Kamloops Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests

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This is a summary of the public input 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 (TSA), two opportunities were provided for public input. The first followed release of the Kamloops TSA *Data Package* and *Information Report* in November 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Kamloops TSA. A 30-day review period, ending December 11, 1998, was provided for the public to comment on these documents.

On July 12, 2001, the British Columbia Forest Service released the *2001 Kamloops Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended September 11, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Kamloops TSA. 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 Protection of Privacy Act*) can be reviewed at the Clearwater Forest District in Clearwater and the Kamloops Forest District office in Kamloops.

Public Review Process and Response

Staff from the two forest districts in the TSA, as well as Kamloops regional staff, actively solicited public input on the Timber Supply Review in the Kamloops TSA through the following actions:

- more than a hundred copies of the *Data Package, Information Report, Analysis Report* and *Public Discussion Paper* were mailed to stakeholders in the TSA, including First Nations, licensees, local governments and environmental groups. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at the two district offices and the Kamloops regional office in Kamloops. About 40 copies of the documents were picked up or mailed out.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. Interviews were conducted with the local radio and newspaper.
- a meeting regarding the *Data Package* was held with TSA licensees on January 11, 1999, and periodic meetings with them have occurred since that time.
- the releases of the *Data Package* and *Analysis Report* were discussed at 17 Local Resource Use Plan meetings and further in-depth reviews were offered. No requests were received.
- local politicians were briefed on both documents.
- referrals were made to the Ministry of Forests website where documents were available to download.

The forest district and regional offices received 11 written submissions on the *Data Package* and 10 submissions on the *Analysis Report* (see Appendix 1).

Public Input

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

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors
Two forest industry submissions question whether the areas proposed under Goal 2 of the Protected Areas Strategy are removed from the land base.

The Weyerhaeuser submission (on behalf of the TSA Committee, which includes the Shuswap Nation and other licensees) says the current operability lines are dated and need to be reviewed prior to evaluating biodiversity impacts.

The Shuswap Environmental Action Society (SEAS) and the Yellowhead Ecological Association (YEA) note that Table 16 shows how little cedar-hemlock has been logged since the last determination when these stands were added back into the operable land base. If they are not being logged, the groups say these stands should be removed; otherwise their inclusion increases pressure on the rest of the land base. These types have high ecological values as old-growth forests and should remain unlogged if possible, according to these submissions. They add that there is little benefit to anyone to force companies to log uneconomic timber.

YEA and SEAS say any deferred areas should be removed from the land base now and added back in the next Timber Supply Review if a decision is made to include them. YEA says the Vavenby pine forest, Mount Olie and the Cook Creek protected areas need to be deferred because the Kamloops Land and Resource Management Plan (LRMP) recommended some protection of these areas.

Environmentally Sensitive Areas
The submission from BC Environment says the *Data Package* should clarify that Environmentally Sensitive Areas (ESAs) are to be phased out and/or replaced by new and better data from fieldwork. The agency also says that ESAs cannot all be assumed to be inoperable for long, given technological changes in milling and harvesting. This leads to a concern that previously undisturbed wildlife habitat types may be logged, complicating habitat management, according to BC Environment.

The Weyerhaeuser submission says the Forest Practices Code and the Kamloops LRMP eliminated the need for both recreation and water ESAs. The company questions what terrain hazard data is available and what mapping has been done of harvesting in ESA1 and ESA2 classifications (high and moderate sensitivity, respectively).

SEAS and YEA say terrain stability maps should be added to the data base, replacing Es1 and Es2 mapping, since they are more accurate. They also question why there are no reductions for Es2 (moderate soil sensitivity) areas, noting that other TSAs have used a partial netdown. YEA expresses concern about the inclusion of all ESA2 areas in the timber harvesting land base (THLB), noting that climate change, clearcutting, landslides, flooding and stream channel changes can all remove these sites from the THLB or change them to ESA1.

Currently Unharvested Forest Types
Weyerhaeuser questions the criteria used to exclude some of these types from the THLB:

- the criterion of a site index less than or equal to eight should only apply to stands younger than 80 years.
- licensees are now harvesting in older balsam-spruce stands with a crown closure

- of 26-35 percent. The criterion should be revised to 25 percent crown closure or less.

