

Kispiox 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 Kispiox 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 Kispiox Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and a technical report, the *Timber Supply Analysis*. The *Socio-Economic Impact Assessment*, prepared in 1992 for the Kispiox Land and Resource Management Plan table, was also made available.

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 45-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Kispiox 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 original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Kispiox Forest District office in Hazelton.

Public Review Process and Response

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

- approximately 110 copies of the *Timber Supply Analysis* and the *Discussion Paper* were mailed to First Nations, MLAs, forest companies and members of seven Kispiox Forest District planning committees. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- one information session was held for First Nations representatives
- the availability of the documents at the district office was advertised in the local radio and newspaper and in public notices; these also stated that staff would be available for discussions with the public from Oct. 9 to 23
- newspaper articles were encouraged and one was published

The Kispiox Forest District received five completed response forms and 11 written submissions (see Appendix 1).

Public Input

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

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

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

Timber Supply Analysis

A range of input was received regarding the timber supply analysis conducted by the Forest Service. The input is summarized under the following topics:

- **harvest profile**
Four respondents comment on the extensive backlog of older, decaying forests that has resulted from past high-grading. They state that these forests need to be replaced with young, healthy stands and add that the problem this creates for future timber supply is not fully acknowledged in the timber supply analysis.

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The Gitksan Treaty Office says the proportion of sawlogs in the harvest (65 per cent) exceeds the proportion of sawlogs in the inventory (54 per cent). In their opinion, the timber supply area is being high-graded and overcut because of sawmill overcapacity.

- **estimates of growth and volume**

One individual submission questions the assumption that productivity will be maintained through several harvests, given the loss of soil fertility with each rotation.

Another respondent believes the net volumes achievable from forests over 200 years old in the northern part of the timber supply area are overestimated by about 25 per cent. He says that, in his experience, the factors used to reduce volume for decay, waste and breakage are insufficient for these forests.

Another submission states that information presented to the Kispiox Harvest Level Committee in 1992 indicated volume estimates for hemlock were 24 per cent higher than actual harvested volumes. This indicates a reduction of 15 per cent in available timber, according to the respondent.

An industry submission states that in the Bulkley Forest District, use of the biogeoclimatic classification system to estimate productivity produced a 25 per cent increase in long range timber supply, compared to productivity estimates based on inventory data.

- **size of the timber harvesting land base**

One industry respondent agrees with the size of the timber harvesting land base used in the Forest Service analysis.

An individual response says it is not acceptable to assume that problems in accessing undeveloped portions of the timber harvesting land base north of the Babine River can be compensated for by continued overharvesting in the southern portion of the timber supply area.

- **deductions for roads and landings**

According to one submission, recent research reports indicate that, relative to the Forest Service analysis, a much greater deduction is required for loss of productive land to roads and landings, as well as for not-satisfactorily-restocked areas.

- **commercial thinning**

One individual expresses surprise that the Forest Service analysis anticipates very little volume from existing stands younger than 50 years. He says early investment in spacing and commercial thinning can increase the final merchantable volume, as well as improving species selection and stand health, and increasing windfirmness.

- **utilization**

One respondent notes that pulpwood is left on site and/or burned because it is not economical to ship to the pulpmill in Prince Rupert. He sees the need for a higher-value processing facility for pulpwood (such as oriented strand board), as well as for obtaining higher value from sawlogs.

- **wildlife habitat**

One submission asserts that wildlife studies in the timber supply area are very sketchy and only look at a very few species.

Another respondent says grizzly habitat must be assessed immediately since bears adapt more poorly to harvesting than do other animals, such as deer and moose. According to this submission, short-term job losses from habitat protection may result, but in the long term forestry and tourism can co-exist if prime habitat is treated very sensitively, particularly in the area north of the Babine River.

- **visual quality objectives**

One individual suggests that preservation should be an option to protect visual quality. Although portions of highway corridors can be logged without severe impact, others cannot and should be acknowledged as unlikely to contribute to timber supply.

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An industry submission questions the 1115-year rotation used in areas designated for retention visual quality management in the Forest Service analysis. The company believes the maximum biological life span of all species in the timber supply area is far less than 1000 years and questions whether a 1000-year rotation is even possible, let alone a good idea.

- **maintaining older forests**

Two submissions express the opinion that the Forest Service analysis doesn't provide for protection of sufficient area of older forests, while a third believes the area is excessive.

