

PEACHLAND WATERSHED PROTECTION ALLIANCE

Submission to the BC Government's Review of Professional Reliance in Resource Industries

January 18, 2018

PEACHLANDWPA.ORG

This submission has been approved by the PWPA membership.

BACKGROUND

The Peachland Watershed Protection Alliance (PWPA) is a non-profit society of concerned citizens seeking answers and solutions to our water crisis. The vulnerability of the watershed, the source of our drinking water, is part of the complex issue we are examining. The PWPA is one of the four founding members of a province-wide alliance of communities, the BC Coalition for Forestry Reform (BCCFR) advocating culturally and economically sustainable forestry practices.

This is part of a growing movement across British Columbia responding to decades of mismanagement of our watersheds and the resulting threat to the sustainability of quality water. Change in current practices in the watershed must come soon than later. Community members are invited to join us, as we work together towards a better understanding of what's going on in our watershed. Together, we will find solutions.

The Peachland Watershed Protection Alliance formed in answer to years of boil water bans and advisories that used to span 2-3 weeks during freshet but now run 5 months or longer. Three major mudslides, extreme erosion and run off and expensive damage to our water treatment plant caused by flooding during 2017 raised concerns that logging and other commercial activities in the watershed may be increasing the floods and risk of damage to the watershed. Our journey to find solutions to the pressures on the watershed, mining, logging, road building gravel extraction cattle grazing, hunting recreation vehicle use, ATV tours, zip Line, forest fires, and bug kill have lead us on a journey of discovery. Part of this journey brought us in contact with the logging industry and the professionals that monitor it for profit and private interest. It is the intention of this submission to demonstrate how the outsourcing of overseeing the resource extraction in BC and especially within a fragile, steep community watershed have opened the doors to conflict of interest and placed the non-commercial values of air, water, soil, wildlife, recreation and biodiversity behind the commercial values of timber.

DIRECTORS:

Chair: Joe Klein

Co-Founder & Coordinator: Taryn Skalbania

Co-Founder: Cory Sutton

Communications: Patricia Dunn

Director: Norman May

Director: Jessica Klein

VISION:

A universal understanding that water is our most precious resource and deserves our protection



A grove of trembling Aspen, now recognized as a living entity, not individual trees, surround Spring Lakes, in the watershed, this grove is destined to be dissected by haul roads, and cut blocks- because it has no commercial value.

MISSION:

The Peachland Watershed Protection Alliance is dedicated to the protection of the ecosystem of the District of Peachland's watershed including its quality, quantity and timing of flow both at the source and through our taps.

Priority 1. Reduce the threats of road building, excessive logging, cattle grazing and unrestricted recreational use in the watershed to ensure healthy and sustainable ecosystems within Trepanier and Deep Creek watersheds.

Priority 2. Educate the Peachland community to improve their water use and practices in the watershed.

PWPA's Primary Focus:

The watershed from Pennask to Spring Lake with special attention given to road density and future planned logging.

Core Values for the Protection of Peachland's Water

- Sustainability
- Quality Water
- Community Responsibility
- Preservation
- Advocacy and Education



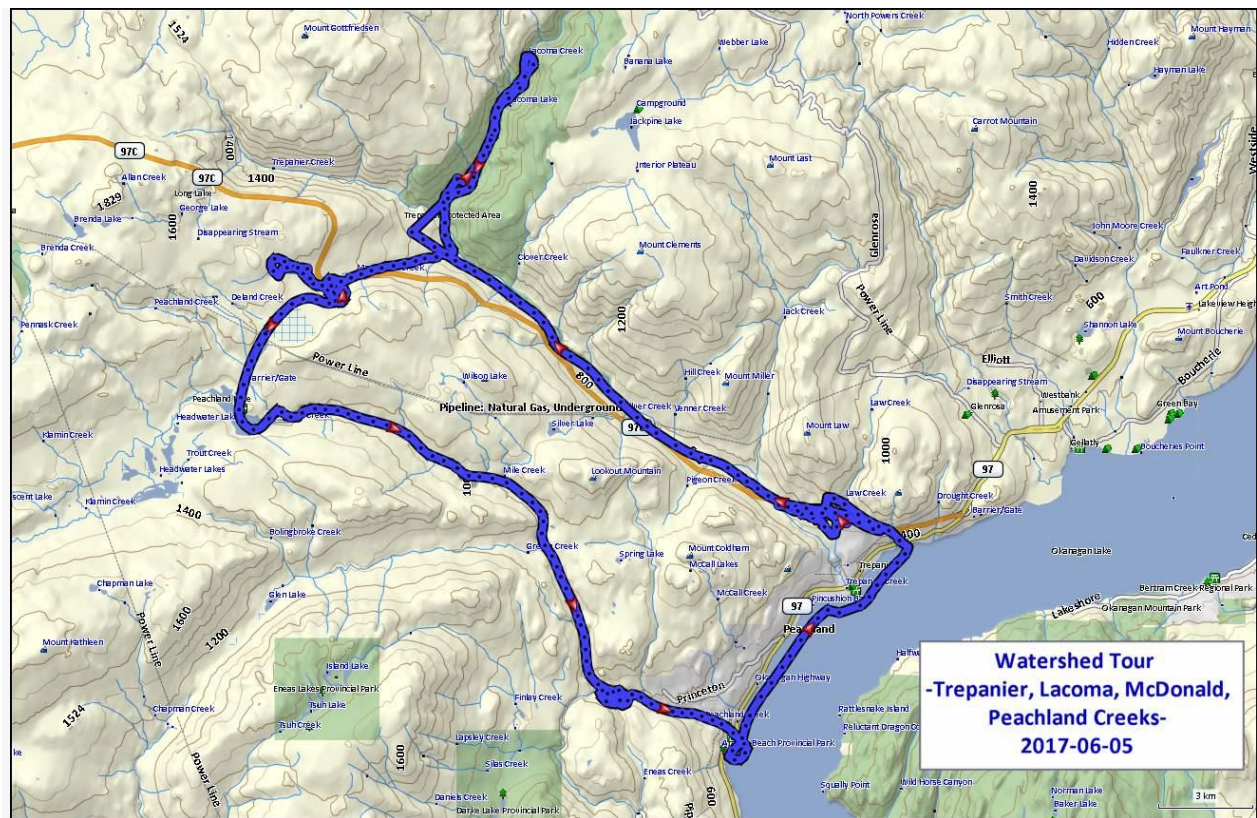
The PWPA actively engages public input with the forestry Industry, here a retired Gormans Brothers Logging forester volunteers his time to tour the watershed and discuss the many issues the residents see in their watershed. As many questions are answered, even more come forward; the public has said they feel a sense of disconnection with the province's plans for their watershed.

