



Getting Control

A forest industry review of events and actions related to the forest fires that occurred in 2003 with recommendations to for the future fire management planning and practice

A submission to the “Firestorm 2003” Commission



Council of Forest Industries

December 4, 2003





About the Council of Forest Industries

The Council of Forest Industries (COFI) is the provincial voice of the BC forest industry.

COFI companies operate over 120 production facilities in more than 60 forest dependant communities in the interior of British Columbia. These operations account for eighty percent of all BC softwood lumber shipments and roughly 30 percent of Canadian softwood lumber shipments.

Our members employ close to 50,000 people. 150,000 families in B.C. depend directly or indirectly on COFI member companies for their livelihood and well-being.

COFI members practice sound, sustainable forest management while producing about 11 billion board feet of lumber, 3.5 million metric tons of pulp and paper, 2.5 billion square feet of panels and veneer, and other value added wood products that are sold around the world. The combined value of the products our members produce is approximately \$10 billion annually.

COFI member companies and their employees contribute about \$2.4 billion annually to government revenues.

COFI's vision is, **“To positively influence the revitalization of British Columbia's forest industry as the recognized primary contributor to the economic growth and stability of the Province, now and in the future”**.



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Executive Summary

The Council of Forest Industries (COFI) appreciates the opportunity to provide this submission to the "Firestorm 2003" review. Our members operate mills and their employees live in all the Interior communities affected by the wild land fires of 2003. These impacts were felt both directly in interface areas as well as by the continuing impacts on forest management and timber supply.

We wish to recognize and indicate our sincere appreciation for the courage, effort and devotion of the men and women who were involved in the struggle to control the multiple fires that threatened lives, property and forest values in the southern interior this past summer.

We also wish to particularly acknowledge, with regret, the three pilots who lost their lives fighting these fires this past summer.

The comments and recommendations contained in this submission are designed to build on the BC wildfire management programme's strengths and to improve BC's ability to respond in the future to wild fire events similar to those experienced in 2003.

Our submission follows the chronological order of events in fire management from pre-planning to post-fire issues. The following is a summary of our recommendations:

1. All levels of government need to incorporate forest fuel management planning and operational content in statute, standards and policies in a manner that is coordinated and consistent with all other government jurisdictions over or neighbouring the effected forested landscape.
2. All levels of government must have authority to address high risk and high hazard forest fuel management issues on private land where those risks and hazards pose risks to neighbouring forested landscapes. In developing these authorities for possible intervention, the issues of costs and liabilities must be clearly and fairly addressed.
3. The Ministry of Forests (MOF) needs to review the roles and responsibilities of Fire Centre staff and processes in relationship to MOF District staff through all phases of fire management to ensure that the overall management is effective and efficient.
4. The BC government, Fire Commissioner, police, local government, the forest industry and other sector interests must collectively develop a much more robust communication process and protocol to deal with future emergency situations.
5. The MOF must have the budget necessary to develop more robust contingency plans for personnel and equipment that have the capacity to deal with the magnitudes of the fire events that occurred this summer.
6. The MOF Fire Centres must develop much better processes for early engagement of local forest industry, MOF District, BCTS personnel and equipment during initial attack fire suppression activities.

