

# **Review of Draft Old Growth Management Areas Proposed for Five Landscape Units Within the Sunshine Coast Forest District**

Submitted by Sunshine Coast Conservation Association (SCCA)  
OGMA Review Committee

March 19, 2014

To Whom It May Concern:

Thank you for this opportunity to comment on the draft Old Growth Management Areas (OGMAs) for the Homfray, Jervis, Quatam, Salmon Inlet and Southgate Landscape Units (LU) as outlined in the draft Sustainable Resource Management Plans. We are pleased that OGMAs will be legally established as part of an overall strategy to protect biodiversity in our region, but we are very disappointed with the criteria applied for the selections.

We understand that spatial mapping and coordination of complex forest attributes and biodiversity issues, as well as myriad industrial tenures, has been challenging, particularly given limited resources, and we acknowledge the work that has resulted in this document.

We want to be clear, however, that we see this as one piece of the unfinished conservation plan for our region. We are pleased to make recommendations here as to how we see OGMAs fitting into and enhancing an overall plan that includes adequate parks, Ecological Reserves, Wildlife Habitat Areas (WHAs), and Ungulate Winter Ranges (UWRs). We support the process of designating OGMAs *in addition to* parks, as was originally intended.

Unfortunately, it must be stated that not providing the requested seral stage distribution (by BEC variant) tables for each LU, greatly hampered our efforts to review the draft plans. We have relied instead on our submission to TSR 2 to provide context for understanding current conditions within the Sunshine Coast Forest District. The trends are clear and cannot have deviated much since 2001.

We submit our review in two parts: first, comments and recommendations on the legal and policy context within which the OGMAs are being proposed, and second, comments and recommendations regarding specific sites and issues within the Salmon Inlet LU, which we've been able to review in the time allotted. Given current seral stage imbalances in the Sunshine Coast Forest District, we feel each of the five landscape units deserved a separate two month review and comment period.

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## **Context: Law and Policy Implementation**

The Forest Practices Code (1996) introduced conservation planning tools to make the protection of biodiversity a higher priority in British Columbia. Some progress has been made, however, implementation has been less effective due to policy changes, many of which were put in place to mitigate perceived impacts to timber supply and logging rights.

We are extremely concerned that the legal establishment of old growth management areas could become completely irrelevant if OGMAs continue to be selected by logging company field staff<sup>1</sup> on the basis that they're not located anywhere with the slightest chance of being logged in the future. Although the Timber Harvesting Land Base (THLB) has been largely depleted<sup>2</sup>, recruiting second growth for OGMA in lieu of existing old growth, which should be designated to the full targets in LUs assigned either the Intermediate or High Biodiversity Emphasis Option (BEO), is unacceptable.

The Environmental Law Centre of the University of Victoria published an "An Old Growth Protection Act for British Columbia"<sup>3</sup> that addresses issues of OGMA selection and biodiversity protection in our forests. We support the proposed legislation, and believe it should become the template for old growth protection and OGMA creation in the province.

## **Biodiversity Emphasis Options**

All LUs within the Sunshine Coast Forest District (SCFD) should be assigned the High Biodiversity Emphasis Option (BEO), recruiting representative oldest stands first to compensate for the deficit in old growth currently protected within SCFD parks. Intermediate and Low BEO designations do not allow enough retention of old and mature forest, within a reasonable time frame, and as a result their structure, function, and dependent species may not survive over time. We need to protect enough representative area for biodiversity to persist.

We also need to protect contiguous areas, and retain, or recruit in the shortest time possible, interior forest conditions. Current, proposed implementation for Intermediate and Low BEO LUs, permitting "drawdown" to maintain short-term timber supply, creates further fragmentation and edge effect and will not provide enough protection over time.

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<sup>1</sup> 2011, Sunshine Coast TSA TSR Data Package, *Proposed old-growth management areas from licensees* (Homfray, Jervis, Quatam, Southgate LUs) Source: Interfor, March 2010

<sup>2</sup> Attached: Sunshine Coast TSA - Age - Timber Harvesting Land Base 2001

<sup>3</sup> 2013, Environmental Law Centre of the University of Victoria, *An Old Growth Protection Act for British Columbia* <http://www.elc.uvic.ca/press/documents/AnOldGrowthProtectionActforBC-2013Apr10.pdf>

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In the Sunshine Coast Forest District (SCFD), parks and ecological reserves make up just over 3% of the total land base. As well, a higher level planning process has not been undertaken. In a region supporting some of the most biologically diverse ecosystems in Canada, it is of utmost importance that LU conservation planning be fully applied in order to mitigate this alarming imbalance, not only in parkland dedication but also in seral stage distribution across biogeoclimatic zones<sup>4</sup>.

