



October 3, 2013

Liz Sutton
Land Use Planner (Island)
Agricultural Land Commission
133-4940 Canada Way, Burnaby, BC,
V5G 4K6
Via email: Elizabeth.Sutton@gov.bc.ca

Dear Ms. Sutton:

This letter is in regards to the Municipality of North Cowichan's proposed removal of a parcel of land in the Somenos Marsh Conservation Area from the Agricultural Land Reserve. To my understanding the Municipality of North Cowichan (MNC) is proposing to remove 1.78 hectares of Somenos Marsh Conservation Area (SMCA) agricultural land (i.e., Part of Lot 3, Plan 3979) from the Agricultural Land Reserve (ALR) and in return to offer a nearby 3.26 hectare North Cowichan property into the ALR to compensate for the removal of the 1.78 hectares.

The Somenos Marsh and surrounding agricultural and lowland areas were designated an Important Bird Area (IBA) in the year 2001 because these areas support large concentrations of waterbirds, notably Trumpeter Swan - <http://www.ibacanada.ca/site.jsp?siteID=BC051&lang=EN>. Somenos Marsh is one of nearly 600 Important Bird Areas across Canada that provide habitat for threatened birds or large concentrations of birds. Migratory birds depend on IBAs to rest, feed and breed. Without them, they could not make their long migration journeys each year.

Recent annual reports from the local Caretaker organization (Somenos Marsh Wildlife Society) have expressed concern about the loss of habitat for swans and other waterbirds, and recent bird counts suggest that the number of birds using the wetland and associated upland/agricultural areas have declined. Agricultural land adjacent to Somenos Lake provides numerous agricultural and human benefits and such agricultural uses are compatible with many wildlife uses. In particular, upland agricultural areas are particularly valuable for birds as feeding and nesting areas as well as areas that filter water and improve water quality.

While the Canadian Important Bird Areas program is non-regulatory, it is a cooperative initiative involving landowners. The goal of the program is to identify areas that are important for birds and to work with local communities, landowners, individuals and organizations to help conserve these areas for people and birds.

The program is coordinated by BC Nature in BC, with support from National Partners Bird Studies Canada and Nature Canada. A network of local volunteer Caretakers has been established across BC and Canada to help to raise local awareness about the importance of the site for birds and provide information to local, provincial and national program partners. For more information, please visit: www.ibacanada.ca.

We strongly urge the Agricultural Land Commission to consider the broader implications of the potential removal and development of Part of Lot 3, Plan 3979. Leaving the property as agricultural land within the Somenos Marsh Conservation Area would ensure that the area continues to provide agricultural benefits as well as numerous other important benefits, including wildlife habitat. In addition, opportunities to improve the property's agricultural potential, as well as its ability to provide other important human and wildlife values (e.g. stormwater management, water filtration, and fish and wildlife habitat) could be explored. The Delta Farmland and Wildlife Trust (www.deltafarmland.ca) is an example of an initiative that integrates wildlife and agricultural requirements.

Thank you for your consideration. Please do not hesitate to contact me with any questions.

Yours truly

A handwritten signature in black ink, appearing to read "J Neville".

John Neville, President
Federation of BC Naturalists (BC Nature)

cc.

Paul Fletcher, President, Somenos Marsh Wildlife Society paul@fletcherfoto.ca

Karen Barry, Acting BC Programs Manager, Bird Studies Canada bcprograms@birdscanada.org

Ted Cheskey, Manager of Bird Programs, Nature Canada TCheskey@naturecanada.ca

Mayor Jon Lefebure, Municipality of North Cowichan jon.lefebure@northcowichan.ca