP
- OGMA
- Riparian Mgmt Zones
- Caribou Winter Range
- Sufficiently Restocked
- Contiguous Areas of Sensitive Soils
- Active Forest Service Roads
- Active Road Permit Roads
- Retired Forest Service Roads
- TRIM Roads
- 100m TRIM Contour Lines
- Pipeline
- Transmission Lines
- Future WGCF Road Permit
- WGCF Operational Roads
- NCD
- RP
- S3; S6; STREAM
- Water Licenses

0 0.25 0.5 1 KM  
1:15,000  
Projection: NAD83 UTM 10  
Production Date: 10 Jan 2020  
Produced By: max.tougas@ecora.ca





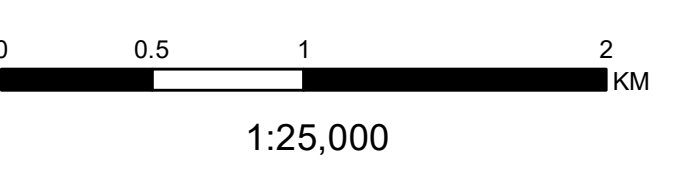
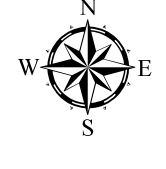
# Appendix B – WTR Zone Map



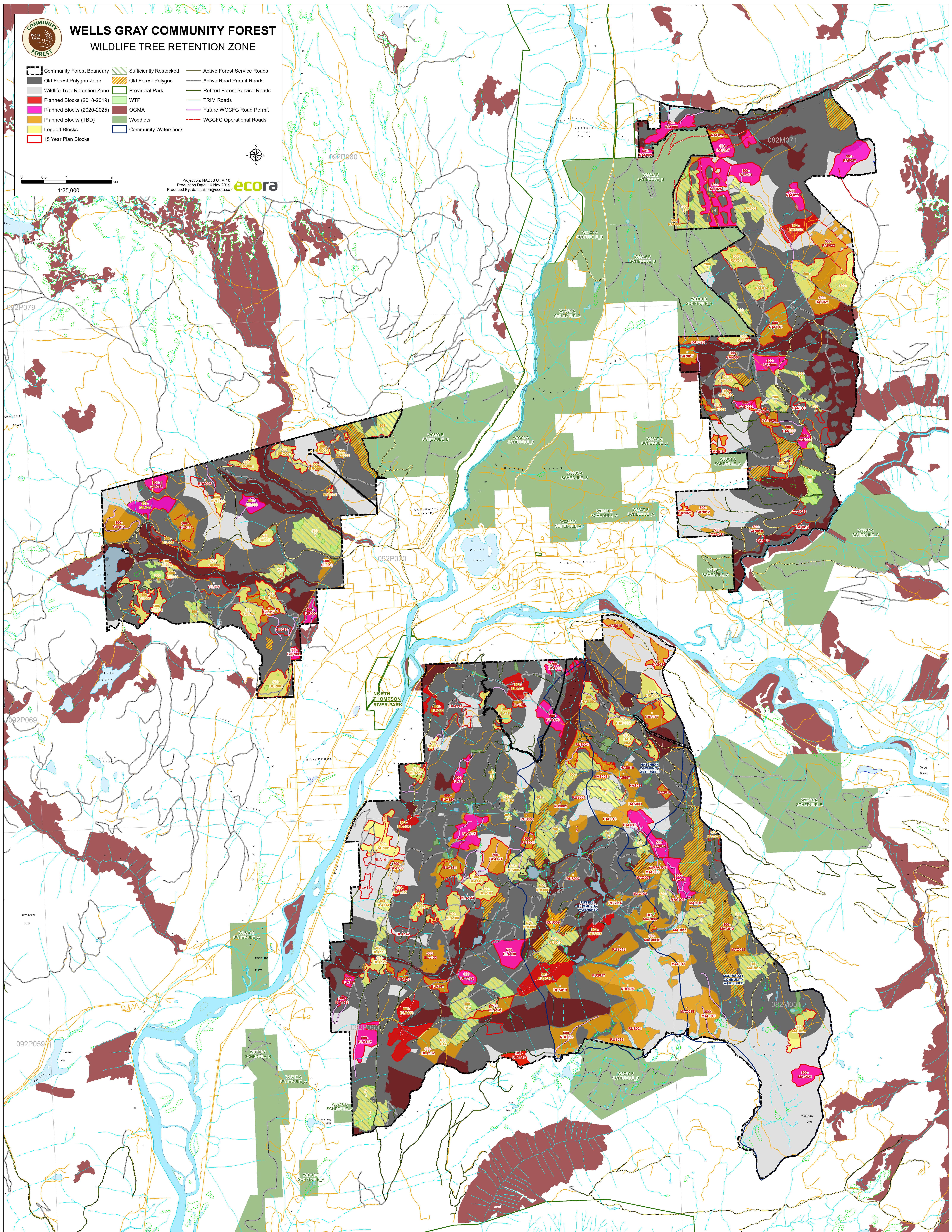


# WELLS GRAY COMMUNITY FOREST WILDLIFE TREE RETENTION ZONE

- Community Forest Boundary
- Old Forest Polygon Zone
- Wildlife Tree Retention Zone
- Planned Blocks (2018-2019)
- Planned Blocks (2020-2025)
- Planned Blocks (TBD)
- Logged Blocks
- 15 Year Plan Blocks
- Sufficiently Restocked
- Old Forest Polygon
- Provincial Park
- WTP
- OGMA
- Woodlots
- Community Watersheds
- Active Forest Service Roads
- Active Road Permit Roads
- Retired Forest Service Roads
- TRIM Roads
- Future WGFC Road Permit
- WGFC Operational Roads



Projection: NAD83 UTM 10  
Production Date: 16 Nov 2019  
Produced By: dani.talton@ecora.ca





## Appendix C: Review and Comment

### a) Advertising

In accordance with WLPPR 17(1)(a), a notice was published in the Clearwater North Thompson Times July 11, 2019 and July 18, 2019 editions. Pages from the newspaper are included.

### b) Referrals

The following referrals were completed:

Referral To:	When	How
Adams Lake Indian Band	June 28, 2019	Letter and Map
Canim Lake Indian Band	June 28, 2019	Letter and Map
Neskonlith Indian Band	June 28, 2019	Letter and Map
Simpw First Nation	June 28, 2019	Letter and Map
District Recreation Officer, MOFLNRORD	June 28, 2019	Letter and Map
RAN077159-1	June 28, 2019	Letter and Map
RAN077142-1	June 28, 2019	Letter and Map
TR0340T006	June 28, 2019	Letter and Map
TR0339T001	June 28, 2019	Letter and Map
TR0338T001	June 28, 2019	Letter and Map
District of Clearwater	June 28, 2019	Letter and Map
TNRD	June 28, 2019	Letter and Map Meeting July 31, 2019. e-mail followup Sept. 12, 2019

### c) Copy of Written Comments Received

Summary of Comments Received:

Comments From:	When	Comments
TNRD	July 23, 2019	See attached letter
Trails Task Force	May 16, 2019	Request to review Draft WLP
Thompson River District Comments Rnd1	August 19, 2020	Response January 2021
Thompson River District Comments Rnd2	February 12, 2021	Response May 2021
Thompson Rivers District Comments Rnd3	June 2021	Conference Call on June 21, 2021

### d) Revisions Made Because of Written Comments Received

Summary of Revisions Made Resulting from Comment:

Comment From:	Action Taken:
Thompson River District	Amended sections and/or provided rationale.

