

File: ORCS 10285-20-KARST

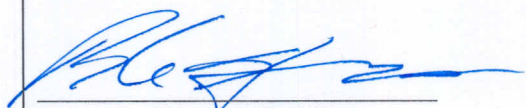
Order to Identify Karst Resource Features

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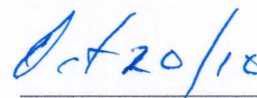
Sunshine Coast Forest District

Pursuant to Section 5 of the *Government Actions Regulation of the Forest and Range Practices Act* (FRPA), I hereby identify the following surface or subsurface elements of a karst system as resource features wherever they are found within the Sunshine Coast Forest District (SCFD), effective September 30, 2010.

- Karst caves
- Significant surface karst features
- The important features and elements within very high or high vulnerability karst terrain



Brian A. Hawrys, R.P.F.
District Manager
Sunshine Coast Forest District



Date

**Determination Rationale for the
Order to Identify Karst Resource Features in the Sunshine Coast Forest District**

Authority:

Authority has been delegated from the Minister of Forests and Range (MFR) to the applicable District Manager of MFR to identify resource features under the *Forest and Range Practices Act* (FRPA) and section 5(1) of the Government Actions Regulation (GAR).

Planning Context:

Karst resource features are identified as a value to be managed in the *Government Actions Regulation* (GAR section 5(1)(a) Resource Features) and currently do not have protection under FRPA. The purpose of this Order is to achieve a reasonable level of management that will protect and conserve the resource from forest & range practices. Previous karst management consisted of knowledge and awareness through publications, policy and education from 1994 onward and operationally resulted in special management plans being implemented for block and road development. There are a number of unique values found in karst landscape features. Currently, Karst GAR Orders have been established in five Coast Region districts where karst features have been identified.

GAR Legislation Tests:

GAR sections 2(1)(a): the order is consistent with established objectives

Eight Landscape Unit plans have been established in the Sunshine Coast Forest District. There are Old Growth Management Areas (OGMA) drafted for five other Landscape Unit Plans. There are no known inconsistencies between the Landscape Unit order and this order. Future OGMAs may be able to be co-located with identified Karst features.

GAR section 2(1)(b): the order would not unduly reduce the supply of timber from British Columbia's forests

The overlap of karst potential areas within the Sunshine Coast Forest District is less than 5% and in that area the potential of finding karst features ranges from moderate to high. Only a small subset of this area is expected to meet the criteria for management under the Karst GAR Order (karst caves, very high or high vulnerability karst terrain and significant surface karst features).

It is expected some karst resource features within the THLB will be managed on part through other existing constraints, e.g. draft OGMAs and WHAs. Agreement holders may also have the opportunity to lessen the potential impact through the placement of wildlife tree patches during operational planning.

Note: Karst was not netted out in the Sunshine Coast TSRIII data package n or any recent FTL, CFA or WL Management Plans.

GAR section 2(1)(c): the benefits to the public derived from the order would outweigh any;

- 1. Material adverse impact of the order on delivered wood costs of a holder of an agreement under the Forest Act that would be affected by the order, and**
- 2. Undue constraint on the ability of a holder of an agreement under the *Forest Act* or the *Range Act* that would be affected by the order to exercise the holder's rights under the agreement.**

Operational experience has shown there would likely be an insignificant impact to the THLB under this order. It is expected that the small percentage of karst resource features within the Sunshine Coast Forest District would be managed using conventional practices and overlapping constraints. The intent is to minimize access restrictions to the highly productive timber growing sites.

Public values and benefits include potential cultural values in or around caves, karst springs or other karst resource features. Food, medicine or large trees for First Nations cultural uses may also exist in the highly productive sites in which karst resources occur. Other values include mineral values, scientific & educational opportunities, and recreational uses.

No specific concerns over delivered wood costs have been brought forward by affected agreement holders under the *Forest Act* during the review and consultation period. Information on the general location of some karst cave features is available through the Geographic Warehouse (formerly known as Land Resource Data Warehouse). Additional specific information is not currently available.

GAR section 3: Consultation and review

Agreement holders under the *Forest Act*:

This order covers the Sunshine Coast Forest District, therefore communication efforts were directed to the agreement holders who have interests within the area covered by the order.

Prior to the review and consultation period, information was provided on the Karst GAR order and an opportunity was made available to discuss the development and implementation of the order. One agreement holder provided comments and stated a preference for a change in the wording. The suggested change is minor and will ensure the order is consistent with recently approved orders near the Sunshine Coast Forest District. The revised wording adds "The important features and elements within" to the phrase "very high or high vulnerability karst terrain." This modified wording will ensure a consistent approach for licensees who have operations across a wide region. The change is minor and does not justify additional referrals and advertising.

A 60 day review and consultation period was initiated with agreement holders in the Sunshine Coast Forest District on June 15th, 2010.

First Nations:

First Nation groups with interests in the Sunshine Coast Forest District were contacted specifically in regards to this order. No concerns pertinent to this order were identified.

Caving Community:

The caving community was provided the opportunity for input via newspaper advertisements. Numerous e-mails from Texada Island residents support the establishment of this order. The well know karst proponent Paul Griffiths provided input in the development of this GAR order.

GAR section 5(2): Special management required

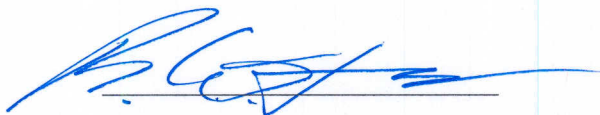
Karst resource features include unique biological, cultural, social and economic aspects. Protection of the features covered by this order from forest and range practices is not provided under existing legislation and is limited to other values or constraints that may overlap some of the features. Since specific locations of karst resource features have not been spatially identified, management of karst values through other overlapping resource designations or approved plans maybe a concern to the protection of these unique features.

GAR Order Implementation / Interpretation:

Appropriate application of this order relies on the professional judgement of foresters and appropriate karst experts. Guidance is available through the Karst Management Handbook for BC (May, 2003) and Karst Inventory Standards and Vulnerability Assessment Procedures (January, 2003).

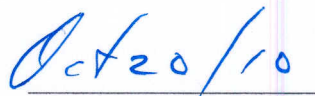
Determination

In consideration of the pertinent details related to this issue, and social and economic values applicable for this resource, I have concluded that karst resource features should be identified through a GAR Order. Accordingly, I will approve the "Order to Identify Karst Resource Features in the Sunshine Coast Forest District.



Brian Hawrys

District Manager
Sunshine Coast Forest District



Date

Summary of DSC GAR Karst Order

Process

- **Project Initiation:** May 2010
- **FN Letters** – Sent - June 7, 2010
 - August 15, 2010 due date for comment
- **Agreement holder letters** – Sent – June 7, 2010
 - No due date for comment mentioned in letter.
 - One licensee responded with wording suggestions.
- **Newspaper Notice** – Published August 4 and August 6, 2010
 - September 20, 2010 due date for comment.
- **Public Review and Comment Period** – Draft GAR Order for Karst was made available on June 7, 2010
 - Comments were taken until September 20th, 2010
 - Numerous support e-mails were received
 - One individual commented and followed up with a written submission discussing the potential of the order negatively impacting mining opportunities.