

WOODLOT LICENCE # 1557

WOODLOT LICENCE PLAN

First Term
2007 to 2017

864 Cherry Point Road
Cobble Hill, B.C.
V0R 1L0

Authorized Licensee Signature:

Susan Paul

[Signature]

August 8th, 2007

[Date]

DISCLAIMER

- Recognizing the special nature of management on a woodlot licence, this disclaimer forms part of the Woodlot Licence Plan (WLP) for Woodlot Licence Number 1557 (W1557) and advises that:
 - the decision to operate under one or more of the Default Performance Requirements provided in the Woodlot Licence Planning and Practices Regulation (WLPPR) is the sole responsibility of the woodlot licence holder, and involved no detailed oversight or advice from the prescribing registered professional forester. This disclaimer is signed on the explicit understanding and information provided by government that, the use and achievement of a Default Performance Requirement, meets the expectations of government with respect to the management of woodlot licences;
 - the undersigned Registered Professional Forester has been retained to provide advice on the practice of professional forestry with regard to items such as alternative performance requirements, applicable results and strategies and other required measures that do not have a default performance requirement provided in the WLPPR.

Signed _____

Name (Print): Nancy Pezel

RPF # 2315

Contact phone number: (250) 752-8896

Email: islandswest@shaw.ca

TABLE OF CONTENTS

1. CONTENT FOR A WOODLOT LICENCE PLAN (WLP)	1
1.1 PLAN AREA	1
1.2 MAP AND INFORMATION	1
1.3 AREAS WHERE TIMBER HARVESTING WILL BE AVOIDED	2
1.4 AREAS WHERE TIMBER HARVESTING WILL BE MODIFIED	2
1.5 CONSERVING AND PROTECTING CULTURAL HERITAGE RESOURCES	3
1.6 WILDLIFE TREE RETENTION STRATEGY	4
1.7 MEASURES TO PREVENT INTRODUCTION OR SPREAD OF INVASIVE PLANTS	5
1.8 MEASURES TO MITIGATE EFFECT OF REMOVING NATURAL RANGE BARRIERS	6
1.9 PERFORMANCE REQUIREMENTS	6
1.9.1 STOCKING INFORMATION FOR SPECIFIED AREAS	6
1.9.2 SOIL DISTURBANCE LIMITS	6
1.9.3 PERMANENT ACCESS STRUCTURES.....	6
1.9.4 STOCKING STANDARDS	7
1.9.5 WIDTH OF STREAM RIPARIAN AREAS	8
1.9.6 WIDTH OF WETLAND RIPARIAN AREAS	8
1.9.7 WIDTH OF LAKE RIPARIAN AREAS	8
1.9.8 RESTRICTIONS IN A RIPARIAN RESERVE ZONE.....	8
1.9.9 RESTRICTIONS IN A RIPARIAN MANAGEMENT ZONE.....	8
1.9.10 WILDLIFE TREE RETENTION.....	8
1.9.11 COARSE WOODY DEBRIS.....	8
1.9.12 RESOURCE FEATURES.....	9
APPENDICES	13
2. SUPPLEMENTAL INFORMATION TO SUPPORT THE PROPOSED WOODLOT LICENCE PLAN	13
2.1. REVIEW AND COMMENT	13
2.2 EFFORTS MADE TO MEET WITH FIRST NATIONS	15
2.3 EXEMPTIONS (<i>OPTIONAL</i>).....	16
2.4. RATIONALE IN SUPPORT OF PROPOSED ALTERNATIVE PERFORMANCE REQUIREMENTS.....	16

1. CONTENT FOR A WOODLOT LICENCE PLAN (WLP)

1.1 PLAN AREA

This plan covers a portion of the Woodlot Licence area.

This plan only covers the Crown portion of the woodlot. No activities are expected to occur in the private portion of the woodlot during the first term of the Woodlot Licence Plan.

1.2 MAP AND INFORMATION

This Woodlot Licence Plan covers the Crown portion of W1557, which lies between Kinsol Mountain and the Koksilah River in the Cowichan Valley.

