Prince George 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 Prince George 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.

Prince George Timber Supply Area

Background

As part of the review of timber supply in the Prince George Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports—the *Timber Supply Analysis* and the *Socio-Economic 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. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Prince George 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 Fort St. James, Prince George, or Vanderhoof Forest District offices.

Public Review Process and Response

Staff from the Fort St. James, Prince George and Vanderhoof Forest District offices actively solicited public input on the Timber Supply Review in the Prince George Timber Supply Area through the following actions:

- copies of the *Discussion Paper, Timber Supply Analysis* and *Socio-Economic Analysis* were made available at the district offices and at all open houses. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager
- open houses were held in Fort St. James, Prince George and Vanderhoof (see Table 1)
- comments on the data package for the timber supply analysis were solicited from the forest industry, interest groups, government agencies and First Nations bands
- newspaper articles were encouraged

As Table 1 shows, 291 individuals attended the information sessions and the open houses. The Forest Service district offices also received six completed response forms and 23 written submissions (see Appendix 1). Many articles editorials were written in the local newspapers.

Organizations (No. of participants)	Date
Elected officials	
Members of Legislative Assembly (2)	March 13, 1995
Member of Legislative Assembly	March 17, 1995
Meetings with interest groups	
Industry Representatives	
Fort St. James (4)	March 10, 1995
Prince George (14)	March 30, 1995
Vanderhoof (12)	March 21, 1995
Land and Resource Management Plan Working Group (37)	March 11, 1995
Forest Service District Staff	
Fort St. James (21)	March 15, 1995
Prince George (130)	April 3, 1995
Vanderhoof (20)	March 20, 1995
Open Houses	
Fort St. James (18)	March 15, 1995
Prince George (29)	March 30, 1995
Vanderhoof (6)	April 11, 1995

Table 1: Participation in public information sessions

Public Input

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

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

Public input on other issues or ongoing government processes that may influence timber supply in the Prince George Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Inventory

Concern is expressed in one submission over the reliability of the inventory, which dates from 1963 to 1976 with only a small portion from 1990. It is suggested that most high-elevation spruce-leading types in the Fort St. James District have converted to balsam-leading.

Timber harvesting land base

Several submissions include specific comments on geographic areas to leave in or out of the timber harvesting land base.

One submission questions the inclusion of ownership code 69 land ("Crown-Miscellaneous Reserves, with or without Order In Council"). The author suggests that, if included, it should be for the first rotation only.

One respondent writes that the area inclusion factor for immature stands should be higher than for mature stands because old-growth stands are netted down heavily due to deterioration, which does not occur in immature stands.

According to forest industry comments, portions of the following should have been included in the land base:

- mixed coniferous types classified by inventory as cedar- and hemlock-leading that may have significant volumes of spruce, fir or balsam
- deciduous-leading stands that may have significant coniferous volume or may have become coniferous-leading over time or will in the future become coniferous-leading

One forest industry submission contends that leaving deciduous forest types out of the analysis results in a significant underestimate of the long-term timber supply. More than 290,000 hectares of deciduous forest that were not affected by other constraints should have been included in the timber harvesting land base.

Another submission states the reason some forest types have not been harvested is that companies have been required to harvest beetle-attacked stands. Concern is expressed that if these types are left out of the land base it may lead to the false assumption that they are available for an "opportunity wood" licence.

Several submissions maintain the economically operable volume thresholds for inclusion in the timber harvesting land base are too high in the current market and should be reviewed. One submission comments that the Forest Service has not required licensees to harvest any particular site or types and therefore lacks an objective measure of what licensees will or want to take.

A forest industry submission contends that over 1,000 hectares classified as inoperable because of poor site quality actually contain a mixture of site classes and should be included in the timber harvesting land base.

One respondent writes that operability should be defined by physical factors and that economic operability should be dictated by market conditions. Another one recommends a new assessment of operability limited to soil and topographic conditions be done before any operability constraints are applied in additional planning for the Prince George Timber Supply Area.

A forest industry submission contends the delivered-wood-cost concept should not be used in the analysis. Stands that are unmarketable because of high wood-delivery costs will not remain that way—just as stands that were marginal in the past have become marketable with today's prices.

Another forest industry submission states the per cent reduction for future roads should be at levels comparable to experienced levels —approximately four per cent.

