

Date	Are you familiar with the Land Based Investment Strategy (LBIS)? <a href="http://forestsfortomorrow.com/fft/pm/land-based-investment-strategy/986">http://forestsfortomorrow.com/fft/pm/land-based-investment-strategy/986</a>	The focus of the LBIS is on the best return from investment and activities on the forest and range landbase: Maximize timber volume that is grown in the provincial forest; Grow more timber to offset the impacts in the mid-term timber supply caused by MPB and other catastrophic events. From your perspective, what should be the focus for the Land Based Investment Strategy?	The investment categories supported by the LBIS include: Treatments for midterm (fertilization, spacing, backlog brushing) Reforestation Tree Improvement Forest Health Forest Inventory Fish Passage Ecosystem Restoration Fuel Management Do these investment categories adequately address the goals & priorities of the LBIS? If not, what investment category should be included or excluded?	LBIS investment principles focus silviculture investments into the management units most significantly impacted by Mountain Pine Beetle. From your perspective, what should be the focus for the LBIS investment principles?	General comments or issues regarding the present strategy and process.
07-27-2010	Yes	Carry on and expand landbase investment to include thinning and converting silvicultural slums to productive forests. Also more surveys, VRI and others that pertain to the landbase.	Forest Inventory, VRI etc	More global expanding from the Beetle to more intensive forest research, forest health.	More money has to be put to the program to expand the program to include silvicultural slums and NSR in the interior.
07-26-2010	Yes	I support the primary goals of the best return investment and activities, maximum time vol, grow more timber, yet there is also room to have Licensees play a significant role in the program by ensure SFMP planning can garner public input to ensure there is an acceptable norm to maintain some of Certification through SFMP planning. The costs of maintenance is small and the returns to the province is large	SFMP planning - PAG should be reinstated at a minor cost to keep all certification of BC forest resources known as sustainable. The Inclusion of Fish Passage is a good example where Non-Timber Resource remained eligible to meet Fed Fish priorities. And Fuel Management provides a program to assist the BC Municipalities to feel like they are doing something to address Catastrophic Fire behavior that will adversely affect their community (this is not growing trees) so there are precedences where non timber values are eligible. Continued funding of Forest Inventory does not lead to growing timber, but I do support it since Province must have a Metric to be able quantify the Provincial asset (the trees and their seral stage). Keep the major licensees on board by funding the TSA consortiums their CSA certification maintenance with Public involvement. Consideration should be given to enable eligibility of TUS See 5 General Comments for further comments on TUS	YES but I do reside in one of those units (and I may have a bias) where the longevity of the timber supply is at Risk. What does the province do with communities with Pulp mills in Quesnel, Prince George, Kamloops and Cranbrook if the mid term fibre supply get exhausted. What must be done to keep these profit centers viable. I reside in the Okanagan TSA and have worked closely with all Licensees and First Nations to cooperatively deliver Innovative Forest Practices within the TSA The southern half (1/2) of the TSA will be decimated if meager funding is stretched across all the province. Is there a price to be paid for immediate benefits to Society for having Industry and First Nations work together without significant conflict and disruption of fiber flow mills already stretched to below break even cash flow. I do believe there is room for prudent non timber program eligibility (fish passage, SFMP, fuel management)	The Merritt and Okanagan TSAs have effective IFPAs that are working collaboratively to manage the TSA with full participation of Industry & First Nations & BC Timber Sales. For the past two years the OIFS has effectively delivered many timber and non timber inventories AND the Okanagan Nation Alliance has delivered the FFT program. The ONA under new management personnel is now effectively delivering cost effective program by working as a member of the OIFS. Effective deliver using prudent funding to support TUS, should be considered eligible to maintain positive fibre flow in both TSAs

07-23-2010	Yes	Focus on sites that will produce the highest return on silviculture investments. Use site index to determine the best sites.	The categories listed are in the correct order in terms of priority. I see the top 3 or 4 as the most important. Funding should be allocated accordingly with the bulk of it attributed to the first 2 categories. Drop those near the bottom of the list as funding is depleted.	Site index. To determine eligibility, set a threshold site index for those projects in MPB affected management units. Restricting funding to only highly productive sites will maximize return on investment and ensure more diversity in the types of projects funded (don't put all eggs in one basket - may allow funding for other mid-term priority work including spacing) and the geographic distribution of them (other areas of the province could be eligible for silviculture investment on priority sites).	MPB recovery work is important but...is it the most important? Funding distribution must consider more than economic crisis for MPB affected communities. The process should consider all silviculture enhancement opportunities provincially and prioritize them based on projected return on investment.
07-21-2010	Yes	The focus should include projects that relate to the protection and conservation of the forest resource, in addition to activities surrounding sustainable forest management (ie. certification initiatives etc.). The focus should not only be reactive but strategic and pro-active as well.	Resource inventory work and monitoring should be included.	No one can argue that silviculture investments are essential however the LBIS should not only be "reactive". The focus should also be forest health (for various pests / insects) so that one is not faced with this same problem in various units down the road.	Take a close look at the strategies and plans completed for the FIA program. There is a lot of information that could and should be applied here. In general, one could have modified the FIA program slightly by directing priority investments by management unit rather than stripping the program. Putting investments in only a few units and ignoring outstanding issues in all other units will only result in problems down the road.
07-18-2010	Yes	all projects should require quantitative and objective ranking and approval based on rate of return and potential to create actual harvestable area (not just additional AAC) during the mid-term falldown. such quantitative objective criteria are currently lacking and not required by FIA.	Treatments for midterm are only projects that will meet stated goal. Remainder should be excluded, or change the goals.	rate of return and potential to create actual harvestable area (not just additional AAC) during the mid-term falldown	Agree with the more focused strategy. But a separate program bridging "tree growing" and scientific long-term research is needed. A program for operational research and trails requiring that this research be published in JEM or by other means is also required. Such a program will help to ensure that research results become operational and do not sit on a shelf somewhere.

