Sent: Tuesday, July 9, 2019 9:23 PM To: gbltcwebmail <<u>gbltcwebmail@islandstrust.bc.ca</u>> Subject: Contact Form Submission

Contact: Gabriola Island Local Trust Committee **Name:** Nick Doe

Email:

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Write your message: July 9. 2019 Gabriola Island Local Trust Committee Re: Development of an Ecological Protection Zone Dear LTC members I have the following comments on the Staff Report dated July 11, 2019 and, in particular Attachment 2, Ecological Protection (EP) zone. Most of these comments pertain to the Coats Marsh Regional Park and the additional park land to the east of it (Coats Marsh East) which has been temporarily designated by the RDN as being part of the 707 Community Park pending a review of the 707 CP Management Plan in 2020. The report has generated some confusion in my mind as to its purpose, some of which is undoubtedly a result of my lack of detailed knowledge of the Island's OCP and its attendant LUBs. My perspective is that of one who has a keen interest in conservation in general, and in Coats Marsh RP in particular whose wildlife, ecology, and hydrogeology I have studied in detail with frequent visits in all seasons for almost a decade. It was the hope of myself and other like-minded persons that the Islands Trust would add to the Parks zones (GI LUB 177 - Schedule A, July 9, 2018) an ecological zone designated P4. The creation of this zone would be in recognition of the fact that none of the existing three zones allow for a list of permitted principal uses that unequivocally excludes almost all human activity in the interests of protecting sensitive wildlife habitat.1 One of the weaknesses of the Islands Trust planning process for environmentally sensitive areas is that it often relies for information on the Islands Trust Sensitive Ecosystems Mapping (SEM) system, which is based solely on aerial photographs, is now out-of-date, and lacks any reference to the disproportionately important small riparian areas in, for example, Coats Marsh East. It has become of very limited value as a planning tool. What the report appears to suggest however is that its purpose is to enable the re-zoning of Coats Marsh RP in such a way that it conforms with the current RDN 2011–2021 Management Plan. The two objections to this are (a) that plan is obsolete and is now due to be revised in 2020 concurrently with revision of the 707 CP, and (b) simply duplicating the Management Plan is unnecessary and will rapidly lead to situations where it and the EP zoning disagree. We can already see this happening in that the draft EP zone document refers to buildings within the EP zone when the RDN have already demolished all buildings within the RP, as is appropriate for an environmentally sensitive area. Why not simply zone the Coats Marsh RP as a P1 zone and leave the detailed planning to the RDN requiring only that the environmentally-friendly goal for the park-ensuring the long-term development of healthy forest and wetland ecosystems by minimizing recreational impact; and discouraging access to sensitive areas easily disturbed by human presence—be retained when the plan is revised. One of the weaknesses of the RDN Management Plan 2011–2021 was that it was based on observations by consultants who made two one-day visits to the area in mid-winter in 2010. They thereby completely missed learning of the wildlife population of the lake during the breeding season, the wing moult period that leaves them flightless, and the spring and fall migratory seasons when the birds need to be able to rest. Only three swan, goose, and duck species were identified by the consultants whereas year-round observations have shown that the shallow-water wetland (the 'lake') is used by at least fifteen such species, and implementing

some of the goals in the current plan would impact them severely. One of the positives of the subject Staff Report is recognition that the Coats Marsh East additional parkland, which includes the eastern shore of the lake and is an integral part of the Coats Marsh ecosystem, needs separate zoning from the existing 707 CP. I would like to see it as a new CP. Footnote 1: Reference letter to the LTC dated July 6, 2016 from Deborah Ferens, Re: GB-RZ-2016.1 Application to Redesignate and Rezone Lands to Facilitate Density Transfer and Parkland Donation. Thank you for your attention Nick Doe (signed) 1787 El Verano Drive Gabriola, VOR 1X6