

Boundary 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 Boundary 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 Boundary 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 Boundary 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 Boundary Forest District office in Grand Forks.

Public Review Process and Response

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

- copies of the *Timber Supply Analysis*, the *Socio-Economic Analysis* and the *Discussion Paper* were directly mailed to more than 180 organizations, businesses and interested members of the public. An accompanying letter offered presentations by district staff about the Timber Supply Review. The *Discussion Paper* also included a response form that readers were

encouraged to complete and return to the district manager

- eight information sessions were held with local governments and interest groups (see Table 1)
- two open houses were advertised via mail-outs, newspaper ads and radio ads
- radio interviews were provided
- newspaper articles were encouraged

As Table 1 shows, more than 200 individuals attended the information sessions and the open houses. The Boundary Forest District also received five completed response forms and 15 written submissions (see Appendix 1). On behalf of two timber companies with forest licences in the Boundary Timber Supply Area, Sterling Wood Group Inc. prepared a review of the *Timber Supply Analysis* (referred to as the "licensees' review" in this summary).

Organization (No. of participants)	Date
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Meetings with interest groups

Liberal Party Constituency Assoc. (10)	Dec. 1, 1994
Midway Village Council (11)	Dec. 5, 1994
Grand Forks City Council (7)	Dec. 6, 1994
Regional District of Kootenay Boundary, Area E Advisory Planning Committee (7)	Jan. 3, 1995
Boundary Woodlot Assoc. (40)	Jan. 7, 1995
Christina Lake Chamber of Commerce (15)	Jan. 10, 1995
Boundary Naturalists (40)	Jan. 23, 1995
Regional District of Kootenay Boundary, Directors (14)	Feb. 23, 1995

Open Houses

Grand Forks (40)	Jan. 25, 1995
Rock Creek (25)	Feb. 8, 1995

Table 1 Participation in public information sessions

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Public Input

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

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

Public input on other related government processes that may influence the timber supply in the Boundary Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Licensees' review

In general, the licensees' review agrees with the Forest Service timber supply analysis in its estimate of short-term timber supply. Nonetheless, the review contends that the analysis uses untested assumptions and therefore underestimates present and future timber supply volumes.

Specifically, the licensees' review maintains that the Forest Service analysis depends a great deal upon the estimates of existing mature timber volumes and the amount of timber that can be expected from regenerated stands. It is alleged that both these values are underestimated in the base case.

- **Estimates of mature stands**
A study by Sterling Wood of a sample of harvested areas compared the amount of timber actually harvested with the timber volumes predicted in the Forest Service timber supply analysis. The actual harvested volumes are 14 per cent higher than predicted. The licensees' review contends this indicates the current harvest level can be maintained for longer than projected in the base case.
- **Estimates for regenerated forests**
Estimating timber or site productivity (through the use of site indexes) is the key to determining timber growth for particular sites. Based on the results of studies from regenerated forests in other parts of British Columbia, Canada and the United States, the

licensees' review asserts the Forest Service timber supply analysis underestimates the future timber productivity in the Boundary Timber Supply Area. It has been widely demonstrated that productivity estimates for regenerated stands significantly exceed those for the original stands. For Interior forests, increases of at least 20 per cent in the long-term timber supply can be expected, compared to the base case.

The licensees' review also contends that the timber supply analysis overestimates the extent of inoperable areas: i.e. those areas that are infeasible or uneconomical to harvest. Based on a sample of six mapsheets the Forest Service estimate of inoperable areas is 14 percent higher than that made by a local forest company. In addition, the review concludes non-recoverable losses are overestimated: root rot losses, for instance, are deducted twice in the analysis.

With regard to updating development plans, the licensees' review states increasing flexibility is needed to allow continued access to merchantable stands, while meeting all reasonable integrated resource management objectives. It cautions against over-application or anticipation of the Forest Practices Code, which could take away some of the necessary flexibility.

Other public input

- **Productivity estimates**

A submission from the forest industry acknowledges that improvements in timber supply analysis methodology have occurred in this Timber Supply Review, but agrees with the licensees' review that a better definition of site index is needed. This submission questions the fact that regenerated stand yields used in the analysis are lower than existing stand yields for immature stands. No data is offered to support an alternative estimate.

