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File No. 3893.10

August 6, 2021

Todd Yakielashek  
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Box 998, 558 3rd Avenue S.  
Swan River, MB R0L IZ0  
[Todd.Yakielashek@lpcorp.com](mailto:Todd.Yakielashek@lpcorp.com)

Dear Todd Yakielashek:

**RE: Louisiana-Pacific Canada Ltd. 20-Year Forest Management Plan –  
Information Request No. 1**

The Environmental Approvals Branch and Forestry and Peatlands Branch have reviewed the Technical Advisory Committee comments received related to the Louisiana-Pacific Canada Ltd. 20-Year Forest Management Plan (FMP) for Forest Management Licence Area No. 3.

Revisions to the plan are required to address the comments. Please revise the FMP in accordance with the comments in the attached table. Additionally, a written response with reasoning for not including any requested changes is required.

The regulatory review of the FMP will continue upon receipt of the revised FMP.

If you have any questions regarding this matter, please contact me at [Elise.Dagdick@gov.mb.ca](mailto:Elise.Dagdick@gov.mb.ca) or Marianne Porteous, A/ Industry Services Forester, Forestry and Peatlands Branch at [Marianne.Porteous@gov.mb.ca](mailto:Marianne.Porteous@gov.mb.ca).

Sincerely,

Original Signed By:

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Elise Dagdick  
Environment Officer

cc Marianne Porteous, Michael Doig, and Matt Conrod – Forestry and Peatlands Branch  
Public registries

## Technical Advisory Committee Comments

TAC Member	FMP Section	Comment
Forestry and Peatlands	8.3.7.2 Analysis of Potential Effects Pages 37 to 39.	Formatting issue: The cumulative effects framework for biodiversity is shown in _____ (the sentence continues a few pages later).
	Section 8.4: Visual Quality.	While there is mention of trying to keep roads to contour lines, there is no mention of harvest shapes trying something similar.
Manitoba Infrastructure		The Region asks the applicant, that if tree removal is required adjacent to the highway right-of-way, that a buffer of trees the width of the controlled area be left in place to obstruct the view from the work area, keep wildlife from view and reduce the distraction to the travelling public.
Parks and Protected Spaces		The plan needs to be updated to use the appropriate language regarding land use categories and not zones.
		There are numerous table cross references that don't line up.
		Clearly state that operations are prohibited in the protected land use categories and ecological reserves
		In Chapter 8 there should be reference to how operations plan to mitigate impacts to the protected land use categories and ecological reserves from harvest and Silviculture activities as well as identify any impacts to park users and how they will be mitigated. Users are not limited to the campgrounds.
		P2 Are the FMU boundaries in green? And do those boundaries overlap with FML 3? If possible, please clarify the boundaries. Are the red/orange lines roads?
		P175 3.77? 3.79? And, new paragraph?
		P175 I believe the area is in the Metis Harvest Zone. Needs to be confirmed and if so referenced.
		P175 This really needs more information. How can we be sure of any Impacts to Indigenous Rights or cultural values in the Provincial Park?
		P178 Table 3.41?
		P178 Could not cross reference the park and protected area numbers for FMU 10 or 11. Which parks/protected areas fall in FMU 10 and 11? P178 This whole table is confusing.

## Technical Advisory Committee Comments

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		<p>Parts of Duck Mountain Provincial Park are protected area based on the land use category. The table is confusing as it treats provincial parks and protected areas as separate. Could change headers to be:</p> <ul style="list-style-type: none"> <li>• Provincial Park Area (unprotected LUCs)</li> <li>• Provincial Park Area (protected LUCs)</li> </ul> <p>Ecological Reserves are missing.</p> <p>It needs to be clearly stated whether provincial parks are being double counted as part of the provincial forest layer.</p>
		P178 Land Use Categories is the accurate and legal term - not "classes" or "zones" (p. 195). Document needs to be consistent with the park management plan and legislation.
		P178 According to the Park Management Plan, RD is 8,750 ha.
		P178 These objectives should be stated. It leaves the reader questioning.
		P179 3.81?
		P185 The figure numbers do not match for the remainder of the document.
		P195 Update using latest information. The park recently changed the LUC in the Line Lake area and LP was part of those discussions. Also remove language on "zones" and use the appropriate LUC.
		P195 Replace with the appropriate land use categories. These are legal definitions and classifications within the park system and should be used.
		P195 <del>The Kettle Stones Provincial Park</del> [Strikethrough text]
		P196 <del>The Springwater Provincial Park</del> [Strikethrough text]
		P196 <del>The Swan River Provincial Park</del> [Strikethrough text]
		P196 <del>The Cowan Bog Ecological Reserve</del> [Strikethrough text]
Protected Areas Initiative	Ch 3 Pt 2	Recommend the numbers assigned to figures and those referenced in brackets in text be double-checked throughout document. They do not all match up, for example - Figures 3.19-3.21
Protected Areas Initiative	General Comments	<p>Recommend that the LP 20 year Plan:</p> <ol style="list-style-type: none"> <li>1. Reference Manitoba's network of protected and conserved areas (previously known as the network of protected areas), and include definitions of the types of sites included in the network - protected areas and other effective area-based conservation measures (OECMs). The Plan</li> </ol>

