

Bulkley Timber Supply Area Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Bulkley Forest District
Bag 6000
3333 Tatlow Rd.
Smithers, B.C.
VOJ 2N0

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

Bulkley Timber Supply Area

Background

As part of the review of timber supply in the Bulkley Timber Supply Area, the British Columbia Forest Service distributed a *Public Discussion Paper* and two technical reports, the *Timber Supply Analysis Report* 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 that was 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 Bulkley Timber Supply Area.

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 Privacy Act*) can be reviewed at the Bulkley Forest District office.

Public Review Process and Response

Bulkley Forest District Staff actively solicited public input on the Timber Supply Review in the Bulkley Timber Supply Area through the following actions:

- direct mail-out of *Public Discussion Papers* to more than 100 people and groups within or adjacent to the Bulkley Timber Supply Area. The discussion paper included a response form which readers were encouraged to complete and return to the district manager
- presentations on the Timber Supply Review were offered to local government and interest groups in the area
- three information sessions were held with the timber industry, labour, local governments, business and interested members of the public (see Table 1). The public information session was co-sponsored with Northwest Community College and the Skeena Round Table

- one open house was held
- radio interviews were provided
- newspaper articles were encouraged

As Table 1 shows, over 110 individuals attended the information sessions and the open house. The Bulkley Forest District also received 18 written submissions including two from organizations (see Appendix 1). Pacific Inland Resources and Repap Smithers Inc. commissioned two consulting companies to technically critique the *Bulkley Timber Supply Analysis Report* (referred to as the 'technical critique' in this report).

Organizations (No. of participants) Date

Meetings with interest groups

Licensees and union representatives (12)	September 21, 1994
Town councils, chamber of commerce, public (11)	September 21, 1994

Open house

Smithers (25)	September 22, 1994
---------------	--------------------

Public information session

Smithers (65)	November 3, 1994
---------------	------------------

Table 1: Participation in public sessions

Public Input

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

- timber supply analysis
- socio-economic analysis
- public discussion paper

Timber Supply Analysis

Size of the timber harvesting land base

Several respondents recommended that other planning processes and initiatives which affect the size of the land base (Protected Areas Strategy, Land and Resource Management Plan, Ecosystem Networks) be considered in the allowable annual cut determination. It was suggested that ignoring other initiatives results

Bulkley Timber Supply Area

in an optimistic prediction of the land base available for timber harvesting. These respondents considered this irresponsible and suggested it revealed a timber bias in the Timber Supply Review process.

The technical critique questioned the validity of excluding agricultural Crown land from the land base. Instead, it suggested the value of agricultural land should be compared to the forest, range and dispersed recreational values it might generate as part of the Provincial Forest.

The technical critique identified similar concerns regarding the exclusion of land from the timber harvesting land base for wildlife and wilderness management and for integrated resource management. The critique stated the Ministry of Forests does not attempt to quantify the costs and benefits of these decisions.

- **Special management practices**

One respondent suggested the present visual quality objectives do not consider the view from mountain tops, an important perspective in outdoor adventure travel.

Another suggested a shift from clearcutting to selection harvesting systems would maintain important habitats and viewsapes and could increase timber yields.

- **Timber growth and yield estimates**

Surprise was expressed at the uncertainty surrounding the productivity estimates used in the Timber Supply Analysis. Respondents supported the development of more complete productivity information. Some suggested estimates should be conservative to allow for possible errors. It was noted that an increase in future growing capacity does little to improve the projected timber supply in the short term.

Some submissions identified two areas of uncertainty in the long-term timber supply: the productivity of the forest over several rotations and the quality of wood which will come from second-growth stands.

- **Species harvested and utilization**

Comments concerning the economic potential of deciduous species were received and specific

mention was made of the world market for birch lumber.

It was suggested that the utilization of timber could be improved by increasing milling efficiency and by putting all timber sales up for bid. As well, trees should either be utilized or they should not be cut.

- **Timber supply modeling assumptions**

The technical critique rejected two assumptions used in the timber supply analysis: that timber supply levels can never fall below the long-term level and that the rate of decline must be between eight and 12 per cent. The critique suggested that if these assumptions were changed, the current allowable annual cut could be maintained for at least one more decade than is predicted in the base case.

Socio-Economic Analysis

- **Employment impacts**

Economic forecasting in this report was criticized because trees harvested were simplistically equated to jobs and a strong economy. A linear relationship between cubic metres harvested and employment was rejected in some submissions.

The analysis was also criticized because a lack of information on historical employment trends prevented:

- incorporation of the effects of technological change on employment
- tracking or projection of the overall economic base of the Bulkley Timber Supply Area
- adequate consideration of the economic contribution of non-forestry workers, and the extent to which their livelihood depends on a high quality environment

More information is needed, however, before employment projections can be made. Past employment trends in this area need to be given more attention to see if they can be tied to changes in the forest sector. That in turn will make more accurate forecasting possible.

One respondent pointed out the socio-economic analysis does not address probable

Bulkley Timber Supply Area

job losses in the tourist industry if present harvest levels are maintained.

- **Community impacts**

The technical critique maintains that the rules or assumptions inherent in the timber supply analysis mean British Columbians forgo the opportunity to maintain stable social and economic benefits from the forest in the short term in order to stabilize social and economic conditions in the distant future. A relative and certain cost is borne in the present, in return for a distant and uncertain benefit. The critique suggests shifting some costs to the future would create more time for orderly amortization of capital assets and for planning individual and community adjustments.