VIDEOS:

Time-lapse Video of the Watershed: <http://time.com/timelapse2016/>

This tool vividly displays the accelerated pace of logging in our watershed especially after the Mountain Pine Beetle was deemed by professionals to be an epidemic that would wipe out the logging industry, other values of this crown land were not taken into consideration, non timber values of soil, water, fish, wildlife, recreation and animal habitat. Increased quotas that have yet to be scaled back in volume of cut by the professionals may have contributed to mill closures, forest fires and the need to log in steep, sensitive terrain such as our Peachland Community Watershed. Timber profit eclipsed overall forest health.

Our members toured their watershed immediately after 2 costly mudslides that immobilized our water intakes and water treatment plant, professionals (FLNRO Regional Manager [REDACTED]) claimed mudslides of this magnitude happen all the time in our watershed, they are of no great consequence, and only noticeable because so close to intakes. Yet Peachland had to pay for costly repairs, and no proof was given by professionals that these were weather related only: We argue, based on data available in peer reviewed literature (Rita Winkler) that cumulative effects of commercial activity in our watershed added to the runoff, flooding, erosion and sedimentation issues.



WHY DO A PROFESSIONAL RELIANCE REVIEW:

Why is this review even necessary? This is the question asked by our PWPA members; surely this government has heard the grumblings of a multitude of issues within our forests as it relates to professional logging. There are hundreds of letters of complaint, media stories, court cases, Forestry Practices Board investigations, C and E investigations, Ministry of the Environment Investigations, and as forestry critics for the past 16 years under the Liberals, the current government was certainly aware of the conflict of interest issues of the Professional Reliance Model. While we realize and applaud you are asking for our submissions as part courtesy, part duty, we remain hesitant that our stories, our evidence and our experiences will be considered. Our requests for change may fall on deaf ears as the complaints that preceded them did for the past 16 years. Nonetheless, we will move forward and hope this submission, from all small communities and watersheds like ours, all over the province (488 at last count) can make a difference and be the catalyst to make the change in how our forests are managed.

While we are not professionals, we trust that in our search for a healthier watershed we will be dealt with in a professional manner. We believe water is king, not the forestry industry, where what is best is best for all, not just resource extraction stakeholders. There are currently four licensees with permits to log every available corner of the 2 watersheds, they include: Gorman Brothers Logging, Westbank First Nations Ntityix Resources, Tolko and BC Timber Sales.

The question is should we outsource the protection of our environment to these professionals? Keeping our rivers and lakes clean, protecting wild creatures and making sure our ecosystems stay intact are some of the most important functions of our government. But in BC, since the early 2000s, our government has handed over much of the responsibility for environmental protection to various professionals — professionals hired and paid by logging, mining and other industrial companies. PWPA has difficulty seeing the value in the outsourcing of

environment and water protection, a fundamental conflict of interest is called professional reliance.

Community watersheds are regulated by government under the Forest and Range Practices Act because special forest management is required to protect the quality and amount of water available to users who rely on it for drinking. The findings of this investigation suggest that the designation of community watershed is inappropriate in some watersheds, and where it is warranted, the protection provided is inadequate.”

Source: Forest Practices Board special investigation *Community Watersheds: from objectives to results on the ground*.

Peachland has a water problem. The diverse members of the Peachland Watershed Protection Alliance have many examples that directly attribute this to industrial logging practices; most especially, faulty and poorly conceived logging road construction – especially on steep hillsides - and lack of maintenance. Many of these problems result from questionable or incomplete advice from consultants hired by forestry companies, under the professional reliance model.

Briefly in 2017: the District of Peachland declared a State of Emergency due to a mudslide located near the poorly maintained logging road, the Munroe Forestry Road, as well as a dam clearing excavation along Deep Creek's shoreline. These contributed to Peachland issuing boil water advisories for a record eight months out of the year due to sediment from these and other logging failures in the

watershed. Ultimately, we experienced catastrophic flooding of local streams and Okanagan Lake, due in part to deforestation of our town's watershed.

Clear cut logging comprises 97% of all logging in the Okanagan Valley. Clear cuts create flooding, as they lose precipitation (rain and snow melt) 40% quicker than a canopied forest, resulting in greater peak flow and flooding.



This was once a chain of lakes, Wilson, responsible for ungulate wintering and ground water filter and storage. Now with the donut ring of trees (professional standard) left around the lake, the area has lost its function.