7. The BC government in cooperation with local governments and the forest industry develop enabling language in Bill 91 to ensure that future interface fire management planning and practices can be done effectively and efficiently.
8. The MOF Fire Centres must develop much better processes for early engagement of local forest industry, MOF District, BCTS personnel and equipment during sustained project fire suppression activities.
9. The MOF should review its hours of work and scheduling protocols to ensure that crews are deployed when they can be most productive.
10. The BC government should conduct a review of the processes that led up to the September travel ban Order and the issues dealt with during the ban’s duration with the intent of creating policies related to when a ban should be placed, the geographical area that it should cover, the “users” it should target, the exemption processes, the monitoring processes and the mechanisms for removal of a ban.
11. The MOF needs to ensure that there is a prompt and efficient process to grant harvesting rights to forest licensees to salvage timber in burnt areas.
12. The MOF needs to recognize the added costs of developing, harvesting and processing burnt wood in the stumpage appraisal system and remove any “waterbed” effects to our licensees that are in that appraisal system.
13. The MOF needs to ensure that all “loss factors and risk groups” are recognized in the valuation of burnt immature stands proposed for harvesting.
14. The MOF must provide for the extension of existing cutting authorities beyond the laws brought into force on November 4th, 2003 to ensure as much harvest as possible of the burnt wood before it significantly commercially degrades. This will protect the investments our members have in other areas approved for harvesting that will be forgone in the interim as they harvest the burnt timber.
15. The MOF must provide reasonable relief from the standard “waste” allowances to ensure the optimum economic recovery of the burnt areas.
16. The MOF must allocate sufficient resources to fund the prompt reforestation of all productive forest land burnt during the wildfires.
17. The MOF must use their legal discretion to remove the reforestation obligation on licensees when adequate funding from the MOF cannot be provided.



Introduction

The Council of Forest Industries (COFI) appreciates the opportunity to provide this submission to the “Firestorm 2003” review. Our members harvest timber and operate mills throughout the southern interior. Our member’s employees and contractors live in all the Interior communities affected both directly in interface areas, as well as by the impacts on forest management and timber supply. There were 1,815 wild land fires recorded in the southern interior that burnt an estimated 228,000 hectares of forest land this past summer.

We wish to recognize and indicate our sincere appreciation for the courage, effort and devotion of the men and women who were involved in the struggle to control the multiple fires that threatened lives and property in the southern interior this past summer.

We also wish to particularly acknowledge, with regret, the three forest fire pilots who lost their lives this past summer.

This submission provides recommendations to improve BC’s wildfire management. COFI recognizes and appreciates that the BC Ministry of Forest has the well earned reputation of having one of the best wildfire management programmes in the world.

The comments and recommendations contained in this submission are designed to build on the BC wildfire management programmes strengths and improve BC’s ability to respond in the future to wild fire events similar to those experienced in 2003.

Our submission follows the chronological order of events in fire management from pre-planning to post-fire management and operational issues.

Phase I – Forest Fuel Management Planning and Practice

Issue: Forest Fuel Management Planning and Practice

Wildfire hazards, risks and severity of impacts may be significantly reduced by undertaking proactive treatments on forested landscapes that decrease the concentration and build up of organic material susceptible to fire – forest fuels. This will only be done effectively and efficiently if all jurisdictions work cooperatively and consistently on forest fuel management planning and practices.

Discussion:

Jurisdictional Boundaries

Forest fuel management and the potential implications of treatments focused at reduction of fuel loading cross many jurisdictional boundaries. The majority of the forested land base in the Province lies within the provincial forest and is the responsibility of the Province. However, a significant amount of forest land lies within municipal and regional district boundaries and is comprised of both public and private ownership. There is also a significant portion of the forested landscape in the Province under federal jurisdiction, mostly in the form of parks.

Required Statute for Effective Management of Forest Fuels

Current federal, provincial and local government legislation, regulation, standards and policies do not adequately consider, or in some cases allow for, proactive forest fuel management. Not all of these jurisdictions currently have forest fuel management statute or policy. For those that do, some have conflicting objectives for fuel management. This lack of coordinated and consistent management construct creates a very difficult situation for forest managers and forest fire management personnel.

Forest Fuel Management Planning

Adequate and effective forest fuel management planning and operations requires the cooperation of federal, provincial and local governments as well as private land owners. This cooperation must include management for: planning, risk, liability, rehabilitation, cost as well as public awareness and acceptance issues.

Full Cooperation in Planning and Practice

All levels of forest land ownership – federal, provincial and local government as well as private forest land owners – must address forest fuel management related issues as a complete cooperative otherwise the management plans and operations of one of these parties can be effectively nullified by the lack of management of one of the other parties.

