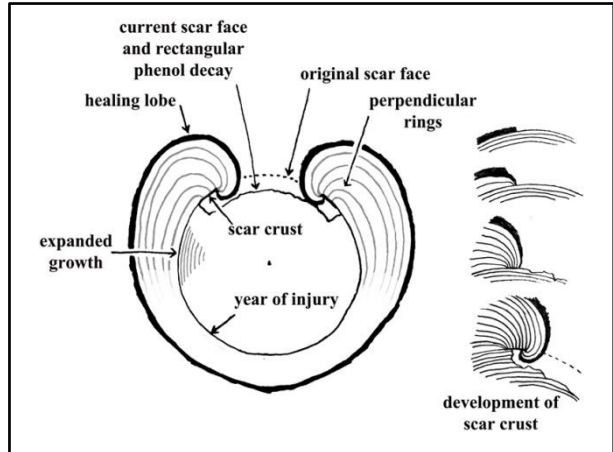


January 30<sup>th</sup>, 2020**Submission to BC Old Growth Strategic Review Panel:****Concern Regarding Current Under-Recording of CMTs**

I have helped contribute a submission with the Archaeological Society of British Columbia and British Columbia Association of Professional Archaeologists for this panel review last week. However, I would like to make a small submission specifically related to my own Master's research out of the University of Victoria (2016). My thesis was related to Culturally Modified Trees (CMTs) and forest management by Nuu-chah-nulth groups on Vancouver Island's west coast.



**Figure 1: diagram of a bark strip CMT in cross section, as seen in cutblocks.**

My research initially intended to gather additional data from CMT sites that had been previously identified during Archaeological Impact Assessments (AIAs). A typical AIA survey is sometimes followed by a Site Alteration Permit (SAP), which often allows for the harvesting CMTs. Only a small portion of CMTs are usually dated (depending on total numbers and significance of CMTs). By going out into cut-blocks near registered CMT sites I was able to efficiently date all the features in cross section (Figure 1) that hadn't been chosen for dating by archaeologists prior to falling.

I quickly found during my cut-block surveys that all the archaeological sites that I visited had bark stripped CMTs (now stumps) within them or nearby that had been overlooked during initial AIAs, and many cut-blocks not associated with known CMT sites (45% of those visited) had bark strip CMTs that had been completely overlooked and cut down. My findings suggested,

- At least half of bark strip CMT features are overlooked in the AIA process in standing forests.
- Half of all bark strip CMT features are embedded scars (in which tree has healed completely over the bark peel) or highly rotten/obscured (older and often unidentifiable in a standing forest)
- For features that are actually identified in AIAs there is consistent under sampling (dating) of features that are removed following SAPs
- The percentage of CMT features that have evidence of multiple harvesting episodes is greater than previously thought (due to these hidden, embedded scars)
- The record of CMT harvesting reaches back over the last millennia (oldest cultural scar 1108 years), and is concentrated to the time just prior to the contact period when Indigenous populations were at their highest.

These findings have implications related to Indigenous land title cases where there are remaining old growth stands, and future protections for old growth in the province. I strongly agree with all the recommendations set forth in the ASBC and BCAPA letter. I've attached the publication related to this thesis work, published in American Antiquity..

Best, Jacob Earnshaw, M.A.