

From: Patricia Woodruff <pwoodruff@islandstrust.bc.ca>

Sent: Tuesday, December 9, 2025 11:48 AM

To: Erin O'Brien <[REDACTED]>

Cc: Brad Smith <bsmith@islandstrust.bc.ca>; Emily Bryant <ebryant@islandstrust.bc.ca>

Subject: NP-PLRZ20240110 Response to Pender Conservancy

Hello Erin,

The latest decision at the North Pender Local Trust Committee (LTC) was for a rezoning bylaw to be drafted. The actual rezoning has not yet been approved and there will be opportunities to make submissions to the local trust committee.

The area identified for rezoning, as supported by the Official Community Plan (OCP), is for a small southern portion of the lot that is already significantly altered from both historic and current industrial activity. This portion of the lot does not include any sensitive ecosystems, ecosystems at risk or identified potential sharp-tailed snake habitat.

Other than a proposal for development of a workshop within the gravel yard, there has not been a proposal submitted for any increase in the existing footprint or change in use of the area currently being used commercially or industrially.

The existing use of the site has occurred since 2011 and other industrial activity has occurred at the site since the 1970s; development is generally encouraged in areas of anthropogenic disturbance with little possibility for restoration.

My understanding from listening to the North Pender LTC meeting on November 21 is that there are no suitable alternative sites readily available. Regardless, the LTC is being asked to consider the application in front of them, which is for this site.

The ecosystems at risk/sensitive ecosystems in the Rural portion of the site have been highlighted as an area for protection in any future development proposals, in part due to the importance of connectivity between the different protected areas to the north of the site. There is a Development Permit Area (DPA) designated on the northern portion of the lot, which would manage any future development within that sensitive area.

New information on the presence of species at risk should be provided to the BC Conservation Data Centre to be included in future reports for this area.

In order to better incorporate your concerns into the future decision by Trustees, please provide any data or population trends that show a negative impact from the existing industrial activity at 3334 Port Washington Road to species and ecosystems at risk on the adjacent sites.

Please ensure that any comments or statements made on the ability, work or conduct of a Registered Professional Biologist are supported under the College of Applied Biology's Code of Ethics and Professional Conduct.

Please let us know if you have any questions or require further information.

Thanks very much,

Patricia

Patricia Woodruff, RPBio

Biologist

Islands Trust

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You can also reach us toll-free via Service BC 1-800-663-7867 | 604-660-2421

Protecting islands in the Salish Sea

I am humbly thankful to live and work in the treaty lands and territories of the BOKÉĆEN, K'ómoks, Lək'wəḡən, Lyackson, MÁLEXEL, Qualicum, Quw'utsun Tribes, scəwəḡən məsteyəxʷ, Scia'new, səliłwətaʔ, SEMYOME, shishálh, Skwxwú7mesh, Snaw-naw-as, Snuneymuxw, Spune'luxutth, SÁÁUTW, Stz'uminus, ʔaʔəmen, toq qaymuxʷ, Ts'uubaa-asatx, Wei Wai Kum, We Wai Kai, WJOLÉLP, WSIKEM, Xeláłtxw, Xwémalhkwxw/ʔop qaymuxʷ, and xʷməḡkʷəy̓əm.

From: Erin O'Brien <[REDACTED]>

Sent: Sunday, November 23, 2025 11:24 AM

To: Patricia Woodruff <pwoodruff@islandstrust.bc.ca>

Cc: Deb Morrison <dmorrison@islandstrust.bc.ca>; Aaron Campbell <acampbell@islandstrust.bc.ca>; David Maude <dmaude@islandstrust.bc.ca>

Subject: Fwd: Question for Conservancies re: locally important species

Hello Patricia,

The Pender Islands Conservancy recently offered to provide SAR and other inventory data to the QEP conducting the assessment that supported rezoning application NP-PLR20240110 (Bigham) on North Pender Island; however, the QEP did not request this information or incorporate any meaningful assessment of impacts on adjacent ecosystems (despite Trustees' resolution that required them to do so). The Trust's in-house R.P.Bio. then approved the report without questioning this lack of documentation of adjacent species occurrences (particularly SAR), and Trustees similarly did not question the fact that their own requirement for the assessment was not met.

This response by Trust staff and Trustees has set a precedent for an extremely low standard for approval of industrial land use adjacent to provincially red-listed ecosystems, as well as documented presence of SAR. Hence, it does not appear that ecosystem inventory data are valued or in any way considered necessary for QEPs or the Trust, even for permitting high-impact land uses to proceed (let alone lower-impact developments), and so it no longer seems like a good use of our limited resources to work with the Islands Trust in providing these data. Local land trusts like ourselves work extremely hard to secure funding to conduct rigorous inventories and research on our Nature Reserve lands, and we see little reason to share these hard-won data in good faith, only to have them ignored and projects approved without meaningful consideration of likely impacts to adjacent sensitive ecosystems. Certainly on North Pender Island, at least, a concern for scientific rigour or evidence is clearly absent from land use decisions.

Best wishes,

Erin O'Brien

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Dr. Erin O'Brien

Ecology and Development Director

Pender Islands Conservancy