



Over two years have elapsed since VIWPS's initial presentation to the Cowichan Watershed Board (CWB), requesting approval of our request to include recreational value in the weir replacement design.

Despite the CWB's supporting comments, and the approval from the Cowichan Valley Regional District Chair at that time, the CVRD has been unwilling to engage with us, to integrate our small request into the weir design..

The weir design process has now been declared 'closed'. We know that time is short, but construction cannot begin until the license holder has been approved. There is still time to complete the minor supplementary engineering needed to integrate our project.

Other 'recreational' weir features have attained at least partial engineering in the design, including the boat lock, the walkway, and the portage trail. Yet our project remains shut out of the process.

Clearly, the hard work paddlers have done to support the CVRD's *2018 Water Use Referendum*, the *WEIR READY* initiative, and the application to secure a grant from the BC Salmon Restoration and Innovation Fund (BCSRIF) have been ignored.

Similarly, the support we've provided for the CWB's many initiatives has also been disregarded. Where is the sense of 'partnership' so eloquently articulated by Chief Seymour on the CWB webpage?

Functional parameters for the weir design were established in the *2018 Cowichan Water Use Plan (CWUP)*. In no way does our project violate those parameters. Recreational features will not alter water storage, fish passage, habitat, or riparian integrity.

Further, the CWUP specifies only broad functions to be attained by the replacement weir. The plan does not specify engineering details. As administrator of the weir design, the CVRD can integrate any minor alterations which comply with the intent of the functional parameters.

We are aware that the BCSRIF does not permit its grant to be used for functions which do not support salmon. But there is no reason why the CVRD could not pursue supplementary funding for recreation. Further, we wonder whether the rebuilding of the boat lock is funded by the BCSRIF grant. Does it support salmon? (Ironically, adding recreational value to the weir will likely pay for itself, as it stands to generate tourist revenue.)

As tax-payers, we know that the new weir will comprise public infrastructure, financed by government funding. Yet, to date, strong tax-payer opinion has been ignored in the design process.

Response to the CVRD's public survey and PlaceSpeak dialog clearly shows that the public expects a maximum array of functions, including recreation, to be integrated into the new weir. Fully 78% of respondents supported our project's inclusion in the design.

These points, among others, are documented more fully in our attached appendices.

Respectfully, we request your strong support toward getting our project back on the CVRD's table for immediate action. We've already raised approximately \$11,000 toward a feasibility report, which indicates that our project will work. We remain committed to supporting the CVRD by collaborating on further grant funding applications.

We'd like nothing more than for our upcoming press release to announce a WIN / WIN solution!

In the meantime, we'd be up for an informal chat to discuss our request.

Respectfully Yours for Diversity in Watershed Management

Edmond Duggan and Rick Bryan
Vancouver Island Whitewater Paddling Society

Appendices

The following appendices to our letter provide additional background, elaboration, and rationale concerning our request.

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A. Preface

The replacement weir design is bold. Our proposal to add one or two play waves just below the new weir is modest in scope. It will not adversely affect water storage, fish passage, habitat, or riparian integrity. Public opinion clearly supports the integration of recreational value into this infrastructure.

Outdoor recreation is known to relieve stress which has been linked to mental health issues. Whitewater boating is renowned for green practices, a commitment to safety, education, and youth engagement.

The value of river-based recreation continues to be overlooked as a legitimate component in watershed management. There is a need for river management practices to widen the view, and embrace diversity. Supporting and enhancing fish stocks is the highest priority. Recreation is one important priority worth embracing.

B. Acknowledgements

Special thanks for advice, recognition, and support: Darren Shepherd, Gary Lacy, Ian Morrison, Leroy Van Wieren, Alison Nicholson, Jill Thompson, Tom Rutherford, Tim Kulchyski, Shannon Waters, Kristine Sandhu, Bob Day, Ken Traynor, Katia Bannister, Danielle Paydli, Big Dancing Fish (Nora Livingston), Chloe Mitchell, Emily Duncan, Marty Blanchard, Christine Brice, Dan Norman, Sonia Furstenau, Cole Smith, Shae Thomas, Hannah Grant, Ellery Jackson-Renz, Ryan Bayes & Western Canoeing and Kayaking, Dira McClintock, Doug Magnuson, Keiran Rankin.

Extra special thanks to ALL members of the Vancouver Island whitewater community for showing up, pitching in, speaking out, and digging into your pockets! AMAZING support!

And, most of all, THANKS and LOVE to our spouses, Anna and Jaye, for putting up with “*Not now, Dear – I’m busy!*” while we worked on this project.

C. Community Vision

“If you already have a river, and you’re willing to embrace it, and get people interested in it, it’s going to be better for the health of the river, the health of the town – not only for the people in the community, but the wildlife that lives in the river.”

Hannah ‘Ray J’ Childs, Manchester paddling instructor, interviewed in video

https://www.youtube.com/watch?v=vtCRh_YDUYU

This short seven minute video shows what happened when an entire community worked together on a project to revitalize their river.

The outcome is a celebration of diversity, maximizing the value for an entire community including:

- professionals and amateurs,
- adults and kids,
- recreational features and habitat restoration,
- anglers and playboaters,
- people and fish.

Although the details of their project differ significantly from our weir replacement proposal, we believe we can learn – should learn -- from their success.