Forest Fuel Management Practices

Forest fuel management practices have wide ranging results and impacts. These practices include activities such as timber harvesting, prescribed burning or physical removal of forest fuels from an area of high risk. A discussion of issues related to commercial timber harvesting in a later section of this submission.

Since the summer, prescribed burning has been raised as a possible "road to Mecca" to prevent similar future catastrophes. While prescribed burning can reduce forest fuel loading and therefore the risk of ignition and spread as well as the severity of fire behaviour, it may not always be the road to Mecca. Prescribed burning has a number of outstanding risks with potentially negative outcomes:

- with the best planning and execution of that plan these burns can become "unprescribed";
- unless there are the necessary weather and fuel indices, coupled with excellent fire ignition and spread, the planned fuel load reduction objectives may not be met thus leaving a hazard after having taken the risk of ignition;
- in most areas of the Province there are concerns about smoke management as well as regulations related to smoke management that may preclude prescribed burning during optimal weather and fuel conditions;
- although it may be somewhat tempered in the short-term because of the fires of 2003, there is a negative public reaction to the "blackened" landscape left for a growing season or two after a prescribed burn has been effected on an area.

Effective prescribed burning requires significant funding for planning, implementation, "mop up" and rehabilitation where required. Where this is a single jurisdiction, this funding will be limited by the budgetary realities of that jurisdiction. However, likely to be more prevalent is the fact that we have this mosaic of multi-jurisdictional landscapes where prescribed burning may want to be used as tool in forest fuel management. Who is responsible for these funds is not clear. The issues of responsibility for liabilities must also be addressed.

There may be opportunities for the physical removal of forest fuel loads in very high risk and high hazard areas. This forest fuel management tool is expensive and again introduces issues of funding responsibilities in single as well as multi-jurisdictional forest landscapes.

Bill 91 – Wildfire Act

The BC government introduced for First Reading on November 24, 2003 Bill 91 – *Wildfire Act*. This Bill provides a platform for government to incorporate legislation to address these issues. COFI has been engaged in discussions with the BC Ministry of Forests (MOF) on this Bill and will be submitting comments on the draft Bill in the next few weeks.

Recommendations:

1. All levels of government need to incorporate forest fuel management planning and operational content in statute, standards and policies in a manner that is coordinated and consistent with all other government jurisdictions over or neighbouring the effected forested landscape.
2. All levels of government must have authority to address high risk and high hazard forest fuel management issues on private land where those risks and hazards pose risks to neighbouring forested landscapes. In developing these authorities for possible intervention, the issues of costs and liabilities must be clearly and fairly addressed.

Phase 2 – Initial Attack Capabilities

Issue: BC Ministry of Forests Infrastructure and Policies

In 1994 the MOF consolidated fire response personnel and equipment into six fire centres located strategically in the Province. This move for efficiency in fire suppression construct will only be effective if a close communication and working relationships are maintained with Districts, forest companies, the Fire Commissioner and other sector interests in the area covered by the Fire Centre.

Discussion:

Quick Response Initial Attack is Key to Limiting Impacts and Costs

Initial attack represents the most effective and efficient strategy to address wildland fires and to reduce their risk and impacts. The MOF has developed expertise and fire fighting methodology that is recognized worldwide.



MOF Ability to Supply Quick Response Initial Attack

Prior to 2002, MOF field operations functions were managed out of 43 Forest Districts across the Province. Last year the MOF consolidated these operations into 29 Forest Districts.

Prior to 1994, each of these District offices was responsible for initiating fire suppression activities within its boundaries. To realize greater efficiencies in initial attack and project fire management in 1994 the MOF adopted a centralized structure by consolidating fire response personnel and equipment into six fire centres around the Province, separate in construct and reporting authorities from their District offices.