Pulpwood Agreement 16 Stand Types
Four forest industry submissions comment on the definition of stands contributing to Pulpwood Agreement (PA) 16. Their comments include:

- the re-definition of these stands seriously erodes the short- and long-term timber supply by eroding the contributing land base by about 50 percent.
- the original 1981 definition should be used, as it has been in other TSAs, or the criteria should be negotiated and finalized by Ainsworth Lumber Co. and the Ministry of Forests.
- whatever the definition, a minimum of 55 percent of the allocation to PA16 must be from within the Kamloops Forest Region. This contribution must not be reduced unilaterally, creating increased pressure in other areas.

SEAS and YEA say if no harvesting is occurring, the marginal timber inside PA16 should be excluded from the cut.

Roads, Trails and Landings
Tolko questions why the estimate for future roads, trails and landings is 7.4 percent when the estimate for existing ones is only 5.9 percent. Weyerhaeuser asks to review the data used to arrive at these estimates and questions how the current practice of rehabilitation and/or planting of roads is incorporated.

Forest Inventory
SEAS and YEA note that the results of recent inventory audits are not included, and say any results of volume-ratio sampling should be incorporated. The groups say that since companies regularly log the highest volume stands first, it follows that the remaining stands should have less volume per hectare and this should be reflected in the analysis.

Expected Rate of Growth
YEA says the growth intercept method of estimating site productivity should not be used when plantations are artificial, of a single species, or consist of species with historical health problems.

SEAS and YEA question the source of the operational adjustment factors used in Table 18, and ask why they aren't larger in older harvested blocks to reflect less stringent stocking control and greater soil degradation that occurred pre-Forest Practices Code.

YEA says volume projections should consider not only density, species and the number of free-growing trees but also rates of pest and disease damage, and provides examples. The group identifies other impacts that should also be considered, including increased windthrow and sunscald at the edges of most clearcuts, climate change inducing more frequent and severe thunderstorms, high frequency of wildfire in some types, and avalanching and snow creep on steep clearcuts.

Minimum Harvestable Age
YEA says the minimum harvestable age (MHA) should generally be based on culmination age. The group says the concept of an ecological rotation is based on extensive studies of nutrient cycling in BC forests; this approach is consistent with the LRMP and should be used in the timber supply analysis.

Weyerhaeuser says stands should become eligible for harvest when they meet the minimum age or volume requirement. The company also suggests dropping the MHA for most types to 70 years.

Regeneration and Silvicultural Factors
Weyerhaeuser suggests reducing the regeneration delay for several analysis units to two years.

SEAS and YEA question the assumption that backlog not satisfactorily restocked (NSR)

areas will be restocked by the year 2000, given decreases in funding to Forest Renewal BC and the Ministry of Forests. YEA also says a portion of the backlog will not become free-growing with preferred species, due to inappropriate use of mechanical site preparation and planting (details provided).

Weyerhaeuser says figures for current NSR should not be considered in the analysis, as the regeneration delay component of the yield curve covers this factor. Areas designated current NSR should be assigned yield curves effective from the date of harvest, according to the company.

SEAS and YEA question why silvicultural systems in the *Data Package* do not include uneven-aged stands, even though selection systems are used extensively in the Kamloops Forest District and the last AAC determination recommended inclusion of this type of management in future Timber Supply Reviews.

Harvest Sequence
YEA says the rationale for giving harvest priority to old forests is not explained or justified. This assumption is unsound, YEA says, because, according to the *Biodiversity Guidebook*, old seral forests in landscape units with intermediate and high biodiversity emphasis are to meet certain objectives.

Visual Quality
SEAS and YEA say the green-up heights seem far too short to effectively provide visual green-up. YEA adds there are no published attitude surveys that support these heights (see USDA and Nelson Region studies), and the LRMP guidelines were intended to introduce more retention and the use of selection silviculture to meet visual quality objectives (VQOs).

Weyerhaeuser requests more information on visual management, and says the lake management buffer VQO is limited to the portion of the 200-metre zone that is visible from the designated key viewpoints, so harvest requirements should only apply to that portion.

Recreation and Cultural Heritage
The Kamloops Naturalist Club says an assessment is needed of the different types of recreation currently available and how they could be expanded without being impinged upon by logging operations. The group says considerable potential exists for fishing camps and other types of back-country recreation.

