

## **Sunshine Coast Conservation Association**

February 7, 2011

### **Comments: BCTS Elphinstone Operational Plan (2011)**

#### **Introduction**

Public concern about BC Timber Sales (BCTS) Elphinstone operations has reached an acute stage in recent months as logging and planned logging proceeds in second growth stands adjacent to residential areas and in upper elevation old growth. The purpose of this paper is to describe the environmental circumstances of BCTS operation and provide informed comment. As well, this paper will provide some suggestions for moving forward in a positive manner. We hope that the public attention these blocks have received will spur BCTS and the SCRDC to undertake new initiatives to adequately manage and protect Elphinstone's diverse forest resources.

#### **General Biodiversity Protection**

In our region, a small number of parks along with Landscape Unit Plans comprise the bulk of the Province's strategy for maintaining biodiversity within the Provincial Forest. There are some possible additional measures to protect biodiversity that could be undertaken. Part of the BCTS Elphinstone operating area is within the Chapman Landscape Unit (LU), which has an established LU Plan that designates small percentages of each biogeoclimatic sub-zone as Old Growth Management Area (OGMA). Some of these OGMA's are old growth and where old growth is not present, are comprised of second growth. There are no Wildlife Habitat Areas (WHAs) designated in the Chapman LU. The other part of the BCTS operating area is in the adjacent Howe LU, which does not have an established LU Plan, but does have both Marbled Murrelet Wildlife Habitat Areas (WHAs) and Mountain Goat Winter Ranges designated.

The three parcels that make up the Elphinstone Provincial Park are a small but important part of the area's biodiversity protection. Another important element of biodiversity in the Elphinstone area is the veteran trees, which are old trees that have survived previous major disturbances. Wherever these occur, they should be maintained. Currently, we see some effort to avoid cutting Douglas Fir vets but there is no formal protection and these trees are often felled if they are an inconvenience during logging or road building. Generally speaking, the BCTS Elphinstone operating area is lacking in adequate biodiversity protection.

#### **Environmental Considerations - CWHvm**

The ecological classification of the upper elevation cut-blocks in the BCTS operational plan is *Coastal Western Hemlock very-moist maritime* of the second variant (CWH-vm2). This

environment is cool and wet and has a snow pack for about six months of the year. Growing conditions are harsh. Recovery from logging (or any disturbance) is very slow in the CWHvm2, which strongly indicates that inappropriate logging practices will leave a legacy of environmental degradation. In our view, forest management in much of this ecosystem and in the Mountain Hemlock Zone, which is directly above, is not sustainable.

Yellow Cypress occurs in the CWH-vm2 and above in the Mountain Hemlock moist maritime subzone (MHmm). This species is a slow growing, harsh-site specialist often surviving where other species cannot establish. Yellow Cypress trees have been recorded at ages well over 2,000 years. One such tree was found cut down and abandoned in the Caren Range in the early 1990s (on land of the same eco-classification - CWHvm2). A slab of this tree became quite well known as it was used to promote old growth protection during an extensive tour of North America and Europe in 1995.

Clear grain logs or slabs of Yellow Cypress are extremely valuable. However, the mid and lower log grades are not valuable and often end up left as waste. The large ancient Yellow Cypress trees of our region have a very high degree of intrinsic value and are not replaceable. The Sunshine Coast Conservation Association is opposed to the cutting of any ancient Yellow Cypress trees anywhere in the SC Forest District.

### **Environmental Considerations - CWHdm and CWHxm**

The *Coastal Western Hemlock very-dry maritime* forest ecosystem (CWHxm) extends from the waterfront to about 200 meters in elevation in the Roberts Creek and Gibsons area. This is the driest CWH forest in BC. It is also one of the most severely impacted biogeoclimatic subzones in the Province (housing, agriculture and forestry development). The Conservation Data Center recognizes numerous threatened and endangered plant communities within this subzone. In the view of the SCCA, any elements of this ecosystem's biodiversity that still exist should be vigorously defended.

The *CWH dry maritime* (CWHdm) exists between the CWHxm and the CWHvm. Its condition is very similar to that of the CWHxm; heavily exploited by timber interests and lacking in biodiversity protection. In our view, the SCRDP is entirely justified in seeking additional protection for lands connecting the three isolated pieces of the Mount Elphinstone Provincial Park.

### **Wilson Creek Watershed**

Two cut-blocks have been developed for sales that are within the Wilson Creek Watershed: A84612-WC022 and A84612-WC045. The Wilson Creek watershed has been extensively logged in the recent past. In 2003 the Ministry of Forests refused to accept new logging proposals from International Forest Products in this watershed, pending completion of a Coastal Watershed Assessment Procedure (CWAP). This assessment would have quantified the level of hydrological impact from logging and would have led to constraints on the timing of new

logging activity. The CWAP study was never carried out. Since then, a large tract of private land, mostly within the Wilson watershed, was denuded by Columbia National Investments, which dramatically raised the level of hydrological disturbance.

Coho Salmon and Cutthroat Trout represent the most important non-timber values in the Wilson Creek watershed. BCTS has not adequately accounted for these values in their Forest Stewardship Plan or their Operational Plan. BCTS did not create the problem of excessive disturbance but is still responsible for not compromising the situation any further. We recommend that the SCR D engages with BCTS to request that a CWAP is completed and implemented prior to any further disturbance in the Wilson Creek Watershed.

The Fisheries Sensitive Watershed (FSW) designation was created by the provincial government in 2004, when the Forest and Range Practices Act was passed into law, to ensure that the pace of logging activity does not put fisheries values at risk. However, the province has yet to establish a single FSW designation, which is putting fisheries resources at risk in our region. For our part, we intend to nominate the Wilson Creek watershed for Fisheries Sensitive Watershed status, which if successful, will require completion of a CWAP and possibly other remedial efforts. We may approach the SCR D for support in an effort to get the Wilson Creek watershed designated a Fisheries Sensitive Watershed.

And finally, we wish to draw your attention to the fact that BCTS has independent third party certification for its operations in the Georgia basin. It may be time for the SCR D to take a close look at the program deliverables of BCTS's Sustainable Forest Initiative (SFI) certification and see if there are any non-compliances. The SFI program does offer a public complaint process.

Thank you for your consideration of BCTS's Elphinstone Operational Plan and of our comments about this plan.

Daniel Bouman, Executive Director  
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