

Background:

We encourage people to inform themselves in a balanced way about all the issues at Summit Lake. As with any land base issue there is a wide range of opinion and perception. We maintain current visual background information about toads and our operations on our website at

www.nakuspcommunityforest.com.

With respect to information; our goal has been and continues to be to research, literature review and **share** via the NACFOR website.

NACFOR will continue to contribute to the western toad "knowledge base" as much as possible. We compile local research for use in management. Some broader-based research / literature review will be on-going in 2019.

The science is variable with respect to impacts of logging on toads. But science has failed to prove negative impacts and has in fact often shown positive impacts of logging. Toads are cold blooded so logically a diversity of landscape that includes closed canopy forest, openings, a diversity of vegetation and protection of riparian areas and should favour toads. They often use riparian corridors for movement up and down slope, so they should be protected during operations whenever possible.

NACFOR's operating area lies within the terrestrial (upland) habitat of the Summit Lake toads. The total area of toad habitat is undefined, but NACFOR recognizes that toad presence occurs throughout most or all of the Summit Lake working forest, albeit in variable numbers depending on the particular habitat.

NACFOR recognizes the significance of the Summit Lake population. The fact that a highway bisects the land between breeding habitat on the lake side, and terrestrial habitat on the upslope side, and that toads and toadlets migrate between these two habitats "en masse" in a very visible manner at Summit Lake makes them easy to observe – it is a very compelling sight when they are on the move.

NACFOR gladly accepts the responsibility of managing the community forest portion of the upland terrestrial habitat. It is an economically, environmentally and socially valuable part of our working forest. NACFOR will also advocate good practices on adjoining lands at Summit Lake and other toad habitat areas.

As a result of a complaint from an Environmental Non-Governmental Organization (ENGO), the Forest Practices Board (aka FPB, who is the government watchdog for forest licensees in BC) conducted a two year investigation into NACFOR's practices at Summit Lake. The results were favourable for NACFOR, as follows:

To answer the question - *Did NACFOR take reasonable steps to protect westerns toads in their Summit Lake operating area?*

The (Forest Practices) Board concluded that - although there are no legal requirements under FRPA to protect western toads, NACFOR has taken reasonable steps to protect the toads. The steps include



seeking advice from specialists, contributing to western toad research, identifying and retaining western toad habitat attributes and implementing available guidance on measures to protect the toads.

On December 31, 2016, Western Toads' classification changed from "blue listed" (special concern) to "yellow listed" (not at risk) by the BC Conservation Data Centre (CDC).

People need to consider **all** of the factors and impacts at Summit Lake including private land impacts, breeding habitat impacts, highway/travelling public impacts, recreational use and terrestrial (upland) habitat impacts. Positive as well as negative impacts should be considered.

Western Toads are widespread throughout their natural range in North America. This is not the only local population as most people who utilize the outdoors will attest. There are a number of other very robust but lesser known toad population sites around our area, including Box Lake, Beaver Lake, Wilson Lake, Hill Creek, and others.

A main threat to toads that we have found in the literature is loss of aquatic and terrestrial habitat due to residential development – well documented in the lower mainland. This includes alteration or loss of their breeding habitat, for example draining or disturbing breeding areas, often on private land where typical land management practices used on crown lands do not apply.

Park proposal / Land Swap:

Special interest groups are currently lobbying government to create a park overlying NACFOR's Summit Lake operating area.

A park would not "solve" any of the perceived issues. It may in fact make the issues more difficult to study and very likely much more difficult for needed research to be funded.

NACFOR is used to managing a multi issue / multi constraint land base. This is the typical complex nature of our land base. At Summit Lake we are continuing a long history of timber management within the working forest above Summit Lake, and doing this in a careful manner. We are quite happy to do so.

NACFOR is not interested in a "land swap" as is being suggested by some individuals and special interest groups lobbying the owner of NACFOR – the Village of Nakusp.

