



Sunshine Coast
Conservation
Association

March 18, 2022

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RE: BCTS 2022-2026 OPERATING PLANS

Dear Shawn:

Thank you for inviting the Sunshine Coast Conservation Association to comment on BCTS' 2022-2026 Operating Plans.

The Sunshine Coast Conservation Association (SCCA) is BC non-profit Society and a federal charity. Our mission is to protect the biodiversity of the Sunshine Coast region for the benefit of humanity and all life in the Sunshine Coast Natural Resource District (SCNRD), the territories of the Sk̓wx̓wú7mesh, shíshálh, Tla'amin, Klahoose and Homalko First Nations. We pursue our mission through research, mapping, scientific, legal, and strategic analysis, government relations, alliance and capacity building, education, and outreach. We engage with First Nations and all levels of government, civic organizations, industry, and the public, and utilize a variety of legislative tools to achieve our goals.

We have several questions, concerns, and requests about the 2022-2026 Operating Plans and processes which we have addressed in our submission below.

BCTS Mandate

For generations forestry was a cornerstone of our provincial and regional economies. However chronic overlogging for the last 150 years¹ has left us with a dwindling resource.² Forestry used to account for up to 150,000 jobs and generated billions for the BC economy. Now, the sector costs an average of \$365 million per year³ and accounts for only 2% of BC jobs.⁴

¹ <https://drive.google.com/file/d/1TZKQdh8N0emeCWBsR0wbt1LNFos-APIJ/view?usp=sharing>

² <https://globalnews.ca/news/7354867/bc-forestry-watchdog-forest-regeneration/>

³ <https://www.focusonvictoria.ca/forests/forestry-doesnt-pay-the-bills-folks-r24/>

⁴ https://www2.gov.bc.ca/assets/gov/data/statistics/employment-labour-market/lfs_employment_by_industry.xls

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As ‘the government’s forestry company,’ BC Timber Sales (BCTS) is responsible for managing about 20% of the province’s allowable annual cut (AAC) through auction of Crown timber licences. BCTS’ mandate is “to be an effective timber marketer generating wealth through sustainable resource management” and “to market Crown timber to establish market price and capture the value of the asset for the public.”⁵

To meet its mission, BCTS has four goals. These include 1.) Provide a credible reference point for costs and pricing of timber harvested from public land in BC; 2.) Optimize net revenue to the province, within the parameters dictated by its benchmarking mandate and safe and sound forest management practices; 3.) Provide opportunities for customers to purchase timber in an open and competitive market. Its objectives include ensuring its data are complete, accurate, reliable, and verifiable; containing costs and maximizing auction bids within the parameters dictated by its benchmarking mandate and sound forest practices; demonstrating sound forest management practices; and developing sufficient timber to optimize timber volume.

BCTS is meant to collect data through operations to determine the market value of timber harvested on public land to ensure British Columbians receive fair value from our timber resources. With respect, we don’t know if BCTS data are complete, accurate, reliable, or verifiable because we don’t have access to BCTS data and reports. From our experience with FLNRO, we don’t assume the quality and completeness of BCTS data.

From what we can determine through reviewing the 2022-2026 Operating Plans it’s apparent that BCTS isn’t considering data, and analysis to account for cost/benefits of deforestation or long-term impacts of climate change induced drought, flooding and fire, loss of carbon sequestration and storage and downstream impacts on the land base and communities.

The land base is still not being managed for long enough intervals (nor diverse enough values) to ensure a sustainable timber supply. Consequently, it’s not possible for BCTS to generate accurate data to determine a true fair market value for the timber. The old system we have been operating under is clearly not working. We are in urgent climate and biodiversity crises and we need BCTS to lead the way to real change. Real change means advocating to lower the cut, more restoration, and a shift to truly sustainable forest practices that account for all the values our forests sustain.

The Paradigm Shift

On June 1, 2021, the Province released an intention paper for ‘a new vision for sustainable forest policy in BC’. The paper, “Modernizing Forest Policy in British Columbia Setting the Intention and Leading the Forest Sector Transition”⁶ explains how government policy has not evolved quickly enough to adapt to the impacts of climate change on our forests. It promises an imminent shift away from a commodity-based forest sector to a more holistic management system and changes to forest policy to “address the rapid decline of available timber in BC.”⁷ Yet nearly a year later, we aren’t seeing these needed changes reflected in the 2022-2026 Operating Plans.

