

Strathcona Timber Supply Area Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Campbell River Forest District
370 S. Dogwood Street
Campbell River, B.C.
V9W 6Y7

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

Strathcona Timber Supply Area

Background

As part of the review of the timber supply in the Strathcona 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 of 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 Strathcona 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 Campbell River Forest District office.

Public Review Process and Response

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

- direct mail-out of the three documents to over 100 individuals, organizations and business. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager
- 14 meetings were held with public, representatives from industry, labour, local governments and other interests groups (see Table 1)
- seven open houses were extensively advertised through direct mail-out, newspaper advertising, articles and cable television (see Table 1)

- newspaper articles were encouraged
- radio interviews were provided

As Table 1 shows, over 160 individuals attended the meetings, information sessions and open houses. The Campbell River Forest District received nine completed response forms and 19 written submissions (see Appendix 1). The Strathcona Timber Supply Area licensees commissioned Timberline Forest Inventory Consultants to technically critique the *Campbell River Timber Supply Analysis* (referred to as the Timberline critique in this report). Two other detailed critiques were received; one from the Sierra Club and one from the Coast Forest and Lumber Association.

Activities (No. of participants)	Date
Meetings with interest groups	
Forest Industry (20)	February 14, 1995
IWA/Labour (2)	February 15, 1995
Campbell River Fish and Wildlife Club (1)	February 17, 1995
Canadian Confederation of Unions (1)	February 22, 1995
First Nations (5)	February 23, 1995
Open Houses	
Gold River (23)	April 4, 1995
Tahsis (35)	April 5, 1995
Zeballos (19)	April 6, 1995
Campbell River (17)	April 7, 1995
Courtenay (9)	April 10, 1995
Kyuquot (14)	April 12, 1995
Woss (23)	April 12, 1995

Table 1: Participation in public information activities

Prior to the 90-day review period, the district staff held numerous meetings and information sessions. Many individual meetings were conducted with stakeholder groups representing labour, forest and mining companies, local government, community interests, resource agencies and environmental groups. These meetings provided much of the information which was reported in the *Socio-Economic Analysis*.

Strathcona Timber Supply Area

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Strathcona 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 Strathcona Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Timberline critique

The Timberline critique generally supports the Forest Service analysis methodology and showed similar harvest level patterns. However, there were differences in the rate of harvest level decline and in the long-term harvest level.

Accordingly, the Timberline critique reports the following differences which had a positive effect on timber supplies:

- site indexes derived from thrifty stands to forecast growth, which had the effect of increasing overall growth rates by 14 per cent
- analysis units defined by species groups and site classification to provide finer and more detailed resolution
- future road allowances based on a five per cent loss rather than the seven per cent as used in the Forest Service analysis
- timber harvesting land base was increased by 7,500 hectares from the inoperable area to reflect increased timber market values
- use of commercial thinning to redistribute harvesting with positive effects on short-term timber supplies

The following differences were identified as reducing timber supplies:

- lower initial timber supply volumes for the Loughborough timber supply block from seven million to three million cubic metres to reflect an alleged error

- distributing the harvest pattern by reducing the harvest in the Kyuquot timber supply area by 40 per cent and increasing harvest levels in the Sayward and Loughborough timber supply areas
- removal of the Nasparti and the Tashish/Kwois protected areas

As well, two suggestions were provided that could have a positive effect on timber supplies:

- reducing green-up requirements by five years to provide a more gradual decline to long-term harvest levels
- modification of visual quality objectives to mitigate short-term impacts

In assessing the factors that could reduce or increase timber supplies, the Timberline critique stated that an initial harvest level reduction of 12 per cent was evident. However, in the long term, harvest levels could be nine per cent higher compared to the Forest Service analysis.

According to the Timberline critique, the application of forest cover constraints to model integrated resource management does not have clear goals, the ability to achieve the constraint results is not shown, and the implementation of the integrated resource management guidelines is based on broad assumptions rather than specific data.

In conclusion, the Timberline critique recommends that before the next timber supply review for the Strathcona, the following data and modelling uncertainties should be resolved:

- forest inventory updated for not satisfactorily stocked areas, update visual quality data and investigate timber volumes in the Loughborough timber supply block
- obtain field data on managed stands to support projected yield volumes
- review site indexes derived from old-growth forests and from sites with different reforested species
- obtain data on the dispersion of inoperable forested areas to examine options to meet forest cover requirements
- further research on appropriate silvicultural treatments and their associated effects on timber supply

Strathcona Timber Supply Area

The analysis methods and conclusions suggested by the Timberline critique were generally supported by a number of other submissions from the timber industry.

