

# **PEACHLAND WATERSHED PROTECTION ALLIANCE**

## **Stakeholder Submission to the BC Government's Review of FOREST and RANGE PRACTICES ACT**

**July 15 2019**

**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. Therefore, we applaud the government's decision to provide the public with an opportunity to help re-shape forest policy. Changes to the Forest and Range Practices Act (FRPA) must reflect the urgent need to manage our water and, as much as possible, our climate.

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 town of 5300 has now borrowed \$9M to help pay for a \$24 M water treatment plant, an expensive and incomplete fix to no source water protections in our 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, drought 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.

**Consider this: has any other BC ministry or its related industry spawned so many local organizations focused on one thing: fighting the negative impacts of clear cut harvesting on their communities?**

## **DIRECTORS:**

Co-Founder: Joe Klein

Co-Founder & Coordinator: Taryn Skalbania

Co-Founder & Field Work: Cory Sutton

Communications: Patricia Dunn

Treasurer: Val Macgillvary

Director & Secretary: Ann Sutherland

Director: Norman May

Director: Jessica Klein

**PWPA VISION:**

A universal understanding that water is our most precious value 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 in the Current FRPA regulations; however, in the true values of a forest, this grove of Aspen contribute to the watershed ecosystems including **Fresh water**. Ecosystems play a vital role in the global hydrological cycle, as they regulate the flow and purification of water. Vegetation and forests influence the quantity of water available locally, and the micro climates created by our interface forests make our communities liveable.

**PWPA 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. Education** - Educate the Peachland community and beyond, and engage public officials (municipal through to provincial government) about key issues regarding water use and healthy water practices in the watershed. In addition, raise awareness of more sustainable forestry practices in respect to both logging and processing.

**Priority 2. Forest Watch** - Reduce the threats and mitigate the damage 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. This will

be done with an eye for protecting, in particular, the more pristine area of the watershed from Pennask to Spring Lake with special attention given to road density and future planned logging.



Photo: Up to 750 calf cow pair range in our drinking watershed free to roam through all lakes, creeks and streams. We have seen no evidence of watering stations or barriers to protect shorelines. This free range practice may work in some jurisdictions but a community watershed needs more protections. The above photo show range cattle, first at one of our source drinking water lakeshore, at Spring Lakes, and second less than half a kilometer form 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 Ace. 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 FRPA, the community, little.

**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
- Education

#### **VIDEOS:**

This selection of videos will serve as a backgrounder and focus our message, they are all quite brief and we trust you view them as an asset to this paper.

#### **1. Logging in the Peachland Community Watershed Reserve, Time-lapse 1984 - 2018**

YouTube, by Will Koop, B.C. Tap Water Alliance ([www.bctwa.org](http://www.bctwa.org))

<https://youtu.be/Rs5e8VOF6s0>

#### **2. Short Time lapse of Peachland and Trepanier watershed deforestation**

[https://www.youtube.com/watch?v=vRpq0Hr01\\_4](https://www.youtube.com/watch?v=vRpq0Hr01_4)

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.

#### **3. Here you can find the [link of the video](#) we just finished. **Field work and wetland assessments by PWPA at Wilson Lakes**, formerly a 70 year old Nordic trail network and rich wildlife refuge, now clear cuts affect our community values of recreating, hunting, fishing and wildlife viewing.**