⁵ BC Timber Sales CURRENT MANDATE STATEMENTS https://www.for.gov.bc.ca/hfd/library/documents/bib98260_Mandate_Statements.pdf

⁶ https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/competitive-forest-industry/modernizing_forestry_in_bc_report.pdf

⁷ https://archive.news.gov.bc.ca/releases/news_releases_2020-2024/2021PREM0037-001060.htm

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Cumulative Effects

The [Forest & Range Practices Act \(FRPA\)](#)⁸ is supposed to ensure protection and sustainable management of everything in and on BC Crown forests. FRPA outlines how all forestry activities must be conducted to manage and multiple values under the Act. The values to be protected include Biodiversity, Cultural Heritage, Fish Riparian, Fish, Watersheds, Forage and Associated Plant Communities, Recreation, Soils, Timber, Visual Quality, Water Quality and Wildlife.

The Province is currently undertaking Cumulative Effects Assessments in the SC-TSA and the results show very plainly that our forests are in trouble. Yet, it doesn't appear that the analysis emerging from CEA work has made it into BCTS plans.⁹ It is also not evident if or how operating plans have considered the principle of the Forest Landscape Planning Pilot Project, if or how BCTS is integrating FLP concepts its operating plans.

We would like more information on how BCTS is receiving and integrating this information into its planning. As well, we ask that for each of its proposed cut blocks, BCTS undertake and make public CEF and cost benefit analyses to indicate the true value of the timber to be extracted against the value of the intact forest for the 11 values FRPA requires BCTS to manage for.

Climate Change

The BC forestry sector is our provinces single largest carbon emitter.¹⁰ This is a direct consequence of the overlogging¹¹ of BC forests to the point that new stands can't regenerate fast enough to sequester and store carbon *and* provide a sustainable supply.¹²

In 2019, the Province completed a Preliminary Strategic Climate Risk Assessment for BC¹³. The assessment evaluated 15 climate risk events that *could* occur in BC along with their health, social, economic, and environmental consequences. Some of the greatest risks identified were severe wildfire season, seasonal and long-term water shortages, and severe river flooding. All of which are directly linked to forest management practices.

Three years later, these are no longer predictions or models. These events are playing out in real time with frightening consequences. Last summer, British Columbia suffered devastating fires and a deadly heat dome. Billions of marine animals baked on the foreshore. Lytton burned in the blink of an eye. Emergency response systems floundered as elders died from the heat. On the Sunshine Coast we experienced crippling drinking water shortages.

Through the fall, extreme rains, flooding, and landslides blocked and carved up every major highway connecting the Lower Mainland to the rest of the country. Cut off communities from major roads on the coast. UBCIC declared a climate emergency. BC declared a provincial state of

⁸ [Forest & Range Practices Act \(FRPA\)](#)

⁹ <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework/regional-assessments/south-coast/howe-sound-cumulative-effects-project>

¹⁰ https://www2.gov.bc.ca/assets/gov/environment/climate-change/data/provincialinventory/2018/bc_provincial_ghg_inventory_1990-2018.xlsx

¹¹ <https://www.focusonvictoria.ca/forests/26/>

¹² <https://sierraclub.bc.ca/7-myths-about-forests-carbon-and-climate-change/>

¹³ <https://www2.gov.bc.ca/gov/content/environment/climate-change/adaptation/risk-assessment>

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emergency. Canadian armed forces were deployed for disaster relief. The Prime Minister and Premier announced a joint committee on climate change disaster response. On the Sunshine Coast streams blew their banks, culverts flew away downstream, and roads caved in with devastating impacts on homes and livelihoods, engineered and natural infrastructure and natural values.

Last year alone in BC climate change forced tens of thousands of people from their homes. Hundreds of people and millions of animals died from fire, slides, and floods. The financial cost of the flooding events alone could exceed \$9 billion and many of these losses and costs can be directly linked back to deforestation, clear cut logging, and the long-term mismanagement of BC's forested land base.

We ask that for each of its proposed cut blocks, BCTS undertake and make public climate modeling and mitigation plans, and cost benefit analyses to determine the timber value of the proposed block against the cost of climate impacts, forest carbon sequestration and storage.

