

C5 FOREST MANAGEMENT PLAN 2006–2026

APPENDIX 3B. PLANNING TEAM RESPONSE TO  
PUBLIC FEEDBACK  
C5 FOREST MANAGEMENT PLAN



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## C5 FMP – Public Consultation

13 March 2006

Given the scope, complexity and length of the C5 Forest Management Plan (FMP) planning process, a substantial, multi-faceted public involvement strategy was adopted to facilitate the exchange of information and to receive public comments on planning proposals. Key components of the public consultation strategy are presented below.

### Relevant Documentation

Various documents were prepared to assist with the development and delivery of an effective public consultation campaign and to compile feedback that was received whenever planning proposals made available for public review. The following documents are particularly noteworthy.

- **Public Consultation – Terms of Reference.** This document identified ASRD's commitment to public involvement for the C5 FMP project and outlined in general terms how public involvement would be carried out. Public Consultation - Terms of Reference were approved in July 2002.
- **Analysis of Survey Responses and General Comments: The Crowsnest Forest** (Canadian Forest Service, March 2003). This document identifies the results obtained from a voluntary survey conducted by ASRD from April to December 2002 to obtain ideas, opinions, and recommendations from the public regarding the development of the C5 Forest Management Plan and the 'desired future forest' for the C5 FMU.
- **Stakeholder Input Received – C5 FMP Matrix.** This document contains feedback received from CrowPAC, Quota Holders and other stakeholders on initial ideas provided by the Planning Team for Criteria #1-6 (i.e., the C5 FMP Matrix) and includes the Planning Team's response to this feedback.
- **Public Involvement Strategy and Checklist – Draft Plan Review.** These internal documents were prepared to provide detailed guidance for the Planning Team and ASRD officials on how public review of the draft plan would be carried out in October 2005. A significant amount of planning and effort went into the preparation of a highly informative public Open House.
- **Public Input Received – C5 Draft FMP.** This document contains a compilation of all feedback received from the general public and interest groups on the draft plan during the period October 2005 - January 2006. It, in turn, provided the basis for the development of a subsequent document in which the Planning Team responded to public feedback.

### Participants

Development of the C5 forest management plan occurred with the involvement of numerous non-government groups and individuals. Opportunities were provided at distinct stages throughout the

planning process for individuals and groups to become engaged and provide input/feedback as planning proposals were being developed and evaluated.

- **CrowPAC** – Known and respected individuals from local communities surrounding the C5 forest management unit were invited to become members of a public advisory committee known as the Crowsnest Pass Public Advisory Committee (CrowPAC). CrowPAC met 21 times during the period January 2002 to March 2006 to become informed of forestry related subjects, to assist the Planning Team and Project Manager in developing the C5 forest management plan, and to offer advice on various aspects of the planning process. CrowPAC members also attended 3 field trips that were conducted within the C5 forest management unit. Complete minutes were prepared for scheduled CrowPAC meetings from meeting #4 onward.
- **Quota Holders** – Timber harvesting within the FMU is predominantly carried out by Quota Holders. To ensure that their interests, needs and concerns were considered, a number of meetings were held with Quota Holders at key points throughout the life of the project from 2002 - 2006. These consultations allowed for the exchange of information and ideas and ensured that government staff were aware of the operational feasibility of implementing new silvicultural practices and forestry processes that were being recommended as a departure from the status quo.
- **First Nations** – Band Councils from the following Aboriginal communities were informed of the C5 FMP project and encouraged to participate in the planning process: Kainaiwa (Blood I.R. 148), Piikani (Peigan I.R. 147) and Bears paw (Stoney - Eden Valley I.R. 216). Telephone and face-to-face conversations, letters and E-mail messages, special meetings, and working sessions were held with representatives of these bands to answer questions, explore how ASRD could meaningfully consult with First Nations, and to request feedback on planning proposals in the Matrix and draft plan. Individuals from the Blood and Peigan bands attended a number of CrowPAC meetings during the period 2002-2004.
- **Municipalities and other stakeholder groups** – Local authorities were notified of the C5 FMP planning exercise and presentations were offered to each surrounding municipality. Municipal input was received and on one occasion MD representatives attended a CrowPAC meeting (March 27, 2003). Various stakeholder groups (e.g., conservation groups, recreation clubs, grazing associations) were also notified of the project and opportunities were provided for them to provide input and react to planning proposals.
- **Forest users and general public** – Given the popularity of the C5 forest management unit with many recreationalists and the general public, opportunities were provided for Albertan's to review and comment on the project, activities occurring in the C5 FMU, and on the draft forest management plan itself.

## Public Events/Campaigns

- a) Stakeholder session – project initiation (April 11, 2002). A cross-spectrum of interest groups were invited to attend a professionally facilitated information meeting and workshop session to learn about the C5 FMP project and to offer feedback on initial “issues” and “values” identified by CrowPAC. Thirty five individuals attended a half-day stakeholder session in Blairmore.

- b) Public Open House – project initiation (April 11, 2002). A drop-in Open House was held in the late afternoon and evening to allow interested members of the public to become informed of the planning project and interact with members of the Planning Team and CrowPAC. About 40 people attended this public Open House in Blairmore.
- c) C5 FMU Survey – (April - December 2002). Opportunity was provided for individuals to complete and submit a questionnaire (“We Want Your Advice”) in which they could: identify how they used the C5 FMU, provide personal observations on changes they have noticed in the forest over a 5-year period, and indicate what kind of changes they would welcome and support in the future. The 4-question survey was completed and returned by 482 respondents. An additional 68 individuals submitted opinions, however these were in the form of general comments that did not follow the questionnaire outline.
- d) Presentations (2002). The project Manager and Coordinator gave presentations (an overview of C5 FMP project, and subsequently, highlights of the C5 FMP Matrix) to the following organizations:
  - MD of Willow Creek
  - MD of Pincher Creek
  - MD of Ranchlands
  - Municipality of Crowsnest Pass
  - joint meeting of Crowsnest Environmental Action Society, Alberta Wilderness Association, and Castle Crown Wilderness Coalition
- e) Feedback on Draft C5 FMP Matrix (2004). CrowPAC, Quota Holders, and Stakeholders listed on the project contact list were invited to provide feedback on draft Criteria #1-6 (i.e., the C5 FMP Matrix) during the summer of 2004. All feedback that was received was then compiled. Thereafter, the Planning Team systematically reviewed and responded to all received comments in: C5 FMP Matrix – Response to Feedback received through the Public Consultative Process (26 October 2004).
- f) Open House for First Nations (Blairmore, October 26, 2005). With the completion of the draft plan, a special Open House was held only for First Nations communities to share information on the contents of the draft plan and to discuss their interests and concerns. Limited interest was shown and attendance was poor.
- g) Public Review of the Draft FMP (October 2005 – January 2006). A draft plan for public review was completed and made available for public review in mid October 2005. A drop-in Open House, held in Blairmore during the afternoon and evening on October 27<sup>th</sup>, attracted 65 individuals. Draft Plan Comment Forms were widely made available. The large size of the draft plan and its supporting Appendices make it cost prohibitive to print copies for public distribution. The draft plan could be accessed on-line, at ASRD offices in Calgary and Blairmore, and at the South-western Alberta Sustainable Community Initiative office in Pincher Creek. Written submissions on the draft plan were received until January 27, 2006. All public input that was received was compiled in a document for Planning Team review and subsequent response.

## Communications

- a) **Project Website** ( <http://www3.gov.ab.ca/srd/regions/southwest/c5/index.html> ). To facilitate the widest possible circulation of project documentation, the C5 Forest Management Plan website was established in 2002. Among other things, the following information was made available through the website:
- general project information
  - CrowPAC meeting minutes
  - maps and photos
  - project documents
  - public notices
  - public review materials and draft planning documents
- b) **Public Notification.** Newspaper ads and News Releases were placed in local weeklies and select dailies in southwestern Alberta to inform the public of the two Open Houses, one in April 2002 and one in October 2005, and to encourage Albertans to complete and submit the questionnaire: “*We Want Your Advice*”. Ads and news releases were placed in the following papers: Crowsnest Pass Promoter, Crowsnest Pass Herald, Pincher Creek Echo, Claresholm Press, Fort MacLeod Gazette, Cardston Temple City Star, Lethbridge Herald, and Calgary Herald.
- c) **Posters.** C5 FMP posters were widely placed to announce the April 2002 and October 2005 public Open Houses to make Albertans aware of the questionnaire: “*We Want Your Advice*”. Posters were placed at the following locations for the October 2005 Open House: Arrowwood Public Library; Bellevue Public Library and Post Office; Blairmore Post Office and Provincial Building; Brooks Public Library; Cardston Public Library; Carmangay Municipal Library; Champion Public Library; Claresholm Public Library; Coleman Post Office and Chris’s Restaurant; Coutts Municipal Library; Glenwood Municipal Library; Granum Public Library; Hillcrest Drum Creek Mercantile; Lethbridge Public Library; Lomond Public Library; Magrath Municipal Library; Medicine Hat Public Library; Milk River Municipal Library; Milo Public Library; Picture Butte Municipal Library; Pincher Creek Municipal Library; RCMP Centennial Library( Fort MacLeod); Raymond Public Library; Redcliff Public Library; Stavely Municipal Library; Taber Public Library; Thelma Fanning Memorial Library (Nanton); Theodore Bradley Municipal Library (Stirling); Vauxhall Public Library; Vulcan Municipal Library; Warner Memorial Library; and at various unspecified public bulletin boards and government offices surrounding the planning area.
- d) **Open House displays.** Assorted displays were featured at public Open Houses to communicate key messages to visitors. An extensive series of maps and displays was made available at the October 2005 Open House to highlight key aspects of the draft plan. These displays were photographed to provide a visual record of the Open House.
- e) **Mail-outs to contacts on the project mailing list.** A project mailing list was prepared so that correspondence and information could be sent out on a periodic basis to organizations and individuals likely to be interested in the development – and outcome – of the C5 FMP project. Mail outs occurred to announce the commencement of the project, to notify recipients of public events, to provide project updates, and to request feedback on planning proposals. Information was sent to 71 organizations and 11 individuals, notifying them of

the October 2005 Open House and the new date (i.e., extension) for receiving written comments on the draft plan.

- f) **Questionnaires / Comment Forms.** A questionnaire, titled “*We Want Your Advice*”, and a draft plan Comment Form were made available at Open Houses and on-line (at the project website) to obtain focused feedback from interested individuals. Comments obtained in this way were tabulated and shared with the Planning Team and CrowPAC.
- g) **Project documentation.** Assorted handouts, a draft plan summary and the draft plan itself were released to inform the public of planning recommendations being considered by the Planning Team.
- h) **Newspaper articles.** The C5 FMP received newspaper coverage in several weeklies and dailies throughout the life of the project, but particularly coinciding with the two public Open Houses. These newspaper articles, whether critical or favorable about the project or the draft plan, provided useful exposure of the project.

