

Soo Timber Supply Area Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Squamish Forest District
42000 Loggers Lane
Squamish, B.C.
V0N 3G0

This is a summary of the public input that has been received regarding the Timber Supply Review in the Soo 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.

Soo Timber Supply Area

Background

As part of the review of timber supply in the Soo Timber Supply Area, the British Columbia Forest Service distributed a *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 Soo 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 Privacy Act*) can be reviewed at the Squamish Forest District office.

Public Review Process and Response

Assessment of the timber supply in the Soo Timber Supply Area has been underway since 1992. During this time, a great deal of interest has been expressed by media, local governments, forest companies, groups and individuals.

Squamish District Staff actively solicited public input on the Timber Supply Review in the Soo Timber Supply Area through the following actions:

- the *Discussion Paper* was made available at Ministry of Forests offices in Squamish, Pemberton, Nanaimo and Victoria

Soo Timber Supply Area

- newspaper advertisements and mailouts invited people to open houses
- offers to provide presentations were extended
- three open houses were advertised in the newspaper and through direct mail outs
- two information sessions were held; one with representatives from timber licensees, communities and Native bands and the other with the Soo Coalition for Sustainable Forests

As Table 1 shows, over 220 individuals attended Soo Timber Supply Review information activities. The Squamish Forest District received four completed response forms and 15 written submissions (see Appendix 1). The Soo Licensee Group, which includes the major timber companies operating in the Soo Timber Supply Area, commissioned a consultant to review the *Timber Supply Analysis*, their review is referred to as the 'technical critique' in this report.

Overall, those who attended these public information activities indicate they were informative and useful, but the participants were disappointed by the apparent lack of public interest in this Timber Supply Review.

Activities (No. of participants)	Date
Meetings with interest groups	
Soo Timber Supply Area Steering Committee (50)	December 14, 1994
Soo Coalition for Sustainable Forests (65)	March 4, 1995
Open Houses	
Squamish (51)	January 27, 1995
Pemberton (17)	January 25, 1995
Whistler (37)	January 26, 1995

Table 1: *Participation in public information activities*

Soo Timber Supply Area

Public Input

Review comments for the Soo Timber Supply Area are summarized under the following headings:

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

A final section presents public input on other ongoing government processes that may influence future timber supply in the Soo Timber Supply Area.

Timber Supply Analysis

Technical critique

The technical critique confirmed the Timber Supply Review analysis results, but generated new timber supply forecasts by examining the following issues:

- the size of the area attributable to problem forest types impacts both short- and long-term timber supply
- the short-term harvest level is very sensitive to the minimum harvestable age used
- old-growth site productivity estimation impacts the medium- and long-term timber supply levels

The technical critique suggests that while an initial harvest reduction is necessary to provide acceptable future timber supply patterns, this reduction can be limited to five per cent, permitting an initial harvest level of 551,000 cubic metres for the next 10 years. The harvest would then decline to 476,000 cubic metres over the next two decades before increasing to a long-term timber supply level of

481,000 cubic metres in 60 years. This represents an increase of nine per cent in the long-term timber supply level compared to the Forest Service analysis. The reasons for this increase are:

- the timber harvesting land base increased when different criteria were used to define problem forest types
- increases in future forest volumes resulted from an old-growth site productivity adjustment which reduced minimum harvestable ages
- increased long-term volume expectations for cedar, hemlock and spruce

The technical critique suggests maintenance of timber supply levels identified in this analysis over the first eight decades is dependent upon the availability in decade eight of stands which are being grown now. If these forests are not suitable for harvesting 80 years from now, there will be a significant shortage of wood. This sensitivity arises from the current age class distribution of forests in the Soo Timber Supply Area and is indicated in both the technical critique and the Forest Service analysis.

With the exception of suggested changes in the timber productivity estimates for regenerated forests and of the criteria to determine problem forest types, recommendations were not provided to improve the data, assumptions or computer model used in the Forest Service analysis.

Other Public Input

Soo Timber Supply Area

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

One submission indicates the size of the productive forest land base used in the Forest Service analysis is realistic.

Another respondent suggests the Forest Service analysis estimates of area reductions for unclassified roads, trails and landings is too low. Furthermore, experience in the Lillooet River drainage indicates an additional loss of 3,300 hectares of timber harvesting land base might be possible. A submission by a forest company indicates the reduction for roads in the Forest Service analysis was too high as trees can be reestablished on a portion of the growing space along roads. This comment was accompanied by a computer simulation conducted by the Ministry of Forests' Research Branch which shows the long-term impact is about one half of the road width impact.