Old Growth & Mountain Hemlock Zone

The value of our forests for biodiversity protection, natural asset management, carbon sequestration and climate change mitigation is immeasurable. With less than 3% of productive old growth ecosystems left in BC, protecting these last remaining ecosystems is an emergency. This emergency is compounded by the climate crisis and global biodiversity tipping points.

The Merkel-Gorley 2020 Old Growth Strategic Review¹⁴, the Price, Daust, Holt report, "A Last Stand for Biodiversity"¹⁵ and the 2021 Intact Forests – Safe Communities report by Peter Woods¹⁶ point directly to the urgent need for the immediate paradigm shift in BC forest management. In September 2020, Premier Horgan committed to implement all the 2020 Old Growth Strategic Panel's recommendations.

We recognize and appreciate the Old Growth deferrals noted in the 2022-2026 OP maps and the fact that none of the proposed cutblocks in the plans are over 250 years old. The apparent reason for this however is somewhat shocking. Of the 118 proposed cut blocks in this proposal only 11 are over 100 years old and at least 5 are as young as 41 years old. Reviewing age class maps for the SCNRD it appears the main reason BCTS is not logging Old Growth is the SCNRD is because over 90% of the forested land base is under 100 years old.

What's left of the true Old Growth in the SCNRD is primarily in the Mountain Hemlock Zone¹⁷. The Mountain Hemlock Zone is very slow growing, it is extremely vulnerable to logging and critically important for carbon storage in fibre and soils.¹⁸ Given where we are at with the state of climate change, once logged, MH ecosystems will never recover. In fact, logging in the MH zones is forest mining. Accordingly, the SCCA is totally opposed to all logging in the MH zone.

¹⁴ <https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/strategic-review-20200430.pdf>

¹⁵ <https://sierraclub.bc.ca/wp-content/uploads/bcs-old-growth-forest-a-last-stand-for-biodiversity-report-2020.pdf>

¹⁶ <https://sierraclub.bc.ca/intact-forests-safe-communities-sierra-club-bc-report/>

¹⁷ https://www.for.gov.bc.ca/hre/becweb/downloads/downloads_zonereports/mountain_hemlock_zone_report.pdf

¹⁸ Silvicultural Analysis of the Subalpine Mountain Hemlock Forest (1992) by K. Klinka, R.E. Carter, G.F. Weetman, and M. Jull

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Minimum Harvest Age

Planning to harvest 40-year-old stands is the result of an unsustainable and outdated forestry paradigm, that doesn't support development of sufficient timber to *optimize* timber values. This is not sustainable forestry, it is deforestation.¹⁹ Road building and maintenance fossil fuels burned, soil disturbance, wood waste and released carbon coupled with lost potential value of fibre, carbon sequestration and storage, wildlife habitat and ecosystem services collectively represent a massive ongoing net loss for our forests, ecosystems, and communities.

Clearly, we have crossed the threshold where the forests in the SC-TSA cannot regenerate fast enough to maintain a 'sustainable yield' within the BC Ministry of FLNRO's status quo management assumptions, practices, and volumes.²⁰ Clearly, change must happen now. Accordingly, the following five cut blocks should not be considered for auction.

TA0981	MCNR002	McNair_Rainy	2026	2020	Planned	19.2	5,900	41-60	Fd68Hw17Dr15	Y
TA0714	LOIS019	Lois South	2026	New	Planned	4.2	1,500	41-60	Fd47Hw27Cw27	Y
TA0523	F089C47W	Lois South	2026	2016	Planned	29.3	10,000	41-60	Fd42Hw38Cw15Dr5	Y
TA0527	LOIS010	Lois South	2025	2021	Planned	12.3	7,000	41-60	Fd80Hw10Cw10	Y
TA0539	F099C421	Dodd	2026	2021	Planned	41.5	26,000	41-60	Fd50Hw40Cw10	Y

Viewscapes, Parks and Recreation

The BC government promises to ensure scenic quality expectations of the public, tourism, recreation and other sectors are met through Visual Quality Objectives. Tourism is one of BC's fastest growing industries with over 19,000 tourism businesses employing over 300,000 workers and its projected that 106,000 new job openings will be available in tourism by 2028. Tourism also has increased value for small towns across British Columbia because most tourism businesses are locally owned, small to medium ventures that contribute directly to local economies.²¹

While the forestry sector gains economic value through timber extraction, all of the other sectors generate economic value from the forest through non-extractive practices and experiences. And they all support one another. Economic value generated by Tourism and Recreation is directly linked to and dependent on values such as Cultural Heritage, Fish, Forage and Associated Plant Communities, Visual Quality, Water Quality and Wildlife in and around BC forests. When views, recreation and tourism values are lost through extraction, all of these other values suffer.

