



Federation of Mountain Clubs of BC

Accessing the backcountry one step at a time

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October 31, 2018

Honourable John Horgan
Premier of British Columbia
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Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource
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Honourable George Heyman
Minister of Environment and Climate
Change Strategy

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Dear Sirs:

Re: BC Timber Sales Operations within the Silverdaisy Area known as “Donut Hole”

The Federation of Mountain Clubs of BC (FMCBC) promotes self-propelled activities, such as hiking, mountaineering, trail running, snowshoeing and backcountry skiing through leadership, advocacy and education. We are a federation of 44 outdoor clubs with a membership of over 5,100 people from across the province. We engage with outdoor recreation organizations, government agencies, commercial operators and others to protect and maintain access for quality non-motorized recreation in BC’s mountains and wilderness.

We write regarding BC Timber Sales operations within the “donut hole”, a wild and unprotected area of approximately 5,800 hectares, which encompasses three main drainages, Smitheram, Silverdaisy and 26 Mile Creek, and which is sandwiched between Manning and Skagit provincial parks.

We are opposed to any further logging activities within the “donut hole”, including construction of roads and logging of additional cut blocks, for the following reasons:

- Some of the planned clear cuts are within the viewshed of Silverdaisy Peak, a popular hiking destination accessed via a trail that starts in Manning Park.
- The “donut hole” includes spotted owl habitat in lower elevations and grizzly bear habitat in its upper elevations.
- We are concerned that the proposed logging in the Silverdaisy and 26 Mile Creek drainages have not considered mountain goats and the ungulate winter range. In

February 2018, Paul Kubik was backcountry skiing on the north slopes of Silverdaisy Mountain across Highway 3 from Skagit Bluffs, when he observed tracks of mountain goats above the elevation of 1350 meters. Mr. Kubik reported his observations to Mike Peters, District Manager, Resource Operations – Chilliwack (see attached email dated February 28, 2018, along with his two maps) because it did not appear that this area had been included in the inventory of ungulate winter range. Mr. Kubik was concerned that the logging cut block boundary at the bottom of the slope may have been set without regard to the ungulate winter range. The FMCBC shares Mr. Kubik’s concerns that the proposed logging activities in the Silverdaisy and 26 Mile Creek drainages have not considered the ungulate winter range.

- The logging activities which occurred this past summer in the Smitheram Creek drainage and the proposed blocks being considered in the Silverdaisy and 26 Mile Creek drainages in the 2018 Operating Plan for auction in late 2019 or 2020, if approved, frustrate the mandate of the Skagit Environmental Endowment Commission (SEEC). This cross-boundary organization was set up to monitor and protect the Upper Skagit River Watershed and has sought to acquire the mineral claims within the “donut hole” and transfer the “donut hole” to BC provincial park system.

We therefore ask that BC Timber Sales be instructed to cancel plans for further logging in the “donut hole” in the interest of maintaining the long-term goal of SEEC and BC Parks to incorporate the “donut hole” lands into our provincial park system.

Regards,

Barry J Janyk
Executive Director
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Enclosures

1. Email dated February 28, 2018 from Paul Kubik
2. Two maps showing area of observation