Watershed Ecological Services Ltd. #11-2353 Harbour Road

Sidney BC, V8L 3X8 250-888-2191



June 13, 2025.

To: Islands Trust, North Office Staff & Biologist.

Re: Welsh GSH/NBSP Project, Lots 83 & 84 at 83 and 84 Blue Heron Rd., Thetis Island, BC - RPBio approval sign off for a NBSP project in the foreshore areas of these adjoining properties as part of a Thetis LTC bylaw amendment process.

As the RPBio associate working with Doug Fenton and FAEC on this project since 2023, I have reviewed the following documents pertinent to the project:

FAEC (Fenton & Associates Environmental Consulting) MSAR, Mar. 2024;
FAEC NFPPP (Native Foreshore Plant Planting Plan), May 2025;
NHC (Northwest Hydraulic Consultants) DBR (Design Basis Report), Oct 2024[.]
"Draft_CEMP_Welsh GSH project_Lots 83n84_2024n26_live draft.FAEC.May292025"

The NHC – Nature Based Shoreline Protection design to be installed into the foreshore and at the 'natural boundary' intends to support the failing bank while protecting beach habitat and infrastructure, including buildings. This design has been enhanced by FAEC and their associates by augmenting NHC's 'inert materials design' with Green Shores principles using living material to re-connect the shoreline to the upland properties.

The Draft CEMP will evolve as a 'living' document as the project moves through the subsequent regulatory steps and a contractor is hired. This concept is regularly used in Restoration Practice as it allows for the best environmental outcomes as the project moves through overall approval process. It is understood that all applicable laws and statutes and will adhered to and the site monitored during and after the project for several years.

I understand that this project is going through the NBSP expedited permit with the province (Crown Lands), DFO, and TC (Transport Canada). They will have their own questions/comments/ concerns which will be shared with Islands Trust staff as they are responded to.

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The Welsh Shoreline Project is an excellent example of the application of Green Shores to historical problems at the natural boundary. In my decades of experience with similar shoreline issues, the vast majority of the responses have been 'hard armouring'. Although always designed as 'landward' of the natural boundary, in many cases these structures have 'crept' seaward during construction, with no penalty or redress. Partially this has to do with cost – a seawall/boulder stack is generally less expensive; and expediency - quicker to install. But seawalls have been proven to be temporary, unsightly and pejorative to marine ecology, including interrupting beach sediment recruitment, refractive energy erosion, impairment of important riparian habitat contributions to ecology such as bank stabilization, shading for forage fish and contribution of terrestrial insects to foraging juvenile salmon, etc.

Given the above, it is my personal and professional opinion that the Islands Trust not only embrace this project by amending your its site specific bylaw. In doing so, it will provide an environmentally responsible example to Islands' residents of how similar issues throughout the Gulf Islands should be addressed. Alternatively, you could consider reducing barriers for others by introducing this approach as an Islands Trustwide bylaw for all to consider.

Please get in touch with the undersigned if you have any questions or concerns.

Respectfully,

Ian Douglas Bruce, R.P.Bio.#496, QEP

Dip. Restoration of Natural Systems

President, Watershed Ecological Services Ltd.

APPLIE Ian D. Bruce R.P. Blo #496