

Letters and Responses to RDN, POSAC, LTC, GaLTT, GSK, and TNT on the management of parks on Gabriola Island, BC, Canada

RDN = Regional District of Nanaimo

POSAC = Parks and Open Spaces Advisory Committee (of the RDN)

LTC = Local Trust Committee (of the Islands Trust)

GaLTT = Gabriola Lands and Trails Trust (non-profit volunteer group)

GSK = Gabriola Streamkeepers (volunteer group affiliated with GaLTT)

TNT and NTBC = The Nature Trust (of BC)

Sounder = Gabriola Sounder (weekly community newspaper)

Proposed trail along south side of the “lake” in Coats Marsh Regional Park

April 17, 2016

E-mail to Tom Osborne, RDN General Manager of Recreation and Parks

As you may or may not know I have been doing a fair bit of monitoring of Coats Marsh, Coats Marsh Creek, East Path Creek, and the NW Arm including its hydrology, water levels (beaver dam and flood control at the weir), water quality, and rainfall.

A lot of this work has involved regular access (more than once a week for almost a year now) to the marsh including to the east shore of the marsh, which is outside the park boundaries and doing this required permission from the landowner. The details of this ongoing research is posted at:

<https://nickdoe.ca/pdfs/Webp673.pdf>

<https://nickdoe.ca/pdfs/Webp673d.pdf> 2015 field notes

<https://nickdoe.ca/pdfs/Webp673e.pdf> 2016 field notes

The reason for my writing is that I was concerned to read that the RDN is planning to construct a trail in the marsh which I gather would extend from the causeway at the west end of the marsh, to the main entrance on Stanley Road. If this surmise is correct, I would be very strongly against any such trail building.

In the course of many hours spent at the marsh, I have met only a few visitors; nearly everyone of the relatively few people I do meet are locals and almost all, perhaps not quite all but close, have been walking their dogs. Given that the number of people so doing is small, that the dogs are well controlled, and that many are walking the trails outside the park boundary on the east side which are for the most part setback from the shores of the marsh, I have never seen a problem.

However, if a trail is built along the south shore, the chances are that there will be a significant increase in foot traffic and that people using this new trail will be as they have in the past be walking their dogs. This has the potential of severely reducing the area of the marsh that is available for the ducks, particularly the mallards and resident buffleheads, and other wildlife that inhabit it and that require peace and quiet. The ducks particularly are extremely sensitive to the

presence of people, a result no doubt of their being of interest to hunters. It is impossible to walk the proposed trail route without disturbing them -- I have tried it -- particularly when moving toward the lake now and then to obtain a view as most walkers will want to do.

There is also abundant evidence in the park that trails encourage the spread of invasive species and weeds. This marsh is a beautiful property and a delightful combination of nature reserve and recreational area for naturalists and nature lovers. In my view, any funds that the RDN has available would be far better spent on helping the community to acquire all of the eastern shore of the marsh, which is an integral part of the marsh's ecology. In contrast, opening the marsh up to more human and canine interference would be a regrettable step backwards and not at all in keeping with the objective of keeping this area primarily as a nature reserve.

Any hope that walking dogs be avoided by posting signs forbidding it is quite unrealistic. That's not how it works on Gabriola.

Sincerely

Nick Doe

April 27, 2016

Nick Doe

Sent via email to: nickdoe@island.net

Dear Mr. Doe:

Re: Trail Development – Coats Marsh Regional Park

Thank you for your email letter of April 17, 2016, which outlines your concerns regarding the proposed trail development in Coats Marsh Regional Park that will connect the existing trail over the berm at the north-western end of wetland to the Stanley Rd park entrance. The proposed trail route is located in the forest approximately 15-30 meters back from the high water mark of the wetland and follows along the south-western edge of the wetland. The proposed trail alignment was reviewed and supported by the ecological assessment of the property completed for the management plan (Ecological Features and Management Recommendations for Coats Marsh Regional Park, 30 December 2010), is supported by The Nature Trust, and has been approved by Environment Canada's Ecological Gift Program (EGC). Please find enclosed a copy of the proposed trail route as approved by The Nature Trust and the EGC.

The above-noted trail connection is proposed in Section 3.3.4 of the *Coats Marsh Regional Park Management Plan*. The Plan reflects the community's desire to connect the north and south ends of the park by means of a trail along the south-western side of the wetland. Your concern that the addition of this trail would increase pedestrian and canine presence near the wetland thereby negatively impacting wildlife, particularly the resident duck populations, and potentially transmitting invasive species into the Park is understood. This potential impact has been considered and in an effort to reduce habitat disturbance, the trail has been routed away from the shoreline, except where it crosses the berm at the far western edge of the wetland. As per the recommendations in the Plan, signage will be installed identifying that no dogs be

allowed in this sensitive area of the park. The Plan also recommends a viewing platform be developed on the southern end of the wetland near the Stanley Rd park entrance to provide controlled access to the edge of the wetland area for educational purposes.

Your advice regarding the specific trail route location and/or any mitigation measures would be greatly appreciated. If you are interested, please contact Elaine McCulloch, RDN Parks Planner at 250-248-4744 (ex. 656) or emcculloch@rdn.bc.ca.

Sincerely,

Wendy Marshall

Parks Manager

AH

CC: T. Osborne, General Manager of Recreation and Parks, RDN

E. McCulloch, Park Planner, RDN

J. Lobb, Parks Operations Coordinator, RDN

T. Reid, Manager, Vancouver Island Conservation Land Management Program

E-mail to [Elaine McCulloch, RDN Parks Planner](mailto:Elaine.McCulloch@rdn.bc.ca) April 27, 2016

hi Elaine

As you can imagine I am very disappointed in this response. It is I feel being made by a "bureaucratic machine" (not meant unkindly, but you know what I mean) that has no understanding of the situation or intimate knowledge of the Coats Marsh Regional Park.

The Management Plan made in 2011 needs reviewing and updating. It is out of date.

My detailed comments are attached.

Sincerely

Letter: Thank you for your email letter of April 17, 2016, which outlines your concerns regarding the proposed trail development in Coats Marsh Regional Park that will connect the existing trail over the berm at the north-western end of wetland to the Stanley Rd park entrance.

The proposed trail route is located in the forest approximately 15-30 meters back from the high water mark of the wetland and follows along the south-western edge of the wetland.

Comment: Visitors using this route will not be aware of the importance of not approaching the lake to get a better view of it. It is the natural thing to want to do. There are several opportunities along the proposed route for a closer approach to the water's edge to be made, and in my experience, this disturbs the wildlife, particularly the waterfowl. Setback helps, but does not provide the complete solution appropriate for a nature reserve.

Letter: The proposed trail alignment was reviewed and supported by the ecological assessment of the property completed for the management plan (Ecological Features and Management

Recommendations for Coats Marsh Regional Park, 30 December 2010), is supported by The Nature Trust, and has been approved by Environment Canada's Ecological Gift Program (EGC).

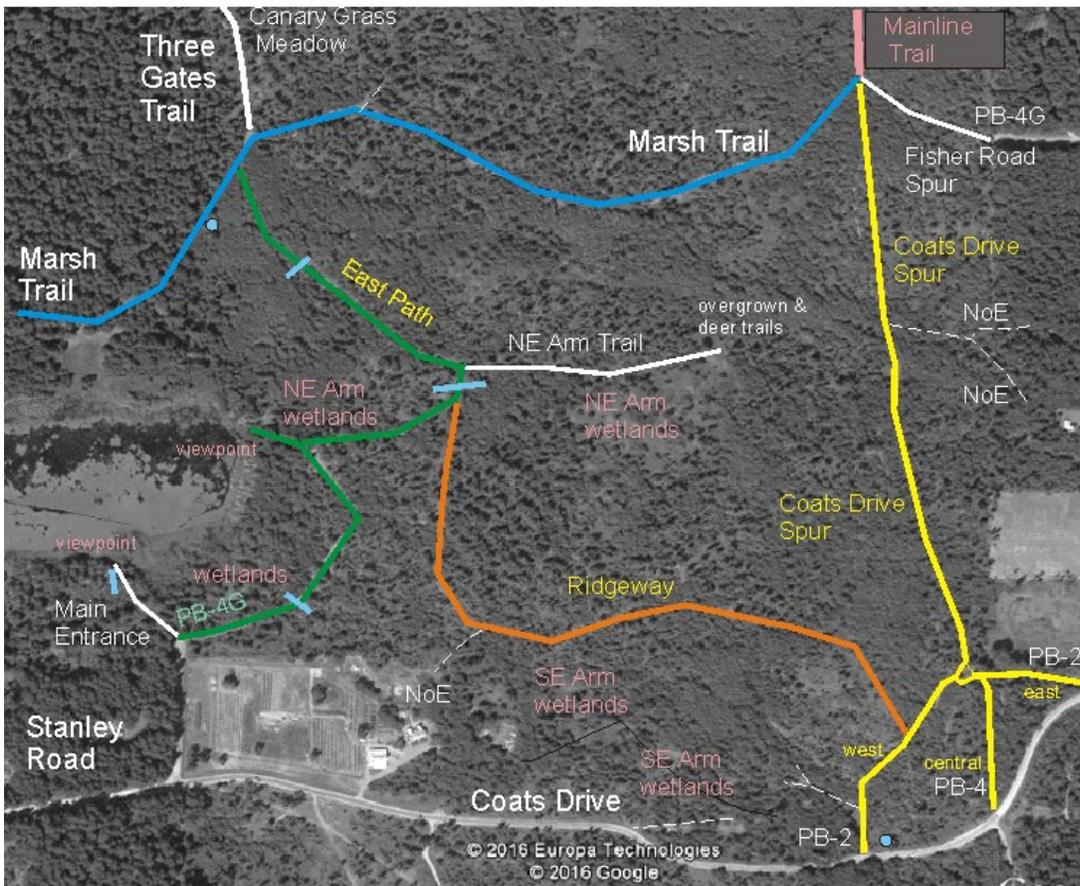
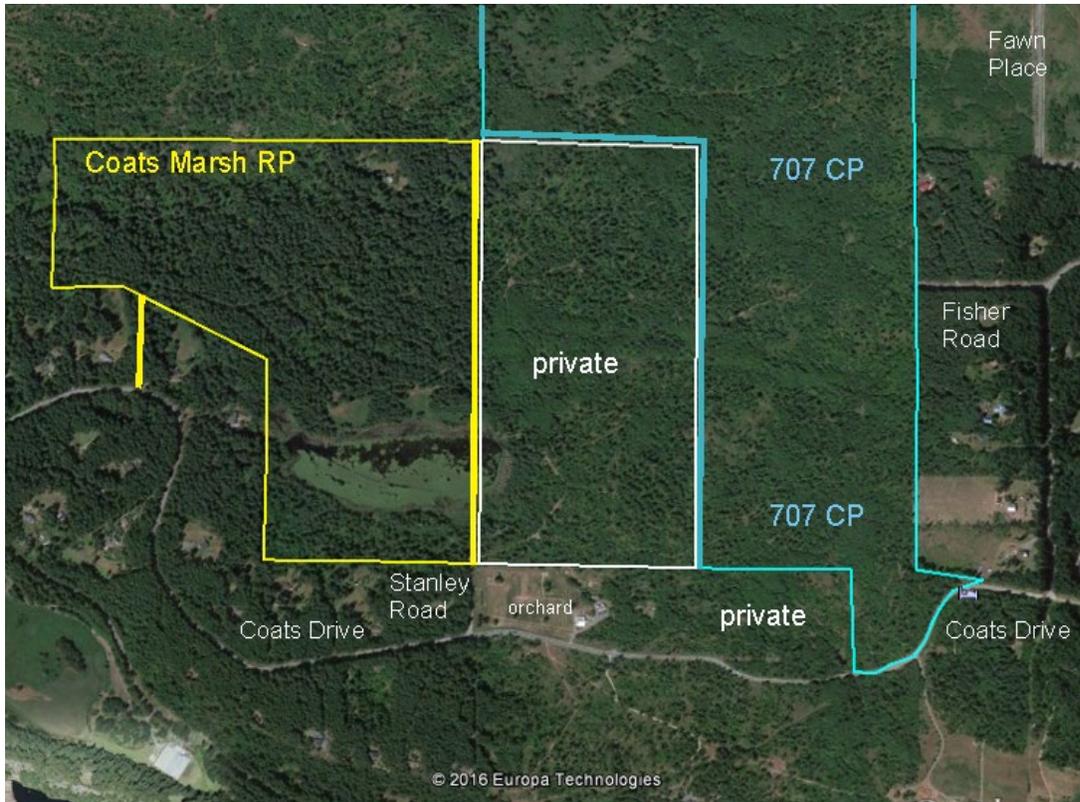
Comment: The management plan was based on incomplete information. An assessment could only be carried out over a year-long study of the hydro-geology and ecology of the lake, not a two-day visit in winter. In the past year, I have visited the park on nearly 100 occasions doing just that. The plan needs to be reviewed in the light of new information on the ecology of the lake, its hydro-geology, and the role of the beavers in controlling the water level. The value of approval by experts who have not actually been to the lake recently I would respectfully suggest is of limited value.

Letter: Please find enclosed a copy of the proposed trail route as approved by The Nature Trust and the EGC.

Comment: No copy received in the e-mail. The route is flagged. Is this the route?

Letter: The above-noted trail connection is proposed in Section 3.3.4 of the *Coats Marsh Regional Park Management Plan*. The Plan reflects the community's desire to connect the north and south ends of the park by means of a trail along the south-western side of the wetland.

Comment: This plan was formed at a time when this was the only possibility of connecting the north and south ends of the park. This is no longer the case. An application has been filed with the Islands Trust that would open up the East Path to the public officially. This path is, through the generosity of the landowner, used at present by all of the neighbours and local visitors to connect Coats Marsh RP with the 707 CP. The East Path is set back from the marsh and does not require maintenance work.



Not only would the proposed trail not be needed for conductivity if the land transfer proposal goes ahead, it would potentially negatively impact the lake by providing a route completely around the lake, leaving no shore inaccessible to people, and encouraging more use of the trail as a hiking dog-walking route rather than a trail providing access to naturalists.

Letter: Your concern that the addition of this trail would increase pedestrian and canine presence near the wetland thereby negatively impacting wildlife, particularly the resident duck populations, and potentially transmitting invasive species into the Park is understood.

Comment: I quote: “The main management objective for the Coats Marsh Regional Park property as identified by the Ecological Gift’s program, the TNT/RDN Lease Agreement and community consensus, is environmental conservation. Human access to the park property is secondary...”

Why then is providing the trail for human use being given priority?

Letter: As per the recommendations in the Plan, signage will be installed identifying that no dogs be allowed in this sensitive area of the park.

Comment: You may expect that such a notice will be ignored. Dogs are currently often to be found on the East Path, albeit well-controlled and not causing a problem because of the wide setback.

Letter: The Plan also recommends a viewing platform be developed on the southern end of the wetland near the Stanley Rd park entrance to provide controlled access to the edge of the wetland area for educational purposes.

Comment: In almost a year of visiting the park and talking to people who are using it and to neighbours, I have never met anyone who regards this idea as other than ludicrous. You cannot get within full view of the lake without disturbing the wildlife on it. It is an unnecessary and frankly unwelcome proposal probably made by people who never actually visit the marsh.

Randy Young, a former member of GaLTT who often dealt directly, and via POSAC B which keeps a fairly low-profile in the community, with you (the RDN) was strongly in favour of a trail or boardwalk around Coats Marsh, so maybe that is where your notion of strong community support for a boardwalk comes from. All I can say is that Randy’s view that human access to a nature reserve should not be restricted, even if in the best interest of the reserve, is a view not supported by the community or indeed by the majority of the GaLTT Board. At a recent meeting of the Gabriola Streamkeepers, it was decided unanimously to express concerns about the RDN plans to the GaLTT Board.

E-mails to [Elaine McCulloch, RDN Parks Planner](#) April 28, 2016

1. Good to see you this morning. I forgot to check with you, though you probably already know, that buffleheads, and we saw several families this morning, nest in cavities in the trees, not in the reeds along the shore, so their nests can be a little distance inland though probably still within sight of the water.
2. According to Wikipedia <25m from the water, a local expert suggested to me up to 20m.

E-mail to Elaine McCulloch, RDN Parks Planner April 29, 2016

cc. Tom Osborne (RDN), Wendy Marshall (RDN), Tom Reid (TNT), Jonathan Lobb (RDN), Howard Houle (POSAC), Chris Hills (GSK), GaLTT

Hi Elaine

Further to my response to you by e-mail on April 27 in response to that of Wendy Marshall, Parks Manager. In the company of Bill Merilees, the well-known author and ecologist from Nanaimo, we, as you know, visited the east side of the marsh, on a plant-investigation expedition on April 28. Although not the objective of that visit, we did have an opportunity to view the ducks active in the distance along the south shore of the lake. We noted about 5 families of buffleheads.

These ducks nest in cavities in the trees, not in the reeds along the shore, so their nests can be a little distance inland though probably still within sight of the water. Bill suggested up to about 20 metres inland, which is in line with the Wikipedia account that says generally less than 25 metres from the water.

This would appear to me to conflict with the assertion in the letter from the Parks Manager that the proposed trail would not disturb the wildlife and would be located in the forest approximately 15-30 metres back from the high water mark of the wetland.

Sincerely

Nick Doe

E-mail from Elaine McCulloch, RDN Parks Planner April 29, 2016.

cc Wendy Marshall

Hi Nick,

It was great meeting and chatting with you yesterday on site. Thanks for the additional nesting info. We identified an alternate route yesterday, trying to keep the trail at least 20-30 back from the edge of the marsh. You can't really even see the marsh for most of the route except for one point that has a log view towards the marsh and also where the trail comes in to join the trail over the berm. I have sent this alternate trail route proposal to The Nature Trust requesting their approval. I have attached the map for your information. I'll let you know what the final decision is.

I will discuss your suggestion of implementing seasonal trail closures to reduce the impact on nesting birds with Tom Osborne, Wendy Marshall, and The Nature Trust.



