# Kamloops 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 Kamloops 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.

# Kamloops Timber Supply Area

## Background

As part of the review of timber supply in the Kamloops 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 Kamloops 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 public input in sufficient detail to indicate the range of input received. The submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at both the Kamloops and Clearwater Forest District offices.

## Public Review Process and Response

Kamloops and Clearwater Forest District staff actively solicited public input on the Timber Supply Review in the Kamloops Timber Supply Area through the following actions:

- copies of the *Discussion Paper* were mailed to over 700 organizations and individuals within the Kamloops 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(s)
- a standing offer was made to provide presentations on the timber supply review to interest groups
- a meeting with the major licensees in the Kamloops Timber Supply Area was held to discuss their analysis of the timber supply analysis
- two open houses were advertised through a direct mail-out, newspaper advertisements and radio coverage
- local newspaper articles reported on the open houses and interviews with Forest Service staff

As Table 1 shows, 97 individuals attended meetings and open houses. The Kamloops and Clearwater Forest District offices received 10 completed response forms and 12 written submissions (see Appendix 1). The major licensees operating in the Kamloops Timber Supply Area commissioned Timberline Forest Inventory Consultants to technically critique the *Timber Supply Analysis.* That document is referred to as the "licensee analysis" in this report.

| Organizations (No. of participants) | Date |
|---|---|
| **Information Sessions** | |
| Kamloops Land and Resource Management Planning Team (20) | May 18, 1995 |
| Major licensees (7) | Aug. 15, 1995 |
| **Open Houses** | |
| Kamloops (45) | July 18, 1995 |
| Clearwater (25) | July 20, 1995 |

*Table 1: Participation in public information activities*

Overall, those who attended the open houses indicated they were informative and useful, but that much of the information was too technical for the general public to assess. One respondent expressed a preference for having a panel presentation with a question-and-answer period for the public, as opposed to the open house forum.

Many individuals and organizations indicated they did not attend the open houses because they had already provided input through the Kamloops Land and Resource Management Planning process.

## Public Input

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

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

Additional comments not directly related to components of the three documents, and public input received through the Kamloops Land and Resource Management Plan process are summarized at the end of this section.

### Timber Supply Analysis

***Licensee analysis***

The Forest Service timber supply analysis projects that the current harvest level can be maintained for 20 years. According to the analysis submitted by the major licensees, this is conservative, based on the assumptions listed below.

- **Growth and yield estimates**
  Future stand volumes have been underestimated in this review because the site index equations underestimate the site indexes of overmature stands and overestimate the time required to achieve "green-up."

  Another reason cited for underestimated future stand volumes is the higher operational adjustment factor of 15 per cent. A new standard, developed after the Forest Service analysis was conducted, produces a lower operational adjustment factor and increases future volumes.

- **Minimum harvestable age**
  The licensee analysis recommends that future timber supply analyses consider minimum volume per hectare, minimum stem diameter and culmination age in determining minimum harvestable ages.

- **Timber harvesting land base**
  Some operations occur within inoperable areas that should be included in the timber harvesting land base for future analyses.

- **Roads, landings and skid trails**
  The 12.8 per cent land base deduction for existing roads, landings and trails is excessive; the actual figure is closer to 9.1 per cent. The analysis also contends the estimate of 7.6 per cent for future roads, landings and trails is too high; 5.2 per cent would be more appropriate.

- **Regeneration assumptions**
  The quantities of balsam, cedar and hemlock regeneration incorporated into the Forest Service analysis exceed current practice.

  The licensee analysis also states the regeneration delay periods are too long for some species. It reduces the regeneration delay for these species so that the same regeneration delay is used for all species except naturally regenerated lodgepole pine.

- **Selection harvesting**
  The volume estimate for selection management is low.

- **Unsalvaged losses**
  Unsalvaged losses have been overestimated in the Forest Service analysis. The volume reduction for wildlife trees is unnecessary, as current practice is to utilize deciduous trees for wildlife trees and top snags for wildlife stubs, neither of which have an impact on the merchantable inventory. In addition, the losses to Hemlock Looper have been double-counted through the volume removal under unsalvaged losses, and the removal of the hemlock volumes of Class 8 and 9 stands from the timber harvesting land base.

