

APPENDIX ONE
TECHNICAL ITEMS CHECKLIST

DFMP

DETAILED FOREST MANAGEMENT PLAN

TEXT REPORT



BLUE RIDGE LUMBER INC.
A SUBSIDIARY OF WEST FRASER MILLS LTD.

BLUE RIDGE LUMBER DFMP APPROVAL CONDITION CHECKLIST – TECHNICAL ITEMS

ISSUE #	2004 DFMP SECTION	PAGE	SUBJECT AREA	DOCUMENT SOURCE TEXT	RECOMMENDATION/ACTION	IMPORTANCE	COMPLETE
1.	General		FMU References		Replace references other than those needed for historical context.	Requires follow-up	Yes
	Issue/Comment: Text still contains references to W2/W3/W4 as being current FMUs.						
	Response: Text revised.						
2.	Section 5.5	111	Access Management		Although the FMA is heavily developed, thought needs to be applied to propose an optimum long term access plan.	Requires follow-up	Yes
	Issue/Comment: There is no long term access development plan.						
	Response: Road corridor development plan included in Section 4.2.2.16 of DFMP text report.						
3.	Executive Summary	2	Carry-over Volume	The audited green carry-over volume is 940,942 m ³ ...	This needs to be tied to a final approved harvest level.	Requires follow-up	Yes
	Issue/Comment: This needs to be adjusted in light of the May 17, 2004 letter which identifies 731,503 m ³ .						
	Response: BRL carry-over has been adjusted in the PFMS sensitivity analysis.						
4.	TSA Section 4.2.3	4-5	Carry-over Volume		This item should be clearly identified to Blue Ridge Lumber. Providing that the unused volume allowed by Blue Ridge in the May 17, 2004 letter does not increase, there is volume available within the PFMS to address Mostowich needs. The Department has already approved an even-flow of the Mostowich unused conifer volumes for 8 years ending 2011.	Requires follow-up	Yes
	Issue/Comment: The PFMS has not accounted for the Mostowich conifer unused volume for CTQW020022 of 91,272 m ³ . Mostowich has requested that this volume be operated over an 8 year period. This volume may have some impact on the conifer volume flows as projected in the PFMS depending on the unused volume scenario for BRL.						
	Response: Mostowich carry-over has been adjusted in the PFMS sensitivity analysis.						
5.	6.4	232	Conifer Understorey	Understorey conifer protection. The understorey leaf off inventory on the 9 townships has created D(C) stands based on the existence of an understorey based on some rules over number, size and dispersion of the understorey stems.		Requires follow-up	Yes
	Issue/Comment: A couple of problems here (1) the height classes overlap with "a)" stating the average height would need to be "<8m" but "b)" states the other case as being where the average height is ">7m" - these classes don't work. They've got there <> signs mixed-up based on Fig1-7 in the TSA document (2) The stem density values are of limited interest since it is the dispersion on stems that is critical rather than the absolute number (3) There is no minimum characteristics of what constitutes a 'countable' stem such that where the height criteria is "<8m" "average" does that mean that .01 m trees are averaged against 10m trees? Acceptable tree minimums need to be used. (4) Where is the data to suggest that 10m ³ /ha of understorey "merchantable conifer" is left after a "D(C)" stand is cut with understorey protection? (5) Why is the assumption that all such "D(C)" stands are to be considered as "20 years old" in the model, (6) What is the basis for modeling these stands as being low stocking "AB density" mixedwood curves after a protection harvest. Would not the aspen regeneration reasonably well and the protection spruce are evenly distributed (P3-P6 dispersion codes)? Change the composition code of D(C) to mean a "D with understorey" since D(C) was a D stand with a small component (<11%) of co-dominant C. They have usurped this species code for another purpose.						
	Response: This section rewritten in DFMP text report and conifer understorey protection practices are included in OGR's signed by BRL August 9, 2005.						
6.	TSA Document	232-233	Conifer Understorey			Requires follow-up	Yes
	Issue/Comment: BRL has adopted most of SRD protection OGR's from the planning manual but eliminated all reference to acceptable stems - go hand in hand. Why protect understorey that won't contribute to future AAC? Acceptable stems have a minimum height, 50% live crown ratio and are within 75% of the average height with good form and vigour.						

