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February 14, 2010

Mr. Bill Zinovich  
Integrated Land Management Bureau  
Suite 142, 2080 Labieux Road  
Nanaimo, BC V9T 6J9

**Re: Imminent Logging on District Lot 33, Nanoose Bay**

Dear Mr. Zinovich:

BC Nature is very concerned to learn that logging is being considered for a 120 ha parcel of Crown Land, District Lot (DL) 33 in Nanoose Bay on Vancouver Island.<sup>1</sup> There are a number of ecological reasons why we feel strongly that this parcel should not be logged. As well, the negative impacts on local residents range from very serious to unfortunate. To prevent the destruction of part of an endangered forest type and the ecological damage that would follow logging, we urge you to reconsider this decision.

The primary argument for leaving this parcel intact is that it is of the ecological type 'Coastal Douglas-fir moist maritime (CDFmm).<sup>2</sup> CDF has been Red-listed and labeled 'globally imperiled' by the BC Conservation Data Centre. It is very rare on Vancouver Island and is even rarer there on Crown lands. In addition, according to a conservation evaluation prepared for the BC Ministry of Forests and Range by Madrone Environmental Services Ltd., DL 33, has a rank of 2.8, based on size, condition and landscape context. Its rank is very close to that of old-growth forest.<sup>3</sup> The Douglas-fir dull Oregon grape plant community within DL 33 is an excellent example of this type of plant community.

The government's current practice for CDFmm lands is to conserve them. On p.43 of a July 29, 2009 report by Chief Forester Jim Snetsinger it is stated that "In the absence of legal provisions, BCTS [British Columbia Lumber Sales] and MFR [Ministry of Forests and Range] staff are managing conservation of CDFmm at an operational level by not harvesting and not issuing any new licenses that would permit harvesting."<sup>4</sup> This would seem by itself to be sufficient argument to refuse logging; but there are other strong arguments as well.

DL33 contains sizable wetlands with a combined wetland- pond area of about 1 ha. The ecological value of wetlands for critical hydrological functions, water quality maintenance, and wildlife habitat is extremely high. As well, its financial value for these and other functions has been estimated at \$22,000 per ha per annum.<sup>5</sup> The value of ecological functions is incalculable, but even the financial value of the wetlands on DL 33, when added over a very few years, exceeds the one-time profit to be made from logging it.

Destruction of this wetland also contradicts the government's stated policy of protecting such places. On July 27, 2009, Minister Penner announced in Surrey, BC, that "Protecting our wetlands is a key part of the B.C. Government's Living Water Smart plan for keeping our water healthy and secure for everyone." At this occasion, the Wetland Stewardship Partnership (WSP) was formed jointly by government and several non-government organizations. Les Bogdan, chair of the WSP, remarked: "The Wetland Stewardship Partnership is committed to ensuring that B.C. is a province where wetlands and their large watersheds are valued and conserved for today and for tomorrow."<sup>6</sup>

A third ecological reason to leave DL 33 intact is its location adjacent to the Important Bird Area (IBA) BC056 (Little Qualicum Estuary to Nanoose Bay). The destruction of its forest and wetlands would have significant negative impact on the IBA, an internationally significant and recognized designation.

IBA BC056 is predominantly a coastal and maritime environment, but extends inland for several kilometers along rivers that are critical for the IBA's viability. The marine environment interacts with nearby inland regions including DL 33. Maritime and terrestrial ecosystems adjacent to each other do not exist in isolation and the bird and wildlife species living there depend on both for their survival. For example, the Marbled Murrelet, a BC Red-listed species, nests in inland forests and suitable habitat for it has been identified in DL33.

There is also a very direct ecological connection between DL 33 and IBA BC056. Casper Creek originates in DL 33 and flows into Nanoose Creek which empties into the Nanoose Bay Estuary. The Estuary, which is part of IBA BC056, constitutes the Nanoose Unit of the Qualicum National Wildlife Area and provides important bird habitat. Any disturbance of DL 33 will have negative impact on the health of this water course and thus on IBA BC056.

Yet another ecological consideration is the fact that Coho and Chum salmon spawn in Casper Creek. Our understanding is that salmon spawning habitat is protected whereas logging DL33 would put this spawning stream at great risk.