One individual says old-growth values appear not to have been factored into the timber supply analysis. If forests outside the timber harvesting land base contribute one-half of the required old growth, the other half still needs to be included in the analysis, according to this submission.

Another submission contends that the goal of 12 per cent deferral should not be provided by dispersed forests outside the timber harvesting land base but by contiguous forests designated as part of total chance planning. To do otherwise contravenes the Kispiox Land and Resource Management Plan, according to the respondent.

An industry respondent states that, of the forested area removed from the timber harvesting land base because it is environmentally sensitive or uneconomic to harvest, 23 per cent has forests older than 250 years. The company points out this is twice the 12 per cent requirement and four times the area assumed by the Forest Service analysis to be older than 200 years. Over the next 60 years, this 23 per cent will increase to at least 41 per cent, according to the submission.

- **maintaining biodiversity**

One submission questions why only 4.5 per cent of the land base was deducted to account for management of biodiversity and riparian areas. This individual says the area to be deducted shouldn't be based on large-scale mapping that misses smaller features or on

current practices rather than the practices required to achieve objectives. According to this submission, the management of biodiversity at a minimum level—in order to limit reductions in timber supply—is inadequate.

In order to achieve both landscape-level and stand-level biodiversity, this individual estimates a 30 per cent reduction in available timber from the timber harvesting land base will be necessary. This estimate is based on experience, literature review and discussions with ecologists.

- **green-up requirements**

One submission states that the Forest Service analysis did not comply with the Kispiox Land and Resource Management Plan. The plan says green-up constraints should be applied on a watershed basis—rather than over the entire timber harvesting land base—in order to protect other resource values and prevent flooding. This approach results in a six-pass harvest system that must be factored into any timber supply analysis.

In addition, the respondent maintains the effects of green-up requirements will be greater than considered in the Forest Service analysis because almost 30 per cent of the land base is less than 17 years old.

Socio-Economic Impact Assessment

Many comments are made on the interaction between timber harvesting and the protection of other non-timber values and uses, and the resulting implications for communities and the local economy. This input is summarized as follows:

- **non-timber values**

One individual says it is essential to find a balance, between, for example, the environmental needs of grizzlies and salmon and those of local residents. He supports a maximum preservation of 10 to 15 per cent of the land base to maintain social and economic stability.

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- **mushroom picking**

Four submissions comment on the importance of the mushroom-picking industry in the Kispiox Timber Supply Area, and two express surprise that this forest resource was not recognized in the Forest Service analysis. According to one individual, the pine mushroom industry contributes \$2-3 million annually to the local economy. Mushroom picking provides more value and employment in older hemlock forests than wood fibre harvesting.

One individual suggests that areas of old-growth hemlock in visually sensitive areas be set aside for mushroom picking, which is a continuous industry. Another respondent says it is important to await the results of the current five-year study, before harvesting known mushroom patches. He says planning is required to protect this industry because mushrooms only grow in older forests, not in clearcuts and young stands.

- **employment stability**

Two respondents express the opinion that the cost of future job losses resulting from current overcutting is not considered in the Forest Service analysis; this price will be paid by the next generation. Instead, reductions in harvest levels need to begin now in order to protect long-term employment, according to one submission. Another individual points to the wide variation in annual harvest volumes in the past decade, saying this does not contribute to community or job stability.

- **tourism**

According to one submission, the current concentration of logging in the southern portion of the timber supply area is rapidly decreasing the possibility of a tourism base for the local economy. He says economic diversity is important, and less emphasis on timber volumes is required.

Another individual points to the high tourism potential of the timber supply area because of access for all types of tourism, from high-end to eco-adventures. Visual quality is an important feature, says this respondent, who

also suggests development of a forest/trail system for both recreation and education on biodiversity.

Discussion Paper

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

- **Timber Supply Review process**

Six submissions comment on the Timber Supply Review process. One maintains that the review is an exciting start but, because the chief forester can be politically influenced, continuing public input is essential. The respondent refers to the Village of Hazelton's *Framework for Watershed Stewardship* and says she sees movement toward the vision contained in the framework (real stewardship of the total resource and the varied uses crucial to people in the area).