### **e) Efforts Made to Meet with First Nations**

The WGCFC has had ongoing communication with First Nations through 2019 with respect to upcoming plans, Draft Forest Stewardship Plan, Canfor Tenure Transfer, Business Process. To follow is a summary of this interaction.

- January 22, 2019 – Annual Meeting with Simpcw; Referral department Dallas and Kia. Discuss recent referral issues, no reply from department, moving forward, paying for AOA work, Request updated Terms of Reference, requirement for AOA contract.
- January 31, 2019 – re sent Pulp block information – 3<sup>rd</sup> time.
- April 1, 2019 – Referral sent to all Bands. Harvest program 2019/2020. Bla105, Bla134, Raf008, Raf009, Raf017
- May 13 and May 22, 2019 – Correspondence with Referral department, re 2018 reports and invoicing incorrect. No corrections to invoices or report received.
- June 28, 2019 – Letter to Simpcw, Adams lake, Neskonlith, Canim regarding the preparation of a Draft FSP for WGCFC. Input requested.
- July 10, 2019 – Followup to April 1, 2019 letter.
- August 26, 2019 – Referral sent to all Bands. Pulp program, additional block GIL011.
- September 17, 2019 – Letter sent to Chief and Council; regarding joint license opportunity. Canfor/Interfor tenure transfer.
- October 8, 2019 – Simpcw indicates that they would like to participate on the Board of Directors. Meeting agenda and invite provided for WGCFC Board meeting on October 10, 2019.
- October 31, 2019 – October 10, Meeting minutes provide to coordinator – KJ. Asked for any updates or clarification on Interfor transfer.



# Cottonwood trees pose threat to motorists

By Jaime Polmateer

When Bud Jenkins and his wife were taking a recent cruise down Highway 5, the last thing on their minds was the potential danger of the cottonwood trees along the sides of the road.

That would change, however, when one of the trees came crashing down on their car in Blackpool last month, sending him to the hospital for surgery.

“A whole tree fell on me, it came right across the front of our car and finished it off; it took four hours to get the surgery done on my neck,” said Jenkins.

“We thought nothing of (the dangerous trees). It was windy and we were just driving and it fell right on

our car.”

Jenkins’ friend, Bob Mumford, is a former timber feller and has been aware of the situation for a couple of years.

He said he’s tried to bring attention to the danger trees by writing letters to the Clearwater Times, as well as to the B.C. Government, in hopes of shining light on the issue.

“If you take a drive and specifically look for the trees that are leaning across the highway it’s just incredible,” said Mumford.

“You wonder how a lot of them are even standing up, why they haven’t fallen over yet, and the really big cottonwoods, a lot of them have huge limbs hanging right out over the highway above an entire lane.”



Resident Bud Jenkins had a recent trip to the hospital after a cottonwood tree fell onto his car during a trip down Highway 5 near Blackpool. Former timber feller Bob Mumford said he’s been aware of the threat the trees pose to motorists for some time, and he’s calling on the provincial government address the situation. Unsplash photo

Mumford said by working as a timber cottonwoods pose because how quick the specific type of tree is to rot.

The worst stretch of Highway 5 is between Little Fort and Blackpool, but the hazardous cottonwoods can be found all the way to Kamloops, he said. “It’s an especially extreme hazard area because it’s kind of swampy type ground that the cottonwood really likes to grow in, so all you have to do is take a drive past Little Fort and you can just see it,” said Mumford.

“Most people just drive through and never give it a thought, but I guess having worked as a faller in the bush for so many years I just have this extra sense for this type of thing because what keeps you alive is being aware of the dangers.”

Mumford suggested the province trim the trees back on the land under its jurisdiction, or at the very least,

erect warning signs to make motorists aware of the dangers along the highway.

He added if one of the branches, or like in Jenkin’s case an entire tree, were to fall on a tour bus, the results could be extraordinarily disastrous.

“There are just endless scenarios, and I tend not to get overly excited about things where anything can happen at any time, that’s for granted, but this hazard is too obvious,” he said.

“(In Jenkins’ case) if the tree had fallen a second sooner, it would have killed him and his wife both, the speed they were going, it would have come through the windshield and just cleaned house—so that’s my perspective on it.”

A spokesperson for the Ministry of Transportation and Infrastructure said in an email statement that the ministry does have an annual program to remove danger trees from within its road rights of way, though in some cases the responsibility for managing these trees rests with the land-

owner “The ministry at times may approach landowners with an offer to partner in the removal of hazardous trees,” she said.

“We currently do not have plans to remove trees along this section of Highway 5; however, we will take the recent concerns brought forward into consideration as we continue to prioritize our work throughout the area.”

She added as part of the service agreement with the ministry, maintenance contractors are obligated to carry out sweeping, brushing and clearing activities along provincial roadways and ministry right-of-way areas.

For more information on this process to maintain safe driving conditions, readers can visit: [www.transbc.ca/2018/04/06/our-spring-cleaning-checklist/](http://www.transbc.ca/2018/04/06/our-spring-cleaning-checklist/)

If people encounter trees or shrubs that have fallen onto the road, or are encroaching on B.C. roadways, they are encouraged to contact their local maintenance contractor.

For the Kamloops area, people can connect with Argo Road Maintenance at 1-800- 661-2025.

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A BIG THANKS TO ALL OUR AMAZING SPONSORS FOR MAKING THIS EVENT POSSIBLE!

**Notice of Wells Gray Community Forest Corp. Draft Forest Stewardship Plan for Community Forest Agreement K2A**

A draft Forest Stewardship Plan has been prepared for the Wells Gray Community Forest Corporation Community Forest Agreement K2A. This plan describes Results and Strategies that will be followed to meet objectives for resource management that have been determined by Government and identifies the measures to ensure the desired results are attained.

This draft FSP was discussed at the recent Annual General Meeting on April 25, 2019. A copy of the draft plan is available at the Wells Gray Community Forest website: <http://wgfc.ca/documents/resource-management/>. If you wish to make a comment on the documents, a contact address is on the website. If you are unable to access the electronic documents, contact George Brcko, General Manager, at the address or phone number noted below to make an appointment to view the documents at the District of Clearwater Community Centre. Comments are welcomed during the review period ending September 4, 2019.

**Wells Gray Community Forest Corporation**  
Community Resource Center, 209 Dutch Lake Road  
Clearwater, BC V0E 1N2  
**Ph: 250 674-3530**

Quit. Before your time runs out.

