



Ymir Community
Watershed Society
protectymirwatershed.com

BC Timber Sales
Kootenay Business Area
1907 Ridgewood Rd.
Nelson BC V1L 6K1

Re: BCTS Forest Stewardship Plan Amendment #601

To Whom It May Concern,

March 1, 2020

As per our January 30, 2020 meeting with the BCTS Castlegar office, we are providing input on the Forest Stewardship Plan Amendment #601. Below find our comments on some specific items in the FSP.

Section 5.1: Soils: footnote 3 (page 9)- "For the purposes of this section, 'another high value element' includes a human high-use area or transportation corridor, major utility corridor, consumptive use water source, fish habitat, or other value as determined by a Qualified Professional."

YCWS comment: Communities affected by logging activity in a specific area should have input in determining high value elements, not just determined by a Qualified Professional. The QP/QRP may not have historical, cultural, recreational, or other knowledge of area to be able to adequately determine these values to area users. Bladed/excavated trails: This nomenclature is deceptive as 'trails' for most people implies a structure that is more like a single-person-width walking or biking trail. In reality, BCTS is using this to refer to a 'temporary access structure' that is more similar to a road than a trail: an excavated feature which would allow large heavy machinery to access an area. This terminology should be updated to more accurately describe what is being created to avoid confusing the public.

As well, BCTS informed us at an in-person meeting January 30, 2020 that the only stipulation on the bladed/excavated trail is that it be no more than 30cm deep. It is essential to have a width and length restriction on this type of structure. Again, a clearer definition of terms is required.



Section 5.3.1.7 (page 10): Retention of Trees in a Riparian Management Zone (RMZ)

YCWS comment: The FSP says that as little as 0% of trees need to be retained in an RMZ. In our case, Quartz Creek is classified as S4, so a minimum of 10% of trees needs to be retained in the RMZ. This section is not amended (as there is nothing in red), however we are concerned about the effects of such a low amount being retained and effect on the creek's exposure to sun or other elements that may change the composition of the creek and its ability to withstand temperature or other environmental changes. More study should be done on the effect of reducing the tree cover to so little.

Section 5.4.1.2-a (page 17): 2% Clause

The section states that no hydrological study is required if the area of planned cutblocks and roads in a watershed is 'incidental', ie equal to or less than 2% of the total watershed area.

YCWS comment: This is far too open-ended and can allow cutblocks to be planned so they are equal to or less than 2% of a watershed. BCTS's position as explained to us at the January 30 meeting is that the intent is to allow for spillover of an adjacent cutblock/roadwork into a watershed if the landscape allows it, a decision made by the logging/roadbuilding contractor without the requirement of conducting a hydrology study. This position is not defined in the proposed amendment as such and leaves watersheds vulnerable to contractors operating within a watershed without a hydrological study. There are several problems with this. This 2% may be the most sensitive or vulnerable areas within the watershed to forestry activities. The 2% of a small watershed can be very important and contain vital features that influence its function. In a larger watershed, the 2% can be an immense area that requires proper hydrological assessments as well. In addition, the comment about it being 'spillover' from watershed-adjacent activities is not defined. This could allow contractors or BCTS to redraw planned cutblocks so that the total annual harvest is under the 2% margin. The result could be that 2% is taken each year without the need for a hydrology study. Over 10 years that could lead to 20% of a watershed being logged with no study. This is clearly unacceptable. The intent of this amendment must be more clearly defined to prevent abuse of this loose definition.

Section 5.4.2 (page 17): Consumptive use streams

YCWS comment: There are no amendments for this section, however we are concerned that the importance of consumptive use streams may be overlooked. All consumptive use water bodies should fall under equal protective measures, regardless of the size of the water body or the number of domestic water users on that water body.



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General Comments

We request that BCTS define and restrict the use of acronyms in documents to be reviewed by the public. Clear wording and definitions are important for the understanding and comprehension of proposed amendments and BCTS activities in general. Clearly defined and understandable regulations will prevent abuse of loopholes and will allow the public to better understand the regulations and provide informed input.

We request that BCTS be required to conduct thorough, peer-reviewed acid rock surveys of all planned road building and any other excavation that would disturb rock formations in any consumptive use watershed. The effects of acid rock drainage (ARD) are well-documented and known to be exceptionally harmful and long-lasting on water supply, human use, and the environment. The mining industry has strict regulations on ARD; BCTS should be held to a high standard as well due to their excavation activities. In our situation, we have had two accidental discoveries of acid rock in our watershed. At our insistence, BCTS conducted an acid rock study that found indications of acid rock where they plan to put roads as per Operating Plan #17. Had we not pressed BCTS for this, it would not have been found until it was potentially too late. Exposing acid rock in a consumptive use watershed would have devastating effects as the contamination is generally considered to be permanent.

Our local BCTS office admits they have no experience with ARD, which greatly concerns us. Every precaution should be taken to discover and prevent ARD. We look forward to the release of the BCTS acid rock study of our watershed.

Please contact me if you have any questions or need further clarification. I can be reached by email at ymirwater@gmail.com.

Sincerely,

Velvet Kavanagh
Executive Director
YCWS