Sierra Club critique

The Sierra Club critique states the Forest Service analysis shows a lack of attention to non-timber values. The critique submits that the netdowns in the timber supply are based on inadequate inventory information. The critique also contends that it is unacceptable that, of the productive forests, only 0.6 per cent in the Kyuquot timber supply block was removed for recreation and only 0.06 per cent in the Loughborough timber supply block was removed for wildlife.

The Sierra Club critique makes the following recommendations:

- the Forest Service must take a broader view of forests to balance competing factors including the protection of biodiversity
- harvesting guidelines must continue to limit where and how cutting occurs as well as limit the size of clearcuts
- establish the minimum size of patches of mature forest left for wildlife
- design corridors between reserved forested patches
- and retain snags and green trees to maintain structural diversity.

In conclusion, the Sierra Club contends that the Forest Service analysis failed to consider protected areas, low-intensity areas, the Forest Practices Code and the Forest Renewal Strategy.

Other Public Input

• Integrated resource management

A major concern raised by the timber industry is that integrated resource management guidelines have the biggest impact on harvest levels in the Strathcona timber supply area. They further suggested that these guidelines tended to be too restrictive with regard to such factors as green-up requirements and visual quality objectives.

Others suggest that not enough information is currently available and insufficient consideration is given to the issue of “non-timber” resources. Suggestions were made that to protect these “non-timber” resources in the area, more land has to be set aside for recreation, wildlife, fisheries and tourism opportunities.

• Wildlife

A number of submissions note the Strathcona timber supply area is home to a number of wildlife species that are currently red- or blue-listed and the Forest Service analysis does not adequately account for forest cover protection of these wildlife species.

• Insects and disease

Concern was expressed that there was no deduction in the Forest Service analysis for insects and disease. The submission states that Sitka spruce cannot be successfully regenerated over much of the Strathcona timber supply area because of spruce weevil. Also due to the amount of harvesting which has taken place over a short period of time, there are large areas of young forests with little species diversification that are very susceptible to insect attack.

Socio-Economic Analysis

• Employment and community impacts

A number of the submissions suggest that the long-term economic stability and survival of local communities is dependent on the timber industry achieving and maintaining a sustainable level of harvest.

There were also suggestions that errors and omissions in the information contained in the *Socio-Economic Analysis* put some of the report in question. There were a number of comments made that the timber industry is an important factor in the local economy contrary to some of the findings of the report. The Kyuquot Sound Multi-Use Association in particular was concerned with the *Socio-Economic Analysis* suggestions that non-timber resources were of greater importance than the timber industry. They felt that the concerns and views of local businesses were not reported and the importance of the timber industry in supporting other community initiatives was also not considered.

The Sierra Club submits that one of the assumptions in the *Socio-Economic Analysis* is that a 12 or 34 per cent reduction in harvest levels would result in a 12 or 34 per cent reduction in direct employment. The submission suggests that the *Socio-Economic Analysis* implies that the only way to reduce employment impacts was to defer reductions in the harvest level and that such conclusions ignore the rest of the employment

Strathcona Timber Supply Area

sector, the changes in future technology, silviculture practices, location of processing facilities or more value-added processing. The Sierra Club suggested increasing employment in silviculture programs, increasing wood processing employment in the area, and increasing economic diversification such as tourism by maintaining old-growth forests and scenic landscapes.

- **Environmental impacts**

A few submissions suggest that the *Socio-Economic Analysis* did not go far enough in quantifying or addressing the impact of the allowable annual cut on non-timber resources such as wildlife, recreation and visual quality and therefore was not able to quantitatively compare timber to non-timber resources.

It was also suggested that non-timber resources should be quantified in order to compare their value to that of the timber resources being harvested.

Comments were made that without a locally sustainable forest, local non-forest industries such as fishing, tourism and recreation would also be adversely affected.

- **Allowable annual cut adjustments**

Almost all of the comments received regarding the proposed reduction agreed that the immediate 12 per cent reduction in the harvest level was necessary to ensure a long-term sustainable timber supply.

The Coast Forest and Lumber Association submission recommends that the harvest level be maintained at a higher level (than indicated in the base case) for the next five years while making a concerted effort to examine the costs and benefits associated with forest management practices and the expected yields from second-growth forests. They suggest that in the meantime, further research could be carried out to provide a more accurate database for the next determination.