07-16-2010	Yes	It's not all about timber volume. It's also about healthy forests. Healthy, resilient and biologically diverse forests might offer less volume, but that in perpetuity. The emphasis on fertilization and "tree improvement" is short sighted in my view as it does not address long-term health / resilience.	probably adequate to address the current LBIS goals	The focus is justified, but to shut off the silviculture industry on the Coast is short sighted. Sufficient funds need to flow on the Coast, too, and not primarily into helicopter application of fertilizer. If you want the last rest of enhanced silviculture capacity to survive on the Coast, you need to make that possible by spending enough money on spacing / pre-commercial thinning, pruning, manual fertilization, new backlog projects.	Re process: the transition papers came out way too late. It even created the impression that it was an equal goal to prevent spending the whole planned allocation in order to be able to return more to the government. No input was sought in the development phase of the LBIS system. It does not make sense to exclude the expertise of those who implement landbase investments. The way woodlot administrators were handled was simply unfair and arrogant. Decreasing the DA% is largely unjustified based on assumptions that do not translate into the real world. Lumping all WLs into one investment schedule creates an artificial world with the only goal to justify a lower DA%, but it does not work this way. Canceling FN info sharing remuneration is another example of not being in touch with the WL reality. You will lose experienced administrators, because the expected actual remuneration per hr does not make financial sense for them. You will likely need to increase the relative amount of funding for WLs. The greatest strategy will not go anywhere (in the WL world), if you don't have capable people to implement it.
07-16-2010	Yes	more broad-based! updated ecological inventory to reflect changes brought about by said events - also research that examines effects of events & management responses on ecological components	research to determine effects of treatments on biodiversity; more broad-based forest inventory including fish/wildlife	return money to areas where harvesting has occurred - proportionately. Don't siphon from one area to give to another. Forest companies will make better decisions on where to spend the money (by geography or subject) than being told by government	very disappointed in the new direction being taken by LBIR administrators. Understand the problem, but feel that the reins have been tightened too much as far as distribution of FIA funds and allowable projects are concerned. Go back to the previous model.
07-15-2010	Yes	Growing more timber is a high priority. Maintaining access to timber should likewise be considered; lack of information about other forest values constrains timber access in some cases. Significant investment in maximizing volume is being made in areas where ROI is not the best in the province, and where there is considerable risk from climate change, MPB, and other catastrophic events.	Forest inventory is narrowly defined in application. Past investments in Recreation Sites are at considerable risk, as they are no longer eligible for maintenance.	Investments that improve access to timber in the short term (i.e. information gaps); that have best ROI in the medium (i.e. fertilization) and long (i.e. tree improvement) term.	The centralization of the process of 2010-11 strategy development to MFR without consultation with recipients has resulted in a one size fits all approach for the most part. Lack of planning with other government agencies and implementation partners has resulted in ineligibility of funding for long-term projects, but no opportunity to establish alternate funding mechanisms. Significant gaps are apparent. Timing of this process was poor; the former process should have continued for one more year while MFR addressed its human resources, and then proper consultation could have been undertaken to develop a renewed FIA strategy for 2011-12.

07-13-2010	Yes	It must be more than just the beetle event. It must maximize the quality and quantity of the forest resource. And a monitoring program is a must.	It must include all of the above. Very important.	It must focus on the whole economic forest resource	Clearly, More money is needed to do even a minimum job. It is a huge valuable resource. Much of the logging on the coast today is because of the spacing and fertilization programs 20 years ago.
07-12-2010	Yes	The focus of the LBIS should also include those projects which assist in meeting Certification requirements, including biological/ecological based projects. The LBIS should also be more equally distributed across ALL regions of the province, not just those with mid term timber supply impacts.	There should be more analysis done on whether tree improvement and fertilization will provide the actual benefits that are anticipated. Again, projects which assist licensees in their Certification processes should be added to this category listing including biological/ecological based projects,	The LBIS investment principles should be distributed more equally across the province. It is not reasonable to entirely exclude management units. I question the validity of focusing funds to the MPB impacted management units while excluding others, as the other management units could utilize the funding for important projects.	Lack of timely information to licensees has been unacceptable. If the Ministry was planning to change the focus of the LBIP, this should have been disclosed to recipients in a much more timely manner, and an opportunity for licensee feedback should have been provided. The Ministry has made funding decisions without having all of the facts. Excluding management units because of a ranking system determined by the Ministry is unacceptable. Segregation of BCTS from the recipient LBIP process this fiscal does not make sense. BCTS was a productive member of the FIA process for the past several years and to remove them once again from the process further segregates funding within management units. Many management units worked in a collaborative effort regarding funding and the resultant management of funds was very effective. Segregation of BCTS from other licensees within a management unit has removed synergies that were previously effective. Measures to reduce delivery allowance while increasing licensee responsibilities under the delivery allowance are not acceptable. It is not feasible or reasonable to combine licensees' allocations when determining delivery allowance if they operate in distinct areas with separate management units. In addition to this, the decrease in percentage of delivery allowance is too much. In general the turn of events with respect to the LBIP is discouraging and resulted in a waste of previous investment of taxpayer's funding. At the very least there should have been more of an opportunity to complete projects that have been commenced, rather than cancelling them altogether with little or no notice. Re: Fish Passage: There needs to be a different methodology on how projects are selected for funding AND this needs to be made clear to recipients PRIOR to funding submissions. I certainly hope that next fiscal is delivered more effectively and with parameters that are more acceptable to licensees, First Nations, and Ministry alike.

