

Johnstone

Strait

Robson Bight

Lower Tsitika River Park

Tsitika Mountain Ecological Reserve

Mount Derby Ecological Reserve

BCTS Old Growth Cutblock TA 1375

- Active Forest Service Roads
- Areas subjected to Industrial Logging
- TAP Priority Deferral Areas

0 1.5 3 6 Kilometers







MAP 1

Applied Conservation GIS  
2026-04-08

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Sources: Esri, © World Wildlife Fund, Inc., Sources: Esri, Vantor, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geo

Tsitika Mountain Ecological Reserve

Lower Tsitika River Park

-  TA 1375 REVISED Cutblock
-  CDC \* BLUE Listed Ecosystems
-  TAP \*\* 'Ancient' Forest
-  TAP \*\* 'Big Tree' Forest
-  Tsitika proposed WHA (or extension to Tsitika Mountain Ecological Reserve)
-  New Roads









\* BC Conservation Data Centre  
\*\* BC Govt appointed Technical Advisory Panel

**MAP 3**

Tsitika Mountain Ecological Reserve




Lower Tsitika River Park

300 meter ARU audio recording distance

-  Revised TA1375 Cutblock
-  New Roads
-  Bear Den
-  Marbled Murrelet ARU location
-  Potential legacy trees
-  Large Cultural Cedars
-  OG Specklebelly Lichen locations (identified on iNaturalist)
-  Oldgrowth Specklebelly Lichen locations identified by BCTS

Tsitika proposed WHA (or extension to Tsitika Mountain Ecological Reserve)

Marbled Murrelet Habitat

-  High Quality
-  Moderate Quality
-  Suitable

MAP 2

## **Appendix: Upper Tsitika Valley TA1375**

### **At-risk Species**

#### *Marbled Murrelets (MAMU)*

One ARU (autonomous recording device) placed adjacent to the eastern boundary of the lower cut block recorded approximately 300 MaMu flying overhead, out of an estimated 648 previously documented to frequent the watershed (see Thomas et al. 2015<sup>1</sup> for more on ARU protocol for documenting murrelet presence). The ARU recorded audio to a distance of approximately 300m (therefore likely underrepresenting total murrelet numbers), and captured the vocalization of murrelets as they were flying overhead, including circling, indicating that the cut block is likely a critical nesting area as well as a flyway for this at-risk species. BCTS states that it has met MAMU nesting habitat management requirements in the region, but has not provided the substantiating documentation for this, nor for their statement that “the boundaries of TA1375 overlap 1.3 ha of provincially modeled moderate suitability nesting habitat but it does not overlap with nesting habitat identified to meet BCTS’ aspatial target in the Tsitika LU.”<sup>2</sup>

The MaMu is federally listed as threatened under Schedule 1 of SARA and is provincially blue-listed (BC CDC 2015). Blue-listed includes any ecological community, and indigenous species and subspecies considered to be of special concern (formerly vulnerable) in BC. A recent Federal Court decision confirmed that the Government of Canada had failed to meet its legal obligations to protect critical habitat for MaMus and other migratory birds under SARA and must go to greater lengths to reduce habitat loss.

MaMu in B.C. have lost up to 50% of their breeding habitat and populations continue to decline.<sup>3</sup> The Species at Risk Act Recovery Strategy stipulates that by 2032 (in 7 years), “any decline of the B.C. [MaMu] population and the area of its nesting habitat will have slowed to a halt” and that in the East Vancouver Island region 90% of 2002 populations and proportionate amounts of 2002 nesting habitat will have been retained. A recent study indicates that the Province has already lost 50% of the MaMu population outside of the Haida Gwaii since 1996 (Trends in radar

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<sup>1</sup> Thomas, A. D., A. Duarte, M. J. Gostin, J. T. Peterson, and D. B. Lesmeister. 2025. Passive acoustic monitoring is a cost-effective approach to conduct inland surveys for marbled murrelets. *Wildlife Society Bulletin* 49:e1640. <https://doi.org/10.1002/wsb.1640>

