

Lakes Timber Supply Area Timber Supply Review

Summary of Public Input

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July, 2001

This is a summary of the public input received on the Timber Supply Review in the Lakes Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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Background

As part of the review of timber supply in the Lakes Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Lakes Timber Supply Area *Data Package* and *Information Report* in March 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Lakes TSA. A 30-day review period, ending April 6, 1999, was provided for the public to comment on these documents.

The B.C. Forest Service had planned to complete a timber supply analysis and release a new allowable annual cut (AAC) for the Lakes TSA before the end of 2001. However, due to the severe mountain pine beetle infestation, the Lakes Forest District asked the chief forester to carry out an immediate review of the AAC and consider a temporary AAC increase.

On March 22, 2001, the British Columbia Forest Service released the *2001 Lakes Timber Supply Area Analysis Report*. The public was encouraged to review and comment on the accuracy of the information in this document and to provide additional information during the 30-day review period that ended April 23, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the Lakes TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Lakes Forest District office.

Public Review Process and Response

Lakes District staff actively solicited public input on the Timber Supply Review in the Lakes TSA through the following actions:

- approximately 150 copies of the *Information Report*, *Data Package* and *Analysis Report* were mailed to stakeholders in the TSA, such as First Nations, licensees, local governments and the Land and Resource Management Plan resource council. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at the district office in Burns Lake and the regional office in Prince Rupert; approximately 30 were picked up.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media.
- on March 23, 1999, a presentation was made to a representative from Burns Lake Native Logging and from the Burns Lake Band. On March 30, a meeting was held with a representative of the Ulkatcho First Nation.
- on March 25, 1999, a presentation was made to five representatives of the Community Forestry Committee.
- on April 24, 2001, a presentation was made to representatives of the Village of Burns Lake, the Regional District of Bulkley-Nechako and the Community Economic Development Association.
- referrals were made to the Ministry of Forests website where documents were available to download.

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The Lakes Forest District received eight written submissions on the *Data Package* and 16 submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Lakes TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report
- Other comments

Data Package

Land Base Factors

The Lakes TSA Major Forest Licensee Interest Group (the licensees) comments on a number of factors that affect the size of the timber harvesting land base.

The licensees say the reductions for environmentally sensitive areas seem excessive and have nearly doubled since the previous Timber Supply Review. In particular, they express concern about sensitive soil reductions and caribou exclusions.

Since no land use decisions have been made for the Sutherland Valley and the Entiako area, the licensees say these areas should not be excluded from the land base for this analysis, but treated in a sensitivity analysis of the impacts of the Lakes Land and Resource Management Plan (LRMP).

With regard to the definition of sites with low growing potential, the licensees say a height threshold of 5.4 metres at 50 years seems low for spruce.

With regard to problem forest types the licensees make the following comments:

- the reduction in minimum height criteria for pine-leading types is significant and a sensitivity analysis is recommended.
- mixed balsam types older than 250 years should not be 100 per cent excluded because licensees have operated in some of these stands.
- deciduous volumes in coniferous-leading stands are excluded from harvesting but may overlap with exclusions for wildlife tree patches (WTPs).

With regard to deductions for roads, trails and landings, the licensees say there doesn't seem to be adequate consideration of road rehabilitation requirements, tree closure over roads and increased use of roadside harvesting systems.

Expected Rate of Growth

The licensees make the following comments on factors affecting estimates of managed stand volumes:

- initial stand densities of 2800 stems per hectare indicate an excessive amount of natural ingress; densities are closer to 2000 stems per hectare.
- the increase in the reductions in pine-leading stands to account for gaps in these stands is questioned.
- a rationale is needed for including stands less than 41 years old in managed stand yield calculations.

The licensees recommend a sensitivity analysis using culmination age (when annual growth is maximized) as the minimum harvestable age. The licensees also note that genetically-improved spruce seed has been used for some time and improved pine is coming on line. They say the Research Branch has

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documented significant productivity gains from genetic seed improvements.

Not-Satisfactorily Restocked Areas

The licensees question the 14 per cent reduction in Not-Satisfactorily Restocked Areas (NSR) to account for non-commercial cover (NCC). They say if the NCC patches are small and included in cutblocks, they may already be accounted for. If they are large and wrongly classified as NSR, then the reduction is appropriate.

Utilization Standards

The licensees note that initial results from the Babine Forest Products Enhanced Forest Management Pilot Project show actual stump heights to be lower than the current 30-cm utilization limit.

Wildlife

The submission from the licensees makes the following points regarding forest cover requirements for wildlife:

- the base case analysis should only consider high and very high value caribou migration corridor areas, similar to the previous Timber Supply Review (TSR1).
- the base case should only include moose and deer requirements used in TSR1.
- the very high value grizzly areas were identified during the LRMP and should only be considered as part of the LRMP sensitivity analysis.

Riparian Management

The licensees say a rationale is needed for the application of riparian reductions. They suggest the reductions be applied across the entire land base for the base case analysis and where reductions are focussed in Biological Ecosystem Networks (BENs), a sensitivity analysis should be carried out.

