

Chronology - review of Hidden Creek FOIP Materials received September 6, 2013

Date	Page	Main point	Author (cf: tab 2)	Context	Other documents referenced	Date of response	Response	Result	AWA Comments
16-Dec-08	7	Hidden Creek population of BLTR sensitive because of genetic bottleneck in past, the genetic work shows it is the primary source tributary for the Upper Oldman, contributes most migrants. Should be given highest conservation priority.	MC	Notes from meeting with SLS					
16-Dec-08	7	Road was supposed to be decommissioned, recontoured, put to bed, closed to motorized vehicles. Alberta Forest Service ADM committed to this in 1984, road still used heavily by OHVs, gate at bridge over Oldman not closed.	MC	Notes from meeting with SLS					Also referenced in KC letter to TR, p.8. See also excerpts from p.105, p.150
22-Jan-09	8	Class 'A' waters are to receive the highest level of protection, and any proposed activities affecting them must follow a process that involves site-specific review by a multi-agency panel and approval by designated decision-makers. I am requesting a letter from you be written to SLS because there is currently no mechanism in place for Area Fisheries Biologists to make revisions to the existing Code of Practice maps designating which streams are Class 'A'.	KC	Letter to TR			No followup immediately apparent, but see also excerpt from p.92.		Only further reference to site-specific review comes as an attempt to circumvent same: see excerpt from p.43
09-Mar-09	13	Fish and Wildlife recommends that this harvest be deferred for a period of at least 5 years to evaluate alternatives.	MC	Email to DW*					
09-Mar-09	13	Given that Fish and Wildlife considers Hidden Creek as Class 'A' and the fact that the Alberta Water Act Code of Practice for Watercourse Crossings states that uncoded waterbodies entering mapped waterbodies that are Class A have the same class as the mapped waterbody for a distance of 2km upstream from the mouth of the uncoded waterbody, tributaries to Hidden Creek would also be considered Class 'A' for a distance of 2km	MC	Email to DW*	http://www.qp.gov.ab.ca/documents/codes/Crossing.cfm		None as such	None	MC keeps pressing this point, however no further mention made after the May 28, 2012 meeting. See also matrix p.62; excerpts p.80, p.102, p.121.
09-Mar-09	14	It is Fish and Wildlife's position that neither the 'High Road' nor the 'Low Road' proposed to access the cut blocks would represent an acceptable level of risk to the Hidden Creek fishery.	MC	Email to DW*					Unclear whether this refers to the road between 0833 and 0774 (in which case it is an ongoing concern) or between 0733 and 1272 (in which case it is moot, as 1272 was dropped from the final plan for this, and other, reasons). See also matrix p.62.
09-Mar-09	14	Maintaining a low grade quad trail following road reclamation will only serve to encourage their continued use by recreational OHVs following harvest. This has already occurred in the headwaters of Hidden Creek in the network of trails connected to the Dutch Creek haul road.	MC	Email to DW*					See also matrix p.62.
09-Mar-09	14	The Restricted Activity Period (RAP) under the current Class 'B' designation of Hidden Creek [...] is from September 1 to August 15. When the RAP was set it was felt this period adequately protected cutthroat trout fry emergence and bull trout spawning. However [...] 17 redd's were observed in the creek [...] on September 2, 2008. Therefore it is possible that if work is conducted between August 15 and September 1, Bull Trout will already be migrating into the creek and may be spawning at this time. [...] We do not feel Spray Lake Sawmills can claim [...] that their work will avoid migration, spawning, and incubation periods.	MC	Email to DW*				Other than in the matrix on p.63, it is unclear this was ever brought up again.	See also matrix p.63.
20-Apr-09	26	This portion of the AOP [proposing the harvest of blocks within the immediate vicinity of Hidden Creek] is not approved and is deferred based on the following information: 1. [...] Fish and Wildlife considers Hidden Creek to be Class 'A' [...] and will be pursuing a legislation change to reflect this new information. [...] Bull Trout [...] populations throughout the province are threatened and [...] Hidden Creek [...] is one area in the [Upper Oldman] watershed for which current data unequivocally supports a critical habitat designation. 2. Genetic data [...] has identified pure strain Westslope Cutthroat Trout as residing in Hidden Creek as well. [...] Because of the highly restricted distribution [...] all habitat occupied by this species is critical to its continued viability.	RC	Letter to SLS denying approval of the Hidden Creek portion of the 2009/2010 CTLCO50007 AOP	Water Act Code of Practice (COP) for Watercourse Crossings				See also matrix p.62.
