



Alexandra Tait, MSc, RPBio.
President, Valdes Island Conservancy

July 6, 2016

Marnie Eggen, MCIP, RPP
Islands Trust, Northern Office
700 North Road, Gabriola Island, BC, V0R 1X3
Via Email: meggen@islandstrust.bc.ca

Dear Ms. Eggen:

I am writing in my capacity of President of the Valdes Island Conservancy (“the Conservancy”) in response to the recent community meeting regarding the proposal to rezone marine waters adjacent to Valdes Island, make repairs to an existing breakwater, for the purposes of improving moorage safety of the West Vancouver Yacht Club outstation at Kendrick Island (“the project”).

INTRODUCTION

As you no doubt know, the Valdes Island Conservancy was founded in 2007, and established a mission to preserve, protect, and restore lands and waters around Valdes Island. We aim to do this through education and building awareness in our membership, working with citizen science programs to promote the importance of the ecosystems and associated wildlife, plants, and fisheries resources on and around Valdes Island. Presently, we are a 12-member volunteer Board of Directors, with seven active committees, and our membership recently passed 100 members! We are the largest recreational users of Valdes Island, and account for likely the most taxed stakeholder group on the Island. We actively work with other Conservancies, non-government organizations, and the Lyackson First Nation in various initiatives, including but not limited to our ongoing research and outreach programs associated with the Rockfish Conservation Areas around Valdes, invasive species mapping and management, annual BioBlitz events, and an annual newsletter.

The Board of Directors has reviewed the Staff Report issued by Islands Trust to the Thetis Island Local Trust Committee on March 14, 2016. Based on our understanding of the project, we have some questions and some constructive criticisms that we hope that you will consider as part of the review and consultation process, below.

CONCERNS RELATED TO THE BREAKWATER AND IMPACTS TO THE MARINE ECOSYSTEM

On June 4, 2016 members of the Conservancy completed a survey of the marine habitat west of Kendrick Island using a drop camera during an annual biological inventory event. Video was recorded of the entire survey. The drop camera route started at low tide (and slack current) off the northwest end of Kendrick Island and went in

a southeasterly direction paralleling the island roughly 30 to 50m off-shore. Depth ranged between 9m and 12m. When we got close to the dock we headed west and paralleled Valdes Island in northwesterly direction before heading into Gabriola Passage. Total time for this segment was about 33 minutes. Depth along the edge of Valdes ranged from 8m to 15m. Depth trough Gabriola Passage ranged from 12m to 22m. Total length of survey was 1805m over a period of 54 minutes.

Habitat associated with the basin between Kendrick Island and Valdes Island was found to be highly productive, which is very likely due to the proximity to Gabriola Passage and the regular tidal flushing. Most of the area had a fine layer of silt/sand with some rock outcrops. We identified thousands of small siphons (of which many were likely Tube-Dwelling Anemone's), hundreds (if not thousands) of larger siphon's (likely Horse Clams) and in the high hundreds (if not thousands) of Dungeness and Red Rock Crabs. Several thousand Macoma and Butter Clam shells were found throughout. One Starry Flounder was captured on film. Moon Jellyfish, Rock weed, Sea lettuce, Pacific Oyster, Sea hair, Sugar Kelp, Northern bladder chain, Kelp Crab, hundreds of Tube-dwelling anenomes, and few Green anenomes were also noted. With the exception of very near-shore rocky areas, none of this basin was suitable rock-fish habitat.

Entering Gabriola Passage Crabs and empty shells were common throughout. Siphons and Algae were limited in this area. Large cobble and some boulder with compact sand between dominated the substrate. Siphons and Algae were limited in this area. This area was estimated to be moderate rock fish habitat. The centre of Gabriola Passage marine habitat was primarily Urchin barrens of moderate to small sized cobble (dominated by red sea urchins). One sea pen was noted in this area. Siphons and Algae were very limited in this area. This area was estimated as being poor rock fish habitat.

The habitat in the last 150m of the survey was dominated by large rock and a steep creviced rock outcrops. One rock fish (likely a Greenling) was documented. This area was assessed as being ideal rock-fish habitat.

CONCERNS RELATED TO CONSTRUCTION AND IMPACTS TO COASTAL WATERBIRDS

Coastal waterbird surveys conducted over the last six (6) years for Bird Studies Canada by members of the Conservancy, indicate that Gabriola Pass/Kendrick Island/and the shorelines of neighbouring islets and Valdes Island are important sites for resident and migratory waterfowl and shorebirds.

The eastern shoreline of Kendrick Island has been identified as an important site for Harlequin Ducks. Harlequin Ducks are generally not found in high numbers on our coast and preferentially select sites of high wave action. In April of 2009, 83 individuals were counted; in May of 2010, 63 individuals were sighted and in December 2012, 34 individuals were recorded. Bird count data is sporadic because of the difficulty of access to the area due to sea conditions.

Shorebirds have been found to use the shores of Kendrick Island, particularly on the section jutting out into Gabriola Pass and the eastern sweep down to the islets and Valdes Island. Of note are black turnstones, surf birds and nesting oystercatchers.

The waters in the bay between Kendrick and Valdes Island are frequently inhabited during the fall and winter months with bufflehead, common merganser, and grebes. Slightly offshore, all three species of cormorants have been observed, along with large flocks of surf scoters.

Gabriola Pass itself with more active waters, are preferred sites for goldeneye and rarely are pigeon guillemots not sighted.

IMPACTS AND ADDITIONAL SITE INFORMATION

Impacts to Marine Ecology

Survey results could not see significant impacts from the existing Kendrick Island moorage facility, but follow-up surveys of the dock site where direct effects of moorage are recommended.

The Conservancy has concerns regarding the proposed breakwater, largely focused on the unknown effects that may occur with the interruption of tidal flushing in the basin area between Kendrick and Valdes Island. We expect, given the relatively small size of the proposed rock abutment, that the effects may be minimal, but this is an estimate only and given the high productivity of the area warrants further investigation.

The Conservancy is also concerned that the biologist that was commissioned to assess the area, appears to have limited his assessment to a small sub-tidal area that the rock breakwater is to be located; failed to account for impacts that could occur in the adjacent marine habitat.

Impacts to Waterbird Habitats

The Conservancy has concerns regarding the increase in human activity and construction activities necessary for the protection of waterbirds using the site. It is not clear from the proposal, what mitigations will be ensured to protect waterbird staging areas (required under the federal *Migratory Bird Convention Act*), and the protection of waterbird overwintering areas (required by the provincial *Wildlife Act* and *Wildlife Amendment Act*). Heavy machinery operation, human presence, vibrations from construction etc., all can displace birds from these critical areas.

The Conservancy does not see assurances in the protection of these habitats and their inhabitants.

Impacts to Culturally-significant Areas

The bay between Valdes and Kendrick Island shows indication of historical use by First Nations peoples as bivalve harvesting, leading to a shell midden site in the area. The change in currents and tidal influence on these ecosystem components is not well-articulated thus far in the summary of information or in available assessments.

Impacts to Protected Areas

The Conservancy has concerns related to the removal of lands from Wakes Cove Provincial Park, and the lack of environmental assessment and consultation in this process. The Conservancy requests clarification on

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whether it is the intention that these lands will revert back into Wakes Cove Provincial Park in the future, or if the lands will remain under lease by the WVYC.

CLOSING

Thank you again for contacting the Valdes Island Conservancy, and we look forward to being engaged as the project process moves forward.

Sincerely,



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