

Nick Doe

April 6, 2023

Gabriola Island Local Trust Committee
Peter Luckham, Tobi Elliott, Susan Yates

Dear trustees

Ecological Protection Zone Project

While welcoming the renewed interest of the Islands Trust's Gabriola Local Trust Committee (LTC) in adding an Ecological Protection Zone (EPZ) to their tool kit of land-use byelaws (LUBs), I am disappointed that the reported alteration to the proposed LUB 313 is to include a definition of what is allowed under the provision for "passive recreation" that I strongly disagree with.

Is not the concept of an "ecological reserve" to give as near-absolute priority as is feasible, to the conservation of the natural ecosystem within it? The definition of an EPZ should NOT start with the needs of humans for "recreation" as if the EPZ were just another kind of park.

Allowing for "...a high degree of interaction with the natural environment with minimal impact..." is a near-impossible objective despite being commonly applied to most non-active parks. And it may not be at all applicable to some park areas considered to be eligible for being zoned as an EPZ including those in a Provincial and Regional Park (P1) when practically any form of interaction may be harmful.

If the intent is to add the EPZ as an additional item (P4) in the OCP Section D.4 (Recreational and Institutional) LUB 177, then this must in my view be accompanied by a re-naming of Section D.4 to something along the lines of (Recreational, Institutional, and Ecological Reserves) and this in turn will require an extensive re-write of Section D.4 given the existing document structure (a Section D.4.4 already being used, and it contains no provision for split-zoning for example).

Failing to do so, will in my view, be a failure to confront the difference between a park dedicated to human recreation and a "park" dedicated to minimal impact of humans on the ecosystem. A new P4 section will also need to be amenable to adding sub-sections to cover site-specific exceptions, additions, clarifications, and accommodations. A blanket definition applicable to all EPZs will either be too restrictive or too weak.

As one example, consider the provision of trails. Trails have a negative impact on the environment by creating wildlife disturbance; allowing for the introduction of non-native "weed" species; allowing access by dogs (commonly banned in ecological reserves); enabling illegal harvesting; facilitating dumping; and facilitating the release of unwanted and invasive

exotic pets, a concern particularly for the introduction of exotic fish into the island's streams and wetlands.

While such impacts can be minimised by regulation and doing everything to keep human traffic on trails light, there may be a need in some areas being considered for EPZing to be made completely devoid of any public access.

The definition of "non-motorized" recreation lacks a definition of all the human activities that may in some sites be very harmful to the natural environment. Dog-walking; bicycling; large group hiking; events; actively encouraging human traffic on trails including advertising the EPZ as a "tourist attraction; boating; fishing, flying drones; providing viewpoints to be used particularly during the breeding season; trimming natural vegetation with the sole intent of keeping it "tidy"; hunting; feeding wildlife; engaging in scientific studies that have little bearing on site-specific concerns; needlessly altering drainage patterns and interfering with beaver activity as is currently underway in the Coats Marsh RP; providing boardwalks other than those needed to mitigate flooding on well-established trails; and so on.

I would urge a complete re-working of the definition starting from the presumption that all human activities within an EPZ are potentially harmful, and that compromise between conflicts between humans and nature should be decided in nature's favour. The rewrite should include recognition that the island is too small to support an active nature conservation lobby group with no conflicting mandate to encourage "passive recreation"; and that Indigenous people may have much-needed ideas on how to accomplish a balance between the ever-expanding human population, which precludes a return to the past, and the natural environment.

The Coats Marsh Regional Park, a prime candidate for EPZing, has a current Management Plan that makes it clear that the community envisaged more than a decade ago that this so-called "park" be a "nature reserve", but pro-anthropological focussed regulation has led to it being managed, until recently, as an extension of the 707 CP. Let's not the same watering-down of an intended mandate happen to other potential EPZ reserves. For these reasons my preference would be to add an entirely new section D6 to the OCP thereby emphasizing the difference between some people's understanding of a park and an EPZ.

Sincerely:

Nick Doe (signed)