<sup>2</sup><https://bcnature.org/wp-content/uploads/2026/01/2026-01-27-Response-2025-09-Proposed-Auction-of-Cut-blocks-in-Tsitika-Valley-BC-Timber-Sales.pdf>

<sup>3</sup> Drever, Mark C.; Mcallister, Murdoch K.; Bertram, Douglas F.; Schroeder, Bernard K.; and Woo, Kerry J. (2021) "Trends in Radar Counts of Marbled Murrelets *Brachyramphus marmoratus* in British Columbia (1996-2018): Effects of 'The Blob' Marine Heatwave and Prey Fish Abundance," *Marine Ornithology*: Vol. 49 : Iss. 1 , Article 9. <http://doi.org/10.5038/2074-1235.49.1.1397>

counts of MaMu *Brachyramphus marmoratus* in British Columbia (1996–2018) by Drever et al, 2021.)

Logging TA1375 could jeopardize the success of the SARA Recovery Strategy. If the 300 MaMu can no longer find nesting sites, or choose not to fly over large clearcuts due to predator avoidance, the murrelet population in this area could drop by 50% given that 300 of the last surveyed 600 individual birds living in the watershed actively use the habitat located inside the TA1375 licence.

### *Big Trees*

Close to 30% of the Large Cultural Cedars identified in the region fall within the revised cutblock. Neither the Site Plan map nor the Harvest plan map show the many flagged Large Cultural Cedars that surround EVtk4SY. The Site Plan map indicates the location of two Large Cultural Cedars whereas the kmz file shows that 82 LCCs have been documented both inside and outside the block boundaries. Unless they are marked as 'Leave Trees', they are at risk of damage or removal if the cutblock goes ahead.

One potential Legacy Tree is located within the revised cutblock and two trees previously designated as legacy trees are located in close proximity to the revised cutblock. All three fall within 30 m of the new planned access roads. The road right-of-way can reach 30 m in width, increasing the likelihood of adverse effects on the adjacent forest.

Two yellow cedars adjacent to the cut block that were previously listed as Legacy Trees have lost their Legacy Tree designation as a result of BCTS arbitrarily increasing the dbh threshold several years ago. The rationale given was that field teams were finding "too many" qualified Legacy Trees.

The potential Legacy Tree is a Western Hemlock that is several centimeters below the current dbh threshold in the BMP but meets several other Legacy Tree criteria: is a unique tree due to its size (there have been no other Western Hemlock recorded as Legacy Trees to date, and there is a scarcity of Legacy Trees in the area). The BMP also contains the footnote to Table 1: Diameter Guidance for Legacy Tree Retention in Section 1. Guidance for Selection of Legacy Trees for Retention. The footnote reads:

"The University of British Columbia (UBC) BC Big Tree Registry is used in this BMP as the reference source to identify the largest trees by diameter and species for those species that are capable of growing to very large diameters in BC. As guidance, this BMP recommends that trees that are at least 50% of the largest diameter of those registered in the UBC Big Tree Registry can be considered as unique and can be considered by BCTS for retention. "

This BMP and its diameter thresholds are intended to be used as a guide in assessing whether a tree qualifies for Legacy Tree status. It is up to the judgement of the assessor to consider all factors in determining if a tree qualifies as a Legacy Tree. While this tree is several centimeters

below the dbh threshold of the BMP, it fits within the criteria to be classed as a Legacy Tree as it is an ecologically significant tree (no others of this species have been recorded as a Legacy Tree under this BMP), conferring Legacy Tree status and reserving it from harvest, along with an associated buffer, would not interfere operationally with cutblock development or isolate future timber development. To give this tree Legacy Tree status and reserve it from harvesting would align with the forest stewardship practices which BCTS advocates for.

BCTS staff measured the large Western Hemlock in EVtk4SY at several centimeters below the BMP threshold of 1.9 meters. If the directive mentioned above were to be applied, the threshold would be 1.2 (2.4 x 50%) meters dbh as the largest recorded Western Hemlock in the registry is 2.4 meters dbh. Even if the threshold guidance in Footnote 1 were increased to 75% (as was the case with Yellow Cedar), this would still give a threshold of 1.8 meters dbh which would put the Tsitika Western Hemlock firmly in the class of a Legacy Tree.

