



June 24, 2010

Mr. Justice Cohen
Cohen Commission
Suite 2800, PO Box 11530
650 West Georgia Street
Vancouver, BC V6B 4N7

Dear Commissioner Cohen,

I am making this submission on behalf of Western Log Sort and Salvage, a co-operative of marine log salvors also known as beachcombers. Our organization is one of two licencees authorized by the Ministry of Forests to market recovered logs lost during water transport or handling.

An enormous volume of logs are moved by water on the BC Coast and are frequently stored in booms along the Lower Fraser River. Log owners prefer the fresh water of the Fraser to protect wood from degradation by teredos, also known as ship worms. The Fraser is also close to milling and chipping facilities, as well as piers used to load logs for export. Port Metro Vancouver reports that log exports grew 4,800% between 2006 and 2008 to 8,308,125 tonnes.

While log handling procedures have improved greatly over the years, a certain volume of logs are inevitably lost. Marine log salvors make their living recovering such logs and perform an invaluable service towards the protection of the environment and marine navigation.

Under provincial regulation, salvors may only sell recovered logs through a "receiving station licence". Until WLSSC was recently awarded a second licence, all salvors in the south coast and Fraser River had to market logs through a single licence that was granted in 1954.

This monopoly situation meant that salvors were often paid only a fraction of the market rate for recovered logs and a large volume of logs have been left to drift because salvors would lose money picking them up.

As you know, the Fraser Estuary is the largest on the west coast of North America and provides a critical staging area for juvenile salmon as they adjust to salt water and move into the ocean. Unrecovered industrial wood debris has been identified in a study conducted by FREMP as a leading cause of degradation to red-coded marsh habitat in the Fraser River Estuary.

Unlike natural woody debris that has been shown to add complexity to fish habitat, logs with cut ends are not anchored by rootballs or branches and tend to move with boat wakes and tides, crushing and smothering wetland plants.

Attached is a photo of a typical Fraser River marsh as an example.

The poor economics of marine log salvage have also resulted in a large amount of sunken wood accumulating on the bottom of the Fraser, which may also be impacting returning salmon.

In July of 2009, WLSSC was contacted by the GVRD that was dredging a right-of-way for a pipeline across the North Arm of the Fraser downstream of the Arthur Laing Bridge. They required a marine log salvor on board the barge to stamp sunken logs as they were lifted by crane from the bottom of the Fraser.

One of our members was hired for this work and he reported that in this 20 metre transect of the Fraser, 788 logs (all with cut ends) were recovered, which he estimated totaled 500 cubic metres in volume.



The Fraser is approximately 200 metres wide at this location - narrower than many reaches on the Lower Fraser but perhaps a representative sample of the North Arm.

The North Arm is approximately 30 km long from UBC to New Westminster, indicating that there may be in excess of 750,000 cubic metres of unrecovered logs on the bottom of this relatively small portion of the Lower Fraser. To put this in perspective, this is the equivalent of more than 18,000 fully loaded logging trucks.

It can be assumed that this scale of sunken logs is a relatively recent occurrence. While deadfall trees have been swept down the Fraser for millennia, these would typically be high floating species of interior wood. The vast majority of sunken logs recovered last year during dredging were hemlock, a coastal species prone to sinking that has only recently been moved upstream in large numbers in log booms. Fresh water also provides less floatation, and entire bundles of low-floating hemlock can sink when brought into the Fraser from the ocean.

The Fraser is a tidal river with a “salt wedge” on the river bottom that penetrates up to 22 km upstream during low flows and high tides. It is well known that sunken logs can have a detrimental effect on fish habitat due to the biological oxygen demand of decomposing wood. Researchers have documented that estuarine salt wedges can become anoxic due to decomposition of organic matter.

Salmon returning into the Fraser often move on a flood tide and would be inclined swim in salt water at the bottom of the river since it is colder and has a salinity they are accustomed to.

Fish swimming into a zone of depleted oxygen are often rendered incapacitated before they can escape and if fatally impacted, would be swept out into the Strait where they might “disappear”. Others weakened by low oxygen levels in the Lower Fraser might be unable to complete the long journey to spawning grounds.

I raise these issues because the impacts of unrecovered logs and industrial wood debris are often overlooked by the public. Until recently, the Fraser had a regular influx of natural deadfall that would migrate downstream and become anchored in the estuary. However, the Agassiz debris trap now captures and removes much of this ecologically beneficial material. At the same time, industrial logs with cut ends have accumulated in the Fraser Estuary and on the bottom of the channel in such numbers that they may be severely impacting Fraser River sockeye.

WLSSC aims to improve the economics of marine log salvage by offering salvors higher prices. The resulting increased rate of log recovery would directly benefit the marine environment and navigational safety.

Our efforts to date have largely been hampered by the anti-competitive practices of a small but influential number of log buyers who have enjoyed a monopoly in the purchase of marine salvaged material since 1954. None of the chipping facilities on the Lower Fraser has consented to purchase our logs, and some of our established log brokers have been threatened with boycotts if they buy logs through our licence.

It is understandable that a new market entrant such as ourselves might meet resistance as we are seeking to end such a long-standing monopoly, and we welcome this challenge. However it is unfortunate that Fraser River salmon - an icon of our province - are seemingly being impacted by the externalized costs of a small portion of the logging industry.

I am available to provide more details on these issues if they are of interest, and wish you and the rest of the Commission success in your important work.

Best regards,

A handwritten signature in black ink, appearing to read 'Mitchell Anderson', with a long horizontal line extending to the right.

Mitchell Anderson
General Manager