20-Apr-09	27	This area is to be deferred until such time as the re-classification of Hidden Creek has been completed. SRD will then initiate a compartment assessment within this watershed area to further assess overall forest management objectives	RC	Letter to SLS denying approval of the Hidden Creek portion of the 2009/2010 CTLCO50007 AOP				CA never performed	See also excerpts from p.112, p.123, p.134, p.165
17-Jul-09	43	Watercourse classification change is enabled by an approved amendment to the CoP legislation. [...] I believe we can work well with our GoA and DFO regulatory partners towards achieving enhanced protection for proposed Class 'A' sites on a voluntary basis. I'm proposing an approach that I'll call "Class B-Plus" or "Class A-Minus" [...] the substantive difference between Class 'A' and other classes is the negative approach (i.e.: no activity unless decided otherwise) and the joint review process that's initiated when an application is received. There's nothing to say that we can't employ a less formal review / discussion process with co-regulators and the proponent in a non-Class 'A' situation where the approach is already positive (i.e., the activity will proceed, but following specified conditions). [...] We could bring extra justification & "muscle" to bear if the species were listed or otherwise had an ESCC designation.	DP	Email to TR, MC		17-Jul-09	TK: "The alternative approach described by Dave will have to be discussed with AENV [...] as it can be seen as a departure from the Codes." [excerpted from p.43]	No further explicit reference to classes "A-Minus" or "B-Plus". However see p.133 where MC describes the state as a de-facto B-Plus (or whatever) even if it is not referred to as such there.	cf. joint-review process: see excerpt from p.8

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28-Jul-09	48	The higher order classification would require a 20m buffer from the high watermark. The current buffer averages 20m and presents little risk to siltation. Proposed decking area [...] shall be built according to ground rule spec (30m from high water).	CH	Email to MC regarding observations of block 0902 made on July 24 field trip.		N/A	N/A	N/A	Included as point of information only. The "higher order classification" presumably refers to Class A? The watercourse referred to is marked on maps as an "Intermittent Waterway," examples of which elsewhere did not receive a 20m buffer (let alone 30m) in practice.
29-Dec-09	56	when it comes to communicating our concerns about fish habitat sensitivity and protection, the voice of [the Fisheries Management Branch] should not be heard only through the [Code of Practice and its watercourse classifications]. The setting of riparian buffers or other guidelines of timber harvest practice should not be contingent on a regulatory framework that was designed to fulfill AENV's regulation of watercourse crossings. Rather, the voice of FMB needs to be heard in a more relevant manner, and in a fish context that is more inclusive of concerns relative to more than just bull trout (which is by and large the focus of the CoP stream classifications).	DP	Email to TK, TR, KC, DW					
29-Dec-09	56	Daryl and Travis, I don't think that your efforts to protect Hidden Creek should be affected in any way by its CoP designation. [...] Forest Management needs to hear that Hidden Creek deserves a level of protection that you prescribe as the fisheries managers, whatever that may be, and take it from there. [...] Most, if not all, of us agreed that the designation of "critical" habitats ala the CoP was not in the best interests of fish.	DP	Email to TK, TR, KC, DW					
?	62	[MC comments in rows 29-32 of matrix repeat comments excerpted above from pp.13-14, p.26]	MC	Comments in review matrix from 2009-2010 SLS AOP Review for CS FMU			None	Comments in this matrix may have been a factor in the initial denial of approval for the AOP?	See also excerpts from pp.13-14, p.26.
?	63	[MC comments in row 33 of matrix repeat comments excerpted above from p.14]	MC	Comments in review matrix from 2009-2010 SLS AOP Review for CS FMU			None	Comments in this matrix may have been a factor in the initial denial of approval for the AOP?	See also excerpt from p.14.
05-May-10	64	what we have now is Hidden Creek considered a large permanent for the majority of its length and the tributaries all classified as either intermittent or ephemeral. Typically when the blocks are laid out, the forester will designate the classification in accordance with the OGR Table 2.	TR	Email to MC, DW	CS OGR				Which forester? How do they make that decision? (OGR table 2 only lays out the consequences of a designation, not any factors that go into the decision.) This question came up on AWA field trip to Hidden Creek, December 2012. Answers did not reassure us that any rigor went into the decision. (The answer was essentially the same as the wording seen here.) Yet there are practical consequences to the choice.
