Okanagan 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 Okanagan 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.

Okanagan Timber Supply Area

Background

As part of the review of the timber supply in the Okanagan Timber Supply Area, the British Columbia Forest Service distributed a *Discussion Paper* and two technical reports, a *Timber Supply Analysis* and a *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 public review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Okanagan Timber Supply Area.

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 Vernon Forest District office.

Public Review Process and Response

Salmon Arm, Vernon and Penticton Forest District staff actively solicited public input on the Timber Supply Review in the Okanagan Timber Supply Area through the following:

- direct mail-out and distribution of an information release outlining the information contained in the *Timber Supply Analysis* and the next steps in the Timber Supply Review process. An open invitation for interested groups to request a presentation was included
- distribution of 500 copies of the *Timber Supply Analysis*, 675 copies of the *Socio-Economic Analysis* and 1400 copies of the *Discussion Paper*. Written submissions were encouraged and the *Discussion Paper* included a response form which readers were encouraged to complete and return to the district managers
- 35 information sessions were held with representatives from the timber industry, labour, local governments, interest groups and organizations (see Appendix 1)
- extensively advertised open houses were held in Salmon Arm, Vernon and Kelowna
- radio interviews were provided
- newspaper articles were encouraged

Information sessions were held in many of the communities within the Shuswap and Okanagan (see Appendix 1). The three open houses were attended by 345 people.

The Forest Service received 983 written submissions from individuals, businesses, organizations, labour and local governments (see Appendix 2). Timber supply analyses were submitted by the Shuswap Okanagan Forest Association and the Shuswap Environmental Action Society.

The Okanagan Timber Supply Review received a very high level of public interest. This was demonstrated by the number of meetings held, the turnout at open houses and the number of written responses received. Due to the range and volume of public responses received, comments have been summarized.

Public Input

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

- timber supply analysis
- socio-economic analysis
- discussion paper

Public input on related issues and ongoing government processes that may influence the timber supply in the Okanagan Timber Supply Area in the future is also summarized.

Okanagan Timber Supply Area

Timber Supply Analysis

The Forest Service analysis identifies and examines potential impacts on timber supply in the Okanagan Timber Supply Area. Factors such as minimum harvestable age, estimates of existing volumes and forest cover requirements have significant impacts on timber supply forecasts.

Technical input

Technical input was received from the Shuswap Okanagan Forest Association and the Shuswap Environmental Action Society (both of which completed independent timber supply analyses); the Ministry of Environment, Lands and Parks; and the International Woodworkers Association-Canada.

The Shuswap Okanagan Forest Association maintain that their analysis and the Forest Service analysis modelled very conservative approaches to forest management. The association's analysis confirms that, at a minimum, the current harvest level can be maintained until the next allowable annual cut determination is carried out within five years.

However, the association and some forest licensees suggest the Forest Service analysis was too conservative. They submit that the current level can be maintained for much longer than the Forest Service analysis projects and will have to decrease only slightly 90 years from now. This is accomplished by modifying the assumptions used by the Forest Service for:

- estimates of mature volume
- green-up age (the time required for trees to attain a certain height)
- the maximum area allowed to be below green-up height at any time
- minimum harvestable ages

The Shuswap Okanagan Forest Association says each of the above factors extends the current harvest level by 20 to 40 years.

The Shuswap Environmental Action Society suggests the provincial Timber Supply Review process is based on questionable modelling techniques. They advocate an area-based, geographically-referenced analysis. They also suggest analyses should be done for smaller areas, preferably the size of a Forest Service district

The Shuswap Environmental Action Society also completed an independent analysis, using a spatial approach focused on the short-term timber supply for the Salmon Arm District (one of the three districts in the Okanagan Timber Supply Area). Their analysis shows the current harvest level cannot be maintained in Salmon Arm for the next 20 years without having a detrimental effect on other values such as biodiversity, recreation, visual quality and water quality and quantity. The Society's analysis also indicates that if the current harvest level is maintained for 20 years, little forest land will remain for harvesting. The Society concludes that the same conditions apply to the remainder of the Okanagan Timber Supply Area.

