



February 25, 2022

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RE: SUNSHINE COAST TIMBER SUPPLY AREA (TSA) TIMBER SUPPLY REVIEW (TSR) – DATA PACKAGE REVIEW AND COMMENT

Dear Adam:

Thank you for inviting the Sunshine Coast Conservation Association to comment on the 2021/2022 Sunshine Coast Timber Supply Area Timber Supply Review Data Package.

The Sunshine Coast Conservation Association (SCCA) is a 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 Skwxwú7mesh, 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.

The SCCA has several concerns about the TSR Data Package and the review process which we address below. As we see it, the TSR Data Package is based on outdated, incomplete information and antiquated management assumptions and practices, which cannot support an informed determination of the Annual Allowable Cut (AAC) by the Chief Forester. In our view, FLNRO has not adequately recognized or addressed the current realities of the state of the Crown Forest Land Base and has disregarded the urgent need for immediate changes in forestry practices in favour of a status quo approach. Until these problems are addressed, we don't see how the Chief Forester can possibly set an AAC that can meet the objectives of government to sustainably manage the Sunshine Coast Timber Supply.

1. Current State of the Crown Forest Land Base

For generations forestry was a cornerstone of our provincial and regional economy. However chronic over logging for the last 150 years¹ has left us with a dwindling resource.² The only way to solve this problem is to bring the ACC down substantially and immediately.

The [Forest & Range Practices Act \(FRPA\)](#)³ 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 Watershed Forage and Associated Plant Communities, Recreation, Soils, Timber, Visual Quality, Water Quality and Wildlife.

However, the long-term management of BC's vast forest resource for Timber Supply to the exclusion of other values has heavily impacted all these values, including timber supply.⁴ As a result, it is no longer possible to sustain a long-term viable timber supply in BC with status quo forestry practices.

The fall down of BC's Timber supply and unequal sharing of benefits is evident in many ways. Where forestry used to account for up to 150,000 jobs and generate billions for the BC economy, the sector now costs an average of \$365 million per year⁵ and accounts for only 2% of BC jobs.⁶ By contrast, Tourism is one of Supernatural British Columbia's fastest growing industries with over 19,000 tourism businesses employing over 300,000 workers and a projected 106,000 new job openings to become available in tourism by 2028.

While the forestry sector gains economic value through timber extraction, all the other sectors/users generate economic value from the forest through non-extractive practices and experiences and support one another. The economic, social, and environmental value of our forests for biodiversity protection, natural asset management, drinking water protection, carbon sequestration and storage, and climate change mitigation is immeasurable and must be prioritized.

The 2021 Intergovernmental Panel on Climate Change (IPCC) AR6 Climate Change 2021: The Physical Science Basis report⁷ unequivocally verified that that human activity has warmed the atmosphere, ocean and land and caused widespread and rapid changes in the atmosphere, ocean, cryosphere, and biosphere which are unprecedented over many centuries to many thousands of

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

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

³ [Forest & Range Practices Act \(FRPA\)](#)

⁴ <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/visual-resource-management>

⁵ <https://www.focusonvictoria.ca/forests/forestry-doesnt-pay-the-bills-folks-r24/>

⁶ https://www2.gov.bc.ca/assets/gov/data/statistics/employment-labour-market/lfs_employment_by_industry.xls

⁷ <https://www.ipcc.ch/report/ar6/wg1/>

years. Planet Earth is now facing mass extinctions of a projected one million plant and animal species caused by human activity, habitat destruction, and human caused climate change. Carbon emissions resulting from clear cut logging in BC are a real factor in human caused climate change. Old forests are our best ally for carbon storage in a changing climate. Yet less than 3% of all BC's remaining forests are productive old growth. Healthy younger forests are crucial to sequestering carbon, mitigating climate impacts, and ensuring essential habitat to species-at-risk of extinction. Yet, BC forests have become our single largest carbon emitter releasing 82 million tonnes of carbon dioxide annually.⁸

In a province that boasts over 15% terrestrial protection, just over 3% of the Sunshine Coast TSA has been preserved. Nearly all the forest outside of the conserved areas in the TSA is younger forest.⁹ The SC-TSA Timber Harvest Land Base (THLB) is estimated at 189,000 ha. In this area 60% of the forests are under 100 years old, and the minimum harvest threshold for the area has been set at just 40 years. Frankly, this is shocking. Logging 40-year-old trees is not sustainable forestry. It is deforestation.¹⁰ A wasteful, carbon intensive zero-sum game.¹¹

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.¹² Clearly, change must happen now.

2. Urgent Need for Immediate Changes in Forestry Practices Overlooked

The Province completed a Preliminary Strategic Climate Risk Assessment for BC¹³ in 2019. It evaluated 15 climate risk events that could occur in B.C. 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/stream river flooding. All of which are directly linked to forest management practices and all of which came to pass in 2022. Subsequent studies, like the Merkel-Gorley 2020 Old Growth Strategic Review¹⁴, Price, Daust, Holt report, "A Last Stand for Biodiversity"¹⁵ and Peter Woods' 2021 Intact Forests – Safe Communities report¹⁶ point directly to the urgent need for an immediate paradigm shift in BC forest management.

⁸ https://www2.gov.bc.ca/assets/gov/environment/climate-change/data/provincialinventory/2018/bc_provincial_ghg_inventory_1990-2018.xlsx
⁹

¹⁰ <https://www.nationalgeographic.com/environment/article/deforestation>

¹¹ <https://www.nationalgeographic.com/environment/article/deforestation>

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>

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/>

Consequently, on June 1, 2021, the Province released the “Modernizing Forest Policy in British Columbia Setting the Intention and Leading the Forest Sector Transition” paper.¹⁷ The paper explains that the government “policy has not evolved quickly enough to adapt to the impacts of climate change on our forests.” It focuses on the “urgent need” for a more diversified forestry sector that “goes beyond just being more efficient within existing management models.” It promises an “imminent shift” to a more holistic management system and changes to forest policy to “address the rapid decline of available timber in BC”.