### *Old Growth Specklebelly Lichen*

21 of the 29 Old Growth Specklebelly Lichen locations (72%) identified by iNaturalist and BCTS in the original cutblock area fall within the revised TA1375 cutblock.

Old Growth Specklebelly Lichen is a blue-listed species of ‘special concern’. Under the Accord for the Protection of Species at Risk (1996), the federal, provincial, and territorial governments agreed to work together on legislation, programs, and policies to protect wildlife species at risk throughout Canada. In the spirit of cooperation of the Accord, the Government of British Columbia has given permission to the Government of Canada to adopt the Management Plan for the Old Growth Specklebelly in British Columbia (Part 2) under section 69 of the Species at Risk Act (SARA).<sup>4</sup> Environment and Climate Change Canada has included a federal addition (Part 1) which completes the SARA requirements for this management plan.

According to BC CDC<sup>5</sup> *Pseudocyphellaria rainierensis* is slow to establish, and “colonizes the branches and trunks of conifers in ecologically stable lowland to mid-elevation old growth forests, especially in localized nutrient hotspots. Nutrient hotspots tend to develop in three situations: (1) within the drip zones of large old Yellow-cedar trees, usually on hillsides; (2) in the (nutrient receiving) toe-slope position at the base of hillsides, particularly in localities underlain by calcareous bedrock; and (3) in well ventilated seaside trees in coves sheltered from storm winds. The first habitat type appears to be of greater importance in the northern portion of the range, where climatic conditions suitable to *P. rainierensis* overlap with the highly acidic Coastal Crystalline Belt.”

### **Additional Concerns**

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<sup>4</sup> Environment and Climate Change Canada. 2017. Management Plan for the Oldgrowth Specklebelly Lichen (*Pseudocyphellaria rainierensis*) in Canada. Species at Risk Act Management Plan Series. Environment and Climate Change Canada, Ottawa. 2 parts, 3 pp. + 18 pp.

<sup>5</sup> B.C. Conservation Data Centre. 2025. Species Summary: *Pseudocyphellaria rainierensis*. B.C. Minist. of Environment. Available: <https://a100.gov.bc.ca/pub/eswp/> (accessed Mar 26, 2026).

### *Impacts on Adjacent Ecological Reserve*

TA1375 lies adjacent to the Tsitika Mountain Ecological Reserve, established in 1989 to “protect representative montane and subalpine forest and bog communities”.<sup>6</sup> In B.C. government documentation for the reserve, nearby forestry activities are listed as a key threat to the success of the reserve:

“Insufficient buffer zone increases windthrow risk within reserve. Adjacent logging creates fringe effect and opens access to the reserve, increasing the introduction of non-native invasive species. Increased sedimentation in riparian habitats is also a result.”

We commend BCTS for reducing the cut block size in order to increase the buffer zone and reduce the potential impact to the adjacent reserve, part of the upper boundary of TA1375 still remains close to the reserve and warrant concerns about ecological impacts to the reserve—as well as any planned conservation areas being discussed in relation to the Integrated Resource Management Plan currently being developed.

### *TAP Priority Deferral Area*

The high ecological value of this old-growth forest was recognized by the B.C. government-appointed Old Growth Technical Advisory Panel when the panelists identified the area encapsulating TA1375 as a Priority Deferral Area. Both segments of TA1375 fall completely within the TAP designation of ‘Ancient Forest’ (Map 3). Ancient forests in provincial forest inventory data were defined using Structural Stage 7b (“very old”) from Land Management Handbook 25 (Province of British Columbia 2010), where ancient is >400 yrs in NDT (Natural Disturbance Types) 1, 2, 4 (ecosystems with rare stand-initiating events, ecosystems with infrequent stand-initiating events and ecosystems with frequent stand-maintaining fires) and >250 yrs in ecosystems with frequent stand-initiating events.

