

# **Lillooet Timber Supply Area Timber Supply Review**

## **Summary of Public Input**

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This is a summary of the public input that has been received on the Timber Supply Review in the Lillooet 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

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As part of the review of timber supply in the Lillooet Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and three technical reports—the *Timber Supply Analysis*, the *Socio-Economic Analysis* and the *Timber Supply Analysis Addendum*, which was the result of a re-analysis to correct computer errors in the original analysis. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period which ended October 9, 1995. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Lillooet Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section, Public Input, summarizes the 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 Lillooet Forest District office.

## Public Review Process and Response

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

- direct mailout of copies of the *Discussion Paper* to over 400 organizations and individuals within the Lillooet Timber Supply Area and adjacent timber supply areas. The *Discussion Paper* included a response form that

readers were encouraged to complete and return to the district manager

- a standing offer to provide presentations on the timber supply review to interest groups
- three open houses advertised extensively through a direct mailout and the local newspaper
- local newspaper articles on the Lillooet Timber Supply Review

A total of 47 individuals attended the information sessions and open houses. The Lillooet Forest District also received nine completed response forms and 15 written submissions (see Appendix 1). The Cariboo Lumber Manufacturers' Association, which includes the major forest licensees operating in the Lillooet Timber Supply Area, reviewed the *Lillooet Timber Supply Analysis* and the *Socio-Economic Analysis* and also commissioned a consultant (Sterling Wood Group Inc.) to conduct an independent timber supply analysis. The resulting document, containing both the review and the analysis, is referred to as the "licensee analysis" in this report.

<b>Organizations (No. of participants)</b>	<b>Date</b>
<b>Meetings with interest groups</b>	
Economic Development Committee - Lillooet (7)	September 14, 1995
Local government & interested public - Goldbridge (13)	September 6, 1995
<b>Open Houses</b>	
Goldbridge (13)	September 6, 1995
Lillooet (24)	September 11, 1995
Lytton (3)	September 14, 1995

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*Table 1: Participation in public information sessions*

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## Public Input

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

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

None of the comments received were specifically directed at the *Timber Supply Analysis Addendum*. For this reason, all comments regarding technical aspects of the analysis are recorded in the *Timber Supply Analysis* section. Public input on other ongoing government processes that may influence the timber supply in the Lillooet Timber Supply Area in the future is summarized at the end of this section.

### Timber Supply Analysis

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#### *Licensee analysis*

The licensee analysis expresses concern that the information presented in the Timber Supply Review process highlights significant downward pressures on the AAC.

- **Land base**

The licensee analysis questions the land base used in the *Timber Supply Analysis*. It discounts the Forest Service concern that the timber harvesting land base may have been overestimated and claims that the exclusion of 50 per cent of the productive forest resulted in an underestimate of the land base. In particular, it states the land base reduction for roads, landings and trails is excessive and should be significantly less.

According to the licensee analysis, a significant portion of the areas removed from the land base were environmentally sensitive areas assumed to be inoperable or non-merchantable at the time of the analysis. The analysis asserts that much of this land is now operable due to new harvest technology.

In addition, not only will technology increase the operable land base, but the expense

of roads and the restrictions of the Forest Practices Code will result in less forested land lost to roads, landings and trails in the future. The analysis recommends a sensitivity analysis to examine a 20 per cent increase in the land base to account for the effect of these variables.

- **Forest cover requirements**

The licensee analysis suggests some forest cover requirements may be satisfied by the 50 per cent of the forested land base considered unavailable for timber harvesting. It contends that the contribution of these areas has not been recognized, except in the case of the visually sensitive areas. Forest cover constraints should have been adjusted for the gross/net area ratio in the analysis.

In addition, the licensee analysis asserts that due to the size of the land base reductions, measures to account for retention of old growth and extended green-up periods are unnecessary. Indeed, intensive forestry will reduce regeneration delays in the future. It also suggests that the removal of 50 per cent of the land base may compensate for the 18 additional community watersheds identified since the release of the data package.

The analysis also questions the viability of a five-pass harvest system, considering the current land base deferrals. It asserts that, due to the topography and fragmentation of the Lillooet Timber Supply Area, a two-pass system may in fact be the most common reality. Furthermore, the use of five-pass harvesting systems in the forested types typically found in this timber supply area will be detrimental to maintaining healthy and vigorous stands.

Finally, the analysis states that the visual quality objectives in use have not undergone public review and may not be representative.