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		<p>references protected areas in multiple chapters, but they are not identified at any point in the Plan or in the appendices. In chapter 3, section 3.1 the first paragraph requires a description of protected areas be included in the plan.</p> <p>The Branch recommends adding OECMs to the plan, because they may be identified within the FMLA over the course of the 20-year plan. More information on OECMs is available in the appendices in Canada's One With Nature report, available on the Conservation 2020 website: <a href="https://www.conservation2020canada.ca/resources">https://www.conservation2020canada.ca/resources</a>. PAI staff can assist with wording if required.</p> <p>Official protected area and OECM definitions - FYI:  A protected area is a clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values. Indigenous rights are respected in protected areas which generally remain available for hunting, trapping, fishing, and other traditional practices.</p> <p>Protected areas in Manitoba include land, freshwater, or marine areas where logging, mining, hydroelectric development, oil and gas development, exploring for and harvesting peat, and other activities that significantly and adversely affect habitat are legally prohibited.</p> <p>An other effective area-based conservation measure, or OECM is a geographically defined area other than a protected area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, cultural, spiritual, socio-economic, and other locally relevant values. While protected areas have biodiversity conservation as a primary objective, OECMs result in biodiversity conservation regardless of the reason for its existence.</p> <p>2. Clearly state that LP cannot operate in protected areas/OECMs as part of license.</p>

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		<p>3. Include a map of protected and conserved areas in the FMLA in the Plan. Please contact Jenny Harms at <a href="mailto:jenny.harms@gov.mb.ca">jenny.harms@gov.mb.ca</a> for the latest protected and conserved areas dataset.</p>
	<p>Section 3.1.3.2 Enduring Features Description:</p>	<ul style="list-style-type: none"> <li>• Much of the information in this section appears to come from an older version of the Conservation and Climate Protected Areas Initiative website. Please reference the website in the list of citations for this chapter.</li> <li>• This section describes enduring features, but does not relate them to the protected and conserved areas network as required by the Draft Guidelines. The Branch has recommended wording in the PDF to help clarify. Consider referencing the final location of the protected and conserved areas definitions/requirements in this section as well.</li> </ul>
	<p>Section 3.3.3 Crown and Private Lands</p>	<ul style="list-style-type: none"> <li>• Table 3.4.1 is confusing as presented. Please note that the Crown lands are not listed by major category, but by legal designation under various provincial Acts. Recommend language be changed to reflect that.</li> <li>• Also, consider including the complete area for each designation type (provincial forest, provincial park, community pastures, wildlife management areas) and the undesignated Crown lands which is shown as Ag Crown area in the table. Please see recommended language in the attached chapter document.</li> </ul>
	<p>1.3.2. “in some cases to address values that are like those held for protected areas.”</p>	<p>Please remove the phrase: “. . . in some cases to address values that are like those held for protected areas”. This statement is inconsistent with international guidance on protected areas provided by the IUCN, and pan-Canadian guidance on protected areas. If there is a desire to include an additional phrase, could change it as follows: “in some cases to address values that are like those held for <b>conservation</b> areas.”</p>
	<p>1.3.3 “It will also forestry related risks from climate variability and extreme events.”</p>	<p>It appears a word is missing here.</p>
	<p>2.3.1. “• cultural features or other protected areas”</p>	<p>Please note: if this is referencing protected areas included in Manitoba's protected and conserved areas network, consider putting it into it's own line. There are</p>