Just imagine...

D. Play Features 101

If our proposal for a limited number of whitewater play features isn't clear, just think of how skateboarders play in skate parks. They perform tricks with their boards on designed features.

Change the venue to a river, and the concrete structures to obstacles with water flowing over them. Swap the skateboards for canoes, kayaks and surfboards, and you can get the idea.

Whitewater play parks are commonplace on rivers in Canada and the US, but Vancouver Island lags behind. Calgary built Harvie Passage as a major whitewater attraction that replaced a hazard on the Bow River. Now the nearby town of Cochrane is actively considering building a whitewater park.

We are NOT proposing a complete whitewater park! We ask only for ONE or TWO play features to be created immediately below the outflow from the new weir.

'Play features' are hydraulic waves, formed by water flowing over obstacles such as rocks or ledges on the river bed. Two variables define play features: the flow, determined by the volume & speed of the river, and the obstacles' shape & size

A feature is ideal for recreation when the two variables are integrated:

- The flow, determined by the volume and speed of the river
- The shape and size of the obstacles

Appropriate features for play use are defined by:

- Size of the feature: not too big, not too small
- Safety of the location: away from hazards (trees in the water, whirlpools, sharks)
- Access to the play feature: eddies (calm water behind nearby obstacles) close enough to access to and from, the feature

When a feature is conveniently close to vehicle parking with easy access to the river, users will flock to it for its 'park and play' value. The weir adjacent to Saywell Park is an ideal site!

Do play features interfere with fish passage or habitat? NO! Play features are no more daunting to fish than are natural waves, holes and eddies. Fish often hang out in constructed play features, just like they do in naturally occurring features.

What's wrong with natural river features? NOTHING, sometimes! However as flows change, features may appear or disappear, and often their location is less than desired. But constructed features in a controlled area are predictable, reliable, and safe.

Creating an artificial wave requires controlling one, or both, of the variables defining the feature, the flow and the obstacle's characteristics - size, shape & location. There are two options:

1. CONTROLLING THE FLOW - A dam or weir provides controlled flows over obstacles (rock or concrete) that are installed permanently on the river bed. Costs to install fixed obstacles are relatively low. Obstacles made of rocks will last indefinitely with minimal maintenance, and look natural.
2. CONTROLLING THE OBSTACLES - Expensive hydraulic 'wave shapers' – huge adjustable flaps, under water, can create waves. The flaps can be adjusted continually, in response to fluctuating river flows, to maintain the feature. This option works when control of flows is unavailable – no weir or dam required. However these complex devices require maintenance, daily operation, and they consume power.

Which option for the Cowichan Weir?

NO question! – OPTION 1. Weir replacement is already in the plans. Controlling the flow is the reason behind improving the weir. The flow required for one or two play waves would be released within the limitations imposed by the rule curve.

In addition, constructing static obstacles while the river-bed is exposed for weir-construction will minimize disruption to the river and will maximize cost-effectiveness of the build.

What do play features look like?

Kelly's Whitewater Park, Cascade, Idaho: controlled flows from large dam upstream

<https://www.youtube.com/watch?v=3l02FF5EKe8>

Bend, Oregon: hydraulic wave-shapers (on the big waves only)

<https://www.youtube.com/watch?v=PnKvbHOpDXU>

E. Paddlers and Partnerships

"Partnerships are so important. They build trust and understanding, which can open closed doors."

Chief William Seymour, Cowichan Tribes, CWB Co-Chair, CWB website 2018

Partnerships need not rely on formal quid-pro-quo contracts. But perhaps they encourage arrangements where both partners benefit equitably over a handshake.

In making our request, we are not sure whether the CVRD or the CWB really knows who paddlers are and what they do for the local community.

Since 2012, paddlers have worked hard to support local agencies and their initiatives, including the CVRD and the CWB, and especially the WEIR READY campaign.

- Sit on the Cowichan Stewardship Roundtable (CSRT), Koksilah Working Group (KWG) and the Cowichan Lake and River Stewardship Society (CLRSS)
- Worked/working on the committee to plan the Quw'utsun Heritage River Celebration; 2017, 2019, 2021, 2022 -- ran the popular Kids in Boats program
- Led a paddling trip & provided equipment for the BC Naturalists' Convention, 2019
- Supplied canoes for CSRT annual July meetings at Stoltz 2018, 2019
- Organized canoe kayak races for the 2018 BC Summer Games in the Cowichan Valley.
- Enlisted paddlers to help with CWB's Lower Cowichan River Cleanup and the CLRSS' Upper Cowichan River Cleanup since 2012
- Donated instructional services as Silent Auction prizes, for several agencies' fund-raisers
- Provided free coffee and snacks for KWG public meetings
- Advised and implemented internet technical services for the CWB and the CSRT
- Delivered free instruction and gear to stewardship summer students from several agencies to balance their work experience with related recreational opportunities. Got the Big Dancing Fish into a boat! <https://www.facebook.com/photo.php?set=p.4319626898155976&type=3>
- Worked for the Ad Hoc Coalition of NGOs in support of the CVRD referendum on Water Service in 2018; provided letter to the editor of local newspaper, the day before the vote
- Formed working partnerships with BC Parks and Cowichan Search and Rescue to promote safety and to mitigate river hazards
- Formed working partnership with the Fraser Basin Council's youth engagement program
- Donated instructional and promotional paddlesport service to the University of Victoria Kayak Club, in accordance with sound environmental standards and strict safety guidelines since 2012

F. Timeline of Paddlers' Involvement on the New Weir Project

Canadian paddlers tend to take rivers for granted. After all there're lots of rivers, wild and free. Exploit one and we'll find another!