In a province that boasts over 15% terrestrial protection, just over 3% of the Sunshine Coast TSA is protected. The Sunshine Coast in essence is being robbed of the chance to develop, enhance and capitalize on a crucial and sustainable economic driver provided by intact forests.

¹⁹ <https://www.nationalgeographic.com/environment/article/deforestation>

²⁰ <https://sierraclub.bc.ca/7-myths-about-forests-carbon-and-climate-change/>

²¹ <https://www2.gov.bc.ca/gov/content/tourism-immigration/tourism-resources/value-of-tourism>

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Watershed Security

BC has a suite of legislative and policy tools for watershed planning which are meant to protect drinking water including Drinking Water Protection Plans, Water Sustainability Plans, revitalized land use planning frameworks including Cumulative Effects Assessments and now the Forest Landscape Planning Pilot Project.

2020 mandate letters of the Ministry of Environment and Climate Change, Ministry of Forest Lands and Natural Resources Operations (FLNRO) and Ministry of Agriculture contain overlapping watershed protection mandates. Last fall local governments on the Coast, First Nations and NGO partners rallied together to seek “immediate, coordinated action” to achieve formal protection of West Howe Sound Watershed aquifer recharge areas.²²

On January 25, 2022, the BC Government announced the BC Government has announced it is developing B.C.’s first Watershed Security Strategy and Fund, in collaboration with Indigenous Peoples and other levels of government. The Strategy will align with government commitments, including development of coastal and wild salmon strategies, work on drinking water, modernized land-use planning, and the Climate Preparedness and Adaptation Strategy. A month later it announced the creation of a new Water, Lands and Resource Stewardship Ministry which will oversee the creation and implementation of the watershed strategy and fund. The SCCA is thrilled very pleased to see this important government initiative move forward.

We ask that BCTS acknowledge this critical work by taking a step back and removing any cutblocks within Community Watersheds and Aquifer Recharge Areas from its operating plans while the new ministry and watershed security strategy take shape.

*Community Watersheds*²³

Community Watersheds are defined under the *Forest & Range Practices Act* (FRPA) as “all or part of the drainage area that is upslope of the lowest point from which water is diverted for human consumption by a licensed waterworks. Community Watersheds are designated under the Government Actions Regulation (GAR) to protect the water that is diverted for human consumption to conserve the quality, quantity and timing of water flow and prevent cumulative hydrological effects having a material adverse effect on water. As the BC forestry paradigm shifts, and watershed security planning comes into effect, we believe Community Watersheds should be a primary focus for conservation and restoration.

Gibsons/SCRD aquifer recharge areas and DL 1313

Protection of the Elphinstone/Gibsons West Howe Sound Aquifer Recharge Areas is paramount to ensuring a sustainable water supply system for the Sunshine Coast. Accordingly, the SCCA is strongly opposed to the sale and logging of proposed blocks in the Gibsons/SCRD Aquifer Recharge Area. We believe that the following blocks should be removed from the Crown Forest and not considered for future harvesting:

²² <https://www.youtube.com/watch?v=bZTOtUIETwY&t=4818s>

²³ <https://www2.gov.bc.ca/gov/content/environment/air-land-water/water/water-quality/community-watersheds>

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TA0519 G043B4N, TA0519/G043B4NV, G043B4P8/TA0521, TA0048/G043B4PE, TA0048/G043C3ZH, G043B4P2, TSL TA0048 block Elph006, TA1720 Blocks Elph002 and Elph003 and DISTRICT LOT 1313 “Area of Enhanced Public Engagement.”

The forested ecosystem on the southeast slopes of Mount Elphinstone is the main Recharge Area for two prolific drinking water aquifers (552²⁴ and 560²⁵). These aquifers yield large volumes of high-quality potable water that will make up more than half of the SCRD’s anticipated water deficit for the next 50 years.²⁶

The Recharge Area plays an integral role in moderating these aquifer systems by providing landcover which absorbs and releases water, slowing the release of snow melt, supporting soil structure and slope stability, mitigating against both drought and floods. Removal of the forest cover by clear cut logging in the Aquifer Recharge Area could dramatically disrupt the recharge process, result in less water entering the system, increase erosion, turbidity, slope instability and landslides.