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British Columbia



# NDP candidate wants to make communities more affordable

By Jaime Polmateer

Federal NDP candidate Gina Myhill-Jones is taking a swing at the upcoming election in October, saying she has a good idea of what needs to be done to improve life for the average working person.

The 100 Mile House resident counts her rich volunteering experience as an asset to her potential as a politician, noting she has a finely honed ability to listen and get to the root of what people are asking for.

"It's hard to pin down an actual event that led to me deciding to (run), but I've been in the area for 10 years, I've been hoping for something to really start happening for the better in my community and all of the surrounding area and I guess I got tired of complaining," said Myhill-Jones.

"It's time to step up and do something."

Myhill-Jones has been a volunteer since arriving in 100 Mile House, formerly helping at the local women's centre society as a safe-house coordinator and now works as a community support worker for people with disabilities.

She was drawn to the NDP because the party's values align with what she knows needs to happen to make the riding a better place to live for residents, she said, including its affordable housing policy platform, because safe affordable housing for everyone should be a priority.

Another issue she'd like to see addressed

is transportation by making transit in the bigger centres greener and more affordable as well as beefing up services in the rural areas.

"In the city of Kamloops there are buses so you can get to and from work, but that can get really expensive, so you could make that urban transportation cleaner by making the buses electric and you could make it cheaper, or even free by a certain deadline," she said.

"But by the time you get out where I live we've lost bus service and we now have seniors that can't readily access medical appointments unless it's on a certain schedule; we want to make transportation affordable, accessible and hopefully cleaner."

Cleaner transportation goes hand in hand with addressing climate change, which is a topic she also has ideas for, noting it's important to have a genuine plan for transitioning to cleaner technology.

Offering residents incentives like rebates for upgrading their homes with equipment such as solar panels is a way to begin that transition, she said, and will ultimately lead to savings on electricity bills.

Additionally, internet and cell phone service in rural areas is a point in need of attention for Myhill-Jones, which might sound like an entertainment issue to some, but is something she said she considers an absolute safety issue.

"One thing I've heard talked about is the need to reduce costs and

make the internet and cell phone coverage accessible; I happen to live in an area where it's not readily accessible and it's terribly expensive. I think that stands true for most of our constituents that find themselves in a rural setting," she said.

The fact internet and cell phone coverage in rural areas haven't yet been improved by previous and current governments is concerning to Myhill-Jones because both can be vital tools in times of emergency when residents need quick access to information.

"Plus it would be nice to have a cap on the fees so you're not looking at a choice to cut back something else just to be able to have access to the internet."



Federal NDP candidate Gina Myhill-Jones wants to address some of the things she sees as issues in the riding like rural transportation and affordable internet and cell phone service. Myhill-Jones resides in 100 Mile House where she's an avid volunteer.

PHOTO SUBMITTED



## Notice of Wells Gray Community Forest Corp. Draft Forest Stewardship Plan for Community Forest Agreement K2A

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**Wells Gray Community Forest Corporation**  
Community Resource Center, 209 Dutch Lake Road  
Clearwater, BC V0E 1N2  
**Ph: 250 674-3530**

## WorkBC Centre

Announcing .....

### Helen Poss Apprenticeship Advisor for Industry Training Authority (ITA)

Is coming to WorkBC  
Clearwater  
July 31<sup>st</sup> 2019  
10:00 am to 2:00 pm

**First come first served**  
For information please call  
**250-674-2928**

#### WorkBC Clearwater

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Clearwater BC V0E 1N2  
Phone: 250-674-2928  
Fax: 250-674-2938  
[info@clearwateremployment.ca](mailto:info@clearwateremployment.ca)  
[www.clearwateremployment.ca](http://www.clearwateremployment.ca)

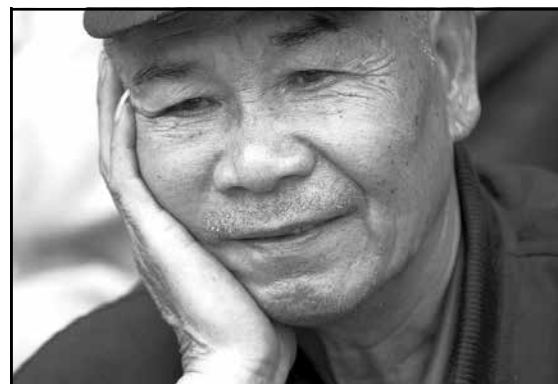
#### WorkBC Barriere

#5 - 4480 Barriere Town Road  
Barriere BC V0E 1E0  
Phone: 250-672-0036  
Fax: 250-672-2159  
[amy@clearwateremployment.ca](mailto:amy@clearwateremployment.ca)  
[www.clearwateremployment.ca](http://www.clearwateremployment.ca)

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Are  
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OK?

Take the quiz posted at [www.kidney.bc.ca](http://www.kidney.bc.ca) or [www.bcrenal.bc.ca](http://www.bcrenal.bc.ca) and see if you are at risk of developing Chronic Kidney Disease. You could be saving your own life (and you could win a prize!)

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Department: Planning

July 23, 2019

VIA Email: [wes.bieber@longfellows.ca](mailto:wes.bieber@longfellows.ca)

Longfellows Natural Resource Management Solutions Inc  
4840 16<sup>th</sup> Street NE  
Salmon Arm, BC V1E 1E1

Attention: Wes Bieber, R.P.F

Dear Sir:

Subject: Referral Response No. REF 523  
Forest Stewardship Plan – areas in and around Clearwater, BC

---

Planning Services has reviewed your plans to develop a Forest Stewardship Plan for those areas you have illustrated on the map near Clearwater. All the area you have noted is within the Thompson Nicola Regional District.

The subject area is located within Electoral Area "A" of the Thompson-Nicola Regional District (TNRD), and is zoned *RL-1: Rural* in accordance with Bylaw No. 2400. Long-range planning initiatives, including the Regional Growth Strategy and the current version of the Clearwater Official Community Plan, provide long range planning guidance for development in this area. If any development plans are within one kilometer of a lake, then the TNRD Lakeshore Development Guidelines may apply.

TNRD Planning Services is currently working on a new Official Community Plan for all of Electoral Areas A, B and O tentatively entitled the North Thompson Official Community Plan (OCP). This project has been ongoing for the past two years. The new OCP will include the areas shown on your plan. We would like to discuss the nature of the proposed Forest Stewardship Plan and further identify the meaning of a *community forest*. Presumably the approach to forest management will also include wildfire hazard management for these areas.

Feel free to call or email me at [danwallace@tnrd.ca](mailto:danwallace@tnrd.ca) to discuss your development plan.