There are also reliable reports of a number of Red- and Blue-listed plant and animal species living in the DL33 lands. The group who walked DL 33 on Feb. 6 (see <sup>2</sup> below) found two Blue-listed species, a Red-legged Frog and a Pacific Sideband Snail, and observed 13 resident bird species and 67 individual birds. This is a very good tally for an inland forest habitat in winter. The count would be considerably higher once migratory birds arrive.

No thorough study of the flora and fauna has ever been done in the parcel. Given the endangered nature of the CDFmm forest type, such a study would appear to be the very minimum that should

be done before logging is even considered.<sup>7</sup>

From a human-impact perspective, logging DL 33 would negatively impact the watershed of Nanoose Bay, and the quality and quantity of the water available to the population of Nanoose Bay. This semi-rural residential area has a population of around 6,500 which already has significant water restrictions for several months every summer. Logging DL 33 will dry up the “natural sponge” constituted by the forest and wetlands and decrease the water quality and quantity available to the community.\

Such a result would certainly be contrary to Minister Penner’s pledge in the Surrey address to “... keep[,,,] our water healthy and secure for everyone.”.

From an aesthetic enjoyment point of view, logging would destroy the great beauty of a forest, along with the wildlife that live there. It is hard to overestimate this value, especially since so little of this rare kind of ecosystem remains on Vancouver Island. DL 33 is Crown Land and thus belongs to the people. It should be conserved for the considerable population of the area to enjoy its beauty and variety of life. The nearby population from Nanaimo to Qualicum Beach and beyond, as well as visitors to the area, would no longer be able to enjoy and be inspired by it. This is a value beyond any short-term and extremely limited financial ‘benefits’ that might be gained from destroying the forest.

We urge you not to allow logging for DL 33 and to conserve permanently this rare and beautiful ecosystem for present and future generations.

Yours truly

Anne Murray and Rosemary Fox  
Co-chairs, Conservation Committee  
BC Nature

Cc The Hon. Gordon Campbell, Premier of British Columbia, Victoria, BC: [premier@gov.bc.ca](mailto:premier@gov.bc.ca)  
The Hon. Barry Penner, Minister of Environment, Victoria, BC: [barry.penner@gov.bc.ca](mailto:barry.penner@gov.bc.ca)  
Mr. George Holme, Director, Regional District of Nanaimo, Electoral Area E, Nanaimo, BC: [gholme@shaw.ca](mailto:gholme@shaw.ca)  
The Hon. Pat Bell, Minister of Forests and Range, [For.Minister@gov.bc.ca](mailto:For.Minister@gov.bc.ca)  
Jim Snetsinger, Chief Forester [Jim.Snetsinger@gov.bc.ca](mailto:Jim.Snetsinger@gov.bc.ca)

Text References:

1. Pictures of the forest on DL 33 are available, along with much other information, at <http://www.nanoosebayforest.com/>. A Google Earth picture showing how the parcel is situated within a semi-rural residential area with some surrounding parcels clear-cut is at <http://members.shaw.ca/halaue/DL33View.tiff>. DL 33 is the dark green square in the center of the picture.

2. A group of people experienced in forest and wildlife matters (a retired forest technician with the BC Ministry of Forests for 35 years, a registered professional biologist/botanist, a naturalist from the Nature Trust of BC, a staff scientist and National Field Office Director for the BC Wilderness Committee, the Vancouver Island Outreach Coordinator for the BC Wilderness Committee, and an ornithology student with an interest in marine/terrestrial interactions) walked Parcel DL 33 on February 6, 2010 and determined that the forest is most certainly of the CDFmm kind, with only a minor amount of other species present. Please note that when a parcel of land falls into two subzones it becomes the subzone which is most highly endangered, which is CDFmm in this case.
3. This report is available at <http://nanoosebayforest.com/madrone2006report.pdf>.
4. The report is available at <http://nanoosebayforest.com/chiefforesterreport2009.pdf>.
5. See p.73 of the "Federal-Provincial Ecosystem Inventory: East Vancouver Island and Gulf Islands, 1993 - 1997, Technical Report, No. 345."
6. See <http://www.ducks.ca/province/bc/news/2009/090727.html>. Also see the WSP Wetland Action Plan of July 2009 at <http://www.ducks.ca/province/bc/news/2009/pdf/090727-4.pdf>.
7. The website <http://www.nanoosebayforest.com/> lists a number of mammal species that have