The establishment of fire centres represents a significant departure from the decentralized structure previously employed. The key objective of the centralized model was tailored towards a mobile, rapid deployment of specialized personnel for initial attack. We believe that to a significant extent this objective has been realized. However, it must be recognized that with these two restructuring initiatives and resultant management construct, there has been a loss of experienced supervisory personnel, individual expertise, and well trained experienced fire fighters at the local level. As well as these personnel issues, fewer resources are available at a local level for use during extended fire actions like the experiences of this summer.

The summer of 2003 was the first test of this centralized structure in a circumstance of numerous project fires and the abnormal number of interface fires. With understanding, the MOF had difficulty managing and deploying personnel and equipment on concurrent fires. Opportunities for future improvements associated with this centralized structure became evident as the severity of the fires escalated.

Communication

Improvement opportunities for communication were observed through the spectra of communication needs from the fire lines to the control centres both locally and provincially. This issue has already been expressed to the Firestorm 2003 Review by a number of participants.

Human and Equipment Resources

This was an exceptional fire season in terms of both the numbers of fires and the magnitude of the fires. Understandably, human and equipment resources were taxed beyond operational plans and contingency plans. This is a dilemma faced by all planners who have to develop plans that deal with the stochastic patterns of natural events – do you plan for the average experience or do you plan for the worst possible outcome of natural forces? There may not be a “correct” answer to this question at any given time. The plan has to pass the tests of reasonable risk management as well as budget constraints. A key to finding the

right balance of risk and costs is in the development of contingency plans and the ability to effectively operationalize these plans.

Triage and Response Time

As mentioned above, the best and most effective fire suppression tool is initial attack in terms of total impacts and total costs. This summer taxed the limits of the MOF’s systems to quickly evaluate risk, prioritize and deploy manpower and equipment. There have been a number of speculative comments on how the magnitude of certain fires could have been reduced had they been acted upon sooner and more aggressively. While it is not possible to substantiate these views, there is a need to address this issue.

Inexperienced Personnel

This issue is one of the most disappointing and frustrating to the forest industry. Personnel were brought in from the outside were inexperienced and lacked forest and forest fire fighting knowledge. Local experienced forest workers from both industry and the MOF were not utilized in lieu of these imported personnel. Local people know the area, are familiar with local resources and know the capability of local personnel and equipment. By law, the forest industry supplies the MOF with a forest fire “pre-organization plan” that details personnel, equipment and contacts. It appears that these plans were not effectively utilized this summer. Also by law our members must maintain a supply of fire tools, equipment and personnel during fire season. Again, it appears that there was not optimal use of these resources.

Also by law MOF contractors through their BC Timber Sales programme – who collectively are the “largest licensee” in the Province - must maintain a supply of fire tools, equipment and personnel during fire season. It appears that these resources were not employed or accessed during this past summer.

There is clear evidence that where local forest industry personnel and equipment were employed early in a fire event, the results were excellent.

Recommendations:

3. The MOF needs to review the roles and responsibilities of Fire Centre staff and processes in relationship to MOF District staff through all phases of fire management to ensure that the overall management is effective and efficient.
4. The BC government, Fire Commissioner, police, local government, the forest industry and other sector interests must collectively develop a much more robust communication process and protocol to deal with future emergency situations.



5. The MOF must have the budget necessary to develop more robust contingency plans for personnel and equipment that have the capacity to deal with the magnitudes of the fire events that occurred this summer.
6. The MOF Fire Centres must develop much better processes for early engagement of local forest industry, MOF District, BCTS personnel and equipment during initial attack fire suppression activities.

Issue: Local Government's Wildfire Suppression Resources

The magnitude and risk of wildfire interface problems increases as human settlement expands more, and further, into forested areas. Local government fire departments have not typically set up equipment to deal with, or been fully trained, to fight forest fires in interface areas. As previously mentioned, the required protocols and plans to co-ordinate fire suppression activities with provincial and local governments as well as the forest industry need to be developed.

