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VIA EMAIL: barry.janyk@mountainclubs.org

Barry J. Janyk, Executive Director
Federation of Mountain Clubs of BC
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Dear Barry Janyk:

Your letter of October 31, 2018, regarding BC Timber Sales (BCTS) operations in the Silverdaisy area, known as the “donut hole” between Manning and Skagit Parks, has been referred to me for a response.

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 protected in OGMAs and WHAs located to protect long-term spotted owl habitat and sensitive species.

The Silver Daisy area does not currently contain an established Grizzly Bear population (e.g. no confirmed territorial females). The ministry has conducted work to assess risks to potential future bear populations and key indicators such as road density, proportion of landscape-level core habitat, and habitat capability in terms of abundance of seasonal food, suggest that Grizzly Bear population recovery may be viable. However, the majority (over 90 percent) of the area is classed as front country, which creates a substantive risk of human/bear encounters and, consequently, there is not a specific recovery objective for bears in the area.

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Mountain goat populations in the Silverdaisy area have been monitored over the years and individuals or tracks have been sighted in the area, most recently by Mr. Kubik in February 2018. A 2007 study of seasonal habitat for mountain goats in the Skagit Watershed identified two candidate goat winter range areas in Silverdaisy. These polygons have not been designated as Goat Winter Range under the *Forest and Range Practices Act*. The current and proposed road and block locations do not overlap either of the candidate polygons.

It is not clear that at a landscape level logging will have an impact on grizzly bear or mountain goat viability, as logging represents a small percentage of the area. Vegetation management after harvest is not usually required in higher elevation plantations but, if required, BCTS would likely use mechanical methods that focus on establishing crop trees rather than a broadcast treatment.

Motorized access into Silverdaisy is limited to authorized vehicles that are permitted and have a key to the locked gate that is located where the access road leaves Highway 3 at Cayuse Flats. BCTS also requires that access roads from the mainline to the blocks be deactivated upon completion of the Timber Sale Licence (TSL). The main road through the area services the mineral claims in Silverdaisy so BCTS cannot require permanent deactivation of this road. The level of deactivation of the main road will be dependent on exploration activity associated with the mineral tenures in the area.

As you mentioned in your letter, 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.

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 TSL in Smitheram Creek was awarded in 2015 and the licensee has been 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.

Barry J. Janyck, Executive Director

Several 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. Each 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 Operational Plans to stakeholders, First Nations, and agencies within the ministry for review and comment. The Operational 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.

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,



Chris Stagg
Assistant Deputy Minister

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