

From: Phillip Rees
Sent: Tuesday, August 25, 2026 3:50 PM
To: SSIInfo
Subject: Re: LTC Meeting 2026-08-27 - Deny PLDVP20250460 and PLDP20250452 submitted by Serena Klaver for 434 Baker Road, SSI (PID: 009-555-781)

Dear Trustees,

I've lived on Salt Spring Island for the past sixteen years. Salt Spring is now my home. It's the only home my children have known.

I am disappointed to see this flawed application coming round again after the previous more meretricious approach was denied by staff, denied by the LTC and denied in court. This application has no merit for the simple reason that coastal erosion will not be a threat to the upland structures of the property in this century or the next. However, the proposed revetment would be a threat to the stability of the beach ecosystem, would set a precedent for unnecessary and ecologically harmful developments on other properties and would impact the amenity of the beach for islanders and visitors alike.

In the consultation for the previous Crown Land Tenure Application connected with the denied "Green Shoring" approach it was noted by Aurora Professional Group that the rate of erosion for coastal shale cliffs is around 1cm per year.

See: <https://comment.nrs.gov.bc.ca/api/public/document/68361f6e1c9fc600221446bd/download>

"The rate of erosion for marine-exposed cliffs has been reviewed within published scientific literature, with an order of magnitude rate of erosion for shale being 10-2m/year, as reported by Sunamura, T. (2005) in Cliffs, Lithology Versus Erosion Rates. In: Schwartz, M.L. (eds) Encyclopedia of Coastal Science. Encyclopedia of Earth Science Series. Springer, Dordrecht. https://doi.org/10.1007/1-4020-3880-1_72."

The CRD Regional map shows that the structures on the 434 Baker Road parcel are roughly 20m from the cliff edge. If the rate of erosion is constant it would take two millennia for the cliff edge to reach the structures on the property. Putting this another way, given the expected lifetime of the structures is 75 years, by the time the structures have reached end of life the cliff edge will have moved inland by 75 cm and the structures will still be over 19m from the cliff edge.

If due to climate change or other factors the rate of erosion quadruples to 4cm per year then in 75 years when the structures on the property are at their end of life the cliff will have eroded by 3m. This is about the width needed for the proposed revetment. If the property line is frozen at its current position, and the Crown does not claim the eroded foreshore, the owner's decedents would be in a position to propose a revetment at sea level without encroaching on the current beach area and protect the remains of the then dilapidated property.

The erosion rates mentioned above are textbook estimates. The actual erosion rate has not been measured despite the property owner being advised to do so multiple times. The reports submitted with this application are rehashed versions of reports commissioned for the previous failed application with no additional fieldwork which meant that no comparison could be made between the condition of the cliff as it is now and the condition it was in when the "Green Shoring" proposal was made.

Erosion monitoring has been recommended repeatedly. E.g.:

"As part of any foreshore works, property owners should consider a cliff edge monitoring program to document the rate of retreat and to provide a better planning metric."

- Harper J. Baker Rd Properties Project, Beach Observations, 27 March 2023

Improvements in technology and particularly in computing power means that non-destructive sensing

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techniques can be used to accurately measure actual erosion rates. LiDAR was invented in the 1930s but it's only with increases in computing power that costs of analysis of LiDAR data has dropped to the point where it is becoming practical and cost effective for smaller projects. This technique can be used to map cliff faces even when they are covered in vegetation as the light penetrates through the leaf canopy. Shoreline protection projects can establish that there is a genuine medium term need by repeating surveys over multiple years and calculating differences in point cloud data. The owner of 434 Baker Road should be familiar with this technology as it works on the same principle as the 3D scanner in the FabLab he funded.

LiDAR has been used on Salt Spring to map trees on the island as part of a Raincoast Conservation Foundation project (<https://www.raincoast.org/2020/09/big-tree-hunting-on-salt-spring-island/>). The Islands Trust may want to look at lessons learned from that project and evaluate the costs and benefits of commissioning a repeated LiDAR surveys of our coasts to provide base data for planning decisions in the same way that Archipelago Marine collects photographic and video records for the entire BC coast in its ShoreZone project (<https://shorezone.org/shorezone-maps/bc-shorezone-map/>). In the absence of an Islands Trust survey individual property owners may choose to use local drone mapping providers.

ShoreZone classifies wave exposure along Baker Beach as “protected”. The applicant’s property is among the most naturally protected on Baker Beach due to the presence of offshore reefs. These reduce the energy of waves which diffract around the reefs producing an interference pattern that results in the waves dropping sediment. In many places around the world this mechanism produces tombolo structures, curved deposits of sediments connecting the shore to rocks and islands. Satellite imagery shows this clearly.

Erosion nourishes beaches. The revetment at 241 Quarry Drive, for which I could not find an authorization, reduced sediment supply in the area. A neighbouring revetment at 434 Baker Road would reduce supply further. This is likely to have an impact on deposition around the reefs starving them sediment and disrupting the entire reef environment. In addition to the reduction in sediment supply this hard armouring approach would increase wave reflection which in turn would increase turbidity and disrupt existing sediments. These processes could have an impact on aquaculture in the area, the applicant has not modelled them.

The section of Baker Beach in front of the applicant’s property is part of a popular hiking loop (<https://www.crd.ca/parks-recreation/find-park-or-trail/baker-ridge-trail>). The construction of the 2.5m wide revetment would make this portion of the trail inaccessible for longer periods around high tide. 2.5m is enough space for a couple to walk hand in hand along the beach while being passed by someone coming the other way with no-one getting their feet wet. Given that the structures are safe and that the revetment would block the coastal path at high tide it is possible that a subconscious motivation for the application is the hedonic value of exclusivity described by Boto-García and Leoni in their paper The Economic Value of Coastal Amenities: Evidence from Beach Capitalization Effects in Peer-to-Peer Markets.

I’d like to end with an observation that the next few decades are going to give us an indication of whether we’re going to be able to turn the tide on climate change. If we aren’t we’ll at least be better informed about how robust our defenses need to be or how far we need to retreat. As one of Ethan’s consultants said in his report.

“While these strategies will likely provide a reduction in cliff erosion over a decade or two, the accelerating rise in sea level will eventually re-activate the cliff erosion without ongoing mitigation. Longer term strategies should also consider retreat of infrastructure from the cliff edge.”
- Harper J. Baker Rd Properties Project, Beach Observations, 27 March 2023

Although Harper’s report was deleted from Ethan Wilding’s Baker Beach Shoreline Project website (bakerbeach.ca) as part of the site redesign on Feb 24th it can still be viewed along with other deleted reports in the commit history of the GitHub repository used to generate the site. A direct link to the relevant part of the commit history is:

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<https://github.com/featheredape/bakerbeach/tree/c2c6f93680336e5fc44e0242187ffabd1f7dee67/docs>

Supporters of this application may want to read those reports so as to fully inform their opinions.

To summarize. The structures at 434 Baker Road are not under immanent threat, Ethan Wilding's descendants have centuries to plan what protective actions are actually needed. Constructing the revetment today will threaten sensitive ecosystems and would be making an uninformed decision when the technology is available to make an informed one. The revetment would reduce the amenity for islanders and visitors. These dis-benefits to islanders, visitors and the environment would be exacerbated by further applications that take advantage of the precedent set.

In Wilding v Salt Spring Island Local Trust Committee, 2026 BCSC 88 (CanLII) the Trust ended up having to pay its own costs because of delays. Those expenses will have been passed on to property tax payers. Don't let that happen again. Don't defer this application, deny it.

Thank you.

- Phil Rees

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