



Reference: 240991

November 5, 2018

VIA EMAIL: aburger@uvic.ca; manager@bcnature.ca

Alan E. Burger, Ph.D., President
BC Nature
1620 Mt. Seymour Road
North Vancouver, British Columbia
V7G 2R9

Dear Dr. Burger:

Thank you for your letter of July 20, 2018, to Premier Horgan regarding BC Timber Sales (BCTS) operations in the Silverdaisy area, known as “the donut hole” between Manning and Skagit Parks. I have been asked to respond and apologize for the delay.

The history of the Silverdaisy area, including the 1984 US-Canada High Ross Treaty, the creation of the Skagit Environmental Endowment Commission (SEEC), and the agreement between the City of Seattle and the Province of British Columbia, is well understood and respected by our government. It is our intent to honour the Treaty, including commitments to protect the ecological integrity of the area and the recovery of species at risk through the implementation of conservation measures in the small area that was identified for resource development.

When viewed in terms of the SEEC mandate to preserve and conserve the Skagit Watershed above Ross Lake Dam, it is important to note that 70 percent of the Canadian portion of the watershed is fully protected in parks. There are also additional areas designated as Wildlife Habitat Areas (WHAs) and Old Growth Management Areas (OGMAs) that further increase protection. In the Silverdaisy area, 1,900 hectares (30 percent of the area) is located within OGMAs and WHAs to protect long-term spotted owl habitat and sensitive species.

There are three main drainages within the Silverdaisy area (Smitheram, Silverdaisy and 26 Mile Creek), which together total 5,800 hectares. There is historic mining and active exploration in Smitheram Creek and 168 active mineral claims in Silverdaisy. The decision to exclude Silverdaisy from Manning and Skagit Parks was due to these active mineral claims, and it was subsequently included in the Fraser Timber Supply Area. The area was then assigned to BCTS as an operating area for sustainable forestry operations.

Page 1 of 3

Past and current forest harvesting operations in the Canadian portion of the Skagit Watershed represent approximately 3 percent of the Silverdaisy area and only 0.2 percent of the Canadian portion of the watershed by area. This modest opportunity for sustainable resource use within the watershed overall is consistent with conservation objectives, particularly given the significant additional special management practices being undertaken.

The active Timber Sale Licence (TSL) in Smitheram Creek was awarded in 2015 and the licensee is building access roads, falling timber, and yarding in the TSL. This licence was issued in accordance with BC's laws and regulations that govern forest management and in accordance with the Treaty that permits responsible resource use of this area. The current activities of BCTS will not compromise the integrity of adjacent park lands, as operations are a significant distance from park boundaries and have been carefully planned to ensure that they will not impact wildlife, biodiversity or recreational values. Additionally, planning operations pay close attention to fish conservation, and creeks are surveyed by qualified professionals to determine if they are fish bearing. All streams in the active TSL are non-fish bearing. Furthermore, the roads and ditches are designed to minimize sedimentation, and culverts are designed to handle peak storm flows.

A number of engagement activities to seek public input on the land management objectives for Silverdaisy have occurred recently, including the Chilliwack District Fraser Timber Supply Review in 2015, the Chief Forester's Allowable Annual Cut Determination in 2016, and the BCTS Forest Stewardship Plan (FSP) replacement in 2017. All of these processes included significant engagement of British Columbians; the FSP process alone included advertisements in 9 newspapers throughout the lower mainland, 5 open houses, extensive online engagement and consultation packages mailed directly to over 170 stakeholders (including organizations, individuals, First Nations and government agencies). In all of these public processes, a timber management objective was identified for the Silverdaisy area.

Stakeholder input for on-the-ground activities has also been sought through the online publishing and distribution of hardcopy packages of Operating Plans to stakeholders, First Nations, and agencies within the ministry for review and comment. The Operating Plan for the current TSL was completed in 2012, and the preliminary shapes for the proposed volume of 67,000 cubic metres were published in the 2017 Operating Plan.

It is important to note that the proposed blocks are included in Operating Plan 643-3, which was sent to First Nations and stakeholders, including SEEC and BC Parks, on October 12, 2018. The plan is available at: https://www.for.gov.bc.ca/FTP/TCH/external/!publish/FSP/Chilliwack/Information_Sharing/Digital-Data-Operating-Plan-643-3/.

Operating Plan 643-3 has information on the proposed blocks and roads in Silverdaisy. Table 1 of the plan describes the harvest areas SD114, SD115, SD116 and SD117, and Table 2 describes the roads SD3000 and SD3100. The spatial location of the blocks can be found in the Five Year Plan directory on file DCK_20K_OP643-3_5YearSchedule_2019-2023_92H015.pdf. A final decision on whether to proceed with these blocks will be made over the coming months and, if approved, the area would be auctioned in late 2019 or 2020. Once a decision is made on the future volume, there will be no additional plans for future harvest in Silverdaisy until 2035.

Alan Burger, Ph.D., President

Thank you for taking the time to express your concerns. Please be assured that the Province of British Columbia takes your comments seriously and is committed to working transparently with all stakeholders to deliver on our sustainability objectives.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Stagg", with a long horizontal stroke extending from the top of the signature.

Chris Stagg
Assistant Deputy Minister

pc: Honourable John Horgan, Premier of British Columbia