The majority of the applicable information required to be addressed under Section 8(1) of the Woodlot Licence Planning and Practices Regulation (WLPPR) is identified on the map in Appendix III. Only the required information not identified on the map is included in this section.

Biogeoclimatic zones and subzones:

The Crown portion of the woodlot lies within the Coastal Western Hemlock Very Dry Maritime subzone (CWHxm1).

Resource Management Zones, Landscape Units or Sensitive Areas:

The entire woodlot licence lies within the E&N South General Management Zone of the Vancouver Island Land Use Plan. This woodlot licence plan is consistent with the applicable government objectives specified for this General Management Zone.

Scenic Areas:

The Crown portion of the woodlot licence area covered under this Woodlot Licence Plan lies within a Scenic Area. However, the entire Crown portion of the woodlot is not visually sensitive because it is not visible from the Shawnigan Lake travel corridor.

Community Watershed:

The woodlot licence does not lie within a community watershed.

Community and domestic water supply intakes that are licensed under the Water Act and any related water supply infrastructures:

There are no known licensed domestic water supply intakes or related water supply infrastructures located within or immediately adjacent to the woodlot licence area covered by this Woodlot Licence Plan.

Contiguous areas of sensitive soils:

Sensitive soils (Es on WLP map) are evident in the north-western portion of the woodlot licence area. These are generally characterised by thin soils over rock or colluvial material on steeper slopes. Another sensitive area lies within the Koksilah River Recreation Site.

Sensitive Ecosystem Inventory

A number of polygons are identified in the Ministry of Environment Sensitive Ecosystem Inventory (SEI). These include wetlands, terrestrial herbaceous ecosystems and the riparian area adjacent to the Kosilah River.

Resource features other than wildlife habitat features and archaeological sites:

At the time of preparing this woodlot licence plan, the Koksilah River Recreation Site is the only resource feature that has been established within the woodlot licence area under the Government Actions Regulation. There were no other resource features within the woodlot licence area that were made “known” by the district manager under the regulations of the Forest Practices Code of BC Act.

Ungulate Winter Range

The woodlot licence surrounds Ungulate Winter Range #24, which was removed from the woodlot licence area in November 2003.

1.3 AREAS WHERE TIMBER HARVESTING WILL BE AVOIDED

At the time of writing this woodlot licence plan, there are no portions of the woodlot licence area where the woodlot licence holder is aware of a legal requirement to completely avoid harvesting.

1.4 AREAS WHERE TIMBER HARVESTING WILL BE MODIFIED

Areas in this Woodlot License where timber harvesting will be modified to protect and manage resources are shown on the map by shading, hatching or lines.

Modified harvesting where practice requirements in the WLPPR apply:

1. Harvesting will be modified within that portion of the Koksilah Recreation Site that lies within the woodlot licence area. Harvesting will also be modified adjacent to the Koksilah River trail and Trans Canada Trail, both of which lie within the woodlot license area. By using intermediate harvesting systems or single tree or group selection silviculture systems, the integrity of the trails will be maintained and the forest near the trails is expected to be maintained. However, where required to salvage root disease or windthrow, the licensee may create some patch cut openings near the trails.
2. Harvesting will be modified along the boundaries of the Ungulate Winter Range to meet the Goals and Objectives set by Government.

Retention of trees in riparian management zones:

Unless exempted by the district manager, or the harvesting of a road clearing width is required, the woodlot licence holder is committed to retaining the following post harvest stand structure in riparian management zones:

Riparian Class	Intent of Management	Species to Retain	Retention Level Post Harvest (stems/ha)
S2 and S3 (Fish bearing S2 = 5 m to 20 m width)	<ul style="list-style-type: none"> Maintain the integrity of the RRZ Assist in maintaining wildlife attributes within the RMA 	Fd, Cw, Hw, Dr, Mb	25 - 100 %
S4 (Fish bearing up to 1.5 m width)	<ul style="list-style-type: none"> Maintain stream bank integrity Provide shaded cover, large woody debris and litter 		25 - 100%
S6 (non-fish up to 3 m width)	<ul style="list-style-type: none"> Minimize debris transport to lower reaches of stream 		0 - 100%
W2 & W5	<ul style="list-style-type: none"> Maintain the integrity of the RRZ Assist in maintaining wildlife attributes within the RMA 		25 - 100%
Non –classified wetlands	<ul style="list-style-type: none"> Provide shaded cover, large woody debris and litter 		25 - 100%