Elsewhere, loss of access to rivers for recreational use is appalling. Archaic laws (UK) and unrestricted development (USA) have motivated recreational river users to find their voices. The British Canoe Union <https://www.britishcanoeing.org.uk/> and American Whitewater <https://www.americanwhitewater.org/> have mobilized their members to claim recreation's rightful involvement in river management.

Canadians lag behind. Vancouver Island has a major whitewater paddling community that's been active in advocating for river management which includes recognition of recreational values and needs.

The following timeline demonstrates that while the paddling community has supported several organizations, our request to enhance the weir has been DISREGARDED.

July 31, 2017 Paddlers visit the CWB; a PowerPoint presentation introduces the paddlesport community to the board and offers support toward common goals.

October 19, 2017 Paddlers join the Cowichan Stewardship Roundtable.

August 18, 2018 The CVRD confirms intent to hold a public referendum on Drinking Water and Watershed.

September 12, 2018 Rick Bryan joins the ad hoc coalition of NGOs supporting the referendum.

October 19, 2018 The Cowichan Valley Citizen publishes Rick's letter-to-the-editor in support of the CVRD's referendum. See page A-7
https://www.cowichanvalleycitizen.com/e-editions/?iid=i20181019040621294&&headline=Q293aWNoYW4gVmFsbGV5IENpdGl6ZW4sIE9jdG9iZXIqMTksIDlwMTg=&&doc_id=181019110647-889223d779084586935c41dcca0c30e

October 20, 2018 Voting Day – the referendum passes!

October 30, 2018 The Cowichan Water Use Plan is released. The plan includes performance parameters for a weir-replacement project. However it does not include any substantial mention of recreation. Details in Appendix G, below.

2019 The weir-replacement project and the WEIR READY campaign are launched. Paddlers support WEIR READY through work with various groups. At the CWB's request, Rick provides a supportive personal perspective article (one of a series) to the local paper.

May 15, 2019 CWB partners are working on an application for a major grant from the BC Salmon Restoration and Innovation Fund (BCSRIF). The intent is to finance development of the weir design, administered by the CVRD. The application needs letters of recommendation from supportive provincial associations.

Jill Thompson of the CWB contacts paddlers, requesting letters from their provincial sport governing bodies. The request came on a Wednesday with a deadline of the next Monday on a long weekend. Both Vancouver Island Whitewater Paddling Society (VIWPS) and the Recreational Canoe Association of BC (RCABC) write supporting letters. The application is successful; the grant is secured!!

June 1, 2019 Paddlers contact Recreation Engineering and Planning (REP), a company with a worldwide reputation for designing effective whitewater play parks. President Gary Lacy confirms that limited play features might be possible within the Cowichan weir replacement project. <https://www.repwaterparks.com/>

September 30, 2019 Paddlers deliver a presentation in support of adding recreational value to the weir replacement design at the regular monthly meeting of the CWB. Many paddlers show up in solidarity. The presentation clearly requests that if the project proves feasible, play features should be included in the weir design. Ensuing Board discussion is positive –See pp 2, 6-7, in the minutes at <https://cowichanwatershedboard.ca/wp-content/uploads/2019/10/DRAFT-MEETING-minutes-Sept-30-2019.pdf> .

Following the meeting, Co-Chair Ian Morrison prompts us to begin discussing project details with CVRD staff. Based on the positive comments from the Board, and Ian's directions, paddlers believe our project has been fully approved.

November 13, 2019 Two weeks after the presentation, the CVRD elects Aaron Stone to replace Ian Morrison as chair and thereby co-chair of the CWB. In this transition, we believe our project's approval is 'lost in the shuffle.'. It appears that senior CVRD staff are not apprised of our project.

January 21, 2020 Rick delivers our PowerPoint presentation for Leroy Van Wieren, newly-appointed project manager of the weir replacement project. Leroy's response is positive, but indicates he is not aware of the project's approval. Rick suggests that the project manager consult with the new chair and senior staff to confirm its approval. We guess that the consultation, if it happened at all, goes nowhere.

April 22, 2020 CVRD announces weir design contract is awarded to Stantec. Discussions about design engineering begin. Paddlesport representatives are not invited or included.

June 4 – 9, 2020 Concerned about our lack of inclusion in the weir design phase, paddlers email the directors and senior staff of both the CVRD and CWB. There was very little response and no action ensues.

June 12 – July 12, 2020 A total of 239 people respond to a public-input campaign designed to elicit public opinions about the weir project. The campaign includes both a survey, and a PlaceSpeak forum for comments.

July 22, 2020 Public-input results are released. 78% of survey respondents favour adding a recreational water course into the weir design. Similarly, about three-quarters of respondents' comments favour inclusion of whitewater features.

Also note that the survey response for a public recreational walkway over the weir is strongly supported – 63% in favour. Clearly, the public wants inclusion of recreational value in this public infrastructure project.