Unsalvaged Losses

The Forestry Committee of the Burns Lake & District Community Economic Development group (the Forestry Committee) says the *Data Package* does not provide a rational approach to estimating the volume of unsalvaged losses, and they provide details on what should be included. The committee says the information does not distinguish between endemic and catastrophic losses, or outline how these losses are accounted for. They say the opportunity to reduce unsalvaged losses through small-scale salvage operations must not be missed due to inadequate information.

Socio-Economic Factors

The Forestry Committee says if there is an increase in harvesting, every effort should be made to provide opportunities that increase and enhance local employment.

An individual tourism operator says if the current trend of pine beetle infestation and increased harvesting continues, there will be no opportunity for other forest users and, in particular, ecotourism will have no future. This individual says their 15-year-old tourism operation has already lost (to logging) 80 per cent of the area opportunities they used to have.

A submission from Nature Trails Wilderness Lodge says it is very important that the area surrounding their lodge remains intact, as they thrive on the ecotourism market, selling wilderness recreation packages and a remote, wilderness lodge. Areas of particular importance are noted, and the submission asks which areas are planned for harvesting.

An individual submission says cattle grazing must always be considered because beef cattle are a major, and increasing, part of the economy in many parts of the TSA.

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First Nations

The submission from the Yekooche First Nation raises the following concerns:

- the fact that the Yekooche First Nation was not recognized as existing in the TSA is further evidence of the district's lack of understanding, recognition or respect for Yekooche and their aboriginal title and rights.
- no part of the Timber Supply Review process considers their aboriginal title or rights, which have never been ceded or surrendered.
- the area between Lake Babine and Cunningham Lake is very important for many uses (hunting, trapping, gathering, ceremonies, trails and burials) and they strongly disagree with any forestry activities there.

Timber Supply Area Analysis Report

Existing Forest Inventory

Fraser Lake Sawmills says the worst case scenario for the mountain pine beetle (MPB) outbreak shows a “pinch-point” in timber supply from the third to eighth decades, but does not show the impact to the log profile. The company says the reduction in minimum cutting ages may not be realistic if timber must come from stands that barely meet the new minimum criteria for height, age and site index. The company also says the assumption that its operation will be viable with shorter, smaller logs is very optimistic.

Regeneration Delay

Fraser Lake Sawmills expresses the opinion that complete regeneration of unsalvaged pine stands may take as long as 20 years, not 10 years as used in the analysis. The company requests a sensitivity analysis using 15 years.

Utilization Standards

Fraser Lake Sawmills says utilization standards should be modified to provide incentives that ensure priority is given to harvesting the best quality beetle-infested stands before the poorer ones, as well as to harvesting the highest quality portions of infested stands first.

Non-Timber Values

The submission from the major licensee interest group (the licensees) notes that forest cover requirements are not applied in the first 10 years of the MPB scenario. They say the ability to remove these is questionable, both legally and in terms of the reaction of the environmental community (e.g., market boycotts).

Fraser Lake Sawmills says increasing the harvest level to three million cubic metres may not be possible if non-timber resource values must be managed to meet the objectives of the LRMP. The company says the MPB scenario assumes all constraints will be removed for the first decade and says unconstrained management is not a likelihood.

Beetle Infestation

An individual submission predicts that if harvesting does not keep up with the beetles, forest fires will sweep through, burning most of the forests and creating a sea of immature pine not available for harvesting for 80 years.

Several submissions question the concept of the “war” against the beetles, noting that some experts say beetles are a natural part of the cycle of the forest and are integral to forest ecology. These submissions question the evidence that logging infected areas is any solution to the MPB infestation. One submission says fire is the best tool. Others say that allowing natural processes to proceed will protect biodiversity (such as important old-growth attributes and wildlife habitat) and produce a more resilient future forest with the landscape-level complexity that helps keep beetle populations in check. Trials in

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retention harvesting are recommended by one submission.

The submission from the David Suzuki Foundation says salvage activities should be part of an ecosystem-based approach to beetle management that produces stand structures and landscapes that reflect the complexity of natural forests. Several recommendations are provided.

Socio-Economic Factors

Two submissions say the timber supply from the Lakes TSA is very important to the stability of the Village of Fraser Lake since a major employer, Fraser Lake Sawmills, derives more than half its licensed log supply from the TSA.

The licensees say the socio-economic analysis inappropriately assumes that doubling the harvest will double government revenue, noting the value of the timber resource will be reduced due to increased operating costs, poorer log quality and decreased product values. The licensees say appropriate timber pricing is critical to industry's ability to effectively deal with the infested volume.

Vanderhoof Specialty Wood Products says increasing the harvest level when demand for purchase logs is static will drive prices down further. The company says a reallocation of Small Business Program wood from other TSAs will provide the increased cut needed without harming the Section 21 value-added industry and small business loggers.

