



Elphinstone Community Association

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November 7, 2024

Sydney Goward, Planning Officer
BC Timber Sales
Chinook Business Area
7077 Duncan Street
Powell River, BC
V8A 1W1

Dear Ms. Goward

RE: Planned logging of cut block TA0519 on Mt. Elphinstone South

Introduction

As you know from our previous correspondence of September 15, 2023 to Pierre Aubin, the residents of SCR D Area "E" (Elphinstone) are opposed to logging in the reference cut block due to concerns for downstream property damage, Aquifer 560 recharge, and loss of salmon habitat.

Several of us have noticed new "cutting boundary" flagging tape on Elphinstone South in the area of the proposed cut block TA0519. We have explored the flagged area.

The 2023 Polar watershed assessment report states an equivalent clearcut area (ECA) above the mouth of Chaster Creek of 33.9% while acknowledging that the maximum ECA should be only 20% to minimize negative effects on the watershed. That's almost 75% more than the maximum ECA. The report also admits that the current hazard level is "high" at the mouth of Chaster Creek. It gives examples of flooding damage that has already occurred near the mouth of the creek and in the lower ravine. Based on the excessively high ECA, the high hazard level and the damage that has already occurred, residents believe there is no excuse for further logging to increase the risk to property owners in the watershed.



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Now that we have seen the proposed logging area in TA0519, we have a number of new concerns. We expect these concerns will be considered in the next study phase and hopefully provide further reasons to abandon the planned logging completely as we previously requested. Abandonment is still our main request of you.

1. Change in Location

The shape and location of the cut block has changed substantially from what was proposed on the five year operating plan map dated 2023-06-12 (which itself had been changed from the previous operating plan). The upslope move of the area changes the type of timber from young trees to more mature trees. The westerly move affects the Smales Creek watershed. These so-called adjustments make it look like there is no real long term plan at all other than to log the most profitable timber as quickly as possible, which we know is unsustainable. How is the public supposed to give meaningful feedback if the area to be logged keeps changing? When is the operating plan map going to be updated?

2. Chaster Creek Tributaries and Subsurface Water Flow

At least ten small seasonal tributaries making up the headwaters of Shirley Creek, the main tributary of Chaster Creek, flow from cut block TA0519. We notice that the main ones have been identified, followed through the bush, and marked with flagging tape. At least one of these tributaries was noted to have skunk cabbage and devils club growth, suggesting a wetland environment on the gentler slope aspect near the top of the cut block.

These stream tributaries dry up in the summer, but we have reason to believe that there is subsurface water flow long after they dry up on the surface. This subsurface water provides (1) base summer water flow in the lower creek where coho salmon fry mature and (2) source water to Aquifer 560 mountain block recharge. Therefore, maintaining this subsurface water flow needs to be considered in any plan to log TA0519. Our concern is that the slow release of ground water throughout dry summer months will be lost. As well, runoff will occur too quickly causing winter flooding.

We expect to see generous natural riparian areas around each tributary, especially in wetland-like environments in any future plan. Additional measures, like thinning outside of the riparian area (not inside), are also needed to prevent the blowdown of riparian area trees.



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3. New Road Building

From the flagging we've noted, it seems that a new road (ELPH 1031?) is envisioned to access TA0519. There is already an existing logging road, now shown as the Highline Trail (aka SR03-027). Why not just use that? If a new road at a higher elevation is essential, BC Timber Sales should at least follow the existing West Ridge logging road up to the new road elevation instead of cutting a whole new ROW immediately adjacent to that road. The road and westerly move of the cutblock appear to be into Smales Creek watershed which the Polar report suggest only 2.2 Ha may be harvested. At a minimum, any area cleared for roads needs to be subtracted from the allowable ECA recommended by Polar in their 2023 assessment. We believe that the cut area in Smales creek watershed may be more than that recommended by Polar.

Furthermore, it is our opinion that building roads that contour across the upper reaches of the main tributary to Chaster Creek disrupt the natural flow of ground water. Damming ground water flow by ground compaction that will result from building and using a new road, then collecting the dammed up water in ditches and passing it through culverts to discreet drainages is no substitute for natural seepage into numerous small tributaries. We believe that building new roads across the mountain side is bound to affect residents living downstream in our area by increasing flooding frequency in the winter and decreasing water flows in the summer.