E-mail to Elaine McCulloch, RDN Parks Planner April 29, 2016

Thanks Elaine. I appreciate your patience in dealing with me, as you know I'm a little upset. There is so little appreciation among managers that the best and simplest and cheapest thing to do in such circumstances, is just leave it alone. Nobody needs trail signs, culverts, fences, groomed trails, viewing platforms.... The people who visit the park can manage quite happily without any of this as they have been doing for years, and they appreciate its "unmucked about with" appearance without all the intrusive human clutter that exists in the outside human-dominated world.

Regards

E-mail to Elaine McCulloch, RDN Parks Planner May 8, 2016.

cc Wendy Marshall

hi Elaine

This weekend I saw a couple of hooded mergansers heading across the lake toward the south shore. Like the buffleheads, they nest in tree cavities, not in the reedy margins.

Families of mallards, one with a 8-10 ducklings rafted together. Frightening them into the open water away from the cover of the reeds is fraught as it is common now to see a bald eagle or two keeping watch. There is a great horned owl around too.

E-mail to Elaine McCulloch, RDN Parks Planner May 9, 2016

cc. Wendy Marshall (RDN), Howard Houle (POSAC), Chris Hills (GSK)

For information I'm planning on discussing concerns about the current Coats Marsh Management Plan with the Gabriola Lands and Trails Trust (GaLTT) at their board meeting tomorrow (Tuesday) at 7 WI Hall (now the GAC Hall) on Gabriola.

This is a follow up to a recent discussion with members of the Gabriola Streamkeepers (GSK) when all members present shared the expressed concerns. GSK is an affiliated committee of GaLTT.

This is a public meeting of the board and all are invited, though in practice, members of the public seldom attend. It's a discussion only, as much as anything my seeking guidance, as we recognize that Coats Marsh is an RDN Regional Park and the RDN is the management authority.

GaLTT Board Meeting hand-out May 10, 2016

Gabriola Land and Trails Trust (GaLTT) Board Meeting
May 10, 2016. GAC (WI) Hall on Gabriola. 7:00 pm

— Gabriola Streamkeepers (GSK) delegation (GSK represented by Nick Doe) on topic of aspects of the Coats Marsh Regional Park 2011–2021 Management Plan.

Notes written by Nick Doe made prior to the meeting.

Background:

Coats Marsh is a Regional Park (CM-RP) managed by the Regional District of Nanaimo (RDN) in partnership with The Nature Trust of BC (TNT). In 2010/11, the RDN Recreation and Parks Department wrote and published the CM-RP Management Plan 2011–2021 [herein referred to as the “plan”] and this was adopted by the RDN/TNT.

Organizations involved and their objectives (abbreviated quotes):

RDN: As with other regional parks ...environmental protection (and the associated opportunity for outdoor education and recreation) is the underlying management guideline. [their parentheses]

RDN/TNT: (with regard specifically to Coats Marsh) Management Plan 3.3.5: The main management objective for the Coats Marsh RP, as identified by the Ecological Gifts program, the TNT/RDN Lease Agreement, and community consensus, is environmental conservation. **Human access to the park property is secondary**, but is provided for the purpose of maintenance and restoration, nature appreciation and education.

TNT: ...manage conservation lands in accordance with long-term management goals for each property, in order to maintain or restore ecological integrity. ...Public access and recreation are allowed ...when consistent with habitat management objectives.

GaLTT: Core values that guide all GaLTT actions are:

- 2.1 The preservation and protection of the natural environment of Gabriola.
- 2.2 Access to parks, trails, ...for the use, recreation and enjoyment of the public.

GSK: ...community based group dedicated to preserving and enhancing local waterways. [which should be taken to include the much-neglected wetlands].

Plan:

While, in general, the consultants who made many of the recommendations adopted in the plan, did a thoroughly professional job fulfilling their mandate using the resources made available to them, the plan did have some weaknesses that the consultants themselves acknowledged. These were essentially a consequence of them having spent only two consecutive days in the park in December 2010, plus one follow-up day when the plan was nearing completion.

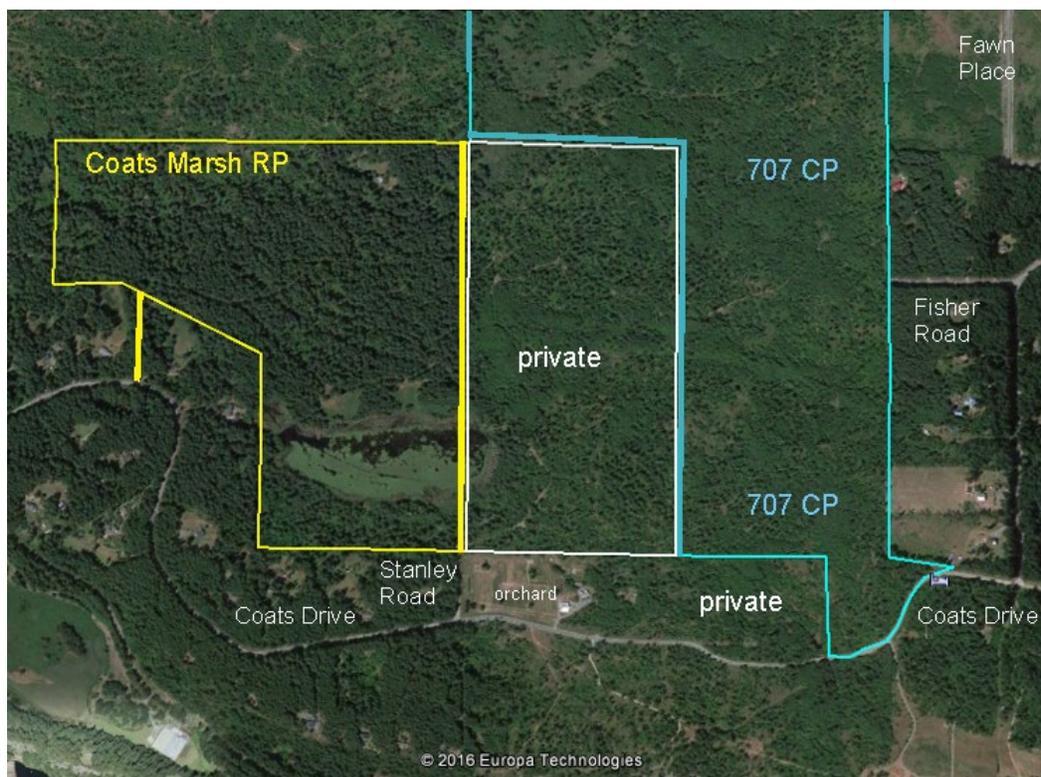
The two main weaknesses were:

—a poor understanding of the hydrogeology of the shallow-water lake in the park leading to misunderstandings of the source of the water in the lake, the effect of beaver activities, and an incomplete picture of annual water-level variations including summer-drought levels, winter flooding, and human-engineered water-level control;

—the lack of any systematic wildlife inventory. The consultants noted that: “...a plant inventory was not completed ...as it was not a good time of year to observe many of understory species”; “...early December, following a week of cold weather, is possibly the worst time and conditions to document the presence of amphibians and reptiles”; and “...twenty-three bird species were recorded as encountered but not systematically inventoried.” This record listed only two species of ducks. It is actually almost impossible to visit the lake and see so few. The consultants recommended that: “...a systematic inventory of wildlife species within Coats Marsh RP should be completed to assist in wildlife monitoring and protection efforts”.

New information

Since that time, we have a better understanding of the ecology of the park and the lake in particular, though an all-important systematic wildlife inventory has not yet been made.





As a mix of being an active GSK member, and my own personal interest, I have been studying the park and the lake for a year now, and have made over 100 recorded visits during that time. The results of hydrological studies are contained in on-line reports, which I will just reference here as they are not germane specifically to the issue at hand.

File 668: Hydrogeology of Coats Marsh, Gabriola Island;

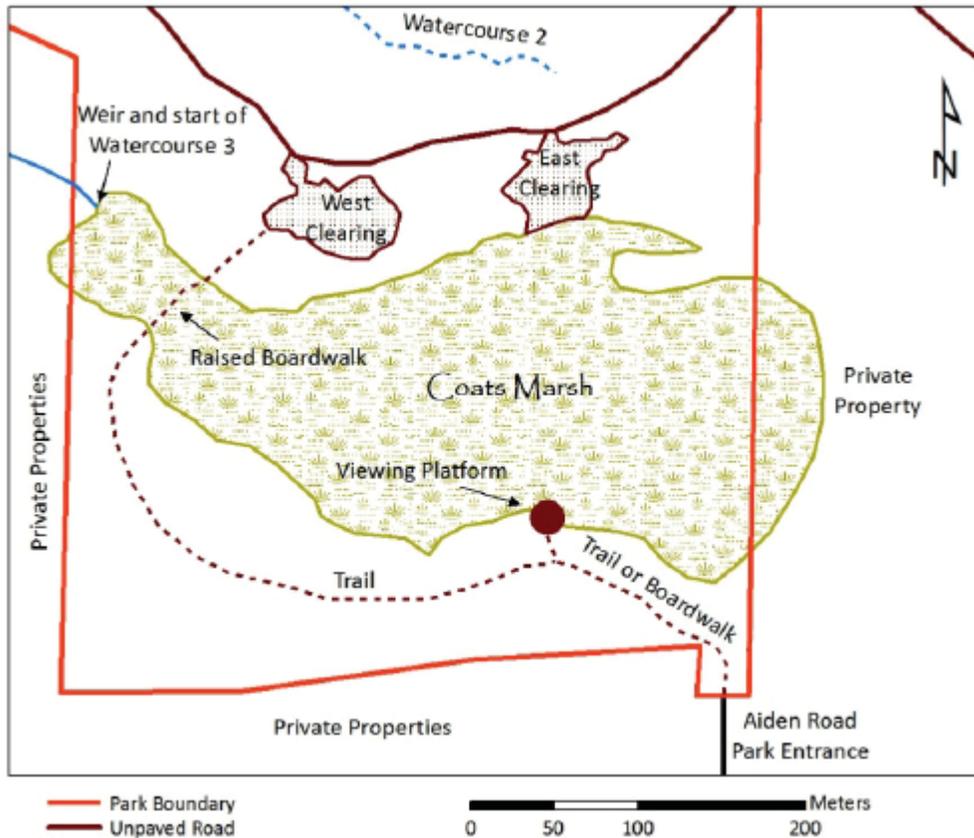
File 673: Observations at Coats Marsh, Gabriola Island;

File 673d: Appendix: Field Notes 2015;

File 673e: Appendix: Field Notes 2016.

Under the heading of new information, we must include the Potlatch Properties density-transfer proposal now in the hands of the Local Trust Committee (LTC) of the Islands Trust. This proposal *might* result in the transfer of private land between the CM-RP and the 707-acre Community Park (707 CP) into the public domain, thereby solving both the issue of connectivity between the two parks, and between the north and south sides of the CM-RP, essentially without the need for building any new trails as shown.

The plan itself recognized the benefits of such a transfer: "...acquisition of the property immediately to the east of Coats Marsh would both offer further protection to the marsh and allow trail access around the marsh and through to the 707 park".



The East Path, which is in good condition, is currently used by people living in the neighbourhood, and by the slightly-more adventurous hikers who do not rely on trail maps and signs to find their way about. Such usage is very generously sanctioned by the property owner.

The South Shore Trail issue

The issue at hand is that the 2011 plan recommended the development of what is now the rough trail along the south shore of the lake. In the plan, this runs from the main entrance at what was Aiden Road, now Stanley Road, to a raised boardwalk across the west end of the lake, which is now an active beaver dam and a vital part of the lake's ecology (map next page).

This informal "trail" is currently overgrown and, although not an especially difficult bushwhack, it is nevertheless a bushwhack, and is hardly used by anybody, certainly not by those walking their dogs and not by those who walk the trails as a leisurely social activity without interest in unguided exploration of the wilder areas of the island's forests.

The consultants remark in the plan that: ...it is recommended that there NOT [my emphasis] be a full perimeter trail or boardwalk around the shore of Coats Marsh, but that trails remain back from the marsh protecting wildlife from human disturbance.

For some years, nothing has happened, but just recently the RDN showed interest in activating this feature in the plan and the route has been surveyed and flagged. Instead of the raised boardwalk at the west end, the proposed trail would end on the causeway at weir bay.

My objections to this plan are as follows:

1. At least one and possibly two species of duck (buffleheads and hooded mergansers) use the trees in this area as tree-cavity nesting sites. Full protection would require the trail to be at least 25–30 metres back from the water. Some people who use the trail will inevitably want to get a better view of the water than this allows, and so will sidetrack to the shore.
2. Opening up a route completely around the lake would probably significantly increase the human traffic in what is supposed to be a nature reserve. Some of these people will be walking their dogs as they currently do on East Path, any RDN-signage notwithstanding.
3. The entrance to the trail at the east end can be expected to be flooded on a regular basis in winter.
4. Ducks are hunted creatures and are very easily alarmed by the appearance of humans on the lakeside. This is especially dangerous for them when they are accompanied by ducklings, as by moving from the reeds to open water they are attracting the attention of predators. The lake is regularly monitored in the spring by bald eagles and Coopers' hawks, and there are also great horned owls in the park. Crossing the causeway invariably alarms any waterfowl wildlife in weir bay as it is impossible to cross unobserved.
5. The conductivity provisions (CM-RP to 707 CP, and N to S CM-RP) noted above may not in future be needed.
6. There is abundant evidence in this and other parks that trails open up routes for the spread of introduced and invasive species.

Responses

On January 20, 2016, I sent an e-mail to Howard Houle (RDN) with a copy to info (GaLTT) regarding my disapproval of the RDN's intention to build a trail in the CM-RP along the south shore of the lake. I received no acknowledgement of receipt of this message nor any replies.

I have since queried this with Howard and he informs me that he passed the e-mail on to Elaine McCulloch (RDN, Community Parks Planner) and hence felt no reply from him was necessary. There was a POSAC B meeting on February 16 according to the RDN website, but I heard nothing from them or from Elaine.

On April 17, I sent essentially the same e-mail with minor revisions to Tom Osborne (RDN, General Manager of Recreation and Parks) with FYI copies to Wendy Marshall (RDN, Manager of Parks Services), Streamkeepers (GSK), info. (GaLTT), Melanie Mamoser (LTC), and Howard (RDN).

On April 27, I received a response from Wendy Marshall, basically saying thank you but we're going ahead with the plan (attached with my response).

I have since corresponded with Elaine McCulloch and I have met her on site where we had a good discussion of the issue. She has since revised the route of the proposed trail (map attached) to move it away from the shoreline and proposed that it be closed during the duck-breeding season.

The last I heard (May 10), is that no final decision has yet been made on the revised route by the RDN and TNT.

E-mail to Elaine McCulloch, RDN Parks Planner January 19, 2017

HNY and all that. Attached notes for the file on the south shore path in Coats Marsh. The lake was thoroughly iced over for a while there.

Observing ducks and geese at Coats Marsh, Gabriola Island

Coats Marsh is used by year-round residents, winter residents, and transients in the fall and spring. Because of the small size of the lake, they are very susceptible to human and canine disturbance. This disturbance potentially impacts not only ducks and geese attempting to breed there, some of which used tree cavities for nesting, but it also impacts transients who are using the lake for two or three days during their arduous migrations.

Following is the current list of species that have been observed using the lake at one time or another (Jul.2015-Jan.2017).

DUCKS & GEESE	List 16 Version 1.1
Wood duck	Aix sponsa
American widgeon	Anas americana
Northern shoveler	Anas clypeata
Mallard	Anas platyrhynchos
Gadwall	Anas strepera
Ring-necked duck	Aythya collaris
Canada goose	Branta canadensis
Bufflehead	Bucephala albeola
Common goldeneye	Bucephala clangula
Trumpeter swan	Cygnus buccinator
American coot	Fulica americana
Hooded merganser	Lophodytes cucullatus
Common merganser	Mergus merganser

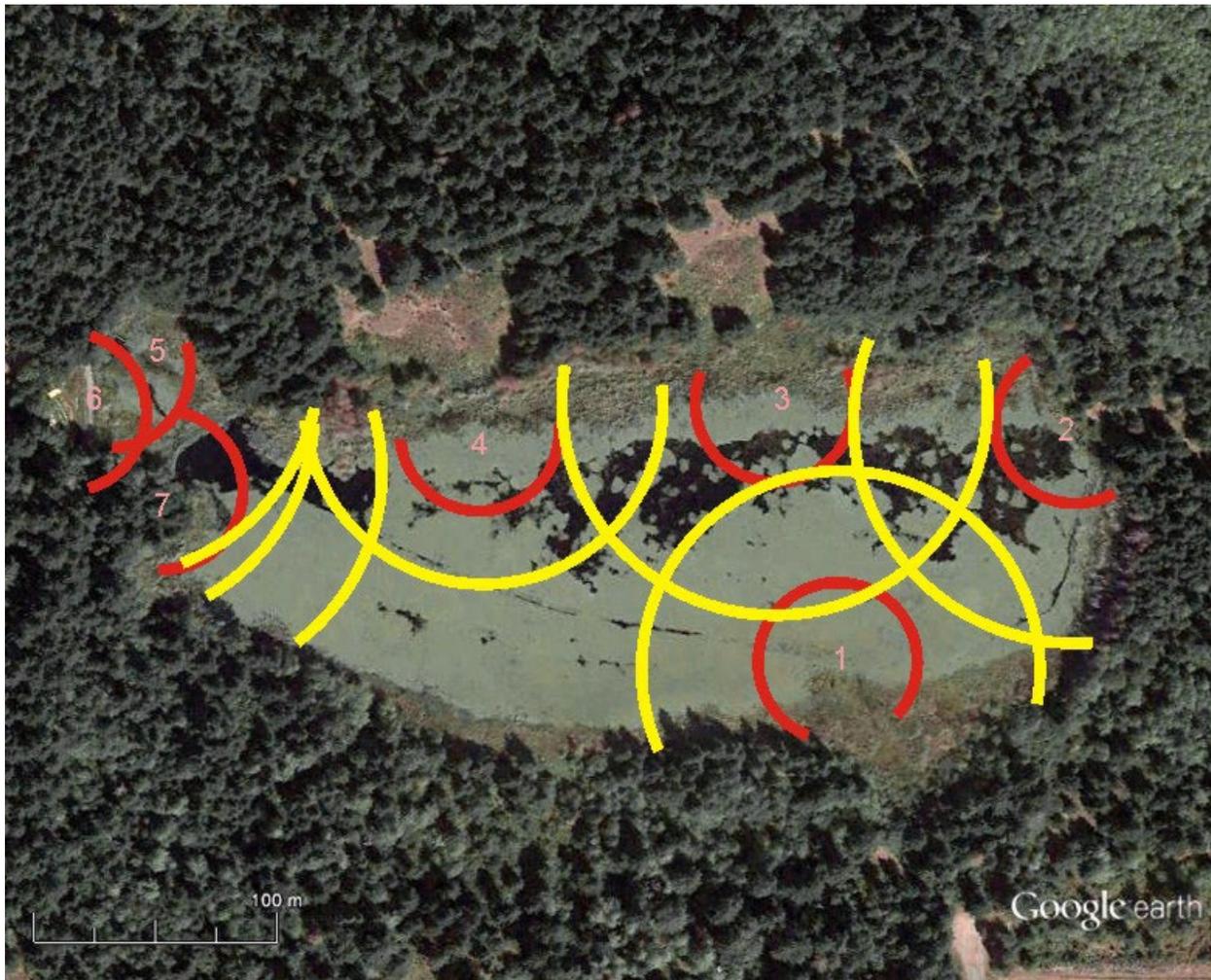
Of these only mallards are year-round residents.