Yours truly,

Dan Wallace, MCIP, RPP  
Planner

DW/le

	A	B	C	D	E	F	G
1							
2	09-May-18						
3			FSP #505 Replacement - Wells Gray Community Forest (K2A)				
4	FSP Section	FSP Section title	District Comments #1 August 19, 2020	WGCF Response Jan 2021	District Comments #2 Feb 12, 2021	WGCF Response April 2021	District Comments #3 June 2021
5	4.1.1	Water Management (KLRMP Objective 2.1.2)	1. The FSP definition of notification says 'any issues that are observed are resolved'. How will you go about resolving any issues (ie. will you work with the water licensee to develop mitigation strategies)? All other licensees have incorporated a mitigation strategy to achieve this objective.  2. Under Strategy a), <b>how</b> potentially impacted water licensees will be determined is not measurable. The wording, 'if the Holder considers', is relying on opinion and is not measurable (ie. will a QRP identify known water licences that may be potentially impacted)?	Adjusted definition of Notification to include meaning of resolution. Included criteria for when water licence holders are contacted. Removed qualification in part b) related to human consumption	No further comments		
6	4.1.2	Riparian Management Areas (KLRMP Objective 2.1.2.1)	1. The R/S under 4.1.5 Inland Fisheries are also meeting this objective and should be added to the list.	Added reference to Inland Fisheries	No further comments		
7	4.1.3	Old Growth Management (Ministerial Order under the Land Act)	1. KLRMP objective 2.1.3, Ecosystem Management is no longer applicable. The applicable objective here is the Land Act Ministerial Order. Old Growth Management Objectives for the Kamloops LRMP Area dated March 5, 2013.	Corrected reference	No further comments		
8	4.1.4	General Biodiversity (KLRMP Objective 2.1.3.1)	1. Ensure the wording next to 4.1.3 matches the wording used in section above	Corrected reference	No further comments		
9	4.1.5	Inland Fisheries (KLRMP Objective 2.1.5)	Under Strategy a), the words "the intent of" is not measurable. Why not just be consistent with the guidelines?	deleted "the intent of".	No further comments		

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10	4.1.6	Range (KLRMP Objective 2.1.10)	<p>1. The strategy says you will notify the Range tenure holder when harvest operations are planned <b>within the area of active Range Tenure</b>. What about adjacent range tenures that may be affected, will you notify these tenure holders as well?</p> <p>2. Where a Range Tenure Holder indicates that conflict between timber and range management may arise, what is your strategy for resolving issues?</p> <p>3. In the event that an agreement can't be reached, what is the dispute resolution process?</p> <p>4. In the case of an agreement that <b>has been reached</b>, how will any changes be dealt with or communicated?</p> <p>5. Please include wording into the FSP that explains how unallocated/vacant range tenures will be addressed. Will the District range program be contacted?</p> <p>6. Reduction of stocking stds due to cattle damage is an amendment that requires DM approval. It's hard for us to sign off on something like this when we're not sure what the end result will look like in each specific</p>	There are no cases where a Range Licence follows the boundary of the CFA, and all current licences overlap the CFA and include areas outside of the CFA. Items 2-4, 7 are resolved with clarification in the use of the word notification. Removed self exemption wording. Added wording related to new Range Licences being awarded within the FDU.	1. The wording under strategy 1) a) ii), <b>to the extent practicable</b> and the wording in the definition of Notification, <b>to the agreement of both parties</b> , may not be the same thing and causes confusion.	Removed 1)a)ii) entirely.	No further comments
11	4.1.7	Wildlife (KLRMP Objective 2.1.12)	1. What about strategies for any red or blue listed species that may be within the CF? (ie. Flam owl, Spotted Bat, Lewis's Woodpecker).		<p>1. As you did not resp-ond to the previous comment, does this mean these 3 species don't exist within the CF? Looks like there may be a tiny bit of Flamm Owl (4 small rank 1 polygons), could you please add R/S for this.</p> <p>As for Spotted Bat and Lewis's, it looks like they don't exist here. For clarity, it would be helpful if you could add something to this effect to the FSP.</p>	This strategy is included in 4.2.2; this is stated in 4.1.7. Cannot find any Flammulated owl occurrence at the CDC?	No Further comments (talked to John Surgenor and although the model says there is some habitat up there it is not necessary to manage for the species in that area as it is probably outside of their range)
12	4.1.8	Critical Deer Winter Range (KLRMP Objective 2.1.12.1)	1. Not applicable, no CDWR within FDU. It would probably be best if you remove this section or state there is none within the FDU, as it creates confusion.	This is already stated.	No further comments		



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13	4.1.9	Critical Moose Winter Range. (KLRMP Objective 2.1.12.2)	<p>1. The defn' of <b>Moose Habitat</b> is missing some key habitat elements such as lakes, wetland complexes (5 or more wetlands &lt; 1ha within 100m of each other) and deciduous stands (3ha+). Please update this defn' to the current BMP like those contained in the Moose &amp; Watershed Pilot Project, April 5, 2016.</p> <p>2. The defn' of Moose Winter range is missing the Appendix letter.</p> <p>3. Under Strategy a), mixed forest management, including deciduous may only be implemented as per the approved stocking standards, can you please add this wording.</p> <p>4. The defn' of <b>Moose Mgt Units</b> should include <b>Moose Habitat</b>, as it reads now, it's only the buffer.</p> <p>5. Please update/add strategies for thermal cover, snow interception cover, security cover, connectivity, etc. that are consistent with the BMP contained in the Moose &amp; Watershed Pilot project.</p>	<p>Moose and Watershed Pilot Project does not apply to the CFA FDU. We will prefer to go with a QRP approach as well as KLRMP guidance. Appendix Letter included. Clarified mixed forest management to be comply with stocking standards. Clarified definition of Moose Mgmt Units.</p>	<p>1. Habitat is more than just wetlands and the FSP defn' restricts to just wetlands, could you please include other habitat types.</p> <p>2. Strategy b) says..."within Moose Winter Range, retain at least 50% of the forested area equal to or greater than 20 years of age"...is this your defn' of <b>thermal cover</b>, if so could you please state this in FSP. Not certain the strategy retains suitable forest cover attributes for thermal cover...have asked John Surgenor for his opinion on this and will forward his response when we receive it. Why not commit to the defn' of thermal cover in the MWSPP which says...conifer leading, &gt;15m and at least 5ha.</p> <p><b>Comments from John Surgenor:</b>  - the definition of thermal cover that is generally used is the &gt;15m conifer leading – smaller patches of 1 ha are good but bigger (5 ha) is better,  - ideally this cover should be in close proximity to the forage areas (moose habitat) and these include any riparian including wetlands etc and deciduous stands,  - cover in close proximity to early seral (blocks 5 – 35 years) is important as well,  -the moose habitat term is not included in any of the strategies – only in the definition section. Ideally it should be the appropriate thermal cover in close proximity to the moose forage habitat.</p>	<p>Removed definition of Moose habitat as it was not relevant to the Strategy. Defined Thermal Cover in accordance with MWSP.</p>	<p>1. Strategy C notes 'Moose Management Unit'. If this term is going to be used in the FSP, it will require a definition.</p>
14	4.1.10	Visually Sensitive Areas (KLRMP Objective 2.1.14.1)	<p>1. The objective reference in the title is incorrect and should be KLRMP section 2.1.14.1. Also could you please correct the objective wording so it's verbatim.</p>	<p>Wording adjusted.</p>	<p>No further comments</p>		
15	4.1.11	Cultural and Heritage Sites (KLRMP Objective 2.1.16)	<p>1. The strategy says the <b>FSP holder</b> will undertake an Arch assessment. What about First Nations? Will there be an opportunity for potentially affected FN to be involved in Arch evaluation work?</p> <p>2. What about silviculture activities like site prep, will these activities be included in this process?</p> <p>3. Will harvesting &amp; road construction be referred to potentially affected First Nations to request specific information regarding Archaeological resources?</p> <p>4. What if you are made aware of an archaeological resource that may be potentially affected by harvesting or rd construction?</p> <p>5. What happens in the event that an agreement cannot be reached regarding the potentially affected Archaeological Resource?</p> <p>6. What if a previously unidentified potentially affected Archaeological Resource is identified during forest harvesting, road construction or site preparation activities?</p>	<p>Deleted this section as written and now refer to Section 4.2.8 for the Strategy for this Higher Level Plan Objective.</p>	<p>No further comments</p>		