06-Aug-10	79	While this formal classification change [of Hidden Creek to Class 'A'] has not yet been completed, this should not hinder the process for assessment and approval of the future timber harvest within the Hidden Creek watershed. These conditions include the re-design of the [...] blocks, roads and watercourse crossings within the [...] watershed using the 2009 Spray Lake Sawmills/CS Operating Ground Rules. Specifically, [those] which identify standards for operating around Class "A" Water Bodies.	RB	Letter to SLS	2009 CS OGR				
06-Aug-10	80	Roads, Landings, Decking and Bared Areas [...]: "Not permitted within 100m of high water mark. [...] Any proposed watercourse crossings within 2km upstream must be specifically approved in the AOP."	RB	Letter to SLS					See also excerpt from p.170
06-Aug-10	80	"No disturbance or removal of timber within 100 metres of the high water mark (Clarification: the 100 metres treed protective buffer only applies to the designated main stem of Hidden Creek). No duff disturbance of intermittent (minimum 10 metres vegetated buffer) or ephemeral drainages (minimum 5 metres vegetated buffer) within 2km upstream of Class A water body." [emphasis in original]	RB	Letter to SLS					What prompted this? It does appear that SLS were explicitly instructed in a manner contradictory to MC note on pp.13,etc.
24-Aug-10	87	The existing road is <u>meters</u> from bull trout spawning and should not be used as a haul road. If it was, this would be in direct violation of the intent of the ORGs [sic] to protect sensitive fish species (1994 or 2009). [emphasis in original]	MC	Email to TJ, TR, JL, MK, CH					All further context redacted from FOIP as "Non-responsive."
26-Oct-10	88	The current SLS's AOP has the company using portions of the old trail adjacent to Hidden Creek [...] that is not acceptable to SRD. Also, SLS's alternate haul route located upslope would require significant sidehill cuts which would elevate the risk for sediment eroding downslope into tributaries or directly into Hidden Creek which would also be unacceptable.	JL	Email to AA requesting use of LIDAR to find alternate route			Unknown	Unknown	So all options they knew about have been dismissed as "unacceptable"... including the one that eventually ended up being used.
"Between March 25, 2011 and April 14, 2011"	92	A letter will be sent by AENV Southern Region to the company telling them they must treat Hidden Creek as class 'A' under the water act.	MC	Notes from phone call with TR					

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08-Aug-11	100	I was working hard with Augustus Archampong [see April 27 letter, pp.93-98] to get Hidden Creek changed or at least a letter written from AENV to Spray Lakes Sawmills stating the creek should be treated as class A.	MC	Email to DP re: request from the latter for listing of all proposed Class A watercourses					
08-Aug-11	100	[The foresters] are saying they will treat the mainstem as class A and not cross it, but they want to cross [its] tributaries within 2km of it and allow a road within 100m of the stream	MC	Email to DP re: request from the latter for listing of all proposed Class A watercourses					
August, 2011	101	[A bridge option between blocks 0833 and 0774] would require a moving of the bridge location north away from Hidden Creek. We [...] settled on one that allowed for the settling of silt onto a flat on the east side of the bridge. [...] we believe that we have found a location that minimizes risk. It is within the 100 meter buffer and located in the 60 to 70 meter range away from Hidden Creek.	TJ	Email to MK, JL					
August, 2011	102	Generally there is flat ground between the block boundaries and the stream therefore the possibility of silt movement down to the stream is nil therefore boundaries could be left as is.	TJ	Email to MK, JL					Note use of the word "generally," MC disagrees that this is universally the case; see excerpt from p.134
August, 2011	102	The Class A stream designation applies to tributaries 2 kms on either side of the main designation and that the 100 meter buffer applies. The implications of 100 meter buffers on all feeder streams into a class A would be high and the TSA would have to be recalculated if the number of streams being considered for Class A status are approved.	TJ	Email to MK, JL					This appears to be the last time anyone other than MC brings this up.
August, 2011	102	I would recommend that we approve the proposed changes to the roading that would be deviations from the Class A stream guidelines of the AOP. Then approve the revised AOP with block boundaries as layed out that vary along the 100 meter boundary as dictated by terrain.	TJ	Email to MK, JL					Here TJ starts requesting approval of the SLS AOP; continues to do so until it is granted in mid-2012. See also excerpts from p.107, p.112, p.165
15-Aug-11	104	When we got to the tight point [the first point ... where the proposed haul road is within the 100 meter buffer] Tim reiterated to SLS that the existing trail and proposed haul road in this area were too close to Hidden Creek for an authorized deviation from the OGRs [...] as long as the road wasn't too close to Hidden Creek, some deviations from the 100 m buffer would be acceptable throughout the harvest plan. Due to the sensitivity of the spawning habitat there, I would like to see the OGRs followed stringently.	MC	Email to DW following site visit					
15-Aug-11	104	I did raise the point that according to the Code of Practice for Watercourse Crossings, the tributaries are also classified as Class 'A' the same should apply for its tributaries. Tim said I would need to follow up with Jamie Bruha about this.	MC	Email to DW following site visit					Likely what caused TJ to bring up the point in his email (see excerpt from p.102). Have no record of a followup with Jamie Bruha.
