

**Appendix 21: Public Comments**





## Public Comments

No comments were submitted by the the public regarding SFMP# 3.

Public comments on SFMP# 2 were received from one party – Jim McKnight. His comments follow:

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Jim McKnight  
RR1 Site 1 Compartment 4  
Station Main  
Fort St John  
V1J 4M6

Re: Sustainable Forest Management Plan #2

To whom it may Concern,

The following are my personal observations about this plan and must be taken in that context. I have read the complete document as presented on the Website.

A bit of background about myself. I am 63 years old, born and raised in Fort St. John. I have lived on the Swanson Lumber road for nearly 38 years. I would like to describe myself as a realistic environmentalist. I believe that the resources are there for our use but this use must be done in a responsible and sustainable manner. I do not have any formal education in forestry or environmental issues but consider myself very well read and observant. When I moved here, it was before there was any serious level of logging. The Swanson Lumber mill at the time was only a planer mill with no kilns yet. The feed stock was from a number of small sawmills in the area. Since that time there have been 10 or 12 very hungry mills come and gone in the area.

I have watched the loss of forest cover for many years, and recognize that a lot of this loss has not been for forestry, but from oil and gas development, fires, hydro development and agriculture.

I will address the rest of my comments in a point format as I have not been able to organize my thought into a more logical form.

1. The plan as presented on the website is certainly a step in the right direction.
2. There are huge quantities of information contained.
3. **What if we have got it wrong?**
4. I regret that for a number of reasons I was not able to attend earlier meeting of the pilot group. Quite likely many of my concerns were discussed during this process.
5. The plan is an example of bullshit trying to baffle brains. There are more than 90 abbreviations used in the plan and more than a few of them are not explained. This plan should be available in a format that is easily read and understood by the lay people.
6. No where in this plan is there any discussion of the vast areas that were classed as NSR Not sufficiently restocked?
7. What about the land base that was logged before this plan was implemented?
8. In a recent publication it was stated that it was taking 7 years from the time logging was completed until planting began. I strongly feel that there should not be ANY delay in restocking and in some cases no further logging should be allowed until replanting is completed.
9. It was just announced this week that the government is going to require a tree be planted for every one taken down. I feel very strongly that this requirement should be more like 4 or 5 to one.
10. I have serious concerns that the level of inputs in all areas of silviculture are lacking. I believe that we are not paying enough attention to areas that are reforested and others that should have some form of stand tending such as juvenile spacing, fertilization, brush control carried out.
11. The mills are not utilizing the raw material in the most effective and responsible methods. The demand for production targets does not always result in the best recovery of the raw product.



12. In the plan it stated that the last inventory was more than 90 years ago. There is no way that any AAC (Annual Allowable Cut) can be accurate. With this in mind how accurate is this inventory?
13. In that the Peace River country is just an extension of the Great Plains of North America and as such is very nearly desert land what effect will Climate Change have on these inventories? If the climate continues as it seems to have done for the last number of years what effect will that have on seedling survival rates and growth rates?
14. What is the projected time from planting until trees will be available for use? I have been told a number of times that this projected to be 85 years. I feel that here a more realistic term would be 100 to 115 years.
15. The pine beetle infestation was shown the folly of using a single species for reforestation. Much more research must be done into other species, crossbreeds etc to ensure that we do not just start some other type of plague. As has been pretty evident over the last couple of years Mother Nature still dictates.
16. Page 93 as base line information not available?
17. Page 114 250 year plan horizon. I find this to be an exceptional long time scale, as the people now making these decisions will have been gone for more than 200 years and as such will bear no responsibility for their actions.
18. I have always been concerned about our methods of logging. The clear cut methods presently used not only take out any merchantable timber but typically destroy any new growth that maybe 15 or 20 years old and completely acclimatized for the area. If we do not damage it logging we slash burn or ripper plow everything else.
19. Page 178 This is the first of a number of waffle words that I am concerned about. If the plan does not meet the requirements the District Manager may waive the requirement to additional treatment.
20. Page 180 Assuming a very aggressive reforestation level.
21. Page 184 Waffle words unless agreed to by District Manager.
22. Page 200 I could find no mention of Maurice Creek on the south side of the Peace River at Hudson's Hope.
23. Page 320 merchantable volume/ha at 80 years.
24. Page 321 5 meter at 16 years.
25. There are too many references to allowing the forester, district manager and others to use their discretion. In situations there should be established minimums that must be met. Any variance should be to the positive side rather than the other ways. No lowering of standards.