4. Hydrology stations

We have followed with interest the rebuttals and surrebuttals to Polar's Phase 2 Watershed Assessment by Dr. Alila and the Town of Gibsons. At issue is a deterministic versus a probabilistic approach to determining the effects of logging on winter-high and summer-low water flows. Reports from residents indicate our residential areas experience more winter flooding and summer drought now than in the past. As well, there are definitely fewer salmon fry in Chaster Creek now than in the past. Additionally, the Town of Gibsons has requested more hydrologic data be collected to ensure that Aquifer 560 remains the vital source of viable drinking water that it is for their community.

We request that BCTS install hydrology stations on the main Shirley Creek tributaries to resolve the deterministic/probabilistic issue brought up by Dr. Alila, and to fulfill the Town of Gibsons' request for more monitoring. As part of the Sunshine Coast Regional District, our residents also rely on Aquifer 560 and some of our residents rely on wells in the surficial Capilano formation. We feel that data generated by hydrology stations on Shirley Creek will be important to the arbitration of damage claims brought by our residents or other authorities if logging of lot TA0519 affects down



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stream residents' property, salmon habitat, or drinking water availability more than predicted by Polar.

5. Aquifer 560 Recharge

Cut block TA0519 is located directly above sedimentary sandstone and siltstone bedrock, up slope from the igneous bedrock underlying Aquifer 560. It is understood that the primary (55%) recharge of Aquifer 560 is through mountain block recharge - i.e. through fissures and fractures in the bedrock. We believe that it is risky to log lands over these sedimentary rocks which probably contribute a large proportion of the mountain block recharge that enters Aquifer 560. The failure to understand the effect of the sedimentary/igneous interface on aquifer recharge is an issue we wish to raise with you. The fact that the significant amount of mountain block recharge occurs over decades is not a reason to suggest that logging can proceed. Rather it is a reason to proceed with caution, if at all. In our view, a good deal more study is needed.

6. Recreational Trails

Within the cut block there are numerous recreational trails used by mountain bikers and hikers alike from our community. The main trail passing through cut block TA0519 is the Highline trail (aka SR03-027). Several new wooden bridges have been constructed over small ravines along that alignment. Trails extend up to the West Ridge road and down to SR7575 Br03 through the cut block.

The new road alignment as marked out looks like it might ruin access to the Highway 103 trail which is a major cross country route providing access to many hiking and mountain bike routes that lead from it.

Many hours of community volunteer work have gone into building and maintaining these trail systems. We request that any logging plans recognize these trails. Further, we request that any trails disrupted by logging or road building be replaced quickly. This is only asking that you be a good neighbour to the residents and businesses you are affecting by your activities. It should be simple and cheap to comply with this request as heavy equipment would be at your disposal while road building and logging.



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7. Flora and Fauna

As we walked through the area, we noticed numerous hoof prints of elk that had passed through, as well as the abundance of Pacific Orchids growing within the cut block area. It would be a terrible shame to lose these shade-loving orchids due to clear-cut logging. Worse though, might be the loss of a wildlife corridor for the elk migration on the Sunshine Coast. We have not seen any studies of elk movements in Mt. Elphinstone South to determine the effects of logging activities and logging after-effects on the elk population. Logging planning should be delayed until these issues are investigated more thoroughly.

Conclusion

It is our view that logging has no place in the head waters of an important community watershed like Chaster Creek. We understand that TA0519 is a small area relative to the overall size of the watershed. However, we the downstream residents will suffer an outsized consequence of this tiny logging play. In our opinion, it is not worth putting this cut block up for auction with all the serious potential risks we've presented here. We would like to see it removed from the B.C. Timber Sales' plan. We request that you again reconsider the viability of logging TA0519. Thank you for considering the issues we have brought to your attention.

Yours Respectfully,

Brian Thicke
Elphinstone Community Association (ECA)

This letter was review and approved at the October ECA General Meeting.

Rod Moorcroft
President



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Cc

MLA, Randene Neill; Minister of Forests, ;Deputy Minister Forests, Richard Manwaring; Minister of Water Lands and Resource Stewardship, ; Deputy Minister of Water Lands and Resource Stewardship, Lori Halls

SCRD Chairman Leonard Lee, Area E Director Donna McMahon, Planning Ian Hall

Town of Gibsons Mayor Silas White, CAO Emanuel Machado, Natural Assets Michelle Lewis

shíshálh Nation: Lenora Joe,

Sḵw̓x̓ wú7mesh Úxwumixw (Squamish Nation) Khelsilem

Others : SCCA ECA