Ducks that have been observed with ducklings are mallards and hooded mergansers.

Ducks and geese that are present in couples during the breeding season, but have not been observed with young, are buffleheads and Canada geese.

Common winter residents are ring-neckeds, buffleheads, and widgeons.

The remainder are transients, usually present for only a few days at a time. Transient Canada geese and mallards, sometimes in large numbers, are seen in addition to those that spend more time there.



The above map of the lake shows the areas where disturbance by human presence is most likely. The arcs are based on my observations as a fairly cautious observer taking advantage of any cover, and not moving swiftly within sight of the ducks, but not using a blind of any sort.

The red arcs (55m range) indicate areas where the birds will take flight immediately when one or more of the flocks see you. When this happens, some transients leave the lake never to be seen again, but the residents and those that spend more time there will fly off into a distant part of the lake.

The yellow arcs (90m range) indicate areas where the birds will obviously be alarmed at your presence. They will either paddle away at great speed, or they may take flight depending on how much cover is available for the viewer. Transients particularly are usually very nervous.

The viewing areas are: 1. Stanley Road entrance; 2. Popular spot off of the East Path on private property (extensive view of the lake); 3. North shore east clearing (this spot has some cover afforded by trees at the water's edge); 4. North shore west clearing (this spot also has some

cover); 5. The weir; 6. The berm; 7. The south end of the beaver dam with a view over most of the western portion of the lake.

It's clear that keeping the south shore a disturbance free zone is important not just during the breeding season, but during the spring and fall migrations.

E-mail to Elaine McCulloch, RDN Parks Planner June 11, 2017

hi Elaine

This spring has been good at the marsh. The total number of species of swans, geese, and ducks observed there is now up to fourteen and we have had two more breeding species at the lake -- blue-winged teals and pied-billed grebes. They are added to mallards and hooded mergansers that are breeding there again this year. Thanks to the lake's tranquility, the ducks seem to be doing well, and at one point it looked as if a couple of buffleheads were going to breed there too.

All together I have seen there now about 50 different species of birds.

Letter on management of Coats Marsh RP following acquisition of the private land to the east (the Rooks Density Swap).

E-mail to Elaine McCulloch, RDN Parks Planner, Howard Houle, RDN Director Area B, September 18, 2018.

hi Elaine & Howard

Further to the sad news that the RP can't be extended eastward despite the land there being an integral part of the CM ecosystem, would making the relevant area a CP separate from the 707CP work? Not saying this is the best alternative option, but wondering if it is an option. Its management plan could then be a cut and paste job of the CM plan, and being identified independently of the 707CP might help the general public understand that the rules are different there.

My thinking is that the CM RP has been underestimated as an ecological reserve and thinking ahead I'm planning on lobbying for it to be given more Nature-Reserve protection (P4 zoning status if and when the IT gets over the density transfer question and follows up on creating such a zone).

Looking forward to seeing the CM Plan revised. There are several issues to do with flooding and water conversation there that are badly out-of-date.

E-mail response from Elaine McCulloch, cc. Howard Houle, Wendy Marshall, Tom Osborne, September 18, 2018

Hi Nick,

That's an interesting idea. We'll discuss it internally.

Letter on management of Coats Marsh RP and 707 CP following acquisition of private lands (the Potlatch Density Swap).

Letter sent March 24, 2019:

1787 El Verano Drive
Gabriola, BC
Canada V0R 1X6

E-mail: nickdoe@island.net

Phone: 250 247 7858

March 24, 2019

Letter by e-mail to:

Wendy Marshall, RDN Manager of Parks Services: wmarshall@rdn.bc.ca

Rob Brockley, President Gabriola Land & Trails Trust: info@galitt.ca

Tom Reid, Vancouver Island Conservation Land Manager, Nature Trust of BC :

treid@naturetrust.bc.ca

Copies by e-mail to:

Vanessa Craig, RDN Director,

Chair Electoral Area B Parks & Open Spaces Advisory Committee:

vanessa.craig@rdn.bc.ca

Dan Rogers, Gabriola Island Local Trust Committee Chair: drogers@islandstrust.bc.ca

Chris van Ossenbruggen: RDN Parks & Recreation, Operations Coordinator:

CvanOssenbruggen@rdn.bc.ca

Elaine McCulloch, RDN Parks Planner: EMcCulloch@rdn.bc.ca

Jasper Lament, CEO The Nature Trust of BC: jlament@naturetrust.bc.ca

Scott Colbourne, Trustee Gabriola Island Local Trust Committee: scolbourne@islandstrust.bc.ca

Kees Langereis, Trustee Gabriola Island Local Trust Committee: klangereis@islandstrust.bc.ca

Coats Marsh RP and the Potlatch Density Additions (Coats Marsh East and 707 CP SW)

While pleased that Gabriola has recently acquired new parkland, namely Coats Marsh East (W½ of NE¼ Sec. 10 except remainder) and 707 SW (SE¼ Sec. 13 except.. and SW¼ of Sec.14), I am rather disturbed that management planning for these new areas appear to be going ahead without any opportunity that I am aware of for public or even GaLTT membership input. This is despite the fact that the current management plans for the 707 CP and Coats Marsh RP will be shortly up for renewal, and that the Islands Trust LTC is actively considering creating a new P4 zone which will give them a tool to designate areas where the needs of wildlife have absolute priority. The Coats Marsh RP Management Plan in particular very badly needs up-dating to incorporate new knowledge about the ecosystems there and the parks hydrogeology.

It is to be regretted that it is not possible administratively for the Coats Marsh East land to be integrated with the existing Coats Marsh RP when having an administrative boundary separating the east shore of the *marsh* and the catchment area of the *marsh* from the rest of the *marsh* is going to create problems in an area that is so obviously ecologically integrated.

Exactly how it is intended to manage usage of any trails that cross seamlessly from the new lands into Coats Marsh RP is unclear. Simply making all of the new lands a part of the 707 CP, and even contemplating new trails into the Coats Marsh RP from the 707 CP, would I submit run a grave risk of weakening the stated current goal of Coats Marsh RP management as identified by the Ecological Gift's program, the TNT/RDN Lease Agreement, and community consensus, to give environmental conservation priority, and to make human access to the park property a secondary consideration. Coats Marsh is I have no doubt one of the properties that the Islands Trust would have in mind if the P4 zoning tool comes into being.

I would respectfully request that the RDN and GaLTT do not make any substantial alterations to the existing trail systems until the public, including GaLTT members, have been informed as to the nature of the changes, and had an opportunity to comment on them. GaLTT's eagerness to have the trails updated without consideration of the ecological damage that they do in an effort to have new maps ready before the tourist season appears to me not to be compatible with their mandate "...to preserve sites of environmental ...importance". This is disappointing.

Sincerely

Nick Doe

Responses:

March 25, 2019

Hi Nick,

Thanks for the letter. I will ensure that this is added to the next POSAC meeting agenda as correspondence.

Cheers,

Elaine McCulloch

Parks Planner, Recreation and Parks

March 25, 2019

Thank you for this Nick. I am forwarding to Trust planning staff, including the planner responsible for the P4 priority project.

All the best,

Scott Colbourne

April 14, 2019

Dear Nick,

I'm writing to you in response to your letter of March 24, 2019, in which you express your concerns about management planning in the 707 Community Park, including the recently-acquired parkland adjoining Coats Marsh Regional Park.

Your concerns appear to be associated with a project that Gabriola Land & Trails Trust {GaLTT} is currently undertaking in cooperation with Regional District of Nanaimo (RDN) Parks staff to update signage in the parkland described above. Over the past several years, GaLTT has identified several signage deficiencies within the 707 Community Park, both from our own observations, and from several years of feedback from frustrated trail users. Specifically, several of the mapped trails currently lack numbered posts at some trail intersections. There are other well-used, un-posted side trails that are not currently shown on RDN and GaLTT maps. These unmarked side trails have clearly become more visible since the 707 Management Plan was written. GaLTT's position is that clearly visible minor trails {i.e., regularly used} should be marked with numbered posts and mapped to make the 707 Community Park trail system safer and more user-friendly. Faintly visible side trails should remain unmarked and unmapped, but remain available to those who know where they are and wish to explore them.

GaLTT submitted a comprehensive re-signage proposal for the 707 Community Park to the Electoral Area 'B' Parks and Open Spaces Advisory Committee {POSAC} in early 2015. It was subsequently agreed by POSAC to defer implementation of the plan until the Potlatch density-transfer application was resolved, at which point the plan could potentially be amended to include the new "donor" lands.

As you know, 336 acres of additional parkland adjacent to the 707 Community Park were recently received by the RDN as part of the Potlatch density-transfer application {BG-RZ-201-6.1}. The well-established trails within these "donor" lands do not currently have posts at trail intersections. The RDN and GaLTT both agree that this is something that should be rectified as soon as possible now that the trails are open for public use.

I conducted two field tours with Board members, representatives of the Gabriola Off-Road Cycling Association, and other interested individuals this past winter. Based on the input received, I subsequently met with RDN staff and proposed an updated post and signage plan for the entire 707 Community Park, including the new "donor" lands. The RDN supported our proposal, which consisted of installing 46 new posts at trail intersections in the original and expanded 707 Community Park. GaLTT offered to install the posts with volunteer labour so that the project could be completed in time for a new GaLTT trail map to be published by early summer. We believe the re-signed 707 Community Park trail system will be a safer, and more user-friendly, recreational area.

Trail-building is not part of the current re-signage project. GaLTT may be interested in having future discussions with the RDN, and others, about opportunities to improve trail connectivity in the newly acquired parkland. In fact, we have already identified a couple of potential short connections that would expand walking and cycling loop opportunities by making use of previously-established and overgrown logging roads. Consistent with GaLTT's three previous trail-building projects in Cox Community Park, we would not consider proceeding with any work without going through appropriate channels and obtaining the required support and approvals. As you suggested in your letter, the future review of the 707 and Coats Marsh RP management plans would be an appropriate time to have these public discussions.

GaLTT Board members feel your statement "GaLTT's eagerness to have the trails updated without consideration of the ecological damage that they do in an effort to have new maps ready before the tourist season appears to me not to be compatible with their mandate..." is both inaccurate and unfair. Ecological sensitivity is always considered by GaLTT when proposing new trail routes. As you may recall, GaLTT previously urged the RDN to abandon immediate plans to build a trail around the southern edge of Coats Marsh due to the potential for ecological damage and disturbance to wildlife. We have also been proactive in efforts to install wooden boardwalks on trails within the Elder Cedar Nature Reserve, and a boardwalk around the Elder Cedar tree itself, in order to avoid further soil degradation and to protect tree roots. Finally, our preliminary plans to build a trail above Winthuysen in Descanso Bay Regional Park have been put on hold until discussions are held with Streamkeepers, and others, to ensure that the proposed route does not impact the creek and adjacent wetland.

Despite our objections to some of your statements, your letter has been very useful in stimulating Board discussion on several key issues. Your letter reminded us that GaLTT is undoubtedly best known within the Gabriola community for our trail-building and maintenance efforts. Our conservation efforts are less known, and this is something that I wish to address in our next Strategic Plan review. Also, your letter was a good reminder that the GaLTT Board needs to learn more about the Gabriola Island Local Trust Committee's interest in establishing a new ecological protection zone for some of Gabriola's protected lands and to be prepared to articulate our stance on this important issue. Finally, you raise important concerns about the

future management and protection of Coats Marsh, especially now that its trails are interconnected with the new "donor" lands and the 707 Community Park.

Regarding this latter issue, the GaLTT Board has asked me to invite you to attend our June 11th Board meeting to present your views on Coats Marsh management planning and any other concerns you may have regarding management of the interconnected 707 Community Park. Please let me know if you would be willing to speak for about 20 minutes at the beginning of our June meeting followed by a brief question and answer session.

Yours truly,
Rob Brockley
President, Gabriola Land & Trails Trust

Follow-up e-mails .

Sent March 26, 2019:

Thanks Scott. It's heartening to see interest in the non-human species that share our island when so much attention these days is focused on the needs of a seemingly inexorable growing human population. Keep up the good work.

Over the years I have kept a diary/blog of visits to Coats Marsh RP and surrounding then private lands, but it rambles a bit so I have recently compiled a summary with words, but of more interest perhaps, a selection of pictures. Just scroll to GALLERY at the end of the files if you have the time and interest. Thanks again.

<https://nickdoe.ca/pdfs/Webp691.pdf> CM geology
<https://nickdoe.ca/pdfs/Webp692.pdf> CM flora
<https://nickdoe.ca/pdfs/Webp693.pdf> CM fauna

N.

Sent March 29, 2019:

Wendy Marshall, RDN Manager of Parks Services: wmarshall@rdn.bc.ca

Rob Brockley, President Gabriola Land & Trails Trust: info@galitt.ca

Tom Reid, Vancouver Island Conservation Land Manager, Nature Trust of BC :
treid@naturetrust.bc.ca

Vanessa Craig, RDN Director,

Chair Electoral Area B Parks & Open Spaces Advisory Committee:
vanessa.craig@rdn.bc.ca

Elaine McCulloch, RDN Parks Planner: EMcCulloch@rdn.bc.ca

Scott Colbourne, Trustee Gabriola Island Local Trust Committee: scolbourne@islandstrust.bc.ca

Further to my letter of March 24, 2019 on the above topic, I have now posted a much longer and more detailed account of my concerns and suggestions for management of the region and protection of its ecologically sensitive areas. This is available at:

<https://nickdoe.ca/pdfs/Webp690.pdf>
currently as Version 1.1.

Thank you for your consideration.

Sent April 23, 2019:

To Vanessa Craig, RDN Director,

Chair Electoral Area B Parks & Open Spaces Advisory Committee:

cc.

Wendy Marshall, RDN Manager of Parks Services: wmarshall@rdn.bc.ca

Rob Brockley, President Gabriola Land & Trails Trust: info@galitt.ca

Elaine McCulloch, RDN Parks Planner: EMcCulloch@rdn.bc.ca

Scott Colbourne, Trustee Gabriola Island Local Trust Committee: scolbourne@islandstrust.bc.ca

Dear Vanessa

...

I would like to add to my letter of March 24, 2019, on the topic of planning for the newly-acquired lands on Gabriola abutting the 707 CP and Coats Marsh RP, the submission referenced in my letter of March 29, 2019, File 690 (my reference) with the request that it be entered as POSAC Area B correspondence. I will be attending the June 17 meeting should the committee make time for this to be discussed.

That File 690 was not ready on March 24 is because I was expecting to be able to present this material for discussion in a public process, a POSAC meeting in accordance with its mandate to take a leadership role in cooperation between community interests and the Regional District, and to provide community input to park planning. However, I discovered to my surprise that GaLTT had already advanced its plans for trails in the newly-acquired lands, even to the extent of flagging potential new trails within both the donor lands, the existing 707 CP, and Coats Marsh RP quite contrary, in my view, to the existing Management Plans.

I am currently in discussion with GaLTT about what I perceive to be an unresolved conflict in their mandate. On one hand they aim to provide trails and encourage their use, not just by Gabriolans but tourists visiting the market, and on the other they aim to protect ecologically sensitive areas. All trails, or more precisely trail usages, degrade the environment to varying degrees. It's a trade-off. This was why the Islands Trust Conservancy advocated removing reference to the Elder Cedar Reserve from tourist information sources and requested GaLTT to not put trails in the reserve on its maps. Therein lies the conflict that the GaLTT board seems to me to not recognize.

My hope is that by writing these letters I will put the RDN, POSAC, GaLTT, and the Islands Trust LTC with their P4 initiative, on the same page. Something I feel passionately about, even though I may be in a minority.

Thank you for your time and service.

May 1, 2019

Hello Nick,

Thanks for this note - you're right, I apologise - the next POSAC meeting is scheduled for June 17th (not 7th) at 6 pm at the GAC Hall. Your correspondence will be included for the committee to review.

Cheers,

Vanessa

Sent May 9, 2019:

Rob Brockley

President Gabriola Land & Trails Trust

PO Box 56, Gabriola V0R 1X0

Hi Rob

This is a response to your letter dated April 14, 2019, which in turn was a response to mine of March 24, 2019 concerning management planning of the 707 CP, Coats Marsh RP, and the two blocks of newly-acquired lands provisionally referenced, by me at least, as 707 SW (the parcel formerly owned by Dr. Robert Rooks) and Coats Marsh East (the land formerly owned by Mr. Brian Henning).

