

February 28, 2007

Angela Letman
Development Planner
District of Sechelt
Sechelt, BC

**Tuwanek Ratepayers Association
7542 Sechelt Inlet Road
Sechelt, BC
V0N 3A4**

Dear Angela Letman,

Re: Eden Bay Estates Subdivision Rem. DL 3259 (Todd Road) in Tuwanek

The proposed Eden Bay Estates subdivision on the northern undeveloped portion of DL 3259 in Tuwanek is both a wonderful opportunity and a challenge for the developer. The sensitivity of the property to further disturbance and the existing community of Tuwanek downslope from the new subdivision places limits on its use.

Almost the entire project area consists of land located within Environmentally Sensitive and Environmental Hazard Development Permit Areas 2 - Watercourse Hazards, 4 - Rocky Beach Front and Upland Slopes, 6 - Rock Fall Hazards, and 7 - Wildlife Habitat Areas (formerly Golder DPAs 3, 5, 7 & 8). The property is a series of steep bedrock bluffs and small benches cut vertically by a high velocity watershed, Tuwanek's former water supply, which empties into Sechelt Inlet.

The property is contiguous with equally steep slopes extending directly above it and to the east, exhibiting equally hazardous conditions. Soil creep is observable. The extensive berm and rock catchment ditches proposed to mitigate identified rock fall hazards raises questions about the suitability of a residential development on this property. The rockfall catchment berm and ditches provide some protection to the new subdivision but fail to protect the developed lots immediately adjacent to this property.

Additionally, potential RR-1 uses of the subdivided properties includes agriculture and livestock husbandry. These properties are not on agricultural land and as configured will not be suitable for most agricultural uses nor are the individual properties large enough or capable of supporting livestock and the wastes that would be generated.

Residents of Tuwanek have used the northern half of DL 3259 as a park for over 3 decades and attempted to purchase it as a park for the municipality in 2000, we stewarded the Mt. Richardson Park proposal through 6 years of intensive public process to have 1001 ha dedicated as a Class "A" park in 1996 under the Protected Area Strategy and we have invested years of our collective time monitoring the Irvine Creek watershed and ensuring that it remained virtually intact from its source at Richardson Lake to Sechelt Inlet.

The Tuwanek Ratepayers Association has examined four aspects of this proposed subdivision: hydrology and its downslope affect; existing forest cover; services; and park dedication. These comments are intended to be in the best interests of all Tuwanek residents, including those yet to arrive. We sincerely hope they will be considered as such.

It is our opinion that with some changes; careful adherence to the intent of the Environmentally Sensitive and Hazard Development Permit Areas; and retention of the majority of the remaining forest stands on the property, a viable subdivision plan for this property is possible.

Forest Cover

The DPAs that have been assigned to this property are properly intended to constrain and guide development where a hazard, or in this case where an environmentally sensitive area and multiple hazards, exist. The recent logging that occurred largely in DPA 4 and to a certain extent in DPAs 2 & 7 will require that mitigation plans for these steep slopes be developed. All remaining forest cover should be retained to the extent possible in keeping with the intent of the relevant DPAs.

The remaining stands also serve to visually integrate the two halves of DL 3259 while dampening noise, which is invaluable in an area that amplifies sound and has a famous echo because of its location. These forested areas currently act as sponges for the slow release of water into the environment and provide valuable wildlife habitat. Construction in the forested zones of the property within DPA 4 should be done under the guidelines for the Coniferous DPA originally prescribed in the Golder Report.

Hydrology

Tuwanek receives higher than average precipitation. The substandard logging (and road building) on the south slope of the proposed development in 2003 has created problems that in some cases may not become apparent for another 15 to 20 years and will need to be addressed.

In general, south slope runoff will be problematic and unless ephemeral drainage patterns are restored poses a significant risk to Tuwanek. Channeling runoff from the Lambs Brook drainage into the Irvine Creek drainage is not an environmentally sound solution. Siltation from the existing ditch is already a serious problem. The proposed diversion has the potential for introducing sediments, septic discharge and/or other contaminants into a high quality water source that empties at Tuwanek's swimming and diving beach (the Spit). Flood conditions would pose an unacceptable risk and the pond would increase the potential for slope failure directly above the homes at the end of Sechelt Inlet Road.