07-12-2010	Yes	There should be a mix of investment in both mid-term and long term silviculture. Look after the existing investment (e.g. FFT reforestation ) with appropriate follow-up (e.g brushing) to ensure success.	Yes, categories are adequate	The current Timber Suuply Review analysis for the Prince George TSA indicates a well defined drop in mid-term supply from years 10-50 from 2008, regardless of the scenario. Investments can help mitigate some of this falldown and impacts to communities along HW's 16 and 97. Continue to lodd at opportunities for back-log brushing and fertilizing.	
07-12-2010	No	Broad range of investment in Silviculture, Inventory and Forest Health assessments and operational tool development.	Looks good	Adequately ensure the health of the forests being reforested and treated. Given that there is little if any money going towards forest pathology assessments and operational tool development - it's hard to believe that risk is adequately addressed.	Doesn't appear to be a lot of focus on evaluating forest pathology risk to silviculture investments or to the tree improvemnt investments. This is very short sighted.
07-11-2010	Yes	Maximizing timber growth should be one objective, but also there should be a focus on other forest values that licensees don't do in their current obligations (e.g., trails, recreation, innovative studies, etc.)	spacing should also include pre-commercial thinning for uneven-aged stands	Areas impacted by MPB, but also other regoinally relevant forest health issues (e.g., that fungus killing young pine in the NW, spruce bark beetle in the Interior wet belt). Also, it should focus on productive areas with good site indicies, but be spread out geographically in the province.	delivery allowance has been reduced drastically - this will present challenges in delivering the work, result in junior people doing it rather than experienced consultants.
07-09-2010	Yes	Develop Legislation and Policy to support maintaining AACs and guide implementation to meet this goal.	Research into opportunities to increase AACs.	OK with existing.	Opportunities for increasing Area-based Tenures should be explored.
07-09-2010	Yes	Dry Belt Douglas fir management multi year investments, approved in the Spring not in July August	No. The mid term is in 20-40 years. How does Reforestation, fish passage, ecosystem restoration and Fuel management enhance the mid term ?	I like the current Strategy. Lets invest in the land for returns in 20-30 years.	It takes to long and is year by year. Projects should be multi year .
07-09-2010	Yes	A stronger focus on fuel management	Recreation...we are abandoning Rec sites right now	invest evenly in all areas	the investments goals for 2010-11 were so narrow that i think we lost many opportunities to invest in very worthwhile projects
07-09-2010	Yes	Maximizing timber production of tree species with the economic highest value.	Yes	That is correct for the interior. For the coast it should be focusing on increasing volume and value on 2nd growth stands with medium and poor site index.	It is hard to put together a silviculture project and receive the required funding on CF that have small AAC.
07-09-2010	Yes	This is an appropriate focus, replace timber volume with value. However, the abrupt shift of focus from things like recreation are a bit problematic.	Yes	MPB is the single largest timber supply issue in the province.	PWC should rely more on professional reliance and stop spending time and money auditing small projects.

07-08-2010	Yes	Road deactivation as this has direct linkage to fish and habitat. Silviculture is equally important.	Add deactivation as this can be a very visual concern and has direct linkage to water quality.	Short term benefits can be achieved in the near term with fertilization and other practices throughout the province. Don't walk away from successful and proven programs in other areas of the province.	In the past, a district could focus on the highest priority issues be it inventories, silviculture etc. Provide some autonomy to the districts to implement whats best for their area based upon local knowledge.
07-08-2010	Yes	ok	Include Change Monitoring Inventory	Include Watershed Restoration	
07-08-2010	Yes	The LBIS only focuses on one main aspect which is mid term timber supply prioritized to those areas that will have the most servere impacts. While this is a good focus it should be the focus for TFT . I see it a as a money grab from the Land Based funds into trees for tomorrow responsibilities. In our area Caribou Management is a critical issue and the constraints that may come from that are equal to the constraints from losses caused by MPB.	In our case Caribou research and recovery plans.	In our area we have a very good LBIR group of all licensees that puts very good projects forward that enhance our region. I think the LBIS focus should look at the various LBIR and fund those projects that have significant merit no matter where they are in the province. Keep the current focus to invest in units that are the most severely impacted by MPB but fund them seperately.	As we are in an area that recieves no funding it is hard to be positive about the current strategy. Tenure reform away form volume based tenures may encourage licensees into investing in mid term supply problems. The current program has moved a long way form the original intent of the program. There is no denying that the MPB is causing servere problems but to switch most of the funding to that while ignoring other real issues around the province without any consultation with recipiants was not the right way to go. I would have prefered to see the LBIS broadened in scope to include some of the existing programs even if they remained unfunded. I would then have some hope that we may get back to those programs when money starts to flow again.
07-08-2010	Yes	Grow more timber and focus on timber quality.	The highest priority should be reforestation with the focus on quality.	High ompact areas	No timely direction, no sinergy between two branches. Regions and districts are out of decision making process. Hope time will bring some good changes.