I thank you for your letter, and appreciate very much that you and the GaLTT Board must have spent some time in formulating your April 14 response. I will say at the outset however, that it has not allayed my concerns. On the contrary, it has re-inforced them. My impression overall is that you and the GaLTT Board have not understood them, and as I will explain below, I will be declining your offer of meeting with the Board on June 11, but will instead be presenting my concerns at the POSAC Area B meeting on June 17th.

It was partly my fault that not included in my letter of March 24 was a copy of my thoughts on planning for the updating of the 707 CP and Coats Marsh RP Management Plans due in 2020 and 2021 respectively. This I hastily attempted to rectify with my letter of March 29, 2019 to you linking to [File 690](#), and of April 23 to the POSAC Chair with a copy to you containing File 690 as an attachment. That File 690 was not ready on March 24 is because I was expecting to be able to present this material for discussion in a public forum. The historical reasons for this are twofold.

At a POSAC meeting that I attended a few years ago, the then member Randy Young, also a GaLTT Board member at the time, presented a plan, very much I imagine like the one you refer to in your letter, for additional signage within both the 707 CP and the newly-acquired land (707 SW), then still in private hands but with public access generously allowed by the owner. Unfortunately I have been unable to find a minuted note of this in the POSAC records, but I recall very clearly that the POSAC Chair's response to Young's proposal was that additional

signage was contrary to the existing 707 CP Management Plan and that consideration of it by POSAC would have to await a revision of said plan.

The second factor was that in recent correspondence with the GaLTT Vice-President regarding mapping in the donor lands (707 SW) I remarked that:

Just so you know, I'm preparing a very detailed brief on the donor lands and Coats Marsh RP and their ecology for the upcoming Management Plan public discussions and it will include my thoughts on trails. The Coats Marsh Plan 2011-2021 needs serious revision.

I'm very wary of this being merged with GaLTT's contributions, basically because I fear GaLTT's approach may be too much "trails everywhere" for my liking without regard for the ecological damage that trails with unlimited access can do, and GaLTT's rather lukewarm support so far for P4 nature reserves.

To which, the reassuring note I received was:

Not to worry, I get that. We will get to have lots of interesting discussion about what trails and what users. Already there are pedestrians only permitted in the Coats Marsh Nature Reserve. As to where a main trail corridor should pass through the new Potlatch areas, as you say it is early days yet. A rather large risk to the park and the nature reserve is the inclination of people to just "make" new trails in area that could/should be left for wildlife.

It appears to me that GaLTT is taking on the responsibilities that I would consider to be the responsibilities of POSAC. While GaLTT may be admirably placed to provide liaison with the Regional District, it meets regularly unlike POSAC, GaLTT makes minimal provision for gathering public input. Its board meetings and agendas are not advertised, and minutes of such meetings are not made available in a timely fashion. In contrast, POSAC's Terms of Reference (April 24, 2013) make it crystal clear that their role is to take a leadership role in cooperation between community interests and the Regional District, and that it is to provide opportunities for community input to park planning.

An example of GaLTT taking on POSAC's role is the note on your letter:

I conducted two field tours with Board members, representatives of the Gabriola Off-Road Cycling Association, and other interested individuals this past winter. Based on the input received, I subsequently met with RDN staff and proposed an updated post and signage plan for the entire 707 Community Park, including the new "donor" lands.

Where here is community involvement?

You go to some lengths to explain the re-signage project, remarking that in your and the RDN's view this should be done as soon as possible now that trails are open for public use. Be that as it may, I am certainly not against signage *per se*, but to my mind the re-signage should only proceed after use of the newly-acquired land has been planned.

I do not see the virtue of erecting signage and publishing maps that may imply to users that trails in the newly-acquired land are multi-use 707 CP trails when there exists a possibility that an outcome of a future planning process may be that usage of some of these trails will be restricted, not promoted in tourist literature in the interests of conservation, or even that they will not be in the 707 CP at all but will part of a newly-created area with some P4 Islands Trust zoning. An example of his like-minded concern might be the Islands Trust Conservancy requesting the

removal of reference to the Elder Cedar Reserve from tourist information sources and requesting that GaLTT not put trails in the reserve on its maps.

As you are aware, the previous signage decided upon was not a success. It was founded on the identification of branches of the trail network rather than its nodes. People need to know in which direction to go, not that they are on, for example, “a trail to nowhere”. This decision to describe the network by its branches, not by its nodes, was I suspect the result of attempting to use trail names, or a lack thereof, as an indicator of permitted usage. Though well intentioned, it was a failure in that users had no means of knowing, other than by reading the Management Plan that naming a trail had any such usage significance. The consistency and organization of the orientation of the posts was also a concern. These weaknesses might have been avoided if signage proposals had been discussed in a public forum.

It is for me ironic that in the above quoted GaLTT Vice-President’s e-mail to me it says: “a rather large risk to the park and the nature reserve is the inclination of people to just ‘make’ new trails in area that could/should be left for wildlife.”

This is an activity that GaLTT itself has been engaging in. As you know, I recently had to remove GaLTT yellow-tape flagging of a potential trail crossing to and from the 707 SW and the Coats Marsh RP through an area specifically recommended as being trail-less in the current Coats Marsh RP Management Plan. I note with some concern that amongst the posts recently erected are two at the intersections of existing trails that I would consider excellent examples of trails needing P4 zoning protection, and I will be interested in learning with some trepidation what the RDN-GaLTT intentions are for signage to be attached to these posts and how they will be mapped.

You remark in your letter that: “faintly visible side trails should remain unmarked and unmapped, but remain available to those who know where they are and wish to explore them.” I have to wryly note that this is currently not allowed:

707 CP Management Plan 6.2.6: “Because park visitors are required to stay on designated trails...”

707 CP Management Plan 6.3.1: “All authorized recreational activities for the 707 CP are restricted to trails, meadow clearings and other designated areas.”

which brings me to my final point.

The essence of this disagreement is the divergence of views on the principles on which the management of the 707 CP should be based.

At one end of the spectrum are those who believe that the best management is almost no management. The idealistic concept is having the forest revert to its pre-logging pristine state is understandable but of course unrealistic given the lack of tolerance of wildfires, the spread of invasive species, climate change, growth of human population, and fear of medical or other emergencies while out in the field, but the “just leave it alone” “keep it wild” feeling still pervades. Some people don’t want their exploration of the forest to be managed, any more than they do the forest itself. The Kensington Lands are a good example of this “non-management” style.

Quotes from the current 707 CP and Coats Marsh Management Plans supporting this view are:

—“ the idea of ‘minimal intervention’ was the overriding theme for the management of the 707 CP as derived from public consultation” (p.iv, Community Input and Feedback)

—“ majority of participants wanted the park maintained as a natural area with minimal facilities and trails. The only recreation activity that received significant support was walking/hiking” (CM p.6, Public Consultation)

—“community members generally wanted to see as little development in the park as possible and as little interference as possible with the natural process of ecological succession that is currently regenerating the 707 CP forest after years of logging” (p.iv, Community Input and Feedback)

—“the 707 Community Park is a special wilderness recreation sanctuary providing a deep ecological and spiritual connection between humans and nature, with minimal impact to the environment” (p.28, Vision)

—“there was a general feeling that nature needs to be allowed to take its course in repairing and restoring the ecosystem in the 707 CP” (p.8, Open House #1)

—“residents felt strongly about the use of minimal and non-invasive signage, as well as minimal trail construction, keeping the paths as natural as possible”(p.8, Open House #1)

— “managing the 707 CP as a community space primarily for residents of Electoral Area “B” without active promotion of tourism-based activities in the park” (p.27, Summary of Issues).

At the other end of the spectrum is the “urban-park” concept where the over-riding issue is human recreation in an environment where safety is provided by managers, not by the taking of personal responsibility for it. Ecologically sensitive areas within such parks, if they exist, are usually off-limits to all users. Human traffic is often high, and even encouraged, in such parks, and wildlife restricted to that that tolerates human disturbance. In forests, weedy invasive plant species dominate the verges and 4-feet of broad trails groomed for vehicular traffic.

Quotes from the current 707 CP and Coats Marsh Management Plans:

—“most public session attendees or mail respondents reiterated or expressed support for management plan principles and policies, the strongest support being for signage and trailmarkers in the park” (p.10, Open House #2)

—“creating a clear, comprehensive and unobtrusive wayfinding system for park users through the use of trail names, signage, markers, and maps” (p.27, Summary of Issues)

—“identifying an effective emergency response route from main public roads through the 707 CP and ensuring that road surfacing, grade, width and overhead clearance are maintained to accommodate fire, ambulance, and police vehicle access” (p.26, Summary of Issues)

—“maintaining a potential helicopter landing site along the main emergency route” (p.26, Summary of Issues)

—“most respondents felt that very little change was required to the park, however the following improvements were suggested: trail maps, interpretive information and directional signs, benches, and boardwalk” (CM p.6, Public Consultation)

—“a system of clearly delineated paths, including boardwalk and viewing platforms in the wetland area, would provide a trail circuit throughout the park while directing pedestrian traffic within designated recreational areas” (CM p.18, Trail Development) [based on a total misunderstanding of the ecology]

—“a burn-pile clearing on the north edge of the marsh provides excellent views of the wetland area and is well suited to rustic amphitheater seating for lectures and presentations” (CM p.20, Facility Development) [destroying an ecosystem to provide a place to talk about ecosystems? complete with a parking lot?].

The way the current 707 CP management deals with this division of opinion is by use of the two-tier trail system which permits multi-use access for cyclists, pedestrians, and horses to main trails, which are signed, and limited access for cyclists and pedestrians only to side trails, which remain unsigned. This scheme is widely not understood or ignored. Horse-riders, for example, actually seem to prefer to use side trails (understandably) to the main trail “highways”.

Very fortunately, there has been hitherto an alternative solution. That is to designate whole areas as either for “maintrail” or “sidetrail” usage and have the *de facto* maintrail usage applying to the whole of the 707 CP, and the *de facto* “sidetrail” usage applying to the Coats Marsh RP together with Coats Marsh East until now private land. Until now there have been no border-crossing trail issues.

It is this workable compromise that is being threatened now by the GaLTT inspired “trails everywhere” vision and the movement of Coats Marsh East into the public domain. For those like myself who have savoured the quietness, solitude, tranquility, and the wildlife in the Coats Marsh RP and Coats Marsh East areas, some of which is sensitive to human disturbance and seeks out small, secluded wetlands, this is not progress.

I would have appreciated a public discussion before any pre-emptive planning is put in place. As remarked at the beginning of this letter, in my view POSAC is where I should be voicing my concerns and I will not therefore be participating in a discussion with the Board on June 11th.

Sincerely and with appreciation for most, if not all, of the other of GaLTT’s endeavors,

Nick Doe

LTC Proposal to create an Ecological Protection (P4) zone where ecosystem protection would be paramount

July 9. 2019

Gabriola Island Local Trust Committee

sent by e-mail

Re: Development of an Ecological Protection Zone

Dear LTC members

I have the following comments on the Staff Report dated July 11, 2019 and, in particular Attachment 2, Ecological Protection (EP) zone. Most of these comments pertain to the Coats Marsh Regional Park and the additional park land to the east of it (Coats Marsh East) which has been temporarily designated by the RDN as being part of the 707 Community Park pending a review of the 707 CP Management Plan in 2020.

The report has generated some confusion in my mind as to its purpose, some of which is undoubtedly a result of my lack of detailed knowledge of the Island's OCP and its attendant LUBs. My perspective is that of one who has a keen interest in conservation in general, and in Coats Marsh RP in particular whose wildlife, ecology, and hydrogeology I have studied in detail with frequent visits in all seasons for almost a decade.

It was the hope of myself and other like-minded persons that the Islands Trust would add to the Parks zones (GI LUB 177 - Schedule A, July 9, 2018) an ecological zone designated P4. The creation of this zone would be in recognition of the fact that none of the existing three zones allow for a list of permitted principal uses that unequivocally excludes almost all human activity in the interests of protecting sensitive wildlife habitat.¹ One of the weaknesses of the Islands Trust planning process for environmentally sensitive areas is that it often relies for information on the Islands Trust Sensitive Ecosystems Mapping (SEM) system, which is based solely on aerial photographs, is now out-of-date, and lacks any reference to the disproportionately important small riparian areas in, for example, Coats Marsh East. It has become of very limited value as a planning tool.

What the report appears to suggest however is that its purpose is to enable the re-zoning of Coats Marsh RP in such a way that it conforms with the current RDN 2011–2021 Management Plan. The two objections to this are (a) that plan is obsolete and is now due to be revised in 2020 concurrently with revision of the 707 CP, and (b) simply duplicating the Management Plan is unnecessary and will rapidly lead to situations where it and the EP zoning disagree.

We can already see this happening in that the draft EP zone document refers to buildings within the EP zone when the RDN have already demolished all buildings within the RP, as is appropriate for an environmentally sensitive area. Why not simply zone the Coats Marsh RP as a P1 zone and leave the detailed planning to the RDN requiring only that the environmentally-friendly goal for the park—ensuring the long-term development of healthy forest and wetland ecosystems by minimizing recreational impact; and discouraging access to sensitive areas easily disturbed by human presence—be retained when the plan is revised.

One of the weaknesses of the RDN Management Plan 2011–2021 was that it was based on observations by consultants who made two one-day visits to the area in mid-winter in 2010. They thereby completely missed learning of the wildlife population of the lake during the breeding season, the wing moult period that leaves them flightless, and the spring and fall migratory seasons when the birds need to be able to rest. Only three swan, goose, and duck species were identified by the consultants whereas year-round observations have shown that the shallow-water wetland (the 'lake') is used by at least fifteen such species, and implementing some of the goals in the current plan would impact them severely.

¹ Reference letter to the LTC dated July 6, 2016 from Deborah Ferens, Re: GB-RZ-2016.1 Application to Redesignate and Rezone Lands to Facilitate Density Transfer and Parkland Donation.

One of the positives of the subject Staff Report is recognition that the Coats Marsh East additional parkland, which includes the eastern shore of the lake and is an integral part of the Coats Marsh ecosystem, needs separate zoning from the existing 707 CP. I would like to see it as a new CP.

Thank you for your attention

Nick Doe (signed)

1787 El Verano Drive

Gabriola, V0R 1X6

nickdoe@island.net

<https://nickdoe.ca./gabriola.html#coatsmarsh>

FROM Susan Yates to LTC
Gabriola Island Local Trust Committee
700 North Road
Gabriola Island, BC V0R 1X3

November 27, 2019

Re: Development of Ecological Protection Zone for Gabriola Islanders

Dear Trustees,

I am writing with regard to the staff report for the proposed Ecological Protection Zone, which will be on the agenda for the November 28/19 LTC meeting.

I support the recommendations as presented in the staff report, to develop an Ecological Protection Zone for the Gabriola Island Local Trust Area, and to rezone Burren's Acres Nature Reserve and Elder Cedar Nature Reserve to Ecological Protection (EP).

I want to thank the Local Trust Committee for keeping the proposed Ecological Protection Zone as a top priority, and thanks to the staff for recommending the rezoning to EP of Burren's Acres and Elder Cedar Nature Reserve.

However, I am very concerned that Coats Marsh is not recommended for this new EP zone. In my estimation this is the most significant area on Gabriola in need of environmental protection. Regardless of property lines and boundaries, the entire Coats Marsh wetland deserves the highest measure of environmental protection that can be afforded.

I am familiar with most species of amphibians, birds, small mammals, and riparian area plants that flourish in the Coats Marsh area. Some of them require undisturbed ground, water, shrub and tree areas for breeding, eating, and migratory rest stops. This means as little encroachment as possible by humans, dogs, horses, vehicles – all of which can negatively affect the sensitive wetland ecology of species who depend on this area for their specific habitat needs.

The Nature Trust of B.C., which holds the lease of Coats Marsh Regional Park along with the Regional District of Nanaimo, states its objective for this area as “conservation of critical coastal forest and wetland habitat on Gabriola Island”.

This objective is essential if we are to take a proposed Ecological Protection zone for Gabriola seriously, and I urge the Gabriola Island LTC not to abandon Coats Marsh Regional Park to the kind of recreational use that exists in all of our other parks, Regional and otherwise.

I ask that the LTC do whatever is required to afford the highest ecological protection to the Coats Marsh Regional Park, so that it becomes a prime example of what we can do as a community to give real and enduring meaning to ecological protection.

Susan Yates
500 Argyle Lane
Gabriola Island

From: Deborah Ferens, 387 Lyngail Place, Gabriola Island, BC V0R 1X1 to LTC

Re: Staff Report File No: Ecological Protection Zone X-ref.5690-20 (RDN Parks)
Nov 28, 2019 LTC Meeting

I support the Recommendations as presented in the Staff Report to develop a Ecological Protection Zone and to rezone Burren's Acres Nature Reserve and Elder Cedar Nature Nature Reserve as Ecological Protection (EP). I do thank the Trustees for keeping the Ecological Protection Zone as a top priority and for the excellent recommendation by staff for the rezoning of two significant nature reserves on Gabriola.

I do, however have 2 concerns.

First. In recommendation 3 a) create a new zoning designation entitled Ecological Protection (EP) which will regulate permitted uses, buildings and structures, height, siting requirements including setbacks and lot coverage, parking and subdivision.

I do trust that a new zone for ecological protection will not include any provisions for uses such as buildings, structures, lot coverage etc. My understanding is that an EP Zone must be for wild undisturbed spaces and not for people, buildings or recreational use.

Second. I am extremely distressed that Coats Marsh is not recommended for the new zoning designation. Despite ownership & management by the RDN in partnership with TNT, and the 2010 Management Plan which prioritizes recreational and conservation use in equal measure, it is time to call on all levels of government and protecting agencies to take truly transformative measures to prioritize conservation over recreation whenever there are opportunities to make bold moves in this direction.