November 30, 2020 At a CWB meeting, Project Manager Van Wieren confirms that the BCSRIF grant precludes use for design features which don't directly support salmon. Therefore our project is rejected.

In subsequent conversation with CVRD senior staff, paddlers ask "Would the CVRD seek alternate funding to cover our project?" The response is a blunt "NO". The CVRD suggests we commission a feasibility report at our own expense, with no guarantee that if a feasibility report is positive, our project will be included in the weir design.

Putting this into perspective, paddlers willingly donated their time over a long weekend to provide the CVRD with letters of support for a BCSRIF grant, which excludes our project. In turn, the CVRD refused to seek alternate funding to include play features.

December 10, 2020 Project Manager Van Wieren hosts a public virtual meeting to present Stantec's preliminary weir design, and to respond to previously-elicited public questions. Because so many questions ask about the inclusion of our project in the design, the choice is made not to respond to them individually. The report includes no steps toward inclusion of the play features request.

However, questions about inclusion of a recreational walkway over the weir are also listed. The reply given is "A pedestrian walkway IS being designed. Because it is an option, and not necessary to make the weir function, it will be designed and costed for the future owner to consider whether or not it will be included." Paddlers wonder how a recreational walkway gets "designed and costed" where recreational play features do not.

A paddler suggested that omitting a portage route around the weir/boat lock when it was originally constructed was an oversight.

December 15, 2020 Paddlers contact Gary Lacy of REP advising him that, subject to fund-raising goals, paddlers will request a site visit and a feasibility report sometime in late spring. Gary proposes to contact Darren Shepherd, president of SG1 Water Consulting Ltd (SG1), in Edmonton, Alberta as boarder crossings with COVID would impede a visit. Darren has had extensive experience working with REP on many whitewater projects. He is agreeable to doing the site visit. They both will collaborate on the site analysis, and the development of the report.

January 11, 2021 VIWPS forms a playfeature fund raising committee to commission a feasibility report. Proposed funding sources include direct donations from paddlers, a raffle; and applications for grants-in-aid.

January 18, 2021 In anticipation of SG1's proposed site visit, Project Manager Van Wieren offers to provide technical material from Stantec's design to them for a more complete understanding of the site and the technical design. Paddlers are grateful!

The project manager post in his Leroy's corner blog addressing the many questions he has received on whitewater recreation.

"The whole notion of another form of recreation is important in my estimation, however it needs to be brought forward in a planful way and start fitting into strategic plans for local communities such as the CVRD and the Town of Lake Cowichan. Strategic plans usually look ahead 5 or more years and these new ideas need to be integrated into those systems for long term support and success."

"I certainly appreciate your energy and enthusiasm and coming forward with such a strong and cohesive voice. I suggest keep your agenda moving forward by integrating your ideas into the local governments planning processes."

<https://cowichanlakeweir.ca/2021/01/18/whitewater-recreation/>

March 16, 2021 Rick presents to the Town Of Lake Cowichan's Parks Committee, asking for support. Subsequent conversations with Mayor Bob Day indicate that while the mayor and council see our project's potential value to the town, they don't wish to express official support at this time.

May 3, 2021 The Cowichan Valley Citizen publishes an article titled: "Paddlers hope Cowichan River weir could include some whitewater". The article was based on information copied directly from the March 16 presentation to the Town of Lake Cowichan's Parks Committee, used without permission. https://www.cowichanvalleycitizen.com/news/paddlers-hope-cowichan-river-weir-could-include-some-whitewater/?fbclid=IwAR1ZEly7GxOA_d_9EF0iS5s8DcJt43UL3RQNQyffYP0IXFbW28cYe2yFIM

CBC Radio, having seen the article, invites Rick to an interview on Gregor Craigie's On the Island program, the following day.

May 4, 2021 Gregor Craigie briefly interviews Rick on air for CBC's Victoria radio station.

May 12, 2021 VIWPS' fund-raising committee completes its campaign. Paddlers have raised approximately \$12,500 toward the goal of \$9,000. Broken down, the funding falls into: direct donations from paddlers -- \$5,500; raffle proceeds -- \$6,000; grants-in-aid (CVRD) -- \$1,000. VIWPS is ready to commission a feasibility report from REP/SG1 engineers.

May 13, 2021 Plans are made for Darren Shepherd of SG1 to make a site visit on June 22, 2021 to generate a feasibility report. Invitations will extend to Leroy Van Wieren, Stantec representatives, and Ian Morrison of the CVRD. Also, Tom Rutherford of the CWB, and Tim Kulchyski of the Cowichan Tribes. will be included.

June 22, 2021 The site visit occurs with Darren, hosted by Edmond and Rick. Regrets come from Leroy, Tom, and Tim. Ian arrives briefly to discuss the visit, but has another pressing engagement to attend; his appearance is much appreciated. The group tours the weir from the water level by canoe and kayak. Darren observes closely, uses a drone to provide an aerial view, and takes extensive photos. Following the weir inspection, the group heads downstream to check two possibilities for a potentially-alternate location; the drop at Greendale Trestle, and the stretch near Little Beach.

June 28, 2021 Paddlers meet virtually with SG1 and REP to discuss results from Darren's site visit and the resulting engineering consultations between the two firms.