- **Existing volumes**

The licensee analysis contends that the existing inventory may underestimate mature volumes. In its view, base case stand volumes appear dramatically low. It states there are dramatic changes in timber supply projections if the

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mature volumes are estimated to be 20 per cent higher than the base case scenario. The uncertainties around this issue should be resolved prior to establishing the harvest level.

- **Other issues**

The licensee analysis contends the methodology used to model past mountain pine beetle infestations may not accurately represent the age class of these forests

The deferral of the Mid-Stein and Spruce Lake has caused polarization of opinions and a high degree of uncertainty in the forest industry. The analysis recommends these issues be resolved through a public process prior to a reduction in the allowable annual cut.

The analysis adds that the method of assessing selection management should be addressed in future Forest Service analyses.

The licensee analysis concludes that the current harvest level can be maintained in the short term without affecting the long-term harvest level. It recommends maintaining the current harvest level for five years in order to facilitate a public process to resolve outstanding land-use issues.

## *Ministry of Environment, Lands and Parks Submission*

- **Biodiversity**

The Ministry of Environment, Lands and Parks states that neither landscape or stand-level biodiversity have been addressed in the analysis. It claims stand-level biodiversity will have an immediate impact on the short-term timber supply.

- **Old growth**

The submission also notes that according to the base case scenario, less than four per cent of the timber harvesting land base will be old-growth forest in 200 years. It claims this does not meet either the Old-Growth Strategy or Forest Practices Code old-growth objectives. The submission maintains the old-growth sensitivity analysis is a better strategy to maintain old-growth attributes.

- **Community watersheds**

Ministry of Environment staff express concern about the 18 additional community watersheds identified in the timber supply area since the release of the data package. (13 have since been officially designated.) Their submission notes that this results in an additional 24,000 hectares of community watershed that were not factored into the base case scenario.

- **Riparian areas**

The submission contends that riparian areas and fisheries values were not factored into the analysis. It maintains that Forest Practices Code regulations will impact the short-term timber supply. Further timber supply reductions may be necessary to account for green-up within watersheds with fisheries value.

- **Wildlife habitat**

The Ministry of Environment submission claims that ungulate winter range, grizzly bear habitat and endangered species habitat have not been adequately modelled in the timber supply analysis. It suggests that although the forest cover constraints applied address the requirements of some species, habitat for mule deer, moose and grizzly bears is not covered. A number of suggestions are provided as to how habitat for these species should be modelled. Concern is also expressed about the possible impact of helicopter logging and other non-conventional logging methods on mountain goat winter range.

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## **Socio-Economic Analysis**

### *Employment and community impacts*

The licensee analysis asserts that forestry employment is underestimated, due to the use of person-years. It states that the use of person-years assumes many forest sector jobs are part-time or seasonal and therefore provide lower annual wages. In fact, the higher wages paid by the forest sector more than offset the seasonality of these jobs. The submission recommends actual "jobs" as a more suitable unit for this analysis. Further, the use of 1993 dollars throughout the *Socio-Economic*

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*Analysis* underestimates the importance of the forest sector.

Another submission claims that employment figures in person-years are misleading.

The licensee analysis provides additional information on the timber supply area employment profile. Based on records at Ainsworth Lumber Co. Ltd., Lytton Lumber Ltd. and JS Jones Ltd., it states that a large portion of company employees are of a "younger age" and 27 per cent are of aboriginal ancestry.

The Lillooet Select Economic Development Committee suggests that the effect of a reduction in allowable annual cut on timber supply area employment is not fully recognized in the Socio-Economic Analysis. It also criticizes the assumption that a reduction in cut would have no effect on local Ministry of Forests employment. Rail transportation, hydroelectric generation, school districts, police, health services and many small businesses would also be impacted by a reduction in harvest levels.

The committee claims some of the opportunities to offset job loss considered in the analysis are not viable because:

- the future of Melvin Creek Ski Resort is uncertain
- tourism and outdoor recreation provide only seasonal employment
- unless more fibre can be secured, expansion of remanufacturing industries is unlikely

In contrast, other submissions criticize the relationship assumed in the *Socio-Economic Analysis* between a decrease in the allowable annual cut and job losses. These submissions claim that job losses will occur regardless of whether the allowable annual cut is reduced, due to technological change and the transport of timber outside of the district for processing.