Weyerhaeuser says a sensitivity analysis should be done using the current cultural heritage data and/or traditional use studies.

Riparian Management
BC Environment questions how lakes and small streams are handled in Table 10 (estimates for riparian reserve and management zones), and asks for clarification.

Weyerhaeuser suggests changes to S4 classifications and says applying 10-metre reserves to smaller wetlands is not current practice or a Code requirement. The company says the basal area retentions noted for riparian management zones (Table 10) are maximums, and actual practice ranges from zero to these maximums.

Watershed Management
The Kamloops Naturalist Club says the protection of watersheds is extremely important, for local users and the overall functioning of these ecosystems. The club says studies are needed on the impact on the Thompson River system of water runoff from clearcuts after heavy snowpacks and a rapid spring runoff.

Weyerhaeuser says community watersheds do not have a 20 percent equivalent clearcut area (ECA) restriction; they say that threshold triggers further analysis which can permit further harvesting. The company says a 30 percent ECA restriction would be more realistic.

SEAS and YEA make several comments about watershed management, including:

- ECA constraints for high value fisheries watersheds should also be modeled. Suggest using 25 percent ECA.
- watershed ECA constraints should be modeled for domestic and irrigation watersheds that are not legal community watersheds.
- work by Dave Toews (Ministry of Forests, Nelson) has shown that nine metres is likely insufficient for hydrological green-up.
- it's unclear how 20 percent ECA less than nine metres in height above the H60 line translates to ECA 25.2 percent less than 6.6 metres in the watershed overall. Modeling 20 percent less than nine metres in the whole watershed is likely closer in impact to what will be implemented on the ground, and accounts for other potential soil and terrain constraints.
- the 20 percent ECA criterion has a scientific justification; increased discharge occurs when the ECA reaches this level.

Wildlife Tree Patches

BC Environment says that using wildlife trees and wildlife tree patches (WTPs) may be a reasonable attempt to model current practices, but it doesn't account for the reduction in these stand level requirements that will occur when old growth management areas (OGMAS) are finalized in the next few years. This submission says the reduction in WTPs is important since it will allow more OGMAs to be established within the four percent impact cap set by the Kamloops LRMP. A note of caution on this point is needed, according to BC Environment.

Wildlife Management

BC Environment says the use of 150 years as the minimum mature cover age for caribou habitat management is, according to the Kamloops LRMP, only acceptable if it can be shown that adequate habitat containing caribou attributes would be left after logging of the second pass. Weyerhaeuser says 150 years is the harvest age not the minimum age for mature cover. The latter is a function of old-growth attributes (arboreal lichens) and 120 years is more appropriate, according to the company.

The Kamloops Naturalist Club says a complete inventory of both wildlife and their habitats is necessary, along with an outline of steps necessary to protect them during logging and road construction.

BC Environment says the regeneration assumptions in the *Data Package* signify significant tree species conversion and do not account for the following risks to wildlife biodiversity:

- removal of fir and cedar from stands eliminates a key nesting tree, a deer food source and a source of coarse woody debris.
- balsam and hemlock provide live snag features earlier than the species replacing them.
- conversion to monoculture increases the risk of epidemic disease and large fires.
- global warming might suggest a preference for drought tolerant species.
- wildlife habitat management zones and deer winter ranges have plans based on a continued mix of tree species.

BC Environment says broad-scale tree species conversion, including introduction of species like larch and hybrid poplar, is a high risk strategy for wildlife biodiversity. Modeling this conversion as a sensitivity would clarify whether it is being used to raise the long-term harvest level and also help to measure its costs to wildlife.

YEA says the LRMP-approved critical deer areas need to be revised as a result of expanding deer populations and changes in the location and condition of critical habitat. The group says the presence of critical moose and grizzly bear habitat where well known should be accounted for in the analysis, as this habitat requires sensitive management.