07-07-2010	Yes	<p>The focuses are not unreasonable ones. There are two additional focuses to recommend, and there is one precondition that should be in place for there to be any validity to the measurement of success. 1. The strategy identifies the "Great Goal", which specifically mentioned water quality. It also speaks to silviculture activities assisting watershed management and restoration. As both water quality and quantity are identified priorities of government is a host of initiatives, it is not clear why the significant risks to the success of those initiatives are not also a focus. Silviculture may address timing of flow and ECA concerns; however it does not address the immediate hazards and potential consequences brought on by governments lack of funding or initiative to address a backlog of historic forest road /mining development risks, damage from range use, and general riparian system damage. It is strongly advised that management of water quality risks be an additional focus. 2. Government has not yet explained why they remove certification initiatives from eligibility. BC Timber Sales is one of the larger licensees in the province, and is heavily involved in certification (paying the costs). Government uses the high degree of provincial forest certification for benefit politically and in various initiatives. Given the lack of licensee input to the new LBIS priorities and low current delivery allowance there is little benefit of continued licensee involvement in program delivery. Perhaps maintenance of a focus on certification would provide some incentive for continued participation. 3. In any reasonable assessment of mid-term timber supply, or in measuring the success of the two focuses listed, it is a precondition that the landbase be well defined and the timber inventory (mature and immature) is a reasonable representation of what exists (if you do not know what you have, how do you measure it?). It is strongly advised that inventories which assist in defining the forested landbase be an on-going priority of government. Priorities for this work would include; Phase I and II VRI, CMI (as vaguely identified in the strategy), Terrain Mapping, Backlog surveying, PEM/TEM mapping. Other inventories should be the responsibility of the responsible agency and outside of the LBIS. It is important to note that maximizing volume and growing more timber may provide benefit only if that volume will be realized at some future date. What precautions has the Ministry taken to ensure its' investments will be protected from land use alienation in the future?</p>	<p>This question is a difficult one to answer. Specifically, there has been no documentation or analysis provided or published that supports your contention that the mid-term treatment silviculture investment categories as set out will, or could, address the goals and priorities with the investment criteria specified. It appears that someone believes stand level silviculture treatments will achieve the desired result, or perhaps politics is overriding professional expertise. Regardless, the allocation of almost 70% of funds to silviculture in hopes of addressing mid-term timber supply appears on the surface to be misguided. I would recommend reducing that proportion significantly and focusing funds on the additional areas of: <input type="checkbox"/> Watershed Restoration, Environmental Maintenance, and Deactivation to complement Fish Passage works. <input type="checkbox"/> Increased funding to VRI Phase I and II <input type="checkbox"/> CMI <input type="checkbox"/> Basic mapping of attributes defining the forested landbase <input type="checkbox"/> Forest Certification It is not clear why, in an era of climate change, such a focus is being placed on ecosystem restoration. It is also not clear why there is a focus on invasive plants, given that there is no coordinated or clear strategy among or between agencies to manage the "big picture". The key objective for this category is vague and the measurability of success in meeting the objective unclear.</p>	<p>For this question, it is recommended that before assessing what the focus of the principles should be, one should focus on the principle itself. I am unable to make a linkage between principle i) and iii) particularly in MU's where the MPB has delivered a significant blow to timber supply. Has any forest level analysis been completed to confirm that investments will meet the Ministry's ROI criteria in units like Quesnel, Lakes, Williams Lake, or Merritt? In the short term it would seem the focus for funding should be on allocating funding to priority areas that have some chance of "maintaining" a forest manufacturing employment level, rather than pouring funds into areas where the law of diminishing returns will apply and a structural change in the wood products manufacturing side of the economy is a foregone conclusion. An analysis should be conducted to confirm that any investment is returning stands to production will have a fundamentally different effect on the timber supply curve than a natural regeneration strategy, and thus a fundamental benefit to the maintenance of existing industry.</p>	<p>First, one cannot fault government for wanting to set its' own investment priorities; the coming of the LBIS has been simply a matter of time. How the program was developed and rolled out has, however, been a significant disappointment. Documentation or science supporting the current strategy is not referenced or readily available; in the absence of which there is little confidence among some participants that it will achieve its' objectives. Further, the lack of involvement of past delivery participants in the development of the priorities, as well as the ad hoc approach to 2010 delivery have left many pondering where the incentive is for future participation in the program. While there may be a common interest in the resource, interest ≠ incentive. Government must recognize and address a number of issues if their objective is to bring past delivery participants on side with the LBIS and its' delivery. If this is not an objective, it should be clearly stated. Consider.... <input type="checkbox"/> If you believe in the strategy as set out – defend it with supporting documentation. There remain many open questions. <input type="checkbox"/> Open communication channels with those outside of government on: <input type="checkbox"/> Funding levels <input type="checkbox"/> Program priorities and distribution of funds, <input type="checkbox"/> Annual timing of funding, <input type="checkbox"/> Delivery model, <input type="checkbox"/> Delivery allowances, <input type="checkbox"/> Focus areas. If your objective is to have a draft 2011/12 strategy in November, discussions should be initiated now.</p>
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07-07-2010	Yes	Increase funding to a level that will restore upstream fish passage to 2,000 km of stream per year, every year, for 5 years.	Fertilization must be dropped. Using fossil fuel derived nutrients runs counter to sound climate change policy. Increased CO2 emissions will occur when the fertilized trees are harvested, i.e. the increased net primary production underground will eventually rot and release CO2 !!!)	There are 2 prime principles: 1) invest in any activity that demonstrably and significantly reduces CO2 emissions from the forest and the forest industry, i.e. grow more wood, protect more forest, devise improved/new/different solutions for forest transportation/ industrial work methods). 2) Restore interior terrestrial and aquatic ecosystems to natural levels of resiliency by: a) increasing the frequency and area of fuel modification/prescribed burning. Start at 50,000 ha/year and double the area treated every year for 7 years (6.35 million ha total); (logging does not count) b) increasing the kilometers of stream restored for fish habitat. Start at 500km restored per year doubling it every year for a decade (total km restored is more than 511,000 km – yes, that much is blocked). Address 1 and 2 for a better and survivable world. Steve Jones 250-492-7801	Determine what activities represent low risk to the environment and provide Provincial level information sharing to FN's so that activities such as fish passage restoration do not have to be referred every year, i.e. blanket information sharing for FP.
