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Attention: Mike Coulthard and Trevor Cox, Principals

cc: Camille Lefrancois, Jimmy Allen, Holly White

Re: Fundamental problems with Saanich's EDPA bylaw

INTRODUCTION

Thankyou for coming to Saanich and engaging with the public about the EDPA law, rather than just the insiders you listed on your posters. And for excluding Saanich staff and councillors.

I am an advocate for what feeds and shelters you – individual freedom supported by defense and justice systems. Human life requires rational thinking, that's lacking in the EDPA law.

Proper review of the law requires looking at fundamentals of its origin, makeup, and administration. Your posters and questionnaire omitted some options including eliminating the EDPA law. (You said that Saanich dictated the options to you. As professionals you should make it clear in your report that your assignment does not cover the complete question of validity and implementation of the law, and that the questionnaire did not cover all options.

Beware of chronic mis-representation of questionnaire/surveys in Saanich – use of self-selecting respondents cannot produce scientifically valid results. All it can provide is information – such as a Saanich resident's pointing to a major omission in the basis of plans for a key infrastructure replacement. Your open house signage and ad did include “feedback”, but also “survey”.

SAANICH'S EDPA LAW

Saanich's EDPA is based on the false claim that species are about to become extinct, when in fact they are common elsewhere – Saanich is at the limit of viability for many. The tactic used is to define species on political boundaries determined by humans, instead of essentials of the entities (such as form, motive means, reproductive means, and ability to read maps and census demands). (An example of a crazy claim made by some people in the greater Victoria area is that Trembling Aspen is threatened, it is rare here at the extreme limit of its range but plentiful inland, probably due to needing a substantive freeze-thaw cycle.)

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For example, the Garry Oak trees and BlueGray Taildropper Slugs used to justify the EDPA law are common in Oregon.

Some people's claims are irresponsibly ignorant. For example, one said that Arbutus trees only grow on southern Vancouver Island – you know they are common in the lower mainland of B.C., indeed they grow south into Baja California.

Be careful with claims on your posters – the CRD mis-represents where Great Blue Herons are common, eagles are more versatile than claimed, and the waterfall in your illustration of fish looks wide for streams in Saanich.

Many Garry Oak Meadows were created and maintained by fire, to increase production of food (such as Camas Lillies and probably deer who eat interface shrubbery). Hypocritically Saanich excludes that early farming activity while blocking human activity today. (See <https://www.uoguelph.ca/cedar/Pubs/pdfs/Pellatt%20and%20Gedalof%20Biodiversity%20and%20Conservation%202014.pdf> for examples.

Saanich's EDPA law attempts to force preservation of a static situation, whereas reality is that species change for various reasons. For example, Douglas Fir will supplant Garry Oak, as happened in Metchosin in the last 150 years. Suppressing new trees was one reason tribal people periodically burned their Garry Oak Meadows.

Invasive species limit attempts to restore what eco-activists consider “natural”, the EDPA law discourages planting of “native” plants for fear of being forced to keep them.

And that tribal people may have imported plants – that's suspected of oaks in California. (Oaks vary in the amount of tannin in their acorns, thus the amount of processing needed to be edible in quantity.) Tribal people here traded with tribes on the Columbia River despite language differences and a sea journey arduous even in summer. And pass-along trading occurred, probably the way that precious red dye from Mexico was brought here. Tribal people in northern Manitoba brought corn seeds from the south – that's a plant bred by tribes far to the south.)

Beware too the narrowly based “diversity” argument. There's ample vegetation and wildlife – yet activists claim there are no songbirds when in fact robins flock on lawns here to eat worms.

INDEPENDENCE

I recommend you find someone truly independent to advise you on Garry Oak ecosystems, that would have to be from the south as the subject is political in this area and you have few of the trees on the lower mainland. (Perhaps the Olympic Peninsula, as archaeological work verified use of fire to create meadows there.)

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You aren't independent, as you support "sustainability" which is based on presumption of static life (whereas nature evolves including with climate variations), and a negative view of humans.

Hopefully you looked at a few of the disputed properties while here to better understand the debate over application of the EDPA law to vegetation configurations and viability factors such as invasive species.

In my experience activist groups – including ones claiming expertise, do poor work, and make exaggerated and sometimes false statements about species and features of the ecosystems in question. By their reason for existence they are not independent. And so-called community associations in Saanich have a history of impeding human use of land, or worse.

You can't trust Saanich staff to be competent – for example documents about Cuthbert Holmes Park are sloppy, with a cheaped consultant's report that contains a fundamental contradiction.

And beware of the "climate change" scam used to control people. Climate has always varied, for example, the Medieval Warm Period – during which Vikings farmed southwest Greenland, was warmer than today – and stable. The "saturation" effect of overlap of the absorption-emission spectra of carbon dioxide and dihydrogen monoxide – the most common greenhouse gas, limits temperature increase from CO₂ to an amount of which most has already been achieved.

INCOMPETENT WRITING OF LAWS

The bylaw is badly written, with detail and procedures so obsessive that obvious errors cannot quickly be corrected (such as classification of pavement and buildings as sensitive ecosystems).

Hopefully there is a clear definition of "ecosystem" for bylaw purposes, however misguided – activists tend to warp language (when the word was invented in the 1930s it included humans).

Beware of mis-representation, such as the study claiming little impact of the EDPA law on property values – premature, there's evidence otherwise.

CALLOUS CHEAPING

The atlas/map of sensitive ecosystems was cheaply done, callously putting the burden of ground truthing on the backs of property owners. There seems to be an assumption that property owners can afford the work – especially the builders neo-Marxists detest, but reality is that many are elderly people of modest income who may suddenly need to sell their nest egg to pay for residential care.

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NIMBYs

Beware of NIMBYs, whose agenda is to control others' property at no cost to themselves – that's theft. Some tried to use the EDPA to block use of a modest property for housing despite its shallow soil and adjacent housing that limited farm use.

We live by our minds, to prosper we must be able to take the action our minds guide us to – the EDPA law denies that. Property rights are very important to communities, not just individuals, as they foster care of the environment, whereas collectives have a poor record.

CI USE

Hopefully I'm opening your horizons with information and with identification of the underlying problems with Saanich's EDPA law. I can provide more specifics.

I hope you got to see an actual Garry Oak Meadow while here, not just a few trees. (Perhaps you noticed what seem to be two different varieties of oak at the edge of the parking lot of the Salvation Army facility. There are others here, I know of one that looks like a Blue Oak – and beware that oaks hybridize without human help.)

In my opinion you've got yourself in a professionally awkward situation - lacking adequate knowledge, not independent, short of funds to get better knowledge, and hired for an incomplete job by people with a conflict of interest. (On top of the politics – note the recent action against a biologist, interestingly timed, and the hatred in body language seen in council meetings and public hearings.)



PS: Beware there's been sniping about terms like "EDPA law", but that's fallacious. The EDPA "guidelines and objectives" are part of an Appendix to the Official Community Plan bylaw, thus "law" is appropriate, and are being treated as requirements by council and staff despite their title. There's a labyrinth of documents, you should make sure you have them all.

PPS: I am a resident in Saanich and voter in Saanich, but use a mail box for security due to the hostility of eco-activists.

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