Aerial photography of the land directly surrounding our main watershed storage of the dammed Peachland Lake, old and conservative estimates put the ECA at 42. Professionals tell us it is fine, but the PWPA believes the flooding signs we see lower down in our watershed are directly related to this continuous clear cut by four licensees. Licensees are currently conducting their own hydrological review of upland logging since the flooding of 2017, Peachland needs to have its own independent

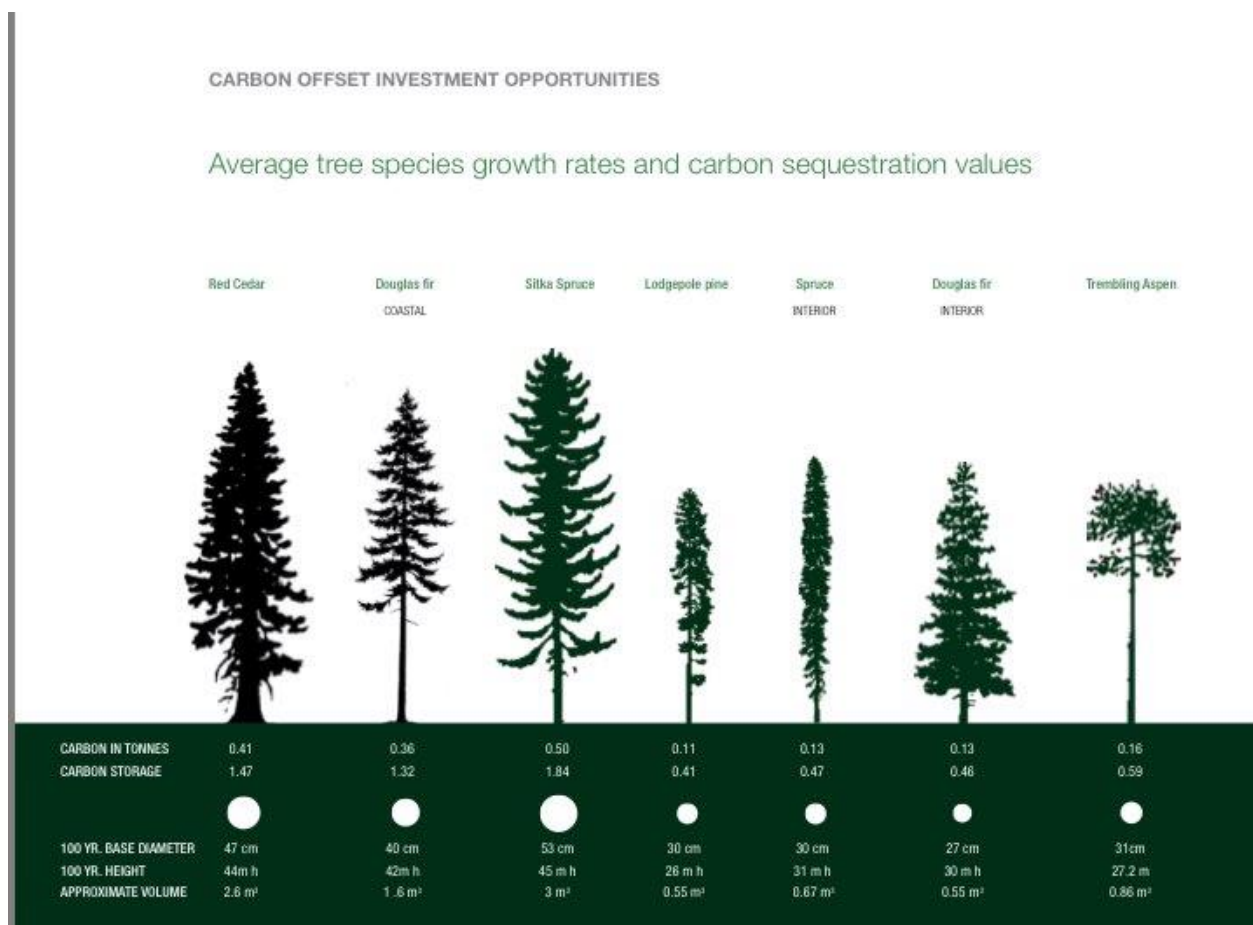
studies, and government should be paying and monitoring this, not the licensees, for the residents to feel secure. The extra accumulation of snow and precipitation on cleared lands (up to 72 per cent more than on a natural forest canopy) can lead to a 40 per cent faster melt and run off, so in a steep watershed like Peachland, excessive runoff, severe erosion, sedimentation and flooding are inevitable.

All these roads have a negative impact on wildlife as well. Increased access by logging companies leads to an increase in unregulated harvest of moose and deer, as hunters access the logging roads with their trucks and ATVs. For example, animals have lost all source of protection around their traditional watering area at Peachland's Watson Lakes, with the logging company leaving only a minimal ring of trees around the lakes.



Professionals tell us thousands of slash piles a year are sustainable, that it is too costly to salvage more wood from forests, better to burn, it would take too many man hours to select deciduous trees out of cutting areas and leave them in the forest as habitat, while the same professionals bemoan the loss of jobs in that same industry. This inconsistency needs to be addressed. Of even greater importance is the loss of carbon sequestering with the removal of trees like Aspen

from our forests, they are not replanted, on the monoculture of the tree farm. It is further inconsistent that the professionals of the Ministry of the environment prohibit a resident or municipality from burning their slash piles (yard waste of property) due to smoke harm, yet the professionals in the forestry industry are permitted to burn thousands of slash piles yearly, creating volumes of smoke.