The licensee analysis also maintains there will be fewer unsalvaged losses as access improves, but that the Forest Service analysis does not take this into account.

- **Ungulate winter range**
  The actual harvesting constraint in this zone is overestimated because selection harvesting areas, which already meet green-up requirements, are interspersed within this zone.

- **Community watersheds**
  The weighted green-up height for community watersheds should be 4.8 metres instead of the 5.4 metres specified in the Forest Service analysis. This is based on a six-metre hydrologic green-up height in the upper 60 per cent of the watershed as opposed to the seven-metre green-up height used in the Forest Service analysis.

- **Harvest passes**
  The licensee analysis asserts the method of applying the number of harvest passes in the Forest Service analysis is incorrect as it assumes that each pass harvests the same area. The actual limitation is that not more than 30 per cent of the area should below three metres in height.

The licensee analysis also makes the following comments regarding the Forest Service analysis:

- the amount of lodgepole pine harvested in its early stages is underestimated due to the "oldest first" approach to harvesting

- local adjustments should not have been made to the harvest profile in developing the analysis unit distribution of not-satisfactorily-restocked area

Since the data was collected for the Forest Service analysis, the Kamloops Land and Resource Management Plan has been approved and specific problem forest stands have been designated to Pulpwood Agreement 16. These initiatives are now current management and are incorporated into the licensee analysis. Based on this information, the licensees conclude that the current harvest level can be maintained for 80 years.

***Other Public Input***

- **Caribou management/ Old Growth**
  The Kamloops Land and Resource Management Plan modelled the Caribou Early Winter and Caribou Late Winter zones on a 150-year rotation. One BC Environment staff member states that at 150 years arboreal lichen is just starting to grow. The respondent regards 150 years as a "minimum" rather than "optimum" requirement for caribou management.

Another submission expresses opposition to removal of the requirement for 200-year-old trees in Caribou Management zones as modelled under the sensitivity analysis for the Kamloops Land and Resource Management Plan.

- **Lakeshore management**
  BC Environment staff note that the 200-metre reserve zone around lakes as used in the Forest Service analysis is an average rather than a fixed distance.

- **Riparian management**
  BC Environment staff question the process used to determine the impacts of riparian reserve zones on the timber harvesting land base. Specifically, they question the validity of using a gross-to-net ratio to determine the impact on the net operable land base.

- **Minimum harvestable age**
  One submission expresses concern about minimum harvestable ages. It claims the proposed minimum harvestable ages of 81 to 101 years underestimate the longer growing periods required for species like spruce and balsam at higher elevations

- **Not-satisfactorily-restocked areas**
  The Shuswap Nation Tribal Council questions why there is such a high level of untreated not satisfactorily restocked land (3841 hectares).

## Socio-Economic Analysis

- **Employment and community impacts**

Four of the submissions received made reference to employment in the Kamloops Timber Supply Area. All four recognize the dependence of timber supply area economies on the forest industry. One submission contends that if jobs are chosen over trees, both will be lost in the long run. Another submission insists that the number of forestry jobs that may be lost must be identified prior to an adjustment in the allowable annual cut.

A critique by the Interior Lumber Manufacturers' Association makes a number of points regarding the *Socio-Economic Analysis*' discussion of employment impacts as a result of harvest level reductions. The submission asserts that timber supply area employment impacts are "understated" because:

- Ministry of Forests employment was not included in the harvest-dependent employment figure, and
- the multiplier (2.5) used to determine indirect and induced jobs needs further evaluation

The Interior Lumber Manufacturers Association also disputes the statement in the *Socio-Economic Analysis* that job losses may be offset by employment through value-added manufacturing.

The major licensees maintain that employment in the value-added manufacturing sector should not be portrayed as a means of replacing current forest sector employment, but as a means of job creation.