- **Non-timber values**

A few individuals noted that the non-timber values in local forests could exceed timber values in the future. In a global context, the Bulkley Timber Supply Area is relatively undisturbed and will have increasing tourism value, particularly for adventure tourism. Timber harvesting conflicts with this industry as it compromises the aesthetics of untouched wilderness.

The Ministry of Environment, Lands and Parks noted that the analysis accounts for volume of timber only, and that timber management focused on product quality and diversification would result in beneficial habitat spin-offs.

- **Environmental concerns**

Many comments indicated concern for the maintenance of biodiversity given current timber supply projections. Of specific concern to the Ministry of Environment, Lands and Parks were:

- the effect on wildlife of road development and subsequent access
- the removal of old-growth forests in caribou ranges where the rate of forest maturation and lichen development is considered insufficient for caribou range
- the pressure on specific caribou populations as harvesting shifts to higher elevation forests

The Ministry of Environment, Lands and Parks and other submissions pointed out that approximately 10 per cent of the timber harvesting land base has been deferred from harvesting pending future land use decisions, resulting in the concentration of harvesting in undeferred areas. This was seen as a threat to maintaining biodiversity within the areas where harvesting is occurring.

Some noted the impact of deferred harvesting on timber supply is compounded because mature timber adjacent to previously harvested areas is unavailable for harvest until current green-up standards are achieved.

Some submissions suggested current practices, as assumed in the analysis, do not allow sufficient flexibility to improve harvesting and silviculture practices to meet forest and landscape level biodiversity objectives. It was pointed out that actual practices have become more stringent since the data for the analysis were compiled and the trend -- reflected in the Forest Practices Code and Land and Resource Management Planning guidelines -- is towards increasingly stringent requirements.

Another submission indicated the analysis limited its consideration for wildlife to big game species rather than to biodiversity as a whole.

- **Local sawmill capacity**

Several respondents commented that local mills have been built to process unrealistic volumes of timber and that downsizing is inevitable; there were varying opinions on how this should take place. It was noted that sawmills have likely recovered their capital costs by now and are not owed anything by the community.

A respondent also questioned the ability of the mills to profitably process large volumes of marginal wood during economic downturns.

Public Discussion Paper

- **Allowable cut determination**

Several respondents rejected the base case timber supply forecast presented in the timber supply analysis. They suggested maintaining

Bulkley Timber Supply Area

the current allowable annual cut for the next 20 years should not be considered because the long-term sustainable timber supply is half the current allowable annual cut.

Most respondents urged an immediate reduction in the allowable annual cut. Many suggested postponing this action would:

- reduce future flexibility for integrated resource management decisions
- hasten the development of uniformly aged stands; this was generally viewed as undesirable

Many respondents considered job loss impacts would be more manageable if the allowable annual cut reduction began now and continued gradually. Maintaining the status quo for the next 20 years was perceived to simply defer and perhaps exacerbate the impacts. In the words of one respondent, “sticking to the present forecast of 895,000 cubic metres a year is like racing down a slippery road, refusing to lower our speed until we receive official word about the location of the ice.”

One submission suggested a reduction in the allowable annual cut be tied to local employment initiatives in the forest sector and elsewhere.

Historically, the allowable annual cut has been allocated between long-term licences (650,000 cubic metres) and temporary licences (245,000 cubic metres). One respondent suggested these temporary licences were not intended to be sustained and a decrease in allowable annual cut was inevitable.

A few respondents commented that major industrial restructuring is imminent due to current sawmilling over capacity in the region regardless of the allowable annual cut determination for the Bulkley Timber Supply Area. One respondent observed that the Bulkley Timber Supply Area is relatively economically diverse now and is in a reasonably good economic situation, so a timber supply reduction and restructuring are appropriate now.

The Northern Interior Woodworkers Association suggested harvests be maintained at current levels as long as possible in the

interests of community economic stability. Maintaining current harvest levels should be linked to a commitment from license holders to:

- implement a comprehensive incremental silviculture program
- produce more value-added products from the forest resource

It was also noted that the base case timber supply forecast allows the harvest of older, dying forests sooner, thereby generating a greater financial value. Additionally, as more intensive forestry is practiced in the Bulkley Timber Supply Area, the long-term timber supply may increase.

Some respondents favoured separate allowable annual cuts for sawlog quality timber, marginal timber and pulp to gain greater control of the harvesting of these classes. Further, these allowable annual cuts should be proportionate to the availability of these timber classes in the forest. A separate allowable annual cut for deciduous wood was also suggested.

Another submission suggested separate allowable annual cuts to encourage logging of inoperable timber that is currently considered uneconomic or infeasible to harvest provided adequate environmental safeguards are in place.

The suggestion was made that an allowable annual cut be determined for each watershed individually. If a watershed was deferred, its associated allowable annual cut would be deferred as well.

Some individuals and the Ministry of Environment, Lands and Parks stated maintaining the current allowable annual cut while shifting to a greater pulp log harvest would lead to increased pressure on some high elevation ecosystems. These respondents suggested this was unwise given the lack of information about high elevation regeneration.

Appendix 1

Submissions Received by the Bulkley Forest District

Government agencies

Ministry of Environment, Lands and Parks, Smithers

Industry

Pacific Inland Resources Limited (A Division of West Fraser Mills Ltd.), Smithers

Repap Smithers Inc., Smithers

Interest groups

Northern Interior Woodworkers Association (Affiliated to the Communications, Energy and Paperworkers Union of Canada), Smithers

Individuals (21)