## COMMENT FORM

### C5 Forest Management Plan

*Please take a moment to complete the following questions. Use the back of this page if you need additional space.*

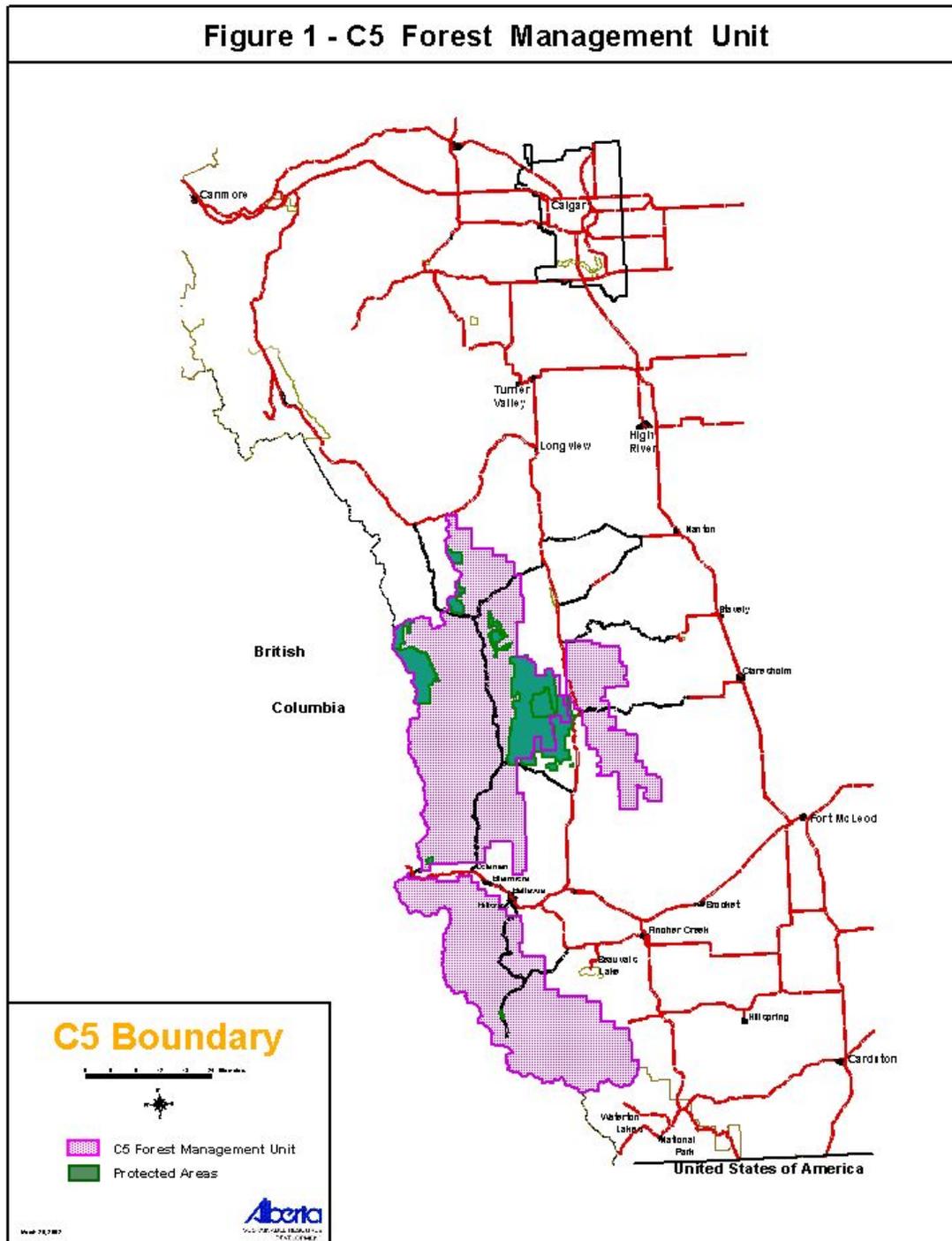
- 1) Are there any objectives in the draft C5 Forest Management Plan which you do not support? Why?
  
- 2) Do you foresee any issues or difficulties if recommendations contained in the draft C5 Forest Management Plan are implemented in the future? Explain.
  
- 3) Does the C5 Forest Management Plan's strategy for allowing sustainable timber harvesting to occur in an environmentally and socially acceptable manner satisfy you? Explain
  
- 4) Has the Planning Team overlooked any important information, issues or ideas – which pertain to the 53 objectives in C5 Forest Management Plan – that could influence any of the recommendations contained in the draft plan? Explain.
  
- 5) Are there any other comments that you would like to offer?

We would appreciate knowing your Postal Code: \_\_\_\_\_

Please place your completed Comment Form in the Comment Form box at the public Open House. Alternatively, you can fax (403-562-7143) or mail this form – **by November 27, 2005** – to:

Tim Juhlin, C5 FMP Project Coordinator  
Public Lands and Forest Division, AB Sustainable Resource Development  
Box 540, Blairmore, Alberta T0K 0E0

# Summary Document for Draft C5 Forest Management Plan (October 2005)



# C5 FOREST MANAGEMENT PLAN

ASRD is now seeking public input on the new draft C5 forest management plan (FMP).

Interested members of the public are invited to an Open House at the Crowsnest Centre in Blairmore on October 27<sup>th</sup>, 2005 to meet the project planning team and CrowPAC members, to become informed of this planning project, and to provide feedback on the draft FMP.

Below, you will find a summary of the plan.

## Background

In 1986, the Government of Alberta adopted a forest management plan for the C5 forest management unit (FMU) located in southwestern Alberta (see map on cover page). The plan will reach the end of its 20-year life-span in April 2006. With the assistance of a public advisory committee known as CrowPAC, and stakeholders, Alberta Sustainable Resource Development (ASRD) has developed a new draft plan to guide forest management activities for the next 10 years. At that time this plan will be evaluated and a new plan and TSA developed. This plan is scheduled to come into effect in May 2006.

## Purpose of the C5 FMP

The new C5 FMP describes the “desired future forest” that will be achieved in the C5 FMU.

Forest management strategies outlined in this plan will promote the maintenance of forest health and ecosystem integrity through sound forest management approaches, and will support an integrated use approach of the C5 forest management unit.

The C5 FMP follows the Alberta’s Forest Management Planning Standard (Version 3, June 2005 ) and is predicated on the Canadian National Sustainable Forest Management Standard (Can/CSA-Z809-02) – which in turn is based on the Canadian Council of Forest Ministers (CCFM) criteria and indicators framework. The six broad sustainable forest management criteria that have been adopted by CCFM provide a framework for this FMP and are presented below.

6 Criteria:	Associated Objectives found in the C5 FMP
1) Conservation of biodiversity	Objectives 1 to 13
2) Maintenance and enhancement of forest ecosystem condition and productivity	Objectives 14-20
3) Conservation of Soil and Water Resources	Objectives 21-24
4) Forest ecosystem contributions to global ecological cycles	Objective 25
5) Multiple benefits of forests to society	Objectives 26 to 42
6) Accepting society's responsibility for sustainable development	Objectives 43 to 53

CSA-Z809-02 certification of the C5 forest management unit will not be pursued at this time.

## Public Involvement

A public involvement process was adopted in 2002 to identify community values and receive feedback on planning proposals. Direction contained in this plan has been developed through the efforts of government staff and through a public involvement process that included a public advisory committee, Quota Holders, stakeholder participation, Aboriginal meetings, a public open house, and a web site that was used to facilitate the exchange of information.

## Objectives of the C5 FMP

Direction contained in this plan is focused on 53 resource management objectives. These objectives and their associated indicators and targets provide the basis for numerous forest management activities that – if successfully implemented – will help resource managers and timber operators achieve the plan’s desired outcomes that include but are not limited to:

- Management of the timber resources while minimizing the impacts of forestry operations on non-timber resource values, land uses and human activities.
- Implementation of a Spatial Harvest Sequence
- Addressing a Forest Health issue associated with the threat of Mountain Pine Beetle

These complete list of objectives are provided in the following table:

**Table: Summary of Forest Management Objectives in the C5 FMP**

FMP Unique Number	Objective
1	To maintain the full range of cover groups and seral stages.
2	To minimize landscape fragmentation.
3	To minimize the impacts of motorized access.
4	To retain stand level structural attributes.
5	To retain forest structure associated with wildfire and blow down events.
6	To maintain habitat quality for species which are dependent on larger landscapes.
7	To retain, create, and enhance habitats capable of supporting selected species.
8	To retain a wild forest for each tree species in each seed zone.
9	To retain wild forest genetic resources through <i>ex situ</i> conservation.
10	To maintain adequate genetic diversity in seedlots used for reforestation plantings.

FMP Unique Number	Objective
11	To adopt forest management practices that maintain the ecological integrity of established protected areas.
12	To retain specific wildlife features.
13	To maintain rare plant communities.
14	To sustain the capacity of the ecosystem to recover from both natural and human caused disturbances.
15	To minimize losses to human life, communities, soil, watersheds, natural resources, and infrastructure from wildfire.
16	To minimize the impacts of pests (i.e., insects and disease), which have the ability to kill healthy trees.
17	To maintain the long term sustainability of the land base by managing those forest health agents that can reduce growth, alter form, or kill trees after several years of infection/attack.
18	Prevent the establishment of and control the spread of noxious and restricted weed species.
19	To incorporate new research findings or recommendations, where applicable, into future forest management strategies and practices that are responsive to climatic and environmental factors and large disturbance events.
20	To use prescribed fire for achieving forest protection, forest productivity, forest health, and biodiversity objectives.
21	To conserve soil and organic matter, and maintain soil productivity.
22	To minimize soil erosion and slope failure.
23	To ensure that all forest industry practices are conducted in a manner that places a priority on the protection of water quality.
24	To manage forest cover in a manner that places a priority on the conservation and protection of watersheds.
25	To adopt and implement provincial carbon protocols as they are developed.
26	To maintain sustainable timber harvest levels, i.e., timber harvesting shall not exceed the forest's productive (renewal) capacity.
27	To maintain or increase the net forest (commercial timber harvesting) land base in the C5 FMU.

FMP Unique Number	Objective
28	To ensure all harvested areas are re-forested.
29	To achieve optimal utilization of wood fiber during logging operations.
30	To consider visual impacts during the development of harvest plans.
31	To allow the general public and various user groups to benefit from the C5 forest.
32	To provide reasonable access for recreational and industrial purposes while maintaining the ecological integrity of the forest.
33	To promote cooperation between forest harvesting operators and other forest users.
34	To ensure broad participation of disposition holders in forest management decision-making processes.
35	To integrate recreational activities with forest management practices.
36	To integrate rangeland management activities with forest management practices.
37	To integrate trapping with forest management practices.
38	To integrate energy / mineral (exploration and development) activities with forest management practices.
39	To integrate the commercial recreation and tourism sectors with forest management practices.
40	To ensure that local/regional businesses have an opportunity to share in the economic benefits that can be derived from the C5 forest.
41	To maintain the ongoing (long-term) viability of the forest sector by encouraging companies to consider value-added manufacturing and/or improved wood utilization and processing.
42	To provide economic opportunities for forest dependant businesses while maintaining the integrity of the C5 forest ecosystem.
43	"The Government of Alberta is committed to meeting all of its treaty, constitutional and legal obligations respecting the use of public lands." (p. 14) <a href="#"><u>Aboriginal Policy Framework</u></a>
44	To undertake effective and meaningful consultation with Aboriginal communities.
45	To proactively and meaningfully involve directly affected users and the interested public in forest planning and decision-making processes.
46	To raise public awareness of forest management issues and activities.

FMP Unique Number	Objective
47	To be responsive to local and regional input concerning forestry planning and operations.
48	To be responsive to changing social values concerning sustainable forest management.
49	To pursue 'active' adaptive management when managing forest resources in the C5 FMU.
50	To remain informed of scientific advances, emerging technologies, and new knowledge in managing our forest ecosystems.
51	To protect historical resources where appropriate.
52	To obtain current information on forest resources.
53	To manage the C5 FMU as part of a larger regional landscape.

Based on direction provided through the above objectives and resulting forest management activities (not presented in this summary), ASRD undertook a timber supply analysis to identify a sustainable harvest level (AAC upon approval from the Minister) and spatial harvest sequence that will be utilized in timber harvest planning and operations.

### **Annual Allowable Cut**

The C5 Forest Management Plan (FMP) was developed recognizing conflicting values, priorities and uncertainties. The direction contained in the C5 FMP is anchored in the broad environmental, social and economic values outlined in Canada's six national CCFM criteria.

The decision-making process used in arriving at a Preferred Forest Management Scenario (PFMS) for the C5 FMP involved the prioritization and weighting of the various forest values including the maintenance of forest health, the amount and distribution of seral stages (i.e., old-growth), timber production, FireSmart landscapes, to name a few, to reflect sustainable forest management principles and public interests.

Due to the imminent threat and potentially high impact of Mountain Pine Beetles (MPB), a proactive/defensive approach has been taken to reduce the threat of a MPB infestation. As a result, the planning team determined that the maintenance of a viable and healthy C5 forest is a high priority and in the interests of the broader public. This management decision involved moderately increasing the current Annual Allowance Cut (AAC) for 20 years to 2026 and to focus harvesting primarily in pine stands that are rated high and extreme for MPB to minimize losses that will likely occur.

The timber supply analysis has resulted in the establishment of a preferred forest management scenario proposing an annual harvest level of ~218,650 cubic meters that is modeled in a spatial harvest sequence.

## **Spatial Harvest Sequence**

The spatial harvest sequence map identifies future timber harvest areas. Coniferous Quota Holders in the C5 FMU are required to follow the spatial harvest sequence map presented in Appendix 6 of the draft FMP. Deviations from the spatial harvest sequence cannot exceed the specified variance levels outlined in the FMP.

## **Adaptive Management for Continual Improvement**

Adaptive management provides a mechanism for ensuring that this plan remains responsive to change, innovative management approaches, best management practices and creditable new information as it becomes available.

When provisions in this FMP are no longer relevant or are seen to be unattainable, such statements will be amended to ensure that this plan continues to be appropriate, effective and achievable. In five years following the effective date of this plan, a Stewardship Report will be produced and it will use this adaptive management approach to support continual improvements in timber harvest planning and operational practices. Unless changes are of a compelling or urgent nature, textual revisions to this plan will only be considered at the five-year stewardship reporting period in 2011.