Site Productivity

One forest industry submission contends the classification of overstocked pine stands of the Tagai Fire as low site does not reflect the growth potential of those sites.

Growth and yield predictions

Forest industry input maintains the Variable Density Yield Prediction model overestimates volume in stands 150 years and older and underestimates volume in stands 70 to 120 years old. The comments are based on a study done by a consultant comparing the Variable Density Yield Prediction model estimates to actual permanent and temporary sample plot volumes. The shape of the curves developed from the Variable Density Yield Prediction model estimates usually results in much higher culmination ages than would be indicated by curves with a shape that fits the data better.

Another forest industry submission expresses concern the Variable Density Yield Prediction model does not predict declines in stand volumes past the age of 150. The author has observed stands start losing volume after that age. Since the Prince George Timber Supply Area contains significant amounts of pine types over 100 years old, for which the timber supply projections give no information as to the expected harvest ages, the author asks whether this might impact timber supply projections.

One respondent states it appears the managed stand yields forecast by the Table Interpolation Program for Stand Yields model—on which the long-term harvest level is highly dependent—will only be achieved at the expense of other forest values, i.e. through intensive management for timber values only.

Another forest industry submission asserts substantially increased growth rates are being achieved as a result of basic silviculture practices and further increases will be seen from intensive silviculture treatments under the Forest Renewal Plan. Another important aspect of this faster growth rate is that green-up periods between harvest passes will be shorter than predicted.

One respondent writes that the most detailed study of regenerated stands in the Interior indicates timber supply in regenerated stands is much lower than in natural stands.

Adjacency

One submission asserts the adjacency requirements are critical because a seven-pass system would mean a significant decrease in the harvest level, whereas a four-pass system would permit the base case harvest level. It is suggested that even a four-pass system has faults in that more mature timber that is susceptible to insects and disease is left standing.

Two submissions state the procedure for modeling adjacency constraints is unrealistic because a four-pass system is not equivalent to a maximum non-greened-up denudation of 25 per cent. One author writes that all multi-pass systems have higher proportions of the area harvested in the first pass. Because of past harvesting, the most critical time for meeting the maximum denudation constraint is in the first decade, when a higher percentage denudation should be used. Although many areas are planned on a three-pass harvest system, the analysis uses a four-pass system. (Two submissions on the data package support the use of a three-pass system.) The submission further asserts that suggestions that a seven-pass system should be considered are absurd because of the long rotations that would result. There is no biological evidence timber stands in the Prince George Timber Supply Area live much beyond 250-300 years, and at that age, mortality and decay have reduced the volume substantially.

Green-up and other forest cover requirements

A comment on the data package asserts the green-up requirements should include specifications on the numbers and health of the young trees. The author recommends no logging in adjacent areas if regeneration presents any kind of problem.

Another data package comment contends tree heights of up to 10 metres are necessary to avoid watershed level impacts. The forest cover requirements for watersheds used in the analysis may therefore contribute to an overestimate of timber supply.

Wildlife
A data package comment expresses concern that the wildlife cover requirements will create large reserves of over-mature timber that will incur significant losses through decay and mortality.

One respondent writes that not enough area was subtracted from the timber harvesting land base for caribou habitat.

Unsalvaged losses
One data package submission voices concern that the estimate of losses due to wind in the Fort St. James Forest District is too low. Another states the estimated losses for insects are too high.

Utilization
Two forest industry respondents state increases in utilization should be considered.

Managing other resources
One respondent voices concern that the implications of maintaining biodiversity to sustain the forest ecosystems—a basic goal of the Forest Practices Code—do not appear to have been satisfactorily taken into account. The following comments are made:

- the need to constrain harvesting in the forest ecosystem networks in each landscape unit is not mentioned
- only a one per cent reduction in timber supply is assumed to result from protecting riparian corridors
- there is an assumption that old-growth requirements for maintaining biodiversity will be met by timber in areas not included in the timber harvesting land base.

A forest industry submission points out that if management of a percentage of our future forests for old growth is to occur, then some second-growth stands must be allowed to grow well beyond culmination age. It is noted Figure 14 in the *Timber Supply Analysis* shows very few stands will be older than 120 years in the long term. If all stands are harvested at culmination age, then simply protecting some of today's old stands will not allow for any future old growth.

An individual submission mentions the riparian reduction of one per cent seems conservative.

