

**Bulkley Valley
Community Resources Board
Box 985
Smithers BC V0J 2N0**

February 13, 2013

Jevan Hanchard, RPF
District Manager
B.C. Ministry of Forests, Lands and Natural Resource Operations
Skeena Stikine District
Bag 6000, 3333 Tatlow Road
Smithers BC V0J 2N0

Re: BVCRB Comments on the Bulkley TSA Timber Supply Review

Dear Jevan Hanchard:

The Bulkley Valley Community Resources Board (BVCRB) is a collection of local citizens with a range of value perspectives who guide local land-use decisions. It was first established in 1991 to complete the Bulkley Land and Resource Management Plan (LRMP), widely regarded as one of British Columbia's most successful land-use plans. Today, the Board continues to play an important role in determining the future of land use in the Bulkley Valley. For more information regarding the BVCRB, please refer to www.bvcrb.ca or contact the undersigned.

An underlying principle of forest management in the Bulkley TSA is the various land use plans and their objectives. Future levels of cut must be contingent on meeting the objectives established for wildlife habitat, visual quality, special management zones, fish sensitive areas and landscape and stand level biodiversity. The BVCRB is happy to see that these values are incorporated into the base case.

The BVCRB continues to support the accepted LRMP allocation of the 10% timber supply budget that the LRMP Multiple Accounts Analysis determined was the effect of the LRMP Management Direction. As stated within the Preamble of the 2006 LRMP Objectives set by Government; "In the future, when new objectives and/or additional resource constraints are being contemplated, the LRMP budget will be considered and the goal will be to keep cumulative impacts to less than 10% for the Bulkley TSA".

The BVCRB is interested in the ecological sustainability of local land use decisions as well as the economic sustainability of Smithers and the surrounding communities. The local West Fraser sawmill continues to be an integral part of the socioeconomic fabric of our community and it is imperative that land use decisions facilitate a continuation of its role. Section 2.1 of the LRMP indicates "Priority will be given to maintaining existing tenures when new land use decisions are contemplated pursuant to the LRMP".

We note that the base case has incorporated a reduction of 17% to the THLB in addition to seven forest management changes since 2001. The result of these changes and others in the 2012 analysis is a 6% reduction in the initial harvest followed by a further 6% in the second decade. Despite these forecasts, the BVCRB advocates maintaining the existing level of cut within the Bulkley TSA at this time and offers the following comments in support:

Productivity estimates have improved significantly (increased) since the last TSR.

The MPB losses in the discussion paper appear to have been over-estimated. We question the likelihood that the Bulkley TSA will experience the 11% loss projected in the mid-term (sensitivity analyses). We recognize this does not affect the base case, but suggest that it should not be decisive in this AAC determination.

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The VRI Phase II inventory adjustments were not included in the base case (11% upward impact in the short term and 15% upward impact in the mid term). These could more than offset the decline in the initial harvest projection and should be given consideration. The long term harvest level in the base case analysis (881,290) is 3% higher than current AAC (852,000).

It is imperative that inventories are current and statistically sound to ensure confidence in forest policy decisions. The BVCRB suggests a review of the current Bulkley forest inventory and, if necessary, an update prior to the next TSR. We also recommend a review of the operational adjustment factors (OAF) to make sure they are reflective of climatic conditions. Climate change considerations must be adequately taken into account in cut determination.

As stated above, it is important to the BVCRB that we maintain community stability. We feel that it would be preferable to wait another 5 years to consider an adjustment to the AAC. At that time, there should be better information associated with timber yields and MPB losses. The BVCRB recommends the next TSR occur in 5 years rather than waiting for 10 years.

The BVCRB supports a continuation of the partitioned cut for marginal sawlog and pulplog stands. This is an important principle that ensures the full profile of timber species and quality is harvested. To that end, the BVCRB also encourages Licensees to shift their harvesting priority from green, non-attacked pine to other tree species if the MPB infestation tails off as per the model projections.

We appreciate this opportunity for comment.

On behalf of the Board,

Jeffrey Anderson
Chair, Bulkley Valley Community Resources Board