Submissions from the Goldbridge area stress the importance of tourism and outdoor recreation to their economy. A number of submissions raise concerns about the impact of harvesting on tourism, and one suggests the *Socio-Economic Analysis*

should have examined the effect of forestry activities on communities with tourism-based economies. Other submissions claim that although forest-related employment exists in the Goldbridge area, most jobs are filled by residents from outside the community.

## *First Nations impacts*

Three submissions comment on the assessment of impacts on First Nations in the *Socio-Economic Analysis*. One submission contends that the projected impacts of a reduced harvest level on First Nations are disproportionate to the impacts projected for non-native communities. It contends the impact has been overestimated, as the number of First Nations people involved in the workforce is small compared to the total community population. It further suggests the impact of harvesting on the environment and traditional use of the forests is more significant to the Nlaka'pamux Nation than jobs that may be lost with a reduction in cut.

Other submissions claim that the distribution of First Nations should have been considered in the impact assessment. One First Nation criticizes the analysis for addressing all three nations—St'at'imc, Shuswap and Nlaka'pamux—as a single entity, while the communities of Lytton, Lillooet and Goldbridge are assessed separately. Submissions suggest that few economic benefits from forestry activities will be derived by Shuswap or Nlaka'pamux people in the future because the majority of available timber is located in St'at'imc territory.

Another submission criticizes the analysis for considering only the monetary value of the forest resource. The submission asserts traditional activities such as hunting, fishing and berry picking do not involve monetary exchange and are not adequately reflected in the analysis. It recommends a more comprehensive analysis of these activities be undertaken in consultation with First Nations communities.

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## *Population*

Two submissions comment on the timber supply area population. One states that the population figure for Lillooet in the *Socio-Economic Analysis* is inaccurate. According to 1991 data, the population is 6,970 rather than 5,680 residents. The submission suggests that populations on the outskirts of town were excluded from the figure used in the analysis. A more detailed population analysis in conjunction with the Lillooet Economic Development Office is recommended.

Another submission asserts that the timber supply area profile does not recognize the many seasonal residents who contribute to the local economy.

## **Discussion Paper**

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Several issues raised in the *Discussion Paper* prompted public input.

### *Land base and land base deferrals*

The licensee analysis disputes the description in the *Discussion Paper* that timber on areas deducted from the land base in the *Timber Supply Analysis* is not suitable to harvest. It claims that much of it is very suitable for harvest but is not available due to resource management decisions and that the *Discussion Paper* used an unfortunate and deceptive choice of words.

A number of submissions comment on the Mid-Stein and Spruce Lake land base deferrals that have been in effect for the last 20 years. Seven respondents suggest that these areas should not have been considered part of the timber harvesting land base in the timber supply review because they are not currently available for harvest. One submission criticizes the analysis for not accurately portraying the effect that these deferrals have had on the timber harvesting land base.

The Ministry of Environment, Lands and Parks submission notes that past harvesting has been concentrated in areas with no land-use conflicts. Many of these areas have exceeded first pass and have not greened up sufficiently to maintain wildlife, fisheries, hydrological values or the more stringent adjacency requirements of the Forest Practices Code.

These factors are having a significant impact on attempts to meet the present AAC. The submission goes on to suggest that logrounds and deferrals are factors that must be considered to ensure cutting permits comply with adjacency, green-up, fisheries and wildlife issues.

Another submission expects the deferred areas to eventually become protected areas, leading to a decrease in the harvesting land base. Another respondent contends that regardless whether there is a decrease in cut, the land base will become smaller due to both the Protected Areas Strategy and the implementation of a five-pass harvesting system.

### *Community watersheds*

A number of submissions stress the importance of protecting community watersheds. One suggests that watershed restoration should be the highest priority in forest management.

Five submissions comment on the water quality of Gun Lake. It is asserted that the volcanic ash found in the soil around the lake makes harvested areas subject to erosion. The submissions state that Gun Lake provides drinking water for over 200 residents and recommend it be given community watershed status. In contrast, another submission claims there is a misunderstanding about the harvesting in the Gun Lake area. The submission maintains that Forest Practices Code standards are being met.

The Cook's Ferry Band claims that many watersheds significant to the band do not meet community watershed requirements. The Siska Indian Band is concerned with the condition of the Siska watershed and request a moratorium on harvesting in this area until further ecological studies are undertaken. Both submissions recommend managing watersheds as separate units in order to protect environmental values.

