



Village of Tahsis

November 25, 2019

VILLAGE OF TAHISIS SUBMISSION TO THE OLD GROWTH FOREST STRATEGIC REVIEW PANEL

Thank you for the opportunity to make this written submission as a supplement to our oral submission made on November 8, 2019 in Campbell River.

The Village of Tahsis is opposed to logging in the McKelvie Creek Community Watershed ("the watershed"). Attached to this submission is a June 27, 2018 letter to Minister Donaldson expressing Council's June 19, 2018 resolution calling for the complete preservation of the watershed and asking that it be removed from TFL 19.

On December 4, 2018, the newly elected Council passed the same resolution. In addition, Council has also expressed its opposition to timber harvesting on the north east ridge above the community which contains old growth Douglas Fir.

In 2018 the Village retained EcoLogic Consultants Ltd. to conduct a watershed assessment. The purpose of the assessment was to:

- spatially identify values within the watershed, including ecological, economic and cultural, using a risk assessment protocol;
- ◆ identify data gaps in existing assessments of watershed values;
- ◆ propose programs to address any data gaps identified;
- ◆ carry out a risk assessment once sufficient data is available; and
- ◆ present the results of the assessment in a Watershed Assessment Report, including maps that identify the scope of risk present in the watershed.

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As the watershed is a source of drinking water and other values, the Village sees the importance of developing and implementing a Watershed Protection Plan, similar to watershed protection plans established by other local governments. The watershed assessment is a key component of the Watershed Protection Plan as it identifies the risks of timber harvesting, along with other human based activity. The Terrain and Wildlife Habitat maps from the watershed assessment have been shared with the panel to underscore the types, likelihood and severity of risks related to logging the watershed. These include, but are not limited to, landslides, safety threats, contamination of drinking water, increases in flood pulses that could damage infrastructure, e.g., bridges, and further damage to anadromous fish streams, which are in dire need of rehabilitation.

Western Forest Products Inc. (“WFP”) is the tenure holder in Tree Farm Licence 19 (“TFL 19”) which encompasses Crown forested lands within the municipal boundary and in the area surrounding Tahsis. WFP planning maps show 38 cutblocks within the Tahsis vicinity to be harvested within 15 years. This would remove much of the remaining old growth within the Tahsis area.

Opposition to logging old growth in the Tahsis area under the current forestry practices model is grounded in the following:

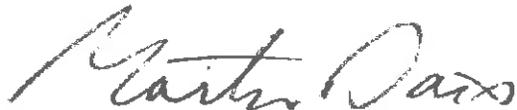
- Forestry practices in TFL 19 continue to harm fish bearing streams, shrink biodiversity, cause erosion and landslides, leave valuable timber behind and disrupt and destroy important wildlife habitat, including that of endangered and protected species like the marbled murrelet;
- Forestry contributes only marginally to the local Tahsis economy. WFP has not encouraged or required its contractors to establish a business and social presence in Tahsis, despite previously committing to do so;
- Old growth forest is an extremely valuable natural amenity essential for eco-tourism development and promoting Tahsis as a desirable location for entrepreneurs, retirees, recreational property owners and those seeking to move from urban centres. Old growth forests are worth more to Tahsis standing than logged;
- Old growth forest serves as a buffer against wildfires to protect the community and Village infrastructure;
- WFP has not established social licence or garnered community support for its plans to log old growth forests in the Tahsis area. There is a groundswell of community opposition to logging in the watershed as evidenced by the creation of the local advocacy group, McKelvie Matters; and
- Old growth forests resist climate change by capturing and holding more carbon than younger forests.

Tahsis Council is not opposed to timber harvesting which is conducted with the benefit of good data, modern planning, protection of wildlife and sustainable forestry practices. As a start, the annual allowable cut in TFL 19 should be reduced to begin to re-balance the forest ecosystem and protect old growth. Our long term goal is to establish a partnership with the Mowachaht/Muchalaht First Nation for the purpose of obtaining a community forest agreement with the provincial government. A community forest could be a model of sustainable forestry while generating income for the partners.

The Village is participating in the Chief Forester's Timber Supply Review of TFL 19 which will set the AAC for the next 10 years. Our submission in response to WFP's information package is also attached to this submission.

On behalf of Tahsis Council, I wish to thank the panel for its consideration of this submission. We look forward to future communication from the panel including the final report and recommendations.

Respectfully,

A handwritten signature in cursive script that reads "Martin Davis".

Mayor Martin Davis on behalf of Tahsis Council



Village of Tahsis

June 27, 2018

Our File No

Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and
Rural Development
Parliament Buildings
PO Box 9049 STN PROV GOVT
Victoria, BC
V8W 9E2

Dear Minister Donaldson,

I am writing on behalf of Tahsis Council to share with you a resolution passed at Council's June 19th regular meeting. The resolution expresses Council's unanimous view about the importance of protecting our community watershed which is slated to be logged by Western Forest Products, Inc.

