

# Friends of the Nemaiah Valley

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## **PRESENTATION BY FRIENDS OF THE NEMAIHAH VALLEY IN RESPONSE TO THE CARIBOO/CHILCOTIN REQUEST FOR INPUT INTO DEVELOPMENT OF A CONSERVATION STRATEGY**

*Friends of the Nemaiah Valley* (FONV) welcomes the opportunity to provide input into a conservation strategy for the Cariboo-Chilcotin Beetle Action Committee (CCBAC).

FONV is an environmental organization that was registered as a non-profit society under the B.C. Societies act in 2000. We have members and supporters in the thousands throughout Canada and internationally because of our work to protect the environment of the Nemaiah Valley and surrounding area. We work closely with the Xeni Gwet'in First Nations Government (XGFNG) and have signed several co-operative Protocol Agreements with XGFNG.

In 2002 we produced a research document, PRELIMINARY CONSERVATION ASSESSMENT of the RAINSHADOW WILD HORSE ECOSYSTEM, Brittany Triangle, A review of Grizzly and Black Bears, Other Wildlife, Feral Horses & Wild Salmon, prepared by our consultant, Wayne McCrory, RPBio. As a result of the report recommendations, the XGFNG declared the ?Elegesi Qiyus Wild Horse Preserve over approximately 800,000 hectares of their Caretaker Area, including the 155,000 ha. Brittany Triangle.

We have enclosed a print copy of this report. It can also be viewed on our web-site at [www.fonv.ca](http://www.fonv.ca).

Public response to, and support for, the creation of the Preserve, has been outstanding. It has received media attention in the Globe & Mail, Vancouver Sun, CBC TV, CTV, CBC Radio and CKNW, to name a few. Supportive articles have appeared in Westworld Magazine, B.C. Magazine, Canadian Geographic and Animan, among others. The story of the creation of the ?Elegesi Qiyus Wild Horse Preserve, and of the Xeni Gwet'in struggle to have control of their Caretaker Area recognized, has been told in the film Wild Horses, Unconquered People. This has appeared on CBC Rough Cuts, at the Banff Film Festival, and can be seen regularly on the Discovery Channel and Knowledge Network.

This is by way of background.

Our continuing conservation activities are as follows:

1. We engage in and support wildlife **research** within the wild horse preserve. Following on from the Preliminary Conservation Assessment, we have developed a large volume of documentation related to wildlife inventory, habitat and habitat use of the entire Wild Horse Preserve. We use remote cameras, ground truthing, wild horse trail mapping using GPS, and conduct an annual aerial survey of wild horse and moose dispositions and numbers. We plan to prepare a completed conservation assessment within the next few years. FONV conducts our own DNA research into the genetic origins of the Brittany Triangle wild horses. We want to determine if this relatively remote and isolated herd of 200 to 300 horses is descended in any degree from the Colonial Spanish Horse. To complement our archival and behavioural evidence we have collected nine blood samples and over fifty hair samples. Preliminary results from the blood sample analyses have already determined some genetic linkage. We expect a final report from Texas A.& M. University within a matter of months.

FONV offers logistical support and guiding/guidance to researchers who wish to do wildlife studies or pursue other areas of interest. Currently we are providing support for a doctoral candidate who is developing research on wild horse ecology. We are in discussions with researchers interested in doing a gray wolf study and another research project concerning the place of the wild horse from a legal perspective and from a First Nations cultural/heritage/native law point of view.

2. FONV provides funding and guidelines for a First Nations Wild Horse Ranger. For the past four years we have supported this position in concert with B.C. Parks. Currently, the ranger conducts seasonal patrols throughout the Preserve.

3. FONV does rehabilitation work in the Brittany Triangle. This consists of deactivation of the many kilometres of fireguards that were created in 2003 to fight the Chilko fire, the largest of that devastating season. In concert with the Ministry of Forests, B.C. Parks, and the XGFNG, we have worked out and are implementing an access control strategy for the Brittany Triangle. Following the 2003 fire we worked with our own volunteers to extinguish over one hundred peat fires in the burn area, thus saving several hundred hectares of meadows from destruction. These areas provide the chief grazing areas for the wild horse herd and are used by grizzly bears between early spring and the coming of the salmon in late summer and early fall in Chilko River, Taseko River and Elkins Creek.

For a report commissioned by FONV on the results of the Chilko Fire see Roads to Nowhere, Technical Review of Ecological Damage & Proposed Restoration Related to BC Ministry of Forests Control Actions – 2003 Chilko Wildfire, BC., prepared for FONV by Wayne McCrory, RPBio. A copy of this report is enclosed. It can also be viewed on our web-site at [www.fonv.ca](http://www.fonv.ca).

