

Greg Hemphill, District Manager  
Sunshine Coast Forest District  
7077 Duncan Street  
Powell River, BC V8A1W1

August 16, 2000

Re/ draft Bunster Landscape Unit Plan

Attention: Brian Smart

Dear Sir:

Members of the Sunshine Coast Conservation Association are pleased to see Landscape Unit planning finally initiated in the Sunshine Coast Forest District. It is our intention to participate in these processes to the fullest extent possible as decisions at the landscape level will have a direct bearing on the maintenance of biological diversity in this region.

We would like to recognize the immense amount of effort and expertise that has gone into the Draft Bunster Landscape Unit Plan. Given the complexity of criteria and constraining policy that must be taken into account this plan likely represents a best case scenario. Still, the basic question must be asked: does the plan meet the objectives of the Preamble of the Forest Practices Code Act of British Columbia requiring conservation of all forest values and in particular the needs of threatened populations of old growth dependent wildlife? In our response to the draft plan we will discuss this question in regard to the habitat needs of the Marbled Murrelet which is a species of provincial, national and international concern.

The decline of Marbled Murrelet populations everywhere along the coast of North America has been recognized for many years. As well, this decline has been indisputably linked to a loss of suitable nesting habitat. Locally members of the Sunshine Coast Natural History Society have observed the decline of murrelet populations since 1983. A steep decline in the inventory of suitable nesting habitat over the last 20 years has also been documented by resource management agencies and communicated in written submission by designated Environment Officials to the Ministry of Forests and affected forest tenure holders. To date, only harvesting in the Bunster LU has been effected by these circumstances while harvesting in known murrelet nesting habitat has continued without restraint in the rest of SCFD. The weight of evidence describing the survival prospects of the Marbled Murrelet clearly indicates that a crisis situation has developed in the SCFD. It is particularly note worthy that habitat surveys of the summers of 1998 and 1999 have established that the Bunster Hills area supports one of the larger remaining concentrations of nesting murrelets in the Georgia Basin.

Does the draft Bunster Landscape Unit Plan succeed in protecting sufficient nesting habitat to reasonably insure the survival of the species? The short answer to this question is no, it does not protect sufficient habitat to insure the survival of the species, neither does it provide sufficient habitat to maintain existing populations. Numerous restrictions imposed by policy initiatives on LU planning have virtually guaranteed that only token efforts will be implemented. These policy directives limit the impact of the Identified Wildlife Strategy on the Timber Harvesting Land Base (THLB), restrict the location and forest type accepted for Wildlife Habitat Area (WHA) designation, and allow high quality, active nesting habitat to be available for harvesting. This is an example of policy being used to circumvent the letter and intent of legislation, specifically section 41-1b of the Forest Practices Code Act. In the case of the Bunster LU, murrelet nesting populations are still substantial while in the majority of SCFD landscape units populations have diminished radically. It is a well recognized tenant of conservation biology that one must manage natural systems in a precautionary way, i.e., the Precautionary Principle. The effect of policy criteria noted above is that less than half of the necessary minimum set aside of suitable habitat in the Bunster LU is achievable under this plan. As conservation advocates we are very alarmed by this situation. It is our impression that retention of the entire suitable and currently occupied nesting habitat in the Bunster is warranted until it can be demonstrated that the Marbled Murrelet population of the region has stabilized and/or is in a state of recovery.

It is apparent that constraints governing the development of LU plans preclude adequate protection of the Marbled Murrelet in the Georgia Basin. Consequently we concur with T.L. Jones that Marbled Murrelet management requires elevation to a Higher Level Plan. The weight of evidence indicates that even complete protection of suitable habitat in the Bunster Landscape Unit would be unlikely to insure the survival of the species within the Georgia Basin Ecoprovince unless these measures are integrated with similar efforts in many other Landscape Units.

The development of higher level planning initiatives for the SCFD may be awhile in coming. In the interim we ask that the District Manager refrain from granting Category A approvals in known, suitable and active MAMU nesting habitat as this will aggravate an already precarious situation. Members of the Sunshine Coast Conservation Association believe that it is possible to integrate effective wildlife management with the needs of the harvesting industry if the commitment to do so is genuine. Thank you for your time and consideration.

Daniel Bouman, Executive Director

Sunshine Coast Conservation Association