



Sunshine Coast
Conservation
Association

PO BOX 1969, SECHELT, BC V0N 3A0, www.thescca.ca

March 8, 2011

Sechelt Community Projects, Incorporated (SCPI)
201-5606 Wharf Avenue
Sechelt, BC
V0N 3A0

Attention: SCPI Board of Directors and Staff

Re/ Proposed Cut-block EW002 in the Wilson Creek Watershed

To Whom It May Concern:

I am writing to request that SCPI initiate and complete a formal Coastal Watershed Assessment Procedure (CWAP) process for the entire Wilson Creek watershed and delay the timing of harvesting in accordance with the results of the assessment process. The CWAP is the standard methodology in BC for assessing hydrological recovery in heavily disturbed watersheds, particularly where there is a potential for logging to put fisheries values at risk.

Just to review, this watershed was subjected to excessive harvesting in the recent past. In the 2002, the Ministry of Forests responded to the excessive harvesting by directing International Forests Products (Interfor) not to propose any new cutting in this watershed until a CWAP had been completed. It should also be noted that Interfor's logging in the Wilson watershed prior to 2002 was ineffective in protecting riparian values; most of the leave trees along Wilson and Husdon creeks blew down almost immediately after harvesting, which increased instability within the system.

Adding to the problems created prior to 2002, Columbia National Investments denuded a large tract (~150 hectares) of young forest in the Wilson Creek watershed in 2007, substantially increasing the level of hydrological disturbance. During this logging, CNI failed to protect adjacent wetlands, installed inadequate culverts, failed to leave sufficient riparian cover and damaged stream banks. CNI was charged and convicted in Sechelt Provincial Court for violations of the *Water Act*.

We would like SCPI to undertake a thorough CWAP and take this opportunity to establish a responsible course for the future. Qualified individuals should traverse (on foot) every stream in each sub-basin of this watershed. As well, each sediment source

should be identified and the condition of each road, culvert and stream crossing should be assessed in the field.

The CWAP process is usually undertaken in cooperation with other stakeholders. The Department of Fisheries and Oceans has management authority over Coho, Chum and trout and have invested in enhancing Wilson Creek runs. We expect SCPI to consult fully with DFO.

We note that SCPI will need to ask private managed forest land owners and residential property owners for permission to examine the creek where it passes through their properties. This shouldn't be difficult and shouldn't be considered an unreasonable task for a "community" forest.

In the course of the CWAP, consultation with residential property owners is particularly important because they have vested interests in the watershed (water licenses and agricultural land) and a direct stake in water quality, quantity and timing of flows.

Climate change is another consideration that is becoming mandatory in virtually every aspect of our community's life and economy and should be considered in this CWAP. The best, currently available, scientific information clearly indicates that coastal watersheds now have higher, more energetic flows during the winter and lower flows during longer dry spells in the summer. A sustainable plan for hydrological recovery in the Wilson Creek watershed will need to account for the effects of climate change.

And finally, we have reviewed the study SCPI commissioned from Dobson Engineering Limited (K. Eakins, A Hydrological Assessment of the Wilson Creek Watershed, Sept. 2009). This study, on the strength of less than a day's worth of field inspection, concludes with very broad recommendations that support more harvesting and only the usual riparian setbacks. It also contains what we consider to be a frivolous rationale for ignoring Wilson Creek's massive "equivalent to clear-cut" condition of over 35%. (A critique of the DEL report will be available shortly).

The SCCA has been concerned, from the very outset of the Probationary Community Forest License application process, that the land base for your license was far too small to support sustainable community forestry and that this would result in a lower standard of environmental stewardship than was the case under the previous tenure holder. It appears that our concerns are justified. We urge SCPI to undertake a thorough Coastal Watershed Assessment Procedure prior to considering any harvesting activity in the Wilson Creek watershed.

Thank you for your consideration.

Daniel Bouman, Executive Director
Sunshine Coast Conservation Association

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Cc

Sechelt First Nation
Sunshine Coast Regional District
SCRD Natural Resources Advisory Committee
District of Sechelt, Mayor and Council
Department of Fisheries and Oceans
Nicholas Simons, MLA
Community Forest Advisory Committee

and various distributions