

## **Sechelt Landscape Unit: draft legal objectives and OGMA selections**

Submission from  
Sunshine Coast Conservation Association  
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### **1.0 Introduction:**

The Sunshine Coast Conservation Association is pleased that the Sechelt landscape unit plan is nearing completion and progressing toward legal establishment. This plan will contribute to the protection of biological diversity, especially in rare old and mature lower elevation forests.

Overall, we are satisfied that the draft old growth management area (OGMA) selections for the Biodiversity Chapter for Sechelt Landscape Unit are important areas that were thoughtfully placed. We especially appreciate the consultation opportunities and the incorporation of local knowledge. Additionally, the overlap of OGMA with marbled murrelet nesting habitat has improved the quality of the plan.

The following sections will discuss specific draft OGMA's that we particularly support and areas that still need to be recognized in this plan. We want to clarify that because of the low BEO designation, and various policies intended to mitigate impact to the timber harvesting landbase (THLB), biodiversity for the Sechelt LU is not yet adequately protected. For example, some rare stands of age class 8 and 9 forest were not captured as OGMA. For this reason we have included a section identifying policy options that we hope will be used in the near future to secure a more effective degree of biodiversity protection.

Also of note: Terminal Forest Products is the major licensee for this landscape unit and has a total use plan for their operational areas. Their plan is a good example of a stakeholder initiative that protects important biological values and adds a significant layer of protection to the Sechelt Landscape Unit.

It should be noted in section 4.0, Significant Resource Values, that there is a federally mandated recovery team operating exclusively within the Sechelt LU. The Sakinaw Lake Sockeye Salmon Recovery Team is currently drafting a recovery plan that may affect harvesting opportunities and forest practices within the Sakinaw Lake watershed.

Finally, we would like to emphasize that logging is not the only economic benefit derived from forests in the Sechelt LU. Protection of biodiversity through effective landscape unit planning will maintain essential ecosystem functions, which in turn support long-term public interests in drinking water, tourism, botanical products, wild-crafting, fishing and a host of other values, as well as maintain sustainable harvesting opportunities.

Thank you for the opportunity to comment on the legal objectives and draft OGMA's for the Sechelt Landscape Unit.

## **2.0 Comments on specific OGMA selections:**

We strongly support retention of the following areas as OGMA:

OGMA #25 – between Ruby and Sakinaw Lakes – protects important fish habitat and provides connectivity.

OGMA # 8 – old forest that adds to the aggregate of the Ambrose Lake Ecological Reserve.

OGMA # 2 – within the Waugh Lake watershed. This selection supports protection of an important drinking water source. We would like to see more OGMA's established in old forest within this watershed.

OGMA # 87 – Skaiakos Point – a spectacular example of dry maritime coastal forest and important area for education, recreation and visual quality.

OGMA # 110, 111 – Triangle Lake – provides connectivity with the existing provincial park and protects the watershed of the Sargeant Bay wetland complex.

OGMA # 107 – Trout Lake – important for regional water supply, visual quality and recreation.

OGMA # 109 – protects veteran fir 'Big Tree' site.

OGMA # 106, 105 – protects important older forest in the CDF, adjacent to Smugglers Cove Provincial Marine Park.

OGMA # 104 – helps protect Homesite Creek, which is an important riparian area. We'd like to see this enlarged.

Various OGMA's on Nelson Island – important areas of rare age class 8 and 9 dry maritime coastal forest.

OGMA's that have been placed adjacent to other parks. These help to maintain interior forest conditions, connectivity and provide a buffer zone.

## **3.0 Areas that need to be included as OGMA**

The following areas should be included as OGMA but were not shown on the plan:

- a) District lots 5399 and 5400, comprising the proposed Ambrose Lake Ecological Reserve addition. International Forest Products (Interfor) has agreed to this addition to the reserve and removed the approved status of a block on these lots from their FDP. Please ensure that this area is classified as OGMA.
  
- b) North Nelson Island, partial age class 9, CWHdm (formerly Interfor Block 57). As this subzone is in severe old growth deficit<sup>1</sup>, it should be retained as OGMA. Interfor has given up their approval to log this area. Please classify this area as OGMA.
  