In closing I will restate my concerns that while this plan is a substantial improvement on our past performance we are still not sustainable and as economic pressures for profit increase many of the provisions of this plan will be overridden by the politicians.

Following is the Participants' response to Jim McKnight's comments on SFMP# 2:

June 18, 2010

Jim McKnight

RR Site 1 Compartment 4

Station Main

Fort St John, BC

V1J 4M6

Dear Mr. McKnight:

**RE: Sustainable Forest Management Plan #2**

Thank you very much for your letter in response to our advertisement for public review and comment of our proposed Sustainable Forest Management Plan for the Fort St John Timber Supply Area. You have made several good points and recommendations in your letter and we will do our best to answer your questions and address your concerns. Where appropriate, we've included internet addresses for websites where you can get further information about the topics you had questions on.

You are quite correct; there is a significant amount of information contained within this plan, the large majority of it very technical in nature as is required for a legal plan of this type. The content of the plan is largely dictated by the Fort St. John Pilot Project Regulation (FSJPPR) as well as the Canadian Standards Association (CSA) Z809-02 and Z809-08 standards and must meet certain content requirements. It is regrettable that the content of this plan cannot be presented in a format that is more familiar to the lay person, however the managing participants of the Fort St. John Pilot Project (Canfor and BC Timber Sales) are more than willing to meet with concerned or interested members of the public to discuss the plan with any member of the public to facilitate an increased understanding of this plan. Additionally, as you mentioned, Public Advisory Group (PAG) meetings are held at regular intervals throughout the year that are open to members of the public so that they may gain a better understanding of the process.

You asked “What if we have got it wrong?”. While forestry is not an exact science, the Participants are trying to minimize the risk of getting “it wrong” by trying to utilize the latest relevant research and knowledge that is applicable to the Defined Forest Area (DFA) as well as by employing the concepts of adaptive management in our practices. This includes monitoring the results of our activities and making the necessary adjustments to achieve the desired outcomes.

Thank you for notifying us of the acronyms and abbreviations that were used in this plan that were not defined or explained. We will try to correct this prior to final submission of this plan to government for approval.

It is currently the responsibility of the Participants to reforest all of the stands that they harvest to an acceptable standard. This is addressed thoroughly in the Reforestation Landscape Level Strategy and the associated indicators. The Ministry of Forests and Range retains the silviculture obligation for blocks harvested prior to 1987 and it is their responsibility to ensure they are reforested to an acceptable standard. There are a large number of these pre-1987 or “backlog” blocks that are classified as Not Sufficiently Restocked (NSR). Many of these blocks are reforested to some extent, however lack the appropriate silviculture survey data to determine if further silviculture treatments such as fill planting or brushing, are required. While the Participants do not directly manage these blocks, the unknown status of these blocks is taken into consideration during the Timber Supply Review (TSR) process by the Ministry of Forests and Range when setting the Allowable Annual Cut (AAC), and by the participants when conducting analyses to set targets for, and assess conformance to the various Landscape Level Strategies and Indicators and Targets contained in the SFMP.

In most cases the Participants conduct planting activities on blocks that are scheduled for artificial regeneration (planting) with a year or two of harvest completion. It is our belief that the “seven years” to which you refer is the Regeneration Delay of seven years allowed on certain sites. The Regeneration Delay period is identified in the approved stocking standards as the maximum amount of time allowable for a block to achieve a satisfactorily restocked state. In most cases the participants plant harvested blocks within one or two years of the completion of harvest, however when natural regeneration is used to reforest a site (eg. dragging for pine regeneration) a slightly longer period is required to accurately measure stocking levels. The additional time allowable also accommodates the possibility of a plantation failure due to disease, pests or other issues.