Comments were made on the following specific issues in the timber supply analysis:

- **Estimates of existing forest volumes**
  Based on a survey of 175 cutblocks in the timber supply area, the Shuswap Okanagan Forest Association suggests that the Forest Service analysis underestimates existing volumes. A comparison of actual harvested volumes with Forest Service estimates shows the actual volumes to be 11 per cent higher than was estimated. The Shuswap Okanagan Forest Association did not incorporate this increase in mature volume into their analysis.

  In contrast, the Shuswap Environmental Action Society suggests mature forest volumes are overestimated. They state that forest companies have harvested the best quality, highest volume timber and that remaining forests are of a lower quality and volume.

  Many submissions mention the need to update forest inventories and that the issue of volume estimates must be resolved.

- **Estimates of future forest productivity**
  The Shuswap Okanagan Forest Association suggests that the future growth of regenerated forests is underestimated in the Forest Service analysis due to tree species assumptions and the use of site productivity information from overmature forests. In addition, the association suggests that estimating volume projections for regenerated stands should be applied to all forests under the age of 20, not just existing plantations.

- **Size of the timber harvesting land base**
  The Shuswap Okanagan Forest Association states that the reductions used in the Forest Service analysis to account for roads, landings and for riparian areas were too high, and therefore the size of the timber harvesting land base is underestimated.

- **Harvestable ages**
  The Forest Association states that the minimum harvestable age used in timber supply analysis should be based on specified minimum volume and/or piece sizes requirements; other criteria for harvest priority are not acceptable.

- **Forest management practices**
  The Forest Service analysis is based on the current *Okanagan Timber Harvesting Guidelines*. Both the Shuswap Environmental Action Society and the Ministry of Environment, Lands and Parks suggest that it is erroneous to assume these guidelines adequately protect non-timber values.

  Within the Okanagan Timber Supply Area, the timber harvesting land base is divided into management zones on the basis of forest cover guidelines and management practices. In their analysis, the Shuswap Okanagan Forest Association changed the assumptions used in the Forest Service analysis regarding forest management practices in the landscape, wildlife winter range, community watersheds and timber harvest emphasis zones.

  The association also notes that the Forest Service analysis used a very restrictive, artificial harvest and retention pattern. In addition, the Forest Service analysis assumes that oldest forests are harvested first and the association feels this doesn't represent the current practice.

- **Green-up requirements**
  The green-up period is the time required for an area to reach a desired condition after harvest. For the Okanagan Timber Supply Area, the standard green-up requirement is for trees to be eight metres tall to before harvesting is allowed on adjacent blocks to ensure the forest canopy is sufficiently closed to return the area to a fully functioning watershed. The Shuswap Okanagan Forest Association suggests adjacent forests can be harvested earlier by applying partial hydrologic recovery criteria as opposed to the full hydrologic recovery criteria used in the Forest Service Analysis.

  The International Woodworkers Association-Canada notes that timber supply projections are very dependent on the length of green-up periods.

- **Visual quality objectives**
  Management practices, as modelled in the Forest Service analysis, for visually sensitive areas in the Okanagan Timber Supply Area are not accepted by the Shuswap Okanagan Forest Association, individual licensees and the International Woodworkers Association-Canada. The latter suggests no biological reason exists for the 15 per cent maximum clearcut area specified for the Landscape Zone. They note that relaxing this guideline to 20 per cent has a significant effect on short-term timber supply.

- **Watershed management**
  The Ministry of Environment, Lands and Parks submits that there are over 100 watersheds of significance to the province's fisheries program; watersheds identified in the *Okanagan Timber Harvesting Guidelines* and modelled in the timber supply analysis only cover those of concern to Federal Fisheries.

  The Ministry of Environment, Lands and Parks suggests the Forest Practices Code standards for community watersheds

will reduce timber availability and this will affect short-term timber supply.

The Shuswap Environmental Action Society states there are a number of watersheds where maximum permitted clearcut size has been exceeded.

