

Cranbrook Timber Supply Area Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Cranbrook Forest District
1902 Theatre Rd.
Cranbrook, B.C.
V1C 4H4

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

Cranbrook Timber Supply Area

Background

As part of the review of timber supply in the Cranbrook 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 Cranbrook 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 Cranbrook Forest District office.

Public Review Process and Response

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

- copies of the *Timber Supply Analysis*, the *Socio-Economic Analysis* and the *Discussion Paper* were provided to about 55 individuals, businesses, schools, libraries and First Nations. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- several information sessions were held with representatives from the forest industry,

three levels of government, interest groups and the media (see Table 1)

- three open houses were advertised extensively
- radio interviews were provided
- newspaper articles were encouraged

As Table 1 shows, more than 100 individuals attended the information sessions and the open houses. In addition, the Forest District received one completed response form and 11 written submissions (see Appendix 1). The Cranbrook Timber Supply Area licensees also commissioned Timberline Forest Inventory Consultants to undertake a separate timber supply analysis. This report is referred to as the "licensees' analysis" in this summary.

Organizations (No. of participants) Date

Information sessions

Elected officials

Members of Legislative Assembly (2)	March 6, 1995
Member of Parliament	March 17, 1995
Cranbrook City Council (7)	April 3, 1995
Regional District of East Kootenay (20)	April 7, 1995

Interest groups

Forest industry representatives (6)	March 15, 1995
East Kootenay Environmental Society (4)	March 15, 1995
Elk Valley Integrated Task Force (19)	April 5, 1995

Other

Media representatives (3)	March 9, 1995
---------------------------	---------------

Open Houses

Kimberley (11)	April 4, 1995
Sparwood (10)	April 5, 1995
Cranbrook (20)	April 6, 1995

Table 1: Participation in public information sessions

Cranbrook Timber Supply Area

Public Input

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

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

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

Timber Supply Analysis

Licensees' analysis

The licensees' analysis, commissioned by the Cranbrook Timber Supply Area licensees, examines in detail the data and assumptions used in the Forest Service timber supply analysis. The licensees' analysis identifies a number of areas where it believes the Forest Service analysis was too conservative in its approach, and then reanalyzes the information to produce a range of different scenarios and forecasts for timber supply levels.

The licensees' analysis proposes the following differences in assumptions or approaches:

Definition of the size of the land base that is economically and environmentally feasible to harvest

- the licensees' analysis maintains that approximately 20,000 hectares of problem-forest types were erroneously removed from the land base
- according to the licensees' analysis, areas with problem-forest types will become part of the land base following harvesting and should be factored into it
- the licensees' analysis contends reductions for environmentally sensitive areas were higher than in other timber supply areas in the Nelson Forest Region and that high elevation areas supporting harvestable forests were excluded from the land base

- the impact of 50,000 hectares of adjacent parkland excluded from the land base is questioned by the licensees' analysis
- further analyses that increase the size of the land base available for harvesting indicate no biological need to reduce the timber supply for five decades

Analysis units

- the licensees' analysis maintains dissimilar sites were inappropriately grouped together in the Forest Service analysis. Subsequent averaging of harvest age and green-up age affects the timing of harvest

Timber productivity estimates

- according to the licensees' analysis, an excessively high volume reduction was used to account for seed trees left on harvested areas
- the licensees' analysis questions why the relatively low productivity assumed for existing older forests was not adjusted upward for managed stands
- the licensees' analysis maintains minimum harvestable ages are high and do not allow for changes in productivity expected from managed forests

Forest management zones

- the licensees' analysis suggests the riparian management zone should have been identified on maps prior to the analysis, rather than defined as a percentage of each area

Integrated resource management

- the licensees' analysis states inoperable stands were not considered in meeting forest cover requirements except in meeting visual quality objectives
- according to the licensees' analysis, the age required to meet green-up requirements was not reduced to account for the more rapid growth of managed forests
- by applying a combination of changes to management assumptions and to the size of the land base, a timber supply level higher than the current allowable annual cut can