15-Aug-11	104	There is no way to proceed with harvest in the Hidden Creek drainage and be certain that the sensitive spawning habitat it supports would not be damaged. Although the adjacent route laid out around the tight point may be a slightly better option than using the existing trail immediately adjacent to the creek, it still involves too great a risk to the Bull Trout.	MC	Email to DW following site visit					
15-Aug-11	105	Recontouring and putting to bed the existing trail along Hidden Creek was discussed, including the commitment made by the Alberta Forest Service to do so in 1984. [...] I would obviously like to see this happen, but this would be a decision the Lands Division would have to make.	MC	Email to DW following site visit					See also excerpts from p.7, p.150
14-Sep-11	107	It would be good to move orward on the Hidden Creek AOP decision that may be required via managers and the Forest Management Branch. SLS has been instructed not to make any of the suggested changes to the roading that we discussed until they have heard back from us.	TJ	Email to MK					See AWA comments to excerpt from p.102
31-Oct-11	108	you can proceed with field modifications of roading for the Hidden Creek harvesting proposed in CSL7. In addition to completing the changes to roading [...] to address some of Matthew's concerns it would be necessary to also address the soil/water crossing issues as they relate to Class A waterbodies, clarify the season of harvest (start and end timing), road construction timing, reforestation timing, reclamation (method, timing and commitment to decommission some sections of the old existing trail) and a plan identifying ongoing monitoring for erosion potential	TJ	Email to MW					The last bit (ongoing monitoring for erosion potential) did not happen. See also excerpt from pp.133-134.
14-Feb-12	112	Tim has repeated his request that SLS resubmit an AOP. This is despite the original letter sent to SLS April 20, 2009, by Roy Campbell, Southern Rockies Area Forestry Program Manager, which stated: "This area is to be deferred until such time as the re-classification of Hidden Creek has been completed. SRD will then initiate a compartment assessment within this watershed area to further assess overall forest management objectives and timber harvest strategies, and SLS will be contacted at that time for input.	MC	Email to TR, DP	Roy Campbell letter to SLS, April 20, 2009; included and excerpted as pp.26-27				See excerpts from pp.26-27, p.123; AWA coments to excerpt from p.102
22-Feb-12	121	if crossing anything within 2km of Hidden there would be a review panel that I or Dave would chair according to the working agreement.	MC	Notes from phone call with DP					See also excerpt from p.13

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05-Mar-12	124	My understanding is that we are proceeding with reviewing the changes to roading and moving to AOP approval this spring. [...] this means [...] that decisions have been made by upper management to proceed with the AOP.	TJ	Email to GH		05-Mar-12	JJ: "The letter from Roy Campbell [included and excerpted as pp.26-27] is pretty clear in terms of a deferral of harvesting until such time as the redesignation of Hidden Creek has been completed and a Compartment Assessment has been done addresses the fisheries issues. The redesignation [...] is still pending and there has been no Compartment Assessment completed. Moving to an AOP for this spring would appear premature and not consistent with previous direction." [excerpted from p.123]	Response from JJ notwithstanding, the AOP was approved on Sep. 11, 2012 (see excerpt from p.176) without any CA.	
05-Apr-12	127	The OGRs with respect to Class 'A' streams are not being [followed]. As expected, the proposed road is well within the 100 m buffer for a distance of approximately 2 kms. It cuts up and down steep slopes 18-20% grade, and it crosses a small permanent tributary to Hidden Creek only about 40-50 meters from Hidden Creek. This crossing has very steep approaches on both sides. Another issue is the cut blocks still overlap the 100 m buffer for timber removal [...] by up to 40 m.	MC	Email to DP					A representative sample from repeated claims to the same effect made by MC around this time.