Alberta will also be supporting research initiatives that will study fire regimes and biological diversity and old-growth to verify old-growth targets. In 10 years, this plan will be revisited and a new FMP and TSA produced. If the mountain pine beetle no longer represent a threat, Alberta will revert back to its original priority to move towards a more balanced array of all values including old-growth seral targets that more closely aligns with those predicted under the current natural disturbance regime in the C5 FMU

## **Conclusion**

The C5 FMP is not a statutory plan. It contains direction that will be followed by ASRD and will guide the activities of timber disposition holders and other users of the C5 forest. The FMP will be consulted in future decision-making processes once it is approved by the Executive Director of Forest Management Branch (Public Lands and Forests Division, ASRD).

The complete C5 FMP is available for review at the Blairmore Ranger District Office (11901 19<sup>th</sup> Avenue Phone (403) 562-3210) and ASRD's Southern Rockies office in Calgary (8860 Bears paw Dam Road, NW Calgary T3L 1S4 (403-297-8800)), and can be viewed on the C5 Web site located at: <http://www3.gov.ab.ca/srd/regions/southwest/c5/abo.html>

Contacts:

Rick Blackwood , Area Manager  
PLFD, Southern Rockies Area  
Calgary Office (403) 297-8800

Darryl Johnson, C5 Project Manager  
Tim Juhlin, C5 Project Coordinator,  
PLFD Blairmore Ranger District Phone (403) 562-3210

## Planning Team Response to Public Feedback C5 Forest Management Plan

The following is based on written submissions received from October 2005 to January 26, 2006 and additional feedback from CrowPAC and quota holders.

**Red text shows decisions, actions (proposed changes to draft plan). Brown text identifies changes introduced to the table based on the February 21 CrowPAC meeting and March 1 quota holder meeting.**

(April 7, 2006)

**PREAMBLE** — All written feedback that was received during the C5 FMP public review stage has been compiled and is housed in a separate document. Only those remarks that pertain directly to the focus and scope of the C5 FMP have been incorporated into this Planning Team Response table.

### Planning Team’s Response to Public Feedback Received on the Draft C5 FMP

Number	Public Feedback (comments quoted and summarized from submissions)	Approximate location in C5 FMP	Planning Team’s Response to Feedback	
			Pertinent considerations Decision/Actions and changes to draft plan shown in red	
1.	<p>Timber harvesting within and around the Allison Creek cross-county ski FLUZ is of great concern. Local landowners (<b>North Tecumseh Road Landowners Group</b> – 9 households) and clubs (<b>Crowsnest Pass Cross Country Ski Association</b>) oppose existing clearcut harvesting plans for Chinook-Allison FLUZ and the surrounding recreation area which will be carried out within the next 10 year period as part of C5 FMP implementation.</p> <ul style="list-style-type: none"> <li>▪ loss of mature tree canopy directly affects snow conditions (snow drifting, solar degradation of ski tracks, ice crusting)</li> <li>▪ existing trail system goes beyond the FLUZ, thus prefer to have forested areas for future FLUZ <b>expansion</b> remain intact</li> <li>▪ concerned about the loss of forest/alpine aesthetics and beautiful old growth forests in the FLUZ and adjacent areas for skiers, hikers and joggers who regularly use the area</li> <li>▪ Allison FLUZ is an important regional tourist resource whose long-term viability will be put at risk by clearcut logging</li> </ul>	Obj. 35	<ul style="list-style-type: none"> <li>• The recreational value and potential of the <b>Allison – Chinook Recreation Area and FLUZ</b> is recognized.</li> <li>• Concerns raised by the <i>Crowsnest Pass Cross Country Ski Association</i> have been published in the local paper</li> <li>• The recreation area (FLUZ) falls within the Firesmart Community Zone. Given this, an integrated C5 FMP-Firesmart response should be developed for this area</li> <li>• The IRP recognizes the recreational value of the PRA and FLUZ</li> <li>• C5 FMP addresses timber harvesting aesthetics.</li> <li>• ASRD has been in contact with representative from both groups and is establishing a harvest prescription is responsive to their concerns (as well as FireSmart and MPB concerns) and maintains the integrity of recreation trails.</li> <li>• <i>Advice to the Minister</i> on this issue was prepared in late January 2006</li> </ul> <p>(Harvesting proposals – Objective 35 – for the FLUZ and PRA were reviewed by CrowPAC and Quota Holders)</p> <p>Objective 35 will include new management actions that address</p>	

Number	Public Feedback (comments quoted and summarized from submissions)	Approximate location in C5 FMP	Planning Team's Response to Feedback	
			Pertinent considerations Decision/Actions and changes to draft plan shown in red	
	<ul style="list-style-type: none"> <li>▪ Local residents who purchased properties to be close to the FLUZ and surrounding recreation area ("special" area) do not want the character and beauty of this area compromised through clearcut logging</li> </ul> <p>RECOMMENDATIONS:</p> <ul style="list-style-type: none"> <li>▪ Firesmart: The outcome of Firesmart discussions for the Chinook-Allison recreation area, involving North Tecumseh Road Landowners Group, resulted in the establishment a fire protection program that met the objectives of all concerned participants. The Firesmart plan excludes clearcut logging, which should now be factored into the C5 plan.</li> <li>▪ Pine Beetle: "We request that this problem be managed by the 'per tree' method with an eye to minimal disturbance ..."</li> <li>▪ C5 Harvest: the Allison FLUZ, the proposed FLUZ expansion, and trails extending beyond FLUZ " should all be removed completely from the harvest plan."</li> <li>▪ Planning: North Tecumseh Road Landowners Group want to be involved in any future discussions affecting logging and MPB control in this area. "CP Cross County Ski Assoc. requests full consultation on all activity and a selective cut method be implemented with an eye to minimal negative effect on our trails and have a comprehensive plan to mitigate any negative consequences."</li> </ul> <p>Clear cutting around the Chinook Lake PRA will "definitely diminish the aesthetic value of the area" and thus will have an impact on commercial tourism operators who use the</p>		<p>various concerns that have been raised by <b>North Tecumseh Road Landowners Group and Crowsnest Pass Cross Country Ski Association. These are provided below:</b></p> <p><b>Forest Management #1.</b></p> <ol style="list-style-type: none"> <li>1. For harvesting in the existing Allison Chinook Forest Land Use Zone and any expansions of that zone, an integrated management approach is to be used to ensure that current and future recreational facilities and opportunities are maintained with timber harvesting activities. This management strategies will be implemented with the following provisions that harvesting: <ul style="list-style-type: none"> <li>does not negatively impact the existing cross-country ski trail system;</li> <li>allows for future expansion of the existing cross-country trail system and the existing Allison-Chinook Forest Land Use Zone;</li> <li>allows for the establishment of a continuous uneven-aged forest over time for the maintenance of landscape and stand level biodiversity;</li> <li>includes the completion of FireSmart partial cut removals along the south boundary powerline;</li> <li>considers reforestation of multiple species, including deciduous, to address long-term FireSmart planning and biodiversity objectives;</li> <li>allows for the removal of individual trees or clumps of trees to address natural disturbance events, such as wildfire and insect and disease, that will minimize impacts on recreational trails and especially cross-country ski trails. Mutual agreement between the Crowsnest Pass Cross-Country Ski Association and Sustainable Resource Development would be required to implement operational plans;</li> <li>requires the use of low impact harvest methods to address the sensitivity of these recreation trails to capture and maintain snow cover during the period when trails are designated for cross-country skiing by signs or notices posted in the FLUZ. All logging equipment and</li> </ul> </li> </ol>	

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	area (i.e., Rocky Mountain Camping). Operators favor alternative measures such as selective cutting. Cutting should not detrimentally affect biking, hiking and ski trails in the area. NOTE – The <b>Crowsnest Pass Cross Country Ski Association</b> submitted a proposal (Sept. 2002) requesting an extension of the existing FLUZ (to include: Sec 28, SW ¼, and Sec 29 SE and SW ¼, and LSD 10 and 11 in Sec 29, TWP 8, R 5, W of 5)		<p>methods must ensure that the goal of low impact harvesting is achieved.</p> <p>recognizes the unique tree species of the Allison Creek drainage, namely a core population for western red cedar (<i>Thuja plicata</i>), as it occurs along the flanks of Tecumseh Mountain (between the cross-country ski trail network, Allison Creek above the dam and Deadman Pass); and</p> <p>ensures that log haul, debris cleanup and disposal occur progressively and outside of the winter skiing season, which is identified as Dec 1 to May 15 of each year.</p> <p>The FLUZ expansion request is being evaluated by ASRD.</p>	
2.	Doubt was expressed that the draft plan 'adequately protects alternate uses of the landscape including: tourism, film making and recreational uses.' For these sectors, landscape appearance is very important. Ranchers along the Livingston Range are considering diversifying operations to include dude ranching and tourism activity. More of this activity will occur in the future so aesthetics are very important along Livingston Range.		<ul style="list-style-type: none"> <li>Livingston Range (upper mountain ridges) is visible from Hwy 22, and entirely from N Burmis Road.</li> <li>visual modeling of proposed timber harvesting cutblocks along Livingston Range (eastern exposure) should be completed to ensure aesthetics are considered <b>when traveling on the North Burmis Road</b></li> <li>See C5 FMP Visual Resource Inventory map</li> </ul> <p>New Forest Management Activity for Objective 30: ASRD will complete a visual assessment of the Livingstone Range as seen from viewscapes along the North Burmis Road.</p>	
3.	Areas like Star Creek – that have beautiful forests – should be left intact.	Obj. 30	<ul style="list-style-type: none"> <li>Landscape aesthetics are a high priority for the Crowsnest Pass and areas visible from Hwy 3</li> <li>Harvest plans in the Crowsnest Corridor must address landscape</li> </ul>	•

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	<p>No clear cutting should be allowed in Star Creek.</p> <p>Star Creek is an important watershed. We have lost too many of these already.</p>		<p>aesthetics if proposed cut blocks are visible from Hwy 3 or local communities</p> <ul style="list-style-type: none"> <li>ASRD is committed to placing portions of Star Creek into a shelterwood cutting regime; details need to be worked out with involved companies; Shelterwood cutting will favor elk and other values.</li> <li>Star Creek will be managed in a shelterwood/partial cut regime to ensure other values (relating to the close proximity of the drainage to the local community and historical uses that include but are not limited to hiking, mushroom picking, intrinsic, spiritual, aesthetics etc) are recognized and elk habitat is favoured. Portions of Star Creek identified in the FireSmart conceptual plan will be harvested to allow for 3 meter crown spacing or small patch removals that will achieve the FireSmart objective of reducing fire behaviour potential (i.e crown fires).</li> <li>NOTE: Quota Holders indicated that they are opposed to this proposal</li> </ul>	
4.	<p>The amount of passive landbase is very disturbing and not entering these areas and making a disturbance footprint ignores natural processes.</p>		<ul style="list-style-type: none"> <li>The 'passive' landbase includes those areas that are not suitable for commercial timber harvesting or for which prior commitments exist (e.g. protected areas)</li> <li>The C5 FMP does not have the mandate to make land use decisions with regard to the 'passive' land base (ACD is land manager for a sizeable portion of the passive land base)</li> <li>IRPs, Alberta's future Provincial Land Use Strategy, and Regional Strategies will determine what are the allowable (priority) land uses in the Eastern Slopes</li> </ul>	

