

Re: Sandy Hook Community Association, Sechelt B.C.

Private Managed Forests Administrative and Social concerns.

July 21, 2019

Sandy Hook is in Sechelt, B.C., adjacent to a recent Managed Forest Program (MFP) project. These comments are the results of discussion, review and agreement by the **Sandy Hook Community Association**.

Our comments about the MFP, based on our recent experience as well as general information available about the MFP at the recent meeting and websites, are:

1. The Private Managed Forest Land Act establishes several management objectives for key public environmental values but does not include any public interaction that might lead to creating a Social License. Because there is no requirement for Social License, concerns that include communication with adjacent residents and the Municipality where MFP is located next to built-up areas, there is a lack of communication between the participants in the Program (The Owner) and the local (adjacent) residents, and Municipality. These communication issues could include schedule, characteristics of cutting, and interface with adjacent properties, as well as environmental and municipal planning. It is our understanding that this has been a recurring issue with MFP, not just in our community, but at other locations as well. The Management Objectives should be expanded to include Social Licence values.
2. Whether the Program does this consultation and communication itself, or requires The Owner to provide evidence that The Owner has communicated with The Community and The Municipality, there should be certain requirements to develop credibility and trust, and develop Social License as well as satisfying the physical key public environmental values.
 - a. The nearby residents should be aware of the schedule for the cutting and replanting of the affected land.
 - b. The Owner should be required to provide setbacks, and / or other considerations to minimise the impacts of the operation and the inevitable eventual bare land.
 - c. There should be a commitment to establish a community Social License by positively responding to issues that affect the local community, address their concerns, and can provide public benefit.
 - d. The Owner should be required to complete a safety inspection by a professional arborist when cutting trees next to existing houses to ensure there are no danger trees left which could fall and damage neighbouring properties.
 - e. There should be a professional evaluation of the risk of soil erosion and landslides during extreme precipitation events (as a result of loss of root holding capacity) that could create damage to residences and properties downslope from the cut-block.

There should be a detailed checklist, or a professionally prepared report required to be prepared by a Communications Consultant that these issues have been addressed by The Owner. This should be distributed to concerned individuals or groups. It is important that projects adjacent to established built-up communities achieve a positive relationship and credibility with The Owner and The Ministry.

3. There should be a detailed follow-up that the logging, subsequent roads, and any other promised amenities are completed according to the Agreement. There should be evidence that there are no encroachments into adjacent property, either private or public (Parks for example), and that hazardous conditions (like slash piles and potential for trees to blow down onto neighbouring houses) do not exist.
4. There could be some alternatives to reforestation permitted to include changing the end use from forest to farming. This is consistent with the existing goals of sustainability, soil conservation, fish habitat, and preserves drinking water quality. In addition, farms provide local food, employment, and environmental benefits consistent with most of the goals in the PMF Land Act. On the Sunshine Coast and Vancouver Island it would contribute to our self sufficiency from nearly all food arriving by truck from all over North America (and beyond) by highway and ferry. We realize the property near Sandy Hook is likely too steep for a realistic farm, although there are some level parts. This might be considered by Council for more suitable sites.
5. Unless some mechanism is evolved for a more site-specific agreement that includes Social License considerations that respond to the significant impacts on residents, it must be questioned if the MFP is really workable in existing Municipalities at all! Uncontrolled logging at The Owners discretion (as exists now) is more suitable for more rural areas where established, relatively high-density neighbourhoods are not disturbed. Perhaps the MFP is not appropriate in built-up neighbourhoods without significant consultation and recognition of site-specific complexities that each site has. "One size" does not "fit all" in terms of the approval and supervision process! And of course, there has to be a follow up that and agreements are followed through, to maintain the credibility of the Program, and to maintain whatever Social License was created during the initial resident consultation.

Sand Hook Community Association.

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