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		<p>specific international standards that must be met for a site to be reported as a protected area. Cultural features may not necessarily meet the standards. Please note this same line is also in FMP Ch6 APP4 Forest Roads and Management Structures SOG (p.6). Because protected areas are not defined anywhere in the plan, the intent of this wording is unclear. Recommend adding definition and clarifying information.</p>
	<p>3.1.3.2. “• Baldy Mountain – highest elevation in Manitoba”</p>	<p>Please note that Baldy Mountain does not technically stand out as a significant enduring feature within the ecoregion. It looks like it has been selected as significant because of its elevation - which could make it a significant landform. Consider rewriting this as a paragraph noting the first two as significant enduring features, and also noting Baldy Mtn as highest elevation in MB.</p>
	<p>3.1.3.2. “The Protected Areas Initiative routinely conducted a gap analysis to evaluate representation with regards to protected areas planning on a regional basis. The representation map of Manitoba's enduring features gives an indication of where Manitoba's enduring features are adequately, moderately, partially, and not represented.”</p>	<p>Consider rewording this paragraph for clarify: "The Protected Areas Initiative routinely conducted a gap analysis to evaluate representation of <i>biodiversity in Manitoba's network of protected and conserved areas</i>, and with regard to protected areas planning on an ecoregional basis."</p>
	<p>3.1.3.2. “Although there is still work to be done before the network of protected areas within Manitoba is complete, the Protected Areas Initiative has made significant progress towards the goal of representing the biodiversity across Manitoba.”</p>	<p>It is neither appropriate nor a requirement for the Plan to note what the past priority of government is for protected areas. Delete this paragraph.</p>

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	<p>3.1.3.2.            “Note that the Duck Mountain Provincial Forest and Duck Mountain Provincial Park receive Parks Branch highest rating ‘Adequately Captured’, similar to Riding Mountain National Park. The portion of FML #3 outside the Duck Mountain is ranked as ‘Partially Captured’, ‘Not Captured’, and ‘Moderately Captured’.”</p>	<p>Assessing representation is not about "highest rating", but whether biodiversity is assessed as adequately represented in the network. Also note that the criteria for assessing representation may change in future, based on emerging science. Recommend simplifying this paragraph to something like this:            Note that Duck Mountain Provincial Forest and Duck Mountain Provincial Park are adequately represented in the network of protected and conserved areas, while portions of FML #3 outside the Duck Mountain are moderately or partially represented, or not captured in the network.</p>
	<p>Figure 3.79</p>	<p>Recommend confirming the appropriate naming convention for First Nations Lands included in Figure 3.79. Unclear whether "First Nation Pending" or "TLE-acquired Lands" areas should be included in public mapping. Also, if the process for TLE-acquired lands listed here has been completed, would they now be First Nations lands?</p>
	<p>3.3.3.            “3.3.3. Crown and Private Lands”</p>	<p>Consider changing this heading to reflect wording in the table - "Crown, Private, and First Nation Lands".</p>
	<p>3.3.3</p>	<p>Recommend using same convention for "Crown" lands throughout document. Capitalize 'C'.</p>
	<p>3.3.3.            “FMUs 10 and 11 have a combination of Crown and private lands, with FMU 10 being primarily private land (Table 3.39). FMU 13 contains both the Duck Mountain Provincial Forest and Duck Mountain Provincial Park, and is all Crown land.”</p>	<p>Table 3.40?</p>
	<p>3.3.3.</p>	<p>Table 3.41?</p>

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	<p>“The Crown lands in FMUs 10 and 11 have many different categories. Table 3.40 summarizes of the major categories in FMU’s 10 and 11”.</p>	
	<p>Table 3.41</p>	<p>Please note the areas reported in this table are not for major categories, but for undesignated Crown lands and for Crown lands legally designated under various provincial Acts. Consider renaming table as "Crown Land Designations", or something that recognizes the binding nature of management for these areas. The heading for "Ag Crown Area" column could be changed to "Undesignated Crown Land" or a note could be added explaining what Ag Crown Area is.</p>
	<p>Table 3.41            “***Kettle Stones area is classified by the Province as both park and protected area”</p>	<p>This triple-asterisk point is not included in any of the columns in the header row of either of the tables (3.40 or 3.41). Consider deleting as per Parks and Protected Spaces Branch comments.</p> <p>Consider including all protected area hectares in the protected areas column for each FMU. The asterisk could read something like: "Protected areas in the FMLA include ecological reserves, parts or all of some provincial parks and wildlife management areas, and some conservation trust owned lands. This area is also shown in the provincial park and WMA columns o the table."</p> <p>Conversely, the provincial parks and wildlife management area columns could say unprotected parts of provincial parks and wildlife management areas. This would eliminate the need for the Alonsa/Cayer and Kettle Stones notes.</p>
	<p>3.3.3.            “In Agro-Manitoba, Crown lands have been assigned operational land use codes intended to guide the type(s) of land use and development allowed on a given parcel of Crown land.”</p>	<p>Consider rewording:            "In Agro-Manitoba, Crown lands have been assigned operational land use codes intended to guide the type(s) of land use and development allowed on a given parcel of <i>undesignated</i> Crown land."</p>