**Recommendation #1:** All landscape units in the Sunshine Coast Forest District should be reassigned a High BEO to compensate for the significant deficit in parks and a corresponding deficit of old growth protected in parks, assumed to be 12% for the Biodiversity Guidebook calculations<sup>5</sup>.

### **Wildlife Habitat Areas (WHAs) and Connectivity**

Landscape Unit Planning uses a coarse filter and fine filter approach to protect biodiversity. The coarse filter is the OGMA, to protect a representative sample of old seral stage forest, structure and function, and the fine filter is Wildlife Habitat Area (WHAs) that will ensure habitat for specific species is protected, as well. This helps to create connectivity in the landscape and is urgent in the SCFD due to the small percentage dedicated as parks and the lengthy history of timber harvesting. We note that while Goat UWR has been designated and will continue to provide valuable habitat during harsh winters, Deer UWR has not. Marbled Murrelet (MAMU), Tailed Frog, Northern Goshawk and other species also still need official legal protection in the form of WHAs, across the SCFD LUs.

The SCCA has nominated 51 MAMU WHAs within the SCFD. The maps of the nominated areas can be viewed at [www.thescca.ca](http://www.thescca.ca). Go to “Maps”.

**Recommendation #2:** Deer UWR and WHAs for MAMU, Goshawk and other species throughout the SCFD, need to be established as a matter of urgent priority, before irreplaceable critical habitat is lost. In the meantime, suitable habitat, which has already been identified and mapped, needs to be protected.

### **First Nations Considerations**

We respect First Nations rights to their traditional territory, and want to hear from them as to how the proposed OGMA's will or will not affect them.

**Recommendation #3:** First Nations rights and title text should be changed to “First Nation’s approval requested”, within the LU plan text

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<sup>4</sup> Attached: Sunshine Coast Forest District Parks 2001

<sup>5</sup> 1995, Forest Practices Code of British Columbia, *Biodiversity Guidebook*, Appendix 4, Estimation of natural seral stage distribution, p. 90 - 91.

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## Subsurface Resources: Exploration and Development Activities

“...Exploration and development activities related to mineral and gas extraction are permitted in OGMA's and therefore establishment of OGMA's will not impact the status of these permits or tenures. ...”

The integrity of old growth protection within designated OGMAs is eliminated by these exceptions<sup>6</sup>. For example, substantial incursions into OGMAs (#73 & #79) have already been made in the Sechelt Peninsula LU by Pan Pacific Mines, which have not been appropriately mitigated.

**Recommendation #4:** OGMAs need to have legal protection from exploration and development activities related to mineral and gas extraction.

## Salmon Inlet Landscape Unit

Based on our limited review to date we have the following comments for the Salmon Inlet Landscape Unit.

This landscape unit has an extensive history of timber harvesting and the draft plan states that fully 38% of the forest within the Salmon LU is less than 40 years old. Early seral forest has already exceeded the benchmark BG maximum early seral stage distribution for NDT 1 (36%) and NDT 2 (30%) and we would like to see restoration planning. Some recommendations to this effect are listed below.

1. Most of the proposed OGMAs do not provide interior forest conditions.<sup>7</sup>

A patch of forest 400 m wide will generally contain little, if any, forest interior. Targeting at least 600 m as a minimum width when providing forest interior should be the management objective. This would give a core of 200 m in the centre, which, while not large enough to protect from possible biotic edge effects, is buffered from most microclimatic edge effects.<sup>8</sup>

According to our measurements, only two OGMAs, #28 and #64, have interior forest conditions within their boundaries when the BG indicates that, for the

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<sup>6</sup> 2012, Forest Practices Board, Special Investigation Report 36, *Conserving Old Growth Forests in British Columbia* (p. 4): “The Board notes that while the Environmental Protection and Management Regulation [10](#) under the Oil and Gas Activities Act provides for the responsible minister to legalize OGMAs, thereby ensuring their protection from the impacts of oil and gas activities, this has not yet happened.”