09-Apr-12	132	Forestry treats the OGRs as guidelines and allows deviations all the time. They certainly don't treat them as hard and fast rules. [...] Their case re the cutblock deviations into the buffer is that the ground in these locations is level and there would still be adequate buffer to prevent runoff into the creek.	JJ	Email thread with MC					
09-Apr-12	132	Except for the short section of alternate road with the crossing I am concerned about the rest of the road is the same as the original plan and has not been moved outside the 100 m buffer.	MC	Email thread with JJ					Referring to the road being "within the 100 m buffer for a distance of approximately 2 kms" earlier in the thread.
23-Apr-12	133	it has become clear that [seeing if the proposed harvest could still be undertaken while following Class 'A' requirements] was, in fact, not the intent of the [August 2011] tour, and the tour was conducted with the understanding that deviations from the OGR requirements for Class 'A' streams could still be approved and Hidden Creek could continue to be treated as a Class 'B' watercourse.	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"					More on the tour referenced in the email excerpted from pp.104-105. Also possibly prompted the email excerpted from pp.101-102. See also notes and discussion of "A-plus" vs. "B-Minus" etc. excerpted from p.43.
23-Apr-12	133	there was unanimous support amongst the management team that SLS must clearly demonstrate that whatever they propose for Hidden Creek will not impact the Bull Trout spawning habitat, and that above and beyond normal mitigation measures will be used.	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"		24-Apr-12	TJ: "The 'early in' and early out' requirements, hauling on frozen/snow road to minimize dust and aggressive reclamation timing are all measures of mitigation." [excerpted from p.136]	None of which I am aware.	Who makes up the management team that professed this unanimous support? Followup/rebuttal to TJ response excerpted from p.146. See also excerpt from p.148
23-Apr-12	133	The proposed road crosses two tributaries ~60 m from Hidden Creek, which are well within the distance before suspended sediment would settle out of the water column and immediately upstream of a 1.8 km section of the creek with the highest Bull Trout redd densities anywhere in the Oldman basin. Bull Trout are [...] particularly sensitive to sedimentation. [...] The AOP does not demonstrate that these impacts of harvest have been assessed by SLS. No aggressive erosion control measures have been identified in the AOP.	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"					See excerpt from p.108 calling for "a plan identifying ongoing monitoring for erosion potential."
23-Apr-12	134	[...] the tour [...] describes this as a 'steeper creek crossing hence more erosion into a feeder stream of Hidden Creek' [emphasis in original]	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"					idem.
23-Apr-12	134	The first letter [...] signed by Roy Campbell [excerpted as pp.26-27] said harvest would be deferred until class 'A' re-classification was completed and then a compartment assessment within the Hidden Creek watershed would be completed. The second letter [excerpted as pp.79-80] indicated harvest could actually proceed even through the re-classification was not complete, but it clearly specified the conditions no roads, landings, decking, bared areas, or removal of timber within 100 m of Hidden Creek.	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"					This documents the disappearance of the requirement for the CA, at least in communications with SLS. See also excerpt from p.27.
23-Apr-12	134	There are still some block boundaries where there is no flat ground beyond the edge, and they extend to the top of the bench with steep slopes down to Hidden Creek.	MC	Email to TJ, CH, JL, MK, RM re: "opportunity to provide input on the Hidden Creek AOP submission"					Rebuttal of claim made in excerpt from p.102
24-Apr-12	137	By pulling this road section out we will of course be allowing the existing OHV trail to remain in place at a location about 1-2 meters from the stream. I had suggested to you that an option for the area, if the trail must remain, is that the mud puddled trail beside Hidden Creek be lined with appropriate crush gravel to stop the splashing of mud into the creek.	TJ	Email to MC in response to MC submission excerpted as pp.133-134.					The presumption that "splashing of mud" is the greatest concern here, compared to the ongoing widespread erosion, is questionable. Notably absent is any recognition of the option promised in 1984, of removing the OHV trail entirely.