A land swap might seem like an easy solution to a land base conflict, but the realities are that every piece of forest land has other resource values and constraints that have to be managed. For example:

Grizzly bear habitat
Geotechnical and terrain stability issues
Domestic and Community watersheds
Maintaining Visual Quality
Recreation and Access
Archeological and cultural heritage considerations
Private land interface



These are all issues that NACFOR manages throughout Summit Lake and most other areas of the Community Forest. At Summit Lake we are recommending cautious and informed status quo management. We have been good managers as government at all levels will attest.

Operations:

The Summit Lake area was extensively logged prior to 1925. There was a catastrophic wildfire in 1925. The lake has been treated twice to get rid of coarse fish in preparation for stocking with game fish. The point being - that there is a long history of disturbance there. See the visual overview map referenced above.

Our operations are closely monitored and documented with an Environmental and Safety Management System (ESMS). All operations are subject to regular inspections and documentation during operations as well as an in depth "pre-work" before operations take place.

Our operations are planned to take a light footprint over a relatively small area. We plan for careful operations and couple research with our operations. The Summit Lake operations have been used to create best management practices for forestry operations in western toad habitat, which are being used to guide operations in other areas with toads.

If we do nothing, we will learn nothing. But if we couple careful and safeguarded operations with research, we will contribute to the knowledge base about toads.

Our operations are designed to limit ground disturbance, to protect and enhance habitat features which may be of use to toads and other creatures and provide a diversity of habitat across the landscape including reforested areas.

We use the winter /spring snowpack to limit ground disturbance by equipment. If the snow pack is insufficient, we delay or suspend operations. Toads hibernate underneath the ground in natural openings in the forest floor.

All cut blocks have retained trees including wildlife tree patches, dispersed retention, and also unique toad habitat features which were identified by experts. We are willing to try other styles of harvesting operations. We encourage people to come and have a look at our operations.

Conflict:

While peaceful protest and debate is a human right, blocking access roads to personnel or equipment is an illegal activity which we don't believe does anything to help toads. We did have roadblocks in the past and we exercised respect and patience with the protesters, and engaged in daily dialogue.

Questions:

Some questions for discussion and consideration:

What can NACFOR do differently in operations within the terrestrial habitat?



- How are activities managed closest to the breeding habitats which can include clearing private land, recreation infrastructure and activities, building structures, altering foreshore and riparian areas, and constructing and paving roads?
- What overall proportion of the private land and park land at Summit Lake has been cleared for roads, dwellings, lawns, campgrounds, hydro lines and open space? Clearing involves removing stumps and organic debris off of a site and often replacing with non-native vegetation, gravel, or pavement.
- What typical proportion of individual private lots has been cleared for houses, out buildings, driveways and open space? For example out of a two acre lot what proportion is typically cleared and occupied by structures or other developments? What are the individual and cumulative impacts?
- Are there restrictions in the area around use of chemicals including pesticides and herbicides for domestic or commercial use?
- What is the travelling public and highway impact to toads and how can it be better mitigated?
 Are highway closures at peak migration times an option? What about rail bed closures for recreationists?
- On forestry roads, are temporary road closures and limitations on industrial and recreational use an option?
- What are the impacts of campgrounds in the area should there be government campground closures during peak migration times to limit harm to toads?
- What is the status of crown lands outside of NACFOR's operating areas which were reserved for park status (Goal 2)?
- Should western toad best management practices be developed for private land, campgrounds and highways right of ways?
- Is there an effective outreach program for local residents regarding toad management?
- How much funding is being spent on toad research, and where do the priorities for research lie?

These are fair questions to ask. We think that this dialogue about toads needs to continue. NACFOR is happy to be part of the local scene and debate. But the dialogue should be broadened to include all of the factors and players that can affect toads at Summit Lake and other locations. Meanwhile we would like to continue our successful mandate of providing economic, environmental and social value to the area by operating within our Community Forest Area.