



Sunshine Coast
Conservation
Association

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Chair, Community Forest Advisory Committee
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July 5, 2005

Dear Chair and Members of the Community Forest Advisory Committee,

I am writing on behalf of the Sunshine Coast Conservation Association (SCCA), representing over 25 community and conservation groups on the Sunshine Coast. The purpose of this letter is to bring your attention to some serious concerns with the District of Sechelt's (DoS) application for a Probationary Community Forest Agreement (PCFA).

It appears that the applicant may have:

- I Restricted public involvement
- II Left out significant and available information
- III Misrepresented the level of public support

The SCCA is a strong supporter and advocate for community forestry and have made persistent and constructive attempts to communicate our input to the applicant, to no avail. The SCCA has an interest, as does CFAC and many BC communities, in a fair open and legitimate application process. A "community" forest license should never be imposed against the will of the affected public. The awarding of Community Forest License should represent a culmination of consensus building and cooperation. We respectfully submit for your consideration the following points of information and perspective.

I. Restricted Public Involvement

- i. The DoS application was originally submitted to the Ministry of Forests *before* being released to the public.
- ii. The DoS application was prepared by a private consultant with very limited input from the community.
- iii. The application was only made available after requests were directed to the Ministry of Forests by local governments, community groups and the public.
- iv. Requests to review background information on the DoS application have been denied.

- v. Refusal of applicant to provide background information has resulted in a series of Freedom of Information (F.O.I.) requests.

II. Critical Information Missing

The DoS application omits a substantial amount of information and correspondence from the following sources:

- i. Local governments
 - Both the Sunshine Coast Regional District (SCRD) and the Sechelt Indian Band (SIB) identified serious concerns with the process and the land included in the proposal. The Town of Gibsons declined to endorse the application. These facts were missing from the application. *(For a detailed summary of local government concerns, please see Endnote #1).*
- ii. Local media reports
 - Numerous reports of serious public opposition to the application were identified by local media but missing from the application. *(For a link to articles from the Coast Reporter, please see Endnote #2).*
- iii. Community groups
 - Numerous letters from community groups sent to, or copied to the Ministry of Forest and/or the DoS. *(For a complete list of correspondence from community groups, please see Endnote #3).*
- iv. Sunshine Coast Conservation Association Correspondence
 - Correspondence between the SCCA and the applicant outlines the Association's attempts to have issues addressed. *(For a complete list of correspondence between the SCCA and the DoS, please see Endnote #4).*
- v. General public/Individuals
 - Input generated at the "public meetings" was missing from the application as was any reference to numerous letters from individuals opposing the application. *(For a brief summary of general public input, please see Endnote #5).*

III. Alleged Misrepresentation of the Level of Community Support

- i. The application claims that the "majority of the comments in the community [about the application] are positive" (p.4), and further that "there is both substantive and broad based support for the application" (p.20).
 - These statements are at best unsubstantiated, at worst contradictory, and possibly even misleading in the absence of any reference to the missing information noted in paragraph II (Critical Information Missing).

- ii. The applicant points to a survey conducted by the local newspaper, the *Coast Reporter* which showed “85%” public support.
 - The “public support” was simply for the “concept of community forestry”.
 - The “survey” is unscientific and should not be used as an attempt to reflect real support.
 - The “survey” had 17 respondents.
 - The “survey” was conducted prior to the release of the application to the public.
- iii. The applicant provides letters of support from the community.
 - Of the six letters, one was from the Sunshine Coast Forest Coalition chairman who is also the consultant hired by the District of Sechelt to prepare the application.
 - The letter from the Town of Gibsons endorses only the concept of the Community Forest.
 - The letter from the Community Futures Development Corporation also endorses the concept of the community forest. It was written a day *before* the consultant stated in a public meeting that “no application has been prepared.”
 - No letter of support was received by any First Nations representative, regional government, community association or conservation association.
- iv. The applicant fails to indicate that public meetings indicated serious concern among the public over numerous aspects of the application. ***(Please see: Community Forest Draws Criticism” and “Application Submitted Despite Opposition” included in Endnote #2.***

From our perspective, the DoS must revise their documentation of community awareness and support to provide a more accurate account of broad spectrum of support and concern for the application. In particular, the opposition by the regional district must be addressed as this is a major barrier to the success of the PCFA.

In closing, I want to highlight again that the SCCA is a strong supporter of the community forest concept and our member groups are willing and able to work to that end. Our goal is not to “stop the application from being approved” as the DoS application suggests, but rather to ensure that a community forest proposal is legitimate, reflects the expressed will of the public and serves the interests of the community as a whole.