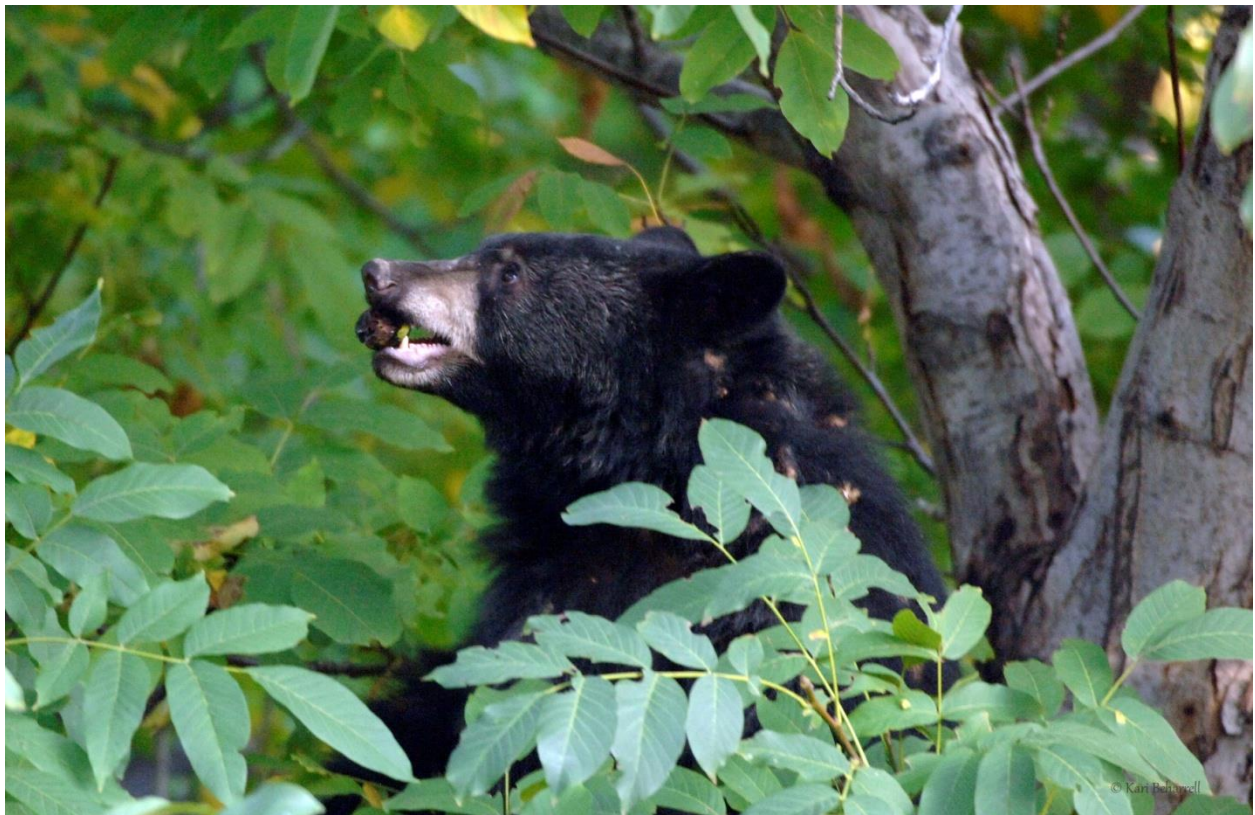


Trembling aspen sequester 45% more carbon than a lodge pole pine, 25% more than a spruce tree. http://stopthespraybc.com/wp-content/uploads/2011/07/carbon_investment_opportunities_info_book.pdf



Peachland and other areas in the Okanagan boast some of the highest road density in the province. Roads, highways, forestry service roads, both active and legacy, and the resulting quad and recreation trails all add to the flooding, run off, erosion and sedimentation, never mind the threats to wild life, pollution and forest fires. Logging is the largest contributor to roads in our areas, many of the 2.6-3% of roads per square kilometer are logging initiated. When we asked for deactivation, again we were told by professionals, they do their best, the minimum standard required by law, and it is often too expensive, and laborious (again the argument that too much manpower would be required yet the forestry industry is losing 22,000 jobs per year) . Professionals have told us, however, that roads are dangerous period, for grizzlies and other wildlife. Who is correct? The recent study below agrees, people and their activities and all vehicles period

cause issues in the forest with wildlife, but it remains the logging industry and the professionals that say roads are necessary to haul and access trees, and financially worth the risks to the environment. The professionals remain protected by the laws of the province, while wildlife remains largely unprotected. <https://www.theglobeandmail.com/news/national/study-finds-people-not-roads-bother-canadas-grizzly-bears-the-most/article37537461/>



This fellow was captured by Peachland photographer and naturalist, Kari Kallen, in our back yard watershed.

<https://phys.org/news/2018-01-roads-counters-effects-habitat-loss.html>

This additional article reveals the dangers of roads to wildlife.

There is always a bias because you're paying professionals. They know that if you aren't happy with their decision, you can always hire someone else. Word gets around about which firms make life easier for a mining company. There's a bit of a race to the bottom. And the finish line in that race? Maybe things are a little bit worse — or maybe you end up with the Mount Polley disaster, the Cherryville land slide or Cowichan Valley dirty water,

In theory, professionals are accountable through their professional association. The sad reality is that it is exceedingly rare for a professional to be held liable for environmental damages.

From this basic conflict of interest, environmental protections are weakened — and we all lose.

So if professional reliance isn't working, where do we go from here?