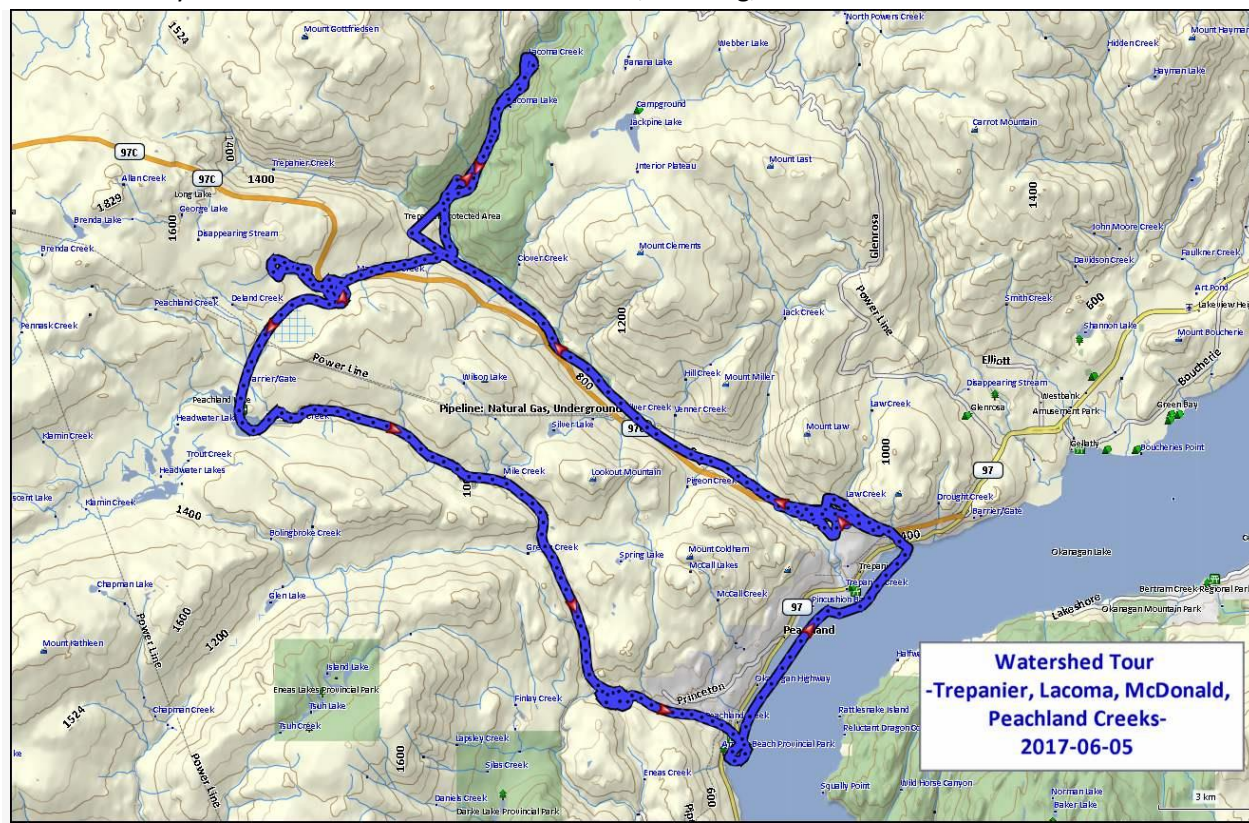
[https://www.youtube.com/watch?v=yAm3uLP\\_7Bo&feature=youtu.be](https://www.youtube.com/watch?v=yAm3uLP_7Bo&feature=youtu.be)

#### **4. Intro to the 8 min Heli Tour over the Peachland Watersheds** <https://youtu.be/nngeV9zeGqk>

Our members toured their watershed immediately after 2 costly mudslides that immobilized our



water intakes and water treatment plant, 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 FRPA REVIEW?

The BC government admits the purpose of the FRPA review is to invite Indigenous Nations, communities, industry stakeholders and the public to offer their perspectives on the sustainable management of B.C.'s forest and range resources. PWWA hopes our public engagement helps inform improvements to the Forest and Range Practices Act (FRPA) that will support the health and sustainability of B.C.'s forests and rangelands, while strengthening public confidence in how these vital resources are managed. The public has lost trust in the government to manage its assets. As the 'owners' of the crown land, the taxpayers have allowed the government to act as 'landlords' of our forests, the logging industry and licensees are our 'tenants', and in the past the landlords have not been adequately monitoring the tenants as they mine our natural resources. This business as usual timber harvesting and cattle ranging needs immediate attention now that society values are changing and climate crisis is present. The forestry industry and the forests in BC are in crisis, let us act like it. The FRPA framework defines how legislation, regulations and policy work together across the landscape. It governs on-the-ground forest and range activities but unfortunately the community voice has not been listened too. Had it been over the past few decades this review may