Key summary points from this investigation:

- One or two waves are likely feasible with enough head just below the new weir.
- Most likely location would be near the South bank, where the current fish passage is located.
- The movement of fish do not appear to be affected by the presence of play boaters on the surface.
- This location would be a safe option for tubers.
- Some geological and hydrological data needs to be examined. There appears to be very little hard data in Stantec's preliminary design, as presented publicly.
- Confirmed that Greendale Trestle and Little Beach sites are not really feasible for play features.

"A modest recreational request like this should be a slam-dunk! There are so many reasons why your request makes sense." Gary Lacy, REP

July 8, 2021 Project Manager Van Wieren stages a project update, featuring a video of the final design. He announces that "The design phase is complete."

During the update there is a slide showing an example of a portage access point near the weir. Edmond raises concerns about the design in the meeting as well as in a follow-up email.

August 18, 2021 Project Manager Van Wieren convenes a virtual meeting including Matt Woods from Stantec, Darren, Gary, Edmond, and Rick. Discussion focuses on technical issues concerning two feasible locations for play features: below one of the release gates, or integrated into the south fishway. Either location would need to be modified. The release gate is favoured by Stantec. The fishway is favoured by REP & SG1. Discussion occurs, but no consensus is reached. Leroy points out that, regardless, it is too late to include features in the design, which has been declared complete.

August 27, 2021 Edmond meets with Stantec engineers and Leroy Van Wieren to discuss ideas about improving the proposed portage access point. The design presented on the 8th of July has several usability issues. Stantec welcomes the feedback and will consider improving the access point. The project manager states that the portage is another item that will be presented to the future owner as an option for their consideration.

September 7, 2021 Disappointed by the lack of response from the CVRD and the CWB to our ongoing request, paddlers send letters via email to Aaron Stone, CVRD Chair, CWB Co-Chair, and Cindy Daniels, CT Acting Chief, CWB Acting Co-Chair, requesting a meeting to pursue a WIN / WIN solution to the ongoing inaction regarding our request. There is NO response from either. Further phone messages to both are ignored.

September 27, 2021 The request to present an update and engage in discussion with the CWB is declined, as the meeting agenda is full.

October 25, 2021 Our request to present an update and engage in discussion with the CWB is approved. Paddlers present a brief PowerPoint presentation, including information about the engineer's site visit, the feasibility report that followed, and the joint meeting on August 18th.

We also present one more request for official approval of our project. But because two preceding items on the agenda overspend their time-slots, there is not enough time to engage the board in a meaningful conversation about the status of our proposal.

December 9, 2021 Press releases indicate that Lori Iannidinardo is elected CVRD Chair and thereby CWB Co-Chair. The paddling community welcomes her leadership.

G. Examining the Water Management Plan

In this appendix, quotes taken from the management plan are in normal text like this sentence.

Comments are displayed with a light grey background like this text.

COWICHAN BASIN WATER MANAGEMENT PLAN MARCH, 2007

<https://cowichanwatershedboard.ca/wp-content/uploads/2019/04/CowichanBasinWaterManagementPlan-March2007.pdf>

p.iii “A total of 30 individuals were appointed to the Cowichan Basin Water Management Forum to develop the CBWMP. The members were:

Doug Allan, FutureCorp Cowichan
Tom Anderson Manager, Development Services, CVRD
John Baldwin, Dam Safety Auditor, Ministry of Environment
Larry Barr, Hydrologist/Engineer, Ministry of Environment
Don Barrie, Eco-tourism, Owner of Warm Rapids Inn
Ted Brookman, Recreational fishery sector
Ross Cameron, Youbou resident
Brian Dennison, Deputy Manager, Engineering Services, CVRD
Ernie Elliott, General Manager, Cowichan Tribes
Edward Gibson, Duncan resident, Somenos Basin Committee
Ian Graeme, Youbou resident, Professional Forester
David Groves, Farming (Cowichan Agricultural Society), aquaculture
Wayne Haddow, Regional Agrologist, Ministry of Agriculture and Lands
David Hignell, Eco-tourism, Owner of Sahtlam Lodge
Brooke Hodson, Youbou resident
Mark Holford, Acting Manager, Environment, Catalyst Paper, Crofton
Steve Lorimer, TimberWest, Manager, Public Affairs and Government Relations
Kevin Massingham, Public Works, City of Duncan
Kate Miller, Member-at-large
Cletus Peter, Cowichan Tribes
Wendy Porteous, Member-at-large
Clay Reitsma, Assistant Municipal Engineer, North Cowichan
Nagi Rizk, Superintendent, Public Works and Engineering Services, Lake Cowichan
Soleil Switzer, Biologist, Lake Cowichan resident
David Tattam, Agriculture
Shelley Thorne, Cowichan Tribes
Brian Tutty, Habitat Biologist, Fisheries and Oceans Canada
Michelle Vessey, Manager, Environment, Catalyst Paper, Crofton
Craig Wightman, Senior Fish Biologist, Ministry of Environment
Pamela Williams, Cowichan Valley Naturalists”

While Don Barrie was a known whitewater instructor, his business was a B&B, and he is identified in the list as representing only eco-tourism. Sahtlam Lodge is also identified in this group as representing Eco-tourism. It is possible that either member might have spoken on behalf of river recreationists, but we note no clear indication of meaningful outcomes. On the list of 30 participants selected to the forum, we note NO members designated specifically to represent the recreational river users: tubers, swimmers, and paddlers.

p.4 1.2 Why prepare a Water Management Plan?