07-07-2010	Yes	Maximum long term return on investment on land based forest activities. Priority activities should include: road deactivation in community watersheds; improve fish passage for high value streams by road deactivation or culvert replacement; incremental silviculture.	These categories adequately address the provincial goals and priorities. Treatments for midterm should consider the Coastal Silviculture Strategy.	The focus should be on return on investment.	I understand that the impact of Mountain Pine Beetle has been devastating but I'm not convinced that treatments for midterm in the Interior are going to bear fruit.
07-07-2010	Yes	The focus needs to be management unit specific. Centralized project allocation in Victoria is a questionable strategy.	This is simple but too simplistic to be realistic: 1. Reforestation is an operational requirement. If part of rehab then broaden this to all rehab activities. 2. Tree Improvement: seedling production is already funded by a multi-year contract outside FIA and the rest (breeders, stations, etc) is off-loading of what should be core MFR funding. 3. Ground based forest health projects at a management unit level make sense, the rest is off loading. 4. Forest Inventory: Off loading - utility if there is engagement at the management unit level. 5. Fish Passage: This is worth while continuing - backlog. 6. Ecosystem Restoration: This is worth while continuing - backlog. 7. Fuel Management: Unconvinced that what is being done is effective - but useful to continue as a job creation tool.	The principles are OK but investments are wasted if other parts of government restrict the benefits. Some latitude for IRM/SFM work that enables silvicultural activities & benefits would be a practical addition.	Doomed to fail unless there is engagement at the management unit level. History will repeat itself.



07-08-2010	Yes	<p>The focus of the LBIS is reasonable given the current issues in BC forests however the critical factor missing from this paradigm is an understanding of what kind of “timber volume” we are managing for. The investment categories tend to favour treatments historically focused on producing sawlogs (fertilization, spacing etc.). Is the objective to maximize the production of single entry sawlogs, or should the maximization of “volume” also consider multiple entries and other wood products (perhaps even some products we have not yet considered)? Are we managing for quality or quantity or both?</p>	<p>Fish Passage – while this category is a factor in addressing the goal of “well-managed forest and range resources”, it is unclear why fish passage is included as an investment category while other ‘values’ such as mule deer winter range or Species At Risk are not included. Mature/Dead/Unsalvageable – reforestation efforts shifted to include treatments in older age classes in poor quality or uneconomic stands. Post Free Growing Monitoring – a strategy for monitoring and incremental silviculture in all stands where free growing obligations have been met. Additional Treatments to address mid-term timber supply – •Impeded Stands which are sufficiently stocked, but impeded and within 50 years of harvest should be targeted for treatment where it makes sense (site index, accessibility and potential for release would be considerations). The difference between this category and those already mentioned in the LBIS is the widened scope including natural stands. •Understory Retention – identification of mature, MPB affected stands with adequate understory retention, and treatments to improve/enhance retention for the mid-term</p>	<p>If the LBIS is truly about forest investment and productivity (rather than a short term response to the MPB outbreak), it follows that dollars be directed towards the forest asset as a whole, and specifically towards those aspects demonstrating the best return. It is in the best interest of the forest industry for government programs such as this to be proactive rather than reactive. Investment in and monitoring of BC forests should be consistent – both geographically and temporally – if we are to improve the value of our forests and the viability of the forest industry and communities in the short and long terms.</p>	<p>Issues regarding the present strategy: •One of the goals of the LBIS is “co-ordinated and integrated planning of the use of forest and range resources” however the Planning and Implementation Frameworks do not address how this will be achieved on a landscape level. There is no mention of an integrated resource plan: what it might look like, and who might be involved (licensees, government, First Nations). •What is the LBIS doing to address other forest users, wildlife issues, Species At Risk, or Landscape Level Biodiversity to mention a few? •The current strategy is not clear in its direction regarding the types of forest products the LBIS is managing for. What are we producing? Is it wise to assume that the BC forest industry will continue to produce primarily sawlogs and pulp into the mid and long term? Issues regarding the present process: •While it is understandable that the current MFR business transition means changing priorities and slow release of program direction and funds, this has led to a reduced ability to spend the LBIS dollars and a compromised ability to implement the program. •Shifts in government funding and priorities (such as the new LBIS direction) seem to lead to any number of cancelled or incomplete projects from a previous “direction”, and as a result the original investment is either lost completely or is compromised. A good example of this is the on-again, off-again fundability of backlog silviculture through various government initiatives (FRBC, FIA, FFT).</p>
07-07-2010	Yes	<p>Offset impacts in the short term timber supply (next 3 to 20 years) caused by MPB.</p>	<p>Silviculture investments, with the exception of fertilizing near rotation trees, will not alleviate the short term (next 3 to 20 years) timber supply. In addition to silviculture, LBIS for MPB areas should include enhancement of data specifically for implementation of multiple account trade-off analysis to determine the appropriate mitigation strategy and opportunity in relation to TSR requirements.</p>	<p>Agree with MPB focus. However, should also consider economically challenged areas outside of MPB areas.</p>	<p>At the TSA level local licensees, agencies, existing entities and stakeholders should be consulted to co-develop a specific 5 year strategy. The strategy needs to be “co-owned” at the TSA level.</p>

07-07-2010	Yes	Timber volume should be maximized on richest growing sites where a silviculture strategy II has been completed and treatments are to be completed annually. Where backlogs exist funds should be focused to catch up on untreated area. Focusing funding in areas which will assist in bridging the MPB impacts is critical in minimizing short term timber impacts. This means TSA's/TFL's with coastal conditions with high SI's and a low pine component require high investment on incremental silviculture. Focusing funding in MPB impacted TSA's will not alleviate short or mid term timber supplies.	Recreation is a cheap and effective way to gain community support. Removing this as fundable project is not rational. It may not meet the overall priorities of the LBIS but should be considered. Restrict investment if necessary to maintain dollars already spent...this is not a large dollar figure.	As expressed above. Incremental silviculture investments should be focused on high SI sites within the CWH, ICH and other subzones none pine contributing. This will assist the province in bridging short/mid term timber supplies impacts with maximum benefit and low risk to investment dollars.	I believe the overall concept is on the right track but dollars need to be focused where investments will obtain the maximum benefits with the highest return on investment. NOT in the interior where SI's are lower than the maritime and sub-maritime ecosystems exist. Government should of bridged this program over two years so that some areas within the province were left with zero funds for investment purposes even though Silvi. Type II analysis states clearly that investment is be carried out annual. Not happening and backlogs are building substantially, putting bridging districts at risk of not contributing to meet the short term timber impacts provincially. Seems this process is driven by politics more than on sound forest management principles and value for dollar.