not have been 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 challenges with FRPA, the threats to our forests and conflict of interest issues of the Professional Reliance Model. THE COMMUNITY PERSPECTIVE: In fact we, the PWPA are but one of many, hundreds in fact of non profit groups that have rallied to the to voice concerns and complaint about the ministry of forests, can any other ministry make this claim, 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. The prescriptions in FRPA can no longer be like a cook book; the recipe for changes to our landscape must be done watershed by watershed, not from the Timber Supply Area land base but smaller, more natural landscapes where cutting decisions (if any) are from the local point of view, not from a province wide prescription, and the Annual Allowable Cut, again if necessary

#### THE INDIGENOUS NATIONS PERSPECTIVE:

The government is also promising that by updating FRPA it will meet goals for reconciliation with First Nations. It's vowing to be more inclusive when it comes to consultations over land use and logging. : The terms of this FRPA review emphasises first Nations involvement and wish to acknowledge the PWPA full support of a local syilix nations efforts in this area, led by the Penticton Indian Band natural resources branch and supported by Westbank First Nations forestry and Ntityix Resources, these Okanagan peoples are writing their own forests an range guidelines, this localized landscape management plan is exactly what is needed all across BC, regionalized regulations with input from the communities that are affected by industrial activities in their watersheds. Known only by a working title, ***"The syilix Forestry Standards for Forestry Applications within the syilix nation territories"*** is the Indigenous Forestry Practices document Penticton Indian Band and Westbank First Nations, amongst other syilix members are drafting/working on harvesting practices. A few of the guidelines they will be working towards, are riparian management roading, roots and berries and practices like keeping 5 largest trees in any area farmed. The syilix follow the 30/70 % rule in all harvesting whether trees, berries or fish and follow the syilix stewardship model and declarations of water rights. PWPA would like to mention support of our local FN licensee's intentions to better forestry practices. It appears Okanagan FN are moving in the right direction to care for their land, following the other successful Haida Gwaii and Gitanyow land management plans.

#### THE GOVERNMENT PERSPECTIVE:

The forestry industry's own watch dog, the Forestry Practices Board, has just recently released a report on forestry practices. <https://www.bcfpb.ca/reports-publications/reports/>

finally, a BC government agency has recognized the gap (missing link) between the political rhetoric and

the on the ground reality. While a new tactical (operational) level of planning could help, a more effective and efficient solution, in some PWPA members opinions, would have been to revoke the BC Liberals 2003 decentralization of operational planning to the licensees.

A newspaper report about this proposed new level of operational planning by the Province, wrote "The board recommends a planning process that takes broad objectives from land-use plans and translates them into a plan for achieving the desired future forest on a specific area of land.

The FPB report goes on to say such a process must:

- \* be inclusive of Indigenous peoples, stakeholders and the public;
- \* integrate all forest values;
- \* be place based and forward looking;
- \* be embedded in the forest management system; and
- \* include monitoring and continuous improvement over time.

" The need for landscape-level planning is more critical now than at any time in the past, as forest resources are increasingly affected by the cumulative effects of multiple developments and natural disturbances due to climate change," the author said. "Let's hope Minister Donaldson pays serious attention to this Forest Practices Board report." We at the PWPA fully agree with these findings. Some aspects of B.C.'s FRPA model is a crass, colonial approach to ecosystems and the societies that depend upon them.

*"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*.

*"The way that 'sustainable' cutting rates are propped up is by cutting socially and ecologically sensitive areas, like domestic watersheds and steep slopes."* Forest Practices Board special investigation on community watersheds (FPB/SIR/40): <https://www.bcfpb.ca/reports-publications/reports/community-watersheds-from-objectives-to-results-on-the-ground/>



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.

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

FRPA seems to allow sedimentation of drinking water if it can be treated, as opposed to source water protection. It should be changed to source water protection.