All the current existing Gabriola parks are for people and human interests and that includes all our provincial parks, regional parks and community parks. We've got almost every conceivable representative park type and they are all for people's enjoyment, benefit and use. We have hiking trails, tennis courts, baseball diamonds, playgrounds, a golf course, a campground, we can access the beaches on all sides of the island for swimming, and seaside enjoyment. These parks aren't just for Gabriolans. We welcome and promote them to visitors from around the world

The protected land that Gabriola needs is for wild places - ecological reserves that do not permit any human activity or access, infrastructure of any kind, development or tourism, no blinds to peer at animals. What we need is significant nature reserves the sole intent of which is for wildlife habitat and undisturbed areas restricted to nature's sole domain.

Thank you for your consideration and the hard work you are doing.

GaLTT letter to the LTC declining to support giving Coats Marsh protection under the proposed Ecological Protection Zone legislation (P4)

November 27, 2019

Gabriola Island Local Trust Committee

700 North Road
Gabriola, BC VOR 1X3
November 27, 2019

Re: Ecological Protection Land Use Designation

Dear Trustees,

In principle, Gabriola Land & Trails Trust (GaLTT) supports the LT's initiative to establish a new Ecological Protection (EP) Land Use Designation for the purposes of protection of the natural environment, its ecosystems and biological diversity. Earlier this fall, GaLTT sent a request to the LTC for an opportunity to comment on the draft bylaw amendment once it is available. We look forward to reviewing the site-specific provisions which will be included in the draft amended bylaw.

Although the specific details of permitted uses for the proposed EP zone are not yet available, applying EP zoning to both Burren's Acres Nature Reserve and Elder Cedar Nature Reserve seems very appropriate given the primary intent of a nature reserve is to protect ecological attributes and features. We hope the site-specific provisions for Elder Cedar Nature Reserve will allow for continued low impact recreational use of this site.

We're inclined to agree with both the Regional District of Nanaimo (RDN) and The Nature Trust (TNT) that Ecological Protection zoning is not appropriate for Coats Marsh Regional Park (RP) given its adjacency with the 707 Community Park and the interconnectivity of the existing trail systems within the two parks. The current Coats Marsh Management Plan contains language that allows for restricted public access to environmentally sensitive areas within the park. GaLTT encourages the RDN and TNT to take actions that will provide greater protection to the marsh ecosystem itself and potentially to other sensitive park ecosystems and, after soliciting public input, to make appropriate updates to the current management plan. GaLTT has previously made specific recommendations to the RDN that at least two existing trails that lead to the edge of the marsh be closed to public access. It is our understanding that the RDN agrees with this proposed action.

Thank you for your initiative to establish a new Ecological Protection Land Use Designation for the protection of ecologically sensitive lands within the local trust area.

Rob Brockley
President, Gabriola Land & Trails Trust

Letter on sale of the “remainder” in Coats Marsh East involving construction of a driveway across East Path Creek and through its riparian area

Letter sent by e-mail May 18, 2020:

Yann Gagnon, Regional District of Nanaimo (RDN) Manager of Parks Services:
ygagnon@rdn.bc.ca

Rob Brockley, President Gabriola Land & Trails Trust (GaLTT): info@galitt.ca

Kees Langereis, Trustee Gabriola Island Local Trust Committee (LTC):
klangereis@islandstrust.bc.ca

Vanessa Craig, RDN Director, Chair Electoral Area B Parks & Open Spaces Advisory
Committee: vanessa.craig@rdn.bc.ca
Elaine McCulloch, RDN Parks Planner: EMcCulloch@rdn.bc.ca

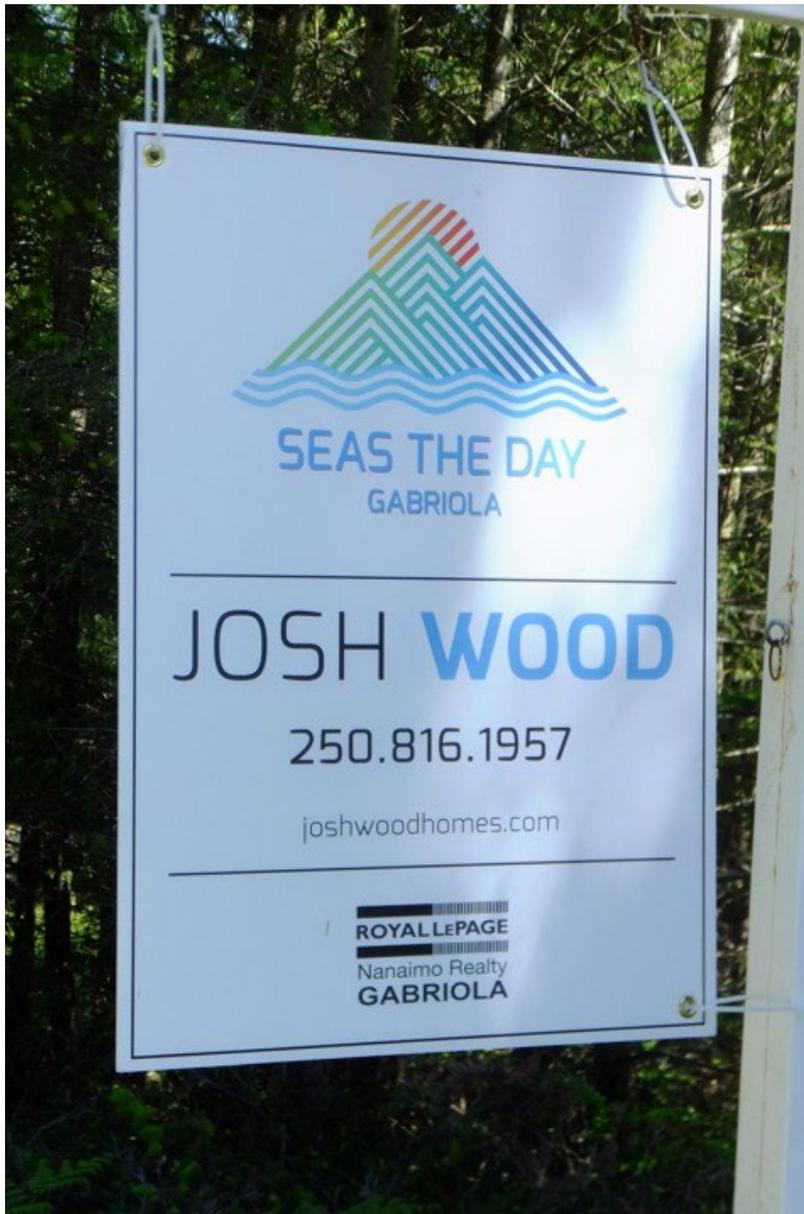
Coats Marsh RP and the issue of the Remainder in Coats Marsh East (temporarily part of the 707 CP) as a consequence of implementation of the Islands Trust GB-RZ-2016.1 Density Swap

Dear people

As I am sure most, if not all, of you will remember when the LTC accepted a proposal from Williams & Associates for a land density swap on Gabriola, one of the issues over which there was expressed consternation was that of the applicant's insistence on retaining 3.5 hectares and its single residential density in the Coats Marsh East parcel (W $\frac{1}{2}$ of NE $\frac{1}{4}$ Sec. 10). The applicant's reasoning for this was that the density swap arithmetic allowed for a 3.5 hectare "remainder". Previous LTC policy had not allowed for such retention. When the transfer of densities on forestry land were made *ca.* 2005 at the request of Centre Stage Holdings, a transfer that led to the creation of the 707 CP on Gabriola, the applicant was not allowed by the then LTC to retain this remainder and it subsequently became a part of the newly-created park.

When on the occasion of the third-reading regarding the necessary re-zoning called for by GB-RZ-2016.1 on March 30, 2017, all three trustees expressed their disappointment that this integral part of the Coats Marsh shallow-water wetland catchment area and the popular trail known as the Ridgeway was to be excluded. Trustee O'Sullivan remarked that "I am disturbed by this and it is a problem I would very much like to see remedied". Trustee Mamosa remarked that "The parkland, trails and connectivity is beneficial and she is heartened to hear that the remaining parcel is open to right of first refusal." And Trustee Chair Busheikin remarked that "She would prefer the proposal didn't exempt the remaining parcel".

The “right of first refusal” mentioned by Trustee Mamosa had been a topic of discussion prior to the final vote on the question. According to the minutes of the meeting the following was noted:



- the LTC wishes to secure this land for the benefit of the community due to its ecological importance;
- the applicant has expressed support for right of first refusal to an agency, group, or the RDN and, when donor lands are dedicated, a covenant can be placed that specifies this right to select groups, and a time period can be designated to allow the agencies time to vet the offer
- the Island Planner can provide further information regarding the RDN’s interest in right of first refusal through the upcoming meeting with the Parks and Open Spaces Advisory Commission.

So my question to recipients now is, given that the remainder is now festooned with surveyor's tape, including the driveway allowance that crosses East Path Creek on its way to and from the main body of the parcel and the road access at Stanley Place, and given that there is now a realtor's board on display there (photo attached), has the RDN, GaLTT, the LTC, or any other agency or group been given the opportunity to make an offer, if not why not, and if so what was the outcome?

Thank you.
Sincerely
Nick Doe

Letter on camping in the 707CP and impact on Coats Marsh riparian area.

Letter in File 759 (<https://nickdoe.ca/pdfs/Webp759.pdf>).

Gabriola Sounder, March 18, 2020, p.2

Letters relating to P4 protection of Coats Marsh, Gabriola Island, BC.

The following letters and responses are in File 761 (<https://nickdoe.ca/pdfs/Webp761.pdf>). The LTC decided to drop as a priority item creation of a P4 park zone which would have allowed for zoning where ecological protection would be paramount.

Gabriola Sounder, April 28, 2021, p.2 Letter by Nick Doe
Gabriola Sounder, May 19, 2021, p.4 Letter by Nick Doe
Gabriola Sounder, May 26, 2021, p.2 Letter by GaLTT
Letter to the LTC on the P4 topic by Susan Yates, January 22, 2021

Letters relating to Management Plan for Coats Marsh, Gabriola Island, BC.

sent by e-mail August 9, 2021

to Vanessa Craig, RDN Director from Nick Doe

cc GSK core group (its executive committee)
cc Guy Mireau (park neighbour)
cc Donna Thorvaldson (park neighbour)
cc Robert Brockley (GaLTT president)

hi Vanessa

Thank you for this response [e-mail August 7 concerning beaver dam] and I appreciate the work you have put into it. It is nevertheless a summary, not the actual detailed plan I would be interested in seeing.

It is a pity that updating the 2011-2021 Management Plan has not been done and that could have dealt with some of the issues your summary raises. I appreciate very much that full-scale re-visiting the plan would be expensive, but remain convinced that with the help of volunteers doing something would have been better than continuing to work without a plan. The plan was written at a time when not much was known about the ecology of the park or the hydrology of the lake and we have learned a great deal in the past decade.

It's worth remembering that some of the content of the existing plan was written based on a report by a consultant who visited the park from Vancouver Island for one day in the middle of winter in 2010. In the light of what we know now, some of the recommendations need to be immediately discarded and the history of the hydrology needs correcting.

Rather than reply point-by-point I have kept up-to-date my current field observation file <https://nickdoe.ca/pdfs/Webp673x.pdf> and added a "brief history" section to the lake-level summary file <https://nickdoe.ca/pdfs/Webp673b.pdf>. Any comments, other points of view, and criticisms (which I especially welcome) should be made understanding that the RDN Parks and TNT gives us on Gabriola little or no information on these topics on which to base an informed discussion.

Regards

Nick

sent by e-mail August 9, 2021

to Nick Doe from Vanessa Craig, RDN Director

Thanks Nick - I'll look at the information that's linked. I'd like to follow up afterwards and discuss the potential of you appearing as a delegation at an upcoming regional parks and trails committee to outline your concerns about the park. It will be challenging I think to request staff schedule an update for the management plan given all of the work already scheduled, but perhaps requesting that some of the recommendations re dog access and potentially addressing invasive species and human access to the wetland as outlined in the existing plan are implemented. Perhaps we could talk about this later in August?

Vanessa

sent by e-mail August 9, 2021

to Vanessa Craig, RDN Director from Nick Doe

Thank you Vanessa, that's kind.

I know I am in a minority, a small one, when it comes to conflicts between recreational use and nature conservation, but an opportunity to at least present the facts would be welcome. I did not know there was such a committee. I know CM RP is small potatoes and TNT appears to be uninterested in its conservation values, but as you might gather, it has been an important part of my life and it's a joy to watch species other than humans flourishing no matter how common-place elsewhere.

I have been a professional editor in my time, and could contribute volunteer time perhaps.

Nick

sent by e-mail August 10, 2021

to Vanessa Craig, RDN Director from Nick Doe

hi Vanessa

Just be talking to Guy Mireau and he had an alternative suggestion to my considering in my dreams re-writing the Coats Marsh Plan at no cost and with no staff and that is that you, he, I, and anyone else who could contribute get together soon at Guy's place and have a good discussion so that you at least in the RDN hierarchy know and have seen exactly what is going on. Guy and Cheryl would be very happy to host such a get-together. They have a fund of

useful knowledge about the marsh and experience of trying to work with the senior RDN Regional Park administrators.

Nick

sent by e-mail August 10, 2021

to Nick Doe from Vanessa Craig, RDN Director

Hi Nick,

Sure I'd be happy to attend such a get-together to get more information.

As this is an RDN regional park the focus is a regional focus, so even more so than a community park there is interest in wider consultation.

The RDN hires consultants to develop plans and doesn't rely on community volunteers. Typically a plan would involve a lot of upfront community consultation and then some opportunity on a draft. At the moment staff are over-extended and I don't anticipate will be tackling updates when there are some parks without any plans. In addition where there is a management plan in place where the identified actions haven't yet been addressed then there is less incentive to create a new management plan. The previous management plan had quite a bit of consultation.

My thoughts on a delegation (where you only have 5 minutes although you can submit a written document or slide show in advance that has more information) is for you to provide an overview of concerns and an "ask". Then I can make a Motion based on the ask. The next Regional Parks and Trails committee meeting is October 5th. If you appear in October then that has a chance of making it in to a 2022 work plan/budget - although with the new budget planning cycle that's getting a bit late unfortunately. While suggesting that the management plan needs to be updated could be one component, focussing on specific actions that have already been identified in the existing management plan would be more likely to occur sooner. We can discuss more in our meeting.

Perhaps we can have a set up a phone conversation for August to discuss a likely ask. Or perhaps combine it with the suggested meeting. Would the morning of August 23rd work for you? It would give us both time to think about the most useful "ask" for this time. After our conversation I'll talk with staff to get a feeling for whether coming to the RPTSC in October meeting is good or it might be a bit late -and if so if it might be better to come to the Board in September. The first Board meeting is September 7th. To get on the agenda you'd need to put in a request in the week of August 30th although supplementary information etc can be sent later.

Vanessa

sent by e-mail August 11, 2021

to Vanessa Craig, RDN Director from Nick Doe

Focusing on implementing the management plan as written misses the point. It proposes actions that would in the light of what we have learnt in the last ten years severely impact the marsh and make a mockery of any pretense that it is a nature reserve. Sections of the plan need to be scrapped not actioned. The reality too is that integrating the park into the 707CP as is being done was never part of the plan.

Nick

sent by e-mail August 11, 2021
 to Nick Doe from Vanessa Craig, RDN Director

That can be a focus of your comments then, with a requested action to implement parts that you are in favour of and updating the plan to address specific points that you find are out of date. Having targeted asks rather than a general ask of an update to the plan is more likely to be successful in terms of more immediate action, based on my knowledge of current demands on staff time.

It's more challenging to manage the marsh when the park has a boundary based on parcels rather than ecology I agree but that's the way the parks were put together and there is pre-existing connections between Coats Marsh and the 707 area. Where do you see it being integrated into the 707?

Vanessa

sent by e-mail August 12, 2021
 to Vanessa Craig, RDN Director from Nick Doe

[Where do you see it being integrated into the 707?]

1. Signage. Apart from the Stanley Place entrance sign there is nothing now to indicate to visitors anywhere that they are crossing from the 707CP into the CM RP. Even the gate posts on the Three Gates Path have been sawed off to the ground.
2. Signage again. The CM RP rules Section 3.3.5 in the Management Plan are ignored in the new signage being installed and the 707CP rules are being adopted instead.

As far as where the Management Plan needs revision, just looking at the OPERATIONAL ACTIONS section 3.5

Environmental Protection and Enhancement

1. [Complete Caretakers Agreement for 2011-2017 with outlined duties and responsibilities for resident caretaker, including regular water level monitoring in wetland area.]

All done. I've been doing monitoring on Christine McKim, a friend of mine's, behalf.

2. [Conduct structural assessment of existing concrete weir and environmental impact assessment of water level reduction and berm construction.]

Where's the environmental impact assessment on current operations? Is there one? and if so what does it say?

3. [Design and Install a vegetated berm along the west boundary of the Coats Marsh wetland area.]

Done. Good job except for the pond leveller being predictably too small. Weir deck used to flood in winter, but no significant consequences. Beaver dam has helped by slowing down flow of flood water into the weir pool.

4. [Restore log cabin on north edge of park to accommodate resident caretaker until 2017.]

Not relevant any more.

5. [Remove exotic invasive plants in forest and wetland and replant with native shrubs and trees.]

Not done, but any urgency confined to the burn-pile clearings which are artificial habitats and it's questionable whether any native species could compete with the exotics anyway. They make an interesting biodiverse area in their own right. I've counted more species of animals, plants, and

insects, native and exotic, in these clearings than anywhere else of similar size in the park. I've removed the blackberries myself after several years of cutting. There's nothing anyone can do about reed canary grass.

6. [Remove wire fence along north edge of wetland to allow wildlife access.]

Not relevant any more. The fence has decayed away by itself.

7. [Complete systematic inventory of park wildlife and plant communities]

On-going project of mine. Updated regularly. File <https://nickdoe.ca/pdfs/Webp679.pdf>.

Public Access and Circulation

1. [Remove barn at north end of park due to issues of public safety]

Done.