1.5 CONSERVING AND PROTECTING CULTURAL HERITAGE RESOURCES

The woodlot licensee will implement the following strategies to conserve and protect cultural heritage resources that are the focus of a traditional use and of continuing importance to the Cowichan Tribes, Malahat First Nation and Penelakut First Nation.

Cedar Trees

Result: To enable access to cedar bark for First Nations use

Strategies:

- The licensee will continue to plant a component of western red cedar, where ecologically suited, in accordance with the stocking standards specified in this Woodlot Licence Plan;
- A minor component of pole sized cedar will be retained in cutblocks where it is currently evident;
- The licensee will notify the First Nations once a Cutting Permit or road permit is approved in an area where cedar is to be felled to facilitate bark stripping pre-harvest.

Result: To enable access to monumental cedar logs recognizing that Woodlot 1557 is only a small part of the traditional territory of each First Nation and the woodlot may only have a limited number of such logs.

Strategy:

- The licensee will upon request, assist First Nations in identifying monumental cedar logs should the First Nation wish to utilise them for traditional uses.

Medicinal Plants

Result: First Nation people will have continued access to medicinal plants

Strategies:

- Through information sharing with First Nations, the licensee will avoid proposing cutblocks in areas of rare or scarce plants where these rare or scarce plants have been identified by First Nations;
- The licensee will notify the First Nations of cutting permit applications, road permit applications and any applications for recreation trail construction prior to submission to the MOFR in order that any CHRs can be identified and any collections of plants can be completed by First Nations prior to harvest;

Spiritual Sites

Result: Spiritual sites identified by First Nations will be protected to the extent possible by the woodlot licensee

Strategies:

- The licensee will share information with the First Nations and be available for field reviews upon request;
- Should the First Nations identify any spiritual sites, the licensee will consider excluding areas from harvest or modifying harvesting to minimize any impact to these sites, provided the spiritual sites do not unduly impact harvesting opportunity.

1.6 WILDLIFE TREE RETENTION STRATEGY

Note: the proportion of the Woodlot Licence area that is occupied by wildlife tree retention areas is specified in the “PERFORMANCE REQUIREMENTS” section of this plan.

1.6.1 INDIVIDUAL WILDLIFE TREES

a) Species and Characteristics:

Trees of all species occurring on the woodlot licence area may be selected as individual wildlife trees. Selection will favour trees that provide valuable wildlife tree attributes including signs of internal decay, trees with forks, large rotten branches, loose or cracked bark, recent scars, active wildlife use, existing cavities, nest trees, veteran trees and other large windfirm trees with poor form for sawlogs.

b) Conditions Under Which Individual Wildlife Trees May Be Removed:

Individual wildlife trees may be removed if they are considered a safety hazard, are infected with diseases or they become infested with insects which threaten the health of adjacent trees.

c) Replacement of Individual Wildlife Trees:

If individual wildlife trees are removed they will be replaced with trees of comparable wildlife tree value from a nearby location.

1.6.2 WILDLIFE TREE RETENTION AREAS

a) Forest Cover Attributes:

Preference will be given to locating wildlife tree retention areas in stands that contain or have a good likelihood of developing valuable wildlife tree attributes as described above. To maintain biodiversity, an attempt will be made to provide representation of all tree species found on the woodlot licence area and focus on riparian management areas, areas identified in the Sensitive Ecosystem Inventory (MoE, 2004), relatively rare biogeoclimatic site series and other areas where harvesting constraints provide the best long term potential for stands to develop wildlife tree attributes associated with advanced age. Root disease centres may also be selected to provide a continuing supply of dead and dying trees, coarse woody debris and biodiversity associated with stand openings.