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	<p>4.6.2.                      “Recreation opportunities in unharvested areas can be provided by leave areas, buffers, mature and old forest purposefully left unharvested, as well as reserves set aside such as parks and protected areas.”</p>	<p>Note: parks and protected areas are not 'reserves' or 'set asides'. Recommend alternative wording such as: ". . . left unharvested, and areas designated for other purposes including provincial parks, protected areas, and other designated Crown lands."</p>
<p>Wildlife and Fisheries Branch</p>		<p>- More details are required for existing bird monitoring programs within the FML that have been conducted by or supported by LP.</p>
		<p>- More details are required for the bird indicator species assessments used in the scenario planning and rankings, and carried forward into the five-year reports.</p>
		<p>- Additional details are still required in all sections addressing moose winter and summer habitat. Summer habitat assessments should also be included in both the scenario ranking and five-year report sections.</p>
		<p>- Commitments to data collection and analyses are still required. All monitoring sections should contain triggers for adaptation, and details on what actions may be taken to reverse any negative projections (if/where possible).</p>
		<p>○ No details or commitments are made by LP regarding how moose and elk data will be collected, obtained, and provided to the consultant for the proposed RSPF project. Nor are there timelines on when during the life of this plan it will be conducted and incorporated into future assessments and reports.</p>
		<p>○ The plan should commit to collecting additional bird species at risk information to develop probability of occupancy models for inclusion in future assessments and reports.</p>

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		<ul style="list-style-type: none"> <li>○ Road decommissioning should not only be tracked, but monitored to ensure that decommissioning is successful. If closures are not successful, then methods should be improved moving forward.</li> </ul>
	3.1.10	<p>The Branch previously requested that a summary of Louisiana-Pacific’s long-term bird monitoring program and the Ducks Unlimited Pasquia Project be included in the Ecological and Biophysical Section. This data should have been analyzed and summarized for inclusion into the Forest Management Plan to support the original program objectives and guide future operations. Statements like the following indicate the importance of this information to forest management planning:</p> <p><b>“3.1.10.6 - We look forward to the completion of the analysis of the survey data to address knowledge gaps related to waterbirds and their habitat in the Duck Mountain, that will enable LP to assess the effectiveness of current forest management strategies related to wetlands and waterbird habitat, and ensure continued availability of wetland habitat into the future”.</b> We recognize that some bird data was use to model habitat for the 17 bird indicator species, however no other analysis or summary of these programs is provided.</p>
	3.1.10.9 <u>Golden-winged Warbler</u>	<p>We appreciate that descriptions of golden-winged warbler and other focal bird species at risk were added to the document, but this section still fails to recognize that critical habitat has been defined for this species under the federal Species at Risk Act, including critical habitat squares located within FML 3. It should also mention that best management practices have also been published to assist forestry and other industry protect, maintain, and create habitat for this species. This information was previously shared with Louisiana-Pacific.</p>
	<u>5.6.4.2 Indicator Bird Species Table 5.10</u> & <u>5.7.4.2 Indicator Bird Species Table 5.13</u>	<p>The Branch previously requested that details be provided on what triggers a “positive”, “negative”, “slightly positive”, etc. classification. The coefficients and p-values or other statistic used to infer significant change should be provided with the classification in these columns. We appreciate that some descriptions of what qualifies as change has been added, and modeling outputs for individual variables has been pasted into the appendices, but this still does not provide a complete summary, and explain what thresholds exist between certain classifications, eg. between neutral, slightly positive, and positive.</p>