A number of comments on the data package were received on visual quality objectives. Two respondents question why the Highway 97 and Highway 16 viewsheds did not have visual quality objectives. Forest industry input asserts that in viewscapes dominated by mature stands of age classes 7, 8 and 9 and in which there is a five per cent recommended denudation, the resulting 20-pass system is unacceptable.

Another forest industry submission states there is no allowance in visually sensitive areas for the use of non-clearcut harvesting methods. It also recommends a middle approach be used, due to uncertainty around the visual quality objectives.

Another submission voices concern over the possibility of discrepancies between the analysis results and operational planning due to the method of locating management zones by the proportional distribution of planning cells. It is suggested that digitizing the management zones would eliminate the possibility of this type of error.

Socio-Economic Analysis

Employment and community impacts
One submission contends the *Socio-Economic Analysis* ignores the tourism component of many small rural communities that depend upon the scenery of forested mountains for tourism.

One labour submission and one forest industry submission state an increased allowable annual cut would generate additional employment throughout the Prince George Timber Supply Area. Those communities heavily dependent on the forest industry for employment would benefit considerably.

In contrast, another submission asserts increasing the allowable annual cut will not necessarily impact employment. Noting that the forest industry in the Prince George area is one of the most efficient in the province and that the number of people employed in the sector has decreased significantly over the last decade, this submission questions whether or not any additional jobs would result from an increase in the allowable annual cut.

Labour, forest industry and business submissions maintain the *Socio-Economic Analysis* underestimates the impact of the harvest level on employment in the Prince George Timber Supply

Area. In place of the Forest Service provincial average multiplier for indirect and induced employment, which they state is too low, the respondents recommend a higher multiplier based on an October 1994 Price Waterhouse report titled, *Prince George Timber Supply Area-Economic Value of the Forest Industry*. The submissions assert this report presents a much more comprehensive and accurate representation of the forest industry and its impact than is depicted in the *Socio-Economic Analysis*. The forest industry submissions state employment in the support/service sector and in the Forest Service and Ministry of Environment, Lands and Parks, is directly linked to and affected by the forest industry and its harvest levels.

A combined forest industry/business submission maintains the chief forester should not consider the timber supply area in isolation; rather, he should look at broader socio-economic impacts and changes, beyond those presented in the *Socio-Economic Analysis.*

Environmental impacts

The Ministry of Environment, Lands and Parks submission acknowledges most animal populations are in a reasonably healthy state, but warns the general viewpoint is that maintaining or increasing the current harvesting levels would negatively impact some species.

A community submission states wildlife, old growth and biodiversity considerations are not addressed by scenarios that suggest increases to the annual harvest level. It cites a growing concern over soil hydrology within the region. Accelerated harvesting and the subsequent loss of moisture retention is a threat to domestic water supplies and wildlife and fisheries values.

One submission contends old-growth preservation concerns and the increased pressure on wildlife due to fragmentation of the area will be alleviated by the Protected Areas Strategy and the Land and Resource Management Planning process. Losses from these initiatives can be mitigated with intensive silvicultural practices and increased operability in difficult terrain and sensitive areas.

Corrections

Two typing errors are noted in the *Socio-Economic Analysis*. Page v of the executive summary states "$38.5 million in provincial stumpage, income tax and general tax..."; the correct figure is $380.5 million, as per Table E.2 on page vi and in the *Discussion Paper*. On page 98, "Jack Cooper, Manager, Prince George Chamber of Commerce" should be "Jack Hooper, Manager, Prince George Tourism."

The third paragraph on page 41 is worded inaccurately. The suggested replacement should indicate the great majority of visitors were en route to Alaska and the Yukon, with 53 per cent from B.C., 26 per cent from the USA, 12 per cent from the rest of Canada and 8 per cent from off-shore.

Discussion Paper

Environmental and socio-economic impacts

A community group states its expectation that the chief forester will consider the importance of protecting and preserving natural values within the timber supply area, and that a fair and representative measure of these same values will remain intact for future generations.

Six individual submissions and one community submission call for diversification of the economies of communities in the Prince George Timber Supply Area. Emphasis is placed on development of both value-added industry and tourism. It is suggested lower harvest levels will allow greater development of both industries.

