

To:
 Referrals Kalesnikoff Lumber Company
 February 9, 2021
 Comments in regards to Kalesnikoff Lumber Company's draft FSP #597 Amendment 3, 2021 to 2026
 (GWPS FSP597 2021 comment)

Forest Stewardship Plans (FSPs) are described as "...the only operational plan that must be made available for public review and comment, and is the only operational plan that requires government approval. In the FSP, license holders propose how they will meet government's objectives. The FSP is meant to provide government with a set of measurable or verifiable results or strategies against which government enforces compliance and to assure the public that all resource values are being conserved and protected."¹

We are stewards and stakeholders of the Glade Creek Watershed, and our mandate is to protect the ecosystem of the Glade watershed, and maintain current water quality, quantity, and timing of flow, influence the watershed processes to restore historical natural levels of water quality, quantity and timing of flow and provide for the health and wellbeing of the Glade community.

The Glade watershed encompasses a public forest that provides water to the community of Glade since Doukhobors established a water license here in 1908, and settled in 1910. In 1974, the Glade Irrigation District (GID) was formed and took on the responsibility for the water system. It is the sole domestic water source for approximately 110 households and supplies the majority of Glade with drinking water. Additionally, 25 to 30 homes get water from PODs on small upper face watersheds.

The FSP is a template stating that a timber company is proposing to log a large area possibly within the next five years and that they will adhere to all government and regulatory mandates in regards to their timber cutting. The FSP essentially explains to the reader how areas of concern will be protected. Being a template, the government formula for that protection is as follows:

1. These areas of value and concern are said to be protected: biodiversity, species at risk, community watersheds, riparian zones, cultural heritage sites, soils, grizzly habitat, ungulate ranges, caribou, fish habitat, old growth forest, wildlife trees etc., *unless*
 - a. the licence holder can modify the regulations around the issue of concern and/or
 - b. the timber supply is 'unduly' impacted and/or
 - c. any number of listed, regulated extenuating circumstances can be met and/or
 - d. a Qualified Registered Professional says they can be exempted.

The community of Glade offered many comments in 2016/2017 for the original FSP. Since that original FSP was published, the GWPS and members of the community, professionals, and community leaders have offered many solutions to the proposed current logging methods.

Among them were public comments made during field trips, documents submitted to the timber company by the GWPS pointing out concerns in the current plans, professional documents that alerted the logging company to concerns about the proposed logging and the impact it would have on the watershed, information about climate change that is supported by a CBT sponsored report that stated specifically the concerns about climate change in the Kootenays, and two reports commissioned by the GWPS, one specifically titled *Is there a Threat to Glade Drinking Water Supply?* (Dr. M Carver, 8p, Jan 2017) and Herb Hammond's *Initial Field Review and General Considerations* (Forest Ecologist, Forester, Silva Ecosystem Consultants Ltd 34p, Jun 2017) of the KLC cut blocks.

The GWPS invested, with financial support from GID and community donations in a number of data collecting projects on Glade Creek, something that is maintained daily by Glade volunteers, essentially delivering data that can be used to answer questions about flow levels on Glade Creek that currently do not exist.

¹ Forest Practices Board, Special Investigation Are they Meeting Expectations? 2015.

A glaring example of what the FSP proposes to do, and the allowances that can be used to legally curtail those proposals, are as follows:

A hydrological assessment (the Apex report) of the Glade Creek Watershed was commissioned and it was released in 2016.²

In regards to protections for a community watershed, the objective of the Apex assessment was to “provide guidance for forest development” and to determine “hydrogeomorphic risk to water quality, quantity and timing of flows ... associated with existing and *proposed* forest development.” (Emphasis mine)

From its release, there were many concerns about the limitations of the assessment. Main concerns around the watershed assessment is that

- It is incomplete because it does not include historical data concerning floods and fire, and does not include risk considerations for planned cut blocks and roads
- It is outdated due to a landslide that occurred since the report was published
- It is limited due to inadequate water monitoring data

Despite these concerns, the licensee still considers the Apex report to be satisfactory for their FSP strategies and valid for 10 years. Since the release of the 2016 Apex report KLC has drawn up site plans for three cut blocks and developed roads into one of those. One of the cutblocks was renumbered and now ‘belongs’ to the McPhee Creek cutblocks, but it is still 60% within the Glade Watershed.

Further, unknown to anyone except KLC and the Qualified Registered Professional, and discovered solely by chance in 2020, the original 2016 Apex assessment was altered by the author in 2018 to include new data and diminish the protection afforded to the Glade Creek watershed provided in the original 2016 report. Remarkably, the data in the 2018 revision has been significantly altered; material deleted, and the risk analysis ratings had been changed with no explanation, added data, or extra field days. For example,

- *Landslide Risk To GID Intake* was decreased from Moderate (original 2016) to Low risk (2018)
- the risk of *Harvesting Levels Increasing the Hazard of Flood Events* was changed from Low (original 2016 report) to Very Low risk (2018)
- the *Flood Risk To GID* was reduced from Moderate (original 2016 report) to Low risk (2018)
- the *Risk To Intake from Landslides that are Upstream or Upslope Landslide Risk to GID Intake* was considered High , and then reduced to Moderate risk (2018)³

The FSP is a legal document that the licensees are required to share with the community. The Apex report is an integral part of that FSP. The fact that it was altered for apparently no reason, and further that no one was informed brings doubt to mind about the legal flexibility of the FSP, and the professed claim that the licensee wants to have ‘continual information sharing’ (p34, Draft FSP) with the community.

