



RE: Response to request for Public Comment (10/21/18) on Proposed District Timber Sale Plans in the Silver Daisy-Twenty Six Mile area

December 20, 2018

Dear Qingcen Cai,

We request a stop work order on logging in the Silver Daisy-Twenty Six Mile Creek area, otherwise known as the “doughnut hole”. Such action will allow government ministries, First Nations, the Skagit Environmental Endowment Commission (SEEC) and stakeholders to develop a plan and timetable that can incorporate the area in to Manning/Skagit Valley Provincial Parks and removed from the Timber Harvesting Land Base.

We are concerned and puzzled that BCTS is logging in the area given the years of ongoing negotiations between the SEEC, BC Parks and Imperial Metals (Giant Copper) to acquire the mineral claims within the doughnut hole and transfer the lands to the BC Parks system; and that government is aware of these interests and has encouraged the dialogue over the years.

The watersheds in question have long been of conservation interest to the Skagit Environmental Endowment Commission, BC Parks, First Nations, scientists and conservation NGOs for decades for their superior conservation and water quality, recreational and aesthetic values and most importantly their location. The Manning and Skagit Parks complex is one of BC’s crown jewels and headwaters of the Skagit watershed.

We are concerned that the disruption caused within and around the park by traffic from logging trucks, increased access, degradation of the greater watersheds and potential impacts to fish and wildlife like salmonids and grizzly bears is inconsistent with BC Parks mandates and the interests of tourists and local communities.

This area is important for grizzly bear recovery in the North Cascades.

The BC Auditor General highlighted the Critically Endangered North Cascades as BC’s only Grizzly Bear Population Unit (GBPU) with a recovery plan. The area in question has significant high suitable grizzly bear habitat. Further degrading that habitat with new roads and increased cumulative effects poses the risk that the habitat effectiveness of the GBPU generally is also degraded.

BC Timber Sales should provide a good example of appropriate logging from geographic, operational and sustainability standpoints. Logging in the Silver Daisy-Twenty Six Mile area fails on all counts.

We respectfully request that you issue a stop work order and initiate a process to fill in the donut hole with ecologically sustainable activities geared toward wildlife habitat and primitive recreation.

Sincerely,

A handwritten signature in black ink, appearing to read "Johnny Mikes".

Johnny Mikes
Field Director
Coast to Cascades Grizzly Bear Initiative

A handwritten signature in black ink, appearing to read "Joe Scott".

Joe Scott
International Programs Director
Conservation Northwest