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01-May-12	138	SLS needs to go back and come forward with a detailed mitigation strategy around the road building and block harvesting - all designed to address the potential erosion and siltation issues associated with this harvest plan and impacts to Hidden Creek	JJ	Email to MC addressing his questions about "how to proceed with Forestry"					
01-May-12	139	I am wondering if we could ask for a [deferral] until the SSRP is complete. The area is one of the conservation areas recommended by the SSRP RAC. The harvest would also seem to be in direct conflict with the Initial Conservation Action Statement for Bull Trout signed by the minister. OHV access control measures in the area have been identified as a need by the SSRP RAC. Linear disturbance density is also a concern.	MC	Email to JJ wondering "how to proceed with Forestry"	Bull Trout ICAS excerpted as pp.75-76, adopted by minister Mike Cardinal in April 18, 2002 letter excerpted as pp.45-46.		None apparently included in the FOIP	None	
?	146	It is Fish and Wildlife's position that the aggressive erosion control and mitigation plans committed to at the Southern Rockies program managers meeting are not reflected in the Hidden Creek AOP submission. I am requesting that this AOP not be approved at this time. Timing restrictions and hauling on frozen ground are part of normal operations. [emphasis in original]	MC*	Email to TJ following up on thread excerpted as pp.133-134, then pp.135-137					See also excerpt from p.133
14-May-12	148	I question why all these deviations [from the OGR] can be approved, while at the same time the OGRs are consistently declared the tool that mitigates or prevents environmental and ecological impacts. [...] Furthermore, Groundrule 6.0.6 states: "Unless otherwise approved in a FMP, variances from the standards in Table 2 [...] shall undergo a full review by Alberta as a component of the FHP review." Are variances undergoing a full review before approval?	MC	Matrix (unknown context) included in email sent to GH	CS OGR				
14-May-12	148	there was unanimous support amongst the management team that SLS must clearly demonstrate that whatever they propose for Hidden Creek will not impact the Bull Trout spawning habitat, and that above and beyond normal mitigation measures will be used (i.e.: aggressive erosion control measures beyond normal procedures). This resubmission does nothing to demonstrate that it has been done. [...] It makes no mention of any mitigation measures to avoid impacts to the spawning habitat and gives no indication that potential impacts have been assessed.	MC	Matrix (unknown context) included in email sent to GH					See also excerpt from p.133
14-May-12	149	The crossing [...] between Blocks 0833 and 0744 side-cuts a steep slope on the east side (~60% grade), requires significant amounts of fill [...] to minimize road grades, and still has a road grade on the west side of the crossing that is very steep (~18-20% grade). Tim Juhlin's summary following the field tour last August describes this as a "steeper creek crossing hence more erosion into a feeder stream of Hidden Creek". Again, no impacts have been assessed and no erosion control measures are discussed.	MC	Matrix (unknown context) included in email sent to GH					
14-May-12	150	The risk of unrestricted OHV access and leaving the existing trail along Hidden Creek open has not been assessed or mitigated for. 2 kms of proposed haul road are within the 100 m buffer, ~900 meters of this on the existing trail, which has heavy OHV use resulting in sedimentation of the creek. [Commitment] was made in 1984 to close, recontour, and put to bed this trail. During the field tour last August, commitment was made again to reclaim at least portions of the existing trail as well as any new roads built. However, SLS's [...] AOP states the existing trail will not be reclaimed to allow access for planters. From Tim Juhlin's summary following the field tour last August: "[...] SLS responding to Matthew's inquiry said that they felt it was possible to remove access for OHV"	MC	Matrix (unknown context) included in email sent to GH					See also excerpts from p.7, p.105
?	155	Even if we are able to do some water quality monitoring next spring and summer, we don't have appropriate thresholds in place to trigger any non-compliance enforcement actions if sedimentation to the creek does increase over the short or long-term as a result of the harvest.	?	?					
16-Jul-12	165	An [amended] AOP can be approved, if all these conditions are met. [...]: - no harvest within 100m of Hidden Creek [...] - road construction starts in late [November] and harvesting, hauling, and reclamation are complete by the end of February [...] - hauling occurs during frozen ground conditions - sediment fencing [...] where the road is within 60 meters of the strea and there is a direct grade down to Hidden Creek [...] - monitoring after reclamation (weekly during first spring/summer and ongoing until the road system is deemed stabilized) [...] - reclamation of roads back to either OHV trail or a fully reclaimed state, as specified in the matrix - [erosion] control [...] on sections of road [overlapping] existing trails - no scarification within 100 meters of Hidden Creek and close monitoring of slash loads [...] to minimize scarification impacts - use of box crib bridges is desired for most drainages regardless of class	MC	TJ, JL					Gone are any discussions of CA, of 100m buffer around tributaries of HC, of closing and recontouring OHV trails (ala 1984), of the Bull Trout ICAS, of 2km of haul road within 100m buffer of HC, of "above and beyond normal" erosion control or mitigation, of cut blocks with a direct slope into the watercourse... SLS can now proceed with the harvest.

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	166	These disposition entries require direct communication with the organization involved. It would be appropriate that your notification letters not be generic in nature but actually provide specific information affecting the party's disposition. Notification letters of harvest areas and the open house are acceptable for some of the general public however where specific groups, dispositions and issues are [known] it is required that consultation with documentation be included in the AOP.	TJ	Comments in review matrix from 2010-2011 SLS AOP Review for CS FMU					Not particularly relevant to the issue at hand, but interesting in light of consultation issues in general with SLS, including concerns re: FSC, etc.