- **Environmental impacts**
  The Interior Lumber Manufacturers' Association approved of the way the environmental impacts discussion in the Socio-Economic Analysis was specific to the timber supply area rather than provincial in scope. The association regards this information as more useful than some of the information provided in other socio-economic analyses.
- **Government revenue**
  The *Socio-Economic Analysis* includes an assessment of federal government revenue generated by the forest industry within the Kamloops Timber Supply Area. It also incorporates changes in provincial government revenue since new stumpage fees were imposed. The Interior Lumber Manufacturers' Association asserts that these are improvements over previous timber supply reviews.

## Discussion Paper

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

- **Landscape management**
  Three respondents comment on the practice of visual landscape management. The major licensees claim that the newly defined criteria for landscape management set out in the Land and Resource Management Plan are more reasonable than the previous guidelines that were incorporated into the base case of the Forest Service analysis.

  One respondent stresses the importance of managing visually sensitive areas with care in order to maintain tourism values. In contrast, another respondent declares that the concept of landscape management seems "inherently dishonest."

- **Biodiversity**
  Four respondents mention the importance of protecting biodiversity. Two respondents state the conservation of biodiversity should be an overriding objective of forest management. One author maintains that healthy forests contain historic levels of all species. Another submission suggests that alternative silviculture techniques such as single-tree selection, shelterwood and seed tree should be used more often in the Kamloops Timber Supply Area in order to maintain biodiversity. Further, at least 10 per cent of the forest should be over 200 years old at all times.

- **Problem forest types**
  A significant portion of the Kamloops Timber Supply Area is classified as problem forest types and is not currently part of the timber harvesting land base. In recent times, practices

and technology have changed to the extent that it may be possible to include these problem forest types in the timber harvesting land base. Some of the problem forest types have also recently been identified for allocation to Pulpwood Agreement 16.

Several respondents comment on problem forest types in the Kamloops Timber Supply Area. Two respondents raise the concern that bringing this land into the productive land base may have adverse affects on wildlife, suggesting it may be habitat for species which have been "forced out" of the rest of the forest.

On the other hand, a forest industry submission encourages the exploration of opportunities for bringing problem forest types into the land base. Another forest industry submission warns that some of the problem forest area is occupied by highly productive non-sawlog stands, and that if these areas are brought back into the timber harvesting land base the interests of pulpwood agreements must be taken into consideration.

Two submissions raise concern over the volume of timber available to fulfill the needs of pulpwood agreements. A submission from the public comments on the pulpwood industry's interest in harvesting timber currently excluded from the land base. The submission states that the forest may not be capable of fulfilling all demands. A submission from the forest industry warns that the Forest Service should ensure that the land base available for pulpwood harvesting does not erode over time.

- **Decadent hemlock**
  Approximately seven million cubic metres of hemlock forests over 140 years old are excluded from the timber supply analysis because they have not been economical to harvest in the past. The *Discussion Paper* suggests that technologies are changing and it may be feasible to include this timber in the timber harvesting land base in the future. Five respondents comment on the decadent hemlock.

One submission from the forest industry states that the decadent cedar/hemlock does not offer an alternative source of supply to sawmills within the timber supply area. This is supported by the major licensee claim that no current manufacturing facilities can economically cut lumber from the scaled sawlog component of decadent hemlock.

On the other hand, another timber licensee expresses interest in harvesting the hemlock forests, stating it has opened a whole log merchandising and log chipping plant in Kamloops, which is tied to a veneer value-added manufacturing facility. Another forest industry submission maintains it is important that access be given to the non-sawlog timber in these forests (which is currently not part of the AAC) in order that these forests be replaced with healthy ones.

Submissions from the general public indicate concern that inadequate research has been undertaken on the utilization of this timber. One respondent opposes the use of hemlock for wood chips.

- **Allowable annual cut adjustment**
  Many suggestions are provided on whether and how the allowable annual cut should be adjusted. This input ranges from two suggestions that there should be no reduction, to three comments indicating that the allowable annual cut should be reduced in order to protect biodiversity and other forest values.

The major licensees insist that the current allowable annual cut is an irreplaceable fibre source for timber supply area mills. They maintain that the current allowable annual cut is sustainable for 80 years and oppose any reduction.