Two forest industry submissions express concern about regional disparity, noting the economic hardships faced by some communities when fibre extracted in one district is removed and processed elsewhere. An example cited is the Fort St. James District, where local facilities have curtailed operations and reduced employment while resources are transported away for processing by larger out-of-district companies. Both submissions call for careful consideration of the impacts of harvesting policies on resource-dependent communities within individual districts, to ensure their survival and prosperity prior to the removal of any fibre from their district.

A labour submission supports the processing of timber within the Fort St. James and Vanderhoof districts so long as it does not seriously conflict with the economies of scale offered by processing facilities in Prince George.

One labour submission quotes Minister of Forests Andrew Petter as saying, "Our responsibility goes well beyond science," and declares his words an important acknowledgment that should be heeded by the chief forester in his determination of all allowable annual cuts in the province. A community submission maintains the chief forester should determine an allowable annual cut that will not limit future employment options and diversity. One individual cautions against the use of "person-years of employment" in justifying policy.

A labour submission stresses the importance of the "culture" of forestry to provincial resource-providing communities. Culture is described as an "intangible element," but one equally as important as visual quality objectives, for instance." Accordingly, the submission asks that the allowable annual cut be considered carefully in view of its impact on the viability of small resource-providing towns and on northern British Columbia's culture.

Practices to protect non-timber values

One respondent contends timber supply forecasts are not sensitive to green-up, adjacency and visual requirements, and that this has significant positive implications for managing other resources such as wildlife, fisheries, water, biodiversity and recreation. This type of flexibility is important in trying to achieve sustainable economies, communities and environments.

Another submission maintains that because of the Forest Practices Code's authority to regulate access, increased harvesting will not create more access problems. The respondent writes that with the development of land and resource management plans that address all interests, and with Forest Service and Ministry of Environment, Lands and Parks enforcement, access can be managed.

One respondent declares the Timber Supply Review presents a somewhat misleading baseline because it takes no account of other ongoing processes and because it assumes a 20 per cent increase from second-growth stands through intensive management for timber only.

Another submission lists a number of non-timber values in the timber supply area. It questions whether enough lower-elevation old growth has been excluded from the timber harvesting land base to meet fish, wildlife, recreation and biodiversity needs.

Harvest distribution

A forest industry submission expresses concern over the uneven distribution of harvesting in the region, due to land-use planning processes and the under-utilization of some areas within the timber supply area. It states that attempting to negate regional shortfalls by over-harvesting in any one district is neither acceptable nor responsible. Instead, the forced introduction of alternative harvesting and milling techniques would likely assist in reducing the looming fibre shortage and allow time for some of the unknowns to be resolved.

Number of harvest entries

One submission declares the potential increase in small blocks in the lower-elevation interior plateau as a result of the new Forest Practices Code is a concern. Too many small blocks may result in landscape fragmentation, additional roads and excessive numbers of harvesting passes. Instead, the author proposes trying to copy more closely the natural processes of disturbance resulting from large fires. This implies larger blocks, with generous leave islands and peninsulas comprising a broad cross-section of trees (not just black spruce swamps), adequate "waste" fibre left on the ground and regeneration managed for biodiversity to avoid sterile pine stands such as those in Europe.

Harvesting forests that have been uneconomical to harvest

Cedar and hemlock forests

One submission recommends the Forest Service consider some type of incentives for the forest industry to use the older cedar and hemlock stands that are not included in the timber harvesting land base and to gradually return these stands to a healthy forest. The author asks whether the fibre from those old stands would be suitable for the proposed cogeneration and medium-density fibreboard plants in Prince George.

Deciduous
One submission states deciduous forests should be used for timber with caution because many species rely on them.

Milling capacity
In reference to Section 7 (c) of the *Forest Act*, one submission questions whether sustainability can be achieved in the long term if the allowable annual cut must be kept high in order to satisfy not only existing over-built mills, but also proposed processing facilities.

Another submission emphasizes pulpwood supply and demand should be taken into account by the chief forester in making his determination although they were not included in the analysis. Because of the potential effects of pulpwood harvesting on the long-term wood supply, biodiversity and other non-timber values in forested areas—e.g. wildlife and recreation—it is essential that sound practices of forest management be followed in these areas. In addition, the effect of their utilization on the regional economy should also be considered.

Forest management practices
One individual comment pertains to the statement in the *Discussion Paper* that "Compared to many other timber supply areas and the province as a whole, the forest in the Prince George Timber Supply Area has a very balanced age distribution." The respondent declares that with the liquidation of mature forests there won't be a very balanced age distribution for long. This will result in a detrimental impact on some plant and animal species. It is suggested longer rotations would help alleviate the impacts.