16-Jul-12	168	Hidden Creek is a stream off the Old Man river that has bull trout "REDS" and is believed to contain pure stream cutthroat so there is a priority to protect the watershed as Class A.	TJ	Email to KG					Noting TJ's use of the qualifier "believed to" contain WSCT. Everyone else just comes out and says it contains WSCT.
24-Jul-12	170	Watercourses and water source areas are crossed by a haul road without crossing structures identified - One small permanent crossed without a crossing structure identified - Six water source areas without crossing structures identified	MC	Email to JE summarizing Hidden Creek CTL050007 Deviations	F&W Bull Trout Conservation Management Plan 2012-2017; CS OGR; ICAS for Bull Trout excerpted as pp.75-76				
24-Jul-12	170	Treed buffers are missing or not meeting minimum requirements on at least a portion of all block boundaries (OGR requirement for Class A is 100 meters, 30 meters for small permanent streams, 20 meters for water source areas)	MC	Email to JE summarizing Hidden Creek CTL050007 Deviations	Aug 6, 2010 letter from RB to SLS excerpted as pp.79-80				See also excerpt from p.80
24-Jul-12	170	Main haul road will be within 10meters of Hidden Creek at one point, with a ~700 meter section where it is within 25 meters of Hidden Creek (OGR requirement for Class A is 100 meters)	MC	Email to JE summarizing Hidden Creek CTL050007 Deviations	Aug 6, 2010 letter from RB to SLS excerpted as pp.79-80				See also excerpt from p.80
26-Jul-12	172	ESRD would like SLS to resubmit the CSL7 AOP with the inclusion of a write-up of your mitigative commitments based on your matrix comments plus add any other measures that you are prepared to commit to [...]. The external matrix would then be dropped from the final AOP approval. It has been noted that in your external Matrix response some requested commitments were not specifically agreed to. ESRD has taken the time to summarize the specific conditions from the external matrix and for clarity have added some statements below to assist you in your write-up.	TJ	Letter to SLS re: resubmission of AOP					So... who's writing the proposed AOP: SLS or ESRD? (Our understanding was that it was supposed to be the former.)
26-Jul-12	173	on July 16, 2012 it was confirmed that block 1272 will be dropped from the sequence due to the cost of roading and impact of additional buffering that reduces the block volume below acceptable levels to justify the access.	TJ	Letter to SLS re: resubmission of AOP					
23-Aug-12	174	the OGR's review process is the venue for [implementing new standards that are to be commonly used]. We view the case of Hidden Creek as unique and would not want to ingrain processes in the OGR's that would not be standard.	TJ	Letter to SLS in response to request for clarifications					
23-Aug-12	174	Other Class A designations such as for Mill Creek are being considered and perhaps some adjustment of the OGR addressing Class A waterbodies might be appropriate during the next AOP review.	TJ	Letter to SLS in response to request for clarifications					General point of interest for AWA and the ENGO (and wider) community.
11-Sep-12	176	You are hereby granted approval for AOP operations for the operating period Sept 10, 2012 through April 30, 2013. This AOP approval is subject to [...] the following: 1: A joint pre-harvest inspection of the completed layout revisions is to occur before operations begin. 2: ESRD will inspect the reclaimed portions of the recreation trail [...] upon request from the Company. Any use of this recreation trail for transporting planters will require a separate approval. [...]	MK	Letter to SLS					
03-Oct-12	180	Given the broad distribution of groundwater springs across the affected slopes and the steepness of the slopes in some sections of the road and parts of the cutblocks, impacting the sustainability of the fish populations and the habitat cannot be avoided with this plan.	MC	Email to TJ, RH, JB following Oct 2 field inspection		12-Oct-12	MK letter to SLS: "A field viewing of the layout revisions occurred [...] between ESRD and Spray Lake Staff. The layout is deemed to be satisfactory and Condition 1 from the [...] approval [excerpted from p.176] has been satisfied. You can proceed with harvest operations" [excerpted from p.183]	MC concerns did not figure in ESRD notice of evaluation	
03-Oct-12	180	the existing OHV trail [...] is already intersecting groundwater and bringing it to the surface before it up wells in the creek, further increasing the risk of this with the proposed haul road s not an acceptable risk given the sensitivity of the fishery in terms of over winter egg incubation and maintaining cold water temperatures.	MC	Email to TJ, RH, JB following Oct 2 field inspection		idem.	idem.	idem.	