The SCCA, Town of Gibsons and Sunshine Coast regional District with encouragement from the Squamish Nation, are pursuing measures to protect the recharge areas lands from further resource extraction. Moving forward we ask that BCTS remove all blocks within the recharge areas from its operating plans, undertake to formally map and identify the recharge areas in its logging plans and produce for review all hydrogeological and geotechnical reports associated with proposed blocks in the drinking water aquifer recharge areas from now on.

Specifically, regarding DL 1313, this 48-hectare parcel was added to BCTS Operating Plans in 2013 without public consultation. This decision has been controversial and the SCRD has been working to have this lot removed from logging plans ever since. The area has experienced ongoing flooding problems, including washouts in 2014, 2018 and 2021 which appear to have been caused by logging on the adjacent DL 1312.

The SCCA is working directly with citizens and community groups, the SCRD and Town of Gibsons and engaging the Squamish Nation (SN) to determine the best approach to remove these lands from BCTS TSA. With direction from our MLA Minister Simons, the SCRD has now sent a formal referral to the Squamish Nation seeking its support for an land use designation change.

It was disappointing to see that the BCTS “Engagement Plan for Proposed BC Timber Sales Licences in the South Elphinstone area Updated January 17, 2022” lacks any history, context or recognition of the long-term effort made by so many parties to protect these lands. Especially given that BCTS has been encouraging the SCRD to seek a land use designation change for this block for years. We were also disappointed that BCTS apparently deems the public consultation process for this block to be complete when many of the neighbours were not consulted at all.

²⁴ <https://apps.nrs.gov.bc.ca/gwells/aquifers/552>

²⁵ <https://apps.nrs.gov.bc.ca/gwells/aquifers/560>

²⁶ [https://www.scrd.ca/files/File/Infrastructure/Water/2019-Jan-15%20SCRD%20Groundwater%20Investigation%20Phase%202%20Results%20FINAL%20\(PART%201\).pdf](https://www.scrd.ca/files/File/Infrastructure/Water/2019-Jan-15%20SCRD%20Groundwater%20Investigation%20Phase%202%20Results%20FINAL%20(PART%201).pdf)

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We note that stakeholders have been requesting updated hydrogeological reports to address our main concerns re: impacts of the aquifer recharge areas and natural assets but these reports have not yet been released. We ask that once these reports are complete, they will be routinely and immediately released to the stakeholders.

Other impacts from proposed logging on Mt. Elphinstone which concern us include:

- Cumulative effects of deforestation on multiple ecological resources including old growth recruitment, wildlife habitat, fish bearing streams and overall biodiversity.
- Imminent risks from downstream impacts on private property, roads, and other infrastructure for the SCRDP and the Town of Gibsons and BC government.
- Loss of the scenic backdrop to the Town of Gibsons, Gateway to the Sunshine Coast and impacts on recreation and tourism.
- Other socio-cultural impacts including the enduring ‘war in the woods’ on the Sunshine Coast as Mt. Elphinstone continues to be an ongoing flashpoint for activism and conflict.

McNair / Rainy OP

We remain concerned about multiple ecological and natural asset management impacts and cumulative effects of logging on proposed blocks in the Dakota and McNair Community Watersheds. This includes compounding impacts from logging too young forests, impacts on adjacent parks, old growth forests, marbled murrelet habitat, fisheries, increased downstream impacts and cumulative effects in the Howe Sound marine environment and drinking water.

Dakota Creek Community Watershedⁱ

We remain concerned about potential impacts on fish from large cut blocks proposed in the Dakota Creek watershed. We are concerned about blocks A92904 G053C42W, A92904 G053C42X and A92904 G053C42V in the Dakota Creek watershed.

