



Slokan  
Valley

Watershed  
Alliance

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*Received  
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A presentation to

The Hon. Dave Parker  
Minister of Forests

On Proposed Policy and Procedures  
For The Replacement of Major Volume-Based Tenures  
With Tree Farm Licences

by

Slokan Valley Watershed Alliance  
March 6, 1989  
Nelson, BC

Greetings, Mr. Parker, and welcome to the Kootenays.

The Slocan Valley Watershed Alliance represents several thousand water users who belong to 12 watershed protection groups from every part of the Slocan Valley, including the villages of Silverton and Slocan. Virtually all of the drainages from which our members draw their water are within Slocan Forest Products' Timber Supply Areas or in Small Business Program supply areas.

To begin, Mr. Parker, the Alliance would like to go on record as opposing the extension of corporate control over BC's public forest through an increase in the number and size of TFLs in the province. Secondly, because we are seriously concerned about present management of the forest land base in BC, we join the list of others who have called for a full-scale inquiry into forest practices in the province.

The Slocan Valley Watershed Alliance began as a forestry/watershed study group in 1981 to prepare submissions for the Slocan Valley Development Guidelines. One of the major challenges of the Development Guidelines was to formulate a planning process for land use activities in rural watersheds.

Over a quarter million dollars of taxpayers money was spent to develop these guidelines between 1981 and 1985 when they were officially adopted by the Regional District of Central Kootenay and the provincial government. An Integrated Watershed Planning Process made up one-quarter of this document. Its goal, as stated in its introduction, was to guide the preparation of watershed management plans that would give primary consideration to the protection of water quality, quantity and timing of flow. But this planning process was incomplete in one critical area: the technical guidelines necessary to meet this objective were missing. The document clearly stated the need to develop provincial technical guidelines to deal with information needs, data interpretations, technical issues and management issues related to rural watersheds.

Since 1985, the Alliance has been engaged with industry and government personnel in various attempts to refine this watershed management process. To date these attempts have been only marginally successful. There are still major issues which need resolution including: adequate analysis of the risk to water posed by logging; adequate planning and operational standards to protect water; alternatives to clearcutting, slash-burning and pesticide use; liability coverage for damage which might result from logging; and clarification of the roles of participants in watershed planning.

This valley saw a lot of selective logging activity from the 1920's to the 1950's by small operators feeding a number of small sawmills. This left, for the most part, a productive, healthy, mixed forest.

In contrast, the more recent logging that surrounds the Slocan Valley, including logging within existing TFLs, is full of examples of huge clearcuts on steep slopes that have badly eroded. The heavy rain and snowfall in this area have carried massive amounts of soil and debris from these clearcuts into the creeks that flow through and below them. A large percentage of these clearcuts, some dating back to the 1960's, have not been successfully restocked with trees. Many have been left so long that they are full of shrubby, deciduous growth as the plant community has adjusted to the removal of the forest. Attempts by your ministry and industry to use herbicides in these areas have met with much opposition in the Kootenays. Indeed, our regional district directors have declared the Central Kootenays a pesticide-free zone at the insistence of their constituents.

Surrounded by this evidence of highly questionable forest management, Slocan Valley residents are now contending with the encroachment of these logging practices into the main valley corridor and into their watersheds.

At public meetings and in various other forums, SFP and your ministry have attempted to convince residents that these practices are a thing of the past. We are told that increased levels of data collection and more intensive planning are now in place and that management prescriptions are much more sensitive to site specific considerations. "Trust us," the company and ministry are saying.

But let's look at two examples of logging in the Slocan Valley in the past two years.

In the spring of 1987, after approval of its cutting plans by your ministry, SFP clearcut three small patches of timber on Ranch Ridge, just south of the community of Hills. Two of these clearcuts were in the top ends of steep gulleys that led down to Slocan Lake, crossing Highway 6.

On February 12, 1988, less than one year after logging, snow avalanches occurred in both these blocks gathering enough momentum to rip out trees and run for 3000 vertical feet. One of these debris torrents deposited a small mountain of trees, snow and mud on the edge of Hwy. 6, while the second stopped a few hundred feet above the highway.

Exactly two months later, on April 12, a second slide, consisting mainly of mud and organic debris, ran down one of these same gullies, this time crossing the highway and the railway track and flowing into Slocan Lake.

Investigations into these events by ministry and industry personnel cited lack of attention to the maintenance of drainage networks, inadequate drainage structures along the roads within the cutblocks, location of landings in high risk areas, and the failure to assess the avalanche hazard that would be created by these clearcuts. These blocks were on steep slopes, immediately above a public highway, and the avalanche hazard was not considered.