- c) Age class 9 polygons around Carlson Lake, #552 and 208. These polygons are in the CWH-vm2 subzone, which is not in old growth deficit.<sup>2</sup> However, these stands should be used instead of the recruitment OGMA that have been proposed.<sup>3</sup> Air photos and forest cover maps show that these polygons would provide excellent representation as OGMA.<sup>4</sup>

**4.0 Overall distribution of age and seral stages in the landscape, and implications of the low BEO designation.**

The Sechelt LU Plan contains the following table:

Age distribution of forests within the Sechelt LU<sup>5</sup>

Age	% of forested land base within the provincial forest
0-60	43%
61-140	48%
141-250	5%
251+	4%

As shown above, the amount of forest remaining in the old and mature categories equals 9%, which is the amount of forest necessary for old growth representation, and therefore all of this should be included in OGMA or protected by some other means.<sup>6</sup>

The Low Biodiversity Emphasis Option (BEO) chosen for the Sechelt LU puts biodiversity in this LU at a higher risk than an intermediate or high designation would have. Both the xm and dm CWH subzones have been drawn down to less than 3% old growth. As well, there is a very lopsided distribution of age classes, with the vast majority of the forested landscape in age classes 3 to 5. In short, there is an unnatural distribution of stand ages and a shortage of old growth.

<sup>1</sup> 2.6% old forest in the CWHdm, Ministry of Forests, Sechelt LU, Landscape Unit Summary, 2000

<sup>2</sup> Ministry of Forests, Sechelt LU, Landscape Unit Summary, 2000.

<sup>3</sup> Sechelt LU Plan, p.11

<sup>4</sup> based on forest cover data.

<sup>5</sup> Table 3, p.8 Sechelt LU plan.

<sup>6</sup> The provincial forest landbase does not include parks, which are appropriately included as OGMA in some cases.

Given this state of the landscape, we submit that the loss of any old stands or individual veteran stems is not acceptable. All veteran trees and age class 9 stands should be retained in the deficit subzones. As well, a policy of single stem removal and small patch logging would help in limiting risks to biodiversity. These measures are well within the capabilities of the licensees operating in this landscape unit.

It is now more important than ever that the provisions of the Integrated Wildlife Management Strategy (IWMS) be implemented. These measures involve establishing Wildlife Habitat Areas (WHA) that will help reduce risk to a variety of species and plant communities and help secure a certifiable, sustainable future for our economy.

### **5.0 Policy Issues and Discussion:**

Current policy directing creation of landscape unit plans allows category A logging approvals, and even expressions of interest from licensees, to preempt OGMA establishment regardless of the fact of an old growth inventory deficit. This policy is the main reason that landscape unit planning is unable to protect biodiversity in some areas where it is most desperately needed. Protection of biodiversity is everyone's responsibility, and over the long term, all stakeholders will benefit.

The need for coarse filter biodiversity protection through old growth retention was first articulated in government policy over ten years ago. Inventory information identifying deficit areas has also been widely available for many years. In 2004 there are no reasonable excuses for failing to protect rare old growth stands in deficit biogeoclimatic subzones.

The proper and reasonable procedure of first selecting age classes 8 and 9 for draft OGMA's in deficit areas, regardless of category A status, does not 'unduly restrict the supply of timber'. Development foresters working in this district have been aware of the deficit situation for a very long time and should be able to adjust without difficulty. Adequate protection of old growth is a prerequisite of accountability and sustainability. If the draft Sechelt LU is established as is, other approaches must be used to ensure that the public interest in old growth protection is achieved. These may involve the Stewardship Plan level and recourse to certification programs.

As previously noted, many of our concerns regarding old growth, riparian habitat, red-listed species and plant communities, etc., are being addressed by Terminal Forest Products in their Sechelt operating areas. We hope that government will support voluntary efforts by licensees to maintain these important biological resources. Government could, for example, formally establish TFP's Total Use Plan as a higher level plan.

### **6.0 Summary and Recommendations**

The Sechelt LU plan protects important areas of old and mature forest. The SCCA is extremely pleased that the process is nearing completion. Areas of age class 8 and 9 not captured in OGMA are critical for biodiversity at the landscape level and need to be protected through use of other legal instruments such as WHA, park or ecological reserve establishment. In the interim, we ask that government and industry help to protect irreplaceable age class 8 and 9 stands across the landscape by avoiding activity and using harvesting methods that maintain forest structure and function.

We look forward to the next phase of planning involving Stewardship Plans and WHA establishment.

Our sincere thanks and gratitude to all those who have worked on the Sechelt LU plan and shared information with us. We especially appreciate the high degree of consideration for community input.

### **Recommendations**

- 1.* Amend the draft OGMA selections for the Sechelt LU to capture the age class nine stand in CWHdm on Nelson Island (formerly Interfor Block 57) and adjacent to Ambrose Lake Ecological Reserve (district lots 5399 and 5400).
- 2.* Ensure areas of critical habitat for marbled murrelet, amphibians and other species at risk, as well as Conservation Data Centre red-listed plant communities, are mapped and legally protected as soon as possible.
- 3.* We request that all licensees and district staff of the Ministry of Forests refrain from pursuing development in areas that are necessary for the protection of species at risk pending formal resolution of these issues through stewardship planning and WHA establishment.