In his statement on the intentions paper, Premier Horgan said, “Current forestry policies – put in place two decades ago – don’t adequately address today’s challenges. They have limited our options to adapt to the impacts of climate change, protect old growth, share the benefits fairly with local communities or move forward on reconciliation.”¹⁸

We are seeing this urgent situation play out in real time now. Over the summer of 2022, 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. In the Sunshine Coast TSA, 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 emergency. Canadian armed forces were deployed for disaster relief. The Prime Minister and Premier announced a joint committee on climate change disaster response.¹⁹ Last year alone in BC tens of thousands of people were forced 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.²⁰ All of these losses and costs can be linked back (in part) to the long-term mismanagement of BC’s forested land base.²¹

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. Yet rural communities throughout BC are still constantly under threat of logging in our watersheds. 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

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

¹⁸ https://archive.news.gov.bc.ca/releases/news_releases_2020-2024/2021PREM0037-001060.htm

¹⁹ <https://pm.gc.ca/en/news/news-releases/2021/11/26/prime-minister-and-premier-british-columbia-announce-new-committee>

²⁰ <https://www.theenergymix.com/2021/11/23/b-c-flood-devastation-linked-to-logging-practices-without-question-experts-warn/>

²¹ <https://www.theenergymix.com/2021/11/23/b-c-flood-devastation-linked-to-logging-practices-without-question-experts-warn/>

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

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. And 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.

Yet, none of this appears to have been contemplated in the TSA Data Package.

3. Inadequate Public Engagement Process

The Sunshine Coast TSA is vast and the task of reviewing the timber supply and establishing an ACC for an area this large for the next ten years, with so many competing values, is massive. FLNRO has not adequately engaged local and regional governments or stakeholders in this process. It provided just one “information” meeting by Zoom, a week before the deadline for submissions on the data package. It spent an hour explaining the TSR process and provided a 30-minute Q&A opportunity. When we inevitably ran out of time, FLNRO promised to follow up with answers to our questions but did not do so. Instead, FLNRO staff encouraged stakeholders and local governments to wait for the next phase of the process to provide detailed input.

4. Requests to Improve Data and Management Assumptions and Review Process

We recognize that changing practices is not a simple process. However, there are a few very simple ways that FLNRO can and must adapt to this urgent situation and diminish uncertainties in its recommendations to the Chief Forester²³. The first most critical step is to provide complete up to date data and modelling to support the timber supply review. To ensure the SC-TSA Timber Supply Review Data Package addresses the long-standing systemic problem of out of date, unclear and incomplete data, and management assumptions. In this way, FLNRO can start to address the urgent issues and support the necessary paradigm shift toward more holistic Forest Landscape Planning and management.

As a start we ask that FLNRO provide up to date data, analysis, maps, models, and justifications to address the following:

²³ UNCERTAINTIES OF TIMBER SUPPLY ESTIMATES USED FOR ALLOWABLE ANNUAL CUT DETERMINATIONS August 1, 2020
https://www.google.ca/url?sa=t&rc=t&ct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewidi6aK1pn2AhXTPH0KHSp_BPcQFnoECAIQAO&url=https%3A%2F%2Fwww.focusonvictoria.ca%2Fapplications%2Fcore%2Finterface%2Ffile%2Fattachment.php%3Fid%3D2231&usq=AOvVaw0UctFIh9fAMuk1xYdp4A15

1. Urgent need for a paradigm shift in established management assumptions
2. Lack of current information, data, and modelling to address impacts of climate change
3. Lack of information re: cumulative effects of forestry in the SC- TSA
4. Lack of clarity re: major issues and changes in forest management
5. Outdated vegetation resource inventory
6. Outdated ecosystem mapping
7. Outdated site productivity data
8. Lack of information available to the public re: recent harvest performance assumptions
9. Lack of clear data, mapping, and information about how FLNRO defines, determines, and plans to sustainably manage
 - a. Old growth management areas
 - b. Potentially unstable terrain
 - c. Environmentally sensitive areas (ESA) and problem forest types
 - d. Inoperable areas
 - e. Riparian reserve and management areas
 - f. Streams and rivers
 - g. Lakes and wetlands
 - h. Riparian buffers
 - i. Ocean buffer
 - j. Stand-level biodiversity - wildlife tree retention
 - k. Landscape-level biodiversity
 - a. Cutblock size and adjacency
 - b. Community watersheds
 - c. Community interface zone management
 - d. Marbled Murrelet habitat
 - e. Non-recoverable losses
 - f. Disturbance on the non-harvestable land base
 - g. Decay, waste, and breakage
 - h. Operational adjustment factors
 - i. Future managed stands
 - j. Forest estate modelling

5. Recommendations to the Chief Forester

The SCCA respectfully requests that FLNRO update its TSR data, modelling, and management assumptions to ensure it provides the province's Chief Forester with current and complete information to inform her determination of the allowable annual cut (AAC). We ask that you share these data with the public for review. We ask that FLNRO includes as part of its TSR data package recommendations to the Chief Forester to reduce the AAC to a truly sustainable level; direct FLNRO to undertake a new TSA/TSR immediately upon completion

of the Sunshine Coast Forest Landscape Planning Pilot Project (FLP) set the AAC for a timeframe up to 5 years and establish a new BMP to review and reset the AAC at least once every 5 years thereafter.

Kind Regards,
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Executive Director



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