

April 11, 2006

Honourable Dave Coutts
Minister Alberta Sustainable Resource Development
MLA Livingstone Macleod
#4220 Legislature Building
10800 – 97 Avenue
Edmonton, AB
T5K 2B6

Dear Minister Coutts:

Re: C-5 Forest Management Plan

The members of CROWPAC (Crowsnest Forest Public Advisory Committee) are appreciative of having had the opportunity to provide input into the C5 Forest Management Plan 2000 - 2026. The process has been a lengthy and detailed one that required a great amount of effort for all involved. Alberta Sustainable Resource Development (SRD) staff has put in countless hours to provide information to enhance our decision making and hopefully make our advice relevant. Everyone on CROWPAC has gained a much improved understanding of the complexity of proper forest management and the multiple values of the forest. That is due to the work and support of the SRD staff and commitment of CROWPAC members.

SRD is to be commended in bringing together a diverse group in the CROWPAC so as to represent the diversity of values that the citizens of Alberta hold for our forested lands. Because of the diversity of views and values one would reasonably expect the resultant plan to be a compromise and that is the case. The FMP sets a lofty goal (page 9 C5 FMP) in managing forestry practices to supply a continuous flow of timber while ensuring the health, well being and sustainability of the forest ecosystem. It states that a wide range of cultural, educational, economic and social benefits will be achieved in conjunction with the timber harvest and that the natural environment will be protected and environmental quality will be maintained (page 10 C5 FMP). At the same time it recognizes that detailed planning to address the non-timber values are not a part of the C5 FMP. It states that some are addressed in other processes or legislation while many others have yet to be addressed. These other values are vitally important to the both the

health of the forest and the benefits that present and future Albertans will derive from the forest. It is vital that they not be lost in any future planning or execution of those plans

While the current FMP is an improvement over what had previously been in place, all members of CROWPAC very strongly recommend and wish to have placed on record, a number of points that will hopefully ensure that the values that we all worked so hard to develop are reflected and operationalized in this FMP and any future integrated system of plans and regulations through which the citizens of Alberta obtain the maximum benefits that can accrue from our forests.

- The objective with the highest priority for CROWPAC is water quality. The FMP investigates affects to water flow from timber harvest but does not include potential issues of water quality.
- Alberta Sustainable Resource Development is the manager of The C5 Forest Management Plan 2006 – 2026. It is essential that the Government of Alberta provide SRD sufficient financial and other resources to effectively monitor and adaptively manage the forest. The plan quite rightly stresses the importance of adaptive management, measurable targets, the application of a sound scientific research and a precautionary approach. Inherent in the process is the need to support further scientific research on all values of the forest and its healthy sustainability. To achieve those ends requires the careful application of adequate resources. Sound planning practice involves the detailed commitment of financial resources and manpower as part of the plan.
- Repeatedly, those knowledgeable of forest management have stressed the uniqueness of the C5 area. Given that Alberta is growing dynamically and changing, that the area is under threat from pests and climatic change, and that increased demands from all sections of our society are going to be placed on the forests of C5, it is essential that the planning be proactive and utilize the best information currently available. Members of CROWPAC have serious reservations regarding their confidence in the inputs to the TSA Model and AVI / Yield Curves, as well as comparative data with which to develop baselines. In reviewing the TSA, the amounts of timber harvested, its sequencing and the sustainability of that harvest are quite apparent. What is not clear is how the computer modelling takes into account all the other values that we developed and identified as objectives. We know that it is thought by SRD that run 90022 will in 20 years best meet the desired future forest criteria but confidence by CROWPAC and perhaps SRD in that prediction is low especially concerning the non-timber values of the forest.
- There are four scenarios covering the mountain pine beetle listed under 4.4.1 of the timber supply analysis. Scenarios 2 and 3 are listed as future possibilities. Under scenario 2, harvest volumes could exceed 500,000 m3 per year and carry with it serious ecological and environmental liabilities. There have been no calculations made as to when scenario 2 would be abandoned in favour of scenario 3. This shortfall needs to be addressed otherwise we run the risk of passing on a resource exploited for immediate gain, instead of a resource where natural capital was properly accounted for.

- Maximum cut block sizes as currently defined are a concern. Our committee believes current cut block maximums coupled with low retained structure have great potential to compromise the ecological and social values inherent in the plan.
- The plan centers on the sustainable harvest of timber while considering other values. This is clearly an economic point of view. However no one has yet been able to provide a reliable analysis of the economic benefits derived from the other ways in which we use the forest. This is an area which is quantifiable and should be addressed if we are looking at the maximizing benefit to Albertans. The forest may be able to generate equivalent revenue in more socially and ecologically friendly ways.
- Important issues such as fragmentation, connectivity and interior habitats have not been addressed in the FMP or in some form of environmental assessment, nor have the cumulative effects been considered in the planning process. We suggest they should be an important component of the forest management plan.
- The 144,000 m³ Spray Lakes carryover coupled with cutting that may be necessary in the immediate future to combat Mountain Pine Beetle could seriously compromise the other values that we hold for the forest.
- In order to garner public support for future plans it should be made clearly apparent to the public how expertise from areas such as wildlife, fisheries and water management, to name but a few, have contributed to the plan, how they are monitoring the results, how those results compare to the identified targets and how that monitoring is resulting in adaptive management. Review of the current plan and any future plan by a panel of independent experts from relevant disciplines would certainly add credence to the process.
- In fairness to all parties the operational guidelines for the plan have to be clear, attainable and enforceable. So too, they have to be enforced with sufficient consequences both positive and negative.
- Topics such as further protected areas and access management planning will likely have to be integrated in future planning.
- A portion of the increases to the AAC should go to the Community Timber Program.
- Considering the increased pressures and changes occurring on the C5 landscape the forest management plan should encompass 10 years, not 20. The proposed 10 year review should be conducted 5 years into the plan.

CROWPAC is a group chosen by SRD to provide input and represent the public's best interest, as we see it, in developing the 2006 -2026 C5 Forest Management Plan. After much discussion and deliberation the members of CROWPAC believe there are enough uncertainties regarding the FMP's ability to achieve the ecological and social priorities, as

represented in the Preferred Future Forest and Timber Supply Analysis sections, to let it be known both to SRD and the public that we cannot entirely support and defend those sections. We recognize that much careful thought and effort has gone into the entire process. However we feel compelled, in the public's best interest, to point out our concerns. To do less, we believe, could pose too great a risk to our forests and all the benefits that they provide for current and future Albertans.

We would respectfully request acknowledgement of this letter and written response to our concerns by your department. We would also request that this letter be included as an appendix in the C5 FMP as a matter of public record.

Respectfully submitted,

CROWPAC (Crowsnest Forest Public Advisory Committee)
c/o P.O. Box 818, Blairmore, AB TOK OEO

cc: B. Pickering, Deputy Minister
D. Sklar, Executive Director