

April 4th, 2023

Daniel Martin
Manager of Planning and Development
Bowen Island Municipality
981 Artisan Lane
Bowen Island, BC V0N 1G2

Dear Daniel:

Referral of RZ/OCP File # 2023-0018 - Rezoning/OCP Amendment Application - Metro Vancouver New Regional Park

Thank you for referring the Rezoning/OCP Amendment Application RZ/OCP File # 2023-0018 for comment to the Bowen Island Conservancy. We appreciate your consideration, in view of the proximity of the proposed Regional Park to the Wild Coast Nature Refuge (the "WCNR"), which is owned and managed by our organization. We note that, through this application, Metro Vancouver is seeking to establish up to 100 campsites for overnight use by visitors.

The comments and concerns listed below reflect the Bowen Island Conservancy's position as a BC Society, governed by a Constitution describing our mandate. We are primarily focused on conservation: protecting and preserving the natural environment of Bowen Island and surrounding waters. Our decision-making concerning protection and management of sensitive areas, such as the WCNR, is based on science, and makes use of relevant studies and other available data, so that we achieve optimal outcomes.

With this in mind, and given (a) the proximity of the Regional Park to the WCNR, (b) the proposed camping activities, and (c) the likelihood of substantial increased public visitation to the area, we have several concerns.

1. Impact on the Wild Coast Nature Refuge

The Conservancy acquired the three lots that comprise the WCNR late in 2020, and formally opened the area to the public in May of 2022. Our goal for the WCNR is aligned with our mandate: to preserve and protect the natural environment. Our primary objective is to leave the area alone: to minimize any sort of disturbance, and to allow nature to thrive free from human and other impact. The WCNR is home to several rare species of flora and fauna, and, in particular, the coastal bluffs are covered with a rich variety of lichens and mosses. Our secondary objective is to allow human visitation that has as low an impact on the area as possible: for example, we have used the driveway corridors (established by the original developers) as trails, carefully placed signage to deter visitors from walking around on the bluffs, and have put in place a "no dogs" policy to mitigate the effects of canine disturbance.

The proposed Regional Park will border the Nature Refuge on the north and east sides. Visitors to the Regional Park will, of course, have access to the WCNR, and we are concerned about the impact of increased visitor traffic in the Refuge. We are particularly worried about the possibility of visitors

bringing invasive species into the WCNR, being accompanied by their dogs, and walking on the bluffs, trampling the plants that grow there.

We are also concerned about preserving the existing conservation and wildlife corridors that connect to the WCNR from the rest of the Cape Roger Curtis lands, which will be part of the Regional Park.

2. Considerations concerning camping

With respect to the proposed camping facilities, this section outlines our concerns and comments. **If camping is approved we want to be certain that these are taken into account.**

Campsite type and location

Metro Vancouver's Rezoning/OCP Amendment Application incorporates a map showing proposed campsite locations, and the types of camping on those locations. As far as we are aware, no objective basis has been established for selecting either the locations or the type of camping to be permitted on them. Discussions to date between some of our Directors and Metro Vancouver representatives lead us to believe that the locations have been chosen simply because they were "disturbed" during construction activities several years ago, and the types and number of campsites at each location have been selected to meet some arbitrary goal that provides 100 campsites. No scientific evidence has been forthcoming that indicates whether the locations are appropriate for camping, or what type of camping, or how many campsites should be at each location. Nor has any investigation of disruption of local wildlife, or wildlife corridors, been carried out.

We support the statement on page 7 of the Staff Report concerning RZ/OCP File # 2023-0018: "*Council may wish to ... locate the zone variation P (c) only on the portions of the site identified for camping use*". **We go further to request that any locations selected for campsites are properly identified as not endangering fragile areas and ecosystems, with evidence-based selection criteria in place.**

Water

Seeps in the WCNR are highly dependent on the flow of groundwater; these seeps are seasonal and are so sensitive that we have prohibited public access to the area of the Refuge where they are located. We are concerned about how much water on the upland portion of the Cape lands will be made available to campers, and how this will affect the availability of water in the WCNR, and elsewhere in the Regional Park. **The seeps must not be disrupted by use of water elsewhere in the Regional Park area.**

Sanitation

Increased human activity, particularly camping, means that toilets, washing facilities, and garbage must be taken into consideration. We are currently not aware of any formal proposals from Metro Vancouver that will address issues of potential effluent leaks, treatment of grey water, and removal of garbage.

Fire

We are greatly concerned about the possibility of fire breaking out either in a camp site, or as a result of activity by visitors to the Regional Park. Although we have been informed that campfires will not be permitted by Metro Vancouver, this does not eliminate the risk of fire from camp stoves or small barbecues.

Traffic management

We are aware of alternative access routes into the Regional Park that are being considered by Metro Vancouver. One alternative is either a vehicle road, or a bike/e-bike trail via Thompson Road. **The**

Conservancy opposes any expansion of the current foot trail from Thompson Road into the Regional Park, since it will impact the Fairy Fen Nature Reserve.

Damage to the coastal bluff ecosystem

Any camping on the shoreline of the Cape lands will inevitably result in damage to the sensitive coastal bluff ecosystem from human foot traffic. Experience in other parks and areas with similar coastal bluffs shows that, over time, the plant species are damaged beyond repair and that eventually all that is bare rock. **We do not want to see any disturbance of the coastal bluffs anywhere at Cape Roger Curtis.**

Yours truly,

Bowen Island Conservancy

A handwritten signature in black ink, appearing to read "Owen Plowman". The signature is written in a cursive style with a vertical line to the left of the first few letters.

Owen Plowman, President