07-07-2010	Yes	The LBIS needs to manage for both timber and non-timber resource values. The LBIS needs to focus on planning, prioritizing and delivery of projects at the local level that directly supports existing and new economies on the land base, but no limited to timber values only.	Absolutely not - how can we implement these activities cost-effectively without local strategic planning. We need a planning mechanism eligible under the LBIS program that capitalizes on local knowledge and information and also engages stakeholders, First Nations and local government to lead the process.	I think there is more to fixing MPB impacted areas than just silviculture investments. How can you not account for non-timber resource treatment objectives? Why wouldn't you choose a silviculture treatment that also compliments management for non-timber resources such as wildlife and plant species, especially those of First Nations traditional use? And how would you achieve this without expanding on the LBIS to include other non-timber resource activities?	The LBIS is short-sighted when it comes to maximizing value to tax payers and the forest industry. It lacks attention to and cuts-off the funding on short-term information needs for sustainable forest management over the landbase. The best way to mitigate MPB impacts and mid-term timber supply is through a sustainable forest management model, not an intense silviculture model.
07-07-2010	Yes	support for timber based rural communities and the forestry infrastructure that lives and works there. ie: local loggers, silviculture companies, woodlots, community forests. Use forestry wisely to save our towns.	Inventory, Fish and Ecosystem are MFR interests and as such should be funded from MFR budgets. Put the money in the trees, not in consultants and MFR pockets.	Rural areas. There should be a sound financial commitment to a certain percentage of the money actually hitting the ground in rural areas. Not Vancouver, Victoria and Regional offices.	Get real with the delivery allowance so we don't have to play games to get the work done - the industry identified 14% as required back in the days of Section 88 - how many times do we have to relearn that?
07-07-2010	Yes	Create employment and education in the forest industry	They are too broad and should be more focused on fewer items if funding is limited. Reforestation and associated management for stocking establishment and growth.	Restock these sites	Let get back to the basics
07-07-2010	Yes	The focus should be broader, and include a wider range of resource surveys and activities	The goals and priorities are too narrow.	Investments should be made across the province. If MPB impacted areas need additional funding for mid-term timber, etc., they should have a dedicated beetle-related fund for that narrow purpose. LBIS should be a broader, more inclusive program.	The present strategy is too narrow. There should be more flexibility for area-based licensees with long-term tenure to determine what investments are appropriate on their landbase

07-07-2010	Yes	1. Projects that bring more NSR and marginal stands (ie. MPB-impacted stands) back into production with MSP/planting. 2. Forest Inventory - help mitigate midterm timber supply issues with better information 3. Tree Improvement (fertilization) and other projects that increase the MAI on the landbase	Yes, they adequately address the goals and priorities of the LBIS.	The return of productive lands to productivity and other projects that address mid-term timber supply issues.	
07-07-2010	Yes	Its a provincial LBIS, therefore it must focus on provincial level strategies - mid term and long term timber supply.	Forest Health is a very broad category. Some investments are very critical from a provincial perspective - eg MPB, gypsy moth, DF Tussock Moth. Is there a list of priorities? FH inventories and other forest inventories should be excluded, given their own committed funding. Commercial thinning should be included. Fibre from CT, spacing, rehab and backlog brushing are all potential feedstocks for new products.	Rather than focussing on MPB areas, set a timber supply % drop threshold and focus on TSAs or MUs that have a drop greater than the threshold regardless of the cause.	Add regional strategies to future LBISs
07-07-2010	Yes	Additional focus should be on: - Fish and Wildlife habitat studies to mitigate/manage impacts to timber supply. - Watershed assessments. - Environmental Rehab of old resource roads. - Improvements of existing resource roads( bridge replacements, alignments for safety, fish passage). - Grow more timber in all management units - not just MPB affected areas. - Archaeological assessments and traditional Use studies.	The following should be included to adequately address goals: - Fish and wildlife studies. - Watershed assessments - Improving Resource Roads(FSR's) and Rehab of old non-status roads. - Arhaeological and Traditional Use studies. - Support timber supply improvements in all management units(not just MPB). -	Focus should be on all management units and regions of BC. MPB impacts should be a totally seperate pot of funding.	Strongly disagree with current strategy and delivery model. Funding should be targeted to all management units to focus on issues within each unit to improve timber supply as well as deal with wildlife, environmental, watershed, archaeological, and road issues. Delivery of programs should be carried out by Licensees or IFPA groups to maximize efficiency.
07-07-2010	Yes	Just as stated in the LBIS	OK as is	This strategy does not consider the coast. There are management units on the coast which are having significant AAC falldowns which should also be considered. For example, I understand that the LBIS has no \$ for spacing on the coast for 2010/11. Spacing \$ in the Fraser TSA would be very useful in meeting the LBIS goals provincially.	Consider the coast.