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			<ul style="list-style-type: none"> <li>ASRD will enter into discussions with ACD and Forest Protection Division staff on how disturbances on the "passive" land base will be managed</li> </ul>	
5.	It is alarming that nowhere in the plan's "Resource Management Framework" (Section 3.0 pp. 25 - 27) is any mention made of Alberta's Environmental Protection and Enhancement Act.		<ul style="list-style-type: none"> <li>No attempt has been made in the FMP to reference all applicable statutes and regulations that apply to the C5 FMU.</li> </ul>	
6.	<p>A recommendation of the Special Places 2000 program that lay behind the Castle Special Management Area designation and the revised/updated Integrated Resource Plan issued in 2001, specifically refers to upcoming legislative measures to provide better levels of protection for various areas.</p> <p>The C5 FMP incorrectly states "no new protected areas are contemplated for the C5 FMU in the foreseeable future" (pg 126). This pronouncement contradicts established government policy. In the Special Places 2000 program, the Castle Special Management Area designation and the Draft Updated Integrated Resource Plan for the Castle issued in 2001, recommendations specifically refer to the need for legislative measures for new designations to offer protection for various areas affected by the C5 FMP.</p> <p>The rejection of the contemplation of future protected areas seems to represent what amounts to a fiat coming out of the C5 process overriding existing policy and legislation. Thus</p>	Obj. 6 RMS 11	<ul style="list-style-type: none"> <li>The mandate of the FMP is not to establish new protected areas but ensure biodiversity protection</li> <li>New consolidated provincial protected areas legislation (which was intended to replace the once proposed Natural Heritage Act) has not emerged nor is it likely to emerge in the foreseeable future.</li> <li>The 2001 revised, not yet approved (i.e., having no official status) Castle River IRP states the following: <i>"Participating government agencies believe that policy direction contained in the 1985 IRP is, for the most part, still relevant and applicable. However, a comprehensive evaluation of all policy statements in this IRP should occur after new protected areas legislation has been adopted by the Government of Alberta in the future. New legislated designations that may be applied to the Castle Special Management Area (SMA), or to specific geographic areas within the SMA, will determine how these new protected areas should be managed. For this reason, a thorough review and analysis of this plan should be deferred until new legislated designations have been applied to the Castle River area."</i> (page 2)</li> </ul>	

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	<p>the C5 FMP ignores clear existing policy and legislation.</p> <p>"The Living Document" that lead to the Castle Special Management Area IRP states that the CSMA and/or the Zone 1 and Zone 2 lands in the planning area should be legislated to provide the Castle ecosystem with a higher level of protection than currently exists. Existing options for legislating the CSMA were seen to be unsatisfactory by the Local Committee when it presented its recommendations to the Minister of the Environment in 1997. New designation alternatives, to be identified in new protected areas legislation, could be Applied to the CSMA in the future" (pp.27/28. Revised Castle River Sub-Regional IRP 2001). The failure of the C5 FMP to factor this existing policy into consultation unfairly limits the spectrum of choices offered to the public to a narrow band of options that compliments a timber harvest bias in the C5 FMP area.</p> <p>With regard to Objective 27, Forest Management Activity (fma) #3, (p.120) and Objective 35, fma #3 (p. 142) the CCWC has already demonstrated that these statements misrepresent the Special Places program's recommendations. Nor are these recommendations mentioned in the section dealing with the IRP in the Landscape Assessment section (pp. 8- 9, Appendix 4).</p>		<p>COMMENTARY: The above statement does not imply that new protected areas will to be created, rather it suggests that existing protected areas be reassessed against new legislation, which may require the re-classification of existing protected areas to conform with any new 'classes' established through the Act. New protected areas legislation has not yet been adopted by the province.</p> <p><i>"Recommendations in 'A Living Document' state that the Castle Special Management Area (SMA) and/or Zone 1 and 2 lands in the planning area should be legislated to provide the Castle ecosystem with a higher level of protection than currently exists. Existing options for legislating the SMA were seen to be unsatisfactory by the Local Committee when the committee presented its recommendations to the Minister of Alberta Environmental Protection in 1997. New designation alternatives, to be identified in new protected areas legislation, could however be applied to the Castle SMA in the future." (page 27-28)</i></p> <p>COMMENTARY – The view has generally been taken that with the conclusion of the Special Places program the Government of Alberta would <u>not</u> be actively seeking to establish new protected areas (as existing 'gaps' in the protected areas 'system' were supposedly filled through the "Special Places" program). This is not to say that new protected areas could not be established in the future within the C5 FMU.</p> <ul style="list-style-type: none"> <li>IRPs, Alberta's future Provincial Land Use Strategy, and Regional Strategies will determine what are the allowable (priority) land uses in the Eastern Slopes and whether further protective designations should be applied</li> </ul>	

**Activity #3 (Objective 27) will be modified as follows:**

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			<p>"The provincial Special Places program has been concluded. <b>Now that 'gaps' in the protected areas system along the Eastern Slopes have been filled</b>, no new protected areas are contemplated for the C5 FMU in the future <b>as part of the Special Places program.</b>"</p> <p><b>Activity #11 (Objective 6) identifies wildlife areas where timber harvesting shall be managed to provide hiding cover for wildlife and facilitate wildlife movement.</b></p>	
7.	There needs to be considerably more emphasis on the threat of access roads to ecosystems. Current disturbance levels are clearly too high (as has been highlighted in the draft Grizzly Bear Recovery Plan). This issue has not been addressed in this plan. We should be aiming at maximum road density targets for access within the C5 Management area.		<ul style="list-style-type: none"> <li>• Agreed</li> <li>• It is expected that future access development plans and access management plans will address this concern</li> </ul> <p><b>FMP will provide direction on establishing road density levels for LMUs or other management units in the future. This direction is found in Objective 3 of the FMP.</b></p> <ol style="list-style-type: none"> <li>1. <b>Using a GIS, map the location of all existing roads and trails within the C5 FMU.</b></li> <li>2. <b>For each chosen management unit, calculate current (existing) road densities for each of the following:</b>  industrial roads – open  industrial roads – closed  industrial roads – temporary  recreational motorized access trails – highway vehicles  recreational motorized access trails – OHVs  other linear disturbances (seismic lines, reclaimed roads, etc.).</li> <li>3. <b>Identify the need for and location of proposed new forestry roads within chosen management units (i.e., watersheds, C5</b></li> </ol>	

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			<p>subregions, LMUs, or priority areas) as part of ASRD's access development plan initiative.</p> <p>4. Encourage the involvement of other industries and user groups in the development of the access development plan (which will be used in land management referral processes), resulting in the preparation of a comprehensive and coordinated access strategy for each landscape management unit.</p> <p>5. Establish road density targets for individual landscape management units based on industry needs (existing and future), motorized recreational objectives, and wildlife management needs/objectives (e.g., Grizzly Bear recovery plan).</p> <p>6. Access management strategies (recreational and/or industrial) are to be consistent with road density targets and direction provided in the access development plan.</p> <p>Consider the use of legislative/regulative instruments to restrict public use of industry roads in the FMU. (Road Density proposals were reviewed by CrowPAC and Quota Holders)</p>	
8.	<p>Concern expressed that logging companies are not aware of single and twin track trails in area that need to be left open for recreation user groups. Many existing trails now allow for the ability to provide safe access to recreation users in case of emergency -- allow riders to get back to camp safely, if an accident causing injury occurs</p> <p>Concerned that single truck and twin truck recreation trails will be destroyed and lost. Path to connect existing trails not provided after the fact.</p>		<ul style="list-style-type: none"> <li>• The presence of lesser know trails can be communicated to Quota Holders during public consultation events</li> <li>• Logging companies will be required to track the location of recreation trails when developing AOPs</li> <li>• An access development plan will be completed once the FMP is implemented; it will identify existing recreation trails and proposed harvesting access roads so that conflicts can be minimized</li> <li>• Access management plan will identify which recreation trail are to be left open and closes, and which trails are seasonal</li> </ul>	

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			The FMP will direct that a road and trail inventory be completed in the future and that "open road" densities be established for landscape management units. (Road Density proposals were reviewed by CrowPAC and Quota Holders)	
9.	<p>The plan does not address what happens after MPB hits the pine forest. Will you then replant to pine or choose an alternate species?</p> <p>I truly believe that in 5 - 10 years time the whole C5 FMP will be meaningless as MPB will have hit here and all plans will be shelved. Having said that how do you plan around what to do now as you wait for MPB?</p>	4.4.1 Scenario # 3 & 4	<ul style="list-style-type: none"> <li>ASRD has developed a provincial MPB Policy Framework which outlines Alberta's strategy for addressing a MPB infestation.</li> <li>Alberta would like to minimize the likelihood of MPB gaining a foothold in the FMU</li> <li>C5 FMP conforms with AB's MPB strategy with one exception; the FMP will not attain the following strategy: <i>"Pine Strategy – this is a prevention strategy focusing on the modification of forest structure to reduce the susceptibility to MPB infestation. There are two levels of action considered: i) Re-sequence – evaluate the effectiveness of adjusting existing harvesting sequence to focus harvesting on special beetle management areas. The aim is reduce the area of highly susceptible stands . . . by at least 50% in the next five years."</i> [MPB Emergency Response Plan for Alberta, Sept. 05]</li> </ul> <p>Note: Although this strategy is not fully met, the focus of the plan is the removing of mature pine in advance of mountain pine beetle (MPB). Those stands harvested will not be attacked and regeneration in these harvested areas will mature, contributing to seral stage targets sooner than if allowed to die and reforest naturally after a MPB epidemic.</p>	
10.	Public concerns were raised about ASRD's lack of interest in the Canadian Standards certification process, or in the Forest Stewardship Certification criteria.		<ul style="list-style-type: none"> <li>The draft plan is patterned on CSA's SFM Z809 standard to facilitate future certification</li> <li>The draft plan was prepared in accordance with ASRD's Alberta</li> </ul>	

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	<p>It is regrettable that ASRD has chosen to disregard Canada's national requirements and guidelines for sustainable forest management. Although the layout of the C5 Plan might have one believe that Alberta supports the Canadian Standards (e.g. as referenced, page 36, Section 3.4 "Achieving a desired future forest"), the reality is stated clearly on page 11: <i>"At the time of the plan approval and implementation, ASRD was not prepared to proceed with formal certification of the C5 FMU in accordance with the CSA SFM Z809 or other sustainable forest management certification standard"</i>. By not endorsing the CSA SFM, ASRD is committing our "desired future forest" to a business as usual approach for the next 20 years that will likely be disadvantageous for both the ecosystem and the forest industry itself.</p> <p>That is made clearly evident in the discussion of the "National Context" of page 13, (Section 1.3.3). While we in Alberta do our own thing via AFPA's Code of Practice (Forest Care), the rest of the country is requiring third party certification for one of three internationally recognized sustainable forest management standards. Is this just a reflection of the marginal importance of commercial forestry in the C5 FMU to Alberta's economy, confirming a point already made by the CCWC and CPAWS? The above discussion is not just some "philosophical objection". The implications of taking this approach are seen as soon as you compare the Criteria and Objectives for the C5 process with</p>		<p>Forest Management Standard (2005) which states the following: <i>"Alberta has adopted the CAN/CSA-Z809-2002 Sustainable Forest Management: Requirements and Guidance Document (referred to as CSA Z809) as the forest management planning system. All standards in CSA Z809 apply to forest management planning in Alberta except where specifically excluded in the Alberta standard. Certification is recommended but not mandatory in Alberta, and CSA Z809-02 is designed to enable certification by third party auditors. . . . Although the standard is based on CSA Z809-02, neither this nor any other certification method is specifically endorsed by Alberta. [Preamble]"</i></p> <ul style="list-style-type: none"> <li>• Forest certification, while desirable, is not ASRD's highest priority at this time</li> <li>• Budgets for achieving various certification requirements are not yet in place</li> <li>• Certification of a defined forest would entail support by non-forestry industries, which still needs to be secured</li> <li>• One quota holder, Spray Lakes Sawmills (SLS), has been subject to independent audits and was certified under the Alberta Forest Products Association "Codes of Practice - Forestry Care" standard in 1996, 1999, 2002 and most recently in October 2005 (certification is good for a 3 year period)</li> <li>• Quota Holders are free to pursue certification for their respective quota spheres (<b>given the FMP's alignment with much of CSA SFM Z809-02, the FMP would be supportive of future certification</b>)</li> <li>• Recommendations in the FMP demonstrate that ASRD is not pursuing a 'business as usual' approach; the plan recommends a departure from the status quo in numerous areas (for example,</li> </ul>	

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	those of the original CSA SFM documents.		see Section 4.4.1 in the FMP) - recognition of the value of random camping locations - new requirements for reforestation to the species that have been harvested. - monitoring and stewardship reporting - production of a spatial harvest sequence. - recognition of a different establishment time for Douglas fir - recognition of the unique nature of Douglas fir "A" and "B" stands - establishment of old growth minimums for the active landbase - 30 year green up - deferral of harvesting in some headwater basins for 20 years to allow watershed recover and for aesthetics.	
11.	<p>We go from high level sustainable forest principles to a focus on solely the timber management and supply allocation parameters, so that the "ecosystem diversity" Element (1.2 on p. 47) states, "conserve ecosystem diversity at the landscape level by maintaining the variety of communities and ecosystems that naturally occur in the defined forest area" is transposed on page 48 to the C5 FMP #1, Matrix #1.1.1 Objective "to maintain the full range of cover groups and seral stages". Thus ASRD jumps from laudable and credible principles of the CSA SFM to the harvesting and management of trees (pp. 49 - 51), comfortably avoiding any discussion of the "desired future forest".</p> <p>Rather than delay with questions raised about how the conservation of biodiversity will be achieved at different</p>	Sec. 3.5	<ul style="list-style-type: none"> <li>• Seral stage targets have been proposed to retain a diversity of forest cover types over time</li> <li>• The main influence of the C5 FMP is our ability to manipulate forest cover, so monitoring of vegetation types is key in any forest management regime</li> <li>• No evidence suggests that species have been lost in Alberta during the last 50 years because of logging</li> </ul>	