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		<p>A column summarizing the area (hectare or % of landscape) lost or gained within each “Probability of Habitat Occupancy” category would also be useful, similar to what is provided for moose and marten.</p> <p>The Branch also pointed out the following discrepancies and requested that further explanation be provided on why negative change should be considered acceptable, which does not appear to have been added to either of these sections or section 5.8.</p> <p><b><u>Previous comments:</u></b> Some of the bird maps in the appendix, and specifically the Probability of Habitat Occupancy graphs at the base of each page, differ from some of “Estimated Response” listed in the tables. A few examples where the graph and the information summarised in Tables 5.10 &amp; 5.13 (and in the combined 5.18) do not appear to match include:</p> <p><b><u>Common Yellowthroat (surrogate for Olive-sided Flycatcher)</u></b> The tables indicate that the Estimated Response for this species is slightly positive for No Harvest and Moose Emphasis and neutral for Baseline scenarios. The maps, and the accompanying graph summarising the Probability of Habitat Occupancy indicate that the Moose Emphasis and Baseline scenarios will have similar impacts on this species.</p> <p><b><u>Black-capped Chickadee</u></b> The tables indicate that No Harvest and Moose Emphasis scenarios are slightly positive and Baseline is neutral. The Probability of Habitat Occupancy graphs suggest that the Baseline scenario has higher levels of high quality habitat (51-75% and 76-100% occurrence) after 40 years than the other two scenarios.</p> <p><b><u>Blue-headed Vireo</u></b> There was an observation in the Blue-headed Vireo account summary in the Manitoba Breeding Bird Atlas that this species is seldom detected near roads. Although the overall estimated response for this species is “negative”, the reduction in roads the selected model could be used to temper the negative decline in habitat,</p>

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TAC Member	FMP Section	Comment
		<p>if roads were not included in the probability of occupancy assessment (see comments about explaining negative change below).</p> <p><u>Brown-headed Cowbird</u> Moose Emphasis and Baseline scenarios are very similar at the higher levels of habitat occupancy (&gt;25%), only differing at no habitat and lower probability (&lt;25%), yet Moose Emphasis is neutral and Baseline is positive.</p> <p><u>Red-eyed Vireo</u> The values in the Probability of Occurrence graphs for all the scenarios appear very similar, yet the estimated response in No Harvest and Moose Emphasis scenarios are slightly positive and the Baseline is neutral.</p> <p><u>Golden-winged Warbler (surrogate by American Redstart and Veery)</u> All scenarios are neutral or positive for AMRE and VEER, however true positive management to benefit GWWA would be at the operations level rather than the plan level.</p> <p>There will always be concern with negative change (depending on if significant or not, as questioned above). <b><u>This report should contain an assessment of the change, and rational as to why negative change and loss of that habitat niche is acceptable (e.g. correcting to NRV, the particular habitat niche is common, covering large areas in the Ducks compared to other ecosystems).</u></b> Both harvest scenarios will have a negative impact on species associated with old growth stands (e.g. Blue-headed Vireo, Winter Wren, Boreal Chickadee, etc). Many of these species are sensitive to forest fragmentation, and in general, long-term Breeding Bird Survey trends for these species appear to be stable or positive. Despite the negative response, it is beneficial to retain some tracts of old growth forest as breeding refugia for these species, so statistics on these habitat components could be provided in the section (e.g. assurance that the FMP is not eliminating all “old” stands from FML).</p>
	<p><u>5.6.4.3 Winter Moose Habitat Figure 5.33 &amp; 5.7.4.3 Winter Moose Habitat Figure 5.46</u></p>	<p>Why were the values of 0.0 – 0.2 added back into the winter moose habitat histogram, which now negates the ability to observe change in the 0.7- 0.9 range?</p>