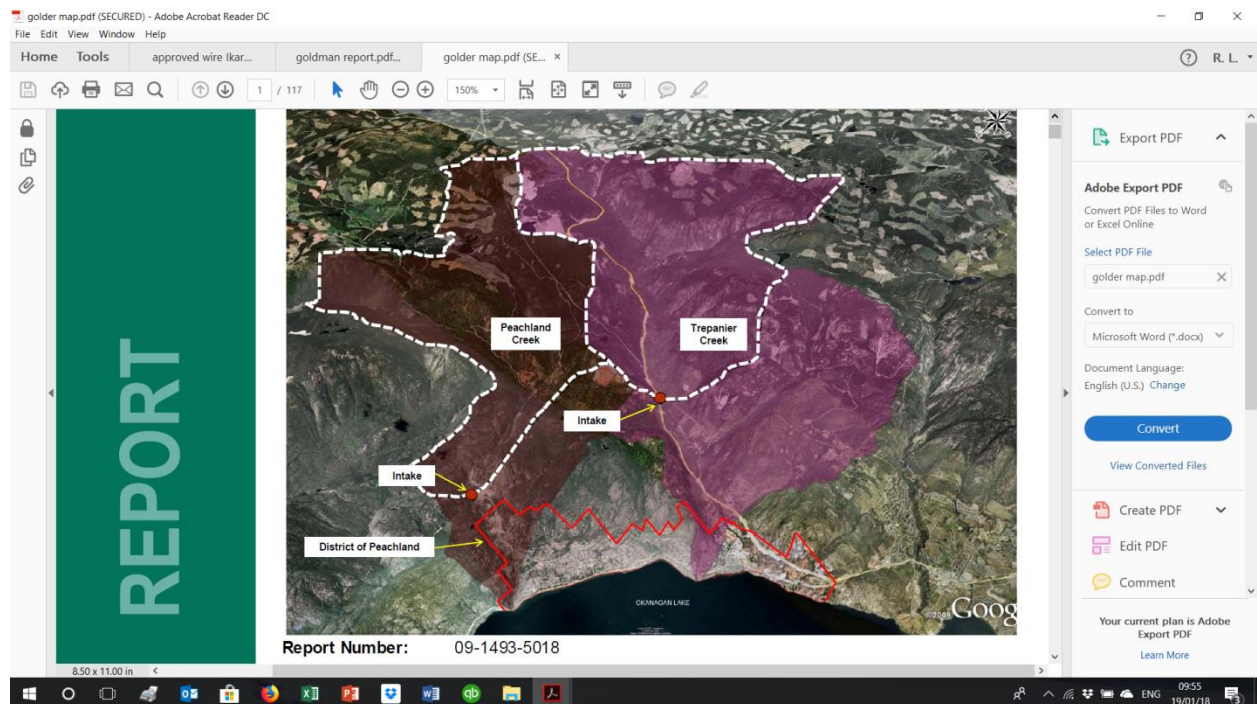
Step one is to reduce our reliance on professionals and increase the capacity and power of public servants to protect our environment. Since the early 2000s, government capacity in this area has been cut by an estimated 25%. We need a strong, professional public service whose sole focus is environmental protection.

We need to bring back strong laws and regulations, with measures that can be objectively enforced — and we need a strong, professional public service to do the on-the-ground research needed to develop regulations that are truly protective of our environment.

In cases where we may continue to rely on professionals, accountability is key. That means real liability for professionals whose decisions harm our environment, with power in the hands of the public to hold professionals to account. And

whistleblowers need protections so that bad practices can come to light. If professional reliance will be used, we must restore public trust in professionals.

Finally, we need to make sure decisions are made out in the open, with proper consultation of First Nations and opportunities for public input. When professionals make decisions, there is rarely a chance for anyone else to be heard.



We do rely on professionals, this professional report supplied by Golder and associates did a **source assessment** on Peachland's 2 watersheds in 2010, now it is up to the professionals wanting to harvest resources in those areas to follow the advice of the risk assessments in this report or better yet, help the district of Peachland and its residents, water users, recreational users, and property owners by contributing to an actual **Watershed Protection Plan** that would include all stakeholders in the area to assure the needs of all values are met, timber and non-timber, included.



This aerial photo displays Peachland's watershed clear cuts close Brenda Mines, the Coquihalla connector, BC Hydro lines and 2.5 road density, all which also act as clear cuts, so when a H60 ECA of 42% is given by hydrologists and extreme flooding happens and only weather is blamed we wonder if those professionals are using the current, up to date information and methodology from other Forestry Lands and Natural

Resources Operations,(FLNRO) professionals to calculate their cutting and harvesting plans.

Rita Winkler's recent studies on the effects of clear cuts and the hydrologic recovery of a forest stands demonstrates that this area is all still acting as one large clear cut, The lighter patches logged in these photos above were logged in the 90s according to signage in the cup blacks and they are still only 2-3 mts high trees, these stands all over the 400sq km of our watershed are still acting like a parking lot when it comes to seasonal snow-water melt and run off, they are 30+ years old they will not act as a real forest for another 50-years perhaps not able to be logged again for another 90 years, Add in the factors of climate change and the fact that this is all new science to the industry. Perhaps the advice from professionals that this rate of logging is sustainable is questionable.

Rita Winkler's report 116

<https://www.for.gov.bc.ca/hfd/pubs/docs/en/EN116.pdf>

And Rita Winkler's report 118

<https://www.for.gov.bc.ca/hfd/pubs/docs/en/EN118.pdf>



What professional reliance served us well? We have yet to hear definitively what caused the above mudslide on Deep Creek, who was responsible for the repair, and who authorized the emergency rechanneling; we have yet to be shown it was

done in accordance of regular riparian best practices. Since the mudslides left many unanswered questions in the minds of Peachland taxpayers and residents and members of the PWPA they went to all levels of government. After many requests, to Municipal, and provincial authorities as well as the licensees, we felt obliged to file a formal complaint with the Forestry Practices Board. These professionals dealt with us in a swift, open and fair manner. Our complaint is still in the early stages, we hope to find some resolutions on the water quality issues and what lack of community consultation in the decisions appears that affect our watershed. Government response to our questions ended up with the directions to file a freedom of Information request, a long, drawn out and expensive solution, and request for reports to licensees were occasionally met with privacy issues. As residents of a community watershed we felt powerless. With so many outside pressures affecting the balance of our watershed, we are searching for better communication with all professionals licensed to operate in its boundaries.

