

January 25, 2008

The Honourable Rich Coleman, MLA  
Minister of Forests and Range and  
Minister Responsible for Housing  
Government of British Columbia  
Room 128  
Parliament Buildings  
Victoria BC  
V8V 1X4

Dear Minister,

**Re: Response to the Coast Forest Action Plan**

This response is provided by the Association of BC Forest Professionals (ABCFP), a group of more than 5,300 individuals committed to the practice of professional forestry and to the stewardship of British Columbia's forests.

The ABCFP favours the direction stated in the Coast Forest Action Plan (CFAP) and offers the following comments to assist government implementation efforts. In particular, the plan to support the coastal forest industry by focusing energy and resources on incremental gains in silviculture, managed second-growth forests and improvements in the product sector. In reviewing the CFAP document, we recommend improvement on the timber inventory, clarification on shortened rotation strategies, and an increased investment in the provincial forest.

The proposed shortened forest rotations may represent a management shift and the ABCFP points to the November 2006, ABCFP "Assessment of the Status of Forest Inventories in BC" report and the recommendations that would assist the government in making the decisions specified in the Coastal Forest Action Plan. We agree that a basic level of inventory is necessary to be current in order to assess broad values such as vegetation diversity, water quality and quantity values, and habitat. And we add that a more detailed vegetation inventory at the stand level is necessary to capture the distribution of vegetation types for fertilization treatment followed by harvesting. This higher resolution of vegetation inventory will not only accurately define the treatment area, but also provide information to analyze the benefit, prioritize funding and reduce the risk associated with forest management decisions.

Management risk associated with shortened forest rotations in the CFAP is worth exploring more thoroughly. Tending second growth stands to achieve merchantability sooner (fifty years) is a classic and well understood forestry intervention. Based on the proportion of the second-growth land base slated for fertilization, we assume the treatment is to be applied over a relatively small proportion of the second-growth land base. If targeted correctly, this can be a very effective strategy.

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However, others might assume the CFAP is heralding a general shift to shorter rotations in second growth on the coast. If that is the case, the potential pitfalls of such an approach should be carefully considered. A general shift to shorter rotations would require more area to be harvested per year. As well, log sizes would shift to be uniformly smaller, meaning any desire to return to larger piece sizes in the future would require a substantial reduction in harvesting for a period of time. There is also a question of the ecological suitability of large-scale shorter rotations. Currently, variable retention has a significant presence on the coast. Recent data suggests almost one-half of the area logged is targeted at variable retention or other partial-cutting techniques. The increased shading from in-block retention may reduce growth in a way that cannot be overcome through fertilization. As well, species such as red and yellow cedar are slow-growing in second-growth stands and it is doubtful less than fifty years would be sufficient to produce valuable cedar logs on many sites on the coast.

The provincial forests have benefited from a strong silviculture program in the past. While the CFAP investment in the areas of fertilization, tree improvement and inventory is welcome news, the value of the coast forest resource suggests a much greater silvicultural investment can be made for short and longer term benefits. A diversity of intensive silviculture activities can also be explored as a beneficial means to achieving the forest goals in the CFAP.

The investment proposed in the product development and marketing sector is an important part of the CFAP. Additionally, policies and timely decisions by government that support land base certainty can have the positive effect of supplementing investment benefits. The ABCFP encourages the government to coordinate the investments with other levels of government, industry (big and small) in order to support the overall health of the forest sector.

We agree that CFAP concentration on the hardwood sector not only supports the diversity of the coastal forest industry but also the diversity of the coastal forests. We would emphasize that increased efforts in the hardwood harvest be supported by forest establishment research. Working with the hardwood forest industry and researchers can achieve tangible results in areas such as hardwood stocking standards and defining more tools to achieve healthy ecosystems.

The ABCFP encourages government to look beyond the CFAP and investigate the outcomes of the plan relative to other developing strategies such as climate change. The vision for the competitive and sustainable coastal forest must be considered in light of parallel concerns and programs.

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The ABCFP supports the cooperative approach taken by the government to have the collective wisdom of key stakeholders assisting in the development of the CFAP. Our association would welcome a request to participate in any future deliberations.

Thank you for taking the time to consider our perspective on this important issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Knowles', with a stylized, cursive script.

Paul Knowles, RPF  
President

Cc Doug Konkin, Deputy Minister