Submissions from the timber industry suggested that government guidelines, especially those related to visual quality objectives, played a major role in determining the harvest level. It was suggested that these guidelines should be relaxed to avoid too harsh a reduction in the allowable annual cut in the short term, and spread out declines over time to reduce negative impacts to the timber industry without affecting long-term sustainability. They

suggested for example that a change in the green-up ages by five years could increase the allowable annual cut in the first decade by four per cent.

A few submissions recommend that in the first decade the allowable annual cut should be reduced by 34 per cent to the non-declining harvest level to ensure protection of non-timber resources such as fish, wildlife, recreation and conservation values.

- **First Nations**

First Nations submit that while they support the Forest Service's initiative to reduce the harvest to sustainable level, they are concerned that their economic well-being and traditional rights are being ignored in order to save timber industry jobs.

Public Discussion Paper

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

- **Minimum harvestable age**

One respondent suggests that a rotation age increase of more than 10 years is required to maintain biodiversity and general forest health. They recommend that it may be useful to set aside 25 per cent of the Strathcona timber supply area to investigate the result of a rotation age of 200 years since even timber yield would be diminished by the gradual impoverishment of the soil habitat by too rapid of rotations.

Another respondent suggests that the minimum harvestable ages of 60 to 110 years used in the Forest Service analysis will produce a mature plantation with a high proportion of juvenile wood and a low quality wood product instead of the close-grained wood for which British Columbia is famous.

Strathcona Timber Supply Area

- **Silviculture treatment**

Several submissions suggest that activities such as commercial thinning, use of improved seed stock, tree spacing, use of fertilizer, and a quicker reforestation program could have a positive effect on second-growth harvest levels in the long term.

Related issues and processes

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

- **Vancouver Island land-use plan**

The *Discussion Paper* specifically states that the results of decisions from the Vancouver Island Land-Use Plan and from the implementation of the Forest Practices Code are not included in this timber supply review. Nevertheless, a number of submissions state that the effects of these processes, especially the land-use plan, must be considered before determining an allowable annual cut. However, input was divided about the effect on harvest levels if these were considered.

- **Timber supply review process**

It was suggested that the public must be involved at each point in the decision making process, information provided to them must be understandable, issues must be identified early, and the consequences of alternative actions must be outlined.

The Sierra Club suggested that a simpler and clearer planning process needs to be developed to avoid pitting resource users against each other. They also suggest that the public should be able to carry out their own timber supply analysis by having full access to the Forest Service analysis model.

- **Establishing separate harvest levels**

Several comments were received suggesting that the three timber supply blocks making up the Strathcona timber supply area should be reviewed separately and sustainable harvest levels should be determined in each area.

A few submissions point to the Western Strathcona Local Advisory Council report which recommended the Kyuquot Supply Block must move to a sustainable rate of harvest responsibly and expeditiously.

- **Forest renewal program**

It was recommended that funding available through the Forest Renewal BC program should be sought to aid in silviculture projects. At the same time this would generate short-term employment opportunities for the region.

A few of the submissions suggest that local communities and businesses would benefit if more funds were made available through the Forest Renewal BC Program for silviculture and value-added manufacturing projects in their area to generate economic stability.

- **Value added**

There were suggestions that more value-added processing of timber products should be encouraged and supported through incentive programs to broaden the economic base of the area.

- **Economic diversity**

It was suggested by a few of the submissions that an economic development strategy for single resource communities must be developed to diversify economies and create favourable business climates that protect the cultural, social and environmental values of the community.

Another suggestion was made that a more dynamic view of the economy and ecosystems is required to anticipate changes in the future.

Appendix 1

Submissions received by the Campbell River Forest District

Local government

Regional District of Comox-Strathcona

First Nations

Ka:'yu:'k' t 'h/Che:k:tl̓es7et 'h' Nations

Industry

Clayton Resources Ltd.

Coast Forest and Lumber Association, Vancouver

Comox Valley Shakes Ltd.

International Forest Products Ltd./Timberline Forest Industry Consultants (for the Strathcona Timber Supply Area licensees)

Interest groups

Concerned Citizens of Tahsis

Kyuquot Economic and Environmental Protection Society

Kyuquot Sound Multi-Use Association

Nootka Sound Stability Coalition, Gold River

Sierra Club of B.C.

Individuals

8 submissions

9 completed response forms

(names are not listed in accordance with the *Freedom of Information and Protection of Privacy Act*).