



Sunshine Coast
Conservation
Association

Box 1969, Sechelt, BC V0N3A0

March 8, 2007

Premier Gordon Campbell

PO Box 9041, Stn Prov Govt

Victoria , BC V8W 9E1

Re/ Strategic Land Use Planning for the Sunshine Coast Forest District

Dear Premier Campbell,

The members of our Association were heartened to read your comments in the Coast Reporter of April 7, 2006 about the coming Sunshine Coast Land and Resource Management Plan (LRMP) process. Since then we have participated in a government scoping process, ostensibly undertaken to identify participants and outline the scale of land use issues and conflicts needing resolution at a strategic planning level.

However, we are concerned that to date, we have not received any indication that government is actually prepared to move forward in the manner described by your comments nearly a year ago.

For your information, I draw attention to several areas of outstanding conservation concern, where long standing and current government policies have allowed critical biological assets to be neglected, ignored, compromised an/or severely damaged. The fact that these issues are currently unresolved is an extremely significant indication that high level strategic planning is now more necessary than ever. Here is a brief list of some of the outstanding issues:

- *Fisheries.* Once a major contributor to the wealth of the province and especially our regional economy, fisheries in this district exist in remnant condition with even some very common species, such as the Coastal Cutthroat Trout, in steady decline. Not one single drainage in this forest district has been designated as a "Fisheries Sensitive Watershed" under the Forest and Range Practice Act. Conservation and restoration of this resource is urgently needed.
- *Mountain Goat Winter Ranges.* These critical habitats have been traditionally recognized in the course of BC forestry for more than a hundred years, yet the Ministry of Forests irrationally refused to allow recognition of this resource in 1998 (a Forest Practices Code implementation deadline). Since then and despite findings and attention from the Forest Practices Board, no designations have been established and several licensees (most notably International Forest Products) have proceeded with logging in known winter ranges.
- *Marbled Murrelets.* This seabird has provincial and federal recognition as a Threatened

species. It is an offence under the Species-At-Risk Act to disturb the residence of this bird in any way whatsoever yet current provincial government policy limits habitat protection to areas that can not be logged. It appears that in the absence of effective higher level planning, private prosecutions may be necessary to enforce the federal Species-At-Risk Act (SARA).

- *Other Identified Wildlife Management Strategy (IWMS) species.* Although many at-risk species have been appropriately recognized in this strategy, effective conservation strategies have not been forthcoming. It appears that this program is defunct and can not achieve the necessary results. A few of the affected species involved are; Grizzly Bear, Tailed Frog, Red-legged Frog, Queen Charlotte

Goshawk as well as numerous threatened and endangered plant communities.

- *Declared Areas.* Under the Declared Area provisions of the *Forest and Range Practices Act*, logging companies can now protect areas of potential economic interest from government conservation initiatives and/or future changes in government's goals and objectives. The consequence of these provisions is that the necessary conservation measures noted above will be impossible to achieve with out a comprehensive strategic land use planning initiative.
- *Landscape Unit Planning and Old Growth Depletion.* Landscape Unit planning has come to a complete stop in this forest district. As well, in the low-elevation ecosystems of more than half of the region's landscape units government policies have allowed old-growth inventories to be drawn down to 1/3 of the established MoF target levels. Old growth is well known to be a key component of biodiversity maintenance. The current situation, from a scientific perspective, is highly irresponsible.
- *Annual Allowable Cut Levels.* The last Timber Supply Review (TSR) for the SC Forest District is now 8 years out of date. Previous reviews (TSR I and TSR II) identified many issues for future TSRs to deal with. These issues involve land allocations to account for the needs of non-timber values and the fact of an impending timber supply fall-down caused by overcutting. The absence of any comprehensive approach to dealing with this supply fall-down, has resulted in a radical reduction in the age of harvested stands. This in turn results in harvesting of a lower average log grade and greater levels of waste as well as a loss of forest productivity, value added potential, non-timber product opportunity and community jobs. Timber supply issues need to be frankly examined in full view of the public.
- *Public Drinking Watersheds.* None of the source areas for community drinking water supply in the SC Forest District are protected from industrial activity. The goal and objective of government for management of these areas is for industrial activity to not impact water coming from publicly owned water treatment plants, unless this causes an adverse impact on timber supply. This situation is completely unacceptable to the people of Powell River and the Sunshine Coast.
- *Protected Areas.* Less than 3% of the SC Forest District is protected as park. Local governments and populace of the Sunshine Coast were scarcely involved and not directly represented in the 1996 Southwestern BC Protected Areas Process that left this region with so little protection of our natural habitat. The current level of land protection is entirely inadequate to meet the needs of our growing communities or to maintain the region's biological diversity. Other forms of land protection have proven to be inadequate; Old Growth Management Areas (OGMA) and Wildlife Habitat Areas (WHA) are still open to all industrial activities other than logging. Note Pan-Pacific Aggregate's destruction of an irreplaceable OGMA during exploration on the Sechelt Peninsula. Given

the proximity of the Sunshine Coast to the 2010 Olympics, this disregard for ecological sustainability may prove to be an international embarrassment for British Columbia.

In closing, we would like to point out that, despite the neglect and denial of the past, all of these issues are resolvable without unreasonable impact to any stakeholder, if government will show leadership by committing resources to comprehensive higher level strategic land use planning, equal to or better than the LRMP processes which have already been accorded to 85% of BC.

Thank you for your consideration of sustainability for our region.

Yours truly,

Daniel Bouman, Executive Director

Sunshine Coast Conservation Association

Cc

Jessica McDonald, Deputy Minister to the Premier

Hon. Rich Coleman, Minister of Forests and Range

Hon. Barry Penner, Minister of the Environment

Hon. Pat Bell, Minister of Agriculture and Lands

Nicholas Simons, MLA, Powell River Sunshine Coast

Jim Snetsinger, Chief Forester

Bruce Sieffert, Integrated Land Management Bureau

Bruce Fraser, Chair, Forest Practices Board

Chairs and Directors: SCR D, PRR D and CSR D

Eagle Walz, PR Parks and Wilderness Society

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