Discussion:

Interface Fires

The issue of multiple jurisdictions and the need for consistent and coordinated planning and practices has already been mentioned in the submission. It is clear that there is a need to develop plans for interface areas that clearly delineate roles and responsibilities during emergencies, communication processes, chains of command, public/private land ownership issues, costs and compensation, training and equipment as well as maintenance and review process.

The new Bill 91 could provide the platform to introduce enabling legislation required to accomplish these needs.

Recommendation:

7. The BC government in cooperation with local governments and the forest industry develop enabling language in Bill 91 to ensure that future interface fire management planning and practices can be done effectively and efficiently.



Phase 3 – Project Fire Suppression

Issue: Resourcing Project Fires

Not all fires can be contained to a small area during initial attack efforts. When this becomes evident, fire managers must quickly change plans and strategies to deal with sustained action on the fire including the identification of resources and personnel needed.

Discussion:

One of the most complex and critical stages in fire management involves the recognition and execution of the transition from initial attack to sustained action or project fire management. During "normal" fire seasons the MOF has historically demonstrated that it has the resources and personnel to effectively contain and extinguish these project fires.

Again, our members were frustrated and foresee significant opportunities to improve delays, clarify roles and responsibilities, improve communications and most important utilize local industry and MOF personnel early to limit expansion of the fire and its impacts. As previously discussed, by law both our members and their contractors as well as the MOF contractors through the BCTS must maintain a supply of fire tools, equipment and personnel during fire season.

Recommendation:

8. The MOF Fire Centres must develop much better processes for early engagement of local forest industry, MOF District, BCTS personnel and equipment during sustained project fire suppression activities.

Issue: Effective Use of Fire Crews

Fire fighters have a limited and finite amount of optimal fire fighting capability during each work day. They need to be deployed in a manner which maximizes this capability.

Discussion:

Earlier Deployment of Ground and Air Support

Fire containment and suppression activities are most effective at first light when typically, temperatures are cooler and the wind is calm allowing fire fighters an opportunity to make advances on the fire. As fire conditions worsen during the day, tactics shift from attack to containment. An effective deployment of fire crew staff would be to have them marshaled



prior to dawn, briefed, provisioned for day and as soon as possible position themselves on the fire line by first light.

This is often the case as well with air support.

Communications

Safety is clearly the number one priority in dealing with fire crews and air support. There must be good mapping available, local knowledge of the area and ability to follow the mapping within the crew. Good communications is necessary to link the crews to both land and air support.

Recommendation:

9. The MOF should review its hours of work and scheduling protocols to ensure that crews are deployed when they can be most productive.

Phase 4 – Emergency Measures

Issue: Application of Operational and Access Bans

The government does have, and needs to have, the legal authority to restrict forest access to all activity during extreme fire hazard conditions.

Discussion:

The forest industry had voluntarily stopped all of its harvesting and road building activities throughout most of the southern interior by mid July – before the large project fires had started. This impacted about 4,000 of our member's woodlands employees for well over two months. As a result of lack of log supply a further 2,000 mill employees were temporarily out of work as mills had to close as their log supply in the mill yard was consumed and not replaced.

As the summer progressed and the fire situation worsened, the government contemplated the need for a complete travel ban in the southern interior and coast. We were pleased that there was some brief communication with us on the possibility of this ban being brought into force. We accepted the need for the government to contemplate this unprecedented action and provided some advice on the processes that they might utilize. Our most important points of advice to the government were related to the actual language in the Order that would bring the travel ban into force and the ability for legitimate exemptions that would be processed promptly, consistently and efficiently.



The MOF agreed with our concerns. In practice, however, we did not experience consistent, expedient or efficient process to receive legitimate exemptions. We also noted that there were inconsistencies between our members and other users of forested land access.

A review of the processes used this past September would be very beneficial in ensuring future bans would have clarity on for deciding; when a ban should be placed, the geographical area that it should cover, the "users" it should target, the exemption processes, the monitoring processes and the processes for the removal of the ban.