In contrast, another respondent declares it is ecologically impossible for future productivity to be as great as the original forest growth. This individual asserts that structures such as mushrooms, birds and lichen that feed and protect the forest from pests are removed and destroyed by clearcutting. Another respondent questions the wisdom of basing

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decisions on extrapolation of values many decades into [the](#) future.

A few submissions maintain better [timber](#) inventory data is needed before decisions about long-term timber supply are made.

Socio-Economic Analysis

Employment and community impacts

A critique of the *Socio-Economic Analysis* was prepared [by the Interior Lumber Manufacturers' Association](#). It makes the following comments:

- the analysis underestimates the employment related to [timber harvested from the](#) Boundary Timber Supply Area by a total of 231 jobs province-wide
- a Grand Forks fibreboard plant's employment should be included since 35 per cent of its fibre comes from local mills. This amounts to 24 direct manufacturing jobs. The assumption [in the analysis](#) that this manufacturer has other fibre sources and would be unaffected by timber supply changes is untested
- Forest Service employment should be included (40 local and 13 regional staff positions). The critique asserts staff size is directly related to the level of harvesting and reforestation
- [these 77 direct jobs excluded in the analysis lead to a total of 231 jobs province-wide when a multiplier of 3 is applied to account for indirect employment. The Interior Lumber Manufacturers' Association critique maintains the use of this multiplier, rather than the 2.5 used in the Forest Service analysis, is justified and is supported in a study by the Ministry of Finance](#)
- lost forestry jobs cannot be "offset" by re-opening the slag plant in Grand Forks. The overall number of jobs in the area will still be lower than if no forestry jobs were lost
- lost income is understated because the loss of non-cash benefits (medical and dental plans, pension benefits, etc.) is not included
- the estimates of employment related to tourism expenditures appear unrealistically high. The Interior Lumber Manufacturers' Association critique questions the formula used in the analysis, by which one person-year of

employment is created for every \$22,727 of tourism expenditure

- the future loss of stumpage revenue to the province is underestimated because the analysis does not account for the new stumpage formula that nearly doubles the average stumpage rate
- federal impacts of changes in timber supply need to be expanded beyond lost federal income tax to include job losses and related economic impacts
- the statement in the analysis that employment impacts may be overstated could just as easily read that impacts may be understated. As conditions change in neighbouring timber supply areas, the number of jobs could decline in any one area as the competition for wood increases

In another submission a respondent declares [jobs will inevitably be lost because](#) the reduction in the size of the working forest means a significant reduction in provincial revenues, [and therefore](#) the funds for forest renewal won't be available.

Environmental impacts

The Interior Lumber Manufacturers' Association critique challenges the statement in the *Socio-Economic Analysis* that logging negatively affects bear forage, pointing out that many forage areas are in fact created by harvesting. As well, the critique declares [statements in the analysis report regarding the alleged negative impacts of logging on water quality should not be included because they are incorrect and could lead a reader to conclude that new provisions for riparian protection are inadequate](#).

Three respondents express concern about old-growth protection, suggesting single-tree selection in old-growth stands to minimize impacts until these ecosystems are better understood. In addition, they recommend leaving large trees in mixed age forests and leaving some entire older-growth areas. Old growth is seen as important for biodiversity maintenance and for cultural and tourism values. Another respondent reminds us of the role of trees in cleaning air and providing life-giving oxygen.

One submission maintains that concern for wildlife should be extended to cougar, black bear

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and other less prominent species. Also, habitat protection and some practices (such as trophy hunting) need to be addressed.

First Nations

The Interior Lumber Manufacturers' Association critique notes that it is inappropriate for the analysis to state expectations about the impacts of land claims settlements prior to negotiations being undertaken.

Discussion Paper

Critical factors

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

One forest industry submission suggests that in the section titled "Factors indicating the short-term timber supply may be lower than predicted in the base case," the assumed effects of the factors are based on speculation or unsubstantiated opinion. This submission contends the Timber Supply Review should work with the status quo and avoid speculation about the future.