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16	4.1.12	Settlement Resource Management Zone (KLRMP 2.2)	1. The Objective is not correct 2. Will primary forest activities be conducted in a manner consistent with the community plan? Please add wording to address this.	Used Notification instead of consult.	No further comments		
17	4.2.1	Soils (FPPR s.5)	1. Under <b>Definitions</b> - please either change the wording for 'Permanent Access' to 'Permanent Access Structure' or provide a defn for Permanent Access. <del>2. Under <b>Work Related to Rehab</b> section - please either change the</del>	Adjusted terminology.	No further comments		
18	4.2.2	Wildlife (FPPR s.7)	1. The title and strategy of this section are confusing as they do not match the objective. For example, it would be more clear to title this section Mountain Goat (FPPR s.7) as it would then match the Objective. And then also replace the wording under the strategy with only the bolded wording.	Made recommended edits.	1. For clarity, Mountain caribou shouldn't be mentioned here as it has it's own GAR order. 2. This objective is referring to s.7 species only, which for this District, is Mtn goat only. For clarity, it would be preferred if you could state in the FSP that there is no Mtn Goat winter range within the FDU. 3. Feel free to manage the occurrences like American Badger, that's good, but this strategy should be moved to section 4.1.7. As noted above, this section of FSP is for s.7 species only.	The objective applies to more than just Wildlife Act S7 species in our opinion and is a good place to deal with Species at Risk.  Mountain Caribou does have a GAR order, but the Southern Mountain Population occurrence in the CDC overlaps the CFA FDU.	No further comments.  Given that the mountain caribou GAR order boundaries do not overlap with the WGCF, you may manage consistent with the IWMS if you want to do so. This is not a legal requirement.  Although American badger is not a s.7 identified species and that the area target has been met in other parts of the KLRMP area, we will accept what has been written given there is no legal requirement to address the badger within the WGCF boundary.
19	4.2.3	Water, Fish, Wildlife and Biodiversity within Riparian Areas (FPPR s.8)	1. The FSP lists several sections of FPPR that will be adopted as a R/S, but a few are missing, specifically S.50 and 51(1) & 51(2), did you mean to adopt these as well? 2. The calculation for % Retention in a RMZ is confusing and we were not able to figure it out how to do it or what it applies to. Could you please re-write so it is more clear. 3. For clarity, can you please include S1-A, S1-B, L1-A and L1-B in the Riparian Class column. 4. Given the recommendation to increase retention around small streams (ie. FREP program and FPB), how will you go about meeting these recommendations? Will you be leaving any non-merchantable trees, brush or deciduous? 5. How will 0% retention meet the objective of conserving water quality, fish habitat, wildlife habitat and biodiversity, especially on those riparian classes with no RRZ? 6. Will there be Machine-free zones or restricted operation of machinery in	Added missing FPPR References. Clarified Percent Retention; this is how basal area retention is calculated. Added missing Riparian Classes.	1. Wording for the "Contributing Area" calculation still a bit confusing, but I understand the calculation. It seems, that because there are areas outside the block (500m up & down) that may contribute towards the BA retention requirements, this could result in less, sometimes even 0% BA retention in the RMZ within the cutblock. How does this strategy retain sufficient trees in the RMZ within the cutblock to prevent material adverse impacts to riparian values? Why not just use a table like the other Licensees have committed to? 2. Windthrow risks - looks like there may be some to many instances where BA retention could be 0%. Why not commit to leaving a higher minimum % as other Licensees have done, regardless of the windthrow risk (ie. use BMP to reduce windthrow risk while still committing to meeting the minimum BA retention)? 3. If windthrow risk is going to be left in BA retention table, then how is it determined and what are the cutoffs between low, moderate and high? 4. Will there be Machine-free zones or restricted operation of machinery, in any case? Because you did not respond to this comment, for clarity, can you let us know whether or not you are going to include this in your FSP. Other Licensees have committed to a 5m MFZ including leaving all non-merch, brush, adv. regen and deciduous, on all riparian areas.	1) Correct on the Contributing Area calculation; the only areas where basal area will be reduced to 0 would be an S6, or if recommended by a QRP. 2) Moderate and High Risk Windthrow BA Retentions would be in accordance with QRP. 3) While a 5m no machine zone would be our best practice, it is not required by legislation.	1. When we meet on July 21, could we go through a few scenarios to make sure we understand this calculation? It would be great if you could provide a couple of labelled examples for our mtg. 2. The way the Contributing area formula is written is a bit confusing, although we know what you mean...the CA of 1 proposed harvest = this, plus the CA of other blocks. Is there anyway you could write this so it's more clear?