4. We have worked closely with the Valhalla Foundation for Ecology to enable the purchase of a critical parcel of land at Captain Georgetown. This is one part of a process to protect an important riparian area along Elkins Creek which is important to a significant Chinook run and to grizzly and black bears. In time it is anticipated wild horses will also begin to return to this area – an area they abandoned almost two decades ago following a government instituted bounty hunt.

5. We monitor and document the effects and recovery of land and wildlife following both the mountain pine beetle outbreak of the eighties and of the Chilko Fire. The forest was in a recovery stage following the earlier beetle outbreak, with many healthy young trees taking the place of the beetle killed. Since the fire, burned areas have temporarily reverted to open grasslands. Extremely dense growth of new pine seedlings, up to 30 cm. high, can now (after three and a half years) be seen throughout the burn. This area is now also newly subject to extreme flooding as the dead trees can no longer retain moisture (some meadows which formerly dried up in summer are now under three meters of water year 'round!).

These observations indicate to us that the forest does recover from mountain pine beetle; that an uneven aged forest best withstands and survives both the pine beetle and fire; and that large clear-cuts only mimic, but do not duplicate, these more or less "natural" events. We anticipate that large clear-cuts may bring about the flooding we now observe in the burn (and which we have observed in clear-cut areas elsewhere in Tsilhqot'in), and will again create even-aged stands that are further less resistant to pine beetle outbreaks and fire.

We therefore believe that it is important to make a distinction between a socio-economic problem and an environmental disaster. While we recognize the inevitable socio-economic dislocations caused by the current mountain pine beetle outbreak, we do not consider that it is an environmental disaster. However, extensive clear-cutting in an attempt to control the outbreak may well bring about such a disaster. Left alone, experience here and in Germany shows that the forest will die and recover.

We question that there is adequate knowledge of the long term consequences of logging in relatively high altitude, climate stressed forests on thin soils such as in the Brittany Triangle and adjacent areas. We do know that the U.S. Forest Service would not log such areas at all (see Travers, O.R., RPF, Natural Resource Management Policy Plan for the Brittany Triangle – report available at [www.fonv.ca](http://www.fonv.ca)). Is there adequate knowledge of the hydrological effects of removing forest cover from very large areas? What, indeed, are the benefits of not logging? Leaving beetle killed trees standing will leave a "control group" that enables us to see how a forest regenerates. It may reveal other, possibly positive, effects (we do know that a beetle killed forest will burn more slowly, without some of the "holocaust effect" of fires in a living lodgepole pine forest, as dead trees have lost their highly flammable needles). We have corresponded with several foresters who believe that the Brittany Triangle could constitute an ideal "living laboratory" to study just such questions.

We wish to register a concern regarding the very low stumpage rates for salvage operations such as prevail for beetle killed harvesting. These tend to make logging economically profitable where it would otherwise not be. We question whether it is appropriate to allow logging where it would otherwise not be done until much later (or not at all) with little or no direct economic benefit to the Crown. We believe this applies to the very low quality (from an economic perspective) forests of the Brittany Triangle and the Preserves area.

We conclude from the above that industrial logging as anticipated by the Sub-regional Plan under the Cariboo/Chilcotin Land Use Plan is totally inappropriate for the Brittany Triangle and indeed the rest of the ?Elegesi Qiyus Wild Horse Preserve. In addition, it will lead to the loss of what is at present a finely balanced ecosystem where black and grizzly bears, mountain lion, gray wolves, moose deer, salmon, and a range of fur-bearers exist in a fine ecological balance. The wild horse herd, that at present has scant government protection despite its significant heritage value (it has existed here since well before European arrival in the area) is an important component of this ecosystem. It provides prey bio-mass for predators and creates a network of trails used by all wildlife. In this way it allows both moose and mule deer to move more freely, even in deep snow.

We would recommend a very limited regime of fire control, leaving small fires to burn and protecting only human infrastructure. The occasional large fire will occur as happened in 2003. The accumulation of very dry woody debris as a result of the earlier pine beetle epidemic, combined with fire suppression over the years, made this inevitable. Nevertheless, the ecosystem is recovering, though changed temporarily. And that same debris provides habitat for pine marten and contributes, as it rots, to humus build-up in this very thin soil area.

In conclusion, we are opposed to industrial scale logging in this area. It is both a laboratory for scientific research in an intact and balanced eco-system, and a refugium from the industrial logging which has taken place throughout the rest of the Western Chilcotin. This means that the wide range of wildlife, especially the large carnivores, and perhaps most particularly the blue listed grizzly bear, still have one last place where they can survive unmolested in a sub-boreal lodgepole pine forest. By leaving the area undisturbed, connectivity between the small Nunsti Park and Tsylos Park will be retained. This is especially important to grizzly bears as they travel between the two areas.

