



February 18, 2013

BC Forest Practices Board
Box 9905, Stn. Prov. Govt.
Victoria, BC, V8W 9R1

Attn: Al Gorley, Chair

Here are comments on behalf of the North Columbia Environmental Society (NCES) re your report concerning the biodiversity amendment of December, 2011 to the Revelstoke Higher Level Plan Order (RHLPO).

First Question:

To address our first concern that biodiversity would be negatively impacted by the amendment, you posed the question: How will the amendment affect biodiversity conservation?

Although your finding that “On balance, although there will be less older forest retained overall, the amendment will not substantially affect biodiversity conservation as originally provided by the RHLPO.” is reassuring, there remain some concerns which I do not think were addressed or were not addressed sufficiently. I recognize that these shortcomings may be wholly or in part due to the constraints of the mandate of the Forest Practices Board. However, I state these concerns as I feel they are relevant to the problem of biodiversity in this valley and it is my hope that some of these comments may be able to be incorporated into your report and if not, be used in some manner. It seems to us that we are limited in means to make our concerns known in an effective way. (You have addressed this in your response to the second question posed.)

The concern remains that biodiversity as originally provided by the RHLPO is not sufficient to maintain healthy biodiversity today. The RHLPO was the result of local people in Revelstoke requesting to do their own land use plan rather than just being part of the Kootenay Boundary Land Use Plan. It is my understanding that while this was in recognition that this valley is unique and therefore deserved its own plan, rather than increase biodiversity provisions, there was less provision for biodiversity in the RHLPO than the Kootenay Boundary Land Use Plan. The RHLPO was worked out in the late 1990s and was complete by 2001 I believe. At this time, Revelstoke was primarily a logging town. Since then, the economics and social demographics of Revelstoke has changed drastically. Revelstoke Mountain Resort,

a world class ski resort, opened in 2007, snowmobiling ,with new technology which can do steeper terrain, has increased exponentially, and mountain biking, heli-cat skiing and Xcountry skiing are not far behind. Tourism locally is now at least as big as the logging industry and promises to surpass logging by far in the future. The RHLPO was socially constructed and historically located (as is every plan), but this was a more local construct and reflected mostly a logging town. If it were done today, I would venture to say, if the major stakeholders in the forest were present at the planning table from the beginning, that the plan would look significantly different and so would any amendment. Biodiversity or conserving much more old forest would be a higher priority for the forest practices other than logging. Therefore, I would posit this situation as one major reason why the RHLPO is out of date.

Another reason why we do not think this to be an appropriate amendment, is the net loss of "...2533ha of older forest - almost all within intermediate and high BEO connectivity corridors in the lower elevation Interior Cedar Hemlock (ICH) zone – are now vulnerable to harvest. These areas are not replaceable within either the GAR area or the inoperable land base. If harvested, the result will be a "reduced and further fragmented amount of lower elevation forest available to contribute to ecosystem connectivity". (Lines 145 - 147 spoke to the original RHLPO distinctive provision in connectivity corridors and lines 156 -166 speak to the impact of the biodiversity amendment.) Further, some caribou habitat in the operable forest previously protected by the RHLPO requirements for biodiversity may now be logged. If it is logged, caribou recovery may become more difficult. (lines 186-189; 201-202). This is a serious problem to us as caribou are already struggling with continuing declining numbers indicating more not less caribou habitat needs to be protected if one wants biodiversity. Mountain caribou may be extirpated from this landscape affecting thirteen other co-occurring species.

Biodiversity for any particular ecosystem is difficult to define. However, we have emphasized the unique nature of this valley, that it is an Inland Temperate Rainforest, perhaps the only one on the planet. Therefore, its biodiversity is also unique. Mountain caribou for example are found nowhere else on the planet. Lichen s never before identified, were recently discovered in the Incomappleux Valley. Fewer forest fires allow ancient forests to develop. This begs the question, what else is here which has yet to be discovered? If we cut much of the remaining old growth, we will never know what these ancient areas are harbouring. The Biodiversity Handbook of the Forest Practices Code, current government policy and legal direction for biodiversity in other nearby forests districts were used as guides for achieving biodiversity standards for this amendment. (lines 88-98; 135-138; 141-143; 193-194).