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<p>Response: This section rewritten in DFMP text report and conifer understorey protection practices are included in OGR's signed by BRL August 9, 2005.</p>							
7.	1.3.7.2	1-14	Conifer Understorey	Conifer Inventory Age		Requires follow-up	Yes
	<p>Issue/Comment: The "understorey" label on the inventory has now been lost--why. Note in table 1-3 there are 17% of the enumerated spruce that are in the 20m+ height class (clearly canopy co-dominant unless they have really, really good aspen around). Also 44% of the measured Sw were in the 10-20 class, a class that also likely has a goodly number of co-dominant trees. Also the age determination assumed stump height age equals total age. This is bound to be wrong in truly "understorey" trees as has been published by Peters et al. 2002.</p> <p>Response: Using "co-dominant" trees in the regression strengthened the validity of the fitted curve. The age determination process reflects that stump height age is likely a better predictor of physiological age rather than total age. It is important to remember that this is a less than 3,000 ha trial initiative based off of local data and knowledge. As more data becomes available it will be incorporated into future plans.</p>						
8.	1.3.7.2	1-17	Conifer Understorey	Conifer Understorey Classification Scheme		Requires follow-up	Yes
	<p>Issue/Comment: (1) Disagree with the >8m and 299 stem or the <7m and 499 basis for allocating D stands with understorey to a D with C understorey class. (2) Good use of the dispersion as a criterion here, but this is still way to crude and only supported by "a review (by BRL) of the inventory information along with extensive field information". (3) A critical key point is that the stem count includes ALL Sw -- again NOT just understorey -- not the height data from previous section showed canopy dominants as part of the count AND also any/all spruce were counted apparently down to stems that were 0.3 m tall (appendix B). (4) The density is "combined" across all layers but the height used is that of the "primary layer unless (it) is within 5m of the AVI overstorey height" (footnote, Figure 1-7, page 1-17). If the densities are "combined" (assume simply added) but the height is selected as the "primary layer height (if its density is > 499 sph). How can SRD possible use this data since it is possible that a huge chunk of the understorey is much smaller than the assumed height. This is very problematic. Especially since this height is used to assign an age through the height/age regression. (5) Stem dispersion codes are "combined" by summing them, unsure that this is reasonable given that two layers may share the same horizontal space. Note that the program code (pg 1-19 section 1.3.8.2.5) constrains the summed dispersion value to a maximum of 6 - meaning that it could/was possible to sum to more than the maximum dispersion (i.e.6) -- the layers are sharing the same horizontal space. (6) Since the new conifer polygons were drawn "independently" of the AVI polygons, how can one determine if the height of the conifer is within 5m of the height of the AVI polygon -- especially if the "conifer polygon" straddles several AVI polygons? (per the point above).</p> <p>Response: (1) It is important to remember that this is a less than 3,000 ha trial initiative based off of local data and knowledge. As more data becomes available it will be incorporated into future plans. (2) The dispersion code comes from photo interpretation and is deemed to significant of a measurement to ignore. The dispersion code directly links to whether or not a stand should be considered D(C). (3) All trees within 5 m of the AVI overstorey were NOT counted. (4) If the primary conifer layer is less than 400 stems, and the secondary layer is the majority, the understorey height is used, NOT the overstorey. (5) Summing the dispersion codes is reasonable since it is highly unlikely that a photo interpreter was able to see two separate conifer trees of different height that share the same horizontal space. For dispersions summed to greater than 6, we are assured that the polygon is stocked regardless of overlap. (6) An overlay of the AVI and the conifer inventory was conducted.</p>						
9.	1.3.7.2		Conifer Understorey	Conifer Understorey Classification Scheme		Requires follow-up	Yes
	<p>Issue/Comment: There must be minimum "acceptable" tree criteria for understorey trees that contain elements of "good form and vigour" as well as a minimum Live Crown Ratio. Otherwise trees that will never become crop trees are contributing to the density counts.</p> <p>Response: This section rewritten in DFMP text report and conifer understorey protection practices are included in OGR's signed by BRL August 9, 2005. All future BRL conifer understorey inventories will follow SRD protocols.</p>						
10.	3.2.2	3-7	Conifer Understorey	Figure 3-1. Conifer Understorey Protection Strategy --		Requires follow-up	Yes
	<p>Issue/Comment: A few points: (1) Deciduous harvest volumes dropped by 10% at Understorey Protection (UP) harvest to account for wind buffers to protect spruce ...this seems reasonable, except that the buffering usually targets a stem density/distribution rather than a volume. (2) Why a reduction in 10m³/ha in "incidental merchantable conifer" with understorey protection? Why is the UP harvest leaving merchantable conifer volume around? (3) At the UP harvest the conifer YC is disjointed due (presumably) to a loss in Sw volumes associated with the UP harvest. How did BRL decide how much of a drop the YC should take to account for this? There is no discussion as to the size of the drop in yield between before and after UP harvest and how it might change as densities and/or dispersion differ. (4) After a UP harvest the stands are put on an AB density mixedwood curve, but the mixedwood curves are Mx - so the deciduous/conifer proportion is lost. It may be the Mx curve works reasonably well for natural stands in their area but the level of Sw left after a UP harvest will vary considerably so that putting all "D(C)" stands onto a Mx after a UP harvest seems very simplistic. Should be a CD and a DC mixedwood curve. (5) A post UP harvest assessment survey as SRD has developed should be used to test if these assumptions on yield transitions are being met and where NOT being met, AAC adjustments should be made say within 5yrs.</p>						

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<p>Response: (1) The 10% reduction was based upon stem density removal, however a volume reduction was used for modelling. (2) A 10m³/ha reduction was used to reflect situations where an operator may choose to leave a barely merchantable stem rather than damaging several other unmerchantable stems. (3) Not sure what this point is referring to, conifer curve is not disjoint. The 10% reduction to the deciduous curve is considered lost volume since it is very unlikely that the deciduous trees left in the first rotation will make it to the second rotation. The transition after UP harvest is to an AB density mixedwood yield curve thus accounting for the stem count reduction. (4) MX yield curves were approved April 16, 2002 for use in the TSA. (5) BRL is currently in the process of developing ARS standards.</p>							
11.	3.2.2	3-7	Conifer Understorey	Figure 3-1. Conifer Understorey Protection Strategy --		Requires follow-up	Yes
	<p>Issue/Comment: What happens if the UP requires that the areas be planted, will a 50 year rotation be enough? If the planted stock is considerable will they reset the age to 0 to allow the seedlings to achieve merchantable size. BRL has reduced the Sw incidental cut by 10m³/ha to account for incidental left behind to get bigger. There should, therefore, be a monitoring system for this. On the remainder of the FMA any incidental left standing will have to be charged against their AAC.</p>						
	<p>Response: This strategy is only being applied to 3,000 ha on the FMA and therefore the best sites will be selected.</p>						
12.	Section 6.4 Strategy for Protection of Coniferous US	233	Conifer Understorey	The goal in avoidance protection will be to achieve >=50% harvest protection of unmerchantable conifer understorey.	Some refinement may be warranted	Requires follow-up	Yes
	<p>Issue/Comment: Where does this target number come from? The ability to achieve this will highly depend on the size, continuity and density of the understorey trees.</p>						
	<p>Response: This section rewritten in DFMP text report and conifer understorey protection practices are included in OGR's signed by BRL August 9, 2005.</p>						
13.	Section 6.6 Integration of Operations	237	Conifer Understorey	Table - Penalty for not protecting Understorey	Consider monitoring opportunities.	Requires follow-up	Yes
	<p>Issue/Comment: This is always an option, but this process precludes the necessary monitoring to make this strategy work.</p>						
	<p>Response: This section rewritten in DFMP text report and conifer understorey protection practices are included in OGR's signed by BRL August 9, 2005.</p>						
14.	4.2.13	4-34	Future Forest	Old growth forest in 100 years		Requires follow-up	Yes
	<p>Issue/Comment: Why is all old growth forest in Sb with some deciduous? Why not Sw?</p>						
	<p>Response: As per DFMP approval condition #5, BRL is committed to completing an analysis of the natural range of variability (NRV) to develop scientifically based targets for the future plans.</p>						
15.	Section 1.1 cross-reference to TSA Figure 4.8	DFMP 5 TSA 4-26	Future Forest	"The ecosystem management approach which is currently favoured by Blue Ridge Lumber as an initial option is a "coarse filter approach", by maintaining "the natural disturbance regimes: of the area.		Requires follow-up	Yes
	<p>Issue/Comment: The coarse filter approach favours a variety of habitat types over time. According to Figure 4.8 the PFMS will result in an erosion of the available habitat in the 81-120 and the 121-160 age classes. This figure does not even address how the variation exists by leading species.</p>						
	<p>Response: This section rewritten in DFMP text report. As per DFMP approval condition #5, BRL is committed to completing an analysis of the natural range of variability (NRV) to develop scientifically based targets for the future plans.</p>						