Recommendation:

10. The BC government should conduct a review of the processes that led up to the September travel ban Order and the issues dealt with during the ban's duration. The review will create policies to determine when a ban should be placed, the geographical area that it should cover, the "users" it should target, the exemption processes, the monitoring processes and the mechanisms for removal of a ban.

Phase 5 – Post Fire

Issue: New Laws Discourage Salvage of Burnt Timber

Fire damaged timber deteriorates rapidly and must be salvaged quickly. Typically, it has an economic life span of less than a year.

Discussion:

Fire damaged timber is more costly to harvest, more expensive to manufacture and sometimes poorer quality than "green" trees. Our members are willing to work with government to salvage as much burnt timber as possible, however new laws recently brought into force preclude this. These new laws force our members to harvest unburnt areas, that have had significant expense invested in them in order to receive government approval for harvest, or lose this investment. Understandably, our members are not prepared to forgo the millions of dollars they have invested preparing areas for harvest to salvage burnt wood that is often of poorer quality and more expensive to harvest and process.

There is opportunity for the MOF to provide for a streamlined approval process and to fully recognize these added costs in stumpage calculations. There is also an issue of recognizing defects contained in harvestable burnt immature stands.

Forest companies will also face increased operational and capital costs to process the wood. Additional investments may be required to construct milling processes that will isolate the



burnt log chips to insure that they do not contaminate the regular chip supply. Instead of a revenue source, the chips will be a cost driver. Procedures and additional costs will be incurred to segregate and dispose of the burnt chips.

Recommendations:

11. The MOF needs to ensure that there is a prompt and efficient process to grant harvesting rights to forest licensees.
12. The MOF needs to recognize the added costs of developing, harvesting and processing burnt wood in the stumpage appraisal system and remove any "waterbed" effects to our licensees that are in that appraisal system.
13. The MOF needs to ensure that all "loss factors and risk groups" are recognized in the valuation of burnt immature stands proposed for harvesting.
14. The MOF must provide for the extension of existing cutting authorities beyond the laws brought into force on November 4th, 2003 to ensure as much harvest as possible of the burnt wood before it significantly commercially degrades. This will protect the investments our members have in other areas approved for harvesting that will be forgone in the interim as they harvest the burnt timber.
15. The MOF must provide reasonable relief from the standard "waste" allowances to ensure the optimum economic recovery of the burnt areas.

Issue: Prompt Reforestation and Revegetation of Fire Areas

Wildland fires may result in the loss of timber supply, a loss habitat for many species, reduced site productivity and impacts on hydrological function.

Discussion:

Prompt and effective reforestation and revegetation of areas destroyed by fire is essential to restore environmental values, maintain timber supply and reduce the risks of erosion.

The government has yet to provide the summary of the areas burnt this past summer by whether or not they are in the "timber harvesting land base" and if they are, what species, age and site class they have.

From the information we have been able to gather from members, we believe that the MOF's initial estimate of funding required to reforest just the areas that were roughly 20 years old or younger when they were burnt is less than half of what will be required.



Recommendations:

16. The MOF must allocate sufficient resources to fund the prompt reforestation of all productive forest land burnt during the wildfires.
17. The MOF must use their legal discretion to remove the reforestation obligation on licensees when adequate funding from the MOF cannot be provided.

Summary of Recommendations

1. All levels of government need to incorporate forest fuel management planning and operational content in statute, standards and policies in a manner that is coordinated and consistent with all other government jurisdictions over or neighbouring the effected forested landscape.
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COFI appreciates the opportunity to provide this submission and welcome the opportunity to work with the Firestorm 2003 Review and the MOF to further develop these recommendations.

If you require any additional information regarding any of the issues identified in this submission, please contact Peter Affleck (640) 891-1212, Archie MacDonald (250) 860-9663, or Gary Crooks (250) 860-9663.