Respectfully submitted,

Daniel Bouman
Executive Director

Endnotes

#1. Local Government Concerns

a) Correspondence

- March 2, 2005 letter from the SCRDC to the MoF (copied to DoS), requesting a 60-day delay postponement of the application deadline.
- March 11, 2005 letter from the Sunshine Coast Regional District (SCRDC) to the MoF and copied to the DoS. Letter highlights that the SCRDC “has strong concerns about the application given the lack of public consultation”. The letter also highlights that “the SCRDC vigorously opposes the granting of any tenure that would allow resource extraction in the Chapman-Grey watersheds”.
- March 15, 2005 Letter from the Sechelt First Nation to the DoS states that the SFN can not support the application at this time due to concerns with the area identified in the application.

b) Resolutions

- February 24, 2005 SCRDC Resolution 110/05 Recommendation No. 4.
- March 10, 2005 SCRDC Resolutions 126/05 Recommendation No. 7.
- May 12, 2005 SCRDC Resolution 306/05 Recommendations No. 6-8. For example, Recommendation 6 states: “THAT the SCRDC Board is strongly opposed to the granting of any community forest tenure in the Chapman Gray watershed and that this opposition be strenuously and vigorously communicated to the Ministry of Forests and to all Governments on the Sunshine Coast”.

#2. Local Media Reports

- ‘*Community Forest Draws Criticism*’. Nancy Moote, *Coast Reporter*. April 22, 2005. <http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/5f19d1aaf0f5e80888256fea0078961b?OpenDocument>
- ‘*Land Base Officially Identified.*’ Christine Wood, *Coast Reporter*. April 1, 2005 <http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/cfe429795fd4e30788256fd50082fb04?OpenDocument>
- ‘*Application Submitted Despite Opposition*’. Nancy Moote, *Coast Reporter*. March 18, 2005. <http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/a3641177537191bd88256fc700820ca7?OpenDocument>
- ‘*More Discussion Needed*’. Ian Jacques, *Coast Reporter*. March 18, 2005. <http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/d8e70c8ae062ee7e88256fc7008267e8?OpenDocument>
- ‘*Community Forest Creates Controversy*’. Nancy Moote, *Coast Reporter*. March 4 2005.

<http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/e7bdd165f9c2b97e88256fb9007b31b9?OpenDocument>

- *'Community Gets a Closer Look at Forestry Project'*. Christine Wood, *Coast Reporter*. February 4, 2005.
<http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/b6227ada4ad4bf2a88256f9e000621bb?OpenDocument>
- *'Community Forest Tenure Closer'*. Christine Wood. *Coast Reporter*. August 14, 2004.
<http://www.coastreporter.net/madison/WQuestion.nsf/8e3a5e5ec0efcdb988256bf9005bf979/dc9ef8112286c3f888256eef00728c22?OpenDocument>

#3. Community Groups

The following groups have expressed their objections to the District of Sechelt's application for the Community Forest and have copied the letters to the SCCA:

- Carlson Point Property Owners Association
- Gibsons Residents Association
- Pender Harbour & District Wildlife Society
- Roberts Creek Official Community Plan Commission
- Roberts Creek Community Association
- Sandy Hook Community Association
- Sechelt Community Associations Forum
- West Porpoise Bay Community Association

Two other groups also objected to the application in letters sent to the Minister of Forests and the DoS without a copy to the SCCA: The Tuwanek Ratepayers' Association, and the Elphinstone Electors' Association.

#4. Sunshine Coast Conservation Association Correspondence

November, 2004: Letter to DoS with a statement of Community Forest Principles attached. **Response:** *Awaiting response.*

March 4, 2005: Letter to DoS requesting more info and delay of application submission. **Response:** *Awaiting response.*

March 11, 2005: Letter to Minister cc'ed to DoS requesting delay in consideration of application. **Response:** *Awaiting response.*

March 29, 2005: Letter to Coast Reporter re: misinformation in DoS advertisements.

April 5, 2005: Letter to DoS asking how the watersheds came to be included in the Community Forest Initiative. **Response:** *Awaiting response.*

April 28, 2005: Letter to BC Community Forest Association asking for assistance with the DoS application,

June 24, 2005: Series of formal FOI requests to the DoS, MoF Minister's office, Minister of State for Forestry Operations and District MoF office. **Response:** *Awaiting response.*

January, 2005 and June, 2005 editions of the *SCCA Newsletter* feature full page articles about getting the Sechelt PCFA proposal back on track. (available at www.thescca.ca)

#5. General Public/Individuals

a) Correspondence

At least 11 letters from community members were sent to the DoS to express opposition to the application due in part to the lack of true consultation.

b) Meetings

February 8, 2005

No summary included in application.

April 19, 2005

No summary included in application. Over 100 people attended. Almost every speaker voiced objections to the application.