- **Biodiversity and old growth**
The Ministry of Environment, Lands and Parks states that the old growth and biodiversity standards incorporated in the Forest Service analysis do not adequately reflect landscape connectivity, the Protected Areas Strategy or other strategic planning initiatives.

- **Wildlife habitat**
The Ministry of Environment, Lands and Parks notes that Forest Practices Code protective measures for endangered or threatened species have not been adequately considered in the Forest Service analysis.

The Shuswap Okanagan Forest Association states that the Forest Service analysis uses a conservative, artificial harvest or retain constraint to model winter range for deer and related species.

- **Salvage programs**
The Shuswap Okanagan Forest Association promotes existing harvest levels as adequate for control of mountain pine beetle. The Shuswap Environmental Action Society suggests wood volumes harvested to control beetle attacks, along with other salvage harvesting, should be included within the allowable annual cut. They also state that the Forest Service analysis does not indicate the consequences temporary harvest increases have on the environment (as in 1987 to 1993).

The Shuswap Okanagan Forest Association observes that unsalvaged wood volume losses should become lower as forest access improves and forests across the timber supply area become younger.

Other Public Input

- **Data and assumptions**
Many submissions express concern about the quality and interpretation of the data used to create the Forest Service base case timber supply forecast. Of foremost concern is the possibility that the Forest Service methods overly constrain timber supply forecasts.

Some respondents state that forest inventories are outdated and must be updated before the Forest Service is able to make sound decisions. It is also suggested that the estimate of annual tree growth and the proposed harvest age used by the Forest Service are too low, given the high proportion of spruce-balsam forests in this timber supply area. The use of spatial analysis to illustrate future harvesting patterns is suggested.

- **Timber harvesting land base**
Fourteen respondents made suggestions regarding the size of the timber harvesting land base:

  - establish a smaller land base for timber harvesting in order to protect the diverse ecology in the timber supply area
  - increase the land base to lessen the impact of harvesting in special areas and to increase sustainability
  - set limits on the timber harvesting land base; only expand it if the timber companies perform well
  - determine timber supply by individual watershed in order to have a truly responsible ecosystem approach
  - divide the timber supply area into three sustainable units, one for each district
  - incorporate the former Public Sustained Yield Unit into the timber supply area

Socio-Economic Analysis

Technical input
Four groups provided critiques on the *Socio-Economic Analysis*. Their comments are summarized below.

The Shuswap Environmental Action Society states that the Forest Service analysis is flawed and misleading and make the following points:

- the economic predictions are based on an out-of-date model
- the regional forestry-related employment estimate is too high and the estimates in the *Socio-Economic Analysis* exaggerate potential job losses
- population statistics are out-of-date and don't provide an accurate employment picture
- the *Socio-Economic Analysis* doesn't recognize Salmon Arm's increasing population and increasingly diversified economy
- social programs and their mitigating effects are not included in the impact projections
- value-added trends are not adequately discussed
- higher stumpage rates could easily offset the loss in revenue which would result from a decreased allowable annual cut

The Interior Lumber Manufacturers' Association, although pleased with the overall report, suggest it was inconsistent because it speculated on the potential for future forestry activities to create jobs, but failed to speculate on the increased wood volume those same activities would create. The association raises these additional points:

- current higher stumpage rates should be added to projected government revenue impacts
- lost federal government revenue (e.g., income tax) should be included in assessing impacts
- impacts from the loss of non-cash employee benefits (such as insurance plans) are not adequately reflected

The Interior Lumber Manufacturers' Association suggests that stand-tending and value-added employment is dependent on additional investment and that this additional investment cannot be assumed to result from reductions in timber supply. The Association emphasizes that growth in non-forestry sectors can never compensate for lost forestry jobs.

One submission concurs with a number of points raised by the Shuswap Environmental Action Society and adds that the forest sector does not generate a large net profit for the government. The submission also maintains that the overall benefits received by the government do not justify the environmental and social costs caused by the forest industry.

The Ministry of Environment, Lands and Parks suggests it is reasonable to assume that the forest sector has a decreasing role in the economic stability of the timber supply area; supporting an unsustainable employment level in the short term is likely to generate unwelcome economic disruption in the future.

