



Sunshine Coast
Conservation
Association

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Sunshine Coast Forest Stewardship Plan
c/o International Forest Products Limited
#311 1180 Ironwood Road
Campbell River, BC V9W 5P7

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Attention: Tania Pollock

SCCA comments for Interfor's SC FSP public review:

The Sunshine Coast Conservation Association is an umbrella organization of environmental and conservation advocacy groups working within the SC Forest District. As you are no doubt aware, our concerns with Interfor's activities have been expressed repeatedly through Forest Development Plan reviews and also in a variety of other venues.

Please accept this letter as our notice of interest in Interfor's activities in the following Forest Development Units (landscape units); Homathko, Southgate, Bishope, Bute East, Bute West, Brem, Quatum, Cortes, Homfray, Skwawka, Deserted, Brittain, Jervis, Narrows, Salmon, Chapman and Sechelt.

Please notify us of any planned activity in these units that involve;

- harvesting of old growth in biogeoclimatic sub-zones known to be in deficit condition (less old growth inventory than is required to meet assigned targets for Landscape Unit planning),
- changes to established Old Growth Management Areas or Wildlife Habitat Areas that are intended to accommodate harvesting or road building,
- draft Ungulate Winter Ranges (including any proposed for Deer) in either the contributing or noncontributing timber harvesting land base,
- old growth harvesting in age class 8 and 9 stands that have or may have attributes of Marbled Murrelet nesting habitat in either the contributing or noncontributing timber harvesting land base,

- harvesting in any low elevation settings that have or may have significance for Grizzly Bear survival,
- harvesting in Community Watersheds or watersheds designated (under *Section 16 of the Land Act*) as *Watershed Reserve*.

Please also accept the following comments as part of the written record of response to the public review of Interfor's SC Forest Stewardship Plan.

Watersheds.

We appreciate that Interfor has stated as a strategy/result for management of the Chapman and Gray Watershed Reserves that no road building or harvesting will occur. Considering that Interfor is the current chart holder in the general area of these Reserves, your strategy/result is entirely appropriate and consistent with the Joint Watershed Management Agreement of the Sunshine Coast Regional District and the Sechelt Indian Government.

Existing Licensee Obligations.

We note that this FSP is primarily a list of obligations that any licensee is already legally required to comply with. The list includes the "objectives set by government" in Landscape Unit Plans and the Non-Spatial Old Growth Order as well as obligatory objectives from FRPA sections 149 and 181 and obligations contained within the Forest Planning and Practices Regulations (FPPR). In summary, there are very few obligations undertaken in this plan that are not already established in law.

Other Licensee Obligations.

There are a wide range of "goals and objectives" set by government that are not referred to in this FSP. Goals and objectives are established by government for all ministries and agencies of the provincial government. For example, the service plan for the Ministry of Agriculture and Lands contains goals and objectives for the Integrated Land Management Bureau and the Species-at-Risk Coordination Office. The service plan notes that reviews of the Old Growth Management Area order and the Identified Wildlife Management Strategy are underway and may be amended to accommodate the needs of several species, including the Marbled Murrelet. This FSP does not commit Interfor to cooperation with provincial government goals and objectives related to adequate management and conservation of species-at-risk.

It should be noted that Interfor also has obligations under a variety of federal statutes. For example, the Marbled Murrelet is protected under the Migratory Birds Convention Act and is listed as a *Threatened* species under the Species-at-Risk Act. It is an offense to disturb the residence of this species. Compliance with federal statute is not addressed in this Plan.

Outstanding Old Growth and Wildlife Issues.

We note that Interfor has not completed Landscape Unit Plans for the Jervis, Narrows and Salmon landscapes and has not signed off on the draft SCFD Mountain Goat Winter Range Plan. We also note that Interfor has expended considerable public funding on murrelet nesting habitat reconnaissance but has refused to release this information to the public. It is not apparent in the FSP that Interfor intends to manage resources in a manner that would allow for future resolution of outstanding old growth and wildlife issues. A reasonable person could conclude that Interfor has an interest in obstructing the goals and objectives of both provincial and federal agencies. In any case, the FSP does not provide verifiable strategies or measurable results that are realistically adequate to address pressing wildlife issues. Is it Interfor's position that the needs of species-at-risk are not of operational concern to the company or its registered forest professionals?

We also note that Interfor's previous SCFD FDPs contain a large percentage (~35%) of category "A" cut block approvals in the non-contributing timber harvesting land base. Many of these approvals are in already documented murrelet nesting habitat. It is readily apparent, for example, that in the Skwawka LU, Interfor's category A approvals will, if logged, entirely prevent any effective conservation efforts for this species in this landscape. Many of Interfor's category A approvals in the Jervis LU are also heavily in conflict with murrelet nesting habitat and Goat Winter Ranges. Given Interfor's history of aggressive development of logging proposals in wildlife conflicted areas (in both the contributing and non-contributing land bases) we are deeply concerned about the possibility of Interfor being able to operate free of government agency oversight under this minimalistic and vague FSP.

Final Comments.

We believe that forestry is a critically important activity for Sunshine Coast communities and must be undertaken in a highly responsible and accountable manner if a sustainable future is to be created. Interfor's guide to the Forest Stewardship Plan and use of the Sustainable Forestry Initiative and ISO 14001 logos create a public expectation of sustainable, accountable operations. Having cultivated this expectation, we assert that Interfor is obligated to provide scientifically justifiable management and conservation for non-timber values in the areas under its management. The actual content of this FSP does not achieve this purpose. We are concerned that Interfor's FSP appears to set standards below those established under higher levels of law. As well, it is our view that this FSP does not meet the minimum requirements of the Forest and Range Practices Act.

As always, we remain committed to working with Interfor and all stakeholders to achieve environmental sustainability for the Sunshine Coast Forest District.

Daniel Bouman, Executive Director, SCCA