Landscape Level Biodiversity
SEAS and YEA make several comments on the assumptions used to model landscape level biodiversity, including:

- what is the source of forest cover data for parks and is it reliable?
- how can type identity 8 areas (no typing available) contribute to biodiversity requirements?
- it's unclear how WTPs can contribute to seral-stage requirements. Because they are small in size, they're unlikely to contain interior forest conditions.
- significant unsalvaged losses are likely to occur in the inoperable and protected areas that contribute to biodiversity. At a minimum, a sensitivity run is needed to examine the potential impact of stand-replacing events in the inoperable. It's unclear if the model grows stands in the inoperable forever.
- protected areas are not being used correctly to contribute to biodiversity seral stage requirements. If they are to be counted, then the old-seral requirements (Table 22) should be increased to compensate for the fact that these requirements are based on the assumption of 12 percent old growth in protected areas. See the *Biodiversity Guidebook*.

First Nations
In the first of two submissions from the Shuswap Nation Tribal Council, Chief Arthur Manuel raises two main concerns:

- given the current gaps in information regarding cultural resources, traditional uses and wildlife inventory, it will not be possible to manage for and protect Secwepemc interests. Determination of an AAC without consultation will infringe upon their title and rights and may be the subject of compensation claims.
- due to the failure to consider the Delgamuukw decision in the Timber Supply Review process, the tribal council must oppose it. Resource allocation decisions in the absence of proper consultation and the informed consent of the tribal council will be treated as a breach of the Crown's fiduciary duty, and will be contested as such.

In this submission, Chief Manuel requests a meeting to discuss their priorities and concerns, and says they need funding to deal with these issues and they are prepared to submit a budget.

A second submission from the Shuswap Nation Tribal Council notes the lack of complete resource inventory and traditional use data, and says the province has a duty to consult with First Nations on issues of infringement of aboriginal rights and title. This submission also says an analysis focused and based on large-scale timber extraction is a narrow approach.

Unsalvaged Losses
Weyerhaeuser says the volume losses assigned to defoliators must be substantially reduced because the hemlock looper losses in the North Thompson are limited to partitioned cedar-hemlock stands and are part of the harvest profile there. As well, the company says the volume left in reserves from the Frogmoore Fire should not be considered unsalvaged losses but should be attributed to the biodiversity analysis impact.

SEAS and YEA make three comments on this topic:

- losses in plantations that have been partly or completely destroyed by weevils and root rot should be reflected in the long-term timber supply.
- there is no indication of the overall impact of root disease, although this was identified in the last AAC determination as an issue requiring study.
- recommend a sensitivity analysis on the effects of climate change, as recent fires and increased insect infestations are already having an impact.

Timber Supply Area Analysis Report

Pulpwood Agreement 16
A submission from Ainsworth Lumber Co. says they are part of a working group within the Kamloops and Cariboo forest regions to clarify management issues for Pulpwood Agreement 16, and ask that the issue of apportionment be considered in this timber supply analysis. On a regional level, the company recommends a 45/55 split between the Kamloops and Cariboo regions respectively, based mainly on timber availability shortfalls in the Lillooet TSA. On the issue of TSA apportionment, Ainsworth proposes an increase in the allocation for the Kamloops TSA from 86,000 cubic metres to 125,000 cubic metres, due to the stable timber supply.

Cedar-Hemlock Partition
Two forest industry submissions comment on the cedar-hemlock partition. Gilbert Smith Forest Products expresses concern about the future of their non-replaceable forest licence, saying this partition licence has been their mainstay. The company says they have operated successfully in cedar-hemlock stands for the last 34 years and have put these stands back into the timber supply, and they are deeply disturbed by the absence of any helpful direction in the *Analysis Report* regarding the future of their company.

Meeker Log and Timber says the cedar-hemlock partition forest licence provides the only secure fibre for their plant in Kamloops. The company is confident suitable fibre will remain at the end of the current licence term, and asks that the chief forester apportion that volume in a seamless manner for operations currently holding a partition forest licence. The company also notes that the 1996 Rationale anticipated that harvest of old cedar-hemlock types could help control the level of insect infestation and asks if this benefit was incorporated into the analysis.

Deciduous Forest Types
In a second submission, Ainsworth Forest Products expresses interest in unallocated deciduous-leading timber on conventional operable ground in the Kamloops TSA, noting these stands are currently excluded from the harvesting land base. The company provides details of a planning exercise that identified about 22,000 hectares of deciduous-leading stands, half of which are currently available for harvesting. Ainsworth says the majority of the volume would be used at their OSB plant in 100 Mile House, but higher quality logs would be sold to other users, thus maximizing full log profile utilization. The company also says harvesting and reforesting will increase biodiversity and the amount and diversity of wildlife habitat.