Cranbrook Timber Supply Area

be maintained indefinitely, according to the licensees' analysis. The authors maintain that they used "sound and conservative inputs and assumptions" in reaching this conclusion

Unsalvaged losses

- the licensees' analysis estimate was only half the Forest Service estimate
- sensitivity analyses carried out by the consultant indicate that with changes in assumptions about seed-tree volumes, minimum harvestable ages, green-up ages and unsalvaged losses, no decrease in the timber supply occurs for two decades

Other public input

- **Productivity estimates**
The East Kootenay Environmental Society states assumptions about harvest potential are not sufficiently conservative to ensure protection of critical environmental values. No recommendations for more appropriate levels are provided.
- **Maintaining biodiversity**
The East Kootenay Environmental Society contends more area is required to protect biodiversity values than was assumed in the Forest Service timber supply analysis.

The society asserts current planning continues to emphasize the harvest of older forests and suggests this may lead to their liquidation. It maintains the emphasis should be on harvesting the existing predominant lodgepole pine areas in this timber supply area.

The society also contends that while short-term harvesting opportunities exist in areas where trees have invaded natural grasslands, these should not be seen as part of the timber harvesting land base. In fact, more area must be withdrawn from timber production in favour of protecting traditional grassland habitats.

The Interior Lumber Manufacturers' Association submission declares both harvesting and fires can be used to increase grasslands. If that increase is desired, it

suggests harvesting would be the method of choice.

The Elk Valley branch of the East Kootenay Environmental Society maintains the combined effects of logging and mining in that valley require that travel corridors, connectivity and cumulative impacts be addressed. This submission also questions the assumption that 50-per-cent lodgepole pine is the natural condition of forests in the area, because of the long history of human intervention. Restocking harvested areas with lodgepole pine does not enhance biodiversity, according to the society.

One individual submission and the East Kootenay Environmental Society caution that efforts must be made to extract the timber resource without radically affecting biological processes. As an example, the effects on soil and wildlife of the total removal of biomass from harvested areas must be monitored.

The Interior Lumber Manufacturers' Association contends it is incorrect to state that forestry practices result in a decline in biodiversity values and radically alter ecosystems. On the contrary, changes resulting from forestry are of a temporary nature. The natural history of the area shows alterations every 80 to 150 years due to wildfires and human intervention.

Socio-Economic Analysis

Employment and community impacts

The submission from the Interior Lumber Manufacturers' Association maintains the *Socio-Economic Analysis* fails to recognize the contribution and importance of the forest sector. The following specific points are made:

- the after-tax income attributed to the forest sector is low; it does not include activities such as construction and transportation that are strongly connected to the forest sector
- the contributions to pension, health and insurance plans made by forest sector employees are not included
- the future revenue loss to the provincial government is underestimated because it is

Cranbrook Timber Supply Area

based on stumpage rates one-third of current rates

- the future revenue loss to the federal government is not featured as prominently as it should be
- Forest Service employees should be included in estimates of forest sector employment
- employment in incremental silviculture was not included
- it is incorrect to imply that forestry jobs can simply be replaced by other jobs
- the impact of reductions in timber supply in surrounding timber supply areas was not considered

The East Kootenay Environmental Society asserts the relative diversity of the timber supply area economy indicates the dire predictions of social and economic chaos resulting from reductions in timber supply are exaggerated. The goal must not be to maintain employment levels at the expense of forest health. Elevated cut levels will not sustain either employment or the environment. Instead, employment has to be increased by adding value to the timber resource.