BCTS states that they have been working with the Nanwakolas member First Nations to complete an Integrated Resource Management Plan using current resource inventories, information concerning important indigenous cultural values and field data of stand level attributes, and based on their chosen criteria TA1375 was not selected for inclusion in their network of protected habitats. The field data and inventories used to make these decisions, however, have yet to be shared and the process remains nontransparent.

### *Nearby Bear Den*

There is an observed bear den on the eastern boundary identified by a former Career and Technology Studies (CTS) Forest Technician who has brought it to the attention of Helen Davis, MSc, RPBio and Jim Cuthbert MSc RPBio and also Jeff Hamilton from the BCTS Georgia Strait office who replied on March 5, 2026 stating: “BCTS acknowledges receipt of the details of a new

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<sup>6</sup> [https://nrs.objectstore.gov.bc.ca/kuwyyf/tsitika\\_mountain\\_detailed\\_description\\_4287364ff3.pdf](https://nrs.objectstore.gov.bc.ca/kuwyyf/tsitika_mountain_detailed_description_4287364ff3.pdf)

resource feature outside of the cutblock boundary according to your information. We will consider BCTS Strait of Georgia’s [Bear Den BMP](#), appropriate QEP assessments outside of the denning period of Nov 1 to May 15<sup>th</sup> as per [West Coast region guidance](#), and incorporate management strategies into the operational plans for TA1375.”

*Blue-listed Ecosystems*

There are three Blue-listed ecosystems within the revised cutblock boundary (HwCw – Salal, HwBa - Deer fern and BaSs - Devil's club; see Table 1): two occurrences of the western hemlock, amabilis fir – deer fern plant association, one occurrence of the western hemlock, western red cedar – salal association and one occurrence of the amabilis fir, sitka spruce – devils club association.

Primary Ecosystem	# of Occurrences	Status
HwCw - Salal	1	BLUE
HwBa - Blueberry	4	
Secondary Ecosystem	# of Occurrences	Status
HwBa - Blueberry	2	
HwBa - Deer fern	2	BLUE
Third Ecosystem	# of Occurrences	Status
BaSs - Devil's club	1	BLUE

**Table 1:** Primary and secondary ecosystems within the revised TA1375 boundary, including three BLUE-listed ecosystems.

*Climate Impact*

Old coastal forests in British Columbia accumulate large stores of carbon over centuries.<sup>7</sup> When these forests are clearcut, a substantial portion of that stored carbon is released through tree removal, decomposition of logging residues, soil disturbance, and slash burning.<sup>8</sup> Studies estimate that 40–65% of the carbon stored in old-growth forest ecosystems may ultimately be released following logging, even after accounting for carbon stored in long-lived wood products.<sup>9</sup> The forests within this proposed cutblock contain over 12,400 tonnes of carbon, equivalent to roughly 22,000 tonnes of carbon dioxide (CO<sub>2</sub>)—an amount of greenhouse gas comparable to the emissions produced by burning about two million gallons of gasoline.<sup>10</sup>

<sup>7</sup> Nature — Luysaert, S. et al. (2008). Old-growth forests as global carbon sinks. Nature. <https://www.nature.com/articles/nature07276>

<sup>8</sup> Harmon, M.E. et al. (1990). Effects on carbon storage of conversion of old-growth forests to young forests. Science. <https://www.science.org/doi/10.1126/science.247.4943.699>

<sup>9</sup> Sierra Club BC (2020). BC’s Old Growth Forests and Climate Change. <https://sierraclub.bc.ca/old-growth-and-climate-change/>

<sup>10</sup> U.S. Environmental Protection Agency (2023). Greenhouse Gas Equivalencies Calculator. <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

### *Hydrological Impact*

A tributary to Catherine Creek of stream order 3 (a hierarchical, numerical method for classifying the size and branching complexity of streams within a watershed) runs through the larger, southern cutblock segment of the revised TA1375. Seven fish species have been observed downstream from where the tributary enters Catherine Creek which flows to the mainstem of the Tsitika River. These include Pacific Lamprey, Cutthroat Trout, Dolly Varden, Steelhead Trout (including summer and winter run sub-species) as well as all 5 species of Pacific salmon: Pink, Sockeye, Chum, Chinook and Coho. These observations include spawning habitat for Pink, Chinook and Chum salmon.

