Soo Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on 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.

Background

As part of the review of timber supply in the Soo Timber Supply Area, two opportunities were provided for public input. The first followed release of the Soo Timber Supply Area *Data Package* and *Information Report* in August 1997. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Soo Timber Supply Area (TSA). A 30-day review period, ending September 8, 1997, was provided for the public to comment on these documents.

On August 31, 1999, the British Columbia Forest Service released the 1999 Soo Timber Supply Area Analysis Report and Public Discussion Paper. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended October 29, 1999.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Soo TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Squamish Forest District office.

Public Review Process and Response

Squamish Forest District staff actively solicited public input on the Timber Supply Review in the Soo TSA through the following actions:

- direct mail-out of the *Information Report, Data Package, 1999 Analysis Report* and *Public Discussion Paper* to key organizations in the Soo TSA or adjacent TSAs.
- the *Data Package* and the *Soo Timber Supply Area Analysis Report* were available at the district office.
- a meeting regarding the Analysis Report was held with eight representatives from local government in October 1999.

The Squamish Forest District also received 11 written submissions on the *Data Package* and four submissions on the *Analysis Report* (see Appendix 1).

Public Input

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

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

Data Package

Land Base Factors

The Soo Coalition for Sustainable Forests says the five areas announced as new parks should not be considered as contributing to the timber harvesting land base. The Coalition says that, regardless of whether legislation creating the

parks has been passed or not, it is highly unlikely these areas will ever contribute to timber supply again. The Western Canada Wilderness Committee (WCWC) recommends additional areas for protection, saying more protected areas are needed to accommodate the recreation and tourism needs of humans, and the habitat needs of declining fish and wildlife populations.

International Forest Products Ltd. (Interfor) maintains that the reduction to the harvesting land base to account for areas with moderately sensitive soils is too high, citing the results of new mapping and a recent study. WCWC says further mapping and designation of environmentally sensitive areas is needed, particularly for unstable slopes.

Interfor requests that a sensitivity analysis be carried out for deciduous-leading stands (except cottonwood) to indicate the potential gains to the harvesting land base from converting deciduous to coniferous stands.

The Soo Coalition poses a variety of questions regarding the definition of the operable land base, maintaining that site index, volume per hectare and species are all critical in determining what should be included or excluded. The Coalition notes that doing a Timber Supply Review every five years permits inclusion of questionable stands in a future analysis, based on actual not predicted performance.

Interfor says the criteria used to define heli-logging operability are too narrow and should reflect past experience. The company also requests a sensitivity analysis to determine the increase in the operable land base if the threshold for defining sites of low timber growing potential is reduced from 350 m^3/ha to 300 m^3/ha. The Soo Coalition states agreement with the exclusion of problem forest types from the harvesting land base and says the emphasis should be on finding markets for this wood.

Expected Rate of Growth and Productivity
Interfor questions whether the results of the Old Growth Site Index study will be incorporated into the base case. If not, the company asks how site index for older forests was determined and requests a sensitivity analysis showing the effect of using the study results.

Minimum Harvestable Age
WCWC says the minimum harvestable age must be raised to 300 years to ensure management of the forest for wood quality, a continued supply of old-growth wood products, soil and water conservation, and fish and wildlife habitat. An individual submission questions how the minimum harvestable age (the age at which a stand's annual growth is 90 per cent of maximum annual growth) was determined. This submission asks if it is based on an analysis of short-term vs. long-term costs and benefits, and can be defended either economically or ecologically.

Regeneration and Silviculture
An individual submission notes areas where regeneration is ongoing, costly and not very successful and asks why the Squamish Forest District continues to approve harvesting in these areas. Interfor says their experience on hemlock/balsam good sites is 80 per cent planting rather than 100 per cent natural regeneration as stated in the *Data Package*, and recommends changes to reflect this.

The Soo Coalition questions whether silvicultural goals are currently being achieved, and says in the future silviculture funds may not be available as required to meet the criteria used in the analysis.