The comments made by government can be very general at times, and may not necessarily be indicative of actual practices occurring on the ground. In blocks managed for conifer regeneration, the participants generally replant at densities anywhere from 1200 to 1600 trees per hectare, which in most cases is more than what was on the site prior to harvesting. The number of trees planted and spacing between the trees that are planted, on any given site are prescribed by Registered Forest Professionals so that the stand can grow to produce trees with desirable characteristics for forest industry when they reach maturity. Deciduous stands within the Fort St. John Timber Supply Area are usually not planted as they grow back naturally via root suckers. However if a deciduous area fails to regenerate satisfactorily, the typical approach is to plant the NSR area with spruce.

All of the participants' blocks on which they retain silviculture obligations are surveyed on a regular basis to determine stocking levels, and overall health and condition of the stands. The participants regularly engage in stand tending activities, primarily brushing treatments, to reduce competition on the crop trees until such a time as they have reached an age and height at which competition from other species will likely not impact their growth rates and chances of survival. By planting conifer at the prescribed numbers and spacing as identified above, it makes it highly unusual for treatments such as spacing or thinning to be required within the DFA, however it is possible that, due to natural regeneration of conifer on some sites, that a site will exceed the prescribed maximum number of trees per hectare, in these cases spacing or thinning treatments may be considered if the high density of trees has the potential to cause forest health issues in the stand, or so that the stand produces trees with more desirable characteristics for the forest industry at maturity. Fertilization of stands is not currently a common practice within the DFA as it is a relatively expensive treatment and the returns of conducting fertilization on the stands (increased growth rates) do not currently justify the financial investment required for the treatment. Fertilization is also generally carried out on older stands that have already achieved a "Free Growing State" if this type of treatment is conducted before that state is reached, fertilization will equally impact tree and shrub species that are competition for the target crop species and therefore potentially impede the growth of the target species. Additionally, once a stand reaches a Free Growing state, it becomes the obligation of the Ministry of Forests and Range to manage from then on to maturity. Further information on silviculture activities and obligations can be found on the Ministry of Forests and Range silviculture website at the following location: <http://www.for.gov.bc.ca/hfp/silviculture/index.htm>. It may also interest you that the government has recently set new priorities for the Forest Investment Account program (<http://www.for.gov.bc.ca/hcp/fia/>). One of the top priorities identified was mid-term timber supply for the areas severely impacted by the mountain pine beetle. To address this there will be some fertilization projects taking place, but nothing in the Fort St. John Timber Supply Area.

The existing processing facilities within the DFA currently consist of a sawmill, pulp mill, and an Oriented Strand Board (OSB) plant operated by Canfor and a remanufacturing facility operated by Cameron River Logging. The Canfor facilities operate cooperatively to put the



material to the best use. The Cameron River Logging facility uses some residual fibre (sawdust) from Canfor's sawmill as raw material in its production, in addition to pine logs for the power pole market. Additionally, Canfor has recently invested in, and constructed a co-generation plant to utilize additional residual fibre (primarily bark) from milling operations to generate heat to run the kilns. The participants however, are still constrained by the quality requirements of their customers for the end product and the current abilities of the existing facilities to utilize certain profiles of timber. At this time, economic realities do not allow for the significant capital investment required to construct new facilities, such as a plywood plant, to put certain sizes of timber to better use. Nor can the costs of hauling this material to other facilities elsewhere, or to haul waste material and logging slash to town for the purposes of electricity production be justified at this time. Also, the participants with milling facilities work with other industries such as oil and gas, mining and wind tenures, to try and utilize the merchantable timber harvested through their activities so that it is not wasted. While it is not currently feasible for the Participants to invest in new facilities, we are willing to work with other potential parties that would be willing to make such investment.