There are several assumptions here:

First assumption: that these policies and guides are effective. Since there has been no mechanism to monitor or assess the effectiveness of either the original RHLPO or its subsequent amendments as to whether they actually achieve biodiversity conservation, (lines 191-193), then the MFLNRO continues to operate in the dark and could be doing irreparable harm to the biodiversity of the Inland Temperate Rainforest. The fact that mountain caribou, which are listed as provincially endangered and federally threatened, continue to decline is evidence that the plan in place is not working.

Second assumption: that these policies for forests elsewhere in the province – even nearby forests - will apply to the Inland Temperate Rainforest. Even the next valleys on either side of the valley between the Monashee and Selkirk Mountains of the Columbia Valley north and south of Revelstoke (which comprise most of the Inland Temperate Rainforest) are different. We think that a biodiversity standard should be developed uniquely for this Inland Temperate Rainforest, recognizing its unique biodiversity and position in the world.

The NCEIS is grateful for your detailed presentation with maps to explain the process of change to arrive at the biodiversity amendment in question. We are very appreciative of this effort and finally feel that we understand what happened. It is complex and fairly inaccessible for people who do not have a forestry background. However, if we had been involved from the beginning as the forest licensees were, we would have had no problem understanding what was going on in our view. We also think other stakeholders or users of the forest, besides the environmental organization, such as motorized recreation, the heli-cat industry, and the public in general who camp, hike, back country ski and commune with nature for their health and well being should have been at the table from the beginning.

Second Question:

We agree in large part with the finding of the report on the second question around consultation.

We would add however, that there should be a body comprised of all of the above stakeholders to make the final decision about such an amendment. As it is, the area executive director of MLNRO made the decision at his discretion. This seems to us to be a process which was mostly done within one government department, the MLNRO, and we do not think this is appropriate any longer, as the forest has many functions – not just of forestry.

Third Question:

We think the finding re the third question, that social, economic and environmental impacts were properly evaluated is accurate within the parameters with which they were considered. However, this would be qualified by lines 338-340 pointing out how environmental conditions and social choice decisions made in land use planning do not remain static.

A further qualifier to the evaluation being done properly would be its insufficiency. The Land Use Objectives Regulation (LUOR) does not provide details re how to assess social, economic and environmental benefits or implications. Thus it is left to the discretion of the approving official. (lines 304-306). We think this is inadequate despite the consideration of information listed (lines 312 – 319), which are only concerning the RHLP's provision for an amendment should the caribou retention impact timber supply, and other documents addressing only logging concerns.

However, as stated above, we think that the economic and social situation of Revelstoke has changed greatly and logging is no longer the main consideration either socially or economically. This has led to our request for changes in process for both consultation and decision making to a much broader and more comprehensive approach.

We also still feel that the environmental dimension of this trio of values has been seen through almost a single lens – that of the forest industry. We think that the mountain caribou recovery plan of 2007 was already a compromise from 33,000ha to 10,000ha, which is not enough for mountain caribou recovery. Further, we think that a net loss of about 2600ha of older forest particularly in low elevation ICH and in animal corridors is a further weighting of decisions in favour of the economic (understood rather myopically as forestry) at the expense of the environmental. The guides used for these decisions are also narrow in scope and biased to the forest industry in our opinion. (lines 308-319). Again it is not suitable to have the final decision on this type of question, which is largely a value judgement, to be left to one individual from one sector.

Overall, we think that it is time for a new land use plan for the Revelstoke area which would address not only logging but also current scientific knowledge, current environmental issues such as climate change, loss of species and habitat, and the fast changing social and economic situation in the Revelstoke area. At the same time any land use plan would need to explicitly protect and conserve features unique to being in the Inland Temperate Rainforest.

We agree wholeheartedly that ongoing monitoring and assessment mechanisms for biodiversity need to be in place in any land use plan.

We want to thank the Forest Practices Board for the even handed and conscientious work on this complaint. We understand the limitations of the Board's mandate and any comments are made in that context.

Thank you.

Virginia Thompson, MSW EdD

North Columbia Environmental Society