Wildlife
Interfor says the draft plan for deer winter range management is in error and requires further on-the-ground confirmation prior to being incorporated in the Timber Supply Review. The company recommends that deer winter range be modelled using the approaches in *Deer and Elk Habitats in Coast Forests of B.C.* (such as designation of retention or rotational winter range based on snow zones, and harvesting managed for spring forage needs).

Interfor says reductions applied to account for moderate goat habitat are excessive, noting that the application of forest cover constraints would be more appropriate than land base exclusions.

WCWC says further mapping and designation of wildlife management areas is needed. They say although deer management areas are identified, important valley bottom winter habitat for grizzlies, mountain goats and other species must be identified and withdrawn from the timber harvesting land base. In addition, WCWC says Spotted Owl Recovery Areas must be removed from the harvesting land base and may need to be expanded as new nesting sites are discovered.

Interfor says that based on data from the 1994 Soo TSA analysis report, two-and-a-half times the land needed to satisfy wildlife tree patches (WTPs) has already been removed from the timber harvesting land base (in riparian buffers, environmentally sensitive areas, low sites, etc.). The company says it is likely that 100 per cent of WTP requirements can be satisfied outside the harvesting land base and therefore the further three per cent reduction from the harvesting land base is unnecessary.

WCWC says the assumption that 75 per cent of WTPs can be met outside the timber harvesting land base is wishful thinking and questions whether a professional biologist has confirmed this. The committee notes that harvesting is targetted in the best valley-bottom forest which is also important winter habitat.

Biodiversity
WCWC says the application of low biodiversity emphasis due to the lack of detailed objectives is not acceptable. Until more detailed work is complete, WCWC and an individual submission say a precautionary approach should be taken and high biodiversity emphasis at the landscape level assumed for the entire TSA.

Interfor says the analysis should assume low emphasis for biodiversity with only old seral-stage retention. The company says this is consistent with the direction given for tree farm license timber supply analyses and with the Timber Supply Review in the Fraser TSA. Interfor says the premise that not all elements of biodiversity can, need to be, or will be maintained on every hectare of the timber harvesting land base should be put forth.

WCWC says old growth reserves must not be harvested. They say the justification that they will be replaced in three rotations is ridiculous, noting that old-growth dependent species cannot wait three centuries. An individual submission says all low-elevation old growth forests should be exempt from logging, especially in the Elaho River and Sims Creek watersheds.

Watersheds
WCWC says the 23 community watersheds in the Soo TSA must be withdrawn from the timber harvesting land base. The Department of Fisheries and Oceans (DFO) says the rate of harvesting must not compromise the hydraulic stability in a given watershed and that generally a maximum harvested area (ECA or equivalent clearcut area) of 20 per cent is required for fish-bearing streams in order to protect fish habitat. DFO recommends that the current ECA

requirement (a maximum 33 per cent of the watershed being less than three metres tall at any one time) be reassessed to adequately protect the hydrological regime and fisheries resources of the TSA.

Riparian Areas
WCWC says protection of riparian areas must be increased and extended to headwater streams, citing the results of reports by DFO (1986) and the Sierra Legal Defence Fund (1996). DFO notes the role of the *Fisheries Act* which may require measures beyond the Forest Practices Code if required to protect fisheries values.

Visual Quality Objectives
Interfor asks the Forest Service to consider two VQO zones, one with gentler slopes (<40 per cent) with a lower green-up height requirement and one with steeper slopes (>40 per cent) with higher height requirements. The company says the increased availability of gently sloped, generally better sites for more intensive management will enhance timber availability. Further, they question how the approved mitigation measures around visual quality and adjacency which resulted from the Protected Area Strategy will be incorporated into the analysis.

Non-Recoverable Losses
The Soo Coalition says the timber supply analysis should consider actual performance in recovery of dead and damaged timber. The coalition says stands not contributing to timber supply should be available at salvage rates and off quota.