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16.	Section 3.9	41	Future Forest	Because of this current diversity of CWD, Blue Ridge Lumber does not intend to manage for CWD or to develop or implement guidelines at this time.	Situation to be monitored for inclusion in next FMP	Requires follow-up	Yes
	Issue/Comment: There is a process in place with the Zonal Ground Rules						
	Response: CWD practices are included in OGR's signed by BRL August 9, 2005.						
17.	TSA Section 3.0		Future Forest		There is insufficient analysis to demonstrate that other resources are not impacted by the PFMS single pass harvest level.	Requires follow-up	Yes
	Issue/Comment: There is minimal information regarding impact assessment of harvesting in a single pass versus a two pass system. Will there be a sufficient distribution of habitat types to meet the "coarse filter approach". It appears that most of the analysis that would objectively address this issue will not be available till future plans.						
	Response: The single pass versus two pass system is analyzed in Section 3.4 of the DFMP TSA. The assessment includes patch size, edge comparisons and seral stage patches.						
18.	Section 3.10	Pg 40	Future Forest	Coarse woody debris	Developing pre-harvest, post harvesting monitoring. Opportunity to align post-harvest data collection with regeneration survey timing.	Requires follow-up	Yes
	Issue/Comment: BRL offers a CWD assessment and average total volumes for classes of high, moderate, and low. How will this be monitored over the course of the plan to ensure that objectives relative to CWD are being met?						
	Response: CWD practices are included in the OGR's signed by BRL August 9, 2005.						
19.	Section 3.10	Pg 4-33	Future Forest	Distribution of Older Interior Forest	Clarify in approval that company will be expected to set clear objectives and targets.	Requires follow-up	Yes
	Issue/Comment: Plan shows a significant shift in interior forest from with pine and white spruce leading all but disappearing. The black spruce numbers are likely a result of being in the excluded landbase and just being aged. Is BRL comfortable with this trend?						
	Response: See VOITs in Section 12.0 of DFMP text report. As per DFMP approval condition #5, BRL is committed to completing an analysis of the natural range of variability (NRV) to develop scientifically based targets for the future plans.						
20.	5.4.2	87	Genetic Policy	Paragraphs here discusses "seed provenance rule" of movement restrictions of 50 miles or 500 feet.		Requires follow-up	Yes
	Issue/Comment: This seed movement rule is no longer in force and has been replaced with seed zones listed in the Standards for Tree Improvement in Alberta.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
21.	5.4.12	108	Genetic Policy	Genetic Tree Improvement, last paragraph states that "planting genetically improved stock is expected to raise volume growth by 10% from seed produced in the first cycle...A further gain of 10%...can be realized in the year 2016..."		Requires follow-up	Yes
	Issue/Comment: Such volume gains through genetic stock need to be supported hard data/reports. One would also need to see a monitoring program that would substantiate If this genetic gain was actually realized.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						

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22.	Section 5.4.1 General Overview	83, 84	Genetic Policy	To use Siberian larch as an acceptable species for regeneration surveys when it is encountered in the field.	The use of Siberian larch needs to be excluded from this DFMP.	Requires follow-up	Yes
	Issue/Comment: Blue Ridge Lumber promptly reclaims and reforests roads, landings, gravel pits, borrow pits, etc. and the planting of Siberian larch, which has proven to be successful, is occasionally used for this purpose. The use of larch has not been approved for operational deployment therefore this should be addressed now. (all other references to Siberia larch)						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
23.	5.4.1	83 & 84	Genetic Policy	General Overview		Requires follow-up	Yes
	Issue/Comment: Siberian larch is identified as non-local stream 2 or research material in the Standards for Tree Improvement in Alberta. As such, it requires an approved Research Plan prior to consideration for research testing or operational deployment under a stream 2 Controlled Parentage Program.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
24.	5.4.2	86 & 87	Genetic Policy	Cone and Seed Collection	Advise that procedures in STIA manual be followed for cone and seed collection	Requires follow-up	Yes
	Issue/Comment: Provenance rules have been replaced by a seed zonation system since implementation of STIA; companies may choose to be more stringent regarding movement within seed zones.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
25.	5.4.12	108	Genetic Policy	Genetic Tree Improvement		Requires follow-up	Yes
	Issue/Comment: At present, Blue Ridge Lumber's Orchards for Breeding Region C lodgepole pine and D white spruce are not in compliance with STIA standards and seed from the orchards is not approved for deployment						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
26.	5.4.12	108 & 109	Genetic Policy	Genetic Tree Improvement	include section stating compliance with STIA standards and Department directives in establishing in situ reserves (ATISC can assist with this section)	Requires follow-up	Yes
	Issue/Comment: no mention if in situ conservation effort requirement for companies engaged in Tree Improvement.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
27.	5.4.1	83, 84	Genetic Policy	General Overview	Advise that Siberian larch not approved for operational deployment and follow testing requirements in standards for tree improvement manual.	Requires follow-up	Yes
	Issue/Comment: BRL states they have planted Siberian larch (middle of page 83) and intend to do so (top of 84), BRL is not authorized to plant Siberian larch. Must employ the risk management testing outlined in the Standards for Tree Improvement before operational deployment will be considered.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
28.	5.4.2	86	Genetic Policy	5.4.2 Cone and Seed Collection	Advise that the STI Manual will be followed for cone and seed collection.	Requires follow-up	Yes
	Issue/Comment: BRL should reference the 'Standards for Tree Improvement in Alberta' here and that the manual will be followed for cone and seed collection operations and processing. This replaces the procedures mentioned in this section. I.e. 'the seed provenance regulation' doesn't exist.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
29.	6.5	234	Incidental Conifer	6.5 Incidental Conifer Replacement	Ask for the necessary detail on incidental conifer replacement - what has been done to date, what is the future strategy, how will it be tracked and reported?	Requires follow-up	Yes