While the old inventory that was being utilized was outdated, and the quality of the data in many cases was in question, certain key aspects of stands (age, height, diameter, etc.) are projected forward annually at expected growth rates to accommodate time and tree growth. The concerns about the accuracy of the old inventory, and the potential impact to the Timber Supply Review process are why the Participants requested that the last Timber Supply Review, originally scheduled for 2008, be postponed until the new inventory was completed. The new inventory, while not exact, is well within the tolerances of acceptability of the Ministry of Forests and Range Inventory Branch, and has been confirmed through ground sampling. Further information on forest inventories and the acceptable standards for those programs can be found on the Ministry of Forests and Range Inventory and Analysis Branch website at the following location: <http://www.for.gov.bc.ca/hts/vri/standards/index.html>.

Climate change and the impacts of climate change on the forest resources are of significant concern to the participants. While an increase in temperature in this area of the province, if that were to occur, would likely result in increased growth rates in general due to a longer growing season, some sites may become unsuitable for some species, and there would also likely be a large increase in forest health factors (disease and pests) that would impact the stands within the DFA, as we are currently seeing with mountain pine beetle. At this time the Ministry of Forests and Range is doing research into the potential impact of climate change on BC's Forest Resources and the participants will work with the Ministry of Forests and Range to implement any practical results of this research into our planning and practices where feasible. [http://www.for.gov.bc.ca/hts/Future\\_Forests/](http://www.for.gov.bc.ca/hts/Future_Forests/)

The time it takes from planting a tree until it becomes merchantable varies from site to site across the DFA depending on various conditions including the species in question, and the growing conditions of





the site. When determining whether or not a stand is merchantable depends more on the diameter and height of a tree and the volume of timber in the stand than the age. However, the Participants do not generally target stands younger than 80 years to maximize fibre production potential. In general, the growth rates for the primary species that are currently targeted for harvest in the DFA tend to decline after approximately 80 years and therefore it is usually more economically advantageous to harvest the stand once it exceeds that age and plant a new, faster growing stand in its place thus maintaining maximum rates of fibre production over time. Currently in the DFA, we are still harvesting virgin stands of timber and have an overabundance of old timber which can be demonstrated in our seral stage analysis indicator. As a result, we are often harvesting stands of timber much older than 80 years of age. This however, has changed for our conifer harvest in consideration of the current mountain pine beetle epidemic, as our current strategy is to target merchantable infested, dead or susceptible pine stands for harvest regardless of age. The Timber Supply Review also models these same assumptions in the analyses to establish sustainable Allowable Annual Cut levels.

<http://www.for.gov.bc.ca/hts/tsa/tsa40/>

The participants prescribe preferred and acceptable tree species in site plans for each site that is harvested. If a block is to be planted, the seed used must meet certain standards set by government. It is the current practice of the participants to prescribe for planting, the tree species that is most suitable for the site, this is usually the primary species that was harvested off of the site. It is also common to plant intimate mixtures of pine and spruce across a site if that is deemed to be ecologically appropriate. The Tree Improvement Branch of the Ministry of Forests and Range <http://www.for.gov.bc.ca/hti/> conducts research into, and sets the standards as to what seed and genetic resources are to be used on Crown land in the province. The participants are committed to conducting their activities consistent with the standards that are set.

For the Patch Size, Seral Stage Distribution and Adjacency strategy, the participants have relied heavily on the research and guidance in Natural Disturbance Management conducted by Craig DeLong of the Ministry of Forests and Range. DeLong's work states that historically, large wildfires were the primary natural disturbance factor that occurred on the landscape. He has conducted research into the historical sizes and occurrence of these disturbances and set targets based on this research for appropriate amounts of old forest on the landbase as well as young forest (Seral Stage Distribution) and the size of the openings created by these fires (Patch Size). This research is currently considered to be the best available and most appropriate knowledge available for the DFA and has been endorsed by several government ministries including the Ministry of Forests, Ministry of Environment and the Integrated Land Management Bureau. Interior forest condition is important for certain species of wildlife that dwell deeper in the forest that may be adversely impacted by being too close to an opening such as a cutblock or road. Unfortunately there is insufficient historical information currently available



at this time to make appropriate estimates of natural levels of interior forest so the participants have not set a target for this value at this time. Until such time as information is available to set appropriate targets for interior forest condition, we are confident that our strategy of managing by creating large openings through harvest, while leaving large areas of mature intact forest will sufficiently accommodate this value.