Assurances from your ministry personnel, that logging in our watersheds under the present Integrated Watershed Management Plan (or IWMP as it is affectionately known) would be more carefully planned and carried out, have not held up either. Springer Creek, a water source for the Village of Slocan, has been managed under an IWMP since 1987. Even so, the first area that was logged, again by SFP, ended up being 10% larger than the maximum allowed, and it had an area of disturbed soil that was double the maximum allowed.

Can we expect improved planning and management of our forest land under TFL tenure? Where is the evidence to support this assumption? It is certainly not in the logging that surrounds us. And what if these poor logging practices are continued under a TFL? The province has never revoked a TFL despite at least one recommendation by the provincial Ombudsman to do so. Moreover, if the province does wish to regain control of these lands, they will have to be bought back from the companies although they were originally given away.

Under a TFL, company foresters conduct their own forest inventories and determine their own annual allowable cuts, subject to approval by your ministry. With companies operating in a business environment where record profits are being made while record volumes of timber are being cut, can we expect company foresters to prescribe anything less than an AAC that will meet the full market potential of their companies? We think not.

The present rate of harvest is already beyond what is sustainable. Five years ago, in the Nelson Forest Region, the age at which a tree is considered mature enough to be cut was lowered from 120 years to 80 years because of the rapid depletion of 120 year-old stands. Slocan Forest Products, in the last 10 years, has multiplied its production levels while cutting the number of mill jobs in half. We are losing our forests and our jobs at an increasingly alarming rate.

The replacement of TSAs by TFLs will give the large corporations which control the BC forest industry access to even larger pools of capital because of their more secure tenure. The inducements in your proposal to encourage tree farm holders to build secondary manufacturing facilities seem very weak. What we are likely to see is a continued expansion of primary manufacturing with ever-increasing pressure to cut higher and higher volumes of wood. This pressure, to get the wood to the mill as quickly as possible, is already the driving force behind planning for the forest land base, even in our watersheds.

As we have illustrated, despite present levels of scrutiny by your ministry, the forests in this area are suffering from a serious lack of attention to good management procedures. Your TFL proposal, which calls for a drastic reduction in the role of the Forest Service in overseeing our public forests, is analagous to leaving the fox to guard the henhouse.

Given this situation then, the Alliance takes the following positions:

- 1) We oppose the diminishing role of the BC Forest Service in the management of the public forest and the turning over of this responsibility to commercial interests. It is highly unlikely to result in improved forest management for the long term. We, therefore, do not support the proposal to turn TSAs into TFLs.

2) If the BC government is taking this move as part of its attempt to downsize provincial government agencies, it should consider turning over management of forest lands to the local community in the form of community, municipal, or regional TFLs. We believe that residents of an area, who have genuine interests in both the short and long term viability of their forests and the economic and social health of their communities, would be more likely to assure good forest management. Our Alliance has filed an application for a TFL covering the Slocan Valley. Although your ministry has thusfar refused to consider our application, we request that you do so.

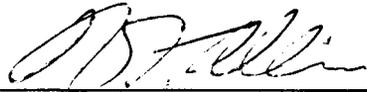
3) In the event that a proposal is considered to include the forest lands in the main corridor of the Slocan Valley in a commercial TFL, all Slocan Valley watersheds that supply, or have the potential to supply, domestic and irrigation water should be excluded from such a TFL. This is in line with the proposed policy issued by your ministry in July, 1988, which reads in part: "TFL proposal areas should not include extensive areas where non-timber resources are the predominant values." Instead these lands should remain under the Jurisdiction of the BC Forest Service to be managed as community watersheds where, according to your ministry's policy of October 1987, "...first priority in all decision-making processes (is given) to the protection of water quality, quantity, and timing of flow." We note here that all of the licensed watersheds in BC comprise less than 5% of the forest land base.

4) Our members also strongly value the visual and aesthetic integrity of the Slocan Valley and are on record as opposing any further clearcut logging within, or visible from, the main valley corridor. Such a prohibition should be included in any harvest prescriptions in the Slocan Valley, whether under a TFL, TSA, Small Business sale or otherwise.

5) Before any further watershed management plans are undertaken in the Slocan Valley, it is imperative that the aforementioned technical guidelines be refined to the satisfaction of all parties concerned. The issues that have been identified must be resolved if the ministry's IWMP process is to have any hope of being effective and adequate to protect water. Given the province-wide need for an adequate IWMP process, we request, Mr. Parker, that you establish a suitable forum for dealing with these issues. The inability of your district and regional personnel to enter into serious negotiations in these matters has led to a stalemate in watershed planning in the Slocan Valley.

Finally, Mr. Parker, we would like to say that although Slocan Valley residents have been working for improved watershed and forest management for many years now, we are prepared to continue working for many more years. We care about our water and our forests, sir, and we are prepared to do whatever is necessary to protect them.

Thank you for this opportunity to present our views.



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Richard Allin  
Co-chairperson

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Herb Hammond  
Co-chairperson

March 6, 1989