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		<p>The Branch agreed with them not being shown on the original histogram due to such high areas values of 0.0 - 0.2 overwhelming the graph.</p> <p>We previously requested that text or a table be added to show the area (ha) decrease in low quality habitat values to compliment the apparent conversion or increase in higher quality values that is shown across the board in the histogram. This need is further emphasized if the higher quality values can not be observed or measured in the new histograms. A similar table has been added to the monitoring chapter, but should be added to these chapters as well, with area projection of the 40 year period (opposed to only year 20 needed for the 5-year reports).</p>
	<p><u>5.6.6.4 Summer Moose Habitat</u> <u>5.7.6.4 Summer Moose Habitat</u></p>	<p>Similar to winter moose habitat, a table showing the hectare change within each category over time would be useful, and should be incorporated in to section 5.8 when making comparisons between the two scenarios</p>
	<p><u>5.8.3 Objective Comparison by Scenario</u></p>	<p>As previously mentioned, this section does not include a comparison for summer moose habitat. This should be included.</p>
	<p><u>Chapter 7</u></p>	<p>The Branch still believes that commitments to data collection and analysis are still required prior to final approval of the FMP. We recognize that a detailed moose and elk habitat modelling approach is added in the appendices, however this is only a proposal from a consultant to Louisiana-Pacific and the Province of Manitoba. No details and commitments are made regarding how data will be collected, obtained, and provided to the consultant for analysis, nor are there timelines on when during the life of this plan it will be conducted, and during which 5-year period the model will be compared to harvest and incorporated into future reports.</p> <p>We reiterate that much of what is proposed for monitoring is just re-running habitat projections with updated forest harvest information. This is an important first step, however the plan still needs to acknowledge that these are projections, and the monitoring program should make an attempt to validate them. e.g.) The FMP projects that summer moose habitat will increase based on the HSM, but there is no proposed monitoring that addresses 1) the projected “ideal moose habitat” is actually being created, 2) if moose are actually using the ideal habitat, and 3) if they aren’t using the ideal habitat, then why not, and does the model need to be adapted? What are the triggers for adaptation, and what actions will be taken to reverse any negative projections (where possible)?</p>

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	<u>7.2.7 Road Decommissioning</u>	The Branch originally requested more details on the monitoring process. The effectiveness of road decommissioning should be monitored as part of this plan. We suggest that Louisiana-Pacific assess the continued use of closed roads at the end of September each year for a period of 5 years to judge the effectiveness of road closure and decommissioning methods. If current methods are not working, then they should be adapted.
	<u>7.3 Five-year Report FMP Monitoring</u>	We reiterate that overall, the wildlife components in this section do not explain what data will be analyzed and reported. Will all focal wildlife species habitat be remodeled with the actual 5-year harvest and compared against what is projected now (which as has been noted throughout the process, could be only ~50%)? It should also contain details on how this will be conducted.
	<u>7.3.3 Bird Species at Risk</u> <u>7.3.4 Indicator Bird Species</u>	Both bird sections only explain that the models will be updated if additional information becomes available. It is acknowledged that this may happen following continued species at risk surveys, however there is no indication the long-term bird monitoring program which collected data for the indicator species models will be continued into the future. Both sections fail to explain how bird habitat assessments and scenario projections will be assessed, validated or re-projected in the 5-year reports.
	<u>7.3.6 Winter Moose</u>	<p>Moose habitat units are referenced in the table and text, which appear to be actually hectares, since the values match the figures used throughout the rest of the Plan. This should be consistent throughout the document.</p> <p>What does the “total habitat units” in the table represent? The projected hectare change between years within each category is appreciated, but more explanation is required on how it is being summarized, and what specific change will be evaluated in the future.</p> <p>This chapter does not include a summer moose habitat section. The 5-year report should compare summer moose habitat projections vs. actual landscape change using the habitat suitability model used in the scenario planning. If the proposed quantitative summer moose habitat model is created, it can be incorporated at a later date.</p>
	<u>7.3.7 Marten Winter Cover</u>	We restate our comments here to help improve other wildlife sections and monitoring tables. The explanation of recalculation of habitat provided in this section should be mirrored in other species sections. This is exactly what the 5-year report should contain – projected vs. reality, followed by an amended projection.

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	<u>7.4 Future Monitoring</u>	We restate that this section does not contain any timelines for LP to “ <b>explore and pursue</b> ” any of the future monitoring projects. It leaves us wondering, what happens if LP does not explore or implement any of these ideas?
	<u>7.4.1</u>	We appreciate the detailed moose and elk habitat modelling approach that has been added to the appendices and agree with the methods proposed by the consultant. However, this section still lacks commitments and timelines regarding how data will be collected, obtained, and provided to the consultant for analysis. It also does not explain how these models will be incorporated into the plan and 5-year reports once they are created.
	<u>7.4.3</u>	We previously expressed appreciation for Louisiana-Pacific recognizing potential bias for surveying only summer sites, limiting the ability to collect information on bird use of particular habitat types. Identifying this gap, and assessing if SAR and indicator bird models could be enhanced or adapted with additional data collection will be an important aspect of an adaptive bird monitoring program. The plan should commit to collecting this additional data, since it is referenced in section 7.3.3 that “ <b>A habitat model could be built in the future if there are significantly more observations</b> ” for golden-winged warbler and olive-sided flycatcher. The plan should also explain how after models are developed, what actions Louisiana-Pacific could take if a decline in habitat is observed.
	<u>8.3.3.5</u>	We appreciate the all new roads will be decommissioned after use, however the statement “ <b>Nor will there be a significant change in the accessibility of the forest at a landscape level</b> ” cannot be supported if monitoring that determines the success of road decommissioning efforts is not conducted. The Branch has requested that this type of monitoring be included in our above comments.
	<u>Figure 8.11</u>	<b>Reactive side of the diagram</b> – Moose and elk population management is Government of Manitoba’s responsibility. Mitigation barriers and controls describing population management actions (e.g. harvest controls) should not be prescribed by Louisiana-Pacific, and should be removed from the diagram.
	<u>Figure 8.16</u>	<b>Bird species at risk – habitat loss (e.g. Canada warbler) – “survey summer cut blocks for bird species at risk” and “If SAR detected avoid harvest during bird breeding season”</b> Monitoring of species presence and deferral of harvest to winter is only avoiding disturbance to the nesting activities of that species, not addressing habitat loss. The quality and quantity of habitat must be monitored at the landscape level for species

