



October 12, 2022

Honourable Steven Guilbeault, Minister of Environment and Climate Change for Canada
Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard
Honourable George Heyman, Minister of Environment and Climate Strategy for B. C.

On behalf of the Nature Salt Spring naturalist group, we are writing to ask why your Ministries are not taking a role to protect and encourage restoration of the Fulford Estuary on Salt Spring Island. Our local Islands Trust government has, despite staff recommendations and many concerns raised by community members, given approval to Merchant House Capital's proposed resort development, known as the Vortex.

This project seriously threatens the biodiversity of a rare and very important ecosystem. Fulford Estuary is proven to support vulnerable at-risk populations of chum, coho salmon, cutthroat trout, migrating ducks and overwintering seabirds. If the development goes ahead, we will lose the opportunity to address past mistakes and protect and restore this ecosystem.

Fulford Creek flows into the estuary and is the most significant fish-bearing stream in the southern Gulf Islands. It's listed by the BC Ministry of Environment as one of the top ten Sensitive Streams of British Columbia. Recently, a unique population of freshwater mussels, with life-cycles tied to the salmon, has been found in Fulford Creek by Andre Martel, a zoologist with the Canadian Museum of Nature.

In addition, ample midden evidence attests to important cultural use of the area proposed for the Vortex development. The Local Trust Committee has ignored the necessity of a full archaeological assessment despite the cultural significance of salmon-bearing river estuaries to the Coast Salish people.

During the last 4 decades the local Island Stream and Salmon Enhancement Society has restored several areas along the creek and its tributaries. The Society is "extremely concerned that this proposal will have tremendous negative impact on the fish, birds, crustaceans, the eel grass beds, and the whole spectrum of marine life" and further states

“The Islands Trust planners have done an excellent job of reviewing the application and commenting on the proponent’s supporting documents. All their concerns were brushed aside by the elected trustees.... Fulford Harbour is an environmentally sensitive ecosystem. The Salt Spring Island Official Community Plan specifically mentions it as an area that must be protected.... This proposal should have been forwarded to the Ministry of Environment for a full review....”

We agree with this statement, and question why neither the provincial or federal Ministry is doing an environmental review of this proposed project. The Fulford estuary was negatively impacted many years ago when the Fulford Inn was built. However, with the Inn now gone, it would be possible to remove the fill, and allow the estuary to return to a more natural state. This would be a small task compared to the work that has been done and the amount of fill that has been removed from the Squamish River Estuary. A number of other B.C. estuaries (Cowichan, Fraser, Skeena, San Juan, Nimpkish, Nanaimo, Courtenay, etc.) are also being restored, some at very significant cost. Why is the most important fish-bearing stream in the southern Gulf Islands being ignored as a restoration site, and allowed to be further damaged?

As well as being vital to biodiversity and the health of many species, an intact estuary is an excellent carbon sink, and plays a significant role in combating the climate crisis. It is also a valuable nature-based solution to flooding, as it provides a wetland system that absorbs high water levels. Mapping sponsored by the Islands Trust and Capital Regional District shows that only a small area of the proposed development site will be above King tide levels in the future.

It makes no sense to allow this proposed resort to be built here. With increasingly extreme storm surges and rising sea levels caused by climate change, we need to rehabilitate estuaries like this one that have been previously filled and/or damaged in order to restore their original features and critically important natural functions.

We urge your Ministries to consider these issues, prevent development in the Fulford Estuary, and assist efforts to rehabilitate and restore this site to a thriving, productive natural ecosystem.

Sincerely,

Peter McAllister, Kathleen Maser, David Denning, Pat Miller and Jean Wilkinson
Steering Committee, Nature Salt Spring

Copies to: Elizabeth May, MP for Saanich - -Gulf Islands
Adam Olsen, MLA for Saanich North and The Islands
Gary Holman, Capital Regional District Director for Salt Spring Island
Peter Ballin, Conservation Chair, BC Nature