ELECTORAL AREAS

A GOLDEN-COLUMBIA B REVELSTOKE-COLUMBIA C SOUTH SHUSWAP D FALKLAND-SALMON VALLEY E SICAMOUS-MALAKWA

F NORTH SHUSWAP-SEYMOUR ARM MUNICIPALITIES:

GOLDEN REVELSTOKE



781 MARINE PARK DRIVE NE BOX 978 SALMON ARM BC V1E 4P1 TEL: (250) 832-8194 FAX: (250) 832-3375 TOLL FREE: 1-888-248-2773

FROM THE DESK OF THE DIRECTOR, ELECTORAL AREA 'B'

December 21, 2012

FILE: 0420 20 25

Al Gorley, Chair and Board of Directors Forest Practices Board 3Rd Floor 1675 Douglas St PO Box 9905 Stn Prov Govt Victoria BC V8W 9R1

SALMON ARM

SICAMOUS

RE: Begbie Bench/Begbie Falls

Please acknowledge this correspondence as a formal letter of complaint regarding Stella-Jones' harvesting plans in the Begbie Bench/Begbie Falls area without adequate public involvement by the residents of Revelstoke and Area B and a request that an investigation take place regarding the proposed clear-cut logging by Stella-Jones of a recently completed Fire Smart Demonstration Project in the same area.

Some harvesting has already commenced.

The following is a brief history of past planning for the area leading up to date:

Due to public concern regarding logging in the Begbie Falls area in 1990 the Begbie Falls Planning Committee was formed to reach consensus on a plan for harvesting in the area while taking all other resource use into consideration.

The Begbie Falls Integrated Resource Plan (BFIRP) was completed by consensus and approved by the Ministry of Forests in 1993 after a two year planning process and consultation with the public.

After the plan was completed, the Committee met annually to review the Annual Report or as issues arose that needed committee input. [Some committee membership changed over time however a representative from Revelstoke City Council and the CSRD Area B Regional Director remained as general public representatives].

Some of the issues were:

- Motor vehicle closure for wildlife purposes.
- Reviewing the Mt. Begbie Recreational Improvement Association plans for the Begbie Falls vicinity.
- Discussions regarding Visual Quality Objectives.
- Reviewing and commenting on Bell Pole's 5 Year Development Plans.

Since the plan was approved, Bell Pole [now Stella-Jones] had no plans to log the area and only suddenly decided this year to include the area for logging. My understanding from Stella-Jones is that they need to meet their 5 year Cut requirement and had no other area to harvest at this time. Operations have commenced.

Over the course of time legislation changed and the BFIRP was not included in the Higher Level Plan [LRUP] thus making it a non-legal document. However, due to the high recreational, visual, and wildlife values Stella-Jones has refrained from harvesting until this winter.

While there is no longer a legal requirement to follow the plan there should be a moral component to harvest the area [at the very least] according to the plan. Since the plan was approved public use and recreation has increased exponentially and this needs to be taken into consideration.

Revelstoke Mountain Resort is directly across the valley from the Begbie Falls Area and visual quality from the Resort will be negatively impacted if the current harvesting plan is implemented.

Currently there is no requirement for a public consultation process and Forest Companies are not required to send referrals to local government regarding plans to harvest in locations near communities or in areas of special interest such as Begbie Falls.

However "stakeholders" still needed to be advised. The Revelstoke Cycling Association [they have tenure for their trails] and First Nations were contacted directly and made aware of the plan to log but the general public was largely unaware until recently.

In the BFIRP plan there were various harvesting techniques including clearcut [up to 5 hectares], single tree selection, patch selection and a combination of single and patch.

The current plan is vastly different from the BFIRP.

The current plan is to log only by clearcut with 5 hectare clearcuts to the south and 15 hectare clearcuts to the north of the falls. On page 21 [5.2] of the BFIRP Public Responses requested no harvesting at all north of the falls.