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	<p>Issue/Comment: DFMP mentions that BRL will work with the DTA holders to select appropriate areas to reforest incidental. Supply more detail about what they have done to date with the conifer that has been harvested and received by BRL, how BRL will track and report replacement, and replacement strategies (i.e.. low density planting, increase stocking on mixedwood sites, underplanting).</p> <p>Response: Incidental conifer replacement strategy approved August 3, 2005. Text revised.</p>						
30.	Section 6.7 Industrial Salvage	238	Industrial Salvage	All deciduous salvage in W3/W4 will be made available to MWFP and is chargeable to their DTA.	There needs to be acknowledgement that BRL may need to charge industrial salvage deciduous to their production.	Requires follow-up	Yes
	<p>Issue/Comment: There may be deciduous that comes from conifer landbase / stands</p> <p>Response: Industrial salvage strategy approved ____, 2005. Text revised.</p>						
31.	Section 5.3.11 Cut Control	DFMP 79	Misc.	FMA quadrants coincide with the Quota quadrants...	Change to reflect actual quadrants.	Requires follow-up	Yes
	<p>Issue/Comment: This is incorrect. Under section 2 (1) and 12 (1) of the Blue Ridge Lumber FMA (OC 505/95, the FMA term of September 1, 1995 to August 31, 2015 is "divided into four cut control periods each with a duration of five years." The quadrants then are 1995-2000, 2000-2005, 2005 -2010 and 2010-2015.</p> <p>Response: Text revised.</p>						
32.	5.5.4	115	OGRs	6th paragraph. Native bridge reclamation is stated as leaving the logs in place but removal of the top soil and burlap layer		Requires follow-up	Yes
	<p>Issue/Comment: There is a requirement to remove the entire structure when the bridge is no longer in use.</p> <p>Response: Text revised.</p>						
33.	Section 8.1	249	OGRs	OGRs		Requires follow-up	Yes
	<p>Issue/Comment: Need to update operating ground rules</p> <p>Response: OGR's signed by BRL August 9, 2005.</p>						
34.	Section 5.4.10 Balsam Fir as Regen Species	107	Regeneration Standards	BRL Inc. received approval from the Area Manager, Woodland Area on April 14, 2003 to use balsam fir as an acceptable regeneration species in our FMA and Quota operations.	This section needs to clearly state the commitment to use balsam fir and thus the use of balsam as a valid regeneration species is adopted	Requires follow-up	Yes
	<p>Issue/Comment: The statement overstates the approval letter in a very gross manner. The letter from the Area Manager was approving the use of balsam fir as a valid regeneration species in 2 specific blocks within the FMA. The letter also encouraged these strategies to be worked through the DFMP and pre-planning stages rather than post-harvest.</p> <p>Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.</p>						
35.	5.4	85	Silviculture Table	Silviculture Strategy Summary - Table 4		Requires follow-up	Yes
	<p>Issue/Comment: This table as it stands is not meaningful. Note that Aw and Aw leading stands may be planted with 0-1800 sph except Aw(Pb) that may have between 0-1500 sph, pure Aw stands may be drag scarified, disc trenched or plowed. Rationale for what site/stand triggers would result in what treatments. Note that BRL has committed to PHA on all blocks, no need to be "reactive" to things found after harvest.</p> <p>Response: Table presented at December 10, 2004 DFMP meeting and approved December 13, 2004 by Scott Milligan. Text revised.</p>						

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36.	Table 4	85	Silviculture Table	Silviculture Strategy Table	Ask that BRL remove all the caveats under the table except the footnote, and that they need to plant at least 1600 sph in Sb and Sw sites (0-1600 not acceptable).	Requires follow-up	Yes
	Issue/Comment: Whole table is negated with the description of why it can't be adhered to underneath the table. Would prefer that this description be removed since the table already has 'options' and flexibility (i.e., both Yes and No are listed in several columns). For planting density, anything less than 1600 stems per hectare for spruce stands is unacceptable if current regeneration standards are to be attained, so 0-1800 isn't approved for Sb and Sw leading species stratum. Lower densities may be considered if justified.						
	Response: Table presented at December 10, 2004 DFMP meeting and approved December 13, 2004 by Scott Milligan. Text revised.						
37.	Section 5-4	Pg 84	Silviculture Table	Silviculture table	Redo table. Reduce possible ranges, estimate how much area will be assigned a particular treatment	Requires follow-up	Yes
	Issue/Comment: Table strategies are too broad to be of much use. Template had ranges of planting with 200 stems, table rage is 1800 stems/ha. No area estimates						
	Response: Table presented at December 10, 2004 DFMP meeting and approved December 13, 2004 by Scott Milligan. Text revised.						
38.	Section 8.1 Timber Harvest Guidelines	232	Structure Retention	10% of deciduous volume is left uncut...	The flow for the volume needs to be clear over time, as well as the monitoring process to verify the assumptions made.	Requires follow-up	Yes
	Issue/Comment: This strategy has been put forward as the sole structure retention strategy as part of this DFMP. The main issue in discussing structure retention is in the manner that the retained merchantable volume is tracked or charged as production. The key being that volume is not double accounted.						
	Response: Structure retention strategy approved August 3, 2005 and included in OGR's signed by BRL August 9, 2005. Text revised.						
39.	Section 6.4 Strategy for Protection of Coniferous US	252	Structure Retention	Table 30 Section D7.0 Structure Retention and Understorey Protection	There needs to be a more comprehensive structure retention strategy as part of this DFMP.	Requires follow-up	Yes
	Issue/Comment: This section refers to conifer understorey protection, where the primary role is to generate conifer to fill in the age class gaps. Structure retention is a key factor in ensuring the "coarse filter approach" is more thoroughly implemented. Given that older age classes will be very sparse on the landscape, primarily for the commercial conifer species, structure retention may play a crucial role in providing "habitat characteristics" where the habitat is not fully replicated.						
	Response: Structure retention strategy approved August 3, 2005 and included in OGR's signed by BRL August 9, 2005. Text revised.						
40.	General		Structure Retention	Structure Retention	Post-approval condition to address strategy and monitoring mechanism	Requires follow-up	Yes
	Issue/Comment: Plan lacks Structure Retention Protocols						
	Response: Structure retention strategy approved August 3, 2005 and included in OGR's signed by BRL August 9, 2005. Text revised.						
41.	Section 1.4	13	Timber Allocations	The community timber program is entitled to one half of one percent or 2,700 m ³ per year...	This needs to be tied to a final approved harvest level.	Requires follow-up	Yes
	Issue/Comment: BRL needs to recognize that the one half of one percent also includes a portion of the deciduous						
	Response: Text revised.						
42.	Section 6.2	228	Timber Allocations	Table 25	A quick update would address this.	Requires follow-up	Yes
	Issue/Comment: The table should clarify where allocations are limited to certain species.						