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	scales, the Planning Team's response (? in its MATRIX response document) is an assertion: "It is ASRD's view that FMP targets and strategies for achieving biodiversity will offer an adequate level of protection at different scales...No change required".			
12.	Given the acknowledged vulnerability of the ecological integrity of Waterton Lakes National Park, and the critical importance of the adjacent lands for maintaining the park's integrity, ASRD's responsibilities for supporting Waterton Lakes NP should go far beyond the forest management activities referenced on pp. 72 - 73, items 2 through 5. Fish and Wildlife staff should be fully engaged in any such reciprocal processes and not be subordinated to PLFD dictates. Criterion 2 (C5 Objectives 14 - 20)		<ul style="list-style-type: none"> <li>• No timber harvesting is anticipated immediately along the shared boundary with WLNP</li> <li>• It is the intention of ASRD to meet with WLNP and ACD staff during plan implementation to ensure that activities along shared borders are complementary and achieve mutual objectives. Discussions on how forest health issues may affect the 'active' land base within the C5 FMU will occur.</li> <li>• WLNP, ACD and ASRD all participate on the multi-stakeholder Crown of the Continent initiative</li> </ul>	
13.	The input of Quota Holders seems to have been given preferential consideration during the development of the MATRIX and the draft plan. Quota holder comments have had the effect of weakening the wording of the last draft in many, but not all, cases to accommodate their interests and to the detriment of the conservation and ecosystem values associated with the active forest land base (and likely the passive land base too). Again, this has had the effect of shifting the C5 FMP away from the CSA SFM standard for addressing Forest Ecosystem Resilience (Element 2.1 p. 80).		<ul style="list-style-type: none"> <li>• The Planning Team has compiled and reviewed feedback received during the "Matrix" and "draft FMP" development stages. All (public, stakeholder) input has been duly considered. Decisions and actions taken in response to the input received was based on: the merits of the proposals themselves, their congruence with provincial policy and legislation, the feasibility/implications of adopting proposals, resourcing requirements, observance of environmental safeguards, etc.</li> <li>• CrowPAC and Quota Holders offered numerous suggestions during the Matrix development stage. Many of these were accepted.</li> </ul>	

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14.	With respect to Objective 18 (regarding weeds), the CCWC is particularly concerned that in the interests of controlling restricted and noxious weeds, that ASRD does not (through its seed mixes) add to the current proliferation of non-native species that is occurring on and around cutblocks and roadways. CCWC members have been active over the years in addressing this concern.	Obj. 18	<ul style="list-style-type: none"> <li>The FMP explicitly addresses these concerns in Actions 1-8 of Objective 18</li> </ul>	
15.	Quota Holders appear to decry the reasonable costs of doing business, and in the case of Department of Fisheries and Oceans (DFO) requirements, consistently challenged any obligations on their part to consult with DFO, citing exemptions, and has pushed back against proposed penalties for infractions. Rather than hold the line in requiring operators to consult, the C5 Plan has backed off into waffle words: "operators are encouraged to", "it is advised that".	Crit. 3 Obj. 21-24	<ul style="list-style-type: none"> <li>DFO has expressed a comfort with direction contained in this part of the FMP</li> <li>The FMP outlines minimum standards and requirements that must be met to achieve an established level of environmental quality. Quota Holders are free to exceed these standards (and are encouraged to do so whenever opportunities arise to do so)</li> <li><b>While there is no legal requirement to contact DFO, logging companies do – in good faith – contact DFO.</b></li> </ul>	
16.	Quota Holders have claimed exemption from the Watercourse Crossing Code as not applying to the forest industry in the Green Area, and it is not a regulatory requirement to consult with DFO. This sounds like "watershed protection", the highest priority in the IRP, is getting washed away here. Given the government's past poor performance regarding baseline data for watersheds, fish habitat and such things as in-stream flow needs for species at risk, it cannot be assumed that a "no net loss" approach to fisheries is in any way adequate to protect fish habitats. In the absence of adequate information, it is to be		<ul style="list-style-type: none"> <li>The C5 FMP project is not the place for <b>reviewing or</b> re-writing the provincial <i>Watercourse Crossing Code of Practice</i> to require future compliance by timber operators</li> <li><b>The Code of Practice only applies to multi-span bridges; other guidelines are in place for single-span bridges</b></li> <li>Quota Holders are encouraged to follow best practices</li> <li>ECA Alberta and WRENS-AB are the tools being used by ASRD to test whether proposed logging activities will create unacceptable hydrological impacts to watersheds and to stream flows.</li> </ul>	

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	assumed that the C5FMP will have strong reliance on "precautionary principles" to address watershed issues - rather weak tools in light of quota holders attitudes expressed in the earlier feedback. This in turn will require major investments in monitoring and enforcement - something that has not been characteristic of the department's role in the past.			
17.	A "fire factor" to account for losses due to natural disturbance should be calculated in the AAC. I support large, aggregated blocks, but only with reasonable levels of stand retention, i.e., much greater than 3%.		<ul style="list-style-type: none"> <li>Provincial policy exists to deal with fire losses, when and if they happen. These policies do not penalize a company with an AAC loss (up front) as a result of fire.</li> </ul>	
18.	Residual structure targets of 0 - 5% (average 3%) are too low and not based on science. A government document - the ecological basis for stand management - recommends up to 30%. A 15% residual (range 5 - 25%) will maintain stand level attributes.		<ul style="list-style-type: none"> <li>Regrettably the referenced document is not mentioned by name to allow for follow-up</li> <li>0-5% structure retention falls within the range of other approved FMPs in Alberta</li> <li>3% has been identified as a reasonable target (following natural disturbance regimes) in Foothills Model Forest Fact Sheets.</li> </ul>	
19.	Clearcutting is also a key issue in the lack of acceptance for forestry activity in the FMU.		<ul style="list-style-type: none"> <li>Clearcutting is a tree species dependent silvicultural practice; the silvics of pine species requires disturbance emulated by clear cutting (large forest openings in which sufficient light and heat exist to allow for pine regeneration)</li> <li>Clearcutting is seen to be a legitimate forest management activity as it mimics large disturbance events in nature</li> <li>The recognition and establishment of several wildlife movement corridors in the C5 FMU increases the need to use alternative silvicultural systems (including modified clear cutting) to achieve</li> </ul>	

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			site/habitat objectives	
20.	Need to see 'old forest' objectives (they were not included in the draft plan) before I can comment on the plan. Maintaining an appropriate old forest (for example, with 25% of the mean of NRV) may impact AAC. Old forest should be calculated <u>first</u> as an input, not after the fact, as cut may have to be reduced to maintain these values.		<ul style="list-style-type: none"> <li>• According to the spatial harvest sequence (SHS), old growth will be a significant component of the net land base in the future. See Appendix 6A, section 4.8.8.</li> <li>• Old growth seral stage targets have been established; targets will meet biodiversity objectives and satisfy economic and social objectives</li> </ul>	
21.	Exclude the South Castle area from the timber supply - the biodiversity values here are just too high for the area to be logged and 'roaded'.		<ul style="list-style-type: none"> <li>• Biodiversity exists when a range of seral stages are present on the land base, including early successional stages that are brought about through logging or natural disturbance. Since fire suppression efforts have been successful in reducing fire disturbance area, logging is a managed alternative.</li> <li>• Logging (if sensibly done) is not incompatible with biodiversity; timber harvesting mimics natural disturbance events in an ecosystem</li> </ul>	
22.	Concerned about water quality and hydrological impacts – flooding.		<ul style="list-style-type: none"> <li>• The ECA Alberta and WRENSS–AB models will help ASRD staff determine what impacts logging will have on a watershed.</li> </ul>	
23.	Selective logging can be a method to harvest in a more sustainable way.		<ul style="list-style-type: none"> <li>• Selective cutting throughout the C5 FMU would likely result in a doubling of roads (the social and environmental impacts of this is seen to be unacceptable)</li> <li>• Shelterwood harvesting will be used in several locations where it is deemed necessary and effective</li> </ul>	
24.	The regeneration time for clearcuts is too long!		<ul style="list-style-type: none"> <li>• The C5 FMP requires Quota Holder conformity to Alberta's</li> </ul>	

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			<ul style="list-style-type: none"> <li>regeneration standards</li> <li>• Regeneration time is tracked through the 'Growth and Yield' program and the ARIS tracking system.</li> <li>• The C5 FMP allows for 5-year seedling establishment period for pine, spruce and alpine fir, and 10 years for Douglas fir, and a 30 year green up period.</li> <li>• Sow forest growth is reflected in the Yield Curves which is factored into the AAC calculation.</li> </ul>	
25.	The FMP indicates that new research findings or recommendations will be incorporated. How about using the latest research available on invasive weeds, bear and wolf habitats, fire smart plans and protection of old growth, to name a few?	Obj. 49, 50	<ul style="list-style-type: none"> <li>• ASRD is committed to improvements and will adopt new practices and be responsive to new research findings</li> <li>• Southern Rockies Watershed study is a major initiative being undertaken in the FMU by the U of A (supported and partially funded by ASRD)</li> <li>• Shelterwood trials will be undertaken in the future to increase our understanding of this silvicultural practice in the FMU.</li> </ul>	
26.	If you are serious about provincial carbon protocols, how could you ignore the alarming amount of pollution produced by ORVs with their 2-stroke engines? Instead you choose to promote these noisy, highly polluting machines. Where is the balance here?		<ul style="list-style-type: none"> <li>• C5 FMP will conform with provincial direction once established</li> <li>• ASRD does not officially promote specific engine types for OHVs</li> </ul>	
27.	The suggestions in Objective 27 to "increase the net forest land base", in Objective 41, target a), p.155 to "increase the amount of feedstock for intermediate and final forest product operations" and in Objective 42, target b) to "increase the volume of premium logs/wood into the value chain" are unreasonable and probably unachievable. Given the high	Obj. 27	<ul style="list-style-type: none"> <li>• The reforestation of old mine sites, well sites that have been reclaimed with grasses, and seismic lines are all means by which the net forest land base can be increased</li> <li>• Changing societal values, a growing population in southern Alberta, increasing public use of the C5 FMU, and the role of</li> </ul>	

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	<p>non-commercial values characterizing the Castle Special Management Area identified in the 1986 IRP and clearly prioritized in the 2001 Updated Revision, ASRD, in conjunction with the commercial timber quota holders, should provide the public with a full lifecycle cost-benefit accounting of present forestry activities in the C5 FMU. Without such an accounting the benefits of any commercial logging in the Castle portion of the FMU are merely speculative, or just a "philosophical preference" on the part of ASRD.</p> <p>While there is a publicly perceived, and departmentally <i>assumed</i> economic virtue associated with the harvest of timber in the C5 area, I'm sure that no economic study has determined that timber harvest in this region is, in fact, economically viable. Further, while I don't question the economic viability of timber harvest on many forested landscapes, the land base here - high, dry and cold - presents incredible costs and only a marginal return. Our matchstick forests (except for those occupying valley floors) are little more than pole producers. They're unproductive and the cost of managing them likely exceeds (when we look at the forest as a whole, and <i>all</i> the real and honest costs) the value of the resultant harvestable timber.</p> <p>If we assume the role of economist and look at this picture, especially as it's projected to play out over the next twenty years, we must look at, and include, the cost of both fire suppression and wildfire containment. Additionally, we must</p>		<p>timber harvesting in a forest that is increasingly valued for its recreational benefits make the completion of a cost-benefit analysis of differing land uses in the C5 FMU a future possibility</p>	