07-07-2010	Yes	Agree with current strategy focus	yes	agree with current focus principles	
07-07-2010	Yes	Considerations for ongoing maintenance of Recreation Infrastructure and Trails.	Include Recreation Infrastructure Maintenance and Development.	Restocking with alternate species.	Lacking knowledge of some TFL management plans and objectives.
07-07-2010	Yes	Planting	Yes	It should be province wide - every TSA has a need for silviculture investment, and every TSA has been suffering lately, not just the MPB areas. Nor are the MPB areas the hardest hit in terms of lack of employment/investment.	

07-06-2010	Yes	Growing timber. Mange the increased water runoffs that are caused by the dead pine stands. Deal with hot issues such as fish passage although this might be too expensive and may be better addressed by allowances to the companies so that they can fix the problems.	The above categories cover most of the strategies that I think are important. I would also consider some form of improved inventory. I am tinking of the young pine stands (ages 20 to 45) that would have been free to grow and are now dead from mpb.	Reforestation and some work on fertalization of stands that would make a significant difference to the midterm timber supply.	
07-06-2010	Yes	To maximize the timber volume regardless of where it is (don't prioritize one district over another as it shouldn't matter whether it's on the coast or in the interior)	I think fish passage should be more a focus of MOE, not MFR, however the other subjects are appropriate	If it is a focus on areas impacted by MPB, it must be ALL areas impacted by MPB, not just the south. Some areas of the province (the Northeast) are being impacted now, and also need access to the LBIS.	I appreciate that scarce dollars need to be prioritized, however I don't think that areas should be excluded from the outset; if a project is needed/can be proven to be needed with a solid rationale, then it should be allowed. To exclude areas doesn't achieve the objective of maximizing timber volume.
07-06-2010	Yes	#1 mid term timber supply, impacted TSA's with Type 2 strategies in place and proof of ROI #2 Forest Inventory in impacted TSA's to better figure what is actually left post MPB which contributes to TSR #3 Tree improvement and reforestation efforts	Ecosystem restoration, how do you determine a restoration process when affected TSA's were affected by a "natural" process of climate change and insect?	start with the Type 2 and ROI	
07-06-2010	Yes	As mentioned above - however, MPB is only limited to part of the province - other areas, such as the NW, have struggled with more significant economic issues for decades - stand enhancement in those areas (such as the NW) would significantly improve harvest economics in the future. That is, funding should definitely not be concentrated in MPB-affected areas.	Yes	As above - clearly, funding should not be limited to MPB-affected areas. Firstly, because other factors (poor timber quality, access) are issues in other areas, and secondly, because stand level economic return is greater in other areas - such as the coast or NW in particular.	Need to better acknowledge the importance of spacing, in particular, to enhancement of mid-term economically-viable timber supply in certain areas - particularly NW - Kalum in particular.
07-06-2010	Yes	Offset impact of in the mid-term timber supply in TSA's in the province affected by MPB.	Exclude : Fish Passage and Fuel Management	As stated in question 2 above.	The present plan is too prescriptive. Should be only strategic - targeted TSA's and targeted levels. Delivery branch should be given the mandate to design program levels annually.
07-06-2010	Yes	best return from investment and activities on the forest and range landbase is the right focus - however, this must be interpreted broadly. "Return" is not just from generating more timber volume.	ok	I don't think it's quite that simple. For example, the benefit society receives from fuel management around a town in a management unit moderately impacted by the MPB may be greater than the benefit society obtains by planting trees in a unit more heavily hit by MPB. Potential return is not perfectly correlated with degree of MPB damage	all in all, good work on the LBIS

07-05-2010	Yes	For me, the critical objective should be to grow more timber in landscape units severely impacted by MPB. Saying you need to achieve a 2% ROI on every investment may mean some TSAs are given a lower priority when real jobs and potentially a sawmill could be shut down. Objective should be to show a measurable benefit to mid-term timber supply.	For the most part, these activities cover the gambit of potential investment opportunities. The individual mix for a TSA should be the decision of the TSA.	Yes, we need to work in the TSAs most severely impacted by the MPB. TSAs with mixed species stands are much more resilient and better able to withstand the MPB impact. TSAs and communities where mills and jobs are going to be lost in the very near future should be where we focus.	Getting the money to the TSA level seems to be the biggest hurdle. Right now projects for the WL TSA are being bogged down by Kamloops with no interest in finding a way to move forward. How do we get the money out to the TSA where it can be utilized to do some good. Simplify the process, we need to look to groups like the Williams Lake FFEP group to get investment onto the landbase. Thanks.
07-05-2010	Yes	Maximum economic benefit per TSA to timber supply. This can go far beyond the current limited scope of the current program as a lot of money can be spent on midterm timber supply in an area that can not be increased enough to support a mill in the midterm. Another area can dramatically outproduce the return even though they are not a priority area.	Why limit the options? If the projects can show a benefit to timber supply then why limit to predetermined categories. The goal should be revisited.	As the previous comments point out we have determined MPB will decimate the midterm timber supply but not proven that putting money into midterm in these areas will justify the expense over other areas. Other areas just have different issues and we will be looking to those areas to produce the finances to the crown for the mid term drops in other areas. So we should be considering offsetting drops in some areas with efforts in some of the more productive areas that will still be operating facilities during this slow period.	Are the priorities to put all of the efforts of strategic planning (Type II strategies) into the priority areas for one year or is there going to be a more TSA Region/District driven process to determine best ways to improve the midterm opportunities followed by a type II analysis. This would mean all areas could initiate this process and a better comparison of where to spend LBIP money could be done rather than assuming that the hardest hit beetle areas are the best place to spend money.

