



Keneknem Forest Tenures Ltd.
PO Box 1030
100 Mile House BC
VOK 2E0

June 03, 2021

Pat Byrne, District Manager
100 Mile House Natural Resource District
PO Box 129
100 Mile House BC
VOK 2E0

Dear Mr. Byrne;

Re: Request for Proportional FSP Targets

As per Section 9 of the Forest and Range Practices Act Keneknem requests proportional targets for seral on FNWL N1I, consistent with our recent (April 28, 2021, FSP ID 871) submission of the Keneknem FSP, Version 4.0. Proportional targets are implemented in our FSP via FSP Section **4.6 Wildlife and Biodiversity at the Landscape Level-Seral, Patch and Connectivity**. Applicable results and or strategies under FSP Section 4.6 include; 2, 7, 8 and 9. The analysis that details the existing seral condition on FNWL N1I is included in **Appendix 1 Seral Targets** of our submitted FSP. Rationale for the request is below.


One or more agreement holders may be unduly constrained in specifying results or strategies unless targets are established.

- Keneknem needs to be able to operate on all of its tenure, to avoid cumulative impacts, manage for fire hazard and to implement the community landuse plan, Snine Forest Stewardship Plan.
- Large volume based operators can shut down Seral Assessment Units by harvesting up to the mature plus old limits on those units. In that case, large operators simply move to new and different Seral Assessment Units.
- Large operators do often concentrate their harvesting into available units and we are currently seeing more activity in the Canim area.
- Keneknem cannot move, and could, under these conditions, have parts of its area based tenure frozen, until lands adjacent to the Keneknem tenure grew more mature timber. The effect of this could be damaging on the effective Keneknem AAC and significantly impede tenure management.

The agreement holders within the area are unable to reach an agreement that would remove the constraint.

Keneknem contacted West Fraser, BCTS and Tolko regarding proportional targets. After some discussion, all parties agreed to Option 1, which was "*Keneknem cannot reach a seral agreement with any one of BCTS, Tolko and West Fraser. In that case Keneknem will receive proportional seral targets under its FSP*". No licensee had an issue with Keneknem receiving proportional seral targets, and acknowledged why we would want and need them. However, all the licensee's wanted the proportional targets formalized by the Crown rather than by a licensee agreement. This was documented in an email from December 18, 2020.

Yours truly,


John Kalmokoff, RPF
Keneknem Forest Tenures Ltd.