

**To: The CRD Board of Directors**  
**By email**

**From: The Friends of Island View Beach**  
By email from [friendsofislandviewbeach@gmail.com](mailto:friendsofislandviewbeach@gmail.com)

September, 15 2015

**Re: Planning process at Island View Beach Regional Park**

In January we appeared before the Regional Parks Committee, and we wrote to each of you, cautioning that the CRD environmental assessment of Island View Beach was inaccurate and we urged you postpone the public meetings for a month so the assessment could be checked. We told you that if the environmental assessment was flawed then so too would be any public input you receive from it.

Regrettably you took no action to ensure that the information put before the public was accurate, and as we predicted the responses show this confusion.

The standard set for the environmental assessment was for it to be ***factual technical and scientific***. We question if it was any of these.

1. Despite requests from both ourselves and the District of Central Saanich, the CRD has not provided evidence to support the claims it made about the existence of species at risk in the park. And then when an FOI request was made for this data the CRD attempted to thwart it by proposing to charge a fee of \$1,165 for something that should have been part of the environmental assessment process! A complaint has been filed with the Information and Privacy Commissioner but why should that have been necessary?
2. Claims were made by the CRD about certain "species at risk" being "confirmed resident" in the park, without saying where in the park they were; when they were there; or even if they required protection. It was written as if the public could not venture anywhere without trampling on something precious and the thrust of the respondents with a conservation background was that "species at risk" must be protected from the public. **The reality however is quite different.** Of the 6 species that we have seen confirmation for, one is a spider in a bog where the public do not go; one is a plant in a small part of the fenced off area in the north so is already protected; and the other three plants were reported in 2007 as **"in excellent condition ... The plants are of high vigour and reproducing abundantly"**. The sixth is a moth that relies on one of the species of plant that is in "high vigour". None of these 6 species need additional protection. This was known by the CRD but not disclosed to the public.
3. The CRD suppressed the one expert report on the park they had commissioned for this environmental assessment. It only came to light because one of our members saw the expert working there last year and asked for his report. When the CRD finally acknowledged the existence of this report, they called it "an unpublished manuscript" and did not post it on their web site. The report was written by *Matt Fairbairn* of *Aruncus Consulting*, who is the undisputed expert on the plants at Island View Beach Regional Park. His report was the only scientific work prepared as part of this 2015 environmental assessment so why was it suppressed? And then

when brought to light, why was it not made available to the public? Perhaps because it questioned the existence of two species the CRD claim are in the park. This report by Mr. Fairbairn shows the standard that an environmental assessment of Island View Beach Regional Park should have been delivered at, but was not. You can see it on our website at: [http://www.friendsofisolandviewbeach.com/uploads/2/4/3/5/24351508/island\\_view\\_beach\\_camilsonia\\_and\\_lathyrus\\_survey\\_2014.pdf](http://www.friendsofisolandviewbeach.com/uploads/2/4/3/5/24351508/island_view_beach_camilsonia_and_lathyrus_survey_2014.pdf)

4. **Astonishingly, the CRD failed to address rising sea levels despite being cautioned by the Ministry of Environment Stacey Filatow 2009 report to do so, at page 17:**

*“Sea level rise due to global warming may threaten the ecosystems .... It is important to integrate climate change into management considerations ...”*

Island View Beach is just at sea level, so with rising sea levels and increased storm surges, in a short number of years the park may be under sea water unless something is done to protect it. **To talk about saving the "at risk" species in the park without a parallel plan to save the park itself, is a waste of CRD resources and taxpayer money.** See <http://www.friendsofisolandviewbeach.com/climate-change.html>

5. There are too many issues with the CRD environmental assessment to be reviewed here, so we will touch on just one.

In the section on Coastal Processes at <http://issuu.com/capitalregionaldistrict/docs/ivbnep-coastalprocess?e=2590922/10796152> the CRD included 4 pages about ground water salinity from Camosun College data that showed the Tsawout flatlands, in particular, had a high salinity. The CRD did not disclose however, that these same lands were around the Tsawout ditches that are full, year round, with sea water coming in the failed Tsawout flood gate, so it is to be expected the ground water there would have a high salinity and nothing else can be concluded from the Camosun data. The CRD was aware of the sea water in the Tsawout ditches because we had shown it to staff several times on site; we had emailed the Regional Parks Committee and senior park Staff on November 20, 2013 advising them of this; and we posted a video of the sea water passing through the floodgate on our web site in early 2014.

When we saw this section on the ground water salinity we wrote to the CRD in January reminding them the Tsawout ditches were full of sea water year round and that it should be disclosed to the public as the likely cause of the salinity. The CRD however did not change their presentation, implying instead the salinity was from ground water rising up, and **when we questioned them at one of the public meetings, the CRD stated to the public that the Tsawout floodgate had been fixed and there was no sea water in the Tsawout ditches.** This was not true and is evident to anyone with any knowledge of the area, as the CRD were holding themselves out to be. Two videos of the sea water coming through the Tsawout floodgate can be seen on our web site at: <http://www.friendsofisolandviewbeach.com/tsawout-flood-gate.html>

As is evident from these videos, anyone at these Tsawout ditches on a rising tide could not fail to see the incoming tide coming up the ditches, and not fail to know this was sea water. The public denial of this by the CRD is inexplicable.

6. Both the CRD written and oral presentations focused on – and exaggerated – the mosquito drainage ditches in the park, the mosquito control program, and the protective sea berm. They did not disclose that the Regional Parks Committee over the last two years has stated repeatedly that the mosquito drainage ditches and control program and the berm are to stay and be maintained. By their conduct, the CRD implicitly invited people to comment unfavourably on these and some did. This was a clear attempt by the CRD to circumvent policy laid out by the CRD Regional Parks Committee.

Some of the comments, by the way, were to open the sea berm to allow the park to flood with sea water. Those suggesting that appear not to have realized that would also kill all the species at risk in the park; it would flood the surrounding private lands and farms, the Central Saanich Park and the Tsawout lands; and it would put at risk the housing at Island View Beach Estates and Highcrest Terrace. See <http://www.friendsofislandviewbeach.com/howeasilyflooded.html>

This process is now in its 5<sup>th</sup> year and all you have is public input based on an irretrievably flawed environmental assessment. The most glaring deficiency was the failure to include a review of rising sea levels because the bulk of the park is at sea level and is only protected by a low berm. The CRD has already identified Island View Beach as the first to be inundated in rising sea level. See <http://www.friendsofislandviewbeach.com/climate-change.html>

If the berm is breached then the park is gone, so to proceed without a study of the impact of rising sea levels on the park would be a waste of time and tax payer money.

**We recommend you pause the planning process for Island View Beach Regional Park until a study has been made of the potential impact of rising sea level, and then decide how to proceed.**

Yours truly,

The Friends of island View Beach