



August 7, 2026

RE: Spallumcheen Town Hall Meeting – Select Committee – Discussion with BCTS and Hydrologist, Russell Smith regarding the Hydrologic Risk Assessment of Mt. Rose Swanson: Concerns and Questions

ASTS is providing this letter to present our main points and questions about the proposed BCTS logging of Mt. Rose Swanson (Mt RS) and the WaterSmith Hydrologic Risk Assessment, dated December 23, 2025, funded by BCTS (the WaterSmith Assessment). We appreciate being part of this Town Hall meeting where we can address questions and concerns not only on behalf of ASTS but also as an organization representing public interests and local values associated with Mt RS, both now and in the future.

This letter also lists the main points put forward by me, Marge Sidney, President, on behalf of ASTS, at the last meeting of the Select Committee, held July 14, 2026 and can be used to complete the minutes of the July 14, 2026 meeting.

During the above noted Select Committee meeting, there was discussion about ASTS, the points raised and the experts that are informing ASTS. ASTS confirms that it has retained the following experts:

- Dr. Younes Alila, PhD (Civil Engineering, Hydrology), Professor in the Faculty of Forestry, Forest Resources Management, University of BC, Vancouver, BC.
- Michele Hill, F.W., F.W.T., BSc, RPBio, Hill Environmental, Armstrong, BC
- Carla Conkin, LL.B., retained as legal counsel, in addition to being a Canada-wide regulatory expert in natural resource project reviews, impact assessment and lifecycle permitting. She is a part-time Commissioner, appointed by the Minister of the Environment and Climate Change, as Roster Review Panel Member with the Impact Assessment Agency of Canada, cross appointed to the Canada Energy Regulator and Canadian Nuclear Safety Commission for integrated impact assessments.

Letters from Dr. Alila and Michele Hill will provide commentary and questions to be considered by Mr. Russell Smith and BCTS. Carla Conkin has contributed to this letter and informed ASTS's main points, specifically regarding the importance of impact assessment and informed decision making for both BCTS and the Township of Spallumcheen.

This letter provides questions and points for BCTS and Mr. Smith to respond to in writing to inform the ongoing public engagement process ending September 24, 2026. ASTS also anticipates coordination with the Township of Spallumcheen.

Main Points for WaterSmith Hydrologic Risk Assessment

After considering the BCTS commissioned WaterSmith Risk Assessment for Mt RS, speaking with the noted ASTS experts and considering our own knowledge of Mt RS and its importance, ASTS provides the following main points regarding the WaterSmith Assessment:

1. Partial Risk Assessment and Proposed Logging not Assessed

The WaterSmith partial Risk Assessment has a very narrow scope, excluding societal and downstream values, both economic and environmental. It does not assess impacts from the proposed logging as it was prepared without the knowledge of the specific forest planning and cut block details. ASTS questions the validity and sufficiency of this assessment.

2. Risks Identified and Passed Over to BCTS to Address Later

Risks to water resources, public roads, residential and agricultural development, and public safety are acknowledged but left for later handling by BCTS (without public knowledge?), leaving the WaterSmith Assessment incomplete and not clear to the public.

There are risks to water intakes, natural watercourses, public roads, residential and agricultural development, and public safety that require careful consideration when determining the amount and distribution of harvest to complete. (pg. 31 Recommendations)

In the current drought condition, the knowledge of risk to water resources for residents and the agricultural community is critical, but has not been evaluated. There is also concern that clear cutting increases the risk of wildfire due to drying of the ground in and adjacent to the cutblocks, but this has not been assessed

3. The Use of ECA for a Risk Assessment is Out-dated and in Question

The results of the WaterSmith Assessment were largely dependent on the calculations of Equivalent Clearcut Area (ECA). Assessments based on out-dated methodology (ECA calculations) have questionable scientific validity, a high potential of misleading results and the undermining of any trust in their conclusions.

4. Update Reviews on 5-year intervals for Additional Harvesting of Mt RS?

The recommendation for periodic reviews every five years (by BCTS) suggests BCTS has ideas of additional harvesting beyond the current 41 hectares. Periodic reviews push the situation forward, reducing options later - there is a risk of irreversible landscape damage before fuller assessments occur.

5. Impact Assessment of Downstream and Integral Valued Components is Needed

A comprehensive impact assessment addressing downstream (public safety, wild fire, water quality and quantity, security, etc.) and integral valued components (biodiversity, soil stability, societal connections, etc.) are necessary to determine whether logging should proceed and to justify mitigation measures. The current partial assessment does not provide this information. When there are foreseeable risks that remain unassessed, uninformed approvals and support to proceed without a full assessment is an important consideration for those with decision-making authority and responsibility for protecting the community.

6. Economic and Environmental Cost-Benefits are Missing

BCTS, the Province and local governments all bear responsibility to supply environmental and economic cost-benefit information to the public to support informed decision-making with regards to Mt. RS.

Questions for BCTS and Mr. Russell Smith (Hydrologist)

In providing these questions, it is important to point out that ASTS, and the public are not in a position to be able to ask scientific questions, or get into dialogue with Mr. Smith about the technical nature of the risk assessment.

The assessment and the BCTS information needs to be digestible and clear to the public, especially with respect to risks and impacts.

Given the concerns noted above, the significance of Mt RS, the lack of clarity and transparent engagement, ASTS has been compelled to hire the expertise that should have been accounted for directly by the public authorities who are responsible to inform their decision-making. As such, technical questions will come from the independent experts retained by ASTS. Note that ASTS has paid for these experts out of pocket from members, from public fundraising and support for protection of Mt RS for the community and for the future.

1. Why was the hydrologic assessment limited to partial risks when other BCTS assessments have been broader in scope? What justifies this restricted scope of risk assessment for Mt RS?
2. ASTS understands that BCTS previously commissioned a report, "Current Condition and 10 -Year Historic Trend of Hydrologic Hazards in the Okanagan Timber Supply Area" (2017). The report indicates that due to increasing and potentially severe socio-economic consequences to downstream values, downstream values should definitely be assessed. Considering the previous report to BCTS why are these downstream values excluded from the WaterSmith Risk Assessment?
3. Does BCTS intend to risk assess the remaining unaccounted-for risks identified by Mr. Smith, and will the public be engaged in this process?
4. Will BCTS continue to rely on the potentially flawed concept of ECA calculations amid public and professional peer concern?
5. What is the basis and implications of BCTS's "moderate risk tolerance" mentioned by Mr. Smith, including what impacts and damages are deemed acceptable?
6. What specific risks were excluded from the scope of instructions to Mr. Smith? What remains to be done and which qualified professionals should be involved (e.g. terrain stability risk assessment experts, etc.)
7. Does BCTS see planning and adjusting for climate change factors and downstream values as beyond its responsibility, expecting other authorities to address them?
8. Is BCTS willing to support acquiring missing impact assessment information and an independent impact assessment? What is the Township's role and stance given its responsibility to represent community interests?

Respectfully

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

Marge Sidney

President

Armstrong Spallumcheen Trails Society

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