Sunshine Coast Conservation Association

Elphinstone Community Association

April 30, 2025

Premier, David Eby
Minister, Water, Land, and Resource Stewardship, Randene Neil
Minister, Forests, Ravi Parmar
Minister, Emergency Management and Climate Readiness, Kelley Greene
Minister, Indigenous Relations and Reconciliation, Christine Boyle
CC: Squamish Nation Council, SCRD Board of Directors, Town of Gibsons Council

Re: Protect Drinking Water: Defer BCTS Logging on Mt. Elphinstone & Support a Water Sustainability Plan

Dear Premier and Ministers,

We urge the Province to **immediately defer logging** in Mt. Elphinstone's critical aquifer recharge area and **support a collaborative Water Sustainability Plan (WSP)** for this area. This action is essential to safeguarding drinking water for thousands of Sunshine Coast residents, protecting private wells, and mitigating downstream flood risk. Without intervention, BC Timber Sales (BCTS) will proceed with its logging plans, which present irreversible harm to this watershed.

Drinking Water, Wells, and Infrastructure at Risk

Aquifer 560 is the **sole drinking water source for the Town of Gibsons** and a growing backup supply for the Sunshine Coast Regional District (SCRD). **The SCRD increasingly draws from Aquifers 560 and 552** to reduce pressure on the overburdened Chapman watershed system. Aquifers on Mount Elphinstone also supply dozens of **private wells** in the rural areas.

The mature forests over water-rich sedimentary bedrock on the southern slopes of Mt. Elphinstone play an essential role in **recharging these aquifers** by capturing, filtering, and gradually releasing rainfall and snowmelt. They **regulate groundwater flow**, **reduce erosion**, and **mitigate downstream flooding**. Logging in these sensitive headwaters threatens this natural system—and the homes, infrastructure, and public health that depend on it.

Risks of Flooding and Loss of Aquifer Recharge

In 2022, the Sunshine Coast experienced a **severe water supply emergency.** In 2021, we experienced **significant floods** during atmospheric river events. In 2021, Whittaker/Smales Creek experienced a **massive washout** following the upland logging of BCTS' District Lot 1312, which led to the evacuation of multiple properties and impacted MOTI infrastructure. Climate change will only intensify the risks of drought and flooding. Logging in aquifer recharge zones will only further degrade the watershed's ability to store water and manage flows.

BLOCK TA0519

We are deeply concerned about BCTS' plans for a proposed cut-block located in the recharge area of Aquifer 560, which also threatens the Capilano Aquifer used by local residents. This block has been in BCTS's plans since 2020, with an **initial harvest set for 2027; now the auction date has been moved to July 2025, making this an urgent issue.** The proposed logging of block TA0159—38.4 hectares in the heart of the Aquifer 560 recharge zone is especially concerning because it is directly upland of the 2021 washout. BCTS is proposing an **unproven "partial harvest" experiment within a vital aquifer recharge zone** without plans to monitor impacts on tree survivability from windthrow, groundwater, soil, or surface runoff. This approach is **untested in similar terrain** and overlooks the area's complex hydrological system.

Inadequate Justification from BCTS

BCTS cites the 2023 Mt. Elphinstone South Watershed Assessment to justify its plans. However, that report does not assess groundwater or aquifer recharge. It lacks site-specific data and only offers general qualitative observations. It is not an appropriate foundation for forestry in a drinking water aquifer recharge area. See our Critique of Groundwater Assessment in the Mt. Elphinstone South Watershed Report below.

A Clear Path Forward: Protect Water, Plan Together

We are calling on the Province to use its authority to:

1. **Defer logging** in the Mt. Elphinstone recharge area under Part 13 of the Forest Act and Section 7 of the Environment and Land Use Act;
2. **Support the immediate development of a Water Sustainability Plan** under the Water Sustainability Act, bringing together First Nations, local governments, water users, and community stakeholders; and
3. **Suspend further timber sales,** including TA0519, pending the outcome of the WSP.

This approach mirrors what is already being done to protect critical drinking water sources in other BC communities. It is reasonable, lawful, and necessary.

In Summary

Logging in drinking water recharge areas without proper scientific assessment or community consent is incompatible with the Province's commitments to Indigenous rights, sustainable resource management, and climate resilience. The Water Sustainability Plan process is the only available legal tool to bring all voices to the table and ensure long-term water security for this region.

Sincerely,

Suzanne Senger, Executive Director, Sunshine Coast Conservation Association
Rod Moorcroft, Chair, Elphinstone Community Association

APPENDIX 1

Legal Tools Available to the Province

Forest Act – Part 13 (Section 169-171)
This allows the Cabinet to establish a **temporary moratorium** on logging in areas with high ecological, cultural, or hydrological value. The Province can issue a Part 13 order to defer timber harvesting in the Aquifer 560 recharge zone while planning proceeds.