Socio-Economic Factors
An individual submission says there is inadequate recognition of the importance of tourism for the future local economy, and that the maintenance of viewscapes and old growth is important. WCWC says the emphasis on maintaining fibre flow for community economic stability is misguided. They state that most of the wood harvested is not processed in local communities, and that tourism contributes more to overall employment and economic stability than the forest industry does. WCWC says more information is needed on the growth/decline of employment in various sectors, the cyclical nature of timber harvesting, and the amount of employment insurance paid to loggers.

Timber Supply Area Analysis Report

Land Base Factors
The Resort Municipality of Whistler expresses concern that mountain hemlock/yellow cedar high elevation forests are lumped in with western hemlock/balsam stands. The municipality says harvest projections in these stands should be very conservative until further study is done. Whistler's submission notes they have seen exceptional damage in immature stands at higher elevations this year due to the very heavy snow pack.

Intensive Forest Management Ltd. notes that new parks are not shown on the maps in the report. The company also expresses concern that the threshold volume for heli-logging is 400 m^3/ha and that stands of nearly all the leading species are considered. This submission questions the economics of logging high elevation, poor quality hemlock/balsam in the back end of nowhere, suggesting that a considerable fir and/or cedar component is needed to cover costs.

Intensive Forest Management also questions the inclusion of age class 8 & 9 and height class 3 hemlock or balsam stands in the timber harvesting land base.

Wallace Forestry expresses agreement with the limits applied in the analysis on the contribution from helicopter areas, pending a more complete review of the criteria used to

define stands suitable for this method of harvesting. Limiting the annual heli-harvest to 135 ha should be tied to a five-year maximum (675 ha), according to this submission.

The Association of Whistler Area Residents for the Environment (AWARE) notes that no consideration was given to the protection of any second-growth areas, many of which will have high values for uses other than timber extraction. As well, AWARE says no areas were considered for longer rotations, noting that other values could be enjoyed in a longer rotation harvest.

Growth and Yield
Wallace Forestry says the growth of stands following partial cutting may not achieve levels anticipated from clearcut harvesting. This submission says data on future yields in partial cut areas is not reliable at this time.

Intensive Forest Management notes that the projected volumes for existing hemlock and balsam stands seem high.

Wildlife
Intensive Forest Management Ltd. notes that goshawks are an issue not addressed by the *Analysis Report*. AWARE says protective measures for wildlife must be spread out. The association questions what species that don't live in protected areas do if wildlife trees are mainly being maintained in protected areas.

Forest Cover and Green-up Requirements
Two submissions question the universal application of cover and green-up requirements. AWARE says each block requires its own length of time and height to green up, and the depth of snow must be considered. The association notes that many areas around Whistler have not greened up in 15 to 20 years.

The Municipality of Whistler expresses that recognition of the potential impacts of the 2010 Winter Olympics should be considered in the analysis, even though the final decision will not be made until 2003.

Riparian and Visually Sensitive Areas
The Municipality of Whistler questions the use of the Mid Coast TSA as an example of designated scenic areas. The municipality states that no scenic areas are currently designated in the Sea-to-Sky corridor, with two million visitors annually, and that the analysis of scenic areas is a priority. They recommend a flexible "visually acceptable green-up" so trees show above the snowpack before adjacent logging occurs. Five metres is insufficient where snow packs can easily exceed seven metres, according to this submission.

Wallace Forestry says the reductions used in the analysis for visual values and for riparian management may not be sufficient to meet requirements.

Non-Recoverable Losses
Intensive Forest Management expresses concern that unforeseen losses are not adequately accounted for in the analysis.

Socio-Economic Impacts
The Resort Municipality of Whistler says the socio-economic analysis would be of more value if it also identified the economic impact of tourism. In recommending a study to evaluate the impact of tourism revenue, the municipality says this would provide an increased awareness of the socio-economic relationship between forestry and tourism, and the benefits of integrated management. They recognize the importance of forestry to adjacent communities.

Intensive Forest Management notes that the economic stability of communities is important, and that actual wages generated is more valuable information than person-years. The company says silviculture employment figures

seem to be extrapolated from the last ten years of high activity, but that there's no longer an endless supply of blocks to be treated. As well, the company says any use of helicopters, by shortening the working season and using imported crews, will eliminate many person-years of labour from the local workforce and put local companies at risk.

