



October 15, 2026

BC Timber Sales
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Re: BC Timber Sales (BCTS) 2026 Rose Swanson Public Referral for FSP #771

The Armstrong Spallumcheen Trails Society (ASTS) has spent this past summer reviewing the information supplied by BC Timber Sales (BCTS), including the WaterSmith Hydrologic risk Assessment (WS). The BCTS and WS information was passed along to the experts we retained, Dr. Younes Alila – Forest Hydrologist (UBC), Michele Hill RPBio, Hill Environmental and Carla Conkin, LL.B. Their comments, and ours, are attached and inform part of our submission.

We received written responses from both BCTS and WS that pertain to our comments and those of our experts. These have been reviewed by our multidisciplinary group and they are all raising red flags. Their responses are also attached to this submission. We have done a lot of work to bring together the science missing on Mt. Rose Swanson (Mt. RS).

So, what do we think now? We have tried to bring forward this necessary science that is required to make meaningful, informed decisions on how to move forward on Mt. RS. We are extremely disappointed at the lack of meaningful responses we received from BCTS and WS. What stands out to us? BCTS and WS have checked a box but the comments are empty. The concerns that Dr. Alila, Michele Hill and Carla Conkin have raised are very important and must be seriously considered.

In addition to the experts mentioned above, the ASTS also recently retained Edyta Marcisz MSc, Cumulative Effects Program Manager, Adams Lake Indian Band (ALIB), to use their draft Holistic Cumulative Effects (CFx) Framework to conduct a study of the cumulative multiple stressors

affecting the Mt. RS forest and the significance of Mt. RS's mature forest cover as distinct and significant recruitment forest (a young class of old growth forest). We've received great benefits working with Edyta and the ALIB. Her forest assessment report is currently in an early draft form and hence is not submitted today. She has also consented to giving a presentation on her findings in the near future.

Preliminary information from the ALIB indicates that the proposed 41-ha harvest footprint is located entirely within recruitment forest and modelled High or Moderate habitat connectivity areas, where existing old growth is scarce. The combined findings support avoiding the proposed harvesting and prioritizing retention of mature-forest continuity, habitat connectivity, and forest stands capable of developing into future old growth. Keeping and creating old growth forests are important for economic, ecological, First Nation heritage, and the mental and physical health of our country.

The ASTS and many local residents are very frustrated, concerned and worried about what could potentially happen on Mt. RS in the near future. The ASTS is the bridge for the public on this matter as we are the only organized group on the mountain and are there on a regular basis for volunteer work on the trails and for enjoyment of the natural environment. We are constantly engaging with the public on the mountain and at public events. The majority of the public are saying "leave our mountain alone"!

There is a lot of history associated with our mountain and we want to remind everyone that:

- For more than a century Mt. RS has given families of Armstrong and Spallumcheen a wilderness for recreation and connection with nature.
- In the 1930's the civic and business leaders in the Armstrong Board of Trade asked the Minister of Lands to protect Mounts Rose and Swanson for the community. The Minister started the conservation process by removing the Mountain from the area that could be granted to homesteading settlers or companies.
- In 1952, Spallumcheen pushed to have the peaks officially named Mount Rose and Mount Swanson, and the mountain as a whole was referred to as Rose Swanson Park. The peaks were registered in the BC legislature and the Province started taking steps to establish the mountain as a park for the use, recreation and enjoyment of the public.
- By the 1980s, Spallumcheen and Armstrong finally had the mountain established as a Reserve for Rose Swanson Park - official designation under the *Land Act* for the "Use, Recreation and Enjoyment of the Public" (UREP). It covers approximately 1,500 hectares. Any other uses of the land, including a Timber License, must respect the UREP.
- In the mid 1990s, Tolko held the timber license and planned some logging. Public outcry and protest led to the designation of the Rose Swanson Sensitive Area. The Rose Swanson Sensitive Area is 712 hectares covering most of the Crown land on Mt. RS.

- The Township of Spallumcheen has long supported the community's recreational use of Mt. RS. The Official Community Plan (OCP), adopted in 2011, refers to the importance of the mountain for its panoramic vistas and the beauty of the viewpoints. The OCP states that the Township "will pursue the establishment of an interpretive forestry trail at Mount Rose Swanson and will explore options to obtain “park” status for the area ... to maintain Mount Rose Swanson for future public use and to preserve its natural qualities."
- In 2013, BCTS took over the timber license from Tolko.
- In 2020 and 2021 the BCTS proposed logging plans came to a head. Again, the public spoke up, most notably by a petition in which over 24,000 people signed. Logging plans were stopped.

What's happened since? The ASTS has been actively following this matter. In the past couple of years BCTS released another Harvest Plan saying that they have taken all previous public comments into consideration, but they haven't. It appears that in the last 30 years the public's legal rights to recreation were forgotten, ignored or misplaced.

We've given you the history so where are we now? We are thankful to our experts as they tell us what should be considered and done. We need a holistic approach, taking into account all of the information; western science and First Nations knowledge to formulate a proper Management Plan for Mt. RS.

A concerned community member started another petition on September 29, 2026, titled "Save Rose Swanson" <https://c.org/gPgp74HQkw> and as of October 15, just 17 days, approximately 1,900 people, including First Nations people and Professional Foresters, have said "no to logging". Enough is enough! In part it says *"Rose Swanson Mountain is more than a collection of trees. It is a living watershed, a wildlife habitat, a trail network, and an important part of the community surrounding Armstrong and Spallumcheen. For generations, people have used this mountain for hiking, horseback riding, mountain biking, dog walking, snowshoeing, cross-country skiing and simply finding a quiet place in nature. The mountain contains approximately 30 kilometres of trails, and trail counters have recorded nearly 100,000 users over the past five years. It is one of the few accessible areas of Crown land available to local residents and visitors for recreation and outdoor activities."*

We cannot bring back a mature, natural forest once it has been removed and replaced by a plantation. We cannot recreate decades of wildlife habitat and the natural ecosystem above and below the ground surface overnight. We cannot easily restore a watershed if we discover years later that we got it wrong.

But we can speak up before that happens.

Let's make sure the people making decisions about Rose Swanson Mountain hear the voices of the people who live here, love this place and depend on it".

In conclusion, the ASTS hired independent experts to supply us with the science that has been missing, something that the Province should have done. We are thankful to these experts as they tell us what should be considered and done. This multidisciplinary group has all raised red flags so you, BCTS, need to go back to the drawing board. Any logging will have irreversible impacts on Mt RS as its effects haven't been thoroughly assessed. A fulsome Management Plan is required.

Respectfully

A handwritten signature in cursive script, appearing to read "M. Sidney".

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List of additional attachments:

1. Carla Conkin Legal Submission in Support of ASTS and Expert Submissions: Public Comment Period for Proposed BCTS Logging and Road Construction 2026/27 TA0495: Mt. Rose Swanson, N. Okanagan, BC., Oct 15, 2026.
2. Dr. Younes Alila Final-Comments-WaterSmith2025, Oct 15, 2026
3. Michele Hill, Hill Environmental, Hill Environmental FINAL_Comments_15OCT2026