

Subject: RE: How we dealt with your representations for our Complaint Investigation Report #15033
– Hydrology and Wildlife Concerns About a Large Cutblock

Ken,

In accordance with the recommendations contained in the Forest Practices Board Report FPB/IRC/203-November 2016, Interfor engaged Forsite Consultants Ltd. of Salmon Arm BC to conduct a Patch Size Distribution Analysis on the Boundary Landscape Unit, as well as twelve other landscape units where we operate in the Kootenay region. Forest professionals at Forsite have extensive experience in both conducting and interpreting such analysis.

Final project deliverables were received by Interfor on January 9, 2017. Our planning and GIS teams from both Kootenay operations met on January 16 in Castlegar to discuss the analysis process, the reported findings and to align on how we will utilize the information when assessing new development proposals, prescribing retention areas and writing rationales for blocks greater than 40 ha, consistent with FPPR sec 64. To ensure consistency going forward, we also agreed to conduct internal peer reviews of any rationales that reference the report data.

Trusting this adequately addresses the Boards recommendation. Please call if you have further questions.

Regards,

Randy G. Waterous, RFT
Forestry and Land Use Superintendent
Interior Woodlands
Office:(250)443 2453 Mobile:(250)442 7713 Fax:(604)422 3253

Interfor Corporation
570 – 68th Avenue,
Grand Forks, BC, V0H 1H0
randy.waterous@interfor.com



File: 97250-20-15033

November 22, 2016

Randy G. Waterous, RFT
Forest and Land Use Superintendent, Interior Woodlands
Interfor Corporation
570 – 68th Avenue
Grand Forks BC V0H 1H0

Dear Randy Waterous:

Re: Complaint Investigation 15033 – Hydrology and Wildlife Concerns About a Large Cutblock

The Forest Practices Board has completed and reported its investigation for this complaint. The Board Chair offered Interfor Corporation the opportunity to make representations and I received those representations on October 17, 2016. I would like to explain how we dealt with your submission.

Your representations were reviewed in detail by the Board's staff, executive and the Board Chair. The report has been revised to reflect the Board's consideration of the representations provided by Interfor.

We noticed five key points addressed in your representations. I will not go into point-by-point detail, but this letter will explain generally how we considered them. Four of the five points were intended to add clarity to points being made in the Board report. We agreed in principle with all four of these points and modified our report accordingly. For three of these points you offered some wording changes for the report but we preferred our own words to address your suggestion. For example, you suggested we modify our description of the map in Appendix A to explain that Interfor's intent was to use it to demonstrate landscape level considerations. We agreed and modified our description to say, "In his rationale for exceeding the 40 hectare maximum cutblock size, Interfor's forest professional used this map to illustrate the spatial and temporal nature of the natural disturbance history." Also, you suggested that we recognize a more detailed landscape analysis may demonstrate that both the past and the planned harvest is consistent with the natural disturbance pattern. Our use of the words "it appears" and "could impact" already suggests uncertainty about impacts. We did however modify the report to indicate a more detailed analysis will provide clarification, suggesting that practice and planning may already be consistent.

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One of your points suggested a revision to a Board finding that Interfor did not meet all the requirements of section 64 of the FPPR. However, your representations did not provide sufficient new information to change our opinion on this finding, based on our interpretation of section 64.

In closing, I would like to thank you for the time and consideration shown while participating in this investigation. Should you have any suggestions to further improve our investigation process, please contact me at (250) 213-4713.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Ken Zielke". The signature is fluid and cursive, with a large initial "K" and "Z".

Ken Zielke, RPF
Director, Investigations