A couple of excerpts from the FPB report:

Investigators found the FPPR's objective for community watersheds, the exemption conditions and the water quality practice requirement, are too limited in scope or unclear. As it pertains to water quality, the objective only applies after the water is subject to treatment (if treatment is required), which implies more emphasis is placed on treatment than source water protection. Also, the primary drinking water practice requirement does not necessarily include sediment as material harmful to human health. This must change in FRPA as far as all community drinking watersheds are concerned.

The objective applies to water quality "from" the waterworks and water quantity and timing of flow "to" the waterworks. It is unclear what government intended by setting the objective of water quality "from" the waterworks. The result, however, is the objective seems to emphasize water treatment at the waterworks instead of source water protection. In other words, if the objective stated "to the waterworks" there would be an implied emphasis on protecting source drinking water before it reached the waterworks

## 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, but some may be anti bad logging practices, over logging and poorly developed logging. 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:

On establishing another direction for BC forest policy, Bob Williams in his January 2018 "Restoring Forestry in BC" report said this solution was better governance ( i.e. decision making). PWPA agrees. Bob Williams advocated:

- (1) BC Forester General to be above politics;
- (2) Co management of BC public forests with First Nations;
- (3) Regional Committees of MLAs to advocate for regional adaptations of forest legislation (e.g. BC has 12 of 15 different forest ecosystems in Canada) under a general set of policy principles from the Forester General; and
- (4) Decentralization of forest planning and operations on public BC forest land to the Regions by transferring responsibility from forest companies to (perhaps) Regional Districts.

<https://www.policyalternatives.ca/publications/reports/restoring-forestry-bc>

#### **TENURE, TIMBER SUPPLY AREA, ALLOWABLE ANNUAL CUT:**

The PWPA is aware the above 3 issues fall under the *Forest Act* are beyond the scope of this review, however, we believe they need mentioning on all occasions.

As with location, location, location being about real estate, climate change in B.C. is about water, water, water". So, if we protect, conserve and manage water as a priority value under FRPA, we will *de facto* be mitigating one of the most widespread effects of climate change in B. C. (drought, flooding and the timing of flow, quantity and quality of water). Good forest practices are much cheaper than engineering solutions. The allowable annual cut and tenure an timber supply areas need to be reviewed fully too, before any meaningful changes can come from FRPA and protect all our forest values.

PWPA challenges industry, labour, and First Nations and communities to work together to develop a new vision for the Interior forest industry at the regional level. This is not a Victoria-imposed solution. It is a locally developed vision for the future based on local timber supply areas. Before conventional timber supply planning occurs, ensure that short and long term resilience and renewal patterns and processes are assessed, planned and managed at the eco-region (policy) and landscape (watershed) Level, before operational issues at the site level is addressed.

#### **ANNUAL ALLOWABLE CUT:**

We know that when left intact our older-aged forests manage our water and help protect us from climate extremes especially because of their carbon storage capacity. Clear-cutting and associated logging practices destroy the composition, structure, and natural function of forests including managing

water and climate. New tree plantations struggle to establish themselves; whether or not they attain the status of a forest with all of the complex ecosystems they are comprised of is a question we won't know the answer to for a long, long time. Certainly, the current practise of 80-year rotations in our interior forest is foolhardy to say the least. With these issues in mind, surely we are obligated to agree that forestry practices must focus on the resilience, renewal, and complexity of ecosystems rather than Allowable Annual Cut considerations.

**NON TIMBER VALUES:** PWPA recommends that all values of the forest be treated equally, all supply health benefits, habitat, jobs, income, benefits, etc. So NO single FRPA value can supersede another; all must be protected so as to not "unduly reduce the amount of that value period, not just timber.

**COMMUNITY WATERSHEDS:** 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. This model self regulation model needs to be changed further, with more community involvement, government monitoring, and less industry results based driven. We need to include climate change, cumulative effects and species at risk regulations in all community watershed harvesting plans. We ask that the Ministry of the Environment move ahead with speed and decisiveness on its legislation for species at risk as soon as possible

Many in Peachland believe professional reliance has harmed our watershed, almost past repair. 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.