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	Response: Text revised.							
43.	Section 6.2	228	Timber Allocations	Table 25	Revise table to indicate correct source	Requires follow-up	Yes	
	Issue/Comment: Sources for W91 DTAs has been made clear in planning process. Sourced from "pure deciduous" stands							
	Response: Text revised.							
44.	TSA 4.2.12	4-30	Wildlife		This is definitely useful information. Recommend future plans address some species that have more specific habitat needs as part of addressing the "coarse filter approach" put forward in Section 1.1.	Requires follow-up	Yes	
	Issue/Comment: From recent workshops it is fairly evident that grizzlies are habitat generalists providing some preferred habitat types are available. The main constraint appears to be access.							
	Response: As per DFMP approval condition #5, BRL is committed to completing an analysis of the natural range of variability (NRV) to develop scientifically based targets for the future plans. Comments will be considered in future plans.							
45.	5.10.8	178	Wildlife	Grizzly Bear		Requires follow-up	Yes	
	Issue/Comment: The document provides some background on grizzly bear populations and research but there is no dialogue to show what the company is doing to incorporate this information into their harvest plans.							
	Response: Please refer to VOITs in DFMP text report.							
46.	TSA Section 4.0	4-3	AAC assumptions	Regen Lag: None applied	There should be some background information that supports this using the Regeneration Lag Assessment Protocols supplied by the department	Requires follow-up	Yes	
	Issue/Comment: There does not appear to be any discussion around regen lag and why one was not applied. If Blue Ridge did not feel one was warranted, why did they not apply the verification protocol on their regeneration data to confirm this?							
	Response: A regen lag sensitivity analysis was conducted in Section 5 of the DFMP TSA. Blue Ridge Lumber has a very aggressive silviculture track record. Furthermore, yield curves are empirical and do not address regen lag or potential increased growth rates that may occur. The regen lag is currently being verified with Blue Ridge Lumber's approved Growth & Yield Program. Regen lag will be further analyzed by Blue Ridge Lumber in their development of ARS standards.							
47.	Section 1.3.5	Page 1-4	AAC assumptions	marginally merchantable	In further conversation, Silvacom indicated that the 10.64 ha was probably due to sliver polygons that were previously identified as a cutblock but that they had not been included as part of the final sequence. The documentation should be cleaned up to reflect that the criteria for the calculation of marginal merchantability includes the absence of a cutblock (CUTBLOCK=0) and that there are 10.64 ha that were not classified as marginal merchantable due to the reasons listed above.	Editorial/ Comment	Yes	
	Issue/Comment: Following the criteria listed in this section, 653.68 ha of land that should have been classified as marginally merchantable. Silvacom indicated that the exclusions from classification as marginally merchantable were due to these stands being classified as cutblocks. Given this, still 10.64 ha were not identified as a cutblock.							
	Response: Text revised. The 10.64 ha was left uncorrected, however a note was included in the document highlighting this very small discrepancy.							
48.	Appendix A	A-15	AAC assumptions	Field No. 151 (CUTBLOCK)	Appendix A, Page A-15, Field No. 151 (CUTBLOCK) documentation needs to be updated to reflect the addition of the CUTBLOCK value of "4". Silvacom indicated that this was a small update identified by BRL after the final netdown.	Editorial/ Comment	Yes	
	Issue/Comment: Undocumented value in the "CUTBLOCK" field (value of "4").							
	Response: Text revised.							
49.	Section 1.3.8.2.7	Page 1-20	AAC assumptions	field "GIS40304" = 506277	Of note, these 4 polygons each have an area less than 0.0001 ha. This comment is one of process not of substance.	Editorial/ Comment	Yes	