“Most forest licensees retained a professional to complete some type of watershed assessment prior to harvesting or road construction. However, deficiencies were identified in those professional assessments. Of the 31 assessments in the Board’s sample: 11 did not follow the content for the assessment as described in the FSP; 26 considered, to varying degrees, the hydrological effects of FRPA and pre-FRPA forest activities over the entire watershed; and only 6 considered the potential effects of planned forest development on water quality, quantity or timing of flow in relation to the licensed waterworks—key elements of the community watershed objective.”

Source: Forest Practices Board special investigation *Community Watersheds: from objectives to results on the ground*.



This photo graphically reveals the extent of erosion, sedimentation and run off caused by flooding spring of 2017 in the Peachland watershed. This photo was taken 8 kms up Peachland Main or Brenda Mines Road; one could easily drive a Jeep into the depths of the ditch created by the run off. This ditch snaked both side of the road for over 2 kms. This area is where the heaviest logging has occurred over the past 2 years in the Peachland watershed, by the 4 licensees. Who is responsible for this damage and repair, professionals? Some of the ditches have now been filled with rip rap.



Wilson lakes trail remnants with clear cuts in background. No longer any trails to hike or ski, no longer any sign of deer or moose tracks, they have been pushed out for the next 60 odd years, A great many of the complaints our residents and PWPA members have with the logging practices is not protection our vistas, animal habitat, animal connectivity corridors and recreational hiking, biking and ski trails. When asked, the representatives from our 4 incenses claim that professional hydrologists were consulted and they say it is safe and sustainable to log as they are. It is disturbing that we are unable to protect our trails and wildlife from these clear cuts at close proximity to our source water and key wetlands. It

is equally disturbing that a statement by [REDACTED] believes that BC Timber Sales can leave a tiny oasis at the heart of a watershed (Ymir's in this case) vital collection zone while "harvesting" the surrounding watershed with impunity based on "science." [REDACTED] has also been quoted elsewhere as saying no hydrology report has ever stopped BCTS activities. Imagine, all those professional reports done annually and no one listens to them, they may not curb or effect logging in any way. We have also been told by ministry professionals that every watershed is log-able, disturbing news to our members.



The PWWA members hard at work cleaning up the Spring Lakes ponds and wetlands, as well as doing an aerator repair during one of our any Look and Learns and Talk the Talks. Education is key.



Walk and talk watershed awareness field days with professional foresters

In 2018, Westbank First Nations is proposing to log Peachland's Spring Lakes. This will impact wildlife habitat that is already in serious decline, as the area is home to endangered species including the yellow badger, Lewis's woodpecker and mountain cottontail.

The Spring Lake area is one of the highest wintering moose densities in the Okanagan, who require mature forest canopy for thermal cover and to mitigate heavy snow levels. More roads also result in more predator/prey interactions; the animals literally have nowhere to hide. The logging will also impact recreational trails near Spring Lake, located 7 kms from town, an area resident and outdoor enthusiasts call "the park".

"The disturbance of forest by harvesting, roads, fire, insects or disease can result in a variety of hydrological effects within a watershed. Depending on site conditions, this disturbance can alter the amount of snow accumulation, the infiltration of rainfall and the rate of snowmelt. In some cases, high rates of disturbance can result in channel erosion, debris flows and floods, which affects the quality, quantity and timing of water reaching the intake where it is diverted for human consumption. Although a variety of forest disturbances can affect watershed hydrology, forest licensees can only control forest harvesting and access roads. Water quality can also be affected by fine sediment, mostly from forest roads but also from natural sources. When sediment enters a stream, the water becomes turbid, increasing the risk that pathogens from wild and domestic animals (e.g., livestock) and human sources will attach to the sediment particles. When water from the watershed reaches the intake, it must be treated so it is safe for human consumption. If the water is highly turbid, the treatment of water through ultraviolet light, chlorination and/or filtration is less effective.

Range use has the potential to affect water quality in two ways. Livestock use can damage riparian vegetation and stream banks, reducing the effectiveness of riparian areas to filter water and causing erosion. Livestock can also cause

pathogens to enter streams from fecal matter. If the pathogens are carried downstream to the intake, it can compromise the quality of drinking water."

Source: Forest Practices Board special investigation *Community Watersheds: from objectives to results on the ground*.

The FPB cites concern about professional assessments, in regard to watersheds: *"Board investigators did note that none of the recommendations were written in a way that strongly emphasizes the need for implementation, or were site-specific (e.g., most assessments include phrases like.... "the licensee should consider")*.

There are thousands of culverts in our watersheds, directing runoff at a sped up unnatural rate, if just one of these culverts gets blocked, or is placed in the wrong location by a professional hydrologist or engineer during the building of thousands of kilometers of roads each year, as happened in Naramata in 2010, massive, destructive mudslides can occur with the single oversight of the placement of one culvert or the plugging of one ditch. Where are the professionals on the ground ensuring these accidents do not occur?



The above 2 photos show range cattle, first at one of our source drinking water lakeshore, at Spring Lakes, and second less than half a kilometer from our Water Treatment Plant intake. There are currently over 1500 possible head of cattle set to roam our watershed under 3 separate range land lease agreements. Like the forestry industry the cattle industry is regulated by the Forest and Range Practices Act. There is relatively little a community watershed can say or do to curtail logging or cattle ranging in these areas, any actions unduly reducing the available amount of timber- or range area, are illegal, the industry has strong protection under FRPS, the community, little.