An industry submission suggests the economic situation has changed since the timber harvesting land base was mapped in 1991. This respondent reviewed the mapping and found it was conservative, although it was not possible to do a detailed check on all mapsheets. Operability on some mapsheets was considered optimistic. A list of mapsheets with comments regarding operability was also submitted to the Squamish Forest District. The submission concludes that the timber harvesting land base might be underestimated by about 10 per

cent due to potential increases in the amount of helicopter logging, some increases in conventional logging and because some second growth forests may now be considered operable.

Another industry submission makes a similar point, stating strong timber prices and innovative harvesting techniques allow economical harvesting of lower quality and less accessible timber, effectively increasing the size of the timber harvesting land base. They suggest an allowance be considered for additional harvesting areas not currently included in the timber harvesting land base.

Several other industry submissions favour the land base used in the technical critique. One submission notes that some areas in current logging plans were not included in the Forest Service analysis timber harvesting land base due to tree height criteria, and suggest these older hemlock and balsam forests are easily reforested and contain enough merchantable timber to make them economic for logging. They also point out that some previously logged areas were not included in the Forest Service analysis.

Another submission suggests replacing economic criteria with a silvicultural criterion (such as site productivity) to determine whether high elevation and low productivity sites are included in the timber harvesting land base. This approach addresses concerns

Soo Timber Supply Area

about regeneration and rate of forest growth.

Others suggest community watersheds be excluded from the timber harvesting land base, unless their inclusion is requested by the community of water users.

One industry submission states that upcoming biodiversity and riparian management guidelines will further erode the operable timber supply. It is suggested the government assess the impact of these policies and be prepared to make adjustments where the benefits do not justify adverse social and economic impacts.

- **Forest volume estimates**

Industry submissions reaffirm the uncertainty of future forest volumes and the potential impact of this uncertainty on timber supply analysis.

One respondent is optimistic about the long-term potential of the Soo Timber Supply Area to support a higher timber supply level than shown in the Forest Service analysis.

Concern was expressed regarding possible impacts on timber supply if volumes harvested from remaining mature forests are actually lower than estimated due to a higher than average incidence of decay.

Another submission points out that the trend of declining harvested volume per hectare is not recognized in the Soo Timber

Supply Area plan and this will compound the effects of a shrinking land base on the allowable annual cut.

- **Incremental silviculture**

One submission questioned the validity of the management regimes for second growth fir used in the Forest Service analysis, especially the multiple applications of fertilizer on some sites. The respondent states this adds uncertainty to forest volume predictions.

Soo Timber Supply Area

- **Forest cover requirements**

One respondent questions the analytical techniques used to model cutblock adjacency requirements and suggests they do not constrain timber supply enough. Furthermore, adjacency is the largest constraining factor in determining the allowable annual cut and will have an impact on both the short- and long-term harvest levels. These comments were based on an interpretation of Dr. John Nelson's (University of British Columbia) work on modeling adjacency constraints.

It is suggested that due to past practices of concentrating cut in small areas, cutblock adjacency requirements are inadequate and need revision.

Another submission suggests cut block adjacency requirements will have a much larger impact on the harvest level than indicated in the Forest Service analysis.

The industry submission calls for a re-examination of visual quality objectives and other constraints to ensure they accomplish the desired objectives and that their use is justified despite the cost of lost timber production.

- **Minimum harvestable ages**

Two industry submissions suggest minimum harvest ages based on timber product objectives as modelled in the Forest Service analysis should be reconsidered. They question the extent to which today's harvest should be constrained by unpredictable

future needs. Alternatively, it was suggested that minimum harvest ages could be selected to complement timber production by eliminating age class gaps or by determining the culmination of mean annual increment. Increased research to develop more realistic culmination projections is recommended.

Socio-Economic Analysis

- **Employment and community impacts**

Submissions from labour, industry and individuals indicate concern about potential job losses from allowable annual cut reductions and the resulting impacts on families and communities. They also express concern about the ability of the logging industry to adjust to numerous concurrent forest management changes.

Another submission suggests the current rate of harvest jeopardizes the economies of communities dependent on logging because it is unsustainable in the long term. This submission suggests people must accept changing job requirements.

An industry submission supports the consideration of the impacts on communities outside the Soo Timber Supply Area which rely on wood harvested within the timber supply area.

One submission indicates some of the statistics used in the *Socio-Economic Analysis* may not be correct or are incomplete:

- the *Socio-Economic Analysis* states that by the year 2001

Soo Timber Supply Area

the population of Pemberton will be 1,000, although it is currently already over 1,000

- Daken Mill data is not included
- it was stated that Woodfibre did not use fibre from the Soo Timber Supply Area although they bought 40,000 units of fibre from the timber supply area in 1993
- the sawmill is quoted as employing 175 people, although there are between 210 and 230 people on their payroll
- The *Socio-Economic Analysis* mentions only three businesses in Squamish and none in Pemberton

An industry submission suggests the linear relationship between job loss and declines in harvest rates used in the *Socio-Economic Analysis* is not likely to predict actual outcomes. A more realistic approach is to estimate threshold effects and the corresponding consolidation that will inevitably take place.