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	look at the fact that society has paid many millions of dollars to "achieve" the current fire danger and the current threat from insect infestation. And then, we must look at the fact that, now that we've achieved these threats (they're already bought and paid for), we are being asked to pay many millions more to alleviate them. In a nutshell, we're being asked to throw an awful lot of money toward a problem that has never been comprehensively defined, a problem that can only be expected to grow ever more acute during the next twenty years, a problem that will almost certainly demand increasingly disproportionate energy costs in the future.			
28.	Don't support any clear cuts in the Crowsnest Valley. The economic value of a pristine viewscape is paramount to our development on Crowsnest Lake		<ul style="list-style-type: none"> <li>ASRD has completed a visual assessment (i.e., Visual Resource Inventory) of the Crowsnest Pass and has identified visual quality objectives.</li> <li>Harvest blocks that would have been situated in the 'mid ground' (when viewed from the proposed Crowsnest Lake development) have now been deleted in the preferred forest management scenario</li> <li>Landscape aesthetics must be addressed in all harvest designs for the Crowsnest Pass. ASRD staff are prepared to discuss harvesting patterns and forestry aesthetics with the public.</li> <li>Wildlife travel corridors (1.6 km in width) will be retained along the edges of the Forest Reserve in the Crowsnest Pass. These areas will allow timber harvesting with due consideration for wildlife travel (north-south). This could be accomplished with partial cutting, clearcutting with strategically placed stand retention, and</li> </ul>	

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			<ul style="list-style-type: none"> <li>a commitment to access controls.</li> <li>The requirement of leaving stand structure will contribute to the establishment of a pleasing and harmonious harvest pattern</li> </ul>	
29.	SRD is using the pine beetle/fire card for job security.		<ul style="list-style-type: none"> <li>ASRD has taken the view that MPB is a real and imminent threat. Prudence demands that appropriate action be taken to protect the forest. Harvesting of stands that have a very high probability of being infected will occur to minimize economic losses.</li> <li>Should a MPB epidemic materialize, the cut level will rise considerably from what is proposed now.</li> <li>The pine focus harvest of the preferred forest management scenario contributes to the Quota allocation.</li> </ul>	
30.	Keep the cows out of the high country. Tired of finding cow-pies in every creek bed!		<ul style="list-style-type: none"> <li>The Castle River and Livingstone-Porcupine Hills IRPs recognize livestock grazing is an acceptable ('managed' and restricted') activity within the Forest Reserve. Riparian management is a high priority to the Department of Sustainable Resource Development. Although this issue is beyond the scope of the c5 FMP the department is working through other initiatives and strategies such as the Cows and Fish Program, Stewardship, Education and awareness and monitoring to ensure that riparian areas are properly managed and management issues are identified.</li> </ul>	
31.	The FMP puts forward the objective of minimizing motorized access. We hope this means keeping vehicles out of high areas, preferably above 1500m, except as needed for timber harvesting and other allowed resource development. Quads and pickups are used irresponsibly and do much damage.	Obj. 3, 32	<ul style="list-style-type: none"> <li>The C5 FMP promotes 'managed' access.</li> <li>Details are what kind, where, when and how much recreational access is to occur is best addressed in access management plans</li> </ul>	

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32.	<p>Objective 27 - have concern that harvest is at its maximum rate now and to increase the take would lead to unnatural processes such as regenerating with only fast maturing species such as "pine". A "tree farm" is not what we need in the C5.</p> <p>The fact that the C5 FMP is proposing a 25% increase in an already considerable AAC makes the likelihood of future timber harvesting being "sustainable", in any meaningful sense of the word, extremely unlikely. There seems to be no scientific justification for a twenty-year "surge cut". How will this AAC react to possible changes as a result of future climate change?</p>	Obj. 27	<ul style="list-style-type: none"> <li>• The proposed AAC (initially set at 125% - now reduced to 120% of the 2005 harvest level) has been set far below the sustained yield AAC that could in fact be adopted in the C5 forest. from a strictly wood production perspective (i.e., if non-timber values are ignored), the forest is capable of a much higher annual harvest than has been identified in the FMP.</li> <li>• The maintenance of natural processes is an important consideration. The C5 FMP promotes silvicultural practices that maintain natural processes</li> <li>• Reforestation to previously existing species is a new requirement of the C5 FMP</li> </ul>	
33.	The proliferation of roads / ATV use / ATV rogue trails / random camping are issues almost greater than logging, that need to be managed and addressed now. Does this plan support this?	Obj. 32 FMA 4	<ul style="list-style-type: none"> <li>• The FMP touches on access management in only an oblique manner. Motorized access issues will be addressed in a future access development plan and through recreational access management plans.</li> <li>• It is anticipated that direction contained in the provincial Grizzly Bear Recovery Plan will have implications for how access is managed in the C5 FMU.</li> </ul>	
34.	ASRD enforcement of "best practices" for timber harvesting is more than likely "political" in nature.		<ul style="list-style-type: none"> <li>• Staff field inspections, independent audits, and company self-reporting are being used to ensure conformance with standards and guidelines.</li> </ul>	
35.	I would hope that the few areas that have been identified for partial cutting are the only areas to be partially cut.		<ul style="list-style-type: none"> <li>• Partial cutting will be selectively applied (e.g., Star Creek) in the FMU to achieve specific silvicultural, landscape or habitat objectives.</li> </ul>	

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			<ul style="list-style-type: none"> <li>Partial cutting is used in a limited way at this time given the increased costs associated with this harvest strategy and recognizing the silviculture requirements of the species; e.g., pine is shade intolerant and therefore partial cutting in pine can create silvicultural challenges.</li> <li>Negative public reaction against clear cutting may result in the greater use of alternative silvicultural prescriptions</li> </ul>	
36.	Why do woody debris levels in a cutblock have to correspond with adjacent stands? What does this actually achieve?	Obj. 4	<ul style="list-style-type: none"> <li>The intent is to compare pre to post-harvest condition, ensuring coarse woody debris is found on all harvest blocks.</li> <li>Leaving comparable levels of woody debris on the ground in cutblocks emulates natural conditions. Woody debris provides an important biological/environmental function.</li> <li>Leaving woody debris, especially in the cleaner mature pine stands, allows for species, seen and unseen, to thrive</li> </ul>	
37.	If industrial salvage affects a quota holder's AAC, the quota holder should have the first opportunity (i.e., first right of refusal) to acquire the salvaged logs.		<ul style="list-style-type: none"> <li>An industrial salvage program that notifies the Quota Holder and other small operators who are interested in salvaged logs is desired in the C5 FMU</li> <li>Disposition holders have rights to the wood and thus are free to decide how they wish to dispose of it. ASRD cannot dictate to whom the wood will go; however, historically if a quota holder holds a licence in the area, the disposition holder is informed of this fact.</li> </ul>	
38.	Will future fire disturbances result in a reduction of the AAC, or would forestry companies simply be allocated replacement logging areas within the C5 area?		<ul style="list-style-type: none"> <li>A significant disturbance event or a reduction of the net land base by 2.5% will trigger a recalculation of the AAC and the initiation of an updated TSA</li> </ul>	

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			<ul style="list-style-type: none"> <li>Forestry companies are encouraged to salvage burned forest stands. When salvage harvesting is completed, they would continue on to the next sequenced compartment as identified in the spatial harvest sequence. Burned stands that are salvaged will be reforested and returned to the land base and placed on a yield trajectory that contributes to the future AAC.</li> </ul>	
39.	The does not reference areas which should be removed from future forestry operations. Numerous provincial initiatives have highlighted the importance of the Castle region for example. This is clearly an area of marginal value to forestry, but with an enormous value for its wilderness, wildlife, water and recreation functions. Similarly, areas of the Porcupine Hills are being increasingly recognized for the importance of their non-timber features. If areas such as this are to be removed from the managed forest land base in the future, then this makes objectives such as <i>maintain or increase the net forest (commercial timber harvesting) land base in the C5 FMU</i> " (objective 27) unachievable.		<ul style="list-style-type: none"> <li>Commercial timber harvesting will not occur in protected areas or elsewhere on the 'passive' land base.</li> <li>The following unique features are recognized within the net land base of the FMU: random camping sites, "A" &amp; "B" density Douglas fir stands without an under-story.</li> <li>It is quite conceivable that there will be land base deletions/withdrawals from the net land base in the future to accommodate new land use objectives and changing social values; however, additions back into the landbase are possible. For example, reforestation of old dispositions, reclaimed mine sites, modifications of the FMU boundary to include White Area lands are all viable possibilities.</li> </ul>	
40.	The plan appears to be very much a "forestry" management plan, as opposed to a "forest" management plan. Although only 34% of the C5 land base is designated for harvesting, this plan will have serious implications for the remaining 66%. The emphasis of the plan continues to be on the provision of a continuing timber supply (" <i>The FMP will focus on managing the C5 forest land base to supply a continuous flow of timber</i> " 1.2 Purpose and Scope of this Plan), rather than the management of a complex forest ecosystem.		<ul style="list-style-type: none"> <li>The implications of timber harvesting on the adjacent 'passive' land base will need to be addressed should issues arise (the opposite is also true)</li> <li>The C5 FMP has a narrow focus – the "active land base" for timber production. Land and resource management responsibilities for the 'passive' land base may be shared or under the control of other provincial departments</li> <li>The C5 FMP is concerned with both forestry and forest</li> </ul>	

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	Although the plan is intended to be a plan for forestry operations, it does also cover the 66% of the area which is the "passive land base", and should be guided by other policies and initiatives which recognize the values other than timber production within the C5 area. If nothing else, from a purely scientific basis, it is important to maintain "control" areas against which the effects of management practices can be measured.		management. Given the plan's focus on the 'active' land base, where commercial timber harvesting can and does occur, it is reasonable to expect that the plan will address timber harvesting in a direct manner	<ul style="list-style-type: none"> <li>Protected areas could serve as 'control' areas</li> </ul>
41.	The conservation community has had a long standing interest in the area covered by the C5 FMU. We believe that current management of Alberta's forests, particularly those along the southeastern slopes, is inadequate to achieve any meaningful targets for biodiversity or maintenance of forest eco-system health. The status quo is not acceptable, and the C5 Forest Management Plan (C5 FMP) needs to allow for some major changes in forestry practices. While the draft C5 FMP is full of some laudable principles, it is difficult to be optimistic that these will result in the substantive on-the-ground changes which are so desperately needed.		<ul style="list-style-type: none"> <li>ASRD is committed to 'sustainable forest management' (SFM). This entails taking biodiversity and forest eco-system health seriously. A new forest planning manual has been developed which identifies new practices and requirements.</li> <li>Staff involved in the development of the C5 FMP recognize that this plan represents a departure from the status quo in numerous areas (new innovations and higher standards are being set to safeguard species, habitats and natural processes.)</li> </ul>	
42.	The value of the C5 Management area for the production of a clean and sustainable water supply is only given passing reference in the C5 FMP. Federal and Provincial initiatives have recognized this value for decades: <i>"It has been said that one of the primary aims of all National Forests is the production, in perpetuity, of a supply of timber. In mountainous regions this use of the forest may, by</i>	Obj. 24	<ul style="list-style-type: none"> <li>The importance of the C5 FMU for water supply cannot be disputed.</li> <li>Water scarcity (i.e., limited water supply) requires that forest management actions and silvicultural activities not detrimentally affect local watersheds. To that end, ECA Alberta and WRENSS-AB are the tools being used by ASRD to test whether proposed logging activities will create unacceptable hydrological impacts to</li> </ul>	

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	<i>necessity, be subservient to another use - that of watershed protection.</i> " Dominion of Canada, Department of the Interior brochure, 1927. " <i>The highest priority is placed on watershed management to ensure a reliable supply of clean water for aquatic habitat and downstream users.</i> " 1979 Policy for Resource Management of the Eastern Slopes. Unfortunately, this plan seems to recognize such values only where they do no conflict with the intention to "to maintain or increase the net forest (commercial timber harvesting) land base."		watersheds, adversely affect water yield, or significantly alter stream flows.	
43.	<p>Why does the draft plan not aim to work within Canada's national requirements and guidelines for sustainable forest management? "At the time of the plan approval and implementation, ASRD was not prepared to proceed with formal certification of the C5 FMU in accordance with the CSA SFM Z809 or other sustainable forest management certification standard". What is the justification for this decision? We expect that the C5 area should not just be managed to achieve minimum standards. Other more ambitious targets, such as the internationally recognized Forest Stewardship Council certification, would be more appropriate for an area with so many non-forestry interests.</p> <p>ASRD should ensure that the current FMP meets all CCFM's Criteria and Indicators Framework and the adoption of CSA SFM Z809 Standard by the time the C5 Plan is endorsed in May 2006. Failing that (as is obvious from the present Draft Plan), these standards should be achieved by 2016. This</p>		<ul style="list-style-type: none"> <li>• The draft plan is patterned on CSA's SFM Z809 standard to facilitate future certification</li> <li>• The draft plan was prepared in accordance with the <i>Alberta Forest Management Standard</i> (2005) which states the following: "Alberta has adopted the CAN/CSA-Z809-2002 Sustainable Forest Management: Requirements and Guidance Document (referred to as CSA Z809) as the forest management planning system. All standards in CSA Z809 apply to forest management planning in Alberta except where specifically excluded in the Alberta standard. Certification is recommended but not mandatory in Alberta, and CSA Z809-02 is designed to enable certification by third party auditors. . . . Although Alberta standard is based on CSA Z809-02, neither this nor any other certification method is specifically endorsed by Alberta". [from Preamble]</li> <li>• Forest certification, while desirable, is not ASRD's highest priority at this time</li> <li>• Budgets for achieving various certification requirements are not yet in place</li> </ul>	