2. [Construct boardwalk across west end of wetland to provide pedestrian access between the north and south ends of the park.]

Incredibly bad idea. Should be scrapped. The south shore is used by breeding ducks and no access should be permitted.

3. [Develop parking area at Coats Drive for direct access to north end of park]

Not needed as far as I'm aware. CM RP is not an overly popular destination precisely because it is intended to be a nature reserve. In all the years I have been visiting the park I have never had a parking problem.

4. [Design and install a wayfinding system which includes maps at park entrances and signs along trails]

Underway, though signage content is bad and not informative..

5. [Install park benches at key locations along trails to designate rest stops.]

Not needed. Scrap the idea. This is not an urban park.

6 [Construct park shelter and picnic area at north end of park on old barn site.]

.Bad idea. Is this a nature reserve or yet another human recreational area? Make up your mind.

Education and Interpretation

1. [Facilitate a site assessment with Snuneymuxw First Nation for cultural artifact and area identification.]

Have the Snuneymuxw shown any interest? Tokenism?

2. [Provide neighbouring landowners with information related to invasive plant management through residential garden control by way of website and pamphlets]

Neighbours have shown great interest in the CM RP's well being. Not aware of any problem or the need for staff intervention.

3. [Install interpretive signage providing information on the park's ecosystem at key locations throughout the park]

Has been ignored. No stranger walking the park would know anything about its status vis-a-vis the 707 CP. Perhaps there isn't one.

4. [Install a viewing platform on the south side of the wetland to provide access to water for educational use.]

Incredibly bad idea. All of the wildlife on the lake is highly sensitive to human intrusion. Again is this a nature reserve or yet another human recreational area?

5. [Construct amphitheater seating area in existing clearing on north side of wetland as an outdoor educational facility.]

Scrap this idea. A nonsense suggestion by a consultant who visited the park for one day in mid-winter and does not live on Gabriola. GaLTT has shown no interest,

6. [Redevelop caretaker's cabin in 2017 as an education centre and classroom]

Not relevant any more.

ISSUES

1. Resolving the conflicts between the park being a nature reserve or yet another park for human recreation.
2. Making the east shore of the lake an integral part of protective regulation.
3. Recognizing the Coats Marsh East addendum as an integral part of the lake's ecosystem, not just another part of the 707CP.

Letters and articles on beaver dam in Coats Marsh, Gabriola Island, BC.

sent by e-mail April 7, 2020

to Nick Doe from Scot Merriam, SRM Projects

cc Vanessa Craig, RDN Director

cc Chris van Ossenbruggen, RDN Regional Parks Coordinator

Hi Nick, great chatting with you this morning.

As discussed, SRM has been retained by RDN to complete an inspection and risk assessment for the concrete weir at Coats Marsh. Your local knowledge, encapsulated in many online observation reports, has been very useful in characterizing the study area.

Thanks for your offer to reach out to the property owners on Coats Marsh Creek, downstream from the weir, to see if they are amenable to being interviewed and entertaining a brief property visit to inspect the location of the creek with respect to buildings and other infrastructure. Please have them contact me at 250-758-5352 at their convenience.

Best Regards,

Scot Merriam, P.Eng.

sent by e-mail May 1, 2020

to Donna Thorvaldson, park neighbour from Guy Mireau, park neighbour

cc Nick Doe

Hi, Donna and Nick,

Scott, and Chris from RDN, were here this morning around 9:30 and walked the creek and did an assessment at the weir

sent by e-mail July 22, 2021

to Vanessa Craig, RDN Director from Nick Doe

cc GSK core group (its executive committee)

cc Elaine McCulloch, RDN Parks Planner

Also forwarded to GSK members, GaLTT, and Rachelle Stein-Wotten, Sounder

Water Levels at Coats Marsh

There has been interest in water levels at the shallow-water wetland (the "lake") in the Coats Marsh Regional Park, something I have been monitoring on behalf of Gabriola Streamkeepers since 2015. The detailed reports of these measurements have over the years become lengthy and not easy to follow without spending time on studying them, so I have summarized the results in a new file attached. I will be keeping this file up-to-date and posting it at <https://nickdoe.ca/pdfs/Webp673b.pdf>.

The work of the beavers have been very beneficial in storing winter rain for use during drought conditions like the current ones. There are also spillways in their dam which help mitigate flooding of the weir deck in mid-winter.

I am anxiously awaiting the release of the RDN Report to the public (I have not been shown a copy), which is proposing an additional pond leveller be installed to alter what the beavers have done. I am curious to know, why it is considered necessary, what level it will be set at, and what considerations have gone into the effect of the new leveller on the ecology of the lake. In my opinion, based on just what I know at the moment and conversations with downstream residents along Coats Marsh Creek about the beaver dam, a new leveller is not necessary.

Of greater concern in my opinion is that the baffle at the weir is old and wooden (it used to be used to completely drain the lake into Hoggan Lake) and there should be a long term plan to replace it with something that is more secure.

sent by e-mail July 23, 2021
from Rachelle Stein-Wotten, Sounder to Nick Doe

Thanks, Nick. Are you referring to the [2020 weir assessment report](#)? I have also requested a copy of it.

sent by e-mail July 23, 2021
from Nick Doe to Rachelle Stein-Wotten, Sounder

It would have been in 2020 yes. The author was Scot Merriam of SRM Projects and the RDN contact would have been Chris van Ossenbruggen.

I was talking to Guy Mireau just yesterday, he lives at the western end of the park off Coats Drive, and he said he had had a lengthy discussion with Scot and had requested a copy but had had no response.

Donna Thorvaldson is his neighbour and Coats Marsh Creek runs through her property and would be impacted by any flooding. Both Guy and Donna have the marsh ecology in mind.

sent by e-mail July 26, 2021
from Vanessa Craig, RDN Director to Nick Doe
to GSK core group (its executive committee)
cc Elaine McCulloch, RDN Parks Planner

Water Levels at Coats Marsh

Thanks for your email and interest in Coats Marsh! I am a fan of beavers and their work too. Maintaining the ecological integrity of the marsh is key in my view. I will let Elaine and/or RDN staff address your specific questions and I'm interested in the response. I know that decision-making re. the dam/weir is informed by recommendations from engineers and decisions are made with marsh ecology and the potential effects on the surrounding residents in mind.

Vanessa

sent by e-mail August 4, 2021
from Bob Andrew, GSK core group to Nick Doe

cc Vanessa Craig, RDN Director
cc GSK core group (its executive committee)
cc Elaine McCulloch, RDN Parks Planner

I think we are all interested in their response.
Bob Andrew

No response from RDN staff has been received.

sent by e-mail July 29, 2021
to Vanessa Craig, RDN Director from Nick Doe

Water Levels at Coats Marsh

hi Vanessa

I see the RDN has proceeded to install a water-level gauge at the dam, in a position I might add that anyone reading it will have to walk on the dam causing disturbance to the wildfowl as I discovered for myself yesterday evening after a very long time of managing to monitor water levels without disturbance.

They also appeared to have siphoned off some water across the dam, where it has raised the level of the weir pool as at the moment the water has no access to the sill.

Re. consulting the residents, none of the residents that I have spoken to has any concerns about the dam, and Guy Mireau who lives at the west end the other side of the berm has fully agreed with me that the priority should be dealing with the old wooden baffle not messing with the water level in the lake. He has extensive experience in construction and talked at length to Scot Merriam when he was here on this.

I am, shall I put it, rather annoyed that the RDN has felt free to glean all the observational data they can over several years from Guy Mireau and myself, and yet make absolutely no response to requests for information about their plans, redacted if necessary. Couple that with POSAC's mandate not to deal with RP issues and its busy schedule anyway given that it meets so infrequently, I hope you can understand the frustration of the few of us feel that want to be a part of the management of what is among the most important ecological sites on the island.

Just for your information, I am keeping Rachelle Stein-Wotten of the Gabriola Sounder up-to-date on this issue. She has requested a copy of the engineering report, also without success.

Regards
Nick

sent by e-mail July 30, 2021
from Nick Doe to Rachelle Stein-Wotten, Sounder

Hi Rachelle

Having difficulty finding my good dam picture, I'll have another try today if i can't find it. Pictures show 1123 (view from the weir); 2132 beaver; 4614 dam from the north shore; 5488 existing pond leveller (too small to prevent flooding of weir before the beaver dam was built to present height); pied-billed grebe nest (on floating vegetation, one of the marsh inhabitants that will be affected by changes in summer water level); 1123 spillway (there are two or three of these in the beaver dam, they release water before the lake level reaches the crest which they never have since the dam was constructed); 1189 beaver 2.

sent by e-mail August 4, 2021
to Vanessa Craig, RDN Director from Nick Doe
to GSK core group (its executive committee)
cc Elaine McCulloch, RDN Parks Planner

The RDN are today draining the lake at Coats Marsh RP.

Nick

sent by e-mail August 4, 2021
to GSK members from Nick Doe

cc GaLTT board

The RDN are today draining the lake. No information from them as to what they are up to and why.

Nick

sent by e-mail August 6, 2021
to Nick Doe from Rob Brockley, GaLTT president

cc GaLTT board
cc GSK members

Thanks, Nick. I'm trying to get some information from the RDN about this. Yann Gagnon and Elaine McCulloch are both currently on holidays, so I've forwarded by email to Amy Gore and Mark Dodds. I'm awaiting a reply.

sent by e-mail August 6, 2021
to Rob Brockley, GaLTT president from Nick Doe

Hi Rob

... The RDN staff are refusing to release the report to anyone, including Vanessa, the SOUNDER journalist Rachelle, Liz Ciocea, and Guy Mireau, who lives just downstream of the weir, all of whom have asked for a copy, quoting "sensitive information" and you need to go higher up the chain of command to get permission to see it. It could not possibly be worse if the marsh were private property.

Nick

sent by e-mail August 6, 2021
to GaLTT board and others from Rob Brockley, GaLTT president

Some of you may have heard that the RDN has been lowering water levels in Coats Marsh over the past couple of days. Concerns have been expressed about these actions, especially as they are happening during the present hot and dry conditions. Here is the response I received from the RDN this afternoon.

Rob

Attachment

sent by e-mail August 6, 2021
to Rob Brockley, GaLTT and Amy Gore, RDN Superintendent of Parks Planning, Research and Development
from Mark Dobbs, RDN Superintendent of Parks Operations & Capital Projects

Hi Rob

Coats Marsh has been subject to fluctuating water levels over the years as a natural response to activity of beavers which occasionally impacts the ability of the weir to control water levels. A previous water control strategy involved placement of a Clemson Pond Leveler to try to counteract beaver activity at the weir itself. A functioning beaver dam, which could have been under preliminary construction as early as 2013, is elevating water levels above the outlet weir by a height of approximately 1.1 m in the wetland behind the beaver dam. While the beaver dam has been in existence for several years and has survived numerous winters with high water level events and is apparently stable, the RDN is exploring proactive measures to help moderate any potential flood risk associated with the beaver dam.

To help manage water levels proactively, the wetland level behind the beaver dam is currently being drawn down by approximately 40 cm to facilitate placement of a permanent siphon that will help maintain levels over the longer term closer to the elevation of the concrete outlet weir. Current wetland draw down is being done passively through the use of siphons installed by hand that require no machinery or harmful substances to operate. This is causing expected recharge of Coats Marsh outlet stream, but current siphon capacity is by far exceeded by flows commonly experienced over the winter months. Once wetland levels are low enough behind the beaver dam, a permanent siphon will be

installed later in the summer to move water over the beaver dam, without any direct impact to the beavers or the dam, to help manage water levels at or close to the pre-existing outlet weir elevation.

Current draw down work is occurring during a low-risk window to avoid any potential impacts to native wildlife, including red-legged frogs that are known to occur in Coats Marsh. A permanent siphon allows for storage of water above the beaver dam while the beaver dam remains structurally sound.

The work on-site is being carried out by Madrone Environmental Services with oversight by their Senior Aquatic / Terrestrial Biologist.

Regards

Mark Dobbs

sent by e-mail August 4, 2021

to Bob Andrew, GSK core group from Lisa Wg, GSK core group

cc Vanessa Craig, RDN Director
cc GSK core group (its executive committee)
cc Elaine McCulloch, RDN Parks Planner

What on earth are they doing that for...?!?!

sent by e-mail August 4, 2021

to Nick Doe from Marilyn Herarty, GSK core group

cc Vanessa Craig, RDN Director
cc GSK core group (its executive committee)
cc Elaine McCulloch, RDN Parks Planner

Hi all,

This action by the RDN, without consultation, needs to be addressed. Is anyone available to meet at Coats Marsh tomorrow to view what the impact of removing water this water is having on the marsh? I am certainly concerned and think if we have an understanding of what the impact is we can then contact the RDN to express our concerns. Since this is happening as I type this email I feel we must act immediately. I spoke with Nick and he is willing to meet anyone tomorrow that wants to visit the marsh. Let's try to make this happen. I am willing to go anytime tomorrow.

Cheers

Marilyn Heraty

sent by e-mail August 6, 2021

to GSK core group (its executive committee) from Nick Doe

cc Guy Mireau, park neighbour
cc Donna Thorvaldson, park neighbour
cc Derek Kilbourn, Sounder
cc Elaine McCulloch, RDN Parks Planner

Thanks to Gabriola Streamkeepers Marilyn and Bob, Residents Guy, and Donna, for the dam viewing yesterday.

I've added a note and photographs to my current field notes file <https://nickdoe.ca/pdfs/Webp673x.pdf>. Scroll for entry August 6, 2021.

sent by e-mail August 5, 2021
to Vanessa Craig, RDN Director from Bob Andrew, GSK core group
cc Guy Mireau (park neighbour)
cc Nick Doe

Hello Vanessa,

I and three others, met with Nick Doe to take a look at the siphons that the RDN has set up at Coats Marsh. It is quite alarming to see such a great quantity of water being withdrawn from the marsh. The estimate of withdrawal is 3" in a 24 hr. period. The deepest part of the marsh is estimated to be 1.5 to 2 M. which would put the time frame for draining of the marsh in very short order (a few weeks at best). Nobody present had any idea why this is happening. I would appeal to you to see if you can find out what is going on and make this public knowledge. It would be best, in my estimation, to have the draining halted until there can be some public discourse on this (unless it is an emergency- which doesn't seem to be the case).

Bob Andrew

sent by e-mail August 7, 2021
to Bob Andrew, GSK core group from Vanessa Craig, RDN Director
cc Guy Mireau, park neighbour
cc Nick Doe

Hello Bob,

Thanks for your email.

The Coats Marsh regional park is an RDN park co-owned by The Nature Trust (TNT). All work occurring in the park is done with the knowledge of TNT and is being overseen by a professional biologist. Like you I am concerned about the ecology of the marsh, so I followed up with staff about the project to get more information to pass along. I agree that it would have been good to more pro-actively get information out, but there will be an article in an upcoming Sounder I believe.

The wetland at the site is naturally occurring but water levels have been manipulated over many years in the past (prior to the area becoming a park) by draining (removing beaver dams) and flooding (when the concrete weir was installed).

In the years since the concrete weir was installed an industrious beaver has been at work creating a beaver dam. The creation of these dams occasionally limits the ability of the concrete weir to control water levels. To control

the water level build-up behind the beaver dam without disturbing the beaver, a pond leveller was installed in 2009. When the management plan for the park was completed in 2011, the pond leveller was identified as "inadequate". You can read more about the history of the management of the lands prior to becoming a park in the management plan here:

The continued work of the beaver means that the water level is now more than 1 m in height behind the dam. If the beaver dam was to breach, that significant built-up water would release, and would not be controlled by the weir, resulting in a possible failure of the weir and impacts to downstream infrastructure. To proactively address the water build up, the water level is being drawn down by approximately 40 cm by siphoning - the siphons were placed by hand and the siphon does not include the use of machinery or any deleterious substance. The work is being overseen by a biologist to ensure that the timing of the work and the rate of water removal will not adversely affect wildlife, including the Red-legged frogs known to live in the marsh.

The original plan was to install another pond leveller which would require placing another tube through the dam. I reported on this plan in previous Sounder updates in 2020 (the project was originally planned for 2020 but was delayed). Upon inspection of the dam, it was determined that the size and construction of the dam meant installing the pond leveller might be too damaging to the dam structure, so the approach was reconsidered. Once the water level has been drawn down using the temporary siphon, a permanent siphon will be installed later on in the summer with the objective of maintaining the water level at or close to the pre-existing outlet weir elevation, while still allowing water storage behind the dam and ensuring the dam remains structurally sound. So the marsh water level will be maintained at historic levels from when the concrete weir was installed. The siphon will need to be manually activated, based on monitoring of water levels which means that it will only be activated if water is building up behind the dam to a level that is higher than the weir.

I hope this information is helpful and addresses your questions.

Vanessa

sent by e-mail August 8, 2021

to Vanessa Craig, RDN Director

from Bob Andrew, GSK core group

cc Guy Mireau, park neighbour

cc Nick Doe

Thank you Vanessa. Very helpful.

Must admit that it does trouble me that you don't appear to have been informed along the way as to what was happening. Perhaps more concerning though is that no one on the island seems to have been consulted. The neighbours were perplexed and folks like Nick Doe, who arguably knows more about that marsh than anyone, was quite shocked to see such a program go forward with no island input. Seems there is a large piece missing in the process.

I don't think it is too late to rectify this and I hope the RDN and The Nature trust can please meet with some community members before they complete this program.

Thanks again,

Bob

sent by e-mail August 8, 2021
to Bob Andrew, GSK core group from Vanessa Craig, RDN Director
cc Guy Mireau, park neighbour
cc Nick Doe

Hello Bob,

I actually was aware that this was happening - I put updates in the Sounder a couple of times last year about the plan to install a second pond leveller and staff provided a few reports with updates. I didn't receive any comments when I put updates in the Sounder about the plan. The project was delayed due to covid.

I didn't know that they'd switched plans from a pond leveller to a siphon but that was quite recent based on an inspection of the dam and the execution of this is in line with the goals of installing a pond leveller.