We recommend a Google Earth view of the Brittany Triangle! It can clearly be seen by all as a green island surrounded by extensive clear-cuts. It has survived as such only because of its relative inaccessibility, and because of the unrelenting resistance of the Xeni Gwet'in people of Tsilhqot'in.

Should an industrial scale salvage logging regime be implemented here, the result will be ecosystem disruption and habitat loss. It will mean social disruption to the Nemiah Valley community. That means a loss of community stability and social unrest in a community that is strongly resistant to intrusions into its territory

without consent. This community has consistently rejected such intrusion in the form of the industrial logging model despite great pressure from the provincial government. Indeed, such pressures brought about the long running claim for rights and title that is now before the Supreme Court of British Columbia (the Final Argument of the plaintiff can be seen on our web-site at [www.fonv.ca](http://www.fonv.ca)).

Industrial salvage logging will result in economic loss to the Nemiah Valley community. While there will be some short term jobs created, there will be inevitable destruction of the wilderness qualities that are required for the existing and planned wilderness tourism industry in the area. Several lodges have existed for many years. These provide local employment and a sustainable economy capable of carefully planned expansion. The wild horse preserve concept has stimulated growth in this area. Such growth requires careful management and thoughtful access management strategies. To that end, FONV has worked closely with local lodge operators and XGFNG. We have worked out both access and wildlife viewing guidelines.

The Xeni Gwet'in are developing their own plans for wilderness tourism and are working on cultural tourism initiatives. Both of these will be compromised by inappropriate industrial development. Tourists do not come to an area to view clear-cuts. The road construction involved in salvage logging, despite the best intentions and efforts to rehabilitate, will inevitably create motorized access into wilderness areas like the Brittany Triangle. We have bitter experience of this following the creation of the bulldozed fireguards. Widespread vandalism created by the following year's mushroom harvest was devastating. The area is still recovering from that. If the Taseko Mines Fish Lake Mine plans go ahead, the Nemiah Valley will experience an influx of motorized recreationists and hunters far beyond anything seen before. Combined with the access resulting from logging, wilderness qualities in the area will not just be compromised – they will be destroyed.

We do not wish to be seen as opponents of any and all development, though the retention of wilderness values implicit in ecosystem protection is our number one priority. In addition to the programs enumerated above, much of the work we do assists the development of capacity in the Xeni Gwet'in community so that management of the Caretaker Area is enhanced. We have ongoing educational initiatives designed to create pride in and to protect Tsilhqot'in culture and Tsilhqot'in language development. We support the Tsilhqot'in land claim for rights and title, in part because we believe it offers the best available political avenue for protection of the land, plants and animals which it is our mandate to protect. This is evidenced through the Aboriginal Wilderness Preserve Declaration and the ?Elegesi Qiyus Wild Horse Preserve Declarations of the XGFNG. It is evidenced through a strong community stand against industrial logging in the Caretaker Area. It is evidenced by the eco-system based plan commissioned from SILVA Forestry. The latter stands in strong contrast to the unrelenting commitment of provincial planners and the Ministry of Forests to a planning process that appears blind to the values and new insights of conservation biology. This appears to be a planning process prepared to over-ride the wishes of the local community and also

appears unaware of the fact that the land over which they are planning is subject to a land claim and thus over which they may not even have jurisdiction.

In summary:

1. FONV recommends that the area delineated by the Aboriginal Wilderness Reserve and the ?Elegesi Qiyus Wild Horse Preserve be left intact and not subject to industrial salvage logging and that the Brittany Triangle remain in its present un-roaded state.
2. That fire control measures in the Brittany Triangle be limited to protection of human infrastructure.
3. That the provincial government recognize the heritage and biological values of the wild horse herd in the Preserve and provide legal protection by recognizing the horses as wildlife.
4. That the province, in the spirit of the New Relationship, recognize the aboriginal rights and title of the Tsihqot'in and Xeni Gwet'in in the ?Elegesi Qiyus Wild Horse Preserve, including the right to manage the area according to Tsihqot'in law and values.

FONV has worked hard to gather the best scientific information available. It has conducted its own research on the wildlife and habitat of the Preserve area. While we have concentrated our efforts in the Brittany Triangle, we have not restricted them to it. We have observed the land and biota in a disciplined fashion for six and a half years. We consult closely with those who make their living from the land; trappers, ranchers, hunters, guides and First Nations to whom it provides many of the essentials for survival. We feel confident that we and our consultants know it as well as anyone outside the First Nations community whose home and hunting territory (Tache lach'ed) it has been since time before memory.

We ask that our concerns and the questions we raise, along with our recommendations, be given careful consideration.