

From: [City of Nanaimo](#)
To: [Public Hearing](#)
Subject: New form entry is submitted - Public Hearing Submission
Date: May 20, 2026 10:03:26 PM

[Public Hearing Submission](#)

Submitted on 20 May 2026, 10:03 PM

Your Name	██████████
Your Address	████████████████████
Bylaw Number or Subject Property Address Which You Are Addressing Your Comments	Bylaw 2025 4500.243
Comments	<p>I would like to provide a positive comment to the addition of a small wetland at 3400 Barrington Road to the updated Schedule C Watercourses and Marine Foreshore Map. The proposed development at this site will have serious implications to the "newly identified wetland" on the property, and the larger wetland located north of 3600 Barrington Road, if there are not provisions to ensure that rainwater management is designed to mimic the natural watershed conditions that exist at this site. There should not be any surface (or piped) drainage flows into these wetland complexes from the property unless they mimic the amount of water that was infiltrated to groundwater under natural watershed conditions, provide the interflow connectivity to the wetlands and to maintain or decrease potential flood risks downstream in the Cottle Creek watershed. This wetland complex at 3600 Rock City Rd. and 3481 Rock City Rd are very important headwater sponges that fill slowly in the winter months, and release water downstream into Cottle Lake and lower Cottle Creek in the summer "low flow" months. The City must ensure that developments at 3400 Barrington Rd does not harm the hydrology of Cottle Creek.</p>

From: [REDACTED]
To: [Public Hearing](#)
Subject: Unique sensitive ecosystem protection at 3500 Rock City Road, Nanaimo
Date: May 21, 2026 9:44:50 AM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I'm writing to strongly support additional City of Nanaimo protection and stewardship of a **unique lodgepole pine swamp ecosystem at 3500 Rock City Road** (attached map). I'm a retired professional fisheries biologist who has lived in Nanaimo since 1987. I believe this pine dominated swamp may be a singular example of its kind within the City's urban containment boundary. It also lies within the 4.86 square kilometer Cottle Creek watershed, the centre piece of north Nanaimo's Linley Valley. The pine swamp ecosystem supports a broad diversity of terrestrial and aquatic plant and fauna species that are highly dependent on the prevailing (seasonal) groundwater hydrology at this site. Construction of the DP-approved apartment complex at 3400 Barrington Road poses a direct threat to surface/groundwater connectivity to the swamp, and ultimately to the downstream Cottle Lake and creek drainage system.

Together with several colleagues, we have been very active as volunteer stream keepers in the Cottle Creek watershed since 2024. **Nanaimo's Official Community Plan, entitled, "City Plan – Nanaimo Reimagined" (2022) acknowledges the value of healthy watersheds by stating, "The health of the city's streams, lakes, wetlands, and waterfronts depends on the land and plants around them, and on the watersheds that feed them."** The Plan lists three key desired outcomes in support of this overarching concern:

- **A significant number, and wide array of, biologically diverse freshwater and saltwater ecosystems throughout the city that are preserved for future generations;**
- **Restoration of areas that have been impacted by erosion related to past development, and**
- **Thoughtful integration of urban development and built and natural systems that protect and enhance the quality of the city's watersheds, even as the city densifies.**

A recent biophysical inventory of fish habitat in Cottle Creek (Clark and Wightman 2026) determined that summer base flows are most limiting to productivity and survival of the stream's coastal cutthroat trout population. This study further emphasized that summer base flow augmentation is the single-most important strategy for trout conservation in this urban watershed. Consequently, we believe enhanced assessment and mitigation of the effects of large-scale development of 3400 Barrington Road are entirely warranted following guidance from the 2022 OCP and supporting City policy C1.4.1 **"Support summer base flows in watercourses** and limit in-stream or bank erosion related to high stormwater flows and volumes, by addressing the extent and scale of rainwater management infrastructure."