Similarly, the licensees' review questions the value of those same assumptions:

- the areas designated as management zones for wildlife winter range and corridors are not official, and their inclusion in the timber supply analysis is speculative. Local industrial opinion is that deer winter range requirements were overstated in both green-up and maximum area requirements
- grizzly bear habitat can be managed by access management rather than habitat preservation. This would not affect timber supply
- since no biodiversity guidelines have been confirmed, the discussion on old-growth forests is speculative. Furthermore, preservation of old growth is part of the Protected Areas Strategy, not the Timber Supply Review
- the discussion on forest ecosystem networks is pure speculation
- under current practice, management of riparian areas results in minor land base withdrawals
- the *Discussion Paper* suggests that green-up requirements may increase to nine metres. The critique suggests that five metres is adequate

based on calculations done using the *Draft Watershed Assessment Procedures*

Allowable annual cut adjustment

Many suggestions concern whether and how the allowable annual cut should be adjusted. This input ranges from support for maintaining the current harvest level to requesting an immediate reduction, to requesting no decision be made at this time. The following comments are made.

To allow time for community and industry adjustment, improved inventory, and assessment of ramifications of other initiatives such as the Forest Practices Code and the West Kootenay-Boundary Land-Use Plan, four submissions (two from the forest industry and one each from the Village of Midway and the City of Grand Forks) suggest the current allowable annual cut of 700,000 cubic metres should be maintained for at least the next 5 to 10 years.

The authors of the licensees' review support maintaining the allowable annual cut at the current level for 250 years, based on the greater existing mature timber volume estimated by the forest industry and on their estimates of timber productivity that suggest increases of at least 20 per cent in the long-term timber supply can be expected. They contend that the Forest Service timber supply analysis provides no reasons to reduce the allowable annual cut below 700,000 cubic metres in the short term.

Three submissions contend that the timber supply projections are over-optimistic since natural systems are being destroyed and the inputs needed for forest growth are not being supplied. These submissions indicate a preference for an immediate or early reduction in the allowable annual cut to the long-term sustainable harvest level. Based on observations of logging truck activity from the area, one submission doubts if annual growth is able to keep up with the wood being removed. This individual suggests the reduction is also needed to address new wildlife management practices.

Three submissions urge a cautious and conservative approach to determining harvest levels but do not express a preference for a specific annual allowable cut. They support their position as follows:

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- it is foolish to assume all estimates and assumptions are complete and correct
- the functioning of natural systems is not fully understood
- it will be easier to adjust upward if future events permit
- supply pressure will encourage better and/or alternative wood uses and promote value-added manufacturing
- there are too many unknowns that could decrease supply—e.g. initiatives under the Commission On Resources and Environment and the Forest Practices Code—or that could increase supply—e.g. volume additions for mature trees within immature stands, commercial thinning, increased growth from intensive silviculture, and methods to harvest currently uneconomical stands

Six submissions request that no allowable annual cut determination be made until an audit of the beetle kill uplift is carried out and a mitigation or forest industry rationalization plan (as proposed in the West Kootenay-Boundary Land-Use Plan) is in place. The submissions maintain these actions are needed to restore trust in the Forest Service and the forest industry, and confidence in the future.

Timber Supply Review process

One industry submission makes the following comments:

- the proposed allowable annual cut determination and the rationale statement should be released for public comment prior to final determination. This would allow misunderstandings and errors to be cleared up before the final determination
- the Forest Service must begin immediately to improve inventories and analytical tools to define resource management opportunities; the latter must be subject to public review prior to any further allowable annual cut determination

Related issues and processes

Allocation of annual allowable cut

Several submissions assert there is a need for changes in how the timber supply is allocated and used:

- more wood needs to be made available under small business programs, woodlots, harvest contracts, log auctions, etc., to provide a stable employment and economic base
- a micro-business plan is needed to get twice the jobs for the same amount of wood
- more wood needs to be available to small value-added operations such as manufacturers of furniture and musical instruments.
- timber supply must be tied to the adjacent community to ensure the benefits of the harvest will stay in the area
- instead of establishing special management areas—wildlife corridors, riparian buffers, etc.—more woodlots should be licensed so mills will still get logs and the public will get a quality managed forest

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Appendix 1

Submissions received by the Boundary Forest District

Local government

The City of Grand Forks
The Village of Midway

Forest industry

Weyerhaeuser Canada
Interior Logging Association
Interior Lumber Manufacturers' Association (two submissions)
Boundary Timber Supply Area Licensees (review prepared by
Sterling Wood Group Inc.)

Interest groups

The Granby Wilderness Society
Grand Forks Watershed Coalition

Individuals

12 submissions and response forms