07-05-2010	Yes	<p>If it is truly supposed to be a land based investment strategy then it should consider all land investments not just forest and range. In actuality, it is probably mis-named and should be a Forest &amp; Range Investment Strategy (FRIS). The focus of the LBIS should be on the province's future goals wrt to wood &amp; range products - instead it is reacting to and trying to mitigate a past catastrophic even. The focus is retrospective instead of prospective! Improving wood quality needs to be a stronger component, so does building healthier more resilient ecosystems, so does agro-forestry, NTFP and other opportunities, etc. In my opinion, the LBIS focus is something from the distant past that has been resurrected. It is not very forward thinking.</p>	<p>The treatments for midterm need to be broadened - pruning, agro-forestry, NTFP production, etc. as does where they are applicable. For example, fertilization in the IDF is forbidden - why? LBIS needs to support innovation and opportunity - it should not be so restrictive. Forest inventory? Isn't VRI for WLs pretty much dead? We are totally missing the opportunities presented by hardwood management.</p>	<p>Each area of BC is somewhat dependent on forests and most on range as well. Tunnel vision because of the MPB is wrong - the focus should be equally on the living forests as opposed to the dead forests. Pine is a pioneer species, beetles and fire are part of its ecology - accept that. Do what's needed to ensure decent stand return but don't look at these as being the best place to invest. LBIS should be more concerned about the state of the rest of the forests; i.e. area with old and soon to be sickly trees such as on UWRs, in OGMAs &amp; parks, etc. and what impact these areas will have on the working forests. The other area that needs some attention are the aspen forests. While they many not be considered that valuable in terms of merch wood, they are extremely important wrt water, habitat, ecosystems etc. Currently there are hugh areas of aging aspen (just like lodgepole pine before the MPB liquidated it) that we aren't paying any attention to. When it goes, the environmental/ecological impacts will be huge. Not trying to be an alarmist, just a realist. Also, clean up cut control which forces (incents) people to cut green trees to meet an admin requirement rather than retain them to help mitigate mid term timber supply issues.</p>	<p>The admin structure for LBIS, at least for Woodlot Licenses, is absurd. MFR, PWC, FBCWA, lead associations and licensee; i.e. 5 layers of administration to get dollars invested on the ground - it's ridiculous. Go results based - give the FBCWA the \$. It will deliver the program goals - and MFR (district staff) can check the work. Get Victoria MFR and PWC out of program delivery - creates inefficiency and increases overhead/admin costs.</p>
07-05-2010	Yes	<p>Completing incremental silvicultural activities that provide a reasonable return on investment. Linking the Land Based Investment Strategy (LBIS) to the local needs to Forest Management units. Using the LBIS to refocus how we look at timber supply (e.g., perhaps we need to incorporate value as well as volume).</p>	<p>Yes they appear adequate. I assume forest inventory to be very broad and cover things such as visual inventory, wildlife habitat inventory etc.</p>	<p>1) Ensuring a reasonable rate of return. 2) Meeting the needs of the local management unit.</p>	<p>1) Strategy needs to be developed collaboratively been Industry and Government. 2) Needs to be a clear linkage between strategy development and implementation. 3) Need sufficient resources to develop a meaningful strategy. 4) Strategy appear to be volume focused in the Interior. 5) Strategy should be done in conjunction with higher level management unit strategic plans. 6) Communication needs to be improved as to the goals and objectives of the strategy.</p>

07-05-2010	Yes	Restoration of damaged sites to ensure a healthy and vibrant natural forest in the future. The health of the forests should be first.	Treatments for midterm and tree improvement are areas that are unproven and therefor introduce risk. We need to focus on the others.	MPB is a good focus area considering the current impacts. Degraded sites from forest fires and other pathogens need to be considered as well as ecosystem health at watershed level	Biggest concern is that economic drivers seem to be the priority when the health of the forests is what really matters. Be careful of rash economic based decisions
07-05-2010	Yes	Both of the above, but maximizing timber value should also be a component of the first. We should not just produce fibre.	Fish Passage should be excluded. Pruning should be included.	Investments must be made throughout the province because the majority of the provincial timber supply will be coming from other parts of the province. There should be a higher proportion going to areas most significantly impacted by the MPB to reduce the impact of the MPB in these areas over the long term.	The strategy is OK, the process does not adequately address the needs of smaller licensees (woodlots). (1) There are limited opportunities for large fertilization, spacing, and backlog brushing projects because of the small block sizes generally found on woodlots. Larger blocks are mainly old BCTS blocks. To get larger projects, woodlots have to be lumped together, but they could be widely seperated geographically which does not improve efficiency. (2) Because LBIRs are not part of the process, FN info sharing is a huge undertaking for individual projects. One woodlot license can have up to 10+ FN to deal with (eg Cascades Forest District). If a project spans over a number of woodlots and each woodlot has some different FN, the info sharing process could be overwhelming, 20+ FN to deal with and as mentioned in (1) for smaller projects a large portion of the DA is used up just in the info sharing process. FN info sharing must be covered by a LBIR or be part of the project, not included as part of the Delivery Allowance. (3) The low DA does not cover the extra costs associated with woodlot associations having to gather information from 840+ woodlots, submitting the project proposals and only getting a select few approved. There are also extra costs associated with smaller projects and higher FN info sharing costs as indicated in (1) and (2) above. (4) Because all woodlot associations must be compensated for any of the work they do in proposing projects, the ones that get projects approved are ultimately using part of their DA to subsidize those that do not. In fairness to all woodlot associations, project proposal submission for woodlot associations should be a separate project.