Mackenzie 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 Mackenzie 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.

Mackenzie Timber Supply Area

Background

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

Public Review Process and Response

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

- copies of the three documents were mailed to 20 individuals, interest groups, businesses and First Nations. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager.
- follow-up phone calls were made to First Nations offering briefing sessions
- three information sessions were held with representatives from the forest industry, local government and a First Nation (see Table 1)
- one extensively advertised open house was held

As Table 1 shows, close to 70 individuals attended the information sessions and the open house. The Mackenzie Forest District also received seven written submissions (see Appendix 1).

Activity (No. of participants)	Date
Information sessions	
District of Mackenzie Council (7)	Sept. 25, 1995
Major licensees (15)	Oct. 13, 1995
McLeod Lake Indian Band (5)	Dec. 12, 1995
Open Houses	
Mackenzie (42)	Oct. 12, 1995

Table 1: Participation in public information activities

Public Input

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

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

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

Timber Supply Analysis

Size of the timber harvesting land base

Much of the public input focuses on the question of how to define the timber harvesting land base, the area considered feasible and economical for timber harvesting. Two submissions state the Forest Service analysis withdrew too much area from the timber harvesting land base in order to address other values and issues, or because of incorrect assumptions. Another submission contends not enough area was withdrawn.

The following specific concerns are addressed:

- **Withdrawal of deciduous forests**
  The Community Task Force maintains that deducting 228 000 hectares of deciduous forest from the timber harvesting land base overlooks two factors:
  - new production facilities in Mackenzie will be capable of using deciduous wood in a mix with coniferous
  - these forests are evolving toward coniferous stands and will therefore have commercial value in the future

  The forest industry submission agrees and adds that excluding deciduous forests at this time is the same as excluding immature coniferous stands until they become harvestable. The industry says the timber harvesting land base could be increased by 20 per cent by including deciduous forests.

- **Deductions from the northern area**
  According to the forest industry and the Community Task Force, the size of the timber harvesting land base in the northern part of the timber supply area was underestimated. Although these forests are a considerable distance from processing plants in Mackenzie, the availability of low-cost towing on Williston Lake now makes them economically feasible to harvest.

  The Ministry of Environment, Lands and Parks questions the use of standards from the southern portion of the timber supply area to assess the feasibility of harvesting in the north. The agency notes significant differences in physical characteristics, growing conditions and timber types, and says use of factors from the southern portion overestimates by 10 to 20 per cent the size of the timber harvesting land base in the north.

  The submission from the forest industry workers' union supports the need for a better assessment of the feasibility of harvesting in the northern area, and questions whether differences between the northern and southern areas were properly accounted for.

- **Exclusion of coniferous forests**
  The forest industry submission contends too much area occupied by coniferous forests was defined as non-merchantable and removed from the timber harvesting land base in the Forest Service analysis. It particularly questions the exclusion of coniferous forests growing on poor sites and the exclusion of residual stands (poorly stocked forests following selective harvesting). The industry submission notes that if only 25 per cent of the area excluded were instead included, this could add as much as 200 000 cubic metres per year to both the short- and long-term timber supply.

- **Area of roads, trails and landings**
  The Ministry of Environment, Lands and Parks asserts the productive forest area lost to roads is significantly underestimated in the Forest Service analysis. The agency's submission recommends the reduction for past roads be at least two per cent of the land base, increasing to four or five per cent for future roads and landings.

- **Changes in economic conditions**
  Two submissions express concern that new technology, higher utilization, higher prices and changing markets are not considered by the Forest Service analysis when defining areas considered feasible for harvesting. These submissions say that economically marginal stands should be included in the timber supply at times of high market prices and low stumpage rates.

  The forest industry submission maintains it is unlikely that any forests in the timber supply area are not feasible to harvest during good market conditions, except where it is physically impossible to construct access roads. An additional 150 000 hectares could be added to the timber harvesting land base by including these commercially marginal areas.

Wildlife habitat

The Ministry of Environment, Lands and Parks notes that 37 per cent of the timber harvesting land base lies in areas with poor and low productivity. This agency's submission states that, because past

harvests have been concentrated on the better sites, retaining the least productive sites in the timber harvesting land base inflates harvest levels and puts pressure on wildlife dependent on forests growing on more productive sites.

Number of harvesting entries
The Ministry of Environment, Lands and Parks' submission maintains that requirements in the Forest Practices Code to protect other values will require four or five harvesting entries. This will significantly reduce timber supply, particularly with the change in the green-up height requirement from 2.5 metres, as used in the Forest Service analysis, to three metres as required by the Forest Practices Code.

The forest industry contends that under a four-pass system, harvesting is unlikely to be distributed at 25 per cent per entry, as indicated in the Forest Service analysis. Rather, the proportions will likely be 35 per cent in the first entry, 25 per cent in the second and 20 per cent in each of the last two entries.

Two submissions express concern about the timber supply reductions that would result from an increase in the number of harvesting entries to five.

Estimates of existing volumes and future productivity
The submission from the forest industry workers' union expresses concern about the lack of new information that would permit an accurate estimate of timber volumes in existing mature forests.

The forest industry submission cites mounting evidence that suggests growth rates for new forests are substantially higher than predicted by current methods. This increased growth is largely due to the fact that existing mature stands began as overstocked forests, whereas regenerated stands are managed for stocking density.

The Ministry of Environment, Lands and Parks states inflated growth rates were used in the Forest Service analysis, based on information from managed stands elsewhere. The agency believes it may not be possible to achieve the 54 per cent increase in overall annual growth indicated in the Forest Service analysis.

Estimate of unsalvaged losses
The forest industry submission contends the estimate for unsalvaged losses should have been reduced over the 250-year period covered by the Forest Service analysis. As older stands are converted to regenerated healthy younger stands, unsalvaged losses should decline to about 80 000 cubic metres per year.