“Previous water management in the Cowichan Basin consisted of an Ad Hoc Cowichan River Committee, with members from Cowichan Tribes, Catalyst Paper, Ministry of Environment, and Fisheries and Oceans Canada, making in-season flow management decisions during annual drought crises.”

p.3 “Thousands of visitors come to the Basin each year to kayak, inner tube, swim, and fish in the lakes and streams and to hike and camp along the shores... Water-based recreation, such as boating, swimming, and fishing, was also affected by the low flow in the river.”

If this estimate of recreational use is even close, it definitely underscores the need for a water management plan to include STRONG representation from recreational groups – particularly those for water-based recreation, which, as noted above, are “affected by the low flow in the river.” Clearly, the forum didn’t seem to do much research on exactly how recreationists are affected by low flows, or what they could seek to gain from a water management plan.

p.6 Public Input

“The public was encouraged to provide input throughout the planning process. Newsletters and response forms were distributed to Cowichan Basin residents at key stages of Plan development,”

It is important to note that the “thousands of visitors” who recreate in the Cowichan Basin are NOT necessarily Cowichan Basin residents. The Cowichan River is a DESTINATION, regularly attracting visitors from all over the Island, and beyond. The distribution of public input “newsletters and response forms” ONLY to “Cowichan Basin residents” seems inappropriate, unfair, and narrow-minded. Rivers don’t belong just to local residents.

p.22 6a-1 “Establish a Cowichan Basin Water Advisory Council (CBWAC) to guide the implementation of the Water Management Plan and improve the quality of water management decisions in the Cowichan Basin.”

NOTE that the diagram of proposed CBWAC Council Members (p. 26) includes one recreational fishing representative, but NO inclusion of any other recreational users – especially water-based ones. Yet, among the “thousands of visitors” (p.6) who recreate in the Cowichan Basin, fishing is only one small portion. This proposal appears to disregard tubers, paddlers, and swimmers.

p.29 “It is important (for the CBWAC) to maintain a dialogue between the water management Partners and members of the public that have expressed an interest in water management.”

This objective would be welcomed by the recreation sector IF recreationists had been given an equitable chance to express an interest in water management.

p.51 “Implementation Strategies:

Objective 5b. Build trust among water users, managers, regulators, and residents through communication and involvement.

5b-1. Seek opportunities to involve volunteers and form partnerships with nongovernmental organizations as the Water Management Plan is implemented.

-Increase the number of volunteers and NGOs engaged in WMP implementation.”

If recreational associations had been recognized and included in the list of NGOs, they would likely have supported this recommendation. Thus far recognition and inclusion apparently has not occurred.

p.D2 Membership

“The CBWAC should consist of about 20 people, ideally comprised of representatives from the following organizations or special interest groups:

- Cowichan Valley Regional District (Chair),
- District of North Cowichan,
- City of Duncan,
- Town of Lake Cowichan,
- Catalyst Paper Corporation,
- Cowichan Tribes,
- TimberWest,
- Ministry of Agriculture and Lands,
- Ministry of Environment, Fish and Wildlife Branch,
- Ministry of Environment, Water Stewardship Division,
- Fisheries and Oceans Canada,
- FutureCorp Cowichan,
- School Districts,
- public representative for recreational fishing interests,
- public representative for agricultural interests,
- public representative for recreational interests,
- public representative for lakeshore property owner interests,
- public representative for riverside property owner interests, and
- public representative for lower Basin interests.”

Recreational interests ARE included on this list, near the bottom, fourth from the end. That’s encouraging, and recreationists would have been grateful had the recommendation resulted in action.

Recreationists await the formation of a Council which includes “a public representative for recreational interests”. At this point, in 2022, we know of no group named Cowichan Basin Water Advisory Council, as proposed in this report.

Currently, among local groups providing leadership in river management, we note that most exclude river recreationists other than anglers. Two noted exceptions are BC Parks and Cowichan Search and Rescue.

Overall the CBWMP has firmly set the precedent to disregard the values and needs of river recreation in future river management plans. Whether that has happened through ignorance, or by intent, is irrelevant. The view is narrow; the need for diversity is disregarded.

H. Examining the Water Use Plan

In this appendix, quotes taken from the water use plan are in normal text like this sentence.

Comments are displayed with a light grey background like this text.

COWICHAN WATER USE PLAN: PAG FINAL REPORT AND APPENDICES OCTOBER, 2018

https://cowichanwupca.files.wordpress.com/2018/10/cowichanwup_finalreport_oct30_2018.pdf

https://cowichanwupca.files.wordpress.com/2018/10/cowichanwup_appendices.pdf

p.i “...the Cowichan Valley Regional District (CVRD), Cowichan Tribes, the Cowichan Watershed Board (CWB), and Catalyst Paper, partnered to initiate a community planning process to explore future water use needs and a range of different potential water supply and storage options.”