One submission states that the impacts of the 1992 allowable annual cut reduction of 18 per cent has yet to be felt and that the *Socio-Economic Analysis* does not indicate what the associated job losses will be, or how the effects will accumulate in the event of future reductions. It is suggested the *Socio-Economic Analysis* underestimates the impact of job loss to the community. Also, the *Socio-Economic Analysis* suggests, with unsupported claims, tourism and

value-added manufacturing could replace lost forestry jobs.

An industry submission also draws attention to the potential for cumulative reductions in the coastal timber supply areas to nearby coastal sawmills. While the submission acknowledges that analyzing this cumulative effect is beyond the scope of the *Socio-Economic Analysis*, it suggests consideration be given to this potential broader impact.

One person suggests offsetting additional reductions in harvest levels with a value versus volume focus guiding forest management. Furthermore, initiatives should be implemented to reach this goal.

Several submissions acknowledge the potential of the Forest Renewal Plan to offset projected job losses.

One respondent states that the Forest Renewal Plan is an unsustainable foundation for building a stable economy.

Two individuals suggest more of the timber harvested in the Soo Timber Supply Area should be processed within the area.

- **Environmental impacts**

One industry submission suggests environmental impacts of cut reductions are overestimated in the *Socio-Economic Analysis* and predictions of reduced diversity are inaccurate: "*the Soo Timber Supply Area has 18 per cent set aside as parkland and the Timber supply area will be managed for*

Soo Timber Supply Area

a variety of age classes. The report's comments in regards to the spotted owl are premature."

Another submission stresses the importance of preserving intact ecosystems to the well-being of future generations.

- **Non-timber values**

Several people suggest that tourism will continue to increase and that a relatively undisturbed natural environment is an important factor in drawing tourists.

One respondent states that the *Socio-Economic Analysis* should have considered the potential negative economic impacts on forest based tourism if the allowable annual cut is not immediately reduced.

- **Economic and social objectives**

Two people suggest economic objectives are the primary consideration and that a strong forest economy is necessary to provide social benefits. One suggests tourism cannot replace forestry jobs and income as there is worldwide competition for tourism dollars and a lack of control over the value of the Canadian dollar in world money markets.

Another submission suggests striving for an equitable move from existing harvest levels to a long-term sustainable level, recognizing that socially and economically it will take time to achieve a balance between all uses of the forest, and that we must be careful not to preclude

other present and future uses of the forest.

Discussion Paper

- **Forest management practices**

One submission suggests the recovery of damaged timber should be given a higher priority.

- **Incremental silviculture**

Industry submissions emphasize the importance of tending existing areas of young

Soo Timber Supply Area

forests to ensure their availability for future harvest, and so the highest potential harvest levels can be met now and in the future. They note the potential for incremental silviculture treatments to increase the available volume and improve log quality in the long term. As a result of these treatments, the potential mean annual increment for the managed forests will likely be greater than predicted by the current assumed site productivity.

One submission suggests planning more tree pruning.

- **Commercial thinning**

Industry submissions acknowledge that there is little commercial thinning occurring in the timber supply area, but suggest this will change over the next five years. This change is due in part to the requirement that 10 per cent of licensees' harvest in the Soo Timber Supply Area must be accomplished with alternative harvesting methods. While it is difficult to quantify the benefits of commercial thinning with the data currently available, it is suggested thinning may reduce the impact of age class imbalances and should be considered as a possibility to help offset short-term wood shortages. It is noted that analysis work in the Fraser Timber Supply Area indicates commercial thinning may create a short-term gain of five per cent.

Another submission suggests the transition from harvesting

old growth to harvesting second growth should be considered as a challenge and an opportunity; old growth harvest should continue, but thinning programs should be implemented to offset possible shortages.

One other submission suggests that commercial thinning be considered for its potential to augment the projected short-term harvest level.

- **Harvesting systems**

One submission expresses concern about the amount of area which will be harvested if partial cutting techniques are implemented to harvest part of the allowable annual cut.

- **Allowable annual cut adjustment**

One submission suggests there should be less political input into the allowable annual cut decision and more responsibility given to professionals in the Forest Service to manage forests.

One respondent notes the allowable annual cut will be reviewed every five years and that corrections can be made in the future. This respondent acknowledges this must be done so that the allowable annual cut decision prevents unnecessary social and economic upheaval.