Other public input

- **Employment and community impacts**
  Overall, the submissions concur that the forest industry is a major and integral part of the economy and communities in the Okanagan Timber Supply Area and throughout the province. Thus any change in timber supply can have significant social and economic consequences.

  This is particularly true in some of the smaller communities where the forest sector is the dominant employer. As well as providing jobs for employees and contractors, the industry supports other local businesses.

  One respondent states that destination resorts were not consulted on the impacts of harvesting scenarios

Roughly one-half of the 239 responses relating to social and economic factors suggest reductions in timber supply may affect the following:

- **health and stability of local economies**
  Some respondents suggest economic and community factors should be given a priority equal to other values when determining the allowable annual cut.

  A few respondents report that they are resigned to the fact that resource-based communities are bound for economic decline.

- **provincial economy**
  Some respondents are concerned that revenue loss resulting from timber supply reductions will reduce funding for provincial social programs. Others observe that demand for these social programs would increase concurrently.

  One submission suggests revenue lost due to reductions in the timber harvesting land base could be recovered by increasing licence fees and/or charging user fees.

- **employment**
  It is frequently recommended that no job loss should result from timber supply adjustments.

  Several respondents note that university students depend on summer employment in the forest sector to fund their education.

- **quality of life and standard of living**
  Some respondents suggest job losses associated with reductions in the allowable annual cut would substantially reduce the quality of life and standard of living.

- **families**
  Quite a few respondents propose that the allowable annual cut be maintained to help support families who depend on it. Others note the negative effect an allowable annual cut reduction would have on families.

Eight submissions comment on diversification, suggesting that economic diversity should be viewed as an enhancement to, not a replacement for, primary industry. One respondent states that more benefit from the forest should be the goal, rather than a transfer or reduction of jobs.

Other submissions indicate that the economic objective should be to evolve the most efficient and diverse timber processing industry possible. Other submissions support the government's efforts to stimulate value-added manufacturing because it will create additional jobs in the forest industry.

Two other suggestions are made:

- create jobs by placing people who are on unemployment or welfare into programs where they can work in the forests
- create a regulation to ensure that Protected Areas revert to the timber harvesting land base if revenue or public recreation use falls below a given volume

- **Visual quality, tourism and recreation**
  Visual quality and recreation are mentioned in 22 submissions. A few respondents feel the "visible signs of harvesting activity in the timber supply area are minimal and not objectionable". Several others indicate visual quality and scenic corridors must be maintained and expanded. Several people promote the use of forested edges between highways and logged areas.

  Respondents note the value of forestry roads for accessing fishing, hunting and camping.

  Twenty-one submissions comment on tourism values:

  - tourism is very important in this area; visual quality is a necessity for the tourism industry and visual quality must be maintained and expanded
  - community economies cannot rely solely on tourism; the forest industry should take precedence over tourism because tourism is a seasonal industry and does not pay as well as forestry or generate as much revenue. Utilizing harvestable timber should take precedence over managing aesthetic values for tourists.

The International Woodworkers Association-Canada suggest that the solution to the question of how to manage visual quality is twofold:

- apply forest landscape principles
- educate residents and visitors so they expect to see the impression of the forest industry on the landscape

A few submissions suggest too much emphasis is placed on maintaining visual quality. A forest licensee states that the visual quality objectives in the *Okanagan Timber Harvesting Guidelines* are onerous and have never been ratified by the public.

Another suggests landscape mapping should be reviewed and that scenic corridors other than those along highways should be developed. Several submissions suggest that the concerns of destination resorts owners and houseboaters are similar with regards to aesthetic values.

- **Future environmental quality**
  Thirteen submissions express concern about the future of forests and the environment, stating the Timber Supply Review places too much emphasis on the potential loss of forestry jobs rather than on the opportunities presented by other forest values.

  One respondent states that the Forest Service's is focused on maintaining current economic levels in the short term, and thereby puts long-term biodiversity, watersheds, tourism, recreation and wildlife protection values at risk. These values should have a higher priority than timber production, according to this respondent.