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20	4.2.4	Water in Community Watersheds (FPPR s.8.2)	<p>1. The definition of ECA above the H60 line needs to be more specific. Clarifying the way the ECA is calculated would help to ensure the strategy is measurable/verifiable. (ie. "hydrologic recovery achieved through regeneration" is not measurable as it's not defined)</p> <p>After receiving advice from the Regional Hydrologist, there may be cases when waiting until there is a 25% ECA above the H60 would not be appropriate. Given the variability of watershed landforms &amp; geology, if there are known terrain issues, if the watershed is known or likely to be flashy, if the watershed is small and very connected to the water intake, or there are other known issues, a 25% ECA may not be sufficient to achieve the objectives and therefore not consistent with the objective. As such, the District can not determine if this strategy is consistent. Please provide a more certain strategy or result.</p> <p>Why not commit to complete an assessment on all CWs prior to harvesting /rd construction or have a QRP confirm that an existing assessment is still relevant/applicable to determining if further forest practices will be consistent with the objective?</p>	Clarified by reference to Extension Note 116.	<p>1. Extension note 116 applies to pine dominated types on flat ground and does not provide any certainty to this strategy and its applicability on this landbase is questionable.</p> <p>As previously noted, our Regional Hydrologist has said that there may be cases when waiting to do a watershed assessment until there is 25% ECA above the H60 line would not be appropriate.</p> <p>Why not commit to having a QRP complete an assessment on all CWs prior to harvesting/rd construction or have a QRP confirm that an existing assessment is still relevant/applicable to determining if further forest practices will be consistent with the objective? An eca might be part of it but, how the QRP gets there is not essential.</p> <p>2. Why not complete a reassessment consistent with frequency recommended by QRP in the watershed assessment, rather than every 5 years.</p> <p>3. Who determines the road sedimentation risk? Is it part of the watershed assessment?</p>	<p>My understanding is that the hydrologic recovery curves developed in Extension 116 are being applied across the Southern Interior and am not aware of another set of curves that would apply.</p> <p>I have added a qualifier that applies to this Community Watershed specifically. A past Assessment has recommended an interval of assessment and we are complying with this recommendation.</p> <p>Part of the watershed assessment that we have had completed is a table that identifies road sediment risk.</p>	<p>1. Who evaluates and categorizes road sediment risk must be identified in the FSP.</p> <p>2. I am not certain about the Ext 116 applicability, what else is there to use? I think that an ECA calculation is one of those commonly used assessments that need not be detailed.</p> <p>3. The strategy is a bit awkwardly worded in that the first part a, b and c make sense, but 'within a Designated Community Watershed that has been recommended by a QRP,' does not. I am not exactly sure what the QRP is recommending here. I would think maybe it is in reference to d, that an assessment be completed every 5 years or less, as recommended by the QRP?</p>
21	4.2.5	Wildlife and Biodiversity - Landscape Level (FPPR s.9)	<p>1. It's unclear if the italicized wording is a strategy or a comment. Either way, we need to know how often the analysis of the Clearwater and Raft landscape units will be updated, in order to achieve consistency with s.64 &amp; s.65.</p>	Given early seral stage is represented by 2 – 20 year age classes (0-20, 21-40 yrs), it is not unreasonable to expect that this update should be replaced in 10 years; ½ of the age class interval. The last update to the Clearwater LU was "Patch Size Distribution Analysis – Clearwater Landscape Unit/Kamloops TSA, February 14, 2020, Forsite Consulting Ltd."	No further comments.		

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22	4.2.6	Wildlife and Biodiversity - Stand Level (FPPR s.9.1)	<p>1. The Wildlife Tree Retention strategy is not clear. On one hand it says you will be consistent with s.66 and on the other hand it says wildlife trees will be retained on 80% of blocks &gt; 5ha. Please clarify.</p> <p>2. WTR Zone - how is having only WTR within the WTR Zone consistent with the objective?</p> <p>3. The Wildlife tree retention zone map in Appendix E is confusing - what are the old forest polygons and will there be WTR within the old forest polygon reserves? Is the light grey area on map the only area where WTR applies?</p>	<p>WGCF is committed to both the SFM Plan measurable as well as FPPR S.66. We make the case that the area outside of the WTR Zone has already achieved the requirements of FPPR S66 and therefore the requirements of FPPR S66 need only apply to the WTR Zone area. The Old Forest Polygons are those designed by the WGCF; reserves in addition to OGMA.</p>	<p>1. Some of the planned cutblocks outside the <b>WTR Zone</b> will achieve the requirements of s.66, but there may be instances where some will not.</p> <p>For example, reserve areas that are more than a tree height distance from that block boundary would not be consistent with the objective. To be consistent, WTRAs that are located outside the block bdr must either be contiguous or sufficiently close (within 1 tree height distance). Also, non-contiguous WTRAs are not as effective and should only be considered when there are limited options within or adjacent to the block.</p> <p>2. In order to be consistent with s.66, both in and out of the WTR zone, 3.5% related to a cutblock and 7% of the total area of cutblocks over a 12 month period, must be WTR. 80% of blocks &gt;5ha is not consistent with s.66.</p>	<p>I do not say that the cutblocks outside of the WTR (within the OFP) will meet S66. Our premise is that stand level biodiversity is already met in the OFP zone (see table in 4.2.6 worksheet). Retention levels on an areabased tenure impact the availability of working forest land base thereby putting downward pressure on the allowable cut. We are wanting to manage this to ensure that we are minimizing impact to working forest where it is evident that biodiversity objectives are achieved.</p> <p>Given retention is not required to be within the block (can be adjacent), this SFM objective can be met. Further, the block level obligation on small blocks would lead to small retention areas that would be administratively difficult to manage (3.5% of 3 ha = 0.1 ha), may result in fragmentation, and may not be located in the best potential sites.</p> <p>See the worksheet 4.2.6 for more information.</p>	<p>1. To identify that the holder will retain WTRAs and/or WTR on 80% of blocks, in the WTR Zone, that are greater than 5 ha, and then note that retention levels in the WTR Zone will comply with FPPR s.66 cannot be. You cannot achieve s.66 if targeting the other standard.</p> <p>2. This strategy does not appear to meet the objective, specifically the FPPR defn of "wildlife tree retention area" = area occupied by wildlife trees that is located o in a cutblock, o in an area that is contiguous to a cutblock, or o in an area that is sufficiently close to the cutblock that the wildlife trees could directly impact on, or be directly impacted by, a forest practice carried out in the cutblock.</p> <p>There may be instances where it is necessary or appropriate to have wildlife tree retention non-contiguous with the harvest area as long as the trees are in close proximity to the cutblock (e.g., within one-tree-height distance of the cutblock boundary). See "FRPA General Bulletin No.8" and "Wildlife Tree Retention-Management Guidance".</p> <p>We would like to see a commitment to FPPR s.66 given this area can be achieved using non-THLB areas like OGMA, riparian reserves, etc, that also meet the WTRA definition.</p> <p>3. Worksheet 4.2.6 does not seem to be relevant here as these are Landscape level calculations, not stand level.</p> <p>4. Presumably there should be an 'or' between a and b such that the WGCF may harvest WTR when it achieves a; or achieves b and c together.</p>
23	4.2.7	Visual Quality (FPPR s.9.2)	<p>1. The KLRMP obj # is incorrect.</p> <p>2. Too difficult to determine the extent and category of the visual direction. Where do the VQOs come from as VQOs have not been established in the former Clearwater Forest District. How does this mapping reconcile with the VLI in the BCGW using the VSC for each polygon.</p> <p>3. The word <b>etc</b> is not measurable</p>	<p>As determined by relating the FSC Final Value to rVQO in the Visual landscape Inventory approved for this area. Removed "etc".</p>	<p>1. It doesn't look like linework on the FDU maps matches the linework in geographic warehouse. Where did you get your linework from?</p> <p>2. The map should not default to the lesser of the two categories. The choice should be made at the time of fieldwork after weighing a bunch of factors rather than being a decision made on paper. For example, for VSC 2 which is R or PR, your map shows PR only.</p> <p>3. Footnote 2, there is no FSC, not applicable.</p>	<p>Updated linework and labelled polygons by VSC not rVQO to eliminate confusion. FSC was a typo; should have been VSC.</p>	<p>No further comments.</p>