On the other hand, BC Environment staff recommend a significant reduction in order to protect biodiversity. Another respondent suggests the priority in setting the allowable annual cut should be to maintain biodiversity. A third respondent suggests setting the lowest harvest level that is feasible. Two respondents recommend that the priority should be to

consider the long-term sustainable harvest rate and that economic and social objectives should be secondary to this.

Three respondents comment on the idea of a partitioned cut. One suggests providing an opportunity for a partitioned cut in age classes 3 and 4 stands (fir and pine) in order to capture mortality. Another forest industry submission suggests a partitioned cut of 100,000 to 120,000 cubic metres be set for age classes 8 and 9 hemlock stands, which are currently excluded from the timber harvesting land base. The submission estimates that with a two-pass logging approach and a 15-year green-up period, this volume could be harvested within 30 years. The major licensees submit that if there is a need to set a partitioned allowable annual cut, it must be structured so that it does not impair the existing alternative utilization. The licensees discourage the consideration of overlapping tenures.

## Additional Comments

Additional comments noted by respondents are summarized here to indicate general perspectives on timber supply related issues.

A number of respondents comment on the Kamloops Timber Supply Review process. A submission from BC Environment states the Kamloops process was one of the most forthright and balanced in the BC Environment sub-region. A forest industry submission describes the Kamloops Timber Supply Review as a conservative reflection of current management practices. A public submission expresses satisfaction with the Kamloops Timber Supply Review process.

Another submission criticizes the timber supply analysis as being difficult to understand and impossible to assess for accuracy. The submission maintains there are a number of uncertainties in the review and contends that, without a concise inventory, the review is based upon "pseudo-economic" factors.

Another submission states it is difficult for the general public to assess the information presented in the review. The public has no choice but to trust the figures.

One submission declares that, in determining a sustainable harvest level, deductions should be made to account for the effects of the Protected Areas Strategy and Forest Practices Code.

Two respondents recommend that a greater proportion of the existing allowable annual cut be allocated to value-added manufacturers.

Two submissions comment on the size of the Kamloops Timber Supply Area. One questions how it is possible to manage such a vast area effectively. The timber supply area should be divided into smaller units with separate allowable annual cuts established for each unit.

## Input Received through the Land and Resource Management Plan

A large number of comments call for either no reduction to the allowable annual cut or else a minimal reduction. These comments are usually made with regard to the economic and employment impacts of reducing the amount of timber available for harvest. Other comments call for the reduction of the allowable annual cut for environmental reasons.

Remarks concerning the positive and negative environmental impacts of current logging practices are expressed frequently.

Several suggestions urge the replacement of clearcut logging with selection logging. Comments are also made about using improved silviculture practices to enhance timber yields. The importance of adequately restocking areas is also frequently mentioned.

A few individuals recommend a greater emphasis on value-added manufacturing to reduce the dependence of the economy on the primary resource and to preserve jobs in the event of a reduction in the allowable annual cut.

Responses regarding management for visual quality are mixed. Some people feel the guidelines for meeting visual quality objectives are too restrictive. Others comment on the importance of visual quality to tourism.

# Appendix 1

## Submissions received by the Kamloops and Clearwater Forest Districts

**Government agencies**
Ministry of Environment, Lands and Parks, Habitat Protection - Kamloops

**First Nations**
Shuswap Nation Tribal Council
Neskonlith Indian Band

**Industry**
Licensee analysis commissioned by Kamloops Timber Supply Area major licensees—Ainsworth Lumber Co. Ltd., Bell Pole Co. Ltd., Gilbert Smith Forest Products Ltd., International Forest Products Ltd., Riverside Forest Products Ltd., Slocan Forest Products Ltd., Tolko Industries Ltd. and Weyerhaeuser Canada Ltd. (Analysis performed by Timberline Forest Inventory Consultants.)
Weyerhaeuser Canada Ltd., Kamloops
Tolko Industries Ltd., Louis Creek
Interior Lumber Manufacturers' Association, Kelowna
International Forest Products Ltd., Adams Lake
Ainsworth Lumber Co. Ltd., Savona
Gilbert Smith Forest Products Ltd., Barriere

**Interest groups**
Kamloops Naturalists Club

**Individuals**
1 written submission
10 response forms