Citizens have to pay to correct environmental mistakes because their Municipality has not say over water in their watershed, that has been outsourced to the professionals running the logging industry or cattle business for profit, perhaps a more equitable arrangement can be legislated in a community watershed.

The logging companies and rancher are relieved of a great burden when a municipality buys into an expensive WTP, Peachland is borrowing \$10 M to pay for their \$24 M treatment plant Now the professionals know water can be dirty yet it has a good chance of getting treated as drinkable with chlorination, UV filtration and other costly treatments to the taxpayer. They are off the hook, no extra costs, no curtailing of business, they can log or range, business as usual,



Deep Creek slide above,

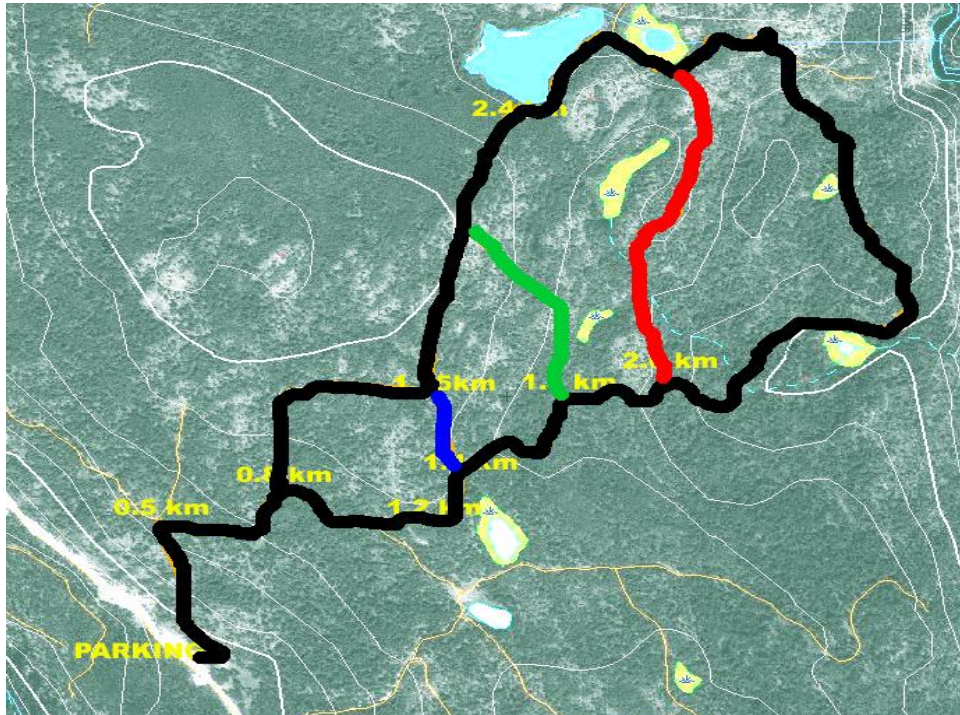


McDonald slide below

Upon witnessing the destruction to water and property caused by mudslides and flooding in the watershed, Peachlanders and their Council requested a consolidated map of all logging operations in the past, present and future in the watershed. The Peachland Watershed Protection Alliance is still waiting on the consolidated map requested and promised at the June 13 2017 Committee of the Whole presentation to district council by the 4 licensees and. Natural Resource District for the Okanagan Shuswap regional executive director **Ray Crampton**. After 5 months and the assurance from the Ministry that logging in our community watershed is sustainable it is concerning that the provincial ministry in charge of forest management has no ability to see a consolidated view of what logging has and will happen over the next few years by the permit holders in a critical watershed. It could be assumed these professionals are either intentionally hiding or intentionally withholding that information from our Alliance and municipal government? Or, they do not have the ability to produce such an overlay map, which is even of greater concern: if FLNRO cannot produce such a map, the promises made in the June 13 presentation to Peachland council stating, *BC has the best forestry practices in the world, water is king and logging is sustainable* are losing their credibility. The options of unwilling or unable to produce a map are both disturbing to the citizens of Peachland.



Questionable logging practices and climate change have increased forest fire risks in our watershed. This fire broke out just meters from our water treatment plant and stored chemicals, the fire retardant too filled the drainage area, and now ash and debris can enter the water system more readily. Animal habitat loss was great; wildfire risk is one area of professional reliance that needs revision.



This is a map of the Bedford Tails network, developed by citizens and numerous non profit community groups, this entire area is in a Westbank First Nations FSP- we hope to get professionals, like the Recreation Department of the District of Pechalnd and the local Regional district to assist us in having this trails and the surrounding ecosystem preserved. This wetland is the sponge, filter and animal habitat equivalent of the *Serengeti* for our watershed.



Photo by Kari Kallen: The lone goat still frequents the crags of Pincushion mountain, in direct collision with proposed Highway 97 bypass routes and perhaps future Forestry Stewardship Plans and logging road. We believe the Professional Reliance Model may not work in the best interests of the animals and the environment at all times, putting profit before habitat.



A well attended public Open House held in May of 2017 during historical high Okanagan flooding filled the community hall with 150+ residents wanting more of a say in Forestry Stewardship Plans in their watershed and requesting those plans and maps be easy to read, for the layman to follow. And a great plea was made at the presentations for less clear cut, more selective and heli logging in a watershed, we now the cost is too dear if we do not protect all watershed values.



More

threats to the watershed include more hydro lines dissecting the forests, trees were not harvested as we can see, but chipped, this new *green* energy power line from Bear Mountain Wind Farm at Pennask, our watershed headwaters



Men at Work! PWPA members help the local Peachland Sportsmen club with aerator repair prior to fish stocking. We know this valley has already been incredibly impacted by activities in the watershed. Just today, Jan 18-18 a report was released that 85% of natural wetlands have been lost in this Okanagan valley having negative impacts on watersheds and importantly climate resiliency.