Dakota Creek empties into Howe Sound just south of the pulp mill site at Port Mellon. We consider this relatively small creek to be regionally significant because of its historic capacity to produce large numbers of Cutthroat and Steelhead Trout. There is a high degree of conservation concern for anadromous (sea-run) Cutthroat stocks in the Lower Mainland Region as these have been in steady decline for many years.¹

The Creek has historically supported runs of Coho, Chum, Rainbow, Cutthroat and Steelhead. A 1979 study found that Dakota Creek was one of five key Georgia Basin streams accounting for 61% of Cutthroat production in the Lower Mainland region. A 2005 Cutthroat recovery discussion paper also notes the significance of Dakota Creek. The first Coastal Watershed Assessment Procedure (CWAP) was conducted in 1995 and the second CWAP identified much of the terrain as naturally unstable. Over the past 40 years, human-caused slope failures have caused sediment loading in Dakota Creek. The Dakota estuary and lower reaches are considered to have high fisheries values. Also of note is that Dakota Creek is one of several creeks between Langdale and Port Mellon that are significant for Cutthroat Trout. These include Avalon, McNair, Oulette, and Twin creeks.

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McNair Creek Community Watershed

As with Dakota we believe that the McNair Community Watershed should be a primary focus for restoration efforts and protection to conserve the quality, quantity and timing of water flow and prevent cumulative hydrological effects having a material adverse effect on water supply and fish.

Nearly all the forest outside of the conserved areas in the TSA is younger forest.ⁱⁱ Of concern are three large blocks on the eastern edge of Tetrahedron Provincial Park in the Atl'ka7tsem Howe Sound Biosphere Reserve buffer zone: TA0528 RAIN005, TA0528 G053C4J5 and TA0528 RAIN004. These blocks would be highly visible from the Tetrahedron Provincial Park. FLNRO is currently undertaking a (10 year) review of the Visual Quality Objective in the SCNRD. The SCCA is working with multiple stakeholders and local governments to ensure that critical view areas are protected through this process. Views from the Park should be preserved.

Brittain West OP

We remain concerned about logging of blocks TA1776BRITW, TA10070 K010B473, TA1070 K010B471 and TA1070 K010B46X and potential impacts on the Britain River.

This watershed was logged extensively in the 1930's and suffered a severe forest fire in 1951. Much of the spawning gravel was lost; the water was considered unstable, and a bad run-off was noted in 1961. In 1994, the terrain was mapped with evaluations of slope stability and hazard potential to aid in the development of forestry in the upper reaches of the watershed. Another report that year noted the logging related impacts to fish habitat and the requirement for remedial wildlife works and riparian improvements.

According to the Sechelt Land Use Plan (Draft 2007), all the Brittain River watershed is considered to have an extremely high cultural and spiritual value; and the key management issue is rehabilitation of fisheries values.

Records (1983-2000) show that the maximum annual escapement for Coho was 1,100; the pink maximum (1989-1998) was 2,500 and the Chum 1,500 (1990-2000). A Preliminary Anadromous Salmonid Assessment (2008) conducted in the lower two reaches assessed those habitats as poor with opportunities for remedial work. In addition, there are observations recorded for Dolly Varden, Rainbow Trout, Cutthroat Trout and Steelhead. As of 2004, the winter run for steelhead was evaluated as an extreme conservation concern. In 2009, the river was nonetheless considered to be one of the major systems for Pinks and one of 36 Chum spawning streams identified within the Jervis Inlet Management Area, Statistical Area 16.

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Bunster OP

We are sad to see four (more) large cutblocks proposed on the Malaspina Peninsula along the Sunshine Coast Trail on the edge of Malaspina Provincial Park²⁷. The cutblocks along the peninsula have already so negatively affected the viewscape and ambiance of this potentially world class trail. I haven't had time to investigate the ecological values and the BEC zones etc. I will come back to this and reach out to SCREDO and Sunshine Coast Tourism and comment further. For now, I will simply comment that we have strong concerns around the following blocks: TA0034 K007C4JF, TA0034 K007C4JG, TA0034 K007C4JK and TA0034 K007C4JL.

Thank you again for the opportunity to comment on these 2022-2026 Operating Plans. SCCA will keep going through these operating plans and let you know if we have any more questions or concerns. We look forward to hearing back from you regarding the questions posed and requests we made in this submission. We appreciate your time and consideration of our concerns and look forward to ongoing engagement with you.