b) Conditions Under Which Trees May Be Removed from Wildlife Tree Retention Areas:

Trees may be removed if: they are considered a safety hazard; they become infested with insects or diseases which threaten the health of adjacent trees; they are windthrown into adjacent stands, cutblocks or regenerated areas; or there is a need to remove the trees to provide access to adjacent stands. If providing access to adjacent stands the removal of high quality wildlife trees will be kept to a minimum.

c) Replacement of Trees Removed from Wildlife Tree Retention Areas:

If trees are removed from wildlife tree retention areas, they will be replaced with trees of comparable wildlife tree value from a nearby location. Where all or part of a wildlife tree retention area is salvaged, the salvaged area will be replaced with other suitable wildlife habitat in the nearest possible location. Suitable replacement areas will have characteristics that are consistent with the wildlife tree retention strategy. If a wildlife tree retention area suffers blowdown or is otherwise killed, but is not salvaged, it will not be replaced.

1.7 MEASURES TO PREVENT INTRODUCTION OR SPREAD OF INVASIVE PLANTS

The following measures will be implemented to reduce the introduction and spread of invasive plants that may result from the woodlot licensees' forest practices:

- Minimize soil disturbance.
- Seed disturbed roadside areas in as soon as practicable with the appropriate mix of fast, growing species of grasses and legumes, preferring native species when they become available.
- Minimize the transport of invasive plant seed by removing burrs from clothing and equipment, and by checking the undercarriage of vehicles and removing invasive plants before leaving an infested area.
- Learn to identify invasive plants and recognize early stages of invasive plant development.
- Establish well stocked stands of trees that will eventually suppress invasive plants.

- Annually monitor invasive plants and carry out control measures, before invasive plants reproduce, on road edges and other areas where the primary forest activities of the woodlot licence holder have created favourable seedbed for the spread of invasive plants.

Invasive plants, mainly broom, are prevalent within the Trans Canada Trail (CNR) right-of-way. Invasive plants are also evident in older plantations immediately adjacent to this right-of-way and adjacent to Mountain Road. Although the licensee will minimize the transport of invasive plant seed from this area, control of invasive plants in these areas will not be carried out. A number of species of invasive plants are evident in the private forest lands and subdivisions surrounding the woodlot licence areas and are expected to encroach onto the woodlot over time.

1.8 MEASURES TO MITIGATE EFFECT OF REMOVING NATURAL RANGE BARRIERS

This measure is not applicable because there are no range tenures within the woodlot licence boundary. The licensee will request an exemption from the requirements of WLPPR section 15.

1.9 PERFORMANCE REQUIREMENTS

1.9.1 STOCKING INFORMATION FOR SPECIFIED AREAS

Unless exempted by the district manager, the stocking standards indicated below apply to areas where the establishment of a free growing stand is not required and harvesting is limited to commercial thinning, removal of individual or small groups of trees, or a similar type of intermediate cutting, and for harvesting special forest products.

For the purposes of section 12 and 34(3) of the WLPPR the Uneven-aged Stocking standards for single-tree selection, as found in the MoF publication “Reference Guide for FDP Stocking Standards”, are adopted. A copy of these stocking standards are included in Appendix I.

1.9.2 SOIL DISTURBANCE LIMITS

- Default WLPPR s.24(1)(b):
- 8% of Net Area to be Reforested

1.9.3 PERMANENT ACCESS STRUCTURES

Alternative WLPPR s.25:

The maximum area occupied by permanent access structures is as follows:

1. For Intermediate Harvesting Cutblocks ≥ 5 ha – 10% of the total cutblock area
2. For other Cutblocks ≥ 5 ha – 7% of the total cutblock area
3. For Cutblocks < 5 ha – 12% of the total cutblock area
4. For the Total Woodlot Licence Area – 7% of the total Woodlot Licence area

Rationale:

Because of the diameter class distribution and site classes found in the woodlot license area, intermediate harvesting is expected to contribute much of the volume required to meet the allowable annual cut. In these intermediate harvesting cutblocks, clearcutting will be limited mainly to salvaging root disease. As a result, a more extensive road network is required to access the timber than would normally be required in clearcuts. Steeper, more difficult terrain also contributes to the need for more roads, especially in the western portion of the woodlot.