The Community Task Force states that at this time of better wood utilization (smaller top and butt sizes), it is not acceptable to simply acknowledge this level of unsalvaged losses as a plateau, without plans or attempts to reduce it.

Regeneration delay
According to the forest industry submission, the Forest Service offered to analyze the impact of reducing the regeneration delay from three years to two years for lodgepole pine. The industry questions why, instead, an analysis was done on the impact of increasing the regeneration delay to six years for all stands. Reducing the delay by one year would increase both short- and long-term timber supply.

Other harvesting methods
One respondent questions whether the new system of cut-to-length can be used for selective logging and whether this can increase timber supply.

Socio-Economic Analysis

- **Employment and community impacts**
  The Community Task Force maintains that, apart from any adjustments to timber supply in the Mackenzie Timber Supply Area, the local industry is feeling the effects of a shrinking wood supply outside the timber supply area. The task force's analysis indicates that one of the four sawmills in Mackenzie may be at risk, which could threaten the pulp mill also. It points out this would have serious impacts on a community highly dependent on the forest industry.

  The forest industry workers' union submission questions whether rationing of older forests until previously harvested areas

become merchantable will occur and what effect that would have on mills.

The union also questions the statement in the Forest Service analysis that all pulp mill and sawmill workers are local residents, noting that some commute to homes and families in Prince George.

- **Non-timber values**
  The Ministry of Environment, Lands and Parks is concerned that the extensive use of uncertain data results in an overly optimistic projection of timber supply. The agency says this has the potential for significant negative impacts on biodiversity, wildlife and recreation. Specific concerns are:
  - the amount of older forests needed to meet biodiversity requirements is underestimated in the Forest Service analysis
  - a one per cent reduction for riparian areas is insufficient
  - the measures proposed for wildlife protection are inadequate; more areas of restricted harvesting to protect wildlife values will likely be sought by this agency
  - the area identified as visually sensitive is very small

An individual submission agrees with the Forest Service analysis that the Wasi Valley is a visually sensitive zone, but outlines other concerns:

- loss of security for private property with increased logging road access
- negative effects on high quality wildlife habitat from road access
- impacts of logging on fish-bearing streams and lakes

This individual asks that logging be deferred in visually and environmentally sensitive areas until harvest methods are developed and proven to reduce or eliminate impacts on other values.

- **First Nations**
  One First Nation submission notes no treaty was ever signed regarding their homeland and emphasizes their interest in managing their land for the perpetual yield of natural resources. The submission states that overall timber supply may or may not be reduced by the settlement of land claims, since settlement may or may not involve land. About 125 people have hereditary ties to this homeland; an economic base is needed to bring them home from the city, so the availability of a timber supply for First Nations licences and woodlots is important.

This submission also points out that Mackenzie is only 30 years old and expresses the opinion that people living there come and go, with no long-term roots in the community. The opinions of stakeholders whose past and future are tied to the land should take precedence over others, including major licensees.

Discussion Paper

The main issue in the *Discussion Paper* that prompted public input was the determination of the allowable annual cut.

- **Allowable annual cut adjustment**
  In their submissions, the Community Task Force and the forest industry support maintenance of the allowable annual cut at the current level until outstanding land use issues are addressed and better inventory and other data is available. Both groups express optimism about future timber supply levels. The forest industry contends that opportunities exist to increase harvest levels by up to 500 000 cubic metres per year in the short term and up to one million cubic metres per year in the long term.

The Community Task Force says the timber harvesting land base was reduced in the Forest Service analysis in order to absorb future impacts of the Forest Practices Code, Protected Areas Strategy and a Land and Resource Management Plan. The task force says, therefore, the allowable annual cut should remain the same for the next five years, allowing time to identify real impacts.

One First Nations submission states the allowable annual cut must be further reduced to account for the Protected Areas Strategy but does not specify a level. This submission maintains that the determination of an allowable annual cut is ultimately a moral judgement call, since numbers and statistics can be juggled and slanted.

Another respondent expresses strong agreement with the concept that existing forests should not be harvested faster than second-growth forests become available for harvesting, or severe timber supply shortages will occur.

Related issues and processes

- **Timber Supply Review process**
  The submission from forest industry workers concludes the Timber Supply Review process does not fully account for all the impacts of a reduction in timber supply. The need for accurate inventory information for setting timber supply levels is vital.

  The Community Task Force maintains the *Discussion Paper* demonstrates a bias toward the belief that over-harvesting is occurring.

  The forest industry submissions says the *Discussion Paper* misrepresents the actual data analysis. Two examples are cited:
  1. the *Discussion Paper* raises a concern that volumes in existing stands may be overestimated while the T*imber Supply Analysis* itself expresses confidence in these numbers
  2. the impact of changing to a four-pass harvest system was shown to be insignificant in the analysis, yet the discussion paper implies the opposite

- **Treaty negotiations**
  The submission from the Fort Ware Indian Band outlines a proposal for the structure and functioning of a forest management committee that will develop and implement a forest management plan. The band indicates it will support the current timber supply analysis only with implementation of this process. Treaty negotiations will also proceed outside this framework.

Appendix 1

Submissions received by the Mackenzie Forest District

First Nations
Fort Ware Indian Band
Noostal Keyoh Development Ltd.

Government agencies
Ministry of Environment, Lands and Parks, Fish and Wildlife Branch, Prince George

Industry
Finlay Forest Industries Inc. and Fletcher Challenge Canada Ltd.

Interest groups
Pulp, Paper and Woodworkers of Canada
Mackenzie Chamber of Commerce, Community Task Force

Individuals
One submission