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24	4.2.8	Cultural Heritage Resources (FPPR s.10)	<p>1. Under the defn' of CHRE, section i), what kind of input is the Licensee requesting? Section ii), which CHR and how would you come to know about it? Section iii), will indirect impacts also be addressed and how are direct and indirect impacts defined? Section iv), who would prepare these recommendations, the QP or the Licensee and would these recommendations then be implemented by the Licensee? Section v), does the Licensee also have plans to communicate about how they are planning to respond to any recommendations that may result from the evaluation?</p> <p>2. Strategy a - standard of practice has been 60 days, is there a reason 30 days is being proposed?</p> <p>3. Strategy b - will a CHR evaluation be done if a FN requests it based on their assessment of potential?</p>	<p>Made clarifications to the Definition of CHRE.Changed Notification to 60 days.CHRE will be completed if requested by FN, or if CHR is identified by others.Clarified part d)</p>	<p>1. Under Strategy a), suggest changing the first sentence to something like this.."The Holder of this FSP will complete a notification of road construction and harvest plans to affected First Nation bands, <b>and seek information</b> related to the existence..." The way its currently written, it sounds like the First Nations are the ones seeking information rather than the Licensee.</p> <p>2. Strategy a), typo in last sentence, should be <b>commencing</b>.</p> <p>3. Strategy b) 1st sentence. You may want to move the word "if" to the end of the sentence so it's more clear ("...for the area being planned for road construction and harvest if:")</p> <p>4. Under Strategy e), "primary forest practice" should be changed to <b>"primary forest activity"</b>, so it's consistent with the wording used in legislation and in FSP definitions section.</p>	<p>Wordcrafted Strategy according to comments, except for the wording around seeking information as we believe this to be correct.</p>	<p>1. What happened to the 60 days under Strategy (a)?</p>
25	4.2.9	Recreation Site (FPC of B.C. Act S.104; ObjectiveGrandfathered FRPA 180, 181)	<p>1. Objective - we don't have any record of an objective set by government for these sites - where did you get these objectives? You are free and clear to manage these areas, but shouldn't call them govt objectives, but rather something like management intent.</p> <p>2. Title - what is FPC s.104 referencing? Maybe it should be removed.</p> <p>3. Under Approach to Roads and Harvest, please replace the words <b>Woodlot licence</b></p> <p>4. Under the 4th bullet, please replace the word <b>objective</b> with</p>	<p>Interesting, I will do some research on this one and change it to Management Intent if necessary.Your reference to Woodlot Licence makes me think that I uploaded the incorrect version of the FSP as the version I am making edits to does not have this wording.strategies a-c are directly related to the REC units that do not have Government Objectives and therefore are separate from the table above.</p>	<p>1. What did you find out about the Objectives set by govt?</p> <p>Ron Vanderzwan looked up the rec info in Arcmap (see Ron's email which is attached to the same email containing this spreadsheet). It looks like Rec 4527 Raft Mtn has established Objectives. Rec 5823 and Rec 4599 have no objectives. And there are 4 others we are not sure about. Best to confirm all the above with Sandy MacKenzie.</p>	<p>Simplified the Strategy; aligning with other FSP strategies.</p>	<p>1. Change in an 'are' to in an 'area'.</p> <p>No further comments.</p>

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26	5.0	Measures to Prevent the Introduction or Spread of Invasive Plants (Act s.47 and FPPR s.17)	<p>1. Reporting new invasive sites within one year is a long time. Other Licencees have committed to 30 or 60 days</p> <p>2. Section a), what does section 5.4 of the FSP refer to?</p> <p>3. Section c), Is this any and all exposed soil, prob best to define this a bit more.</p> <p>4. Section f), what is the definition of achievement of vegetation? What is the timeframe of the repeated additional seeding?</p> <p>5. Section g), saying "may include, but are not limited to" is not measurable. What does cleaning equipment following completion of work mean, could you define this more (ie. Is this after an entire permit, after the season, after the block or prior to moving to an uninfested area?)</p> <p>6. Will primary forest activities occur on uninfested sites before moving to infested sites?</p>	WGCF has a staff of 1, with a lot on his plate. A 30-60 day reporting time would not be realistic for the manager to succeed at! Corrected FSP reference. Deleted non-measurable wording.	<p>1. Could you please define <b>achievement of vegetation</b>.</p> <p>2. What is the timeframe of the repeated additional seeding?</p>	Defined achievement. Provided guidance on re-seeding timing.	No further comments.
27	6.0	Measures to Mitigate the Effect of Removing or Rendering Ineffective Natural Range Barriers (FPPR s.18)	<p>1. Under Measure a) please replace the word "their" with "the"</p> <p>2. Who will develop strategies under section b)? The wording is a bit unclear.</p> <p>3. If there are any issues with coming to an agreement with the range tenure holder, the District should be contacted - could you please add this to your measure</p> <p>4. If there is a vacant or unallocated tenure area, please complete the same process with the district range program.</p> <p>5. Could you please add some wording that says primary forest activities</p>	Fleshed out the mitigation piece with reference to who develops and adding MOFNORD for dispute resolution.	No further comments		
28		Even-aged SS	As long as the stand being harvested is still considered stocked post harvest. And that RESULTS is updated with the information proving it is still stocked.	deleted section - changed stocking standard management in accordance with Chief Forester Reference Guide.	No further comments		
29		Uneven-aged SS	As per FPPR s. 16(4), the FSP must specify stocking stds for areas referred to in section 44(4) (commercial thinning, remove of individual trees or similar type intermediate cutting, harvesting special forest products) and the situations or circumstances that determine when the stocking standards will be applied. Could you please add this to the FSP.	deleted section	As per FPPR s. 16(4), could you please specify in the FSP, the situations or circumstances that determine when the uneven-aged stocking standards will be applied.	We have added a section that commits the holder <b>not</b> to carry out the harvests described in FPPR 44 (3)(h&i).	No further comments.
30		Broadleaf SS	No specific comments.	deleted section			
31		Minimum SS	No specific comments.	deleted section			