Roads, Trails and Landings
An individual submission expresses concern about the vastly increased area projected for roads, noting various problems associated with roads (erosion of wildlife habitat, increased vehicle access, spread of noxious weeds, and disruptions to hydrological processes). This individual says that although he dislikes clearcuts, he would favour larger ones if it meant fewer roads.

Site Productivity
Meeker Log and Timber's submission refers to Table 4 (Average analysis unit site index based on forest inventory and OGSI information) and questions the significance of increasing the site index for old-growth stands up to the date of harvest and then projecting growth at the lower inventory site index rate. The company asks if this pre/post harvest variance skews the assumed contribution to the AAC from harvesting old cedar-hemlock stands.

Silvicultural Systems
The licensees' submission (from Bell Pole, Riverside, Smith, Tolko and Weyerhaeuser) questions the rationale for increasing selection harvesting from 1800 cubic metres per year to 4900 cubic metres per year.

Visual Quality
An individual submission expresses the opinion that it is dishonest to engage in "viewscaping," saying he sees no reason why tourists and residents should be sheltered from the ugliness of clearcuts and other logging practices.

Riparian Management
The Department of Fisheries and Oceans (DFO) expresses concern that the netdown for riparian areas may not reflect the retention required to protect stream ecosystems, particularly small fish-bearing streams and direct tributaries. In order to ensure protection of fish habitat, DFO has previously recommended that retention should approach 100 percent within the riparian management zones of S4 streams and of S5 and S6 streams that are directly tributary to fish-bearing streams.

The submission from the Skeetchestn Indian Band expresses full support for DFO's recommendations and asks how these will be accommodated in the timber supply analysis. The band says they are opposed to clearcut harvesting within 100 metres of any riparian feature and strongly opposed to any harvesting whatsoever within 20 metres of any riparian feature. The band recommends that a maximum of 50 percent of the volume within 100 metres of any riparian feature (including all S6 streams and all wetlands) be harvested in a single pass, in order to protect hydrologic function and the fishery.

The submission from BC Environment suggests that confusion arising from the wording of the *Riparian Management Guidebook* has resulted in the percentages for volume retention in riparian management zones being underestimated by half. The agency provides an analysis that demonstrates the riparian impact was underrepresented by 17 percent, leading to the need to reduce the timber harvesting land base by 3703 hectares. BC Environment strongly suggests this downward pressure on timber supply be corrected.

Wildlife Protection
In the absence of federal or provincial legislation for habitat preservation for endangered species, an individual submission says that OGMAs and WTPs must be implemented to the fullest. This individual expresses concern that the 11 percent increase in the AAC in 1996 means that habitat protection has been compromised already and will be further threatened following this Timber Supply Review.

Landscape Biodiversity
The licensees make several comments on this topic:

- what is the purpose of assuming that stands older than 250 years in the non-timber harvesting land base (NTHLB) were 250 years old at the start of the analysis?
- landscape biodiversity objectives are specified by the *Biodiversity Guidebook* (subject to timber supply impacts) and not by the *Landscape Unit Planning Guide*.
- the assumption of no disturbance in the NTHLB over time (Figure 14) does not reflect the reality that stand-replacing events will occur there. It is more realistic to assume that the current NTHLB age class distribution reflects what will occur over time. This is a key element in modeling old seral requirements.
- for the purposes of modeling, basal area retention targets in riparian management zone were converted to reserves, but these equivalent reserve areas should not be considered to meet old seral requirements.

The submission from Gilbert Smith Forest Products says there has never been a rational justification for applying biodiversity guidelines to all parts of the TSA. The company says adequate provision can be made if the TSA is considered as a unit and adjustments are made for the contribution of non-commercial types and parks. The company says the harvest will have to be reduced 15 to

20 percent generally, and even more in cedar-hemlock types, if the regulations are implemented as written.

BC Environment recommends that any source of uplift to the AAC (e.g., use of OGSI, continuation of the cedar-hemlock partition, changes in operational adjustment factors) be examined carefully for adverse effects on biodiversity requirements (full old and mature seral retention, wildlife tree retention). The agency says that right now the provisions of the *Biodiversity Guidebook* can be fully implemented while meeting the timber supply impact specified in the Higher Level Plan.