<sup>7</sup> 1995, Forest Practices Code of British Columbia, *Biodiversity Guidebook*, Appendix One.

<sup>8</sup> IBID

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Intermediate BEO, interior habitat should comprise 50% of the old seral target in NDT 1 and 25% within NDT 2<sup>9</sup>.

We are concerned that many of the OGMAs, for example #73, #301, #313, #80, #196 while valuable as riparian strips, are very narrow, and are all edge forest, which may result in blowdown. Micro-climatic change will negate any expectation of protecting biodiversity, over time.

We would like to see these OGMAs added to in order to at least achieve the recommended targets for interior forest habitat identified in the BG.

**Recommendation #5:** add to proposed OGMAs to create the minimum of 600m x 600m, so that forest interior conditions are maintained

2. We are concerned that ~383 ha of proposed OGMA has been placed in parks and does not capture the best available examples of old growth *that need protection*. For example, OGMA #119 (protected area, Tetrahedron Park) is age class 9 forest, however it includes alpine tundra, so does not qualify suitably for OGMA. We question the criteria that were used to place this OGMA, and others that were placed within existing parks and protected areas. We note that OGMAs were originally intended to be additional to protected areas (see Footnote 5). Re-protecting old growth in parks and protected areas amounts to double counting.

**Recommendation #6:** replace OGMAs #2, #21, #118, #119, #162, #290, #312, #321 with suitable old forest outside parks and protected areas

3. There are opportunities to conserve integral areas around larger pristine habitats that will otherwise be fragmented by industrial activity.

Example: Phantom Lake

Phantom Lake is an area of special concern because it is a largely intact, natural ecosystem, with high wildlife values. We note that OGMAs have been placed (clustered) around the lake, where appropriate, and some inoperable between them will provide additional, important, connectivity. We would like to see these areas legally protected. We also see that this has the potential to be improved and enlarged with MAMU WHA. The SCCA has nominated a MAMU WHA at the south end of Phantom Lake. This entire area would make an excellent park candidate because it would provide connectivity with Tantalus Park as well.

**Recommendation #7:** capture the entire Phantom Lake area with OGMA, MAMU WHA, and park protection

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<sup>9</sup> 1995, Forest Practices Code of British Columbia, *Biodiversity Guidebook*, Old seral stage retention and representativeness (NDT 1) p. 19 and (NDT 2) p. 25.

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4. We are concerned that MAMU habitat has not been captured for OGMA where quality is there, including interior forest conditions.

5. We see OGMA #86, beside Sechelt Lake, as well placed. We would like to see it extended to 600 m in width to capture interior forest conditions.

6. We are pleased to see that suitable overwintering habitat has been protected in the form of Goat Winter Range (UWR), and OGMAs overlay UWR, where appropriate. Note that Deer Winter Range still needs to be protected in this LU.

### **Summary of Recommendations for the Salmon LU**

**Recommendation #1:** All landscape units in the Sunshine Coast Forest District, including Salmon Inlet, should be assigned a High BEO

**Recommendation #2:** WHAs need to be established for MAMU and other species throughout the SCFD, as a matter of urgent priority, before irreplaceable critical habitat is lost. In the meantime, suitable habitat, which has already been mapped and identified, needs to be protected

**Recommendation #3:** First Nations rights and title text should be changed to “First Nation’s approval requested” within the LU plan text

**Recommendation #4:** OGMAs need to have legal protection from exploration and development activities related to mineral and gas extraction

**Recommendation #5:** add to proposed OGMAs to create the minimum of 600m x 600m, so that a minimum of 25% of the old growth target for CWHdm is maintained as forest interior conditions and 50% of the old growth target for the CWHvm1, CWHvm2 and MHmm1

**Recommendation #6:** replace OGMAs #2, #21, #118, #119, #162, #290, #312, #321 with suitable old forest outside designated Parks and Protected Areas

**Recommendation #7:** capture the entire Phantom Lake area with OGMA, MAMU WHA, and park protection

Attached:

- Sunshine Coast Forest District Parks, 2001
- Sunshine Coast TSA - Age - Timber Harvesting Land Base, 2001