The east pond is proposed on a 45⁰ slope and one of the steepest portions of the property. The drainage ditches delineated on the south facing slope would focus runoff that was formerly absorbed over the entire slope and discharge it at high velocity into Tuwanek's drainage system, already proven to be inadequate during the severe storms that have occurred since the 2003 logging.

A hydrological assessment based on restoring and protecting natural drainage patterns in the large clearcut areas should be undertaken to adequately manage this problem over the long term.

Utilities and Services

Underground hydro service should be required and, according to Tuwanek's OCP, street lighting should not be required of this developer. This is particularly important given the visibility of the area and its location next to a provincial park. With regard to street lighting, Sandy Hook's and Tuwanek's OCPs both cite Dark Sky objectives in keeping with a desire to retain the rural nature of our "neighbourhoods" within the new District. This new development will also be highly visible from most of Sandy Hook.

The proposed water infrastructure upgrade does not seem reasonable. Our suggestion is that consideration be given to locating the proposed pump station at the foot of the logging road traversing DL 1410 (which will also require water infrastructure) on Sechelt Inlet Road and that Chapman water is pumped from there to the existing 250,000 gallon reservoir on Gray Creek to service DL 3259. Gray Creek flows could be used to augment Chapman water in the summer and fall when drought conditions require. This would provide our area with a reservoir where we currently have only the water in the pipes in the event of an emergency in Tuwanek. Other benefits would be to eliminate the need for the proposed reservoirs on the Mt. Richardson Park boundary and eliminating the need for replacing the water main on Upland Road and the disruption that will cause for current residents.

Individual sewage treatment plants are planned. Have suitable fields been identified and individual waste management plans been approved for each proposed lot?

Park Area

The park areas suggested by the developer, while constrained from development, are not safe for use by the public. The knoll on the north eastern corner of the property is completely inaccessible and the strip proposed above lower Tuwanek is extremely steep and almost entirely located within a rock fall hazard (DPA 6) area. These areas will need to be retained in their current condition due to existing hazards but are not useful as public recreational resources.

The District of Sechelt has an opportunity to dedicate parkland in Tuwanek, where aside from two beach accesses; no park has been dedicated to date. The existing community of Tuwanek will be sharing the beach accesses with the new residents. Our association has a suggestion for a greenway/park that we hope you will consider and the developer will support. We believe that our concept addresses a number of subdivision design issues.

The community of Tuwanek has a special relationship with the Irvine Creek Watershed which for many years was Tuwanek's water source under licence to the Tuwanek Water Co. The water impoundment dam is located on proposed Lot 15 at the foot of the waterfall just below the small bridge at the boundary of Mt. Richardson Park. An awe-inspiring and well-known stand of old growth is situated just above the waterfall. For over three decades Tuwanek residents have been hiking up to this area, first to fix a recalcitrant water works system, and then for recreation. This beautiful landmark has unfortunately been assigned to one private property (Lot 15) under this subdivision plan. The rest of the watershed has also been assigned to private properties.

We suggest that the entire area defined as DPA 2 & 7 (Irvine Creek) within Eden Bay Estates become the designated park. Since development within the Irvine Creek DPA is contraindicated, relegating the waterfall, historical dam structure and the existing stand of old growth trees to one private property owner overlooks its history, its traditional usage and current value as a greenway.

The trail head proposed by the developer is completely cut off by private property, while access to the proposed greenway/park could be made at the cul-de-sac at the end of Sechelt Inlet Road, at Lot 3 in Tuwanek, which is unbuildable, and between Lots 28 and 29 on Carmel Place, as well as from the new subdivision. Our proposal would enable foot access for residents between the two areas and the beaches and park and is the most natural configuration for a greenway connecting Mt Richardson to the municipality. This also simplifies the “proposed trail” and its awkward route, which would bisect six private properties otherwise.

Alternately, but not as good a proposal because “connectivity” will not be addressed, all of Lot 15 (12,170m² or 3.7%) should become park.

Thank you for your consideration of these comments.

Yours truly,

Linda Williams
President
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Cc. Sandy Hook Community Association
East Porpoise Bay Ratepayers Association