With regard to proposed stand conversions (balsam, cedar and hemlock to spruce, fir and pine), BC Environment says these conversions reduce the recruitment of suitable wildlife trees in stands and limit the creation of OGMAs where they are dynamic on the landscape. The agency says the Higher Level Plan refers to retention of the diversity of forest tree species and asks how this concern is accounted for in the analysis, noting this is likely a downward pressure on timber supply.

Other Comments

Many submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Kamloops Naturalist Club says the process must be more transparent and expresses the opinion that too much emphasis is placed on the loss of logging jobs rather than on opportunities from intensive forest practices and jobs from other forest values. The club says a spatial analysis is needed, as well as GIS mapping, and that the AAC determination and forest management must be based on small sustained yield units to allow the process to be more sensitive to local conditions and to promote economic stability.

BC Environment says the use of the term "current" is confusing unless it is defined. The agency strongly recommends it be given a start date, such as December 1997.

SEAS and YEA identify several areas that are missed from the list of special resource management zones (Table 1 of the *Data Package*). As well, YEA says a new category should be identified for problem forests where events such as frequent wildfires, regeneration problems, avalanching, pest damage and windthrow are found to be historically high after previous silvicultural activities.

Weyerhaeuser (on behalf of the TSA Committee, which includes other licensees and the Shuswap Nation Tribal Council) poses numerous questions about analysis unit definitions, the application of yield curves, and many other topics.

An individual says some adjustments should be made for the future effects of climate change.

BC Environment notes significant improvements in clarity and readability of analysis reports, but says there is still room for improvement in converting the implications of sensitivity analyses into a picture of future impacts on timber supply and on biodiversity and habitat issues. The agency provides a list of concerns for biodiversity and habitat for the next Timber Supply Review, given indications in the *Analysis Report* of sources of future upward pressure on the AAC.

Management Practices and Tenures

The Kamloops Naturalist Club says silvicultural systems must be expanded to include more intensive practices of harvesting, not just extensive clearcutting. The club also says the TSA should be managed as two separate units, one for each forest district, to increase efficiency and accountability. The club also says more timber should be available to

value-added operations and recommends operation of a log market, such as in the Vernon Forest District.

An individual submission says greater efforts must be directed to biological control and other forms of management to control the mountain pine beetle, as it is unlikely that sufficiently cold winters to decimate the population will occur and we cannot continue to mow down pine forests ad infinitum.

A submission from Bondar Forest Planning Inc., on behalf of Caverhill Lodge, outlines a proposal for a fixed area tenure to manage the important lake area around the lodge on a sensitive and sustainable basis. According to this submission, the proposed tenure would be similar to a Community Forest Licence, but would include management responsibility for other resources such as wildlife, fisheries, water and range. While acknowledging the forest district does not have the authority to issue such a licence, this submission says the proposed licence fits with many other government initiatives and is part of the solution for the Provincial Review currently underway. The company also says this tenure would assist with negotiations regarding softwood lumber tariffs as this timber would become part of an open log market.

Harvest Levels

BC Environment says any increase in the AAC comes at a cost to biodiversity and riparian protection, and should not be supported.

Appendix 1

Submissions received by the Kamloops and Clearwater Forest Districts

Submissions received on the Data Package

First Nations
Shuswap Nation Tribal Council (two submissions, Dec. 1, 1998, and Jan. 6, 1999)

Government agencies
B.C. Environment

Forest industry
Weyerhaeuser Canada (on behalf of some licensees and the Shuswap Nation Tribal Council)
Williams Lake TSA Association
Ainsworth Lumber Co. Ltd.
100 Mile House TSR Licensees Working Group
Tolko Industries Ltd.

Interest groups
Yellowhead Ecological Association
Shuswap Environmental Action Society
Kamloops Naturalist Club

Submissions received on the Timber Supply Analysis Report

First Nations
Skeetchestn Indian Band

Government agencies
BC Environment
Fisheries and Oceans, Habitat Enhancement

Forest industry
Ainsworth Lumber Co. (two submissions, July 25 and Oct. 3, 2001)
Weyerhaeuser Co. Ltd. (on behalf of Bell Pole, Riverside, Smith, Tolko and Weyerhaeuser)
Gilbert Smith Forest Products Ltd.
Meeker Log and Timber

General public
two individual submissions