The presence of understory in mature stands is common throughout the DFA, and where feasible the participants try to retain this existing structure through harvesting activities. Indeed the contribution that advanced regeneration can make to reforesting a site can be significant and beneficial. There can be significant logistical challenges to retaining advanced regen (understorey) but we do make the effort to identify opportunities (i.e. areas where it's feasible). It is not always possible, or wise to do so as by removing the mature forest that previously surrounded these young trees, they are invariably exposed and very susceptible to damage from wind and early fall/late spring snow. Also in some cases retaining them in may impede either harvesting or other future silviculture treatment activities. It is no longer a common practice to conduct broadcast burning as a site preparation treatment however burning of slash piles is still common. The Ministry of Forests and Range requires the participants to dispose of these piles as they are a potential fire hazard. Mechanical site preparation treatments such as mounding, dragging or ripper ploughing are common practices in areas managed for conifer, that are often conducted by the participants to prepare the site for planting and to assist in seedling survival and initialization.

Variations to the accepted standards are common throughout this plan as well as throughout legislation and often require approval by government. In your letter you referred to silviculture obligations and the ability of the Participants to ask the District Manager to be relieved of silviculture obligations. This is not unique to the Fort St. John Pilot Project and is in fact common throughout the province. While this relief is not often requested it does allow the Participants to be relieved of their obligations if they have made reasonable attempts to re-forest a stand and through no fault of their own the stocking remains below an acceptable level and it would be unreasonable to spend further amounts of money on bringing that stand to an acceptable stocking level. In this particular case a formal request with a rationale with all of the pertinent information must be made to the District Manager of the Ministry of Forests and Range who then decides whether to approve the request or not.

A very "aggressive" reforestation regime on page 180 of the plan refers to prompt planting of blocks (i.e. the season immediately after harvest), utilizing improved planting stock and possibly conducting a site preparation treatment prior to planting, to increase seedling survival and increase growth rates in the

first few years. Conducting these treatments helps us achieve the Maximum Predicted Merchantable Volume targets.

The area covered by this plan is the Fort St John Timber Supply Area, the location you mention in your letter “Maurice Creek on the south side of the Peace River at Hudsons Hope” is outside of the area of this plan.

The silviculture note on starting on page 319 and continuing on to 320 describes a computer-based model that simulates tree growth over time. The purpose of this is to estimate the volume that a mature stand of timber will achieve based on the density of trees occupying the site at a young age. In this case age 80 was used as a common age for comparison for stands with different tree densities at a young age as it is consistent with the general assumptions discussed earlier about timber supply.

Your comment about tree growth to 5 metres at 16 years appears to be a typographical error, we will investigate this further.

One of the main purposes of the Fort St. John Pilot Project was to test a “Results Based” legislative environment for forest sector and to place increased reliance on Forest Professionals. This was due, in part, to the very cumbersome and expensive (for government and industry) administration required under the Forest Practices Code of BC Act. Under the Fort St John Pilot Project regulation, and through other regulations under the Forest and Range Practices Act in the rest of the province, Registered Professional Foresters, Registered Forest Technicians, Registered Professional Biologists and many more other types of professionals are required to utilize their training and experience and exercise their professional judgement to determine what is the best course of action in a given circumstance. The SFMP and the Fort St John Pilot Project Regulation set minimum standards that are to be achieved for various values, and it is the participants’ intent to show performance beyond that required wherever possible. In some specific and rare circumstances however, it may not be feasible to achieve these targets due to site specific circumstances, or where one issue such as management of forest health factors outweighs consideration for other values.

In closing we would again like to thank you for your interest in this plan and for the comments provided. We trust that the above response addresses your concerns and comments, if not please do not hesitate to contact us for further information.