RECOMMENDATIONS

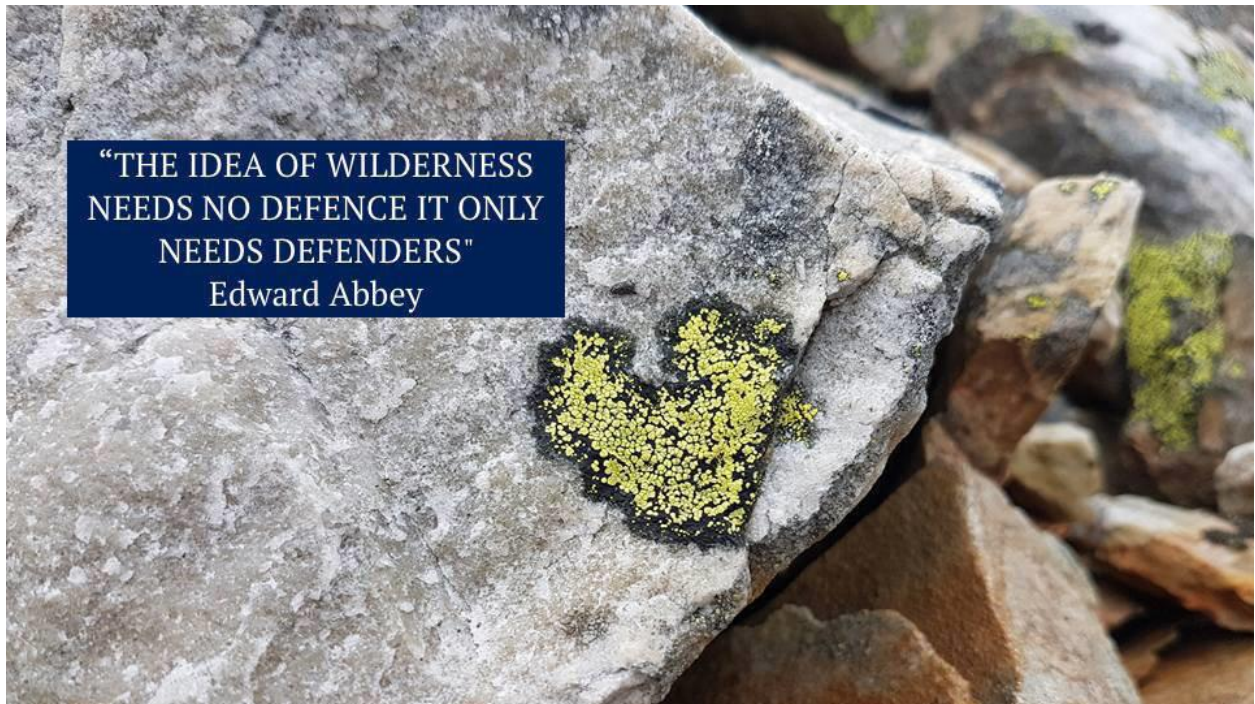
Many of the members of PWPA live in and represent a community in which forestry is an important contributor to the local economy. In this regard, PWPA is most definitely not anti-forestry. However, times have changed and the forestry industry cannot continue to dominate the provincial landscape, especially at the critical community watershed level. We believe forestry and resource extraction governance in general must take into account the following:

1. Forest development must be managed according to publicly available, long-term, landscape-level planning; to include a mandatory shared decision-making process with local communities. An integrated plan including all stakeholders. Roundtable consensus based decision making.
2. Full recognition of the timber and non-timber values of our forests including water, soils, fish, riparian areas, visual quality, cultural heritage, wildlife habitat, biodiversity, tourism, recreation, and community watersheds
3. The restoration of clear government discretionary powers with regard to approval of logging plans and practices, including an improved Forest Practices Code and accompanying guidelines and District Manager input.
4. Full recognition and guidance of forestry planning on the basis of scientific data. Full recognition, for example, of global warming and adjustment of forest policies accordingly.
5. A vigilant monitoring system, well budgeted and independent of industry control, with particular attention given to riparian zones and roads.
6. Staffing levels and budgets adequate to support the proposed changes.

The final word in our submission is again from the Forest Practices Board special investigation *Community Watersheds: from objectives to results on the ground*:
“Community watersheds are regulated by government under the Forest and Range Practices Act because special forest management is required to protect the quality and amount of water available to users who rely on it for drinking. The findings of this investigation suggest that the designation of community watershed is inappropriate in some watersheds, and where it is warranted, the protection provided is inadequate... FRPA does not regulate users of community watersheds other than forest and range licensees. Currently, it is only those FRPA licensees required to have forest stewardship plans that are involved with assessing the risks to drinking water associated with forest development. Clearly, a more integrated approach to drinking water protection in community watersheds is required... Government needs to commit the necessary resources to move ahead with a more integrated approach to planning in community watersheds, especially where watersheds are at risk, and ensure that

recommendations in those plans are fully implemented within a reasonable timeframe.

Finally...the Board encourages all parties with responsibilities in road construction, maintenance and deactivation to foster a similar culture for the management of sediment and source water protection. We believe that this could yield significant benefits to water quality."



Once again, thank you for the opportunity to provide feedback on this important aspect of natural resource management in BC. We attempted to illustrate the specific experiences we have had with professional reliance and how it has impacted important public values. If you have questions about the coordination of this specific submission please contact Taryn Skalbania, Peachland Watershed Protection Alliance.

Sincerely,
Taryn Skalbania
Peachlandwpa.org