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2	09-May-18						
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32	7.1.2	Minimum Inter-tree distance	Not less than 1.0-m. Please state this in this section of the FSP.	done.	No further comments		
33		Crop Tree/Brush Ratio	No specific comments.	deleted section			
34	7.1.3	Characteristics of Residual Mature and Pole Layer Crop Trees	No specific comments.				
35	7.1.4	Broadleaf Free Grow Heights	No specific comments.				
36	7.1.5	Regeneration Delay	No specific comments.				
37	7.1.6	Maximum Density	No specific comments.				
38	7.1.7	Free Growing Damage Criteria	<i>A tree susceptible to dwarf mistletoe that is located within 10 m of an overtopping tree, which is infected with dwarf mistletoe, will not be considered susceptible if the overtopping infected tree is part of an approved cut block boundary or is reserved from harvest within the harvestable area to address other non-timber objectives, as permitted under this FSP. This paragraph must be removed - not acceptable in an FSP as it is an exemption. Plant alternate species that are not susceptible to dwarf mistletoe.</i>	deleted paragraph	No further comments		
39	7.1.8	Tree Species Mix	No specific comments.				
40	7.1.9	White Pine	To reduce white pine blister rust infections, non-rust resistant Pw is to be pruned to 1.3 meter height where it makes up more than 5% of the minimum free growing number. <i>SU with less than 5% non-resistant Pw contributing to the minimum free growing number require no pruning and can be accepted as free growing.</i> Unless resistant stock is used or Pw trees are pruned - no Pw is acceptable at FG. Please remove the second sentence regarding 5% acceptable pruned or not.	done.	1. Okay to have Pw as acceptable up to 30%, but <b>not</b> okay to have it as preferred species up to 50%. It would be very risky to have a 50% leading Pw stand even with rust resistant stock.  2. Regarding the second sentence – it is still incorrect. To use 5% or > of natural Pw that is not rust resistant and only prune it if it exceeds 5% is unacceptable. Any Pw that is not pruned or from rust resistant stock has a very low chance of survival and will likely not be there at age 25 to 30-yrs. Just prune it if you want to use up to 5% towards FG,	Given we are complying with the Reference Guide, the first paragraph is redundant and so I have deleted it. We have also reworded second paragraph.	
41		Free Growing Standard Adjustment	This is in effect an exemption to the SS's and should be removed from the FSP. The majority of what is stated in this section should be known prior to writing the SP or harvesting the block. Thus, it can be dealt with within the SP at the time of writing. Section should be removed.	deleted	No further comments		
42	7.1.10	Species Suitability	No specific comments.				

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43	7.1.11	Root Disease	This does not make sense. Why would root disease be mapped post harvest (quite difficult to do). It should be mapped and delineated pre-harvest. Do not stump an entire block unless the entire block is infected with root disease. Please see and manage as per the new "Managing Root Disease in BC" <a href="https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-health/forest-health-docs/root-disease-docs/rootdiseaseguidebookjune2018_4.pdf">https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-health/forest-health-docs/root-disease-docs/rootdiseaseguidebookjune2018_4.pdf</a> Please amend this section to follow the new "Managing Root Disease in BC" management book. This new guidance supersedes the SEDA's and no longer follows them. Do not stump by BEC zone.	amended section	No further comments		
44		SS	Does not make sense if plan to stump - does make sense if you do not stump. Not required if survey is done to delineate and map areas of root disease and stump only affected areas within blocks not entire blocks. Poor practice to just assume it is there and stump everything by subzone. Bad for soils, invasive weeds etc. Please review the new "Managing Root Disease in BC" <a href="https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-health/forest-health-docs/root-disease-docs/rootdiseaseguidebookjune2018_4.pdf">https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/forest-health/forest-health-docs/root-disease-docs/rootdiseaseguidebookjune2018_4.pdf</a> Should discuss b and c with Candice and Stacey for their feedback about added preferred species - so we want this. Also they should have the standard acceptance paragraph for the upcoming SS for the region. "When required, an amendment will be made to incorporate the stocking standards and variations, as developed by the Thompson Okanagan Stocking Standards Working Group."		No further comments as have now adopted CF Reference Guide for stocking standards.		
45		Actual Stocking Standards	Pw is not acceptable without the correct footnote. <b>Actually all footnotes must use the current CF provincial SS footnotes - please amend.</b> Also, BI is not preferred within the MSdm2 and will not help with root disease - especially Armillaria. Please move to acceptable. ICHmk2 02 - BI is not acceptable - please remove. ICHmk2 03 BI is not acceptable - please remove. ICHmk2 04 Lw can only make up 10% overall for the CF and 30% of a specific cutblock. ICHmw3 04 BI and Hw are not acceptable - please remove. ICHmw3 05 - Lw can only make up 10% overall for the CF and 30% of a specific cutblock. IDFmw2 01 Cw Sx and Py can be acceptable but not preferred - please amend, 01YC Cw and Sx can be acceptable but not preferred and Py is neither acceptable or preferred - please amend, 01YS Cw and Sx can be acceptable and Py is neither acceptable or preferred - please amend, 02 Py can be acceptable but not preferred - please amend, 03 Py can be acceptable but not preferred - please amend, 04 Cw can be acceptable but not preferred - please amend, 05* Cw can be acceptable but not preferred - please amend. MSdm2 01 - BI can be acceptable but not preferred - please amend. MSdm2 05 BI can be acceptable but not preferred - please amend.	Rationale?	No further comments as have now adopted CF Reference Guide for stocking standards.		
46		Broadleaf SS	Free growing early assessment date of 1-yr is too early - please amend to - discuss with Stacey and Candice. (As stated in appendix C it has been amended from 12-yrs to 1yr).		No further comments as have now adopted CF Reference Guide for stocking standards.		
47	Appendix A	FDU Map					

	A	B	C	D	E	F	G
2	09-May-18						
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48	Appendix E	WTR Zone Map and Visual Quality Objectives Map					
49	Appendix F	Review and Comment					

To follow is a table that summarizes current retention levels in the CFA. It illustrates the proportion of retention compared to the total CFA as well as the area of the Old Forest Polygon layer. When compared with Biodiversity Guidebook targets for each Biogeoclimatic Zone, the table illustrates that with the exception of ICHdw3, targets are met in the OFP Layer. Considering that the ICHdw3 is a new biogeoclimatic zone and is a subdivision of the ICHmw3, and that the ICHmw3 comparison exceeds target, we submit that the biodiversity objective is met.

One might submit that all of the retention areas do not meet the definition of "old" from the biodiversity guidebook. We believe that it is not the definition that is important, it is the area that is being managed for old forest that is important. The CFA focus for retaining landscape and stand level retention continues to be the identification of landbase where the best value for biodiversity can be anchored.

This strategy is a quantitative and measureable approach to achieving biodiversity objectives while maintaining timber supply for the CFA. This is consistent with the Government Objective: ***without unduly reducing the supply of timber from British Columbia's forests***, to retain wildlife trees.

BGC Label	NDT	OFL Area (Ha)	Area of WGCF (Ha)	OFL% of WGCF	Area of OFP Layer (ha)	OFL% of OFP Layer	Target Old (Biodiversity Guidebook)	% required as WTP in WTR Area
ESSFdc 3	3	230.7	2,082.0	11%	1329.8	17%	>14	3
ESSFdcw		0.0	241.5	0%	0.0	0%		5
ESSFwc 2	1	139.0	978.9	14%	724.7	19%	>19	5
ESSFwcw		0.0	5.8	0%	0.0	0%		0
ICH dw 3	3	177.0	1,545.7	11%	1364.0	13%	>14	3
ICH mk 2	3	546.6	2,957.6	18%	2765.0	20%	>14	-5
ICH mw 3	3	261.3	1,693.8	15%	1480.7	18%	>14	-1
IDF mw 2	4	449.6	4,250.2	11%	3379.3	13%	>13	2
<b>Total:</b>		<b>1,804.1</b>	<b>13,755.5</b>	<b>13%</b>	<b>11,043.6</b>	<b>16%</b>		

OFL = Old Forest Layer; made up of OGMA, Old Forest Polygon and WTRA  
OFP Layer = the layer that is created by buffering the OFL by 500m.