Although a parks management plan is an important opportunity for public input as to the community's thoughts about the management for the park, once the management plan is in place then staff work on implementing it over the plan's term. The management plan indicated that the pond leveller even then was inadequate and the beaver has been working hard since then to build up its dam even more. This project is being undertaken to address risks associated with the water backup behind the beaver dam, which is in excess of the capacity of the concrete weir to control if the beaver dam was to fail - which also indicates that the current water level is above historic water levels from when the weir was constructed. Infrastructure maintenance and management and addressing risks is not typically something that would include public consultation.

As I mentioned, The Nature Trust has been kept fully informed throughout and the project is being overseen by a biologist to minimize detrimental effects to wildlife.

Vanessa

sent by e-mail August 8, 2021
to Vanessa Craig, RDN Director from Bob Andrew, GSK core group
cc Guy Mireau, park neighbour
cc Nick Doe

Thank you again Vanessa.

As the saying goes: "the price of democracy is vigilance". Clearly I did not see the earlier report in the Sounder. My apologies.

This being said, and reading the rationale for siphoning the marsh, I still think it would have been wise for the RDN and in particular The Nature Trust to have tried to get local input on the project. I am not a Biologist (although I do have a B.Sc. in Biology and have worked for several Biologists over the years and the modus operandi was always to get local input- both to make the task easier and fuller, and to help avoid any controversy from the local scene).

I will shut up now.

Bob

sent by e-mail August 10, 2021
to Vanessa Craig, RDN Director from Nick Doe

hi Vanessa

Just be talking to Guy Mireau and he had an alternative suggestion to my considering in my dreams re-writing the Coats Marsh Plan at no cost and with no staff and that is that you, he, I, and anyone else who could contribute get together soon at Guy's place and have a good discussion so that you at least in the RDN hierarchy know and have seen exactly what is going on. Guy and Cheryl would be very happy to host such a get-together. They have a fund of useful knowledge about the marsh and experience of trying to work with the senior RDN Regional Park administrators.

Nick

sent by e-mail August 11, 2021
to Vanessa Craig, RDN Director from Nick Doe

Just talked to Guy at the marsh. Apparently Trystan and Chris consider the syphon stopped working because it was sabotaged not because the drawdown was enough. I've just visited the east end of the lake in the 707CP and the area is devastated. Very little open water left and the shoreline has retreated far out leaving behind watershed that will I guess eventually rot in the sun. According to Guy, the RDN are intent on drawing the level down even further than they have. The claim that this is doing no environmental damage is ludicrous.

Nick

sent by e-mail August 22, 2021
to Derek Kilbourn, Sounder from Nick Doe
cc Rachelle Stein-Wotten, Sounder

Sunday evening: The draining of Coats Marsh wetland by the RDN continues unabated, a smell of rot in the air, open water is breaking up into ponds, and Coats Marsh Creek is running inky black as the siphons dredge up gyttja.

Ducks are abandoning the reedy margins that are drying out and the beaver is struggling to find water deep enough for it to swim in.

Nobody else around.

Attachments



sent by e-mail August 24, 2021

to GaLTT board
cc Nick Doe

from Rob Brockley, GaLTT president

FYI

Attachment

sent by e-mail August 24, 2021

to Yann Gagnon (RDN)
cc Vanessa Craig, RDN Director

from Rob Brockley, GaLTT president

Hi Yann -- I received the attached photo this morning as well as emails from several different people raising concerns about the amount of water that has been drained, and continues to be drained, from Coats Marsh. I understand RDN's downstream liability concerns caused by higher water levels to some extent and the need to find an effective way to stabilize water levels in the face of continuing beaver activity. However, I also fully understand concerns raised by many Gabriolans about the impacts lower water levels will have on the Coats Marsh ecosystem, especially with the rapidity in which the changes are occurring. That this is happening during a prolonged and severe drought is of particular concern. Important wildlife habitat that has been created during the past few years due to slowly rising water levels is being severely impacted by current actions. How much has the marsh been lowered to date and how much more lowering of water levels is planned? Most importantly, has the Nature Trust of BC been consulted about this project and are they in agreement with the actions taking place?

Rob Brockley



sent by e-mail August 27, 2021

to Vanessa Craig, RDN Director and LTC trustees

from Phyllis Reeve, park neighbour

As a near neighbour of Coats Marsh Regional Park, I am concerned about reports of intervention to control water levels. At the end of the brief and quiet trail, the Marsh always comes as a revelation and a gift.

Please let us proceed with extreme caution, do no harm, and consult continually with the resident wild life. To quote Nick Doe, who has been monitoring the Marsh for years: "by raising the level of winter rain storage, thereby greatly reducing any possibility that the wetland will dry out in summer, the beavers have created a vibrant all-season wetland ecosystem of a kind we are all constantly encouraged to preserve and protect."

sent by e-mail August 28, 2021
to Nick Doe from Vanessa Craig, RDN Director
to Guy Mireau, park neighbour

Hello both,

Thanks again for taking the time with me the other day. [August 21]

I did follow up with the Nature Trust. They are aware of and have been consulted about the project. In addition, since the work has occurred they have visited the marsh to assess it. They confirm that although the draw down seems to have drained the marsh, that's not the case and the marsh remains quite large. The edges of the marsh are quite shallow and drawing it down has exposed matted vegetation which is obscuring the wetted edge. The vegetation will die off over the fall/winter and the riparian edge and vegetation will adapt.

The Nature Trust personnel feels that overall, the marsh will still provide suitable habitat for amphibians, waterfowl and breeding birds etc which will adapt to the changed conditions. In addition the trees along the marsh edge that died due to the increased water level will provide nesting habitat and will eventually provide downed wood habitat for wildlife as they fall. They have gone through this process at a different marsh for similar reasons (lowering water level due to risk to downstream properties/infrastructure) and found that the marsh showed no decrease in amphibian productivity, and continued to show high waterfowl/passerine bird use.

They also shared a few aerial [drone?] photos of the marsh which I've attached for your interest.

Vanessa





sent by e-mail September 2, 2021
to Vanessa Craig, RDN Director from Nick Doe
to Guy Mireau, park neighbour

Hi Vanessa

Thank you for respectfully and attentively listening to our views on the way the RDN are managing the marsh and failing to keep everyone interested informed of their intentions.

Appreciated, but as we said, it is being handled by the RDN Parks people in a way that is in no different than if it were private property. TNT's visit unbeknownst to anyone but the RDN Parks people just fits that mode.

I have attached my comments to TNT's assessment, but have not consulted Guy as he is away on family business.

As you can see, I remain completely unconvinced that this is necessary and am resentful that no technical information about the project is forthcoming from the RDN.

Nick

Attachments My comments in red.

I did follow up with the Nature Trust. [meeting on site August 21 with Guy Mireau and myself]
They are aware of and have been consulted about the project. [unlike us on Gabriola]
In addition, since the work has occurred they have visited the marsh to assess it.

They confirm that although the draw down seems to have drained the marsh, that's not the case and the marsh remains quite large. [by my modelling, the surface area has dropped 13%, the volume 30%, and the average retreat of the shoreline has been 8.9 m. Presumably RDN has a more accurate professional-grade model of the wetland. Drying-out is, in fact, easy to see as the watershed dies quickly once water depth is less than a foot (0.3 m), but it is true the watershed may look like land in photographs.]

The edges of the marsh are quite shallow [no, the whole wetland is quite shallow] and drawing it down has exposed matted vegetation which is obscuring the wetted edge. The vegetation will die off over the fall/winter and the riparian edge and vegetation will adapt.
[as a consequence of the reduced depth overall, we know from pre-2015 observations that the watershed (*Brasenia schreberi*) will adapt by covering the whole surface of the wetland in summer leaving no open water. The implication that it will be the same only smaller is wrong.]

The Nature Trust personnel feels that overall, the marsh will still provide suitable habitat for amphibians, waterfowl and breeding birds etc which will adapt to the changed conditions.

[this ignores the improvements made to the ecosystem as a consequence of making available open water in summer and more resilience in the face of summer-long droughts. More species of waterfowl use the wetland than ever before. Breeding birds that may well be affected by the changed conditions include hooded mergansers, blue-winged teals, wood ducks, and pied-billed grebes.]

In addition the trees along the marsh edge that died due to the increased water level will provide nesting habitat [? this benefit exists already. It does provide such habitat, as is and increasing the distance between the water and the snags is not going to help those ducks that often use the

snags for protection of their ducklings from predators, mainly bald eagles.] and will eventually provide downed wood habitat for wildlife as they fall.

They have gone through this process at a different marsh for similar reasons (lowering water level due to risk to downstream properties/infrastructure) [was the protected infrastructure worth about the price and annual insurance of a single modern vehicle, and what level was the risk compared to the perfectly stable, vegetated, dam at Coats which is in a very low-energy environment] and found that the marsh showed no decrease in amphibian productivity, and continued to show high waterfowl/passerine bird use.

They also shared a few aerial photos of the marsh which I've attached for your interest. [note the clear water that will not exist next year].



sent by e-mail September 8, 2021

to GaLTT board

from Rob Brockley, GaLTT president

Hi all -- At our Conservation Committee meeting yesterday, I was asked to write a letter to The Nature Trust of BC (co-owners of Coats Marsh Regional Park with the RDN) to express our concerns about ongoing work being undertaken by the RDN to lower marsh water levels to address liability concerns. Earlier this morning, I sent the attached letter to TNT with copies to our two Trustees and Vanessa Craig (RDN Director).

Rob

Attachment

** Sent via electronic mail to info@naturetrust.bc.ca **

September 8, 2021

Dr. Jasper Lament

Chief Executive Officer
The Nature Trust of BC
500-888 Dunsmuir Street
Vancouver, BC V6C 3K4

Re: Coats Marsh Regional Park Drainage Issues

Dear Dr. Lament:

I am writing on behalf of the Gabriola Land and Trails Trust (GaLTT) to voice concern about recent activities at Coats Marsh Regional Park on Gabriola Island where water levels of the marsh ecosystem are being significantly lowered by the Regional District of Nanaimo (RDN).

I've contacted the RDN twice about this issue and have received some useful background information and project rationale from Yann Gagnon (Manager, Parks Services). However, as the co-owner of Coats Marsh, I want you to know we still have serious misgivings about this project and the effects it is having on the marsh ecosystem and on the valuable wildlife habitat it provides.

As you likely know, the water level in Coats Marsh has been slowly rising in recent years due to beaver activity. In 2020, the RDN hired a Professional Engineer to assess the condition of the existing concrete weir at the marsh outlet and to recommend remedial actions. According to the RDN, the report confirmed the water level behind the beaver dam was approximately 1.1 m above the height of the weir. Although the dam is in good condition, there is apparent concern that a sudden release of water caused by a future breach in the dam could possibly result in the failure of the weir and downstream damage and liability issues. As a result, the wetland level behind the beaver dam has recently been drawn down by approximately 40 cm to facilitate placement of a permanent siphon that will help maintain levels over the longer term closer to the elevation of the concrete outlet weir.

GaLTT is somewhat sympathetic to the potential liability issues caused by the elevated water levels behind the beaver dam and the need to find a solution that will stabilize water levels over the long term. However, we share the concerns of many other Gabriolans about the harm the current actions are having on the marsh ecosystem. GaLTT is especially alarmed about the rapidity of the draw down and the fact it is occurring during a period of prolonged and severe drought and high summer temperatures.

The RDN has assured me the current actions are being guided by an environmental plan prepared for the project and that the work schedule was specifically timed to coincide with a low-risk window to avoid any potential impacts to native wildlife. I've also been told the work is being supervised by a Registered Biologist and that TNT participated in the planning and have had an opportunity to review and comment on the project.

An 'eye test' of the outcome of lowering water levels by GaLTT and others raises doubt about assurances that environmental impacts to the marsh will be minimal. After 40 cm of draw down, the effects on the marsh perimeter are already very visible. Apparent plans to lower the water level a further 70 cm to attain, and maintain, the approximate level of the outlet weir will undoubtedly result in further loss of valuable marsh habitat.

If you haven't already done so, I urge you to have a TNT staff member visit the site and view the results first-hand. Gabriola Island has very few large wetland ecosystems, so the responsible stewardship of Coats Marsh is especially important. The beavers have done a masterful job of improving wildlife habitat at Coats Marsh in recent years and it is disheartening to see their efforts being deliberately dismantled.

We remain hopeful that an effective, but less environmentally damaging, compromise can be reached. GaLTT is a charitable, non-profit society focused on protecting Coastal Douglas Fir ecosystems on Gabriola and nearby islands, developing and maintaining a network of public trails, and providing public education and awareness of outdoor recreation and conservation issues. Our conservation work includes advocacy, land acquisition and conservation covenants. We have built a respectful working relationship with the RDN, Islands Trust Conservancy, and BC Parks on a range of conservation and trail issues.

Sincerely,
Robert Brockley
President, Gabriola Land and Trails Trust
cc: Kees Langereis, Islands Trust Trustee, Gabriola

Scott Colbourne, Islands Trust Trustee, Gabriola
Vanessa Craig, RDN Director, ElectoralArea 'B

sent by e-mail September 13, 2021

to Rob Brockley, GaLTT president from Nick Doe

cc Vanessa Craig, RDN, Scott Colbourne, LTC, Kees Langereis, LTC

hi Rob

Excellent letter to TNT on behalf of GaLTT regarding management of the Coats Marsh shallow-water wetland, commonly though technically incorrectly, called a "lake".

I have still not seen any of the "plans" the RDN has made so am unable to comment on them directly, but I did observe in your letter that the RDN has read or interpreted Scot Merriam's report to say that the water level on the upstream side of the dam (the lake) has reached 1.1 metres above the "height of the weir". This is not true.

As far as I know, the RDN has no historical data on this level. They once-a-month took photographs of the gauge at the weir on the downstream (the weir-pool) side of the dam, but neither Guy Mireau nor I am aware of any gauge of theirs on the upstream side until one was installed a few weeks ago.

When I talked to Scot at length in May 2020, I gave him my observations of the upstream-side level I have been making since 2015 at the far east end of the lake. These recordings are in my file <https://nickdoe.ca/pdfs/Webp673b.pdf> and you can see from these that the highest level is around 0.7 metres, not 1.1 metres.

However, the hydraulic head of the dam (the difference between the up- and downstream water levels) does reach 1.1 metres, but although this peaks in late-summer, it is because the downstream-side level has fallen, not because the upstream-side has risen. Moreover, the 1.1 metres at this time does not reflect the pressure on the dam because the water in the weir pool in late-summer retreats away from the base of the dam leaving well-vegetated dry-land behind to act as a buttress.

Another issue here besides the main point of this e-mail is that Scot Merriam dismissed the rotting of the weir baffle as not a concern because it is wet while apparently, I have to guess, not considering failure of the dam which will be hastened if it is forced to dry out. The failure of the baffle would completely drain the marsh, not just lower its water level, as it has done in the past. Both Guy and I have been very concerned about this for some time.

It is a small point maybe, but who knows what other errors, if that is what this is, may exist in their internal plans through their lack of accurate year-round hydrological and ecological observational data, data that is freely available from interested Gabriolans who live here and are able to make such observations at no expense to the RDN.

Thank you for your expressing your concerns.

Nick Doe

result of informal enquiry

As of September 19, 2021, GaLTT had not yet received a reply to their letter addressed to Yan Gagnon, RDN, August 24, 2021 or to their letter addressed to Jasper Lament, TNT, September 8, 2021.

sent by e-mail September 28/29, 2021

to list incl. GaLTT, RDN, LTC, Sounder

from Nick Doe

Looks like the resident beaver has abandoned the site. Not been seen for some time. New siphon installed and draining continuing.

Attachment



sent by e-mail October 5, 2021

to GaLTT board

from Rob Brockley, GaLTT president

FYI, a response from Nature Trust of BC re my September 8th letter.

Attachment

to: Rob Brockley

from Tom Reid (TNT, West Coast Conservation Land Manager)

Tuesday, October 5, 2021

Subject: Coats Marsh Regional Park

Good morning Robert,

Thanks for reaching out to the Nature Trust of BC (NTBC) regarding your concerns about Coats Marsh and the recent work being undertaken by the Regional District of Nanaimo.

For background purposes, when NTBC acquired Coats Marsh in 2008 our management goals for the site were to maintain the wetland area and associated SEI polygon to the approximate 2008 water levels. At the time of acquisition the existing concrete weir controlled the elevation of the wetland and in

response to beaver activity at the weir causing flooding of adjacent private property we installed a Clemson Pond Leveller in 2009 with the goal of maintaining a reasonable water elevation, allowing the beavers to continue to thrive in the wetland and to reduce the risk of flooding to neighbouring properties.

In 2013 a berm was constructed to further contain high water flows from entering onto neighbouring properties. However, due to increased beaver activity from 2012 to 2020 the wetted area of the marsh expanded from approximately 42,000m² to 55,000m² which prompted the RDN to undertake assessments to try and identify options to continue to meet our goals for the property while reducing risk to downstream properties and infrastructure. This work occurred over 2020/2021.

NTBC reviewed both the environmental assessment and the water management/engineering reports and feel that the proposed siphon and active management of the siphon will allow us to maintain the ecological features of Coats Marsh while reducing downstream risk. One thing that is important to note is that the design of the permanent siphon system includes the ability to turn it off/on which allows for flexibility in the management of the water levels at Coats Marsh; including the ability to hold more water in the wetland area above the beaver dam if conditions permit (e.g. structurally sound) while allowing for safety releases as necessary.

In terms of a site visit, I visited the marsh on August 25th to inspect the marsh and to capture aerial imagery of the wetland (attached); this occurred following a 2 week drawdown of the wetland to facilitate the testing of a siphon system and to aid in the installation of the siphon system itself. I can understand how on first impression it is shocking to see the marsh being drawn down to levels of a few years ago. However from an aerial perspective you can still see that the overall wetland is still quite large. The wetted edge is obscured by abundant growth of vegetation that has formed dense mats now that the water level is dropping; this vegetation should die off into fall and winter and the vegetation will adapt to changing growing conditions as will the riparian edge.