### *Visually sensitive areas*

Eight respondents comment on visual quality in the Lillooet Timber Supply Area. Three express concern with the visual quality around Gun Lake, calling Green Mountain an "eyesore." The respondents worry that harvesting is having a negative effect on the tourist industry. One respondent stresses the

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importance of achieving a balance between harvesting and other values around Gun Lake.

A submission from the Bridge River Valley Chamber of Commerce recognizes the need to address the current beetle infestation at Carpenter Lake but suggests harvesting these areas by means of selection or high-lead systems to maintain visual quality.

Other submissions mention the importance of protecting visual quality in recreation areas around Downton Lake, along Highway 40 and other highly visible parts of the timber supply area. The Ministry of Small Business, Tourism and Culture recommends site-specific planning considerations be considered in order to protect visual quality and backcountry tourism.

## **Environmental Impacts**

Submissions from the public stress the importance of protecting old growth, biodiversity, wildlife and fisheries values. One submission states that before the AAC is determined, riparian buffer zones, linkage corridors, critical habitat and buffer zones around protected areas need to be designated and ecologically managed to ensure connectivity among important biological resources.

Another submission criticizes the Timber Supply Review for not taking measures to account for unrecognized environmentally sensitive areas. It is recommended that further work be undertaken to develop a method for addressing biodiversity, watershed assessment and environmental protection. A First Nations submission asserts that the long-term harvesting impacts on the fisheries resource also need to be examined.

In contrast, the licensee analysis questions statements in the *Discussion Paper* to the effect that continued harvesting will have significant impacts on old growth and biodiversity. The submission contends these statements ignore the 50 per cent of the land base that won't be harvested.

The licensee analysis also criticizes the connection made in the *Discussion Paper* between harvesting and the disruption of linkage corridors

between seasonal wildlife habitat. This is described as "pure speculation."

A number of submissions comment on the environmental impacts of harvesting. One submission states that the Lillooet Timber Supply Area is being overcut by 100 per cent. Another asserts that hillsides within the timber supply area are not being stabilized prior to logging, causing erosion and affecting drainages. Other submissions recommend more harvesting regulations for private land. One submission suggests harvest opportunities be awarded on the basis of good forest practices.

## ***Timber Supply Review information***

Six submissions express concern over whether the information for the timber supply review is accurate or complete. One submission states it is not evident in the *Discussion Paper* whether the inventory of forest types from the most recent 1993 aerial photos was used in the analysis.

A First Nations submission suggests that the Timber Supply Review information is presented in a manner biased towards maximizing the cut. It claims the 120-year horizon examined in the analysis is inappropriate because all the variables considered will change in that time frame.

Contrary to this, the licensee analysis maintains the information presented in the timber supply review highlights significant downward pressures on the allowable annual cut.

Another submission contends that the pulpwood agreement should have been included in the allowable annual cut figures presented in the *Timber Supply Analysis*. The allowable annual cut totals 675,000 cubic metres per year when this is taken into account.

## ***Salvage programs and unsalvaged losses***

One submission argues that the Timber Supply Review used insufficient margins to account for losses due to natural disaster.

Two submissions stress the importance of salvaging damaged or diseased wood. Another contends allowances should be made for the removal of dead wood from areas adjacent to cut blocks prior

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to green-up, to prevent wastage. Another submission recommends the allowable annual cut be flexible in order to account for blowdown, insect infestation, disease and fire.

One submission asserts the Ministry of Forests did not respond effectively to a recent insect infestation and fire situation. Another states salvage programs need to be targeted to smaller areas affected by insect infestations.

## *Silvicultural systems*

Two submissions recommend alternative harvesting systems be promoted, with specific areas used as pilot projects for eco-forestry techniques.

Two submissions support the use of selection management. It is suggested more timber can be produced per hectare through selection management. Another submission claims selection management is preferable to clearcut systems because there is no green-up period prior to harvesting adjacent stands. It states rotation periods would be shorter with selection management.

## *Secondary manufacturing*

One submission asserts the focus in forestry should be to develop secondary manufacturing industries in conjunction with the use of botanical forest products. Another contends secondary manufacturing could offset job losses in the forest sector.

## *Woodlots*

The Bridge River Chamber of Commerce states more woodlots would help sustain employment in the forest sector. Another submission comments that as more woodlots are created in response to local demand, the lower rates of harvest/hectare, relative to current clearcutting systems, necessitate reducing the harvest base numbers.