The intent to initiate community involvement was not particularly comprehensive with respect to defining or including a full range of the community. Apparently, the PAG didn’t do much research as to the diversity of interests comprising the community.

p.1 “This report documents the 8-month planning process carried out by the Public Advisory Group (PAG) for the Cowichan Water Use Plan (WUP)... Membership on the PAG represented a broad cross section of all the water use interests that may be affected through future potential changes in the water control facilities or their operations at the outlet of Cowichan Lake and included representatives from the CVRD, Cowichan Tribes, Lake Cowichan First Nation, Catalyst Paper, Cowichan Watershed Board, lakefront property owners, residents, local community groups (environmental, recreation, agriculture, etc.), industry, local municipal governments, provincial and federal governments...”

This statement is self-contradictory. Recreation was NOT included, either as an interest group, or through inclusion of individual representatives. See references below.

p.2 “Cowichan River is one of three rivers in BC designated as a Canadian Heritage River by the Canadian Heritage Rivers System (CHRS), based on its outstanding natural, cultural, and recreational values.

The watershed provides for an extensive range of tourism and recreation activities for both local residents and visitors to the area throughout the year, including camping, hiking, boating, kayaking, canoeing, rafting, sports fishing, swimming and tubing. Most tourism and recreation in the Cowichan Watershed is focused on natural features, which rely heavily on water as a key input.”

Of the three criteria listed by the CHRS for heritage river designation, cultural values were represented by including Cowichan Tribes. Natural values were covered by the inclusion of the Cowichan Valley Naturalists Society. We note no group included to speak specifically on behalf of recreational values, much less RIVER-BASED recreational values. The plan lists the groups in the PAG on page 7 and is listed below.

p.5 “At the October 2017 public meeting, individuals interested in volunteering to the Cowichan WUP PAG were invited to submit an application form. The application form was made available through the Cowichan WUP public website during the week following the public meeting and applications were accepted from people who were not in attendance.”

It is unlikely that the broad recreational community was aware of the process. The majority of Cowichan River recreationists are not local residents, and were unaware of the Cowichan WUP PAG selection process. To avoid bias and to guarantee fairness, input from outside the immediate locality should have been sought and honoured.

p.5 “In November 2017, the Cowichan WUP Public Advisory Group was formed with a mandate to identify and assess different water use alternatives for the Cowichan system and collaboratively develop recommendations for consideration by the Partner Organizations which may lead to submission to the provincial government. The PAG has representatives from government agencies; First Nations; industry stakeholders, community, recreational and environmental associations; and local municipalities.”

While there were environmental associations represented on the PAG, there were NO recreational associations represented, as per the list on page 7 (see below). It perhaps was inappropriate to include recreational and environmental associations in the same list item, and thereby claim full representation. The PAG should not have assumed that environmental representatives speak for recreation.

p.6 “Advertisements for the two public meetings were placed in local newsletters and newspapers in the weeks leading up to the meetings.”

As noted above, most recreationists using the Cowichan River are not local residents, and were thereby unaware of advertisements.

p.7 “Membership on the PAG consisted of a diverse range of water use interests and include representatives from the CVRD, First Nations, Catalyst Paper, residents, local community and interest groups (e.g., lakefront property owners, environmental, recreation, agriculture, etc.), and provincial and federal governments. Membership of the PAG was established in accordance with Steps 2 and 3 of the Provincial WUP Guidelines. The PAG was comprised of 19 community members. The following organizations had members on the PAG for the duration of the planning process:

- Catalyst Pulp & Paper
- City of Duncan
- Cowichan Lake and River Stewardship Society (CLRSS)
- Cowichan Tribes
- Cowichan Valley Regional District (CVRD)
- Cowichan Valley Naturalists Society
- Cowichan Watershed Board
- Department of Fisheries and Oceans Canada (DFO)
- FLNRORD (Water Authorizations)
- FLNRORD (Fisheries)
- Lake Cowichan First Nation

- Municipality of North Cowichan
- Town of Lake Cowichan
- TimberWest”

The statement in the text above the list, claims that recreation was an interest group represented in PAG membership. This is clearly self-contradictory, as evidenced in the list of organizations immediately following the text. In fairness to PAG, we wonder if the provincial WUP guidelines mentions recreation.

Appendix D – p.1

“Public Advisory Group (Individual Members)

Aaron Hamilton, (Lake Cowichan First Nation)
 Carol Milo, (Cowichan Valley Naturalists Society)
 Cheri Ayers, (Member of public / farmer and consultant)
 Clay Reitsma, Shaun Chadburn1, (North Cowichan)
 Dale Desrochers, Wilf Luedke, (Fisheries and Oceans Canada - DFO)
 Darryl Slater, David Robinson, (MFLNRO - Water Authorizations)
 Graham Kissack, (Catalyst Paper)
 Greg Allen, Member of public / lakefront property owner
 Joe Allen, Member of public
 Kate Miller, Brian Carruthers, Cowichan Valley Regional District (CVRD)
 Larry George, Eamon Gaunt, Melissa Tokarek, Cowichan Tribes
 Leroy Van Wieren, Parker Jefferson, Cowichan Lake and River Stewardship Society
 Michelle Geneau, Emmet McCusker, Danica Rice, City of Duncan
 Michelle Mahovlich, Edelweis Chalets Strata / lakefront property owner
 Mike McCulloch, Jaro Szczot, MFLNRO (Fisheries)
 Nagi Rizk, Joe Fernandez, Town of Lake Cowichan
 Pam Jorgenson, TimberWest
 Paul Slade, Member of public / local business owner
 Tom Rutherford, Cowichan Watershed Board”

While some of the members named on the list may be recreationists, none are known to be whitewater boaters. NO members on this list are designated as specifically representing recreational river use.

p.18 “The first step of the community planning process was to identify and scope possible interests and issues for the Cowichan WUP process with a focus on water use related to potential changes in lake levels on Cowichan Lake and potential changes in flows down the Cowichan River. The PAG explored and considered the full range of potential water use effects in developing a list of issues and interests, which was updated and refined throughout the planning process...

