



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

Keith Moore, Krista West  
Box 1029,  
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December 2, 2010

Dear FSC Colleagues:

**Re: Forest Management Certification Pre-assessment of Spray Lake Sawmills Ltd.**

Thank you for your email of November 15 2010, discussing the Spray Lake Sawmills (SLS) application for Forest Stewardship Council (FSC) certification for its FMA 0100038 and the associated B9 Quota area.

Alberta Wilderness Association (AWA) appreciates the opportunity to comment on the SLS application. While AWA believes that SLS's interest in receiving certification for their forestry operations is significant and desirable, we also believe their current standards of forestry operations are inadequate to qualify them for FSC certification. It is our hope that FSC certification, under your direction, will be a goal that they will work towards achieving but we are not comfortable supporting their application given current logging practices that are far from an ecosystem based approach. We believe that solid evidence of a number of significant changes would be required before SLS could be considered for certification.

AWA works throughout Alberta towards more representative and connected protection of Alberta's unique and vital landscapes that are the source of our abundant clean water, clean air and vital habitat for wildlife in each one of our six natural regions. We have been working in Alberta for more than forty years to raise the profile of Alberta's spectacular wilderness, and to help Albertans learn more about the value of our wilderness and wildlife, and participate in opportunities to protect and care for the legacy that we will leave for future generations. AWA is a member of FSC and we participated in the FSC certification process for Alberta-Pacific (AIPac).

AWA has a long-standing interest in Kananaskis Country and the Ghost Region in general, and in the Spray Lake Sawmills Forest Management Area. For many years, we have expressed concern that forest management in Alberta's southern Eastern Slopes (both the Spray Lakes FMA and the C5 Forest management region to the south) has had a disproportionate focus on timber harvest, at the expense of all of the other non-forestry values provided by healthy forests, including clean drinking water, recreation opportunities and wildlife habitat. AWA's August 2010 report, *The Forests of Alberta's*

*Southern Eastern Slopes: Forests or Forestry?* –

[www.AlbertaWilderness.ca/issues/wildlands/kananaskis/archive](http://www.AlbertaWilderness.ca/issues/wildlands/kananaskis/archive) - provides a comprehensive review.

AWA's concerns about current management of the SLS FMA include:

### **Management Priority**

*"A management plan -- appropriate to the scale and intensity of the operations – shall be written, implemented, and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated"* (FSC Principles and Criteria for Forest Stewardship. Principle #7: Management Plan)

Spray Lake Sawmills' *Detailed Forest Management Plan*: clearly states their priority as: "The primary use of the FMA is to **establish, grow, harvest and remove timber**" (emphasis added). This statement is in conflict with the Government of Alberta's own stated priority that "The highest priority (in the Eastern Slopes) is placed on watershed management to ensure a reliable supply of clean water for aquatic habitat and downstream users" (*Policy for Resource Management of the Eastern Slopes*, 1979). AWA believes that, without a concerted shift in management priority for the forest, SLS cannot qualify for FSC certification.

### **Protected Areas**

*"Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources"* (FSC Principles and Criteria for Forest Stewardship. Principle #6, Environmental Impact).

AWA does not believe that adequate land in the Spray Lake FMA is designated for protection and we are not aware of any plans SLS may have to address this.

### **High Conservation Value Forests**

*"Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach"* (FSC Principles and Criteria for Forest Stewardship. Principle #9: Maintenance of High Conservation Value Forests).

We have no indication that SLS enhances, or is planning to enhance High Conservation Value Forests.

During 2009 – 2010, AWA worked in conjunction with Herb Hammond of the Silva Foundation and the Ghost Watershed Alliance Society to commission a report on the state of the forests in the Ghost River watershed.

*"Planned logging focuses on removing the majority of white spruce forests of medium and good site quality. These are naturally rare or unique ecosystem types in the Ghost River watershed, and implementing these plans will significantly degrade the biological diversity and ecological integrity of the watershed."* - *Progress Report: Ghost River Watershed Ecosystem-based Conservation Plan*, May 2010. [www.albertawilderness.ca/issues/wildlands/south-ghost/archive/2010-05-29-ghost-river-watershed-ecosystem-based-conservation-plan/view](http://www.albertawilderness.ca/issues/wildlands/south-ghost/archive/2010-05-29-ghost-river-watershed-ecosystem-based-conservation-plan/view)

“Before planned logging occurs 19.5% of the area of the Ghost River watershed contains forests 101 + in age. After planned logging the area of old forests will have been reduced to 11.8%. These older age class forests will contain forests with oldgrowth attributes, which are the most complex, biologically diverse ecosystems in the watershed. Old-growth forests are non-renewable resources, and logging this successional phase where it comprises only a small percentage of the overall landscape degrades biological diversity and ecological integrity.” - *Progress Report: Ghost River Watershed Ecosystem-based Conservation Plan*, May 2010.