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		<p>at risk, and it should be assured that adequate levels of habitat will remain in the future.</p> <p><b>Reactive side of the diagram</b> – Furbearer population management is Government of Manitoba’s responsibility. Mitigation barriers and controls describing population management actions (e.g. harvest controls) should not be prescribed by Louisiana-Pacific, and should be removed from the diagram.</p>
	<p><u>8.6 Vegetation</u> <u>8.6.1 Species of Cultural Importance</u></p>	<p>Moose should not be discussed in this section. A description of plant species of cultural importance should be added.</p>
	<p><u>8.7.1</u></p>	<p>These sections just list what or how many rare or endangered wildlife species exist in the province, not a description of which are known to or may occur in the FML, or an assessment of what other activities are impacting these species, and what effect forest operations may contribute.</p> <p>The Branch has previously suggested that Louisiana-Pacific contact the Manitoba Conservation Data Centre to obtain Species of Conservation Concern occurrences (SOCC) to add to their current “Wildlife point” database and assist with the forest management planning process.</p>
<p>Heritage Resources Branch</p>	<p>Title page</p>	<p><b>Recomentation (R) 1.</b> Include a title page for this document.</p>
	<p>List of regulatory pieces</p>	<p><b>R2.</b> Include a list a provincial legislation and regulation that govern LP’s forestry activities.</p>
	<p>Ch. 3 3.2 Socio-economic &amp; Social Environment</p>	<p><b>Comment (C) 1.</b> Explicit references to “Cultural and heritage resources, including sites or objects of archaeological, paleontological, historical or architectural value, as well as burial sites,” which are identified in 3.2 of the SD Draft Guidelines (2018), are lacking.</p> <p><b>C2.</b> “Heritage resources” are legally defined in <i>The Heritage Resource Act</i> (1986) and this terminology should be reflected in this plan as part of general awareness and legislated protection and mitigation efforts</p> <p><b>C3.</b> Refer 3.2.10.1 and 3.2.10.3 for recommended language alterations</p>
	<p>Ch. 3 3.2.10.1 Recreation and Tourism</p>	<p><b>R3.</b> Add a “Municipal and Provincially Designated Sites” section to the Recreation and Tourism Section.</p> <p>There are 35 municipally and provincially designated sites in FML#3 that hold special places in communities and are of a particular place and pride. These</p>