  Another submission notes that the increasing population will escalate demands on forests and that an holistic approach to balancing demands will be required.

- **Biodiversity and older forests**
  The Shuswap Environmental Action Society suggests the more restrictive biodiversity and old growth targets in the draft Forest Practices Code should have been incorporated into the Forest Service analysis.

  The Shuswap Okanagan Forest Association suggests old growth protection will be addressed by the Protected Areas Strategy. The association also suggest current harvesting practices in the Okanagan Timber Supply Area are meeting stand level biodiversity objectives with no impact on harvest levels.

  One submission indicates that the five per cent old growth objective in the various management zones is too small.

- **Water and wildlife**
  Nine comments are made about the importance of protecting wildlife, water and watersheds. Some submissions emphasize the importance of protecting watersheds in the Okanagan-Similkameen valleys in order to maintain fully functioning forests.

  One submission suggests logging should be restricted to 700 feet from any waterway to ensure protection of riparian areas.

Discussion Paper

Two major topics covered in the *Discussion Paper* prompted public input: current forest management practices and allowable annual cut adjustment.

Current practices
A total of 120 comments were submitted regarding silviculture and current harvesting practices.

- **Clearcutting**
  Nine submissions express concern about the effect of clearcutting on:

  - **the environment**
    Some suggest reducing the size of the clearcuts to prevent blowdown and to promote water retention. Some suggest abolishing clearcuts or limiting their size to achieve true sustainable forestry. One submission describes clearcuts as a ecologically positive measure. Another suggests that fire can be used to restore a natural balance instead of clearcutting. Clearcutting should not be allowed in riparian areas, according to one respondent.

- **the safety of loggers**
  Concern is expressed that replacing clearcutting with partial cutting will increase forest worker injuries. The safest harvesting method possible is favoured.

- **employment**
  Some respondents favour partial cutting, new forestry practices and horse-logging for their potential to provide more employment than current practices.

- **current harvest level**
  The Shuswap Environmental Action Society questions whether the current harvest level is sustainable and suggests logging companies are already having difficulty finding areas to harvest. However, the Shuswap Okanagan Forest Association maintains that a flexible approach to harvesting systems and cutblock layout will permit continued harvesting.

- **Silviculture practices**
  Some submissions include suggestions for improving silviculture practices and thus productivity. Increasing silviculture activities and monitoring future tree growth is favoured as a means to maintain present harvest levels.

  Several respondents suggest enforcement of silviculture rules is poor and that replanting methods used by forest companies are inadequate.

  Other submissions indicate the need for improved management and rehabilitation of young forests to ensure improved tree growth. Some believe these silviculture practices are already taking place.

  Some submissions indicate that the land available for silviculture is decreasing due to restrictions and that regeneration problems may pose a threat to the timber supply.

  A few respondents suggest re-training loggers to do silviculture work will only displace existing silviculture workers.

  Twelve comments are made on ways to improve silviculture and productivity. These include:

  - cut one tree, plant one tree
  - use biological not chemical pest control
  - manage forests for quality products such as sawlogs rather than fibre
  - maintain diversity when reforesting
  - plant old logging roads with native species

- **insects and disease**
  Control of insects and their detrimental effect on timber supply is commonly mentioned in the submissions. The largest criticism of current harvesting practices concerns the under-utilization of insect attacked mature trees. A number of respondents suggest that unless the current mature, affected trees are cut, not only will they be more susceptible to fire, but more waste will result. Concern is also raised about the lower economic value of insect damaged trees.

  Other respondents question the logic of harvesting to prevent pest attacks; they suggest forests should be vital enough to resist pests and disease. A focus on maintaining forest health, rather than on harvesting overmature and infested trees is preferred.

- **salvage logging**
  Ten respondents comment on the amount of potentially salvageable wood left at logging sites, and provide suggestions for preventing waste, including:

  - designate an inspector responsible for ensuring no excessive waste of usable wood occurs
  - give priority to salvage logging
  - develop a better salvage program, including a licence with little bureaucracy that puts the onus on the licensee to do salvage logging
  - encourage helicopter salvage logging to recover trees which cannot be retrieved by other means
  - prohibit burning of salvageable wood

  Six respondents indicate that timber should be harvested before it becomes unsalvageable and that a reduction in the allowable annual cut may prevent this.