Due to the steeper slopes within the cutblock and the existing three large clearcuts downstream of this tributary, runoff due to heavy rainfall events (that are typical to northern Vancouver Island in the winter season) could adversely affect Catherine Creek and downstream, mainstem Tsitika River. While past and current pressures on salmon habitat in the watershed are ranked as low to moderate, records suggest marked declines in spawning numbers in recent years for all salmon species observed in the Tsitika River. Data recorded in the Tsitika watershed over the last several years indicates an increase in severity and duration of hot summer temperatures that could negatively impact salmon in the system, especially where canopy cover has been removed. These troubling trends, combined with the absence of up-to-date DFO salmon escapement summaries and the resulting inability to produce accurate population estimates for the watershed, point to the need for increased precaution and thorough evaluation of combined hydrological impacts.

### *Low Volume of Merchantable Timber*

Table 2 identifies attributes of the revised TA1375 cutblocks taken from the B.C. government Vegetation Resource Inventory (VRI). Hw represents western hemlock and Ba represents amabilis fir, the two species that dominate 90% of this habitat. Estimated Timber Volume data are a general estimate of the total volume of wood contained in the cutblock. These estimates do not represent merchantable timber volume as identified in typical BCTS sales schedules. The total sales volume in the original TA1375 cutblock boundary is noted as 27,047 m<sup>3</sup>. The revised cutblock is ~ 63% of the original cutblock area, suggesting that there is approximately 17,000 m<sup>3</sup> of merchantable timber within the revised boundary.

According to multiple forestry professionals we have communicated with, the timber value for this cut block is extremely low. Forestry industry log scaler/graders we consulted described Block TA1375 as composed of old growth Western Hemlock and Balsam (fir) on steep slopes, stating that this is usually extremely defective wood and when it has fallen the butt end of the log is usually rotten and the top end self bucks on impact. This leaves a very limited amount of value-added wood once the logs are buck for market. Hemlock and Balsam are the lowest value wood of all species.

Vegetation Resource Inventory Section	Area (ha)	Leading Species	Leading Species %	Age Class	Second Species	Second Species %	Age Class	Leading Species Tree height (m)	Estimated Timber Volume (m3)	Biomass (tonnes)
1	4.7	Hw	65	9	Ba	35	9	40	4,869	2,459
2	10.7	Hw	60	9	Ba	20	9	44	11,207	6,090
3	7.2	Hw	50	9	Ba	40	9	38	5,758	3,146
4	1.4	Hw	50	9	Ba	30	9	37	1,204	630
5	0.3	Hw	60	9	Ba	25	9	44	259	136
6	0.1	Hw	60	9	Ba	35	9	35	39	20
<b>Totals</b>	<b>24.4</b>								<b>23,336</b>	<b>12,482</b>

**Table 2:** Summary of Vegetation Resource Inventory attributes for TA1375.

## Recommendation

Based on the many ecological and cultural values coinciding in TA1375, the low economic value of the timber in this cut block, and the presence of several species and habitats of concern (with legislation mandating their protection), we strongly recommend that this cut block be exempt from logging and instead be placed under consideration for permanent protection.

In Map 2, the green boundary identifies a logical addition to the existing Tsitika Mountain Ecological Reserve, or alternatively the establishment of a Wildlife Habitat Area—which has already been proposed to Premier Eby and other relevant government staff—to adequately protect at-risk species and species/habitats of concern (included lichen, murrelets, screech owls, and BLUE-listed habitats) as outlined in relevant legislation and policy.

## Conclusion

Logging this unique old-growth forest will result in little financial gain and cause long-term ecological and cultural damage. BCTS and the BC provincial government have an opportunity to put their stated old growth policy into action by adhering to science- and ethics-based guidelines around protecting what few intact ancient forests still remain in British Columbia.