I became aware of plans to harvest when I attended a Wildfire Committee Meeting in Revelstoke on October 17th 2012. A Fire Smart project was just completed in the area now slated for clear cutting this winter. This area was chosen for the Demonstration Project as it has a high level of public use. The project, approved by the Ministry of Forests, Range, and Natural Resource Operations, took 5 weeks [at 30 hrs per wk] with 20 members of the BC Wildfire Branch fire fighting crew.

I was dismayed to hear that this highly valued project would be clearcut. There were several public meetings about it's benefits to the community.

After hearing of the plan I contacted the MFLNRO to inquire about the aforesaid and I also inquired about whether Stella-Jones was adhering to the BFIRP. I was told that they were unaware that Stella Jones was going to harvest the area when they gave the permit for the Fire Smart Project [just completed] and that Stella-Jones was not following the BFIRP. Further, that the Ministry was not required to direct them to follow it due to legislative changes.

Following that conversation I contacted Stella-Jones and was informed that as the BFIRP was redundant they had no intention to implement the plan or consult with the public. They said they were only obligated to consult with "stakeholders" and that included the Revelstoke Cycling Association [as they have tenure] and First Nations.

I was also informed that their harvesting plans were very recent and that they were unaware of the Fire Smart project until they cruised the planning area prior to laying out road right of ways.

I raised the issue at the CSRD Revelstoke and Area Economic Development Commission and a request from the Commission to Stella Jones resulted in a public meeting/open house being held on November 16th from 3-7pm to advise the public of their plan for harvesting. At the open house it was made very clear that they were not going to engage the public to update the BFIRP or any other planning process, that they will be harvesting according to current practices, and that there would be no changes made to their plan.

Forest Companies must take values other than timber harvesting into consideration when developing their plans.

The Begbie Falls Area has significantly high values for recreation, wildlife, and due to the high volume of public use it perfectly situated to showcase alternative forest practices for multiple use activities and demonstration projects such as the Fire Smart Project just completed.

Given the negative response received from Stella-Jones I brought the issue the Board of Directors of the Columbia Shuswap Regional District. The Board unanimously agreed to send a letter to Stella-Jones requesting that harvesting be delayed until a revised BFIRP is in place, that a letter be sent to MFLNRO requesting that the Ministry recognize the BFIRP as well as other LRUP's made redundant by current legislation, and that harvesting plans near communities in areas that have high multiple use values be referred to Local Government.

Stella-Jones responded by letter to the CSRD Board that they will continue with their current plans and the cutting permit was issued. Further to receipt of the letter the Board of the CSRD voted [again unanimously] to send a letter to the Minister of FLNRO requesting that the permit be rescinded until an investigation takes place regarding the issues of clear-cutting the recently completed Fire Smart Project, a revised BFIRP is in place, and copies of the request be sent to the Forests Practices Board.

To date we have not yet received a response from MFLNRO.

I have had many calls and I am in receipt of many letters from the concerned public regarding this issue. [I have only attached one from the Community Futures Development Corporation of Revelstoke and also one from the North Columbia Environmental Society].

I am requesting that the Forest Practices Board investigate and, due to the high values and significance of this area to the public, appeal the issuance of the Cutting Permit in the Begbie Falls Area to Stella-Jones.

December 21, 2012

Forest Practices Board

Thank you in advance for your consideration of this matter.

Following is the contact information for Stella-Jones and MFLNRO

Stella-JonesAshley Ladyman: Woodlands Manager4661 60th St SEColin PikeSalmon Arm BC250 832 1180V1E1X2www.stella-jones.com

MFLNRO Columbia Forest District Kevin Lavelle: Stewardship Officer 1761 Big Eddy Road PO Box 9158 RPO 3 250 837 7628 V0E3K0 Forests.ColumbiaForestDistrict@gov.bc.ca

My Contact Information is:

Loni Parker: Area B Director, Columbia Shuswap Regional District

Home Office Contact:	CSRD Office:
PO Box 1139	PO Box 978
Revelstoke BC	Salmon Arm BC
V0E2S0	V1E4P1
250 837 5804	250 832 8194
lparker@csrd.bc.ca	

Regards COLUMBIA SHUSWAP REGIONAL DISTRICT Per:

al

Loni Parker, Director Electoral Area 'B'