- **Problem forest types**
  Problem forest types (including forests with poor quality or low volumes that cannot be economically harvested with current methods) were not included in the timber harvesting land base in either the Forest Service or Shuswap Okanagan Forest Association timber supply analyses. The deduction of problem forest types reduced the land base by twelve per cent.

  The International Woodworkers Association suggests that the forest industry be given the opportunity and incentive to harvest timber that has not typically been used in the past through the use of innovative measures.

- **Soil and water**
  Eight submissions express concern about the effects of harvesting practices on the health of forest ecosystems, particularly watersheds and soil productivity. Water quality is a high priority according to several respondents.

- **Allowable annual cut adjustment**
  Only one per cent of the 983 submissions do not comment on the level of the allowable annual cut. Suggestions are offered regarding whether and how the cut should be adjusted. This input was analyzed by identifying each respondent's main reason for choosing whether the cut should be maintained, increased or reduced.

  Allowable annual cut maintenance

  Eighty-seven per cent of the submissions (including the Shuswap Okanagan Forest Association and the Interior Lumber Manufacturers' Association) say the allowable annual cut should be maintained, for the following main reasons:

  - **importance of forest industry to communities**
    The predominant concern is the potential effect of a reduction in the allowable annual cut on the economies and standard of living of Okanagan Timber Supply Area communities. A total of 393 respondents suggest that:

    - the economic health and stability of area communities are dependent on the forest industry
    - no job loss should occur
    - families depend on the forest industry
    - well-paid jobs such as those in forest industry are hard to find
    - the unemployment rate would increase and social programs would suffer if the allowable annual cut was reduced

  - **ease transition**
    To lessen the economic impact and give communities time to implement transition strategies in response to reduced harvest levels

  - **analyses indicate the present allowable annual cut can be maintained for 20 years**
    Based on the Forest Service analysis and other studies conducted, 146 respondents state there is no need to reduce the allowable annual cut immediately.

  - **confidence in current management and utilization practices**
    Based on personal observation and opinion, 68 respondents express confidence in current management practices and the sustainability of the timber supply.

  - **further review is needed**
    Thirty respondents acknowledge the difficulty of evaluating timber supply when other government initiatives are underway. They suggest the impacts of regional land use plans, the Forest Practices Code, the Protected Areas Strategy, the Forest Renewal Plan and visual quality objectives to be thoroughly assessed before adjusting the allowable annual cut. A review of specific items such as growth rates, managed stand data, timber volumes and social impacts is recommended.

  - **insects and disease**
    If the allowable annual cut is reduced, extensive areas of mature or over-mature timber would be more susceptible to insects, disease and fire, according to 36 submissions; these

forests should be harvested while they are sound.

- **improved silviculture and forest management**
  Due to new and improved silviculture methods and forest management and initiatives under the Forest Renewal Plan, 26 respondents believe wood supply will either be maintained or will increase in the future. Therefore, they indicate there is no need to reduce the allowable annual cut and that it may be possible to increase it in years to come.

Allowable annual cut increase

Eight per cent of respondents support an increase, offering the following reasons:

- it is important to retain well-paid forestry jobs and keep the unemployment level down in order to maintain a healthy economy, particularly in the smaller Okanagan communities
- elevating the harvest level to salvage forests attacked by mountain pine beetle will reduce the mountain pine beetle problem and remove other insect-infested trees
- improved silviculture will help maintain the present level of harvest and perhaps increased levels of harvest

Allowable annual cut reduction

Four per cent of the submissions (including the Ministry of Environment, Lands and Parks and the Shuswap Environmental Action Society) call for an immediate allowable annual cut reduction for the following reasons:

- future forests depend on sustainable resource management and the protection of forests, biological diversity, water quality and aesthetics. These long-term values should take precedence over short-term economics, employment concerns and the commodity approach to forests
- the Forest Service timber supply analyses are vague, outdated and based on incorrect assumptions regarding forestry jobs, sustainability of forests, protection of biodiversity and harvesting methods. The assumption in these analyses that clearcutting will continue as the primary harvesting method is questioned
- the forest industry needs to diversify and be innovative regarding labour-intensive harvesting practices, silviculture and value-added products. A lower allowable annual cut would provide an incentive for this innovation

Other concerns regarding allowable annual cut adjustment

- Several submissions suggest more timber should be made available to companies or individuals who employ more people per unit of wood harvested. Another suggests the allowable annual cut for high output/low employment mills should be reduced and made available to manufacturers of value-added products.
- Several respondents suggest the salvage of diseased trees be included as part of the allowable annual cut.
- One forest licensee suggests a partitioned cut to include the utilization of decadent hemlock and unallocated deciduous species, currently considered problem forest types.
- A respondent promotes the consideration of he impact of global warming when determining the allowable annual cut.

Related processes and concerns

Comments on other ongoing government processes in the Okanagan Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Protected Areas Strategy**
  Respondents comments vary regarding the best way to incorporate the impact of the Protected Areas Strategy. Some suggest the Protected Areas Strategy should be reviewed and included in the Forest Service analysis immediately; others note that in five years a more realistic assessment of its impact can be made.

  Some submissions express a concern that there are not enough protected areas in the timber supply area and, in particular, the headwaters of the Seymour River should be

developed into a provincial park. It is suggested that the Central Okanagan Regional Board's policies should be factored into the Protected Areas Strategy study areas and that all Protected Areas Strategy proposals should be factored into the allowable annual cut decision (including Upper Shorts Creek area, McDougall Rim, Greystokes and Upper Little White area).

Several respondents believe the Protected Areas Strategy is too restrictive and that too many restrictions have been made without a proper impact assessment. A cost/benefit analysis is needed before any further reduction in the land base or the allowable annual cut occurs.

- **Forest Renewal Plan**
  Seventeen respondents provide the following comments on the Forest Renewal Plan:
  - implementation of the plan will encourage healthier forests and shorter rotations
  - the plan will assist in replacing jobs lost to reductions in harvest levels
  - the plan will not produce jobs for laid-off workers, instead it will produce another level of government and more bureaucrats
  - existing silviculture workers will be displaced by newly trained silviculture workers
  - keep harvesting at present level to keep people working and put more revenue into the Forest Renewal fund
  - in keeping with the plan, small operators should be permitted to salvage waste wood left by the major licensees
  - increase Forest Renewal Plan funding 50 to 65 per cent for intensive silviculture
  - effort is required in reforestation and up-keep of new forests
- **Forest Practices Code**
  Seven respondents comment on the Forest Practices Code. Some want to see the scope of the Forest Practices Code expanded. Others want to see a final draft of the Forest Practices Code to determine its objectives. A few comment that the Code along with the Commission on Resources and Environment restrict opportunities for earning a living in the forest industry.

  One respondent maintains that the Code and other guidelines do not compensate for the environmental degradation which will result if harvesting is continued at the current rate.

  Some submissions state a preference for enactment of the Code and completion of a land use planning process for the Shuswap Okanagan before any changes are made to the allowable annual cut. Others suggest the Forest Practices Code should have been included in the Timber Supply Review and are concerned that waiting five years until the next determination will result in the loss or degradation of important natural areas and wildlife habitats.
- **Timber Supply Review process**
  Several comments are made on the Timber Supply Review process:
  - more time is needed for review and further studies
  - the chief forester should release a proposed allowable annual cut determination, along with a rationale report, for public comment prior to the final determination
  - hold open houses in more locations (e.g., in Penticton as well as Kelowna). Contact key respondents and groups that have continually shown interest in the process

- **Other comments**
  Comments are made on a wide range of other topics:
  - need to assess the impact of technology on the future requirements for wood products
  - need further studies on the mid-years of tree growth (20 to 60 years)
  - land claims need to be considered
  - industry should be open to input from the public about alternative uses for harvested timber
  - prohibit the export of raw logs
  - continue the operation of a log market
  - continue the use of intensive silviculture practices