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	<p>Issue/Comment: During review of this section it was noted that a sliver polygon, field "GIS40304" = 506277 had not been processed according to this section's rules. This polygon's "NEWHGT" value had been assigned the polygon's "U_AVG_HT" value even though the "OSTEMAVE" >= 400. The "O_AVG_HT" value should have been assigned to the "NEWHGT" field as per the rules. Silvacom advised that this sliver polygon along the boundary got tagged with the understory layer attributes and was not treated as part of the 2004 detailed conifer understory inventory as "US_AREA" was not "IN". As the remaining criteria in this section were reviewed the same occurrence was noted as well for 3 additional polygons, "GIS40304" values of 505302, 507059 & 507025. These polygons had the 2004 conifer inventory attribute data attached to them, although they were not included in the stands processed for the 2004 conifer inventory.</p> <p>Response: Due to the very very small area in question, no change was made to the approved net landbase. Text revised.</p>						
50.	Section 1.3.8.3.	Page 1-21	AAC assumptions	Effective height defined	The sentence "Effective height defined in section 2.3.8.2.7..." should be changed to "Effective height defined in section 1.3.8.2.7...".	Editorial/Comment	Yes
	<p>Issue/Comment: Wrong section number referenced</p> <p>Response: Text revised.</p>						
51.			AAC assumptions	Yield curves	These yield curves only represent ~3,000 ha of net landbase and appear to be reasonable	Editorial/Comment	Yes
	<p>Issue/Comment: No review was conducted on the re-calculation of the yield curve based on plot establishment date. Review was not conducted on yield curve 12 & 13.</p> <p>Response: Although no formal review was conducted, the yield curves were presented/discussed/determined in DFMP meetings and were deemed acceptable by SRD with the understanding that this was a 3,000 ha trial initiative.</p>						
52.		Page 2-24	AAC assumptions	Yield Curve Number 12.	The documentation should be cleaned up to show the value of "t"	Editorial/Comment	Yes
	<p>Issue/Comment: No value of the co-efficient "t" is provided in the documentation. From the mathematical calculation though it can be deduced the value of "t" for this curve was set at 0.</p> <p>Response: Text revised.</p>						
53.	6.2	226	Conifer Understorey	Third bulleted item on the page. Statements are made that the understory conifer in deciduous stands is "critical to maintaining the conifer cut"		Editorial/Comment	Yes
	<p>Issue/Comment: If the MWFP DTA was awarded based on the approved TSA, it is not clear that the "unidentified" understories that can not be seen or are accurately captured in the AVI inventory are really critical to maintaining the conifer cut. Suspect the TSA did NOT rely on these "unidentified" understory trees.</p> <p>Response: The understory conifer in deciduous stands is critical to maintaining incidental conifer volumes in pure deciduous stands. Text revised.</p>						
54.	Section 1.3.8.2.1.	Page 1-18	Conifer Understorey	Wording "If the height of the primary conifer layer was within 5 metres of the AVI overstorey height the stems/ha class was reset to 0."	The wording "If the height of the primary conifer layer was within 5 metres of the AVI overstorey height the stems/ha class was reset to 0." should be changed to "If the difference between the AVI overstorey height and the primary conifer layer height was less than 6 metres the stems/ha class was reset to 0.". This then implies the difference can be anywhere from +5 to -99 meters which accurately reflects their mathematical representation "If ((HEIGHT) - (O_AVG_HT))<= 5 then "OSTEMAVE = 0"". The comments above for section 1.3.8.2.1 also apply to sections 1.3.8.2.2, 1.3.8.2.4 & 1.3.8.2.5.	Editorial/Comment	Yes
	<p>Issue/Comment: The wording "If the height of the primary conifer layer was within 5 metres of the AVI overstorey height the stems/ha class was reset to 0." used implies that if the height difference was +/- 5 metres then the stems/ha was reset to 0. Their mathematical representation shows the height difference to be <= 5 meters. The mathematical calculation accurately reflects the way the analysis was done.</p> <p>Response: Text revised.</p>						

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55.	Section 6.6 Integration of Operations	234- 237	Embedded Operators	Entire section.	The focus needs to be on negotiation of these as part of ground rules.	Editorial/ Comment	Yes
	Issue/Comment: It is doubtful if the DTA / Quota holders would be in agreement with the conditions of the three scenarios. This section should be removed and discussed during ground rule negotiations.						
	Response: OGR's signed by BRL August 9, 2005.						
56.	Section 3.9	38	Future Forest	In addition, a dynamic assessment of forecasted conditions of the landscape at key points in time (e.g., 10, 20, 50, 100 and 200 years into the future)	An update of this information should be included as part of the document, especially in terms of sequencing.	Editorial/ Comment	Yes
	Issue/Comment: Considering the amount of work that has been completed to date, why has this not been presented as part of the DFMP. This may prove to one of the more critical elements in landscape planning.						
	Response: Text revised.						
57.	DFMP Text	272	Future Forest	Conservation of Biological diversity		Editorial/ Comment	Yes
	Issue/Comment: This section is vague. Looking for some specific measures that the company did to ensure biological diversity						
	Response: Text revised in Section 1.1, re: DFMP approval condition #5.						
58.	Section 1	Pg 5	Future Forest	Introduction - Ecosystem Management	Work towards defining NRV and setting specific objectives that maintain these values according to the less broader objectives set in this plan. Work towards this task for next DFMP	Editorial/ Comment	Yes
	Issue/Comment: Approach favoured by BRL is the "maintaining natural disturbance regimes", yet the document does not define the accompanying patterns of forest composition and patch size as being within the "range of natural variability"						
	Response: Text revised in Section 1.1, re: DFMP approval condition #5.						
59.	5.4.12	108	Genetic Policy	Genetic Tree Improvement	measurement and analysis of pine progeny trials is required to substantiate genetic gain for Region C orchard seed; progeny tests need to be established in order to substantiate gains for Region D white spruce orchard seed	Editorial/ Comment	Yes
	Issue/Comment: gain for improved Region C lodgepole pine and D white spruce seed is not substantiated (paragraph 5)						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
60.	Section 5.12		Grazing	Grazing		Editorial/ Comment	Yes
	Issue/Comment: The description of an AUM is not entirely accurate as an AUM is based on a 1000 pound cow/calf pair of which there are few 1000 pound cows these days. A bull is rated at 1.5 AUM's.						
	Response: Corrected November 22, 2004 with comments from Joel Politesski and presented at December 1, 2004 DFMP meeting. Text revised.						
61.	Section 5.12		Grazing	Grazing		Editorial/ Comment	Yes
	Issue/Comment: The table of dispositions is not up to date or accurate in spots. FGL 000006 is only 4.7 hectares in size, not 129.24 based on records and FGL 910004 no longer exists as it was amalgamated with FGL 900015.						