## *Allowable annual cut adjustment*

Many submissions comment on whether and how the allowable annual cut should be adjusted. This input varies from two suggestions to maintain the current harvest level, to 11 suggestions supporting immediate reductions. Two other submissions state it would be a mistake to maintain the current level of harvest. Reasons given for reducing the allowable

annual cut include protecting tourism, accounting for the land base and mature volume uncertainties, protecting biodiversity and environmental values, and protecting aboriginal land interests. Most of the input agrees that a reduction to the allowable annual cut is inevitable. Several alternative ways to implement a reduction are provided:

- one submission recommends a constant harvest level of 400,000 cubic metres per year to provide stability within the industry
- two submissions suggest an immediate reduction as outlined in Scenario Two of the *Socio-Economic Analysis*
- one submission suggests an immediate reduction to 350,000 cubic metres per year
- one suggests a one per cent per year reduction, stating it would be less disruptive
- another submission recommends setting the harvest level at 585,000 cubic metres per year for the next three decades, followed by an eight per cent per decade decline before reaching the long-term harvest level of 351,000 cubic metres per year in 80 years

A number of submissions contend that the Mid-Stein and Spruce Lake areas should be excluded from the timber harvesting land base when determining the allowable annual cut, or else overharvesting of other areas will result. One submission recommends that the land base be immediately reduced by 20 per cent and a five-pass harvest system implemented.

The licensee analysis and the Lillooet Select Economic Development Committee acknowledge that the current harvest level cannot be sustained indefinitely, but suggest maintaining the current allowable annual cut for another five years. They assert this will not affect the short or long-term harvest levels and it will allow local communities time to address land-use planning issues and develop economic strategies. The licensee analysis maintains that the current allowable annual cut provides a critical volume of fibre for timber supply area mills. Both submissions predict that an immediate reduction would be devastating to the Lillooet economy.

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A number of submissions suggest how to apportion a reduced allowable annual cut. One submission notes that operating areas may need to be reviewed in the event of a reduction in cut. The submission also suggests that operability lines be reconsidered due to the more frequent use of new harvesting technologies such as helicopter logging in the timber supply area.

## **Related processes**

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Comments on other ongoing government processes in the Lillooet Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

### *Protected Areas Strategy*

The land base deferrals to accommodate Protected Areas Strategy study areas are of significant concern to timber supply area communities. Currently, 28 per cent of the timber supply area is under deferral, which has significantly impacted forest management in the area. Submissions received indicate that it is time to resolve these issues. Some suggest that the local public must be given the opportunity for input on the future of these areas.

### *Community Resource Board*

A number of submissions advocate that the newly formed Community Resource Board in Lillooet be given the opportunity to resolve outstanding land-use issues. The licensee analysis suggests that the Community Resource Board could be utilized in a Land and Resource Management Planning process. However, the Southern Chilcotin Mountains Wilderness Society is concerned whether the Lillooet Community Resource Board has representation for wilderness conservation, tourism and recreation interests.

### *Treaty negotiations*

Local First Nations request that traditional areas be recognized in setting the allowable annual cut. One recommends they be treated in the same manner as protected areas. Another submission indicates treaty settlements are not expected to adversely impact the allowable annual cut.

### *Forest development plans*

Two submissions recommend that forest development plans cover a 20-year horizon rather than five years. One states that all licensees should be required to display their plans together in order to provide a more complete and comprehensive outlook.

### *Forest Renewal BC*

One submission emphasizes the need to focus the economy on restoration of forest land through Forest Renewal BC. It states this may provide economic gains to small business. The submission recommends this be initiated before timber supply is jeopardized.

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## **Appendix 1**

### **Submissions received by the Lillooet Forest District**

#### **Government agencies**

Ministry of Environment, Lands and Parks, Habitat Protection Section,  
Southern Interior Region

Ministry of Small Business, Tourism and Culture, Inventory and Resource Planning Unit,  
Williams Lake

#### **First Nations**

Cook's Ferry Band, Spences Bridge  
Cayoose Creek Band Council, Lillooet  
Lytton First Nation, Lytton  
Siska Indian Band, Lytton

#### **Industry**

Cariboo Lumber Manufacturers' Association, Williams Lake ("licensee analysis": timber supply analysis  
prepared by Sterling Wood Group Inc.)

#### **Interest groups**

Lillooet Select Economic Development Committee, Lillooet  
Bridge River Valley Chamber of Commerce, Gold Bridge (2 submissions)  
Southern Chilcotin Mountains Wilderness Society, Gold Bridge (2 submissions)

#### **Individuals**

3 written submissions  
9 completed discussion paper response forms