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	has been a missed opportunity for sustainability in the Castle and the C5 FMU as a whole, as has already been recognized by Steven Kennett, Research Associate for the Canadian Institute of Resources Law, in his 2003 paper titled, "Spinning Wheels in the Castle: a lost decade for sustainability in Southwestern Alberta". (CIRL Occasional Paper #14, October 2003).		<ul style="list-style-type: none"> <li>• Certification of a defined forest would entail support by non-forestry industries, which still needs to be secured</li> </ul>	
44.	<p>The Castle area in particular has long been recognized to hold many values, including wildlife, water and recreation, which are considerably more important than its marginal timber value. Even the revised 2001 Castle River IRP states, <i>"The 1985 IRP indicates that watershed, recreation and tourism resource management objectives have the highest priority in the Castle River Area and are subsequently listed first."</i> These values need to be recognized by legislated protection. Within this context, we offer the following concerns:</p> <ul style="list-style-type: none"> <li>• The main option for logging is still clear cutting.</li> <li>• Old growth is not protected.</li> <li>• Off road vehicles are not regulated.</li> </ul>		<ul style="list-style-type: none"> <li>• The rich biodiversity found in the Castle area is recognized</li> <li>• It is recognized that the C5 forest provides a wide range of values beyond timber harvesting</li> <li>• A sizeable land base within, to the south, and to the north of the FMU has been formally protected</li> <li>• Clearcutting (when sensibly done) does not need to conflict with biodiversity values</li> <li>• Old growth stands are protected within protected areas and will be an ongoing (geographically dynamic) component of the C5 FMU land base; i.e., levels of old growth on the net landbase for timber production vary over time but are maintained. See Appendix 6B of the C5 FMP.</li> <li>• Access plans have been identified as an instrument to control OHVs. If a regulatory approach is preferred, FLUZs can be designated for select areas</li> </ul>	
45.	You have omitted any objectives to deal with user conflict, especially between motorized and non-motorized recreation. By refusing to deal with this issue, you are increasing conflict. Also, since this is not a statutory plan, it will depend on voluntary compliance, which has not worked in the past.	Obj. 31, 35	<ul style="list-style-type: none"> <li>• The resolution of land use conflicts between different recreational users falls outside the scope of the C5 FMP</li> </ul>	

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46.	Since this plan is not statutory, the regulations and enforcement that have been so sadly lacking will remain absent. Your action plan lacks the detail to give the public a true picture of your intentions, so if any real changes are planned, it was not obvious in your plan.		<ul style="list-style-type: none"> <li>The C5 FMP does not possess statutory authority. It has long been the tradition of the provincial government to manage public land and natural resources through policy plans rather than planning instruments that have legislative force. Policy plans provide needed direction, yet permit flexibility in decision making. Statutory / regulatory mechanisms are used from time to time to control land uses in defined locations (e.g., protected areas, FLUZs).</li> <li>ASRD field inspections, independent audits and industry self-reporting will be used to ascertain compliance with the FMP's provisions and other relevant guidelines and standards</li> <li>It is our view that the FMP and supporting Appendices provide considerable detail on the government's management intentions for the FMU</li> </ul>	
47.	Forestry's practice of clearcutting and then planting mainly pine trees has brought about the Pine Beetle problem. And now the only solution outline is increasing the AAC and cutting/burning any potential problem areas. This, along with the ill-fated Fire Smart program will only increase the risk of fire, open up more land to invasive weeds and greatly increase the use of ORVs in the area. This will further degrade the ecosystem.  Also, since you are knowingly increasing the fire risk, I would think that it would increase the liability factor as well.		<ul style="list-style-type: none"> <li>The threat of a MPB infestation (from B.C) and the presence of acceptable conditions for MPB outbreak in Alberta can be explained by a number of contributing factors; however, reforested stands are not a contributing factor because MPB requires older stands to thrive.</li> </ul>	
48.	The conservation community would expect better adherence to the front-end design for any offspring of the "CrowPAC"	Obj. 45	<ul style="list-style-type: none"> <li>The "new CrowPAC" will have balanced representation and will operate in accordance with a Terms of Reference.</li> </ul>	

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	proposed in Objective 45, p. 165.		<ul style="list-style-type: none"> <li>Discussions are underway on the need for a public advisory committee in the Crowsnest Pass that would address a number of different matters of interest to ASRD (i.e., the new public advisory committee may be expanded to take on a more diverse mandate).</li> </ul>	
49.	Concern was expressed that extensive industrial activity (and logging) along the Livingston range has (and will) displace wildlife, making adjacent ranches a sanctuary for grizzly bears, elk, moose, sheep, and goats. The forest reserve and logging should be managed to provide a place for wildlife. Logging and road access will likely negatively affect wildlife species. Some areas should remain un-logged to meet environmental and wildlife habitat objectives.		<ul style="list-style-type: none"> <li>Industrial activity that displaces wildlife from the forest reserve onto adjacent lease or private land can create unwanted wildlife problems for land holders.</li> <li>It is thought that the C5 SHS creates a landscape mosaic which ensures a sufficient quantity, quality and variety of wildlife habitats in the Forest Reserve to accommodate all wildlife needs (see table 8 and 9 for Objective #1 which identifies seral stages that will we present)</li> <li>Only 34% of the C5 FMU will be considered for timber harvesting</li> <li>Numerous protected areas exist within and surround the C5 FMU</li> <li>Logging disturbances can provide/improve wildlife habitat if access is controlled and progressively reclaimed</li> </ul>	
50.	Logging access roads should be of a temporary nature and reclaimed immediately following logging activity.		<ul style="list-style-type: none"> <li>C5 FMP directs that a coordinated industrial road access plan be developed in the future to minimize roading</li> <li>Planning Team favors 'temporary' logging roads in specific locations which are then reclaimed. Future access development plan will identify the location of permanent and temporary roads.</li> </ul>	
51.	An area being targeted for logging early in the SHS is the headwaters of Ernst Creek – an undeveloped mountain valley beside the Swinton Ranch and Elkhorn Stock Ranch (an area with limited access and thus a wildlife sanctuary).		<ul style="list-style-type: none"> <li>Logging road access into Ernst Creek will be addressed specifically in a future Annual Operating Plan, which will be made available for public review. Local rancher concerns will be factored into road access decisions that are made (directly</li> </ul>	

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	<p>Logging access into this area (from the N or S) will entail using/creating roads through both ranches (on leased and/or deeded land). New logging access into Ernst Creek from the N from Highway 517 should <b>not</b> be developed to protect this undisturbed landscape, to reduce trespass and poaching. If the headwaters of Ernst Creek are to be logged, it is recommended that existing private access be used, however, this will directly affect the Swinton Ranch whose buildings are along the access road.</p> <p>Ernst Creek is a pristine mountain creek with excellent water quality (no structures cross it). It is the main water source for the Elkhorn and Swinton ranches. How can we be sure that logging will not detrimentally affect this important water source? Logging must meet very high standards.</p>		<p>affected landowners will be consulted beforehand).</p> <ul style="list-style-type: none"> <li>Stream protection is being addressed in Operating Ground Rules and in Final Harvest Plans for a particular area</li> </ul>	
52.	<p>Clear cuts that occurred in the southern Porcupine Hills have not successfully regenerated since the area was logged 20 years ago. This constitutes un-sustainable logging. The respondent is opposed to logging and energy development in the forest reserve.</p>		<ul style="list-style-type: none"> <li>The reforestation of SW and W facing cutblocks to Douglas Fir has presented challenges</li> <li>The FMP is advocating a move toward shelterwood harvesting systems in this area and supports experimentation (see Obj #19, FMA #1), and see Appendix 9B for details on Porcupine Hills harvesting and silvicultural strategies.</li> </ul>	
53.	<p>Numerous respondents favored no (or less) clearcutting and the use of more alternative silvicultural methods. Clearcutting is not environmentally and socially acceptable. Clearcutting is untenable. The C5 FMP's timber harvesting proposals are "far too dramatic" and thus should be either substantially reworked or scrapped.</p>		<ul style="list-style-type: none"> <li>Clearcuts with irregular edges that blend into the landscape and in which stand structure (ranging from 0-5% in each cutblock) has been retained, can emulate natural disturbances (see Obj. #4 and SHS)</li> <li>Clearcutting (i.e., large patch removals) is a legitimate silvicultural practice on the forested landbase in Alberta.</li> <li>Silvicultural practices are dictated by tree species (i.e., pine stands</li> </ul>	

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			<p>regenerate best in large openings) (see Obj. #55, FMA #5)</p> <p>Opinions vary on the term "clearcutting". The following are two examples:  <i>"Clearcutting has the potential to create the greatest degree of ecological change in the harvested ecosystem. This change may be either desirable or undesirable, acceptable or unacceptable, according to the type of forest and the management objectives for the forest."</i>            Hamish Kimmins (1992)</p> <p><i>"Clearcutting" is really a word with many meanings as well as an ugly connotation; as a term of technical silviculture, it is an unhappy attempt at redefinition of a logging term and might better be replaced.</i> David Smith (1986)</p>	
54.	<p>Do logging strategies in the headwater basins address the possibility of future heavy sustained rainfall events and flooding events in our watersheds (as was experienced in 2005)?</p> <p>The conservation of water in "the high country" is of paramount concern." "Water is a sustainer of life; everything comes to the water." Will the C5 plan safeguard the Eastern Slopes watershed?</p> <p>Recent clearcut logging in the Oldman headwaters has negatively affected the watershed. Will the C5 plan perpetuate watershed impacts through logging?</p>		<ul style="list-style-type: none"> <li>Existing IRPs place a high priority on watershed retention.</li> <li>ECA Alberta and WRENS-AB are the tools being used by ASRD to test whether proposed logging activities will create unacceptable hydrological impacts to watersheds and to stream flows.</li> <li>"Hydrologic Effects of Forest Harvesting for the C5 FMU" (see Appendix 6C) states that:  <i>"The results from this analysis indicate that simulated increases in annual yield, ECA, and peak flows based on the proposed harvesting plan are likely not significant, and well below the detection limit using standard hydrometric techniques. As a result, the simulated increases in annual water yield and maximum daily flows should not be significant threat to aquatic habitats or fauna."</i> (Executive Summary)</li> </ul>	

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55.	<p>The "proposed logging plan in and around the Crowsnest Pass is far too devastating". It will "kill the Pass" (i.e., it will hinder the tourism industry) which is based upon the local scenery. The C5 plan threatens the sustainability of the Crowsnest Pass area.</p> <p>Many people chose to live in the Pass because of the beautiful views – clear cutting will change all that for the worse. We have to protect the aesthetics of the Pass!</p> <p>The Lost Creek fire should not be used to create fear in residents of a future fire threat and so justify clearcutting in the Crowsnest Pass. Logging that is being proposed in the Pass would never be allowed to take place in the Canmore corridor.</p>		<ul style="list-style-type: none"> <li>• A visual assessment of Crowsnest valley along Hwy #3 was completed and visual quality objectives have been established for the Crowsnest Pass (see Visual Resource Inventory map)</li> <li>• Future AOPs and Final Harvest Plans (driven by Firesmart planning, the C5 FMP, and SHS) will need to explicitly consider landscape aesthetics in the Crowsnest Pass and in the vicinity of the new proposed recreational resort. Future harvest plans will be made available for public review.</li> <li>• New Crowsnest Pass Public Advisory Committee will be consulted on various ASRD initiatives in the Pass including timber harvesting prescriptions that take local scenery into account</li> <li>• Because forests are dynamic systems, the scenery associated with forests will not remain static</li> <li>• Visual forest management objectives are found in Objective #30 of the FMP</li> </ul>	
56.	An "abundance of environmentally sensitive outdoor recreation would not be possible if the C5 FMP proceeds as is."	Obj. 35 Obj. 39	<ul style="list-style-type: none"> <li>• While the C5 FMP does not explicitly address outdoor recreation (what kind, how much, and where), it is recognized that timber harvesting will affect recreational experiences. Forest harvesting creates access networks which historically have been extensively used by recreationalists.</li> <li>• The incremental, confined nature of logging on the active landbase ensures numerous opportunities exist for environmentally sensitive outdoor recreation through the FMU</li> </ul>	
57.	Outdoor recreation, tourism, the environment, scenery, wildlife habitat are negatively affected by the C5 Plan. They	Obj. 34-39	<ul style="list-style-type: none"> <li>• These activities were considered during the development of the C5 FMP</li> </ul>	

