

July 8, 2019

To whom it may concern,

**In reference to feedback on the review of Private Forest Land Management in British Columbia.**

I ask you to bear with me as I describe a unique and complicated piece of private forest land located on District Lot 3059 within the Terrace Kitimat Airport Authority Lands and owned by the forest company "All West Trading". This property is located on the south west side of the airport in an area well away from the operation of the airport, in fact more than 1km away with a public road in between and a BC Hydro transmission line separating this private land with a very large, recently logged setting from the outer boundary of the airport.

This private land is located within the Thunderbird Forest Area in the Lakelse River Watershed that myself and many people I associate with assumed was crown forest land. To my surprise and dismay the transfer of this property took place in 1986 with little or no fanfare. Recent events suggests that there could be some connection to the Terrace Kitimat Airport Authority by way of a provision of a CN Rail right of way through the lot and on to the City of Terrace Industrial site south of the airport that was forest crown land transferred by the Province of BC to Terrace in the mid 2000's.

All of the above is a very complicated and I am not sure if any public consultation ever took place in 1986 over the transfer of Lot 3059 to All West Trading. Was it a transfer of private land or was it crown forest land? I know it was not widely advertised otherwise someone would have spotted it and talked with people who shared my concerns even though it was many years ago.

I am still searching for answers over the relationship All West trading has with the Airport Authority (AA) and I wonder whether the AA had any influence over the logging plan. The question is, "has the public interest been circumvented in order to solidify an agreement with CN Rail?"

Regardless over what has transpired over time the current situation has evolved into a logging plan where-by a drainage system plan for the setting is comprised of a number of deep ditch's alongside each spur road that trains the runoff water in two directions over the marine clay sub-soils dominant throughout the forest area. On the south side of the setting, water will flow into the north fork of Mink Creek a tributary of the Lakelse River and into Alwyn Creek on the north side that drains into the Skeena River. The ditch's could cause a disruption to the natural drainage pattern of the site by creating more flow velocity, erosion and more sediment deposition into the two tributary streams.

I sent a complaint report to the FLNRORL Natural Resource Law Enforcement Officers with the Compliance and Enforcement Branch in Terrace who investigated my concerns and reported

back to me. They agreed with my assumptions but cannot do much about the situation unless there is damage to the fish bearing water bodies. In other words their hands are tied.

**My recommendations:**

Crown Forest Land should not be sold to private forest companies unless it is to be transferred in the public interest for the construction of a sawmill or other facilities to create value added products and so on.

The rules and regulations for private land logging should be as stringent as logging on crown land because such logging will inevitably impact upon a public resource. For example, wildlife may use such land as winter range or there may be an important marsh on the property that waterfowl and aquatic wildlife are dependent upon. On a more broadly based scale ecological attributes will always be affected by logging. Birds, animals and fish do not know about borders or the status of the land.

If a private land forest company is unable or unwilling to rehabilitate and or replant a logged off private site the land should revert back to the crown. Climate change is demanding the need to replant and rehabilitate logged off forest lands to increase the uptake of carbon dioxide from the atmosphere by the new trees.

My family owned 20 acres of primarily forested land along the Skeena River and we know from actual experience and interest that everything we did created an impact, sometimes good because we cared and other times not so good because we were living on the property and our cutting of a tree, constructing a foundation for our home, creating a roadway or a septic field all changed the ecology of our property.

It is crucial for public consultation to take place that is open and explanatory and not tied up in legalized and or professional language. The advertising for a logging plan etc. should be in a section of a newspaper or through an online news source that is open, easy to spot and to take notice of. I understand there is a limit over what can be done to satisfy the democratic process. A notification in the legal column of a newspaper or on line has a place in the process but does not garner the attention that is needed, in fact it tends to discourage interest and involvement because the lack of meaningful explanation. Most business, government departments and authorities are likely happy fewer people are involved in examining notifications which makes approval of a plan, a purchase or transfer of a property etc. quicker and easier for the proponent.

As an addendum I have also included an attachment which is a letter I sent to the Terrace Standard expressing my frustration over the All West Trading logging setting in the Thunderbird Forest Area.

Thank you for allowing this process to take place.

Respectfully

Jim Culp

Letter to Editor Terrace Standard

## Logging in the Thunderbird

On Saturday April 20, 2019 Rob Brown and I fished the Lakelse River in the Thunderbird Area. Water and weather conditions were perfect, with the first varied thrush singing their spring mating call in the 1000 year old ancient forest along the river. Walking under those giant trees made up for the poor fishing.

Through the Kalum Land and Resource Management Plan, approved in 2002, two forest management zones were created parallel to the river. Subzone 1 is where no development or timber harvesting is allowed in a 200 meter strip on each side of the river. Subzone 2 is a much wider 1 km. strip on both sides of the river where small settings and selective harvesting are the only form of logging that are allowed in order to preserve the integrity of this ecologically sensitive zone in the most productive watershed in the Skeena River system.

With more and more pressure to log every piece of old growth forest in BC, Sub-zone 1 should be fully protected as a conservancy or a protected area. Walking trails should be the only access other than vehicle access for special use fishery and First Nation Cultural reasons. What prompted this letter was the contrast between the ancient forest and a recent ugly, logged off setting along the Thunderbird main forest road between the BC Hydro substation and the north fork of Mink Creek.

The setting, within a second growth plantation where only a few truly merchantable trees were available, should have been left for probably another 20 years or so before being cut or at worst selectively logged with small machines or horses.

My understanding is that the forest massacre is located on private land or as well it could be a Forest License area. Ownership does not exempt the operator from stringent rules such as logging through small water courses, in this case tributary to Mink Creek.

The setting is located over the very sensitive marine clays in the watershed and should not have been clear cut (for a second time) after past logging caused so much fish habitat destruction. It is a reminder of the old style, clear cut logging of the past century. What consideration was given in this logging plan to minimize soil instability and prevent sedimentation buildup as a follow up to the large land slump brought on by first growth logging that decimated the lower half of the north fork of Mink Creek?

During its prime pre-logging era Mink Creek may have been the most productive fish bearing tributary in the Lakelse Watershed. It is now normally a grey, silt laden flow of water in its lower reach's with a marginal fishery habitat. After fishing we looked at the creek and again it was its usual turbid grey with zero visibility on a day not after a rain or a snow melt off.

Over my 65 years of involvement, in unison with many organizations and people who cared and fought against bad forest practices and logging in BC all thought the corner was turned during the mid 1990's when the NDP Government introduced the Forest Practices Code. Our optimism was short lived due to the Forest Industry determination to reverse that positive direction. The Industry despised the code and lobbied hard for a change. After the 2001 election and during the Liberal Provincial Government era they got their wish. A new way of doing business was introduced through the Forest and Range Practices Act which gave the industry much greater control over management and harvesting of our forests. Coincidentally and bad news, over that period and to this day the Provincial Forest Service, Ministry of Environment/Forests, Lands and Natural Resource Operations and Rural Development, and the DFO experienced serious reductions in their staff delegated to look after our forest, fish and wildlife resources.

It is time for a moratorium on logging and complete review of how forest management is practiced in the Thunderbird Forest area, particularly the marine clay area to prevent any further degradation of this important watershed.

Jim Culp Director BC Federation of Fly Fishers and Council of Canadians Terrace Chapter