The resolution is as follows:

WHEREAS less than 10% of productive old growth forests remain on Vancouver Island; and
WHEREAS intact and contiguous old growth forests are necessary to sustain the diversity of species for the preservation of these ecosystems; and
WHEREAS there is overwhelming evidence that accessible old growth forests are a significant natural asset for the eco-tourism economy; and
WHEREAS the McKelvie Creek watershed is one of the few remaining valley bottom virgin forest watersheds on Vancouver Island; and
WHEREAS the McKelvie Creek watershed is the community watershed for the Village of Tahsis since McKelvie Creek is the source of drinking water; and
WHEREAS neither Western Forest Products, Inc. nor the Ministry of Forests, Lands, Natural Resource Operations and Rural Development have expressed a willingness to preserve this entire watershed; and
WHEREAS Tahsis Council and the Mowachaht/Muchalaht Council of Chiefs have engaged in dialogue on the value of this watershed;
THEREFORE, BE IT RESOLVED:
THAT Tahsis Council support the complete preservation of the McKelvie Creek watershed by opposing all forms of resource extraction and development including all logging activity; and
THAT Tahsis Council call on the Minister of Forests, Lands, Natural Resource Operations and Rural Development to remove the McKelvie Creek watershed from TFL 19.

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This community understands and accepts forestry activity generally and logging in particular are important contributors to the provincial and regional economy. However, we firmly believe that logging the old growth in this watershed is environmentally short-sighted, threatens our drinking water supply and directly undermines our community's economic recovery.

We urge you to come to Tahsis to meet with local residents and the Mowachaht/Muchalaht First Nation to hear from those who will be most affected by logging in this watershed.

Respectfully,

A handwritten signature in black ink, appearing to read 'Randy Taylor', is written over a faint, light-colored background.

Acting Mayor Randy Taylor on behalf of Tahsis Council

cc: Don Demens, CEO, Western Forest Products, Inc.
Diane Nicholls, Chief Forester, Ministry of Forests, Lands, Natural Resource Operations and Rural Development
Mowachaht/Muchalaht Council of Chiefs



Village of Tahsis

July 31, 2019

Mike Davis, RPF
Tenures Forester
Western Forest Products, Inc.
#118-1334 Island Highway,
Campbell River, British Columbia
V9W 8C9, Canada

by email: mdavis@westernforest.com

Re: Tree Farm Licence (TFL) 19 Draft Information Package – Village of Tahsis Submission

On behalf of Council I am writing to thank you for your July 4th presentation of Western Forest Products, Inc.'s draft Information Package prepared for the Chief Forester's timber supply review ("TSR") of TFL 19. During the two and one half hour meeting Council posed multiple questions about the assumptions, methodology, data sources, scope, and science as set out in the information package. We consider our questions and views expressed at the meeting to form part of the record of our feedback on the information package. What follows below is additional information we are submitting in response to the draft Information Package.

McKelvie Creek Community Watershed

Foremost among Council's priorities for the TSR is the protection and preservation of the McKelvie Creek Community watershed. Council is also concerned about the impacts of logging along the ridge due east of the community. Council's advocacy is well documented in resolutions and letters to provincial and federal officials, including Minister Donaldson. The Village has retained the environmental consulting firm EcoLogic Consultants Ltd. to conduct a watershed assessment as an initial step in completing a watershed protection plan. Once received, EcoLogic's report will be shared with the Chief Forester with the aim of providing a comprehensive data set describing this particular watershed. It is noteworthy that through its fieldwork in early July, EcoLogic has the most detailed and accurate information about the terrain, flora and fauna of this watershed. The EcoLogic representatives in attendance at the July 4th meeting noted the extremely irregular terrain in the watershed; information which WFP concedes it has not obtained, having not undertaken any recce work in this location.

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The slide 10 map and graph indicate that WFP has reduced the area of merchandisable timber (ECA) in the McKelvie Creek watershed from previous presentations to Council. You confirmed this reduction was due to Glynnis Horel's 2017 study of the McKelvie watershed which concluded that landslides and erosion are both more impactful and more likely than WFP had previously concluded. The EcoLogic study will offer more robust data to further inform decisions about this watershed.

Climate Change

From page 15 of the Information Package:

There is significant scientific agreement that climate changes will affect forest ecosystems and that forest management practices will need to adapt. However, the rate and amount of change is uncertain. Given the uncertainty no modelling of climate change impacts is planned. As better information becomes available it can be incorporated into future timber supply analyses.