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Response: Corrected November 22, 2004 with comments from Joel Politesski and presented at December 1, 2004 DFMP meeting. Text revised.							
62.	TSA Section 4.0		Harvest Sequence		Recommend sensitivity analysis targeted for operational delivery.	Editorial/Comment	Yes
	Issue/Comment: There does not appear to be any sensitivity analysis in terms of the ability to harvest the smaller (1 ha. and greater), more dispersed stands sequenced for harvest. There is some question as to the desire to harvest these stands especially in terms of the higher roading costs versus harvesting opportunity.						
	Response: Incorporated as part of the operationalized SHS in the 2005 PFMS.						
63.	5.4.7	98	Herbicide	"Wildlife and biodiversity considerations" 2nd paragraph notes that the herbicide monitor plots are indicating no significant difference in species richness..."		Editorial/Comment	Yes
	Issue/Comment: Monitor plot program was not scientifically valid (commissioned report by Phil Comeau- UofA) and that this statement can not be made. Furthermore, if this statement has data/report to back it up, it should be cited here. Note also that the sentence prior says that the plots are "providing preliminary trend information" then the next sentence notes the "significant differences"						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
64.	Section 5.4.7 Vegetation Management	98	Herbicide	These plots are indicating that there is no significant difference in species richness between treated and untreated portions of the monitor plot three to four years after treatment	This comment should be contextualized in terms of the frequency of treatments to portray a reasonable expectation	Editorial/Comment	Yes
	Issue/Comment: This statement should be put in context. When the program was first started most companies were focused on their first treatment. Now companies are returning to blocks for multiple treatments						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
65.	5.4.7	91	Herbicide	Vegetation Management		Editorial/Comment	Yes
	Issue/Comment: Concern with using herbicides to create Snags, additional snags need to be present throughout the life of the cutblock not just for the first few years.						
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.						
66.	6.3	229	Incidental Conifer	Section deals with both understorey conifer (as in the title) but the final paragraph in the section dealing with the FMA items discusses the issue of "incidental" conifer.		Editorial/Comment	Yes
	Issue/Comment: 'incidental' conifer is different from understories. Incidental is usually seen as that conifer volume that is harvested from deciduous stands (I.e. is merchantable at the time of harvest). Understorey trees are not typically seen as 'incidental'. Note that in section 6.5 the incidental replacement strategy is detailed, and the 'incidental' conifer produces "volume" (i.e. is cut and goes to BRL) and the volume produced sets the area needed to be reforested to ensure sustainability of this "incidental" conifer. Note understories don't figure in section 6.5 see this blurring of incidental and understorey types as providing BRL with an additional "case" for maximal protection of understories even where normally not have rights, and/or the TSA would not account for understories. Understories are not considered as incidental conifer volume!						
	Response: Incidental Replacement Strategy approved August 3, 2005. Text revised.						

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67.	2	28	Misc.	Itemized list of "unresolved issues that may effect future management planning"		Editorial/Comment	Yes
	<p>Issue/Comment: It's hard to see how this list provides any value and in fact the list includes "Natural gas and electricity prices" -- not sure how this is unresolved. Also why is ARIS listed, how is the Noxious Weed Policy unresolved, what of the EFM Policy? If this list is a 'needs' list, one would need substantially more information in order to 'act' on the 'unresolved' issues</p> <p>Response: Text revised.</p>						
68.	DFMP Text	17	Misc.	Adaptive management		Editorial/Comment	Yes
	<p>Issue/Comment: BRL suggests it will incorporate many of the concepts presented in an array of national and provincial documents through an adaptive ecosystem management process. Throughout the rest of the document the company fails to show that such a process has been engaged.</p> <p>Response: Text revised.</p>						
69.	3.2.3	9	Misc.	Protected areas		Editorial/Comment	Yes
	<p>Issue/Comment: This statement that they will establish protected areas and in 3.1.5 BRL states no protected areas were established in the FMA should be reconciled.</p> <p>Response: Text revised.</p>						
70.	5.9.12	157	Misc.	Fire Assessment Project	Correct typo.	Editorial/Comment	Yes
	<p>Issue/Comment: Typo in second paragraph of referenced page. Should read "wildfire" not "wildlife"</p> <p>Response: Text revised.</p>						
71.	Section 5.7 Rare and Endangered Plants	124	OGRs		Seek feedback from the company.	Editorial/Comment	Yes
	<p>Issue/Comment: Some effort has been placed in identifying these species. What efforts are being utilized to protect or maintain these species/sites</p> <p>Response: OGR's signed by BRL August 9, 2005. Text revised.</p>						
72.	Section 8.1 Timber Harvest Planning and Operating Guidelines	249 - 252	OGRs	Table 30 "Core" and "FMA Specific" Ground Rules - B 4.1 Block Design and D 1.0 Woody Debris Management	The company should recognize that these ground rules are core and if changes are desired, that they should be brought to the ground rules review committee.	Editorial/Comment	Yes
	<p>Issue/Comment: The only non-core ground rules identified at the end of the Woodlands/Yellowhead Zone Ground Rules development process were B 2.7 Domestic Grazing and D 7.0 Structure Retention and Understorey Protection. The addition of Block Design and Woody Debris Management to the list was done after the core package of ground rules had been adopted by the group as a whole. For BRL to open up these ground rules outside the regular ground rules review process is very counterproductive.</p> <p>Response: OGR's signed by BRL August 9, 2005.</p>						
73.	DFMP Text	100	OGRs	Permanent streams usually have 20 to 30m of standing timber or brush remaining after harvesting		Editorial/Comment	Yes

