

Islands Trust, Salt Spring Office
500 Lower Ganges Road
Salt Spring Island, BC V8K2N8
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August 26, 2019

Re: Proposed Bylaw Variances for Swanson's Pond (Lot 10 Park Drive)

Dear Islands Trust,

Thank you for your work to preserve and protect our islands' unique ecosystems and align development with the Official Community Plan. We really appreciate your long-term perspective in safe-guarding this unique environment and healthy community.

We would like to express our concerns regarding the bylaw variance requests made by Eric Booth for the lot known as Swanson's Pond, located adjacent to the Gulf Islands Secondary School on a three-acre residentially-zoned property between Kanaka Road and Park Drive. The proposed construction of 48 apartment units at this location is unsustainable. Proposed three-storey buildings at this site are out of character for the neighbourhood and Ganges as a whole. And, dependence on well water for servicing so many homes at this site is a bad idea.

Firstly, 48 units would more than double the number of residences in the immediate area. Since 2016, the Park-Kanaka neighbourhood has organised seasonal potlucks and parties and our entire contact list for the residences surrounding Swanson's Pond property on East Park Drive, Aldous, Kanaka, and Lakeview Crescent comprises 38 households. Ten homes on the Swanson's Pond property is more in alignment with existing density and the Official Community Plan.

Secondly, three-storey buildings on this property are not appropriate nor do they align with the Official Community Plan and neighbourhood context. The property is wetland and building such heavy buildings on this land would be a challenge, according to several contractors. There are no three-storey buildings in the immediate area. Concerns include shading natural areas and adjacent properties, impacts on view-ways, and divergence from Island character.

Third, the proposed use of well water to service 48 units at a given household size is not realistic for reasons of water quality and quantity. One neighbour recently detected arsenic and other contaminants in a nearby well. The site is also near sea level and anticipated sea level rises may cause the water to go saline. How could NSSWD refuse water to so many households when the time came? The development would be a set-up for trouble. Water quantity is also questioned, as the tests were done during a wet year and at least one neighbourhood well was not included in the impact testing. Furthermore, would this draw on the local aquifer dry up Swanson's Pond completely? Considering the future impacts of climate change, new developments require sustainable water solutions.

As you are well aware, this development has been proposed several times over the past 18 years, and each time it has been stopped by the community at large. For example in 2007, residents intervened after the stream that fed the pond was diverted, flooding downstream homes. In 2008, Salt Spring Secondary students gathered over 400 signatures to halt development. In 2009, the Salt Spring Salmon Enhancement group filed a legal claim to stop rash action at this site. Over the years, "Friends of Swanson's Pond" and other community members have organized and expressed their concerns.

Past concerns remain relevant, including the:

- Ecological importance of the site;
- Safety of school children and pedestrians, with regards to additional vehicular traffic;
- Limited water availability for new developments; and,
- Lost opportunities for greater outdoor education for adjacent schools and benefits of a public pond and wetland greenspace in town.

Swanson's Pond and surrounding wetlands and forests are an important natural space. The area was historically a wetland and shallow salmon stream, but was converted to a wet forest and pond for drainage in the early 1960's. The area still supports large numbers of Pacific Chorus Frogs, fire-bellied newts, pileated woodpeckers and kingfishers, to name just a few species. Freshwater wetlands such as these are very important for migratory birds, especially in this seasonally-dry, marine environment. Mr. Booth has [REDACTED] in terms of past pond draining, tree removal, work in riparian areas, and stream diversion, according to community members.

The safety of pedestrians and school children must also be taken into consideration. The lot is adjacent to the Gulf Islands Secondary School, which also adjoins Salt Spring Elementary and Middle Schools as well as the Cooperative Preschool. Traffic is already hectic in the mornings and afternoons with drop-offs and pick-ups, school busses, along with students walking and biking to school. Occasional speeding cars, especially on Park Drive with little or no shoulder, have nearly hit several walkers. Neighbors have noticed an increase in pedestrian activity, with active Bed & Breakfasts and people cutting through from town to access Country Grocer, the Thrift Shop, and other services on Lower Ganges Road. An additional 48 households in this area would pose serious traffic volume and traffic safety concerns.

More importantly, the unique natural wetland, forest and pond areas could serve as a wonderful outdoor classroom for the adjoining schools, as an outdoor laboratory for art and ecology, reflecting this islands' culture and values. For example, Salt Spring Elementary offers a Nature-based Program, where students spend on average half the day each day outdoors learning in natural settings. Other elementary, middle, and secondary students could greatly benefit from a wild reserve across the street for ecology, science and math projects, and to find quiet places for creating art, and reading and writing. Neighbors would welcome established trails from which to enjoy the pond views and forests. Moving forward, invasive weed removal and habitat enhancement projects would benefit western pond turtles and other fish and wildlife. In 2002, PARC considered purchasing this property for some of these uses, but didn't have the financial wherewithal at that time. Perhaps now it's time to revisit that idea.

This is not to say that the neighborhood would like the land to remain overgrown and [REDACTED]. A collective vision may be achieved. Furthermore, we do recognize the need for affordable housing on Salt Spring Island. It just shouldn't come at the cost of natural heritage and community safety.

Thank you for your consideration,

Robin Jenkinson & Brian Pyper, [REDACTED]
[REDACTED]