There are a number of problems with the above stated position:

- WFP has developed and implemented Forest Stewardship Plans which address other emerging issues where there are high levels of uncertainty, e.g., species at risk. As a company, WFP has the resources to fully address the impact of climate change in the draft Information Package. In our view, this is a glaring omission from the package.
- There are evidence-based planning tools publicly available that engineers, local, regional and provincial planners and scientists are using to make predictions about the impact of climate change on ecosystems around the world. We believe it is disingenuous for WFP maintain that uncertainty augurs for ignoring climate change in the context of this TSR.
- For example, the Pacific Climate Impacts Consortium at the University of Victoria provides practical information on the physical impacts of climate variability and change in the Pacific and Yukon Region of Canada. They collaborate with climate researchers and regional stakeholders to produce knowledge and tools in support of long-term planning. For example, this consortium has produced weather anomaly maps based on climate change for locations within TFL 19.
- If WFP is to continue to maintain, as per the above statement in the draft Information Package, that climate change cannot be modelled it should be required to demonstrate the research it has conducted to reach this conclusion and to publicly share its research for public scrutiny.
- WFP should also be required to articulate what standard of information it requires in order to incorporate climate change into its draft Information Package, if it objects to addressing climate change impacts at this juncture in the TSR.

We would expect the Chief Forester to require WFP to take full account of the impact of climate change in TFL 19 in its information package as the data and research are readily available and WFP has the resources and obligation to do so.

Tahsis Flood Risk Assessment

A Flood Risk Assessment report was completed this month updating floodplain maps, including the hazards and risks of flooding along the Tahsis and Leiner Rivers and incorporating sea level rise predictive data.

Some of the key objectives of the study included:

- Integration of detailed topographical survey (river bathymetry and LIDAR imaging)
- Regional hydrological analysis based on historic recorded data collected in comparable watersheds in the region
- Technical modeling of rivers and sea interactions with various storm events
- Flood hazard map showing the inundated areas, the estimated water depth and velocity and the resultant combined hazard rating
- Flood risk map showing the potential for risk to life, property and/or infrastructure due to the identified flood hazard
- Development of a long-term strategy to reduce impacts of flooding on the community while protecting the ecological, economic and cultural values of the rivers and floodplain.

As timber harvesting in the Tahsis, Leiner and McKelvie Creek watersheds will influence the discharge volumes in the Tahsis and Leiner Rivers and McKelvie Creek, this information is being shared so WFP can further refine its ECA in the Tahsis and Leiner watersheds.

The Flood Risk Assessment is available on the Village website:

https://dl.mcelhanney.com/2019_07_23_uRzB/23_G5JetG1/49140TahsisFloodRiskAssessmentFinalReportComplete.pdf

Tahsis Wellhead Protection Plan

The Village completed a Wellhead Protection Plan for its community production well in April 2019 which is a requirement under the *Water Sustainability Act*. The plan establishes the source water protection and contaminant source inventory. The hydrogeological review determined that the Capture Zone for the production well connects it to McKelvie Creek through well-sorted alluvial sediments deposited from the Tahsis River interlayered with poorly sorted fan deposits from McKelvie Creek. This is important as it confirms that McKelvie Creek feeds the aquifer which is the primary source for Tahsis' drinking water. WFP maintains that since the Village does not use McKelvie Creek surface water as its primary drinking water source, having switched to a groundwater well in 2016, that McKelvie Creek no longer serves as the primary drinking water source for Tahsis residents. This study proves otherwise.

While recognizing that in setting the annual allowable cut volume for TFL 19 for the next ten year period the Chief Forester cannot establish forest practices that vary from the statutory and regulatory regime, it bears noting that there is a direct correlation between volume of timber harvested and the magnitude of environmental impacts. In the July 30, 2019 BC Auditor General's report titled "The Protection of Drinking Water" the audit found that "risks to drinking water are increasing". And that "drinking water sources are at risk from a number of factors, including industrial practices, such as forestry, oil and gas, and mining."

Having established that McKelvie Creek is the primary source of the Village of Tahsis groundwater well and recognizing that forest practices put drinking water at risk, this information ought to be considered in the TSR.

In light of the Auditor General's findings and recommendations, we will also be raising our concerns about the implications of timber harvesting activity in the McKelvie Creek watershed with the Vancouver Island Health Authority and the Ministry of Health.

The Tahsis Wellhead Protection Plan is also available on the Village website:

<http://villageoftahsis.com/wp-content/uploads/2019/06/2221-49140-WPP-Final.MDstamp.2019-04-04.pdf>

In conclusion:

- The Village is undertaking a study to more fully understand the terrain, hydrogeology, and ecology and the risks associated with timber harvesting in the McKelvie Creek watershed -- this study should be considered in the TSR;
- We expect WFP to take full account of the impact of climate change in its timber supply analysis; and
- Timber harvesting impacts on McKelvie Creek will directly affect the Village of Tahsis drinking water and could exacerbate flood events. These facts should also be considered in the TSR.

Thank you again for your presentation to Council. We look forward to receiving the next iteration of the Information Package.

Respectfully,



Mayor Martin Davis on behalf of Tahsis Council

cc: Diane Nicholls, Chief Forester, Ministry of Forests, Lands, Natural Resource Operations and Rural Development