This preliminary list was added to through consultations with the Steering Committee and Partner Organizations, based on input received during the Public Information Meeting held in October 2017, and in initial conversations with PAG members prior to the first PAG Meeting. The initial issues list was organized according to the following topic areas:

- Culture and Heritage
- Environment – Cowichan River
- Environment – Cowichan Lake
- Flooding, Inundation and Lakefront Properties
- Industry and Commercial
- Municipal Water Supply
- Tourism and Recreation
- Water Management

The list of potential issues was then screened to identify those that were in scope for the Cowichan WUP. This included interests that may be affected as a result of proposed changes to minimum flow requirements to the Cowichan River, the existing rule curve (and water levels) for Cowichan Lake, and water storage capacity of Cowichan Lake (e.g., weir modifications.)”

Tourism and recreation are two completely different topic areas, and it appears to be inappropriate to list them in the same bullet point. Tourism issues are not our concern, but recreational issues (particularly with respect to river flows) clearly seems to be not identified and scoped to any significant degree within the report.

p.19-20 “Objectives and Performance Measures (PMs)

From the list of water use issues considered in scope for the Cowichan WUP, a set of decision objectives were developed and used to compare the effects of different water use alternatives. Issues were further sorted into sub-areas under each of the objective categories (e.g. “Environment (Cowichan River)” as an objective, “Fish Passage” as a sub-objective). Table 1 summarizes the eight high level objectives and 30 sub-objectives that were identified through the PAG process as having the potential to be affected by different water use alternatives and that were evaluated through the PAG process.

PM3 (Boating and tubing – river) represents an interest in maintaining suitable river flows to support water-based recreation down the river. (i.e., tubing and boating).

PM3a and PM3b: River boating days was developed as a draft PM to calculate and report on the average number of days the year when river flows impact the use of small boat use on the river (kayak, canoe, drift boats). The PM used a minimum river flow of 7cms based on original suggestion by the consulting team. Further investigation into specific flows for small boat use found that the 5cms threshold used for recreation tubing activities

PM3a was appropriate for all river boating recreation activities, based on the following:

In a presentation to the Cowichan Watershed Board by representatives of the Recreational Canoeing Association of BC and Vancouver Island Whitewater Paddling Society, 10 cms was indicated as the minimum river flow preferred by the paddling community, however the river has

been paddled as low as 3.5 cms; above 120 cms, paddling is less safe or enjoyable due to strong currents, washed/flooded out rapids, and hazards (Bryan and Duggan, 2017).

A drift boater on the river identified that the low flow cut-off for drift boats is 10 cms (Joe Saysell, personal communication, April 23 2018), however it was relayed that preferred flows are driven by flows for fish and that very rarely is this activity done for reasons other than fishing, and as such is covered by the environmental PMs.”

River recreationists gratefully acknowledge the inclusion of this performance measure (PM.) Within broad terms, the underlying information is valid, though rudimentary and over-simplified with respect to the nature of our activities.

The communication from Joe Saysell affirms our stance that whitewater boating is completely different from drift boating, and the two should not have been combined into one PM.

Unfortunately, the source of the information on whitewater boating came from an informal presentation made to the CWB, in July, 2017. It was intended only to comprise rough approximations, rather than significantly accurate data. Its inclusion in a formal science-based work such as the Cowichan Water Use Plan is inappropriate.

Further, the presenters, “Bryan and Duggan”, were not consulted about the use of their presented information, nor were they invited to participate in the PAG process.

PM3a and PM3b, as stated in the report, significantly over-simplify the nature of the whitewater boating experience vis-à-vis Cowichan River levels. And these PMs certainly don’t anticipate opportunities to enhance recreational value which may occur if plans are enacted to improve storage and releases in the weir replacement!

Again, looking at the list of participating “interest groups on PAG” (p.7), there is significant bias. PAG includes two community groups representing stewardship / naturalist interests, yet from three long-established and well-known paddlesport clubs regularly active on the Cowichan River, none were included.

Among the Federal or Provincial Ministries represented, we note one from DFO and two from FLNRORD. None from Health, Education or any other socially-related ministries which align more appropriately with recreation.

PAG’s narrow range of participants indicates a narrow range of thinking - strong biases that prevent a wider and more enlightened view of the potential benefits that could be attained through modifying the river and its flows.

In summary, the PAG chooses to reinforce the precedent set by the CBWMP to disregard the values and needs of river recreation when establishing river management plans. Once again, the view is narrow, and fails to recognize the value of diversity in the river management process