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Directors  
Regional District of Central Kootenay  
Nelson, BC

*Via e-mail to:* Andy Davidoff, Ramona Faust, Walter Popoff

I am writing to you, regarding the scheduled presentation “Harvesting in Watersheds” by the Interior Lumber Manufacturers Association on September 21, 2017.

As a forest ecologist and registered professional forester, I have been directly involved in planning, protection, and restoration of consumptive use watersheds for nearly 40 years. I have reviewed the ILMA’s presentation to the RDCK and find it inaccurate and troubling for the following reasons:

1. The presentation is written as though the ILMA fully controls decisions and operations in *public* forests playing the vital service of consumptive use watersheds. This is a result of the de facto privatization of public forests in British Columbia to the timber industry through the Forest and Range Practices Act and the practice of professional reliance.

We now have an industrial timber management lobby group setting themselves up to “work with” local government to log consumptive use watersheds. This is entirely inappropriate, and the RDCK should be meeting with provincial government officials to conserve, protect, and restore water quality, quantity, and timing of flow in consumptive use watersheds throughout your jurisdiction. Water is a common property resource to be protected and managed under the guidance of socially responsible bodies, like provincial and local governments, not corporate development interests.

I encourage you to set in motion a process to work with the provincial government to reverse the effective privatization of public forests through the Forest and Range Practices Act and the practice of professional reliance. This is a key step in securing the protection and restoration of consumptive use watersheds, as well as the range of ecological services provided by *public* forests.

2. If you desire to have a presentation about existing and potential impacts to water from timber management, I suggest that you invite Dr. Martin Carver, forest

hydrologist to address the RDCK on this matter. Martin has extensive experience evaluating watershed sensitivity and timber management proposals for consumptive use watersheds in various locations in the Kootenays and elsewhere.

3. The ILMA asserts that their members have been carrying out responsible watershed management for “countless decades.” I have significant evidence through my own planning and analyses that indicate that this statement is not accurate. Indeed, the way that ILMA members conduct timber management through short rotation clearcutting and tree plantations almost always degrades water. Negative impacts to water may not be initially evident following logging, but they develop over time as formerly forested areas struggle to reestablish their integrity.

The municipalities of Vancouver, BC; Victoria, BC; and Portland, Oregon once practiced industrial forestry like that proposed by the ILMA in their consumptive use watersheds. These municipalities no longer carry out forestry in their watersheds, because they found that timber management is incompatible with maintaining high-quality water supplies. The situation in the Kootenays is no different than that found in these municipalities.

4. The ILMA suggests that decisions about consumptive use watersheds need to be “based on past and present practice and the best known science available.” The best available science indicates that old and old-growth forests produce the highest quality water with the most stable flow regimes. Thus, the best water quality, quantity, and timing of flow has been shown to be produced by forests that are 3 to 4 times the “age of maturity” referred to by the ILMA as the time to extract timber.

In terms of timber management practices in consumptive use watersheds, the Forest and Range Practices Act places protection of water secondary to timber supplies. Water protection measures, even in designated *Community Watersheds*, are acceptable only as long as “it does not unduly reduce the supply of timber from British Columbia’s Forests.” This weak, discretionary standard is the basis for past and present timber management in consumptive use watersheds.

5. In their presentation, the ILMA asserts that past timber supply reductions are the result of “park expansions, caribou habitat, and visual quality objectives.” This is an incomplete and misleading statement. While reductions have occurred for these reasons, these reductions were based upon broad public planning processes, which represent a social consensus for managing *public* forests in balanced ways. In some cases, like visual quality objectives, these and other constraints to timber supply have been lessened under the Forest and Range Practices Act era.

More important reasons for the current timber supply shortages have to do with inaccurate, and overly optimistic timber supply analyses that form the basis of allowable annual cut (AAC) determinations for public forests in British

Columbia. The ILMA and its member logging companies contributed to the inaccurate, overly optimistic assumptions that have kept the AAC artificially high, as this improved their short-term profit picture.

Precautionary, spatially-based planning of timber resources is necessary to develop *long-term, sustainable* AAC's. This is a well understood principle of good forest management. However, the ILMA and its member logging companies have steadfastly refused to invest in this type of planning which is necessary for real sustainable forest management. Thus, the timber supply crises that the ILMA would like to temporarily avert by logging consumptive use watersheds is of their own making and will not go away until approaches to determining the AAC are based upon ecological realities, and reasonable social constraints. These ecological realities and social constraints are needed to protect the vital ecological services we receive from intact, natural forests, including pure water in moderate flows, air purification, wildfire resistance, carbon sequestration and storage, and climate moderation.

6. The ILMA suggests that stumpage revenue provide "a mitigation fund managed by the Regional Districts" to fund increased restriction of access to consumptive use watersheds, restore damage to watersheds from past development, and educate the public about why logging in watersheds is acceptable. This suggestion is little more than asking the people of British Columbia to pay for services to make watershed logging more palatable thereby subsidizing further profit-taking by ILMA logging companies in consumptive use watersheds. If the ILMA sees these activities as necessary, they need to be paid for by timber company profits from logging in watersheds, not by the public who must bear the problems that inevitably are involved with industrial timber management in consumptive use watersheds.

There are many other points that may be discussed about the ILMA's proposal for "Harvesting in Watersheds." I am currently engaged in analyzing both past and planned logging in consumptive use watersheds within the bounds of the RDCK. If desired, I would be pleased to make a presentation to the RDCK about my findings in these analyses.

I would be pleased to provide data to substantiate the points I have raised in this letter, and would be happy to answer any questions that may arise from the contents of this letter.

Sincerely,



Herb Hammond, Forest Ecologist, RPF