#### CARBON SEQUESTRATION:

The banning all old growth logging is supported by PWPA- the roles of old growth as hotspots of carbon sequestration and biodiversity are critical and essential in this time of climate change and biodiversity collapse. We insist on ecosystem based planning for all forests in the province. How about we take climate seriously and instead of just calling it an emergency act

like they did in the last global emergency, the idea of forming a wartime style coalition government with effective mitigation being the agreed prime goal is worth addressing.

Hopefully this government would cease to manage B.C. forests for timber with health and carbon storage being the new management framework. Such a coalition government with such a mandate could void long term contracts for wood and help organize a 'no one left behind' transition. for the forestry example of the 'war effort' needed,

**OTHER PROPOSED CHANGES TO FRPA FROM PWPA AND LOCAL OUTDOOR ENTHUSIASTS:**

- 1- Design blocks (size and shape) such that area beyond 200m from cover is minimized; Wildlife Tree patches minimum 3-5 ha.
- 2- Develop clear WTP parameters that are separate from environmentally sensitive retention requirements.
- 3- Preserve integrity of riparian complexes by not harvesting and maintaining functional screening cover (>200 m along all edges).
- 4- Cut and leave patterns that provide connectivity between riparian/wetland areas with 5m height security cover at least 100m wide.
- 5- No harvesting, thinning or brushing 30m either side of main haul roads.
- 6- Branch and spur roads should be deactivated and rehabilitated ASAP or within 12 months.
- 7- Branch and spur roads that aren't deactivated should retain 30m of screening cover.
- 8- Permanent removal and replanting of non-status roads back into the timber harvest land-base.
- 9- No roadside processing off of existing roads where there's an existing buffer.
- 10- Retention of fire and beetle killed timber for cover and structure.
- 11- Retain all non-merchantable timber within log blocks.
- 12- Reinstate the practice of "in-block' broadcast burning.
- 13- Selective logging on Winter Range based on restoring and maintaining historic ecosystems.
- 14- Restocking species and densities based on restoring and maintaining historic ecosystems.
- 15- Prohibit the use of herbicide treatments for silvicultural practices.
- 16- Maintain live forest cover within and adjacent to burns and riparian areas.
- 17- Leave large woody debris in cut block.

Below is an outline of a few basic ideas pertaining to the forest industry in relation to wildlife / biodiversity which the Stewards may wish to consider in the early stages of its advisory group. These are things which I feel will bring the greatest benefit at least amount of cost.

Reduction of road density

- High road density may very well have the greatest negative impact on (at least) the larger wildlife species in BC. It is not just a forest industry issue, but one that will also need to be addressed by oil & gas and the mining sectors.
- How can the industries be incentivized and/or legislated to reduce road density? One concept may be to post an environmental bond for each kilometer of road constructed which will only be released upon full deactivation. Another concept is creation of an access management plan for

review and approval at time of each cutting permit submission. It would become a legal requirement to fulfill the obligations outlined. There currently is no obligation to plan access and plan deactivation which is a big gap in our system.

- OUR OWN PROVINCE GOVERNMENT REPORTS GIVE US GUIDES TO FOLLOW IN A COMMUNITY WATERSHED BUT LICENSEES AND FSPS DO NOT FOLLOW THESE GUIDELINES

<https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework/values>

Benchmarks • < 0.6 km/km<sup>2</sup> (low) • 0.6 – 1.2 km/km<sup>2</sup> (moderate) • > 1.2 km/km<sup>2</sup> (high)

- **Increasing road density** increases exposed surface materials to erosion while peak flows may be magnified as road density increases because roads act as surface drainage. A subset of indicators calculated did not have defined benchmarks associated with them due to uncertainty in available research, absence in research, or uncertainty in subject matter expert opinion. These indicators are considered and presented as supporting context for the core indicators with defined benchmarks. 8 networks that increase runoff. During heavy precipitation or snow melting events, roads increase flow concentrations into streams. For example, ditches intercept sub-surface and surface flows, and roads reduce infiltration and transfer flows to the ditches, which then are rapidly transported to nearby stream channels. Road density can also influence low flow and water temperature by increasing surface runoff and modifying subsurface flows. Roads may also increase coarse and fine sediment delivery to streams depending on surficial geology and terrain stability. Indicator • Total length of roads divided by the total watershed area (km/km<sup>2</sup>) NOW WE HAVE 500+ KMS N PWPA ASSESSMENT AREA