Another individual writes that closer attention should be paid to the economics of harvesting and regenerating higher-elevation forests and to the alternative values of the sub-alpine zones. It is suggested limited block sizes and elevation limits to harvesting should be considered. Higher-elevation harvesting should proceed slowly until we better understand the ecology of the sub-alpine forest and have acquired many years of experience with experimental harvesting methods and regeneration over a wide range of sites and weather years.

One submission recommends the government increase royalties and stumpage rates to cover the cost of enhanced enforcement of fish and wildlife regulations. Any increase in stumpage rates should be placed in a specific fund to finance solutions to forestry-related social-environmental problems and **not** into general revenue.

A number of individuals submitted short comments suggesting changes to forest practices:

- establish basic visual quality objectives for mountain slopes and mountain valleys since mountains are a prime recreational feature of the area
- stop the use of herbicides and chemical fertilizers because of negative environmental impacts in the long term
- stop all clearcut logging, increase buffers along waterways and allow no development around lakes
- carry out watershed assessments as soon as possible in all watersheds
- inventory wildlife and vegetation before logging starts
- use less slash burning as a method of site preparation; apart from other considerations, slash burning impacts the best mountain recreation season each fall
- close all logging roads to motorized vehicles once logging is completed
- give first choice in sensitive areas to anyone interested in horse logging or logging with small machines ; small band-saw mill operators have to have access to logs, as do log builders and small businessmen

Allowable annual cut adjustment

Two submissions express opposition to maintaining or increasing the allowable annual cut.

Two other submissions reject any increase in the allowable annual cut because long-term sustainability will not be achieved. One of these recommends the chief forester determine a cut that will conserve forest resources and maintain options for the future. The inevitability of harvest reductions should be addressed now by beginning

to scale down in an organized way. The other submission states a 15.5 per cent reduction in the allowable annual cut would continue to provide for a viable timber forest industry while maintaining tourism opportunities and the ecological integrity of our forests. The author supports the view of guide-outfitters that there is a need for a deceleration in the overall rate of harvesting and related road network creation.

Another respondent recommends a reduction of 15.5 per cent, but even at that level would still have concerns about the flexibility it would leave to address other problems.

Concern is expressed in one submission about the reliability of the estimates on which the chief forester will base the allowable annual cut adjustment.

One individual contends so much forest has been harvested that the only way for every town to survive in the future is to decrease the annual cut by at least 50 per cent. Another respondent also states a reduction of around 50 per cent is needed to protect non-timber values. The submission maintains recent satellite photos of the timber supply area clearly show a quarter of the forest was logged in the last 15 years and roughly half the forest is now logged or in plantations. It contends that to suggest the allowable annual cut can be maintained at this rate is absurd, and that it can be increased is an outrage.

Another submission supports a dramatically lower allowable annual cut. It asserts this would force the forest industry to produce more value-added products and give other industries the chance to develop. A lower allowable annual cut would also resolve many other problems regarding wildlife habitat, fish and water protection and climate changes.

A forest industry submission proposes the allowable annual cut impact of government initiatives such as the land and resource management planning process, the Forest Practices Code, Protected Areas Strategy and native land claims should be limited to six per cent. This would allow the current allowable annual cut to be maintained, as the yield analysis shows a non-declining harvest level six per cent above the current cut. The submission also asserts the deciduous allowable annual cut could be increased while maintaining other resource values.

Two forest industry submissions state the Timber Supply Review provides ample background data to maintain the current harvest level. They acknowledge there are several factors that are not included in the analysis which may have some negative impact on timber supply levels, but contend that there are enough conservative elements, plus the six per cent buffer, to more than compensate for potential reductions. One submission states this approach allows for stable harvest rates in the short term while the social and environmental issues evolve toward practical land-use decisions. The other recommends consideration be given to increasing the allowable annual cut to the maximum non-declining rate indicated in the *Timber Supply Analysis*. It states the abundance of mature timber in the timber supply area provides a considerable safety factor for setting the harvest at the indicated maximum non-declining rate.

Another forest industry submission asserts the analysis clearly supports an increase in the allowable annual cut to the base case scenario.