### **Public Openness**

*“Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations”* (FSC Principles and Criteria for Forest Stewardship. Principle #4: Community Relations and Worker's Rights).

While SLS has provided opportunities for public engagement, the opportunities for that engagement to be meaningful and inclusive are not apparent to AWA. We believe there has been little indication that comments made by the public and the environmentally community that are contrary to the plans made by SLS have been given serious consideration, or helped to influence future management decisions in any way.

For example, the May 2010 *Progress Report: Ghost River Watershed Ecosystem-based Conservation Plan*, prepared by Silva Ecosystem Services on behalf of AWA and Ghost Watershed Alliance Society (GWAS) states: “Both GWAS and Silva attempted to obtain digital data for past and planned logging from Spray Lake Sawmills and the Alberta government, but our requests were denied.”

Spray Lake Sawmills does have a “Public Advisory Committee” for the FMA, , but AWA believes the views of the broad environmental community are not adequately represented.

### **Operations**

To date, SLS operations in the FMA have been principally focused on large cut blocks.

*“Past and planned logging is done exclusively through clear-cutting. This system of logging has the highest negative impacts on composition, structure, and function of the forest, resulting in long-term loss of biological diversity and damaging the ecological integrity of the entire Ghost River watershed landscape ecology.”* - *Progress Report: Ghost River Watershed Ecosystem-based Conservation Plan*, May 2010.

### **Grizzly Bears**

The area of the SLS FMA falls entirely within a Core Grizzly Area as identified by the Alberta government (see map below).



Although the Government of Alberta’s March 2008 *Alberta Grizzly Bear Recovery Plan 2008-2013* clearly states that “human use of access (specifically, motorized vehicle routes) is one of the primary threats to grizzly bear persistence,” AWA has no evidence that SLS has done anything to adjust its operations to reflect knowledge of this fact.

**Westslope Cutthroat Trout**

Similarly, the Government of Alberta’s December 2006 report, *Status of the Westslope Cutthroat Trout in Alberta* states: “Timber extraction, mining and hydroelectrical developments have been responsible for substantial losses of westslope cutthroat trout habitat and the decline of several populations.” Although a joint federal-provincial westslope cutthroat trout recovery team is currently meeting, AWA has no evidence that SLS is planning to change operations to reflect sensitivity to critical habitat for Westslope cutthroat trout.

**Cumulative Impacts**

The Government of Alberta’s December 2008 *Land-Use Framework* report states “Our current land management system, which served us well historically, risks being overwhelmed by the scope and pace of activity... We have reached a tipping point, where sticking with the old rules will not produce the quality of life we have come to expect.”

Clearly, Spray Lake Sawmills is not the only industrial operator on the FMA landscape. A number of oil and gas companies also operate in the area, and while there may have been cooperation between SLS and the oil and gas operators, we are unaware of on-the-ground evidence of that cooperation.

Recreational off-highway vehicle activity is extensive across the landscape, and government of Alberta enforcement levels are inadequate. Motorized recreationists are known to have significant negative impacts on wildlife, water quality and on non-motorized recreationists in the region of the SLS FMA and operations.

We look forward to hearing from you and learning the results of your assessment. AWA believes FSC has the potential to set a high standard of sustainable ecosystem based forest operations for Spray Lake Sawmills and that if SLS accepts that challenge, there will be significant gain for our forest ecosystems.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'NDG', is positioned to the right of the typed name.

Nigel Douglas  
Conservation Specialist

cc: Honourable Mel Knight, Minister of Sustainable Resource Development  
cc: Gord Lehn, Woodlands Manager, Spray Lake Sawmills  
cc: Dr. David Swann, Alberta Liberal Party leader  
cc: Brian Mason, Alberta NDP Party leader  
cc: Paul Hinman, Wild Rose Alliance  
cc: Rick Blackwood, Assistant Deputy Minister, Fish and Wildlife