There is nothing in the new draft FSP about measures that might apply due to climate changes. The stocking standards remain the exact same as in the previous FSP. There are no changes to the handling of riparian zones. Even the references have had no new additions or expansion. One thing that has changed is that the language has been tightened up to *reduce* protection for the watershed and other values in the Glade area.

For example, under Section 6.1.2.5 Community Watersheds, the physical area where it is unnecessary to request a hydrological assessment has been grossly enlarged from ‘salvage’ to now cover ‘the proposed development’ area.

² [(Glade Creek Hydrogeomorphic Assessment) by Dr. K. Green of Apex Geoscience Consultants Ltd., (Apex Report Apex File HA-15-KL-02)].

³ Ibid.

The draft FSP states that “Hydrological assessments will be conducted in advance of new forest developments...” (p23) except when they are not; for example, the three cut blocks that were proposed and planned after the assessment was released in 2016.

These cut blocks are also not considered to be an ‘appreciable change’ that would warrant a new hydrologic assessment, and nor is a large landslide that goes down to Glade Creek, situated below one of the proposed cut blocks considered an ‘appreciable change’.

Just to be clear, in this case, neither the new development by the licensee nor a landslide is considered ‘appreciable’ change in this FSP. And to clarify that further, it has been *written into* this FSP so that any natural disturbance and any new cut blocks will not need the current, 2018 revised version of the Apex report to be updated unless it exceeds the current estimated ECA in the Apex report. Nor would a *new* hydrological assessment be necessary according to this FSP.

This resolves the issue of community concerns expressed about the slide and the cut blocks that were not included in either the 2016 Apex report or in the 2018 version, when three of the blocks could have been assessed. Meanwhile, ECA has been acknowledged by many professionals as a poor marker for projecting hydrological impacts in a watershed, and yet it is still being used here for exactly that purpose.

Another change to the new draft FSP is that a number of additional pages clarify the many ways that the Old Growth Management Area (OGMA) can be modified or exempted from their protected status by the logging company. For example, if the OGMA is in the way of accessing other timber, then the OGMA can be removed⁴. Old growth is ‘not considered available for harvest’ (p41, Draft FSP 2021) but these areas can be amended, changed, modified, moved, or otherwise exempted from this ‘protection’ afforded to old growth trees by the licensee and/or a Qualified Registered Professional.

B.C. has entered a new era of climate emergency that is marked by risks to communities, and forest management must be adapted ... This presents an opportunity to right the wrongs of the past, transition to a more sustainable model of forestry, and build more resilient communities. However, time is running out, as these threats will only increase in magnitude with further warming and logging of intact forests.

This is a quote from a recent report⁵ about climate change impacts and the fact, not opinion, that conventional logging exacerbates all of these impacts. The Forest Ministry even stated that “Our government appreciates the work...in compiling this report and we will consider the findings and recommendations as we work toward a cleaner B.C.” said the Forest Ministry in an email statement.⁶ If the Forest Ministry is considering this report, it seems likely that the licensees should as well.

In addition, a report released locally, *Columbia Basin Trust Report: Water Monitoring and Climate Change in the Upper Columbia Basin*⁷ concluded the same situations will arise, indeed, they are occurring now. Late summer storms are increasing and snowfall and rain on snow events are getting heavier, but with an overall decrease in much needed precipitation. Increasing sudden heat in early spring is causing flooding and a dearth of water in the heat of summer. As well, storms in the winter cause an excess of broken trees and branches, some high up in living trees, clogging streams, causing more wild fire fuel and increasing the danger of disease and insects in the trees.

Proposed conventional logging and road building, as put forward in this draft FSP #597, will compromise the viability of our watershed to provide us with clean, safe water. It is even more imperative now, given what we know about logging and climate changes in this area to protect our water.

⁴ Appendix C Modifying Old Growth Management Areas, Draft FSP p41

⁵ <https://sierraclub.bc.ca/wp-content/uploads/2021-Forest-Climate-Risk-Assessment-Report-final-February.pdf>

⁶ (<https://www.vicnews.com/news/b-c-will-consider-recommendations-of-report-linking-climate-change-to-logging-practices/>)

⁷ Summary of Current Status and Opportunities (68p)

Glade Watershed Protection Society does not support this FSP, it is a document created by a system that is solely interested in the revenue of the forest and adhering to out of date practices that are impacting our climate. Despite what it proposes to do, this new draft FSP offers no protection and clarifies new ways *not* to protect. Licencees already state that they 'have' to log in our watershed, because no other trees are available. Apparently then, we can safely assume that the current 'sustainable' way of conventional logging is a failure.

Current practices in our public forests are robbing our province of valuable ecosystems, the history and beauty of ancient trees, our water sources and wildlife and actively endangering communities and ecosystems through the timeworn practice of conventional industrial logging.

So we need a shift. A shift in thinking and current logging practices. It can be done. It could be done with support from licencees.

Our public forests are part of the greater climate and we need to understand and restore what small portion of intact forests we have left.

GWPS is seeking to implement a proposal for a Community Forest and/or a Nature Based Plan with emphasis on restoration as a way to protect our watershed and address climate impacts. Glade residents, the people who live in this community, are the best people to protect community water through an ecosystem-based Nature Plan.

Thank you for your time,
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