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Environment Canada Conservation and Protection Environmement Canada Conservation et Protection



Pacific and Yukon Region Environmental Assessment Division 224 West Esplanade North Vancouver, B.C. V7M 3H7

Our File: 4202-1

November 7, 1994

Ms. Fran Johnson McDonald Wood Park Society P.O. Box 1334 Comox, B.C. V9N 728

Dear Ms. Johnson:

Re: McDonald Wood - Comox Harbour Wetland

Reference is made to my previous letter dated May 4, 1994 on the above subject. Reference is also made to your recent telephone conversation with Peggy Ward of this Department's Canadian Wildlife Service (CWS).

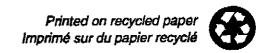
I understand that matters have now reached the point where the site in question is sold for development. Ms. Ward advised me that logging is slated to begin around two weeks from now. The Provincial Crown is apparently in the process of attempting to negotiate a land swap with the developer, although this apparently will not cover the entire site in question. You have expressed concern that the wetland portion of the site may still be subject to development, even if the land swap goes through. You have requested our assessment of the value of this wetland.

The Canadian Wildlife Service have had the site groundtruthed as part of their Sensitive Ecosystems Inventory (sponsored by all the resource agencies and many of the local governments. They have identified these wetlands as a sensitive ecosystem type, worthy of protection and would encourage the Town of Comox to do its best to protect the biodiversity of this expanding urban area.

According to the biologist who checked the site, there is a good diversity of salt marsh plants there. The quality of the site was rated 3 out a possible 4. In addition, two rare plant species have already been recorded from the Comox Harbour area (according to the Conservation Data Centre in Victoria) and they recommend that this particular site be surveyed in the right season to see if they occur here also.

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Although CWS have not reached the stage in their project where they can analyze their data to categorically state how uncommon a certain type of ecosystem is on the east coast of Vancouver Island, they do have the professional judgments of the biologists who have been in the field all summer doing the groundtruthing for us. Based on their experience and the experience of other wildlife biologists, salt marshes are relatively scarce, not only in the Comox Harbour, but also throughout the Vancouver Island coastal zone. Most of the original salt marsh fringing the Comox Harbour has been lost already.

On the basis of the above, I have no hesitation in stating that the interests of the local environment will be very well served by a preservation of this entire site including the wetland area. Any efforts made by interested parties to achieve this will have the full endorsement of Environment Canada.

Thank you for your concern for the environment.

Yours sincerely,

Adrian C. Duncan, P.Eng.

Coordinator, Referral and Liaison

Telephone (604) 666-0670

cc: Peggy Ward, Canadian Wildlife Service

BC Lands

Town of Comox, Planning Department