Another submission says the Lakes TSA is surrounded by other TSAs under attack by pine beetles, and federal and provincial planning must coordinate vast changes from a lumber and pulp economy to a more diversified wood product and wood energy economy.

Two submissions make the argument that doubling the AAC now will create a dependency on this wood supply and produce an economic falldown with associated job losses and negative community impacts in ten years. These submissions say the long-term economic outlook

is better if the forest is left unsalvaged because the natural forests will be more resilient and more able to support a diverse economy including both the timber and tourism industries.

Other Comments

All submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Ten submissions comment on aspects of the Timber Supply Review process itself. The comments include:

- it would have been prudent to await the results of the LRMP timber supply review before undertaking this one, so that any plan needed to mitigate a timber supply shortage could have been considered.
- it's good that opinions of people in the forest industry are being sought as in the past many decisions have resulted from pressure by environmentalists with no knowledge of the local situation.
- the LRMP does not constitute current management, and changes to timber supply resulting from the LRMP should be handled through sensitivity analyses and the results presented to the public so impacts can be clearly understood.
- the speeded-up process is not justified and the public consultation process is just window dressing.
- the Forest Service is to be commended for the thoroughness of the *Analysis Report*.
- the analysis does not include information and results from the Babine Enhanced Forest Management Pilot Project, some of which demonstrate significant upward pressure on timber supply.

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- there has been no public discussion about the long-term effects of increasing the AAC, such as what the forests will look like, what options are left for other forest users, etc.
- the proposed increase is simply a salvage proposal that matches the milling capacity of the region, not a coherent effort to control the present epidemic. Ecological or scientific criteria played a minor role in the analysis.

Apportionment

Six submissions comment on the issue of apportionment or allocation of the increased cut. The common concern expressed is that the allocation must give priority to local jobs, the local economy and community stability. Various strategies are suggested, including:

- establish a local working group to examine alternatives to transporting wood out of the local area (e.g., storing surplus timber).
- use non-renewable, short-term tenures rather than multi-year agreements that have less flexibility.
- encourage new manufacturing and marketing initiatives that have a solid plan to fully utilize dead and damaged timber.
- review operating area allocations at the same time as decisions are made to dispose of increased volumes.

Another individual submission says woodlot licences should be available to everyone living in remote areas, with stumpage kept as low as possible. The benefits, according to this submission, include job creation, keeping money in the region, improved wood quality, and protection of forest structure.

Harvest Levels

Nine submissions do not express support for an increase in the AAC or advocate a reduction to a sustainable level. The following reasons are offered:

- tourism and recreation opportunities will be diminished.
- the impact on the Entiako caribou herd may be devastating due to increased access for humans and predators.
- the current harvest level is both reasonable and sustainable, and there's no justification to double it.
- an increase will add to the supply of logs at a time of low markets.
- LRMP decisions were based on an AAC of 1.5 million cubic metres, and there was an assumption at the LRMP table that if a beetle epidemic occurred, any remedy would consider all values as being equal. Doubling the AAC would compromise the work of the LRMP table, set a bad precedent and erode public trust.
- creating an even-aged monoculture of pine plantations over the entire harvesting land base is a perfect setup for another, even greater infestation.
- lack of confidence that harvesting the beetle wood will stop the epidemic.
- loss of provincial revenues because of continued low stumpage rates for this wood.
- loss of old-growth wood needed for value-added products.
- lack of a sustainable plan, making operations ineligible for certification and possibly subject to market boycotts.
- other districts with beetle outbreaks will also request large AAC increases, resulting in a region-wide reduction in forest stewardship.
- various technical assumptions are questioned (e.g., reclassifying scenic areas to free up timber; continuous aging of old growth forests outside the harvesting land base; lack of adjustment for epidemic stem rust in plantations).

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Seven submissions express support for an increased AAC, generally to three million cubic metres, in order to reduce the effect of the beetle epidemic, minimize unsalvageable timber losses and return infested areas to restocked productive states as soon as possible.

Two forest industry submissions say the AAC should be flexible enough to ensure the harvest of all beetle-attacked trees even if the total AAC exceeds three million cubic metres. A progressive approach to increasing harvest levels is proposed by one of these submissions.

Appendix 1

Submissions received by the Lakes Forest District

Submissions received on the Data Package

First Nations

Yekooche First Nation

Forest industry

Lakes TSA Major Forest Licensee Interest Group

Local government

Burns Lake & District Community Economic Development

General public

Five individual submissions

Submissions received on the Timber Supply Analysis Report

Forest industry

Fraser Lake Sawmills

Lakes TSA Major Licensee Interest Group

Babine Forest Products Co.

Vanderhoof Specialty Wood Products (two submissions)

Lakeland Mills, John Casteel

Lakes Community EnviroWood

Local government

Village of Burns Lake

Village of Fraser Lake

Regional District of Bulkley-Nechako

Interest groups

Northern Ecology Watch, Judy Stratton

David Suzuki Foundation, Ronnie Drever, Research Coordinator

Cortes Ecoforestry Society, David Shipway, Secretary

General public

Three individual submissions