One respondent writes that accelerated harvesting and prompt reforestation will create employment, increase the forest's carbon sink and minimize blowdown and insect epidemics. For these reasons, the individual supports a 12 per cent increase to the allowable annual cut for five decades. It is suggested that with an increase in the allowable annual cut there should be more aboriginal 16.1 sales to provide potential socio-economic benefits to First Nations. Neither a 45 per cent increase (one of the alternative harvest flows modelled in the *Timber Supply Analysis*) nor a 15.5 per cent decrease are acceptable because of the impacts on communities.

An interest group submission supports an allowable annual cut increase of 12 per cent above the current level for the following reasons:

- the ability to mill new species
- continual improvements in tree-growing technology;
- improved productivity from managed stands

- the likelihood that the land and resource management plan table will sufficiently protect biodiversity, wildlife habitat and visual quality by protecting areas or special management zones
- the Forest Renewal program to improve forest regeneration.

It is suggested this harvest-level increase be tied to a commitment to maintain forestry-dependent communities.

Partition

A forest industry submission expresses concern at the suggestion in the *Discussion Paper* that higher harvest levels could be maintained in the Vanderhoof and Fort St. James timber supply areas. The respondent asserts this volume is largely in wood under 17.5 centimetres diameter at breast height and is needed to support mills already harvesting in this profile. The author proposes a partitioned cut based on a piece size of approximately 0.20 cubic metres to ensure harvesting occurs across the piece size profile and give the best return to the Crown.

One respondent recommends the Forest Service take a more proactive role in forest land management, specifically through the inclusion of good and medium cedar/hemlock and deciduous forest cover types in the allowable annual cut as a partitioned cut—similar to the situation in the Fort Nelson Timber Supply Area. Two other submissions also support a partitioned cut for cedar and hemlock types.

Related input

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

Two forest industry respondents stress the issue of splitting the Prince George Timber Supply Area should not be considered.

One respondent comments there are no better qualified or experienced persons to manage our Canadian forests than our own Forest Service personnel here in British Columbia. Preferably, they should be free from influence by or input from other countries.

One submission states land claims should be settled. Another recommends immediate implementation and enforcement of the Forest Practices Code to protect non-timber values.

Two submissions say the Timber Supply Review does not address the impending consequences of the Forest Practices Code, Protected Areas Strategy and First Nations negotiations.

Concern is expressed in one submission that the high volume of mature timber in the Prince George Timber Supply Area will mean the protected areas proposals will have a higher-than-proportional impact on the allowable annual cut.

One respondent states the allowable annual cut should be revised as soon as the land and resource management plan is complete. Additionally, because the Prince George Timber Supply Area has some of British Columbia's best back-country it should not be considered as a means of making up for timber shortfalls arising from over-protection elsewhere in the province.

A submission regarding Pulpwood Agreement 18 states that it remains a vital underpinning of the company's proposed pulp mill. The economic impact of the proposed pulp mill on the Vanderhoof area would be significant and would generate the following benefits:

- 175 new direct full-time jobs around Vanderhoof
- 590 additional jobs locally and across Canada
- a $350-million investment that would generate over 1,000 person-years of direct employment during the construction and in excess of $500 million in tax revenues to all levels of government over 20 years

The submission urges that discussions over the conditions of the offer—e.g. the proposed "firmwood standard"—be resolved in order to move ahead with the proposal.

Another submission states the Woodlot Expansion Program will remove upwards of 100,000 hectares from the timber supply area.

A forest industry submission recommends more work be done on gathering data for managed stands prior to the next yield analysis.

Appendix 1

Written submissions received by the Fort St. James, Prince George and Vanderhoof Forest Districts

Government agencies
Fraser Basin Management Program

Forest industry
L&M Lumber Ltd.
Prince George Timber Supply Area Licensees (two submissions)
Lakeland Mills Ltd.
Canadian Forest Products Ltd.
Northwood Pulp and Timber Limited
Gregg Creek Forest Enterprises Ltd.
Stuart Lake Lumber Co. Ltd (two submissions)
Vanderhoof Pulp and Paper Ltd.

Interest groups
East Francois Lake Community Association
Share B.C.
Prince George Timber Supply Area Partnership Committee

Individuals
Fifteen submissions (of which six were *Discussion Paper* response forms)

Comments on the data package were received from the forest industry, the government (Forest Service and Ministry of Environment, Lands and Parks) and an environmental interest group