AWARE expresses the opinion that economic growth in this area is not in forestry, but in other areas such as tourism. The association says the amount of land required to keep such a few people working in forestry is not in the best interests of all other user groups, and often creates conflict. They state that there is a place for timber harvesting in the area but not at the expense of other users.

Other Comments

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

Timber Supply Review Process
Powder Mountain Resorts Ltd. disputes the right of the Ministry of Forests to pursue any land use options in the Soo TSA that might conflict with their pre-existing rights to develop the Callaghan Valley. This claim is the subject of ongoing legal action.

The Soo Coalition says the analysis should include a section indicating what the impacts of the Forest Practices Code are and will be on both short- and long-term timber supply. The coalition says finalization of landscape units and resource emphasis designations is paramount to have a meaningful timber supply analysis. They also say the public review period for the data package should be longer than 30 days due to the importance of the document.

Interfor expresses concern with double-counting due to so many overlapping constraints and requests a detailed explanation of how these will be modelled.

Forest Management Practices
WCWC says Soo TSA forests must be managed in the same manner as Clayoquot Sound (i.e., First Nations decision-making power; no clearcutting; full protection for environmental and cultural resources; expanded protected areas; and full ecological and cultural inventories of intact areas before road building or logging approvals).

One individual calls for the banning of herbicides due to harm to wildlife. Two submissions say that clearcutting, while still currently the method of choice, places too much burden on remaining forests to support all displaced users and can cause damage to soil, wildlife habitat, streams, etc. AWARE states that selective logging practices could help significantly in maintaining stand value during and after logging.

The Municipality of Whistler says greater emphasis on forest recreation, planning and staffing are warranted, noting that the Sea-to-Sky Corridor has seen unprecedented levels of growth in the tourism and recreation market since the last Timber Supply Review. They recommend a modified Community Forest approach to showcase a unique example of integrated resource management. The municipality also requests information on the effects of heli-logging on the land base, stand regrowth and residual stand health.

Harvest Levels
Many submissions comment on the appropriate level of harvesting in the Soo TSA:

- Four individual submissions express the opinion that the TSA has been overcut and harvesting must be curtailed immediately.
- An anonymous submission questions the objective of maintaining the current harvest rate in the short term and asks if this will not compromise future economic opportunities or the ability to achieve biodiversity objectives in the longer term.
- Wallace Forestry states that if the analysis indeed shows that sustained yield has been achieved for the TSA, this is significant and should be noted.
- The Soo Coalition says defining the analysis units should receive the next highest priority for future analysis, and that a conservative approach should be taken in the interim to avoid a future falldown in harvest levels.
- The Municipality of Whistler says it is pleased the AAC appears to be approaching a sustainable level but recommends a conservative AAC until landscape unit designation is completed. As well, the municipality says the projection of 22 per cent of the area for heli-logging is overly optimistic and the AAC should be reduced accordingly until this level of heli-logging is achievable.
- WCWC says the AAC must be reduced by 70 per cent to allow for adequate protection of all ecosystems and recreation and tourism potential.
- AWARE expresses support for a further reduction in order to protect other values and users of the forest.
- Wallace Forestry notes that the impacts of Northern Spotted Owl management on harvest levels have not adequately been determined. They further note that impacts of First Nations land settlements will seriously affect the TSA, and request an analysis of the impacts.

Appendix 1

Submissions received by the Squamish Forest District

Submissions received on the Data Package
Government agencies
Department of Fisheries & Oceans

Industry
International Forest Products Ltd.

Interest groups
Soo Coalition for Sustainable Forests
Western Canada Wilderness Committee
Shapiro Hankinson & Knutson (solicitors for Powder Mountain Resorts Ltd.)

General Public
Six individual submissions

Submissions received on the Timber Supply Analysis Report
Local Government
Resort Municipality of Whistler

Interest groups
Association of Whistler Area Residents for the Environment

Consultants
Intensive Forest Management Ltd.
Wallace Forestry