Kind Regards,

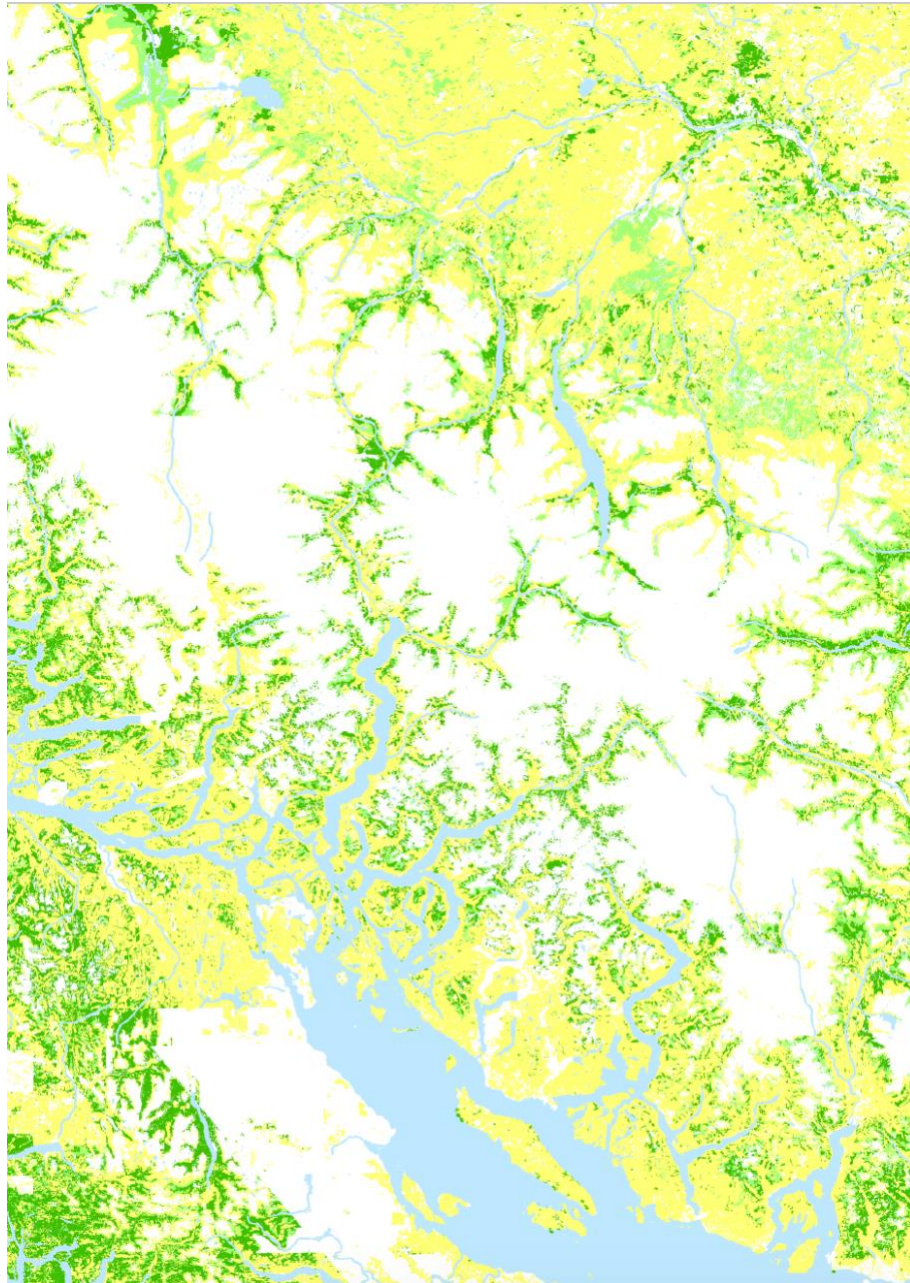
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²⁷ https://www.bcparks.ca/planning/mgmtplns/malaspina/malaspina_mp_final.pdf

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- Approved Entire Cutblock Boundaries Overlapping Old-Growth Forest from Apr30, 2020 to Apr26, 2021
- Approved Cutblock Portions Overlapping Old-Growth Forest from April 30, 2020 to April 26, 2021
- Approved Entire Cutblock Boundaries Overlapping Old-Growth Forest from Apr30, 2019 to Apr29, 2020
- Approved Cutblock Portions Overlapping Old-Growth Forest from April 30, 2019 to April 29, 2020
- Mid and High Productivity Old Growth Forest in BC with Site Index above 10 (darker green colour)
- Low Productivity Old Growth Forest in BC with Site Index below 10 (light green colour)
- Layer
 - Younger and Other Forestlands (pale yellow colour)
 - Water (light blue colour)
 - Non-Forested and No Data Areas (white colour)