Environmental impacts

The Interior Lumber Manufacturers' Association critique of the *Socio-Economic Analysis* makes the following comments:

- recent research regarding grizzly bear populations concludes the key factor is management of access and rural settlement, not conflicts with logging
- no evidence exists for the widespread degradation of water referred to in the *Socio-Economic Analysis*, except for specific examples such as Lake Koocanusa
- predation, rather than limited habitat due to forest land management, is likely responsible for low caribou population numbers
- statements about the negative impacts of forestry activity on fish populations are unfounded generalizations. Fish catch limits may be a more critical factor

Non-timber values

The Interior Lumber Manufacturers' Association asserts the presence of contradictory statements in the analysis regarding the importance of visual quality to tourism. It suggests this implies the forestry/tourism relationship was not carefully evaluated.

First Nations

The Interior Lumber Manufacturers' Association submission maintains the *Socio-Economic Analysis* is incorrect in describing First Nations as under-represented in the forest sector work force. The analysis mixed numbers for total forestry and direct forestry employment, and, in fact, First Nations are present in the forestry work force in proportion to their population, according to the submission.

Discussion Paper

Intensive silviculture

The *Discussion Paper* identifies intensive silviculture as one opportunity for offsetting the effects of projected timber supply reductions. The East Kootenay Environmental Society maintains it is not yet proven that silvicultural inputs produce commercially viable and biologically sustainable forests, and cautions against predicting future timber supply on that basis.

The society also expresses concern about the quality of wood that will be produced from intensive management, which it predicts will be inferior to that from existing natural forests. Since the Forest Service analysis focuses on maximum yield in minimum time, the society is concerned that a transition from a sawlog economy to a pulpwood economy is possible. It describes this as a travesty in view of the potential of the area to grow high-value, high-quality wood.

An individual submission suggests intensive forestry should be restricted to the dedicated areas identified in the East Kootenay Land-Use Plan.

Allowable annual cut adjustment

Input on the determination of the allowable annual cut recommends either a maintenance of the current level or an immediate reduction.

Two forest industry submissions point to the conclusions reached by the licensees' analysis and maintain there is no biological reason to reduce the allowable annual cut. With this same information, the East Kootenay Regional District and the IWA

Cranbrook Timber Supply Area

agree the cut should be maintained at the current level unless the Forest Service can prove the critique to be in error.

The East Kootenay Environmental Society (three submissions) and one individual submission support an immediate reduction in the allowable annual cut because of the need to protect conservation values, to be conservative with remaining, high-quality natural forests, and to have some leeway in case of a catastrophic event.

One East Kootenay Environmental Society submission describes a 10 per cent reduction as a step toward sustainable forestry although it will still compromise biodiversity.

Related processes

The *Discussion Paper* states that the results of decisions from the East Kootenay Land-Use Plan and from implementation of the Forest Practices Code are not included in this Timber Supply Review. However, two submissions from the East Kootenay Environmental Society declare these initiatives must be considered. Otherwise, conclusions will be based on outdated information and management practices.

Two submissions note that the effects of timber supply reductions could be modified through changes in the tenure system, making more wood available to small manufacturers and woodlots.

Several comments were made on the process of the Timber Supply Review:

- more information should be available to the public about the impacts of various constraints
- the proposed allowable annual cut determination and rationale should be released for comment prior to the final determination
- environmental concerns and impacts were mentioned rather than addressed, and the analysis was based more on volumes of wood to be harvested than on biological integrity
- the review shows a bias for biological conservatism over social conservatism. The latter means that given the uncertainties in the analysis, timber supply levels should be maintained and human hardship avoided
- an immediate start to improving inventories and process tools for the next Timber Supply Review is needed

Appendix 1

Submissions received by the Cranbrook Forest District

Local government

Regional District of East Kootenay

Forest industry

Interior Lumber Manufacturers' Association (two submissions)

Cranbrook Timber Supply Area Licensees (timber supply analysis prepared by
Timberline Forest Inventory Consultants)

IWA-Canada, Local 1-405, Cranbrook

Interest groups

East Kootenay Environmental Society, Elk Valley Branch

East Kootenay Environmental Society, Forest Watch Committee

East Kootenay Environmental Society, Kimberley

Individuals

Four submissions