

## **Sunshine Coast Conservation Association**

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**Larry Pedersen**, Chief Forester  
4th Fl, 595 Pandora Ave,  
Victoria, BC, V8W 9C3

August 13, 2001

### **Re/ Sunshine Coast Timber Supply Review, public comments**

Dear Sir;

The Sunshine Coast Conservation Association is an umbrella organization of 17 conservation and environmental advocacy groups working on the Sunshine Coast. The combined membership of the SCCA and its member groups numbers about 3,000 people on the lower Sunshine Coast. Please find attached our response to TSR II.

Over the last five years members of our organization have grown increasingly alarmed at the very low standard of forest resource stewardship that prevails in forest development planning at the district level. By way of explanation please consider the following circumstances:

- Of the 420 Category "A" cutblocks in Interfor's various FDPs for the forest district 180 have unresolved habitat conflicts that have been extensively documented by the Fish & Wildlife Habitat Protection Branch.
- Approximately 30% of Interfor's Category "A" cutblocks in the SCFD are in areas classified in the last TSR as non-contributing and/or inoperable. In most of these blocks approvals were granted despite the prior identification of these areas as critical for at-risk species (primarily Marbled Murrelet nesting habitat and Mountain Goat Winter Range).
- Of 256 Category "A" cutblocks in the 3 FDPs of the Sechelt supply block, 54 are in biogeoclimatic subzones that have extreme old growth deficits including 6 in BEC units that have less than 3% representation.
- On October 15, 1998 all "known" status Ungulate Winter Range (ie recognized by the District Manager) disappeared from the forest district. Since then, previously "known" GWR has been fragmented by recent logging and Category A approvals.
- During the last 6 years there have been no Wildlife Habitat Areas established in the SCFD while recent logging and new Category "A" proposals have been allowed to fragment 66% of the candidate WHAs.
- Four major complaints have been filed with the Forest Practices Board since 1997. The reports from these complaints have, in general, been highly critical of the behavior of the Ministry of Forests.

What will be the effect of an increased Annual Allowable Cut on the critical non-timber resources of the SCFD? Has the TSR process fully briefed the public on the implications of attempts to maintain the current AAC? Has the public ever been frankly informed about the consequences of, for example, downgrading Visual Quality Objectives? There were no public meetings on the lower Sunshine Coast to present timber supply options. We ask the Chief Forester to bear in mind these circumstances and questions while considering our submission. Thank you very much.

Yours truly,

Daniel Bouman  
Executive Director, SCCA