Environment and Land Use Act – Section 7
Section 7 empowers the Cabinet to restrict land use or resource activity where it may conflict with environmental objectives. It also provides authority to protect the recharge zone in the public interest.

Water Sustainability Act (WSA) – Section 65
This Act authorizes the Province to create a **Water Sustainability Plan** for watersheds that face significant risk to water sustainability or where multiple interests conflict.

A WSP can:

- Designate and protect recharge zones.
- Integrate water and land use planning.
- Ensure First Nations and community participation.

Why This Matters

- Logging in recharge areas jeopardizes aquifer function and downstream water users.
- The proposed cutblocks are not based on sound hydrogeological science.
- A Water Sustainability Plan provides a proactive, collaborative path forward.

Conclusion
The Province has clear legal tools and a compelling reason to act. Deferring logging and supporting a WSP will protect critical drinking water sources and uphold public trust.

APPENDIX 2

SCC-ECA Critique of Groundwater Assessment in the *Mt. Elphinstone South Watershed Report (Phases 1 & 2) Prepared by Polar Geoscience Ltd. for BC Timber Sales (July 2023)*

The Mt. Elphinstone South Watershed Assessment, prepared by Polar Geoscience Ltd. for BC Timber Sales (July 2023), acknowledges groundwater as a value at risk and includes general discussions about aquifer recharge. However, it fails to provide a substantive or scientifically robust assessment of the actual impacts of logging on groundwater. Key limitations include:

Lack of Quantitative Analysis:
The report lacks hydrological modelling, water balance calculations, or recharge estimates to quantify the effects of forest removal on groundwater levels, flow paths, or seasonal recharge variability.

Absence of Monitoring Data:
No well monitoring data or temporal trends in groundwater levels that might indicate sensitivity to forest disturbance are incorporated. This omission overlooks a crucial line of evidence for assessing the risk to domestic and community water users.

Overreliance on Conceptual Models:
Using a single schematic (Figure 6.6) to represent potential flow pathways is not a substitute for field-based or modelled hydrogeological analysis. The document lacks site-specific data on soil permeability, subsurface stratigraphy, or aquifer-surface water interactions.

Generalized Risk Ratings:
Section 6.1.3 assigns qualitative hazard ratings to groundwater recharge in various watersheds, but these ratings are not tied to measurable thresholds or site-specific investigations. They are speculative and provide little actionable insight.

No Consideration of Cumulative Effects:
The report does not evaluate the cumulative impacts of current and proposed forest development affecting recharge zones that support already-stressed aquifers, particularly in urban interfaces where many residents rely on groundwater.

Misalignment with Community Concerns:
Given well-documented local concern over groundwater sustainability, especially along Reed Road and other developed areas, the lack of meaningful groundwater analysis represents a serious oversight in an area where groundwater is essential for human and ecological needs.

In summary, this report falls far short of providing the level of detail and scientific rigour needed to evaluate logging-related threats to groundwater in a changing climate. A

comprehensive hydrogeological assessment, including site-specific data, modelling, and monitoring, is urgently required before further developing this sensitive area.

Watershed Assessment Methodology

Recent research by Dr. Younes Alila of the University of British Columbia underscores the critical role of forest cover in regulating hydrological processes. His studies demonstrate that **logging significantly increases flood frequency and magnitude,** particularly in snow-dominated regions.

For instance, harvesting 21% of the forest in the Deadman River watershed led to a 38% increase in the average flood size. Under similar conditions, the Joe Ross Creek watershed experienced an 84% increase.

These findings underscore the profound impact of forest removal on watershed hydrology, highlighting the need for sustainable logging practices to mitigate flood risks.

Dr. Alila advocates for a probabilistic approach to flood risk assessment, considering multiple interacting factors, including snowpack levels, rainfall, and landscape characteristics. **This comprehensive methodology contrasts with BCTS's traditional deterministic analyses, providing a more accurate understanding of the** risks associated with logging activities.

In light of Dr. Alila's research, the current watershed assessment's failure to incorporate advanced hydrological modelling and probabilistic risk assessment methods **represents a significant oversight.** Integrating these approaches is essential for accurately evaluating the cumulative impacts of logging on groundwater resources and flood risks.

Recommendation:

Before proceeding with any further logging activities in the Mt. Elphinstone South area, **a comprehensive hydrogeological assessment** that incorporates site-specific data, advanced modelling techniques, and probabilistic risk assessments is imperative. This will ensure a thorough understanding of the potential impacts on groundwater resources and inform sustainable forest management practices that safeguard human and ecological communities.