**Peak Flow Index (% of watershed area)** Scientific Context Peak Flow Index for the purpose of this version of the protocol is the assessment unit-area normalized score calculated from Equivalent Clear cut Area (ECA). Equivalent clear cut area (ECA) is a modeled metric that attempts to relate the influence of forest cover disturbance (e.g., clear cuts) to changes in stream flow. ECA includes the area of land that has been harvested, cleared or burned, with consideration given to the silvicultural system, regeneration growth, and location within the watershed. It expresses the relative hydrologic impacts of disturbed forests compared to mature intact forest canopy, and 13 reflects complex changes in flows resulting from changes in canopy precipitation interception, evapotranspiration, snow melt dynamics and runoff. Indicator • Equivalent Clear cut Area (ECA) within a watershed divided by the total watershed area (%) Benchmarks • < 25% (low) • 25-45% (moderate) • > 45% (high) Note: This is a preliminary risk categorization based on the variable parameter ECA. This indicator assessment should be supported with localized watershed knowledge.

#### Stand conversion

- There is a huge problem in at least the southern portion of BC to harvest Douglas-fir-leading stands and then reforest with lodge pole pine. Douglas-fir is critical for deer winter range but also for many other species. Stocking standards are likely to consider lodge pole pine a 'preferred' species in the majority of the ecosystems which have Douglas-fir which has largely allowed this to happen. The forest companies have converted many thousands of hectares of Douglas-fir to lodge pole pine-leading stands (for economic reasons which I can detail if you wish) which is having a serious long-term impact on many wildlife species and biodiversity in general. The MFLNRORD is starting to take this seriously and criticizing companies which are doing this, but until change is legislated, it will continue. I have had some very encouraging



success in getting practices changed by West Fraser and they have even developed a dry-belt Douglas-fir strategy to ensure Douglas-fir is regenerated on sites which had Douglas-fir leading pre-harvest. Other companies, not so willing to change.....

- Encourage deciduous species in newly-regenerated stands. At least don't keep trying to force the companies to create pure- or near-pure coniferous stands. This is having a huge negative impact across much of BC for moose habitat but also has a negative impact on species such as fisher and song birds. The stocking standards need to be reassessed to address this issue. There has been a huge bias in BC to create near-pure coniferous stands to maximize yields but comes at a price to wildlife / biodiversity. The upside on this issue is that the forest companies will strongly be on board to change this as well.

#### Moose habitat management strategies specifically

- This is probably a good time to zero-in on specific moose habitat management strategies. Moose are getting some serious attention at a high level in MFLNRORD right now. I am working with a new protocol developed for a geographic area north of Kamloops called the *Moose and Watershed Stewardship Pilot Project*. It was a collaborative agreement with MFLNRORD, industry and First Nations finalized in 2015 to deal with impacts on moose and watersheds and came up with some very good ideas on how to mitigate impacts. Many of the concepts are too onerous for the forest companies to be able to achieve in their entirety but there are some excellent ideas presented in this project. I can detail the strengths and weaknesses to anybody whom cares to listen, but requirements concerning enhanced management zones around wetland and lakes, thermal cover, road density, etc have potential for inclusion in planning in much of the rest of BC.