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	<p>Issue/Comment: This should of course be 30 m always as a minimum. Concern over retention of OGR buffers. Should be viewed as minimums.</p> <p>Response: Text revised.</p>						
74.	Section 2.6	22	Public Involvement		This should be emphasized within the document	Editorial/Comment	Yes
	<p>Issue/Comment: Need to recognize an innovative PAC that involves 4 different forest companies</p> <p>Response: Text revised.</p>						
75.	Section 5.17 Aesthetics	208	Public Involvement	There has been very little aesthetic concern by the public to date, probably due to our relatively flat...	There should be some acknowledgement of what is occurring in Swan Hills.	Editorial/Comment	Yes
	<p>Issue/Comment: The genesis of the Swan Hills Forest Communication Group came out of a concern for logging. Most of the concerns come back to aesthetics. This key point has been left out of this discussion. The issues are still being discussed with no major resolutions to the aesthetics issues having been reached yet.</p> <p>Response: Text revised.</p>						
76.	Section 5.17 Aesthetics	208	Public Involvement	BRL has however incorporated aesthetic concerns into our AOP and GDP planning. Examples include...	There needs to be an acceptance between SRD and the company as to what areas are a priority for aesthetic management and to what degree they will be managed. This will promote better management and minimize ad hoc solutions.	Editorial/Comment	Yes
	<p>Issue/Comment: Some areas of recent focus should be mentioned such as the Freeman River campground and the community of Swan Hills. This list will continue to evolve with effective public participation.</p> <p>Response: Text revised.</p>						
77.	5	82	Regen Standards	Paragraphs 4 and 5 discuss use of Fir in reforestation.		Editorial/Comment	Yes
	<p>Issue/Comment: Paragraph 4 notes that the company will utilize fir where it existed prior to harvest (as per directive 2001-01) and that it will be considered as an acceptable species "up to 10% on each cutblock". However, paragraph 5 notes quotes the Directive that "no restrictions on the proportion of fir stocking"...which does not line up with the statement that only 10% will be used. Also noted on page 83 in bullet list that 10% cap will be used for fir</p> <p>Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.</p>						
78.	5.4.7	91	Regen Standards	Veg management section. Opening sentence notes that the Regen standards are the reason why they need for vegetation management		Editorial/Comment	Yes
	<p>Issue/Comment: The complaint about the 2000 Standards making them do veg management is then followed by the 3rd and 4th paragraphs that note without veg management they yields would be 1/2 of the projected yield. Not sure why the opening complaint about the standards?</p> <p>Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.</p>						
79.	5.4.8	103	Silviculture	Spacing and cleaning section, last sentence, first paragraph notes that "a review of the literature reveals that merchantable sawlog volume can be increased by 40-70% by spacing and thinning"		Editorial/Comment	Yes
	<p>Issue/Comment: Gain a citation of the source of this review would be nice, but more importantly the values cited 40-70% range by a factor of nearly 100% and its not clear what factors effect what level of volume increase you'd get.</p>						

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Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.								
80.	5	83	Silviculture Table	Use of natural regeneration except white spruce, mixedwood and high productive pine sites		Editorial/Comment	Yes	
	Issue/Comment: While use of natural regeneration may be a realistic goal for drag scarify pine, I'm not convinced spruce site would be meaningfully left to natural regen. I'm also curious as to why high site pine is planted given that some "will not regenerate satisfactorily by natural means". Why only high-site pine will not regenerate adequately...what is it about high site pine that is the problem not encountered elsewhere.							
	Response: Corrections presented in January 24, 2005 DFMP meeting. Text revised.							
81.	DFMP Text	274	Stewardship Reporting	Land deletions		Editorial/Comment	Yes	
	Issue/Comment: Need regular reporting							
	Response: See VOITs.							
82.	Section 6.2 Current Timber Allocation	227	Timber Allocations	Miscellaneous Timber Use for 0.5% of coniferous AA in W2, W3 and W4.	Deciduous CTP rights need to be acknowledged as part of the plan.	Editorial/Comment	Yes	
	Issue/Comment: The Community Timber Program has rights to 0.5% deciduous in these 3 units as well as per Section 8(2) of the Forest Management Agreement.							
	Response: Text revised.							
83.	Section 6.2 Current Timber Allocation	227	Timber Allocations	BRL has the rights to all coniferous timber within the FMA area.	Clarification is required	Editorial/Comment	Yes	
	Issue/Comment: Mostowich Lumber also has conifer rights via a fixed volume quota which is currently allocated as part of VSA 1.							
	Response: Text revised.							
84.	General		Wildlife			Editorial/Comment	Yes	
	Issue/Comment: Lack of incorporation of Wildlife research results into forest planning.							
	Response: Text revised.							
85.	DFMP Text	39	Wildlife	Variables required for wildlife habitat is debris, snags and regen	Suggests that BRL attention to this topic is marginal	Editorial/Comment	Yes	
	Issue/Comment: Suggests that BRL's attention to this topic is marginal.							
	Response: Text revised.							
86.	5.10.6	175	Wildlife	Northern Moose Management Program.		Editorial/Comment	Yes	

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	<p>Issue/Comment: Logging may have potential benefits for moose in increasing browse in the short term, However many other considerations come into play such as the quality of access road into or near the cutblock, the configuration of the cutblock with respect to sight distances, and distances to escape cover, the amount of standing structure left, and the effectiveness of herbicide programs. 400 m from any point in the cutblock to cover was a minimum sight distance used many years ago; most progressive forest companies allow for much more reasonable sight distances through creative use of remnant structure.</p> <p>Response: OGR's signed by BRL August 9, 2005.</p>						
87.	5.10.6	175	Wildlife	Wildlife Referral Map and guidelines		Editorial/Comment	Yes
	<p>Issue/Comment: At this level of management the scale of the Referral Map is too large. Each cutblock should be designed with wildlife considerations in the design. Can not say that because a block does not fall within the referral guidelines that we can dismiss it. Where the block does falls within the referral guidelines particular attention must be paid to ungulate management in addition to other wildlife guilds.</p> <p>Response: Text revised.</p>						
88.	5.10.7	176	Wildlife	Hunting		Editorial/Comment	Yes
	<p>Issue/Comment: Certainly there is more current hunting information available than 1995</p> <p>Response: More recent information does not appear to be available.</p>						
89.	5.10.11	180	Wildlife	Trumpeter swans		Editorial/Comment	Yes
	<p>Issue/Comment: The information on trumpeter swans is good and the company commits to incorporating the F&W guidelines into their harvest plans.</p> <p>Response: Text revised.</p>						
90.	Appendix 14		Wildlife	Mammals in the BRL FMA		Editorial/Comment	Yes
	<p>Issue/Comment: Little to show how BRL will modify logging or reforestation to consider these individual species of the guilds to which they belong.</p> <p>Response: Text revised.</p>						