Although the licensee will minimize the construction of roads wherever possible, the terrain and shape of the woodlot license area has historically required that some smaller clearcut/retention cutblocks exceed 10% permanent access, especially when the roads access future timber supplies. Overall however, the licensee expects that no more than 7% of the woodlot license area will be occupied by permanent access structures.

Note: For the total woodlot licence area, the 7% does not include existing paved and gravelled public access roads, Mountain Road and Riverside Road respectively.

1.9.4 STOCKING STANDARDS

- Alternative WLPPR s. 35(1)(a): The stocking standards, regeneration dates and free growing dates are indicated in Appendix IIA.

Rationale:

These stocking standards are the current stocking standards, regeneration dates and free growing dates described in the MoF publication “Reference Guide for Forest Development Plan Stocking Standards”, which will be used on the majority of the woodlot licence area. However, there are areas within the woodlot licence area that are infected with root disease where stumping will not be carried out because of terrain, soil conditions or other reasons, necessitating standards in which the acceptable species, generally western red cedar and western white pine, will become the preferred species.

These alternative stocking standards are consistent with both the objectives set by government for timber [maintaining or enhancing an economically valuable supply of commercial timber] and the timber supply projections and forest management assumptions that are found in the WL management plan that was used to determine the AAC.

1.9.5 WIDTH OF STREAM RIPARIAN AREAS

Default WLPPR s.36(4)(b):

The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.36(4)(b).

1.9.6 WIDTH OF WETLAND RIPARIAN AREAS

Default: WLPPR s.37(3)(b) The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.37(3)(b).

1.9.7 WIDTH OF LAKE RIPARIAN AREAS

Default: WLPPR s.38(2)(b) The minimum width of the riparian reserve zone, riparian management zone and riparian management area are as described in WLPPR s.38(2)(b).

1.9.8 RESTRICTIONS IN A RIPARIAN RESERVE ZONE

Default: WLPPR s.39(1) Cutting, modifying or removing trees in a riparian reserve zone is limited to the purposes described in Section 39(1) of the WLPPR.

1.9.9 RESTRICTIONS IN A RIPARIAN MANAGEMENT ZONE

Default: WLPPR s.40(1)(b)(c) or (d) Construction of a road in a riparian management zone is limited to the conditions described in Section 40(1) of the WLPPR without additional conditions to allow road construction being provided in the woodlot licence plan.

1.9.10 WILDLIFE TREE RETENTION

Unless exempted by the district manager, the proportion of the Woodlot Licence area that will be occupied by wildlife tree retention is:

Default WLPPR s.52(1)(c): 8 % of the woodlot licence area

1.9.11 COARSE WOODY DEBRIS

Unless exempted by the district manager or the WLPPR, the minimum amount of coarse woody debris to be left on areas where there is a requirement to establish a free growing stand is

Default: WLPPR s.54(1)(b)

Area on Coast – minimum retention of 4 logs per ha ≥ 5 m in length and ≥ 30 cm in diameter at one end.

1.9.12 RESOURCE FEATURES

Unless exempted by the district manager, the woodlot licence holder will

Default WLPPR s.56(1)(b): Ensure that forest practices do not damage or render ineffective a resource feature.

Note: Only the performance requirements in Part 3 (Practice Requirements) of the WLPPR for which an alternative can be proposed are shown in this Woodlot Licence Plan. The remaining performance requirements in Part 3 are not shown, nor are the performance requirements in Part 4 (Roads).