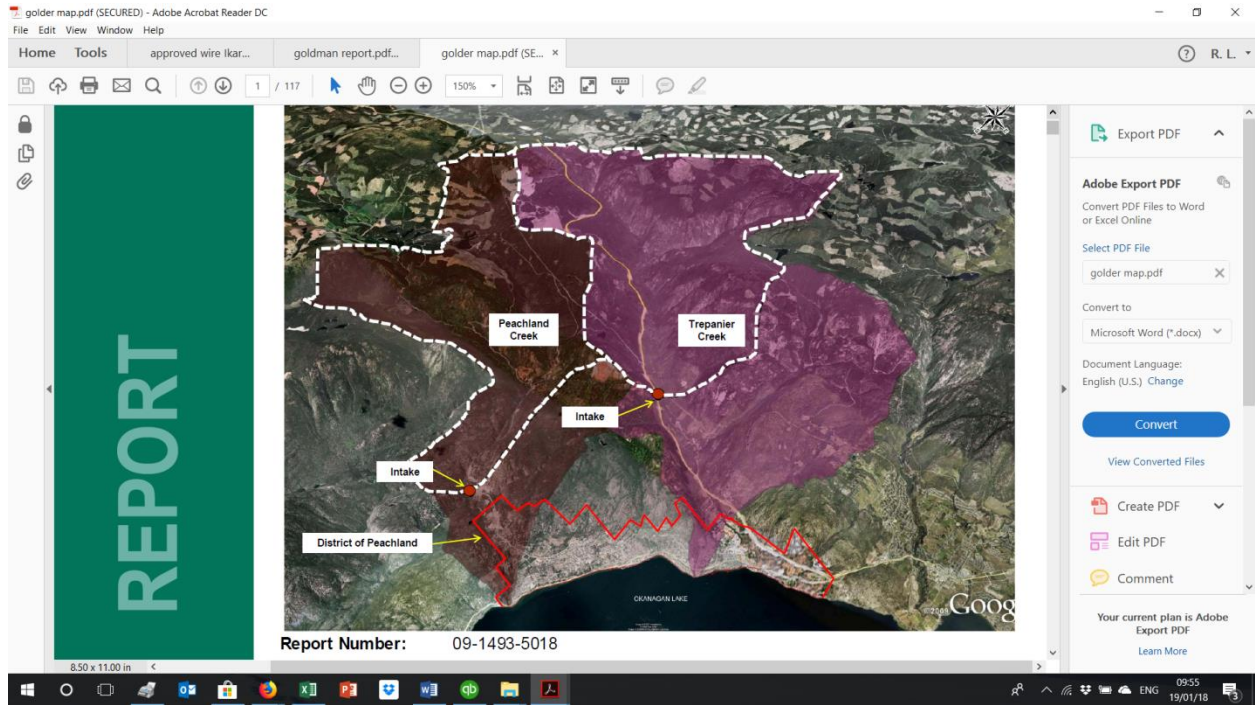
#### Deer winter range GAR orders

- The Kamloops TSA still does not have a Government Actions Regulation order to manage deer winter range. This was in the works over 5 years ago but seems to have been scrapped. Need to find out why. I can detail some of the short-falls of not having such an order, but perhaps strategies can be addressed through the Forest Stewardship Plans? Other Tsars need to address?



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.







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.





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.





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 trains. 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. Local hunters and trappers and guides have left the area, noting lack of wildlife, again outside the scope of this review, we ask Minister George Heyman to fast track B. C.'s SPECIES PROTECTION ACT

**CONCLUSIONS:**

We the PWPA, as the primary owner have expectations and desired outcomes for our Peachland watershed. They are:

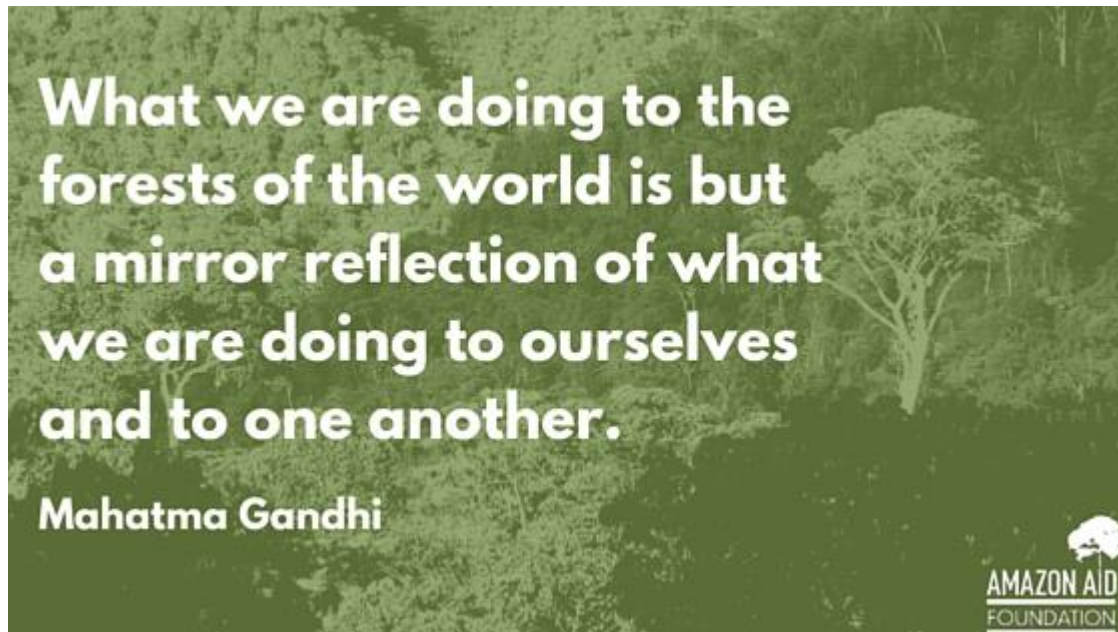
- (a) A high quality of life for citizen's owners (high quality drinking water, vista, recreation, wildlife, etc)
  - (b) An ecologically sustainable forested watershed, with integrity and resilience, and can self renew, and will sustain this high quality and quantity of water supply for Peachland.
  - (c) Build the capacity to connect the sustainable forest, with the high quality of life of the Peachland residents/owners with eco-based planning.
- Community control of the Peachland watershed (like Vancouver and Victoria)
  - Legislated performance outcomes from legislative forestry policy
  - Sound decision making (policy governance)
  - Annual performance scorecard- what is the actual health of our watersheds and is it increasing or decreasing with each clear cut?
  - Provincial and local accountability of policy makers and staff to support the health and sustainability of B.C.'s public forests and rangelands, while strengthening public confidence in how these vital resources are managed.

**CONCLUSIONS:**

We hold rights to forest and range resources. Together, the Act and its regulations are the foundation for competitive forest and ranching industries, partnerships with Indigenous Nations and stability for forestry- and ranching dependent communities, but it must also benefit all other community values too.

If we continue to only focus on a healthy forestry economy, rather than the big picture, a healthy forest where all values are protected and nurtured equally we will continue down this road of unsustainability, non renewable, catastrophe. We are in crisis in BC let's act like it. A famous UBC Classics professor always began his lectures to first year students with ..."**Forests always precede great civilisations, deserts always follow...**" Let us now work towards changing this devastating trend here in BC. Western science, together with First Nations traditional knowledge and community involvement can create a truly healthy forest and eventually a healthy forest economy. Let us put a stop to this massive landscape level experiment of clear cutting our forests to fill our mills, is it not a sustainable farming model it has never been tested before anywhere, nor should be continue to tinker and

experiment here with the natural resources of BC. We must save all the first values.



The PWPA's gratitude for the opportunity to provide input to the May 2019 Minister of Forests, Lands, Natural Resource Operations and Rural Development, Doug Donaldson's " *Forest and Range Practices Act* Improvement Initiative: Renewal and Resilience. Discussion Paper. "2

This is very important work. The people of British Columbia own 94 percent of our magnificent province. The principal challenge to be faced is complexity (ecological, economic and social), and what this means for the prudent management of our assets as in the

Landmark agreements aimed to protect old-growth forests in the Great Bear Rainforest and on Haida Gwaii have made the world see B.C. as a leader in sustainable forest policies. While that is not yet true, we can make it a reality.

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

Sincerely,  
The Board of Directors  
Peachlandwpa.org  
[peachlandwpa@gmail.com](mailto:peachlandwpa@gmail.com)