Another respondent notes that an already difficult allowable annual cut decision is made more difficult by uncertainty about issues such as the Forest Practices Code, stream protection, visual impacts, Protected Areas Strategy,

Soo Timber Supply Area

spotted owl and the uncertainty of forest volume estimates. The respondent expects conservatism in the analysis has left room for a higher long-term timber supply so that any reductions in harvest must be balanced against current benefits received from harvesting. The submission emphasizes that there is no right answer.

Generally respondents agree a reduction to the allowable annual cut is inevitable. Several submissions support an immediate decrease to a long-run sustainable level. Some reasons are:

- allows preservation of ecosystems to support biodiversity
- allows preservation of the natural environment which supports tourism and recreational opportunities and is the way of the future
- maintaining a higher level does not provide benefits to local residents and prolongs the certain loss of jobs and possibly increases the net job loss in the long term
- that the long-term timber supply indicated in the Forest Service analysis base case may not be sustainable
- many things will offset the negative impacts: Forest Renewal Plan, reducing the pressure to cut remaining old growth forests will keep options open for the future, the *Socio-Economic Analysis* does not predict long-term job loss from a reduction in cut,

cut reductions may be a benefit (New York Times article on Oregon). It was also suggested the allowable annual cut be further reduced in the next timber supply review to the lowest estimated long-term sustainable cut (i.e. adopt a very conservative approach until uncertainty around the long-term level is minimized)

- It was emphasized in one submission that the whole timber supply area should be managed sustainably for humans, plants and animals. Specifically, this submission *"does not support a reduction in cutting near Whistler in exchange for a higher rate elsewhere."*

One submission advocates that a reduction to 200,000 cubic metres will still allow a viable forest economy if changes are made in the local forest industry, such as more selective harvesting, less clearcutting, more value added products, local processing of local timber supply, an open market for wood, encouragement of a local wood market and encouragement of company stewardship with longer licences.

Industry and others recommend a reduction of five per cent in the allowable annual cut. Reasons given include:

- the long-term reductions required to achieve sustainable forestry will be less than indicated in the present Timber Supply Review

Soo Timber Supply Area

- a need for an orderly progression towards a long-term timber supply level, allowing time for communities to make adjustments

Related processes and issues

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

- **Timber Supply Review**

Recommendations for subsequent timber supply reviews include:

- a sub-committee be established to review operability for the next timber supply review
- use of a volume cutoff instead of tree height
- improvement of inventory in the longer term
- the determination of minimum harvest ages by using product objectives be examined
- site productivity estimates be improved
- continued research into growth and yield is required; accurate projection of future volumes is critical

- **Allocation of allowable annual cut**

One submission questions the appropriateness of Forest Licences with chart areas representing less than 25 years of allowable annual cut.

- **Protected Areas Strategy and Spotted Owl Interim Conservation Strategy**

One submission from industry suggests land-use issues must be resolved quickly. Goals and objectives must be firmly established to enable planning of timber operations.

Another industry submission requests that the chief forester look at the Timber Supply Review independent of other government processes in order to establish a baseline allowable annual cut. The submission states that the forest industry is working

Soo Timber Supply Area

cooperatively with government in developing strategies for protected areas and spotted owls that will minimize allowable annual cut impacts and achieve the maximum value (economic, social and environmental) from our forests.

One respondent comments that land-use issues confuse the allowable annual cut decision and create uncertainty. Additionally, single interests do not serve the public at large in a planning process.

Some submissions included specific suggestions for the conservation of forest resources on a valley by valley basis.

- **Treaty negotiations**
Concerns regarding treaty negotiations were noted among other land-use issues requiring resolution.
- **Forest Practices Code**
A submission notes that the impacts from other processes and the Forest Practices code were not included in the analysis.

Appendix 1

Submissions received by the Soo Forest District

Local Government

Mayors of Lions Bay, Squamish, Whistler and Pemberton along with the Chair of the Squamish Lillooet Regional District

Industry

Canadian Forest Products Limited, Vancouver
International Forest Products Limited, Vancouver
Pacific Forest Products Limited, Ladysmith
Squamish Mills Limited, Squamish
Richmond Plywood Corporation Ltd., Richmond (Submission part of International Forest Products' submission)
Intensive Forest Management Ltd., Pemberton (Submission part of International Forest Products submission)

Interest groups

Soo Coalition for Sustainable Forests, Squamish
AWARE, (Association of Whistler Area Residents for the Environment)
Whistler

Individuals

Four *Discussion Paper* response forms
Nine submissions from individuals (includes two different submissions from one person)