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	should be given a higher priority.		<ul style="list-style-type: none"> <li>• Approved IRPs indicate that forestry is a legitimate land use that should continue in the FMU. The integration of forestry with other land uses is addressed to some extent in the FMP</li> <li>• Timber harvesting can be advantageous to various non-timber activities and wildlife.</li> </ul>	
58.	With respect in particular to the health of watersheds, wildlife habitat and biodiversity, the government has identified the proper venue for addressing these values as updated Integrated Resource Plans. Comments have been made by other agencies such as the EUB about the need to update these plans. The government has also described any forestry planning as necessarily being subordinate to the primary values outlined in IRPs. In the case of the existing IRPs for the C-5 Area, which the government has inexplicably hesitated to update, the primary value is watershed protection consistent with the East Slopes Policy. Yet, there remains no comprehensive attempt by ASRD to address in a comprehensive fashion the deep challenges faced by the public lands of C5.	Obj. 24	<p>The FMP does not deny or dispute what is stated in the 2001 (revised, <u>not yet approved</u>) Castle River IRP:</p> <p><i>"The 1985 IRP provided direction for managing and allocating public land and natural resources in the Castle River. Four broad goals were identified in the 1985 plan:</i></p> <ul style="list-style-type: none"> <li>• <i>protection of a land base for intensive and extensive recreation opportunities;</i></li> <li>• <i>preservation of watershed values and wildlife and fisheries habitat;</i></li> <li>• <i>maintenance of domestic livestock stocking rates and mineral resource exploration and development opportunities; and</i></li> <li>• <i>establishment of a forest land base."</i></li> </ul>	
59.	As ASRD is very aware, the greatest threat to the land base is the cumulative effect of human impacts, which individually appear insignificant but which in total threaten values such as watersheds, biodiversity, habitat, human access and enjoyment. The C5 plan in general makes overtures that appear to respect the need to address cumulative effects, yet the management of other values in particular water and		<ul style="list-style-type: none"> <li>• Sustainable forest management (SFM) – as a planning system – was adopted to ensure that non-timber values were considered</li> <li>• Cumulative effects falls outside the scope of the FMP</li> <li>• The focus of the FMP is on forest management and timber harvesting integration with other values</li> </ul>	

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	wildlife values appear largely to be optional and often very vague. ASRD "may" act in accordance to with their responsibilities here, but timber cutting is defined in far greater detail. In the updated " <a href="#">Recent changes made to the C5 Forest Management Plan</a> " (December 2005) link on the ASRD website, several addenda attempt to provide a clearer picture of how ASRD will manage for watersheds, biodiversity, wildlife habitat. While this is a step forward from the original plan provided for comment, ASRD cannot escape the truth that these management objectives should be clearly updated, explored and operationalized in functional IRPs for this region, not in a forestry plan. In the case of C5, Albertans are being offered a forestry plan that attempts to mitigate its impact without a full exploration of what is required to maintain the other environmental, economic and social values on the public lands defined as C5.			
60.	In 2005, ASRD was presented with <i>Selected Ecological Resources of Alberta's Castle Carbondale: A Synopsis of Current Knowledge</i> . The aim of this synopsis is to centralize in one resource an accurate assessment of the ecological health of the Castle area for the general public, recreationists, academics, industry, and decision makers in various levels of government. The report's author concludes the future of the Castle's gems such as its grizzly bear, bull trout, rich vegetation populations is bleak if action is not taken. Noting the warnings of the Alberta government's own tribunals, the author describes the Castle as being managed		<ul style="list-style-type: none"> <li>The FMP is not the appropriate place/plan for managing the full range of ecological resources which are found in the Castle-Carbondale area. Direction offered in the FMP is intended to ensure that valued ecological resources are not compromised by timber harvesting or forest management activities.</li> </ul>	

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	with an outdated management plan that is incapable of addressing the cumulative human effects on the region. ASRD officials stated the report is a "valuable synopsis of...ecological resources in the (area)" and that it would contribute to the understanding necessary to improve ASRD's "management processes" for the Castle. Yet in the C5 FMP, the primary lesson of the Synopsis - that management must be comprehensive with a strong view in advance to the cumulative impact of human development on ecological resources – appears lost in an FMP that outlines clearly what it wants for Forestry but not for other values.			
61.	The C5 FMP is not capable of adequately addressing several non-timber values be they social, economic or environmental.		<ul style="list-style-type: none"> <li>• Other planning initiatives need to address non-timber values in the FMU.</li> </ul>	
62.	Within the C5 FMP, ASRD's Fish and Wildlife division is given token consideration for adaptive management. Yet management objectives are rather vague in comparison to the details afforded to timber harvest. It is difficult to believe that these threadbare considerations for wildlife and watersheds will be defended in light of the detailed level of planning afforded to industry. The fact that there is no assessment of the cumulative effects of disturbance on the landscaped points again to the fact the C5 FMP is not the venue for addressing the needs of wildlife and watersheds.	Criteria 1-3	<ul style="list-style-type: none"> <li>• The C5 FMP is not the primary avenue for addressing the needs of wildlife and watersheds, although both of these themes were considered during plan development.</li> </ul>	
63.	It is recommended that the C5 FMP be held back from implementation until such time as the Castle and Livingston		<ul style="list-style-type: none"> <li>• "The Living Document" contained recommendations that were presented to the Government of Alberta. It does not contain</li> </ul>	

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	Porcupine IRP areas are thoroughly reviewed. These reviews should occur in light of new options for protected area designations called for in "The Living Document" for the Castle and the CSMA IRP Draft 2001. Once this process is complete, the C5 FMP process could be revisited with the proper perspective offered by updated IRPs. In the meantime, ASRD should employ a very conservative interim forestry plan for the area for no more than one year.		government policy. "The Living Document" was thoroughly reviewed and considered by provincial departments; most recommendations were acted upon resulting in the creation of 2 designated sites (an ER, and SMA) and an update of the Castle River IRP. "The Living Document" no longer has any official status in current decision making.	

The last meeting with the Crowsnest Public Advisory Committee (CrowPAC) occurred on March 29, 2006. At this meeting, the following summary developed by the CrowPAC members was presented to SRD staff for consideration.

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March 29, 2006

To: The SRD C5 Working Group  
From: CrowPAC

*The members of CROWPAC are appreciative of having had the opportunity to provide input into the C5 Forest Management Plan 2000 - 2026. The process has been a lengthy and detailed one that required a great amount of effort for all involved. Sustainable Resource Development staff has put in countless hours to provide information to enhance our decision making and hopefully make our advice relevant. Everyone on CROWPAC has gained a much improved understanding of the complexity of proper forest management and the multiple values of the forest. That is due to the work and support of the SRD staff and commitment of CROWPAC members.*

*SRD is to be commended in trying to bring together a diverse group in the CROWPAC so as to represent the diversity of values that the citizens of Alberta hold for our forested lands. Because of the diversity of views and values one would reasonably expect the resultant plan to be a compromise and that is the case. The FMP sets a lofty goal (page 9) in managing forestry practices to supply a continuous flow of timber while ensuring the health, well being and sustainability of the forest ecosystem. It states that a wide range of cultural, educational, economic and social benefits will be achieved in conjunction with the timber harvest and that the natural environment will be protected and environmental quality will be maintained (page 10). At the same time it recognizes that detailed planning to address the non-timber values are not a part of the C5 FMP. It states that some are addressed in other processes or legislation while many others have yet to be addressed. These other values are vitally important to the both the health of the forest and the benefits that present and future Albertans will derive from the forest. It is vital that they not be lost in any future planning or execution of those plans*

*While the current FMP is an improvement over what had previously been in place, all members of CROWPAC very strongly recommend and wish to have placed in the record, a number of points that will hopefully ensure that the values that we all worked so hard to develop are reflected and operationalized in this FMP and any future integrated system of plans and regulations through which the citizens of Alberta obtain the maximum benefits that can accrue from our forests.*

- *The objective with the highest priority for CROWPAC is water quality. The FMP investigates affects to water flow from timber harvest but does not include potential issues of water quality.*
- *Alberta Sustainable Resource Development is the manager of The C5 Forest Management Plan 2006 – 2026. It is essential that the Government of Alberta provide SRD sufficient financial and other resources to effectively monitor and adaptively manage the program. The plan quite rightly stresses the importance of adaptive management, measurable targets, the application of a sound scientific research and a precautionary approach. Inherent in the process is the need to support further scientific research on all values of the forest and its healthy sustainability. To achieve those ends requires the careful application of adequate resources. Sound planning practice involves the detailed commitment of financial resources and manpower as part of the plan.*

- *Repeatedly, those knowledgeable of forest management have stressed the uniqueness of the C5 area. Given that Alberta is growing dynamically and changing, that the area is under threat from pests and climatic change and that increased demands from all sections of our society are going to be placed on the forests of C5, it is essential that the planning be proactive and utilize the best information currently available. Members of CROWPAC have serious reservations regarding their confidence in the inputs to the TSA Model and AVI / Yield Curves, to name but a few, as well as comparative data with which to develop baselines. In reviewing the TSA, the amounts of timber harvested, its sequencing and the sustainability of that harvest are quite apparent. What is not clear is how the computer modelling takes into account all the other values that we developed and identified as objectives. We know that it is thought by SRD that run 90022 will in 20 years best meet the desired future forest criteria but confidence by CROWPAC and perhaps SRD in that prediction is low especially concerning the non-timber values of the forest.*
- *There are four scenarios covering the mountain pine beetle listed under 4.4.1 of the timber supply analysis. Scenarios 2 and 3 are listed as future possibilities. Under scenario 2, harvest volumes could exceed 500,000 m3 per year and carry with it serious ecological and environmental liabilities. There have been no calculations made as to when scenario 2 would be abandoned in favour of scenario 3. This shortfall needs to be addressed otherwise we run the risk of passing on a resource exploited for immediate gain, instead of a resource where natural capital was properly accounted for.*
- *Maximum cut block sizes as currently defined are a concern. Our committee believes current cut block maximums coupled with low retained structure have great potential to compromise the ecological and social values inherent in the plan.*
- *The plan centers on the sustainable harvest of timber while considering other values. This is clearly an economic point of view. However no one has yet been able to provide a reliable analysis of the economic benefits derived from the other ways in which we use the forest. This is an area which is quantifiable and should be addressed if we are looking at the maximizing benefit to Albertans. The forest may be able to generate equivalent revenue in more socially and ecological friendly ways.*
- *Important issues such as fragmentation, connectivity and interior habitats have not been addressed in the FMP or in some form of environmental assessment, nor have the cumulative effects been considered in the planning process. We suggest they should be an important component of the forest management plan.*
- *The 144,000 m3 Spray Lakes carryover coupled with cutting that may be necessary in the immediate future to combat Mountain Pine Beetle could seriously compromise the other values that we hold for the forest.*
- *In order to garner public support for future plans it should be made clearly apparent to the public how expertise from areas such as wildlife, fisheries and water management, to name but a few, have contributed to the plan, how they are monitoring the results, how those results compare to the identifies targets and how that monitoring is resulting in adaptive management. Review of the current plan and any future plan by a panel of independent experts from relevant disciplines would certainly add credence to the process.*
- *In fairness to all parties the operational guidelines for the plan have to be clear, attainable and enforceable. So too, they have to be enforced with sufficient consequences both positive and negative.*

- *Topics such as further protected areas and access management planning will likely have to be integrated in future planning.*
- *A portion of the increases to the AAC should go to the Community Timber Program.*
- *Considering the increased pressures and changes occurring on the C5 landscape the forest management plan should encompass 10 years, not 20. The proposed 10 year review should be conducted 5 years into the plan.*

*CROWPAC is a group chosen by SRD to provide input and represent the public's best interest, as we see it, in developing the 2006 -2026 C5 Forest Management Plan. After much discussion and deliberation the members of CROWPAC believe there are enough uncertainties regarding the FMP's ability to achieve the ecological and social priorities, as represented in the Preferred Future Forest and Timber Supply Analysis sections, to let it be known both to SRD and the public that we cannot entirely support and defend those sections. We recognize that much careful thought and effort has gone into the entire process. However we feel compelled, in the public's best interest, to point out our concerns. To do less, we believe, could pose too great a risk to our forests and all the benefits that they provide for current and future Albertans.*