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		include historic homesteads, schools, mills, elevators, and churches. Affiliated with one of these churches is an Indian Residential school memorial.
	Ch. 3 3.2.10.3 Historic Values	<b>R4.</b> It could be identified in the preamble that FML #3 has a rich heritage containing approximately 20 museums and 270 known cemeteries, 35 municipally and provincially <i>designated</i> heritage sites and more than 1100 registered archaeological and paleontological sites. <b>C5.</b> Reference to indigenous histories is lacking.
	Ch. 3 3.2.10.3 <i>Historic Buildings, Collections and Heritage Sites paragraph</i>	<b>R5.</b> Change paragraph title from “Historic Buildings, Collections and Heritage Sites” to “Heritage Resources, including Historic Buildings, Collections, and Designated Sites” to reflect legal definitions in <i>The Heritage Resources Act</i> . <b>R6.</b> Add an explanatory sentence re: heritage resources, e.g., <i>Heritage resources include sites or objects of archaeological, paleontological, historical or architectural value, as well as burial sites. Thirty-five municipally and provincially designated historic sites are recorded in the FML #3 catchment area...</i>
	Ch. 6 6.2.3.1 Operational Planning Concepts	<b>R8.</b> Add to list of bullets, “Avoid significant heritage resources, which can include burial sites” <b>C8.</b> Including heritage resources in the operational planning concepts list identifies heritage resources as part of the operational planning process in the strategic plan
	Planning SOG 6.1 <i>Planning considerations</i>	<b>R9.</b> Please change “heritage sites” to “ <i>heritage resources</i> ” in the list of bullet points
	6.3 Heritage Resource Considerations	<b>C9.</b> Clear guidance re: where in the process heritage resources are assessed and how they are protected and mitigated need to be reflected in this guideline. <b>R10.</b> In the first paragraph, use the legal definition of heritage resources, i.e., a <i>heritage resources is legally defined as a heritage site, heritage object, and any work or assembly of works of nature or human endeavor that is of value for its archaeological, paleontological, pre-historic, cultural, natural, scientific or aesthetic features, and may in the form of sites or objects or a combination thereof.</i>
	Planning SOG 6.1 <i>Planning considerations</i>	<b>R9.</b> Please change “heritage sites” to “ <i>heritage resources</i> ” in the list of bullet points
	6.3 Heritage Resource Considerations	<b>C9.</b> Clear guidance re: where in the process heritage resources are assessed and how they are protected and mitigated need to be reflected in this guideline.

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		<p><b>R10.</b> In the first paragraph, use the legal definition of heritage resources, i.e., a <i>heritage resources is legally defined as a heritage site, heritage object, and any work or assembly of works of nature or human endeavor that is of value for its archaeological, paleontological, pre-historic, cultural, natural, scientific or aesthetic features, and may in the form of sites or objects or a combination thereof.</i></p> <p><b>R11.</b> Add a second paragraph describing how heritage resources are assessed and managed.  <i>E.g.,</i> Potential impacts to heritage resources are assessed during the Government review period of Operational Plans. If there is reason to believe that heritage resources or human remains are known, or thought likely to be present, on lands that are to be impacted, then LPC is required to conduct a heritage resource impact assessment (HRIA) and mitigation, if necessary, prior to forestry operations. A qualified archaeological consultant conducts the HRIA of the proposed project location(s), in order to identify and assess any heritage resources that may be negatively impacted by forestry activities. The Archaeological Assessment Services Unit (AASU) of Manitoba Sport, Culture, and Heritage works with LPC's heritage consultant to draw up terms of reference for these assessments. Measures to protect and mitigate impacts from forestry activities will also be developed in consultation with the LPC.</p> <p><b>C10.</b> These processes are captured in EAL 3893, #28</p>
	<p>Ch.7 7.2.2.2 Pre-Harvest Surveys</p>	<p><b>R12.</b> Please add "<i>heritage resources, which includes heritage sites and objects</i>" to the list of "exceptional features" that are identified in paragraph one.</p> <p><b>C11.</b> According to the Pre-Harvest Survey attached in Chapter 7, Appendix 2, "heritage sites aka heritage resources" are reported under the "Exceptional Features" option on the "Tiber Cruise Inventories." This should be reflected in the 20-Year Plan.</p>
	<p>Ch.7 Appen2 Pre-Harvest Survey Manual</p>	<p><b>R13.</b> Re: 3.2 Exception Features...            Pre-Harvest Survey Manual requires additional language and documentation identifying the recognition of heritage resources/objects. To be consistent with other illustrative material in the Pre-Harvest Survey Manual, illustrations/photographs exemplifying different classes of heritage objects (e.g., ground stone tools, projectile points, flakes; Indigenous ceramics; historic artifacts such as tin cans, machinery, glass bottles, ceramics; building foundations, earthworks, rock features, etc.) are advised. Specified flagging for heritage resources buffers should also be identified in the Pre-Harvest Survey Manual.</p>

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	<p>Ch. 8 8.10.4 Mitigation</p> <p>Re: Cultural and heritage resources management plan &amp; Chapter 6 Appendix 2 Planning SOG.</p>	<p><b>R14.</b> The Heritage Resource Considerations in 6.3 of this SOG are insufficient. SOG requires greater clarity for plans identifying heritage resources sites, mitigation and monitoring.</p> <p><b>C12.</b> No reference is made to management heritage resources should they be accidentally encounter during operations.</p> <p><b>C13.</b> Insufficient reference is made to long management of heritage resources in the FML #3</p>