



# Cowichan Watershed Board

May 30, 2025

Brian Smart, RPF  
Econ Consulting Ltd.  
2-8268 Island Hwy  
Black Creek, BC V9J 1H6

Re: New Forest Stewardship Plan for Community Forest Agreement K1K

Dear Brian Smart,

Thank-you for inviting the Cowichan Watershed Board (CWB) to provide comments on the draft Forest Stewardship Plan (FSP) for Community Forest Agreement K1K. The CWB has a long history of working with our partners in the community on projects that are aimed at improving overall watershed health. In particular, we have established targets that guide our work to improve fish habitat, water quality, water flows, riparian habitat, and estuarine health. Other targets promote wise water use and community understanding of their inter-connected relationship with the natural elements of the watershed. To support this work, we have prepared two comments on the draft FSP.

## **1. Protection of cold-water refuges**

As you may be aware, a catastrophic fish mortality event occurred in the Cowichan River in 2023, and an estimated 84,000 steelhead fry and an unknown number of coho juveniles and adult trout were lost along a 10 km stretch of the river due to poor water quality (i.e., high water temperatures and high nutrient levels). With the goal of ensuring this did not happen again, in 2024 the CWB and our partners took steps to conduct in depth monitoring to inform response actions to mitigate poor water quality. While we were successful at avoiding fish mortality in 2024, it is clear this work must continue at least until a new weir is constructed as climate change is a big factor in this situation.

As part of this work in 2024 and continuing forward, we completed preliminary work to identify important cold water refugia along the river. We established there are at least 14 cold water sites along the river that are important fish habitat. One of these sites is Gleadle Creek which falls within the Community Forest Agreement area. While the lower reaches are well protected by riparian buffers and a wildlife habitat area, we do not yet have sufficient information to determine how forest management may affect the sustainment of cold water flows.

**For this reason, we are requesting the opportunity to meet and share information prior to any operational planning in the Gleadle Creek sub-watershed.** This will allow us to work together to ensure best actions are being taken to protect fish habitat in the Cowichan River watershed.

## 2. Marbled Murrelet habitat

We appreciate that in addition to the legally established wildlife habitat area (WHA) to protect marbled murrelet populations, additional habitat has been voluntarily set aside to further protect their survival. (As a note of interest, in recent years a marbled murrelet chick was observed nearby on the opposite side of the river.)

While the general wildlife measures prohibit road building and harvesting within the WHA, **we also request that a timing window (late April to early September<sup>1</sup>) be applied to any harvesting or road building outside the perimeter of the WHA in order to reduce disturbance to breeding birds.**

Thank-you again for the invitation to provide comments. Please let us know if you require further information from us.

Respectfully,

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Chief Cindy Daniels

Co-Chair Cowichan Watershed Board  
Chief, Cowichan Tribes  
5760 Allenby Rd, Duncan, BC V9L 5J1

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Chair Kate Segall

Co-Chair Cowichan Watershed Board  
Chair, Cowichan Valley Regional District  
175 Ingram Street, Duncan, BC V9L 1N8

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<sup>1</sup> The Species Account suggests a breeding window of late April to early September. See: [https://www.env.gov.bc.ca/wld/frpa/iwms/documents/Birds/b\\_marbledmurrelet.pdf](https://www.env.gov.bc.ca/wld/frpa/iwms/documents/Birds/b_marbledmurrelet.pdf)