Overall the ecological function of the marsh should not be impacted in the long term by the draw down and efforts to maintain a set water level. The amphibians, waterfowl, invertebrates, breeding birds etc..will adapt and there should not be a loss in productivity. Additionally with the increased water levels that have occurred over the last few years there is now a perimeter of standing deadwood, which over time, will provide cavity nesting habitat for breeding birds as well as foraging habitat for woodpeckers etc. This standing deadwood will eventually fall into the marsh creating additional amphibian and waterfowl habitat.

We went through a similar process at Dudley Marsh in Errington a few years ago. Water levels were too high and posed a risk to downstream properties. Over time we reset the control structure and conducted a water drawdown similar to Coats Marsh. Subsequent monitoring has revealed no overall impact to amphibian productivity and we are still seeing high waterfowl/passerine bird use along with other wildlife species.

Let me know if you any further questions. Please feel free to contact me directly.

Cheers,

Tom

GaLTT via electronic mail to tosborne@rdn.bc.ca
October 28, 2021

Dr. Tom Osborne
General Manager, Recreation & Parks
Regional District of Nanaimo
6300 Hammond Bay Road
Nanaimo, BC VgT 6N2

Re: Coats Marsh Regional Park Weir Repair/Replacement

Dear Mr. Osborne:

I am writing on behalf of the Board of Directors of Gabriola Land and Trails Trust (GaLTT) to express our support for the motion being brought to the November 2, 2021 meeting of the Regional Parks & Trails committee by Vanessa Craig (RDN Director, Electoral Area B) to advance the planning for assessing weir repair or replacement options at Coats Marsh Regional Park. If approved, the motion will amend the Five-year Financial Plan for Regional Parks so that planning for the weir project will begin in 2022 followed by necessary repair/replacement work in 2023. The motion also asks that the planning phase also explore the feasibility of expanding the weir to enable increased water storage capacity of the marsh.

I have previously voiced GaLTT's concerns about the recent manual drawdown of water levels in Coats Marsh Regional Park to both the RDN (Yann Gagnon, Manager Parks Services) and the Nature Trust of BC (Dr. Jasper Lament, Chief Executive Officer). We've been told the drawdown is necessary to mitigate apparent liability and damage concerns posed by the elevated marsh water levels caused by beaver activity in recent years. We've also been assured the work is being guided by an environmental plan prepared for the project and supervised by a professional biologist. However, while they may have successfully mitigated liability, we remain concerned the engineering assessments and remedial actions taken to date have not properly prioritized the high ecological values of the marsh and the effects lower water levels will have on the important wildlife habitat it provides.

The Coats Marsh property was acquired by the RDN and the Nature Trust of BC in 2008 for its conservation values. We believe the preservation or enhancement of those conservation values should form the basis of all management decisions.

Gabriola Island has very few large wetland ecosystems, so the responsible stewardship of Coats Marsh is especially important. The beavers have done a masterful job of improving wildlife habitat at Coats Marsh in recent years and it is disheartening to see these gains being reversed by the manually lowering of marsh levels in recent months. Therefore, it is imperative that planning to assess repair/replacement/expansion options be expedited so that water levels may be safely managed at levels which protect or enhance conservation values.

Finally, the public concerns raised about the recent water drawdown at Coats Marsh underscores the importance of expediting a thorough review of the current Management Plan 2011-2021 for Coats Marsh Regional Park. Ideally, the weir repair/replacement planning should be done within the context of a full Management Plan review.

GaLTT is a charitable, non-profit society focused on protecting and restoring natural ecosystems, providing opportunities and resources for landholders and the public to explore and learn about the natural environment, establishing and maintaining a network of trails, and encouraging responsible land and water stewardship practices. We have built a respectful working relationship with the RDN, Islands Trust Conservancy, and BC Parks on a range of conservation and trail issues.

Please ensure this letter is included as correspondence on the Regional Parks and Trails Select Committee agenda scheduled for November 2nd.

Robert Brockley
President, Gabriola Land and Trails Trust
cc: Vanessa Craig, RDN Director, Electoral Area 'B'
Tom Reid, Nature Trust of BC, West Coast Conservation Land Manager
Kees Langereis, Islands Trust Trustee, Gabriola
Scott Colbourne, Islands Trust Trustee, Gabriola

sent by e-mail October 31, 2021

to Tom Osborne, RDN General Manager of Recreation and Parks from Nick Doe

cc Vanessa Craig, RDN: GaLTT board: Kees Langereis, LTC: Guy Mireau, park neighbour.

Dear Dr. Osborne

I am writing to you concerning the shallow-water wetland in the Coats Marsh Regional Park on Gabriola Island, a topic which I understand may be an agenda item for the meeting of the Regional Parks and Trails Select Committee on November 2, 2021.

By way of introduction, I have interested myself in the park ever since the RDN and NTBC acquired it in 2008. I contributed some basic geological data and comments specific to the wetland for the 2011-2021 Management Plan. Since then, I have researched, written, and published articles on the wetland's hydrogeology, the park's fauna and flora including maintaining a species inventory; regularly monitored rainfall, creek flows, and the wetland's water levels starting in 2015; kept an informal and on-going "Field Observations" account for the marsh, now comprising fourteen illustrated on-line files; noted the effects of human disturbance on the wildlife; written about the ecological integration of the wetland with the wetlands and water courses to the east now part of the 707CP and beyond; expressed opinions from time-to-time on management of the park; and I also provided data to Scot Merriam from Sustainable Resource Mechanical Engineering and Project Management who reported on the status of the weir and beaver dam at the western end of the wetland following a visit to the site in May 2020.

Although much of this work was done as a member of the Gabriola Streamkeepers group, this letter is being sent on my own initiative. Over the years I have had regular contact with Mr.

Guy Mireau and his wife who own [REDACTED]² adjacent to the western end of the wetland, and I have his permission to include remarks attributable to him.

I will say at the outset that I strongly support any move by the committee to advance the planning for assessing weir "repair or replacement" options (I would prefer myself "renovations") at Coats Marsh Regional Park for reasons I am sure will be explained by Vanessa Craig, the RDN Director for Electoral Area B who has visited the site and had discussions with the only residents whose property might be impacted by a simultaneous failure of the beaver dam and concrete weir.

In my strongly held opinion, the work being done on a temporary basis by RDN staff to lower water levels of this shallow-water wetland is both unnecessary and has been damaging to its ecology. The ecology of the wetland cannot be fully assessed without at least one full year of observations to allow oneself to become familiar with the rhythms of its hydrology and its aquatic, parafluvial, and riparian environments. Currently, neither of the two most numerous duck species (ring-necked ducks and buffleheads) that are the usual winter residents of the wetland have appeared.

It would be my contention that the reliance in the soon-to-expire 2011-2021 Management Plan on observations and comments made by an off-island consultant for two days in the winter of 2010 has led to the urgent need for the plan to be revised, and that contrary perhaps to other opinions, such a revision based on what we all have learned about the ecology of the wetland and its sensitivity to human disturbance in the past decade, could well result in the removal, not the addition, of items requiring staff time and expense. I have heard nothing to suggest that the main management objective for the Coats Marsh Regional Park property should be altered which is, I quote, "... is as identified by the Ecological Gift's program, the TNT/RDN Lease Agreement and community consensus, environmental conservation".

I am forced to refrain from a detailed commentary on the current operations concerning the wetland in the park by a dearth of information from the RDN Parks Department on the rationale for these operations and details on their various plans said to be in place. No information has been forthcoming as to these plans beyond ill-informed platitudes and generalities, this despite several requests for what should, I would have thought, be information readily available about what is essentially public property to taxpayers, their elected representatives, local residents, journalists, volunteer and nonprofit societies, and interested citizens who live on Gabriola. You must forgive me if I sound angry, that is because I am.

May I add that, as I am sure is well-known to you and the other committee members, the evaluation of the risk of any event has two equally weighted components, namely, the probability of the event occurring, and the cost should that event occur. On both counts, these components in this instance are low or very low. The priority should not be, in my opinion, on temporary fixes but on development of a strategy for dealing with the now decades-old weir and its wooden baffle on a sustainable and low-maintenance basis while enhancing and conserving the wetland' environment as much as is feasible within the constraints imposed by

² RDN redactions.

the fact that some of the historical natural boundaries of the wetland and its headwaters lie outside the regional park.

Academic studies at the University of Exeter of the stability of beaver dams in the UK since beavers were re-introduced there in 2014 have found that "...hydrological monitoring across beaver sitesthroughout Britain ...has been undertaken, and complete failure of established dams has rarely been observed. On 1st to 3rd order channels [the Coats wetland is fed by 1st order and very low energy channels], dams are commonly stabilized by vegetation, over time becoming an integral component of the landscape". I will just add that the height of the beaver dam has remained stable for the last three years; the beaver has established three spillways through the top of the dam to prevent high water breaching it; and there has been no winter flooding of the deck of the weir in the last three years such as regularly occurred in earlier times.

To the second component of a risk analysis, the owner of [REDACTED] believes that the liability issue has been grossly exaggerated by RDN Parks and is adamantly against the work that is being done to reduce water levels on account of the ecological damage it is doing. Some of this damage will not be apparent until next summer, when on account of the wetland being shallower, the aquatic plant watershield, which has roots in the bed of the wetland, will come to completely cover the surface with no open water left. Species that require open water for take-off will no longer be there. We know this to be a fact because this is how it was a decade ago before the beaver dam was built.

So, please support the idea of advancing open-ended transparent discussion of what to do about the need to renovate the weir. This weir was originally built to completely drain the wetland, which if it happened again, would be an environmental catastrophe from which the wetland would probably take many years to recover..

Respectfully yours

(signed) Nick Doe

sent by e-mail November 3, 2021

to Nick Doe from Tom Osborne, RDN General Manager of Recreation and Parks

cc Vanessa Craig, RDN: GaLTT board; Kees Langereis, LTC: Guy Mireau, park neighbour; Yan Gagnon, RDN Manager of Parks Services; Mark Dobbs, RDN Superintendent of Parks Operations & Capital Projects; Tom Reid, NTBC West Coast Conservation Land Manager.

Dear Mr. Doe,

At the RDN Regional Parks and Trails Select Committee held yesterday, November 2, 2021, your letter was received and the Notice of Motion from Director Craig was then later supported by the Committee as follows:

"That the Five Year Financial Plan for Regional Parks be amended to include planning for the repair or replacement of the weir at Coats Marsh Regional Park including considering increasing storage capacity of the weir and related water control structures in 2022, and that during the 2022 budget process the Board consider including the repair or replacement of the weir and related structures in 2023."

This Committee recommendation will now go to the RDN Board for consideration and included in the 2022 Budget and Five Year Financial Plan process as part of the development of the budget for the RDN's Regional Parks Service.

Thank you for your wetland stewardship input and observations of Coats Marsh Regional Park over the years.

Regards,
Tom Osborne

sent by e-mail November 3, 2021

to Vanessa Craig, RDN Director
to Yan Gagnon, RDN, Manager of Parks Services
to Tom Reid, NTBC, West Coast Conservation Land Manager
to Rob Brockley, GaLTT President
to Guy Mireau, park neighbour

from Nick Doe

Coast Marsh beaver dam failure

The usual quantitative assessment of risk in engineering analyses is the numerical product of the probability of an event occurring, and the cost that would occur if it did. In my recent letter to the RDN Parks department, I pointed out that in the case of the surmised failures of the beaver dam and weir, both the probability of failure of the dam and and the damage that would ensue if it did are low making an assessment of the the overall risk itself very low.

In the interests of getting a handle on the probability of the dam failing in its entirety, as I can only suppose is included in the RDN Parks department's confidential engineering reports that I have not seen, I recently contacted Richard Brazier, Professor of Earth Surface Processes at the University of Exeter in the UK, describing the dam in Coats Marsh and asking for an up-to-date of his comment in an academic paper published in 2019 to the effect that catastrophic failure of beaver dams in well-established, low-order channels is rare. Professor Brazier has been researching beaver dams and a wide range of other aspects of beaver impacts on hydrology, ecology, society etc... since 2013.

Contained in his detailed response was the following:
"Considering the system that you refer to - which is a low energy lake system, in my opinion, especially given the maturity of the dam, the chance of any catastrophic failure is non-existent."

Nick Doe

August 20, 2022

RDN finally made public the report by Scot Merriam, *Coats Marsh Weir Assessment*, June 1, 2020. [File: 699](#).

sent by e-mail August 23, 2022

to GSK core group (its executive committee)
cc Vanessa Craig

from Nick Doe

The RDN have finally put into the public domain the oft-requested report of the beaver dam assessment conducted in 2020. It can be found on the RDN Website but to make sure it does not disappear again I have posted it at <https://nickdoe.ca/pdfs/Webp699.pdf>. It is a very large file on account of the numerous pictures.

The on-going detailed situation can be found in the field observation reports, currently <https://nickdoe.ca/pdfs/Webp673z.pdf> and my CM RP correspondence file <https://nickdoe.ca/pdfs/Webp680.pdf>.

The "lake" in the RP is currently in great shape and the siphoning has been on hold during the summer. The beaver has not been seen for a while but there is evidence it has been very busy maintaining its dam.

An RFP (request for proposal) has been issued by the RDN for renovation of the weir. I'm not particularly happy with it but comments welcome.

sent by e-mail August 26, 2022

to Nick Doe

from Jordan Vander Klok (Parks Planner RDN)

I'm writing to introduce myself and to reach out regarding Coats Marsh. I am the RDN Parks Planner for community parks on Gabriola, and I have also recently taken on the Coats Marsh file. I understand from my colleagues and from your website that you have extensive knowledge of the park.

The RDN is in the process of planning for the repair or replacement of the existing weir. We have recently hired a consultant team to evaluate our options and provide a recommendation for the ideal elevation of a new (or refurbished) weir. Our primary considerations are the costs and impacts of construction, environmental implications, and long term hydrological risks.

I would welcome your input on this topic. If there are any specific files from your website that you would like the consultants to be aware of, or if you have any questions about the project feel free to get in touch.

Thanks,

Jordan Vander Klok

sent by e-mail August 29, 2022

from Nick Doe to Jordan Vander Klok (Parks Planner RDN)

hi Jordan

Thank you for the introduction.

As you must already be aware, I and Guy Moreau who lives at the western end of the park, and interested members of the Gabriola Streamkeepers have had disagreements with the CM RP planners in the past -- a long history. Hopefully sharing of information will progress rather more smoothly than in the past.

I'll get back to you soon, but for starters you might like to read page Z446 of Webp673z.pdf to get the flavour of where I at least am coming from. I have an omnibus file that combines all of the 673 field observation files making searching much easier but it is a very large file and not posted. Might be useful for all to have a copy.

Hope to see you soon and thank you again for the approach.

Nick

sent by e-mail April 6, 2023
from Nick Doe to LTC

Nick Doe
1787 El Verano Drive, Gabriola, V0R 1X6
Tel.: 250-247-7858
E-mail: nickdoe@island.net

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)

RDN: May 2, 2023, PARKS AND TRAILS SELECT COMMITTEE meeting.

Recording starts at 40:58

<https://rdn-pub.escribemeetings.com/Players/ISISStandAlonePlayer.aspx?Id=46a9d0fa-0d87-4023-9bad-8be577f88d5b>

Letter published in the Sounder, p.9, March 6, 2024.

Coats Marsh wetland survival

Dear Editor

The Regional District of Nanaimo's (RDN) project to demolish the weir at Coats Marsh rather than repair or replace it, thereby leaving it to the beaver-dam to keep the marsh from being completely drained as it once was, has now become a bureaucratic exercise on the part of the RDN, NTBC (Nature Trust BC), and provincial government (effectively an entity) to avoid paying the costs of preserving this wetland in the

state it was in for millennia before the start of human interference in the 1940s.

Complicit in this decision is the federal government through their ecological gift program, Environment Canada having agreed, astoundingly in my opinion, to the demolition without comment or public discussion. Complicit also to a lesser degree, but nevertheless complicit, are GaLTT (Gabriola Land and Trails Trust) and the Islands Trust for not supporting and not giving the marsh its much needed ecological-protection zoning, the existence of which would have at least facilitated more community-level involvement. This plan, as formulated, belies the words of the powers-that-be that preserving wetlands is for them a priority policy objective.

Coats Marsh is easily arguably the most important nature reserve on the island, being a winter refuge, breeding area, and secluded moulting area for several species of ducks, and provides habitat for many other wildlife species, both transient and resident, who depend on the increasingly rare natural areas that remain relatively undisturbed by human activities.

What has not been done by the RDN is to investigate alternative scenarios to their plan that would reduce costs and perceived liabilities to something reasonable (the consequences part of a complete risk assessment), and to investigate the actual probabilities of the risk event of the various scenarios in a less exaggerated and more informed manner than the analysis of their contractor, Northwest Hydraulic Consultants (the probabilities part of complete risk assessment). Included in the risk assessment should have been quantitative informed estimates of the risk that the entire marsh will be drained as a result of beaver-dam failure or long-term decay, and the possibilities for alleviating liabilities.

I'd rather have seen such investigations being done by a not-for-profit organization, and to intimately involve people who are acquainted with the marsh; live by the marsh; understand its irreplaceability; value it as a vibrant remnant of the ecology of the island as it once was; value it as a place of tranquility and refuge from the consequences of the growth in human population; think the needs of wildlife should sometimes be given substantial priority over human needs (nature reserves over recreational parks); and who know its long history.

Managing the marsh from a distance as has been done, practically entirely without local and up-to-date knowledge, including hiring consultants who are similarly without such knowledge, and who waste substantial amounts of time and money producing reports with content that reflect those failings, and without affording a modicum of control and influence to islanders, is in my view, shall I say, "clumsy".

Please indicate to the RDN your views on their plan to demolish the weir later this year and not replace it. It is for us who live on the island, a too-important decision to be made solely by distant higher-management officials ticking check-boxes.

Sincerely

Nick Doe
Member of Gabriola Streamkeepers (GSK)

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