Appendix 1

Meetings with Organizations	Date
Salmon Arm Environmental Management Committee	January 21, 1993
North Shuswap Community Members	January 27, 1993
Salmon Arm Forest Liaison Committee	March 23, 1993
District of Sicamous Council	April 5, 1993
North Okanagan Regional District	April 19, 1993
District of Salmon Arm Council	May 17, 1993
Columbia Shuswap Regional District	May 20, 1993
City of Vernon Council	June 7, 1993
Salmon Arm District Steering Committee	June 10,1993
Municipality of Spallumcheen Council	June 14,1993
City of Armstrong Council	June 21,1993
Salmon Arm Forest Liaison Committee	June 24, 1993
Armstrong Rotary Club	July 13, 1993
Salmon Arm District Steering Committee	October 28, 1993
Salmon Arm Rotary Club	November 8, 1993
Columbia Shuswap Regional District	December 7, 1993
North Okanagan Regional District	December 8, 1993
Okanagan Forestry Communities Coalition	December 16, 1993
District of Salmon Arm Council	December 20, 1993
Riverside Forest Products (Lumby, Armstrong)	January 6, 1994
North Okanagan Regional District Forestry Advisory Committee	January 7 , 1994
City of Vernon Council	January 10, 1994
City of Enderby Council	January 17, 1994
North Okanagan Regional District Forestry Advisory Committee	January 17, 1994
Vernon Rotary Club	January 19, 1994
City of Armstrong and Municipality of Spallumcheen Councils	January 20, 1994
Salmon Arm Major Forest Licensees and Department of Fisheries and Oceans	January 20, 1994
Sorrento Chamber of Commerce	January 26, 1994
Salmon Arm Community Members	February 2, 1994
Environmental Coalition	March 15, 1994
Shuswap Okanagan Forest Association	March 16, 1994
Okanagan Forestry Communities Coalition	March 16, 1994
City of Vernon Council	April 21, 1994
City of Kelowna Council	July 20, 1994
North Okanagan Regional District	January 25, 1995
Open Houses	
Salmon Arm (140 people)	November 15, 1994
Vernon (75 people)	November 16, 1994
Kelowna (130 people)	November 22, 1994

Appendix 2

Written submissions received by the Salmon Arm, Vernon and Penticton Forest Districts, the Kamloops Forest Region and the chief forester's office

Industry
Shuswap Okanagan Forest Association (SOFA)
Interior Lumber Manufacturers' Association (ILMA)
IWA-CANADA
IWA, Malakwa

Bell Pole Co. Ltd.
Evans Forest Products Limited
Federated Co-operatives Limited
Gorman Bros. Lumber Ltd.
Riverside Forest Products Limited
Tolko Industries Ltd., Lavington Division

Black Diamond Forest Products
Brycemar Enterprises Ltd.
DCT Chambers Trucking Ltd.
The Inland Group - Inland Kenworth
Finning Ltd.
Newnes Machine Ltd.
Price and Markle Equipment Ltd.
Woodland Parts (Vernon) Ltd.
Bloom and Siglet (Division of IRL Truck Centre Ltd.)

Local government
Columbia Shuswap Regional District
Regional District of Central Okanagan
Regional District of North Okanagan
The Corporation of the Township of Spallumcheen
The Corporation of the City of Enderby
The Corporation of the District of Peachland
The Corporation of the Village of Lumby
District of Salmon Arm
District of Sicamous
City of Kelowna
City of Armstrong

Interest Groups
Share the Central Okanagan Society
Shuswap Environmental Action Society
Similkameen Naturalist Club
Okanagan Similkameen Parks Society
Canadian Women in Timber
North Okanagan Naturalists' Club
Westbank and District Chamber of Commerce
Enderby and District Chamber of Commerce
Salmon Arm and District Chamber of Commerce
Lumby and District Chamber of Commerce
Kelowna Chamber of Commerce

Individuals
983