

Parks Canada
Western and Northern Service Centre
Suite 300 - 300 West Georgia St,
Vancouver, BC, V6B 6B4

18 March 2011

Attn: Clint Monson, Ministry of Transportation and Infrastructure

Re: File No. 2010-05875 Proposed Conventional Subdivision Application for: PID 015-935-876, DL 1375, New Westminster Group 1 Savary Island (Section 42) Road

Dear Clint Monson and others concerned,

This letter provides technical comment on the development application referenced above. These comments are being provided in my role as co-chair of the Coastal Sand Ecosystems Recovery Team.

This property (District Lot 1375) is an ecologically unique landscape that provides habitat for a number of rare or endangered species (Bawtinheimer and Roemer 2000; Page et al. 2011). The property is an example of a coastal sand ecosystem that is extremely rare on the coast of British Columbia (BC), and has been recommended as a candidate for an ecological reserve, vouching for its high ecological value (Bawtinheimer and Roemer 2000).

In total on the coast of BC, the area of occupancy of coastal sand ecosystems is only about 2500 ha, with less than 500 ha still occurring in the Georgia Basin (Page et al. 2011). With this extremely small amount of available habitat, and combined with serious threats from development, recreation and introduced species, there is a high level of threat to this type of ecosystem and the species within it. In a recent status report (Page et al. 2011), Savary Island (and this property in particular) is listed as one of 7 important coastal sand ecosystem sites remaining in the Georgia Basin.

More specifically, this property contains one of eight remaining populations of Contorted-pod Evening-primrose (CPEP) in Canada (Parks Canada Agency 2011). CPEP is listed as an Endangered Species under the federal *Species at Risk Act* (SARA). Under SARA, Endangered species must have a recovery strategy produced and critical habitat must be identified and protected. The recovery strategy for this species (Parks Canada Agency 2011) is currently in approvals and will be finalized within the next three months. This recovery strategy includes critical habitat for two locations on Savary Island, one of which occurs on this property (three sub-populations are present on the property at Beacon Point, Death Camas Meadow and Duck Bay; Figure 7, Parks Canada Agency 2011). Once critical habitat is identified, SARA compels the responsible jurisdiction to provide habitat protection. Protection mechanisms should be arranged between Environment Canada, the landowner and the BC Government.


Given the legal implications of the critical habitat, I am providing the draft recovery strategy for CPEP (Parks Canada Agency 2011), so that the locations of the proposed critical habitat can be

accounted for in the development plan for this property. Careful attention should be placed on Section 7.3 of the recovery strategy, as this section outlines what activities might be construed as causing destruction under SARA. Buffers may also be required around critical habitat areas to ensure that any remote effects of development are adequately mitigated. Finally, it should also be noted that the recovery strategy recommends that all populations be enhanced to ensure that the size of each population is adequate to ensure it remains viable. So the conservation interest in this property for CPEP goes beyond the present boundaries of the currently proposed critical habitat.

In addition to this species specific issue, due to the value of the property as one of the last remaining examples in the Georgia Basin of an intact coastal sand ecosystem, and one that houses a significant number of rare species and ecotypes (Bawtinheimer and Roemer 2000; Page et al. 2011), all such habitat on the property (and especially the old forest and herbaceous habitat shown on the attached Sensitive Ecosystems Inventory map) should be given special attention in planning of any development. Development should ideally be concentrated on the north side of the island to respect the high ecological value of the entire southern part of the property.

Please do not hesitate to contact me if I can be of further assistance in providing technical information to support a development plan that respects the high ecological value of this property.

Yours sincerely,

A handwritten signature in black ink that reads "Ross Vennesland". The signature is written in a cursive, flowing style.

Ross Vennesland, M.Sc.
Co-chair, Coastal Sand Ecosystems Recovery Team

Literature cited

- Bawtinheimer, B. And H. Roemer. 2000. Report on Natural and Recreational Values, District Lot 1375 Savary Island. Report prepared for the BC Ministry of Environment, Lands and Parks.
- Page, N., I. Walker, P. Lilley, and R. Vennesland. 2011. Status report of Coastal Sand Ecosystems in British Columbia. Report prepared for the Coastal Sand Ecosystems Recovery Team.
- Parks Canada Agency. 2011. Recovery Strategy for Contorted-pod Evening-primrose (*Camissonia contorta*) in Canada [Draft]. *Species at Risk Act* Recovery Strategy Series. Parks Canada Agency. Ottawa. vi + 30 pp.

Sensitive Ecosystems Inventory of Savary Island

February 2006