03-Oct-12	180	The greatest risk [of sedimentation] remains [...] where the road comes within 9m of the cliff down to Hidden Creek and [...] where it side cuts steep slopes (55-65%) and then crosses a permanent tributary with a direct approach from the west of 18-20% slope. Even if a road is pulled out on the same winter as it is built, the bare unconsolidated soil will be at a risk of erosion. In this area there are locations where there is a direct grade down to Hidden Creek or the tributary. [...] The area of greatest concern where the road side cuts steep slopes within 60m of Hidden Creek and its permanent tributary is a high-risk deviation [from the OGRs].	MC	Email to TJ, RH, JB following Oct 2 field inspection		idem.	idem.	idem.	

Chronology - review of Hidden Creek FOIP Materials received September 6, 2013									
Date	Page	Main point	Author (cf: tab 2)	Context	Other documents referenced	Date of response	Response	Result	AWA Comments
03-Oct-12	180	The only way to mitigate the risk would be to close and reclaim the existing OHV trail, keep the roading further from the creek, and avoid areas where the slope exceeds 45%.	MC	Email to TJ, RH, JB following Oct 2 field inspection		idem.	idem.	idem.	
29-Oct-12	190	Approval has been granted for harvesting in Hidden Creek. The remainder of the areas being referred to are in the early stages of planning. We will likely see plans to harvest this for the 2013/14 timber year. Yes, they will be potentially harvested prior to SSRP, pending completion date of the regional plan.	MK	Email to CM					General point of interest for AWA and the ENGO (and wider) community. Identification of "the areas being referred to" is redacted from FOIP as "Non-responsive."
20-Nov-12	191	Based on my findings from the review of this large file [provided by MC to DJ] (i.e., OGR's, AOP submissions, referral notes, internal correspondence, external correspondence with SLS) and interviews I have undertaken [...] in addition to our discussion at your office -- as Acting Area Manager, I am affirming the Forestry Program Manager's (Morgan Kehr) approval decision and am not prepared to "reinstate the deferral of this license"	DJ	Email to MC					How disappointing.

Where a name reference is given as ? it is unknown. Where it is given as **XX*** it is not 100% certain but probably XX.

Initials	Name	Title
AA	Axel Anderson	Foothills Research Institute; (E)SRD
CH	Craig Harriott	Forest Officer, Southern Rockies Area, (E)SRD
CM	Chad Morrison	Acting Exec. Asst. to ADM for Forestry, (E)SRD
DJ	Darryl Johnson	Acting Area Manager, Prairies Area, (E)SRD
DP	David Park	Fisheries Biologist, (E)SRD
DW	Daryl Wig	Senior Fisheries Biologist, Fish & Wildlife, (E)SRD
GH	Greg Hale	Senior Wildlife Biologist, Southern Rockies Area, (E)SRD
JB	Jamie Bruha	Senior Forester, Timber Operations, Forest Mgmt., (E)SRD
JE	Jennifer Earle	Fisheries Biologist, S. Rockies Area, Fish & Wildlife, (E)SRD
JJ	Jon Jorgenson	Senior Wildlife Biologist, (E)SRD
JL	Jean Lussier	Senior Area Forester, Southern Rockies Area, (E)SRD
KC	Ken Crutchfield	Executive Director, Fisheries Mgmt. Branch, Fish & Wildlife, (E)SRD
KG	Ken Greenway	Senior Manager, Reforestation, Fisheries Mgmt. Branch, (E)SRD
MC	Matthew Coombs	Fisheries Biologist, S. Rockies Area, Fish & Wildlife, (E)SRD
MK	Morgan Kehr	Forestry Program Manager, Southern Rockies Area, (E)SRD
MW	Martin Wilson	Woodlands Forester, SLS
RB	Rick Blackwell	Area Manager, Southern Rockies Area, (E)SRD
RC	Roy Campbell	Forestry Program Manager, Southern Rockies Area, (E)SRD
RH	Rupert Hewison	Forest Officer, Southern Rockies Area, (E)SRD
RM	Robert Mueller	Forester, (E)SRD
TJ	Tim Juhlin	Area Forester, Southern Rockies-Blairmore, (E)SRD
TK	Terry Kosinski	Head, Resource Integration and Planning, (E)SRD
TR	Travis Ripley	Fish and Wildlife Manager, Southern Rockies Area, (E)SRD Later: Executive Director, Fisheries Mgmt. Branch, (E)SRD