Three submissions say the recommendations of the Harvest Level Committee must be met or at least given strong consideration as part of the Timber Supply Review. These recommendations were agreed to by a very diverse, well-informed committee of residents. Two respondents state they are disappointed the Harvest Level Committee's recommendation regarding the allowable annual cut was not considered in the Timber Supply Review, nor were the committee's other recommendations considered or tested in the analysis. One of the submissions contends that if public input is truly desired, the chief forester must give considerable weight to this committee's recommendations.

Another submission says the author doesn't have the time or resources to review the Timber Supply Review documents, nor is it optimistic about its input being effective. It believes that, because of the forest industry's fibre flow requirements, changes to the allowable annual cut province-wide have been capped; therefore key decisions have already been made that limit what can happen in this timber supply area. The respondent adds that it supports the recommendations of the Harvest Level Committee and rejects the Kispiox Consensus

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Management Decisions as too arbitrary, unscientific and discretionary.

Another individual questions whether the scale of planning used in the Forest Service analysis is adequate to permit accurate consideration of other values.

Another respondent asserts that the maintenance of an untenable harvest level reveals the bias of the Timber Supply Review process towards satisfying timber companies' fibre needs. He contends that real alternatives—such as reducing the concentration in the forest industry by providing more woodlots—and their impacts are not considered.

Another submission contends the Forest Service analysis flagrantly disregards the principle of participation in resource developing planning by ignoring the agreements and information in the Kispiox Land and Resource Management Plan.

- **allowable annual cut adjustment**

Many suggestions are provided on whether and how the allowable annual cut should be adjusted:

- four submissions support the base case forecast of maintaining the current annual allowable cut. The reasons cited include the favourable impact on mineral exploration through development of access into new areas in the northern part of the timber supply area. It is also stated that the base case underestimates long-term productivity by 20 per cent

One individual supports the maintenance of the current level if harvesting is emphasized in older stands, and non-productive stands are not removed from current harvesting plans.

- nine submissions recommend a gradual (1 or 2 per cent) reduction in the allowable annual cut, beginning immediately. The reasons include the following:

1. it is preferable to avoid the abrupt change that will occur later
2. it will allow time to prepare people for larger reductions in the future and to encourage alternatives; the availability of Forest Renewal funds is noted
3. this is the recommendation of the Harvest Level Committee, agreed to after extensive study and discussion
4. starting the reduction now will relieve some of the pressure on the land base and allow other activities and other harvesting methods to develop and/or exist
5. maintaining the current allowable annual cut will liquidate old growth and may destroy the basis for alternatives such as tourism
6. fibre needs of industry must not be the determining factor in setting the allowable annual cut
7. uncertainty in the data and assumptions suggests a conservative approach is needed; for example, the analysis talks about over- and underestimating some factors by 20 per cent
8. the effect of land claims settlements is not yet known

- one submission recommends an immediate reduction of 20 per cent, followed by a reduction of 2 per cent per year until the long-term timber supply is reached. This recommendation is based on concern that the Forest Service analysis did not make sufficient deductions from available timber estimates to account for protection of other values.

Another submission says the allowable annual cut should not be subject to sympathetic administration and should be stratified based on timber type, slope and ecological classification. As well, the estimated impacts of aboriginal rights on timber supply should be considered now, rather than postponed to the future.

Related processes

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Comments on other ongoing government processes and initiatives are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Protected Areas Strategy**

One respondent says it is preferable to assume that timber in the Upper Kispiox and Seven Sisters study areas is unavailable for harvesting. Two other submissions say people have worked for 20 years to establish these protected areas and yet the possibility of success is not acknowledged in the timber supply analysis. This may set the scene for a strong reaction from the forest industry, in one individual's view.

Another submission questions the 12 per cent goal for protection, saying that, despite its wide use, this goal has no scientific basis.

- **Forest Practices Code**

One respondent says implementation of the Code must change to a results-driven, rather than regulation-driven, format.

- **land claims**

One submission says it is unreasonable to assume land claims will not be settled or, if they are, that timber harvest opportunities will not be lost.

Another respondent states that the level of allowable timber harvest and the manner in which it is apportioned and licensed have a direct effect on the Gitksan First Nation's exercise of their aboriginal rights.

Appendix 1

Submissions received by the Kispiox Forest District

First Nations

Gitxsan Treaty Office

Local government

Mayor Alice Maitland, Village of Hazelton

Forest industry

Bill Forsyth

Trans-Pacific Trading

Repap Ltd.

Philpot Forestry Services

Interest groups

Smithers Exploration Group

Seven Sisters Society

General public

Eight individual submissions