APPENDICES

- **Stocking Standards for Specified Areas** that apply to commercial thinning, removal of individual trees, intermediate cuttings, and harvesting special forest products (WLPPR sections 12 and 34(3)).
- **Stocking Standards for Free Growing Stands** that apply to this WLP
- **The WLP Map**

Appendix I: Stocking Standards for Specified Areas

These layered stocking standards apply for the purposes of sections 12 and 34(3) of the Woodlot Licence Planning and Practices Regulation to areas where the establishment of a free growing stand is not required and harvesting is limited to commercial thinning, removal of individual trees, or a similar type of intermediate cutting, or the harvesting of special forest products.

Biogeoclimatic Ecosystem Classification			Preferred Species	Acceptable Species	Layer	TSS (sph)	MSSpa (sph)	MSSp (sph)
Zone	Subzone	Variant Site Series						
CWH	xm	01	Fd	Cw Pw	1	400	200	200
		04	Fd	Cw Pw				
		05	Cw Fd	Pw	2	500	300	250
		06	Cw Fd Hw	Dr				
		07	Fd	Cw Pw	3	700	400	300
		08/09	Cw	Bg				
13	Cw Bg Fd							
		14	Bg Cw		4	900	500	400
CWH	xm	03	Fd Pl	Cw	1	300	150	150
		12	Cw	Hw Pw	2	400	200	200
		15	Cw		3	600	300	300
					4	800	400	400

SU = Standards Unit = a harvested area with the same stocking standards	Minimum Distance Between Well Spaced Trees = 2.0 meters except all healthy trees in the mature layer are considered well spaced	MSSpa = Minimum Stocking Standard of well spaced trees of preferred and acceptable species	Layer 1 = Mature trees \geq 12.5 cm dbh Layer 2 = Pole trees \geq 7.5 to < 12.5 cm dbh
TSS = Target Stocking Standard (sph) = healthy well spaced trees / ha		MSSp = Minimum Stocking Standard of well spaced trees of preferred species	Layer 3 = Sapling Trees >1.3 m tall & < 7.5 dbh Layer 4 = Regeneration trees < 1.3 m tall.

Appendix IIA: Stocking Standards, Regeneration Dates and Free Growing Dates for Free Growing Stands

These stocking standards are proposed as an alternative performance requirement for the purposes of section 35(1) (a) of the Woodlot Licence Planning and Practices Regulation to areas harvested under this woodlot licence plan where the establishment of a free growing stand is required under section 29(3) of the *Forest and Range Practices Act*.

Regen date = Regeneration Date FG Date = Free Growing Date	MITD = Minimum distance between well spaced trees of the preferred and acceptable species	Crop Tree to Brush % = the height of free growing trees relative to the competing vegetation within a 1 m radius cylinder around the tree.
TSS = Target Stocking Standard (sph = healthy well spaced trees / ha)	MSSpa = Minimum Stocking Standard of well spaced trees of preferred and acceptable species	MSSp = Minimum Stocking Standard of well spaced trees of preferred species

Appendix III: The Woodlot Licence Plan Map

2. SUPPLEMENTAL INFORMATION TO SUPPORT THE PROPOSED WOODLOT LICENCE PLAN

2.1. REVIEW AND COMMENT

a) Advertising

A copy of the newspaper advertisement under which the WLP was given public notice is included with this final submission.

b) Referrals

A Letter of Notification and a complete copy of the Draft Woodlot Licence Plan were delivered to the Cowichan Tribes, Penelakut Band Council, and Malahat First Nation Council for a 60 day review and comment period.

A digital Letter of Notification and Draft Woodlot Licence Plan were e-mailed to the following the Cowichan Valley Regional District - Parks and Recreation Department, Ministry of Environment - Ecosystem Section and Ministry of Tourism, Sport and the Arts - Recreation Sites and Trails for a 30 day review and comment period.

c) Copy of Written Comments Received

Written comments were received from Larry George of the Cowichan Tribes and his letter is included in this final submission.

Written comments were received from The Cowichan Valley Regional District after the licensee conducted a field visit to the woodlot with Cory Cherriere, Parks Trail Planning Technician. The letter from the CVRD is included in this final submission.

An e-mail was received from the Ministry of Environment on July 3, 2007 and is included in this final submission.

Written comments from the Ministry of Tourism, Sport and the Arts are included in this final submission.

The Ministry of Forests and Range submitted written comments which are included in this final submission.

d) Revisions Made as a Result of Written Comments Received

The most significant comments were received from the Cowichan Tribes regarding ongoing information sharing around the conservation and protection of Cultural Heritage Resources. In particular, Cowichan Tribes has requested notification of proposed road permits and recreation trail construction.

The Draft Woodlot Licence Plan already commits to consult with First Nations prior to cutting permit application and has been modified to include road permits and recreational trail construction as follows: "Notify First Nation of cutting permit applications, **road permit applications and any applications for recreation trail construction** prior to submission to the MOFR in order that any CHRs and ..."

In addition to the revision noted above, Section 1.5 was revised to reflect comments received from the Ministry of Forests and Range. These additional strategies provide First Nations peoples with reasonable access to cedar bark, monumental cedar trees and traditional use plants for traditional uses in consultation with the MoFR and the licensee; sets out a process for the licensee to notify First Nations of intended harvesting activities prior to cutting permit submissions and/or approvals to allow cultural heritage resources to be identified, protected and/or collected; ensures a future supply of western red cedar is maintained on the woodlot by planting red cedar where ecologically suitable; and sets out a process for protection of spiritual sites. It should also be noted that due to the relatively low volumes of timber harvested annually from the woodlot licence, some cedar trees will continue to be maintained outside the wildlife retention areas for the term of this WLP.

The CVRD and the Ministry of Tourism have expressed concerns regarding safety of recreational users and continuing integrity of the Trans Canada trail. The WLP already commits to maintain the integrity of the trail and the forests near the trail by using intermediate harvesting systems or single tree or group selection silviculture systems. No revisions were made to the final submission to reflect the CVRD and MoTSA comments.

Although no revisions were made to Section 1.9.1, revisions to the table in Appendix I were made to reflect the comments received from Emma Neill, Ministry of Forests and Range. All deciduous species were removed from the table and the table was reorganized to make it more understandable.

2.2 EFFORTS MADE TO MEET WITH FIRST NATIONS

A description of the efforts to meet with First Nations groups is outlined below. Written comments received from these discussions is included with the final submission.

Malahat Tribal Group

May 23, 2007

The licensee, Susan Paul, hand delivered a copy of the WLP to the Malahat Tribal Group office.

June 15, 2007

Hand delivered a follow up letter to Malahat Tribal Group office.

Cowichan Tribes

May 23, 2007

Susan left a message with Larry George of the Cowichan Tribes regarding WLP. He returned her call with his e-mail address and then Susan e-mailed WLP and maps.

May 30, 2007

Susan Paul met with Larry George of the Cowichan Tribes to discuss WLP, history of woodlot. Made arrangements to meet in the Woodlot next week.

June 5, 2007

Field meeting with Larry George, Phillip Joe and Harry Williams of Cowichan Tribes. Viewed area around Riverside Road. Discussion around CMTs, berries, recreational trail. Confirmed commitment to notify Cowichan Tribes prior to harvest.

July 27, 2007

Received a letter from Cowichan Tribes.

Penelakut First Nation

May 24, 2007

The licensee, Susan Paul, hand delivered a copy of the WLP to the Penelakut Band Council office.

June 8, 2007

Susan had a telephone conversation with Joyce Johnny. She indicated that Chief Lisa Shafer would call me if the Band had any concerns.

June 15, 2007

Susan left a message with Chief Lisa Shafer and faxed a follow-up letter.

2.3 EXEMPTIONS *(optional)*

A copy of all exemptions granted under sections 8(2), 78 and 79 of the WLPPR in the process of preparing the WLP will be included with the final submission.

2.4. RATIONALE IN SUPPORT OF PROPOSED ALTERNATIVE PERFORMANCE REQUIREMENTS

An Alternative Performance Requirement is being proposed for Permanent Access Structures and a rationale is included in Section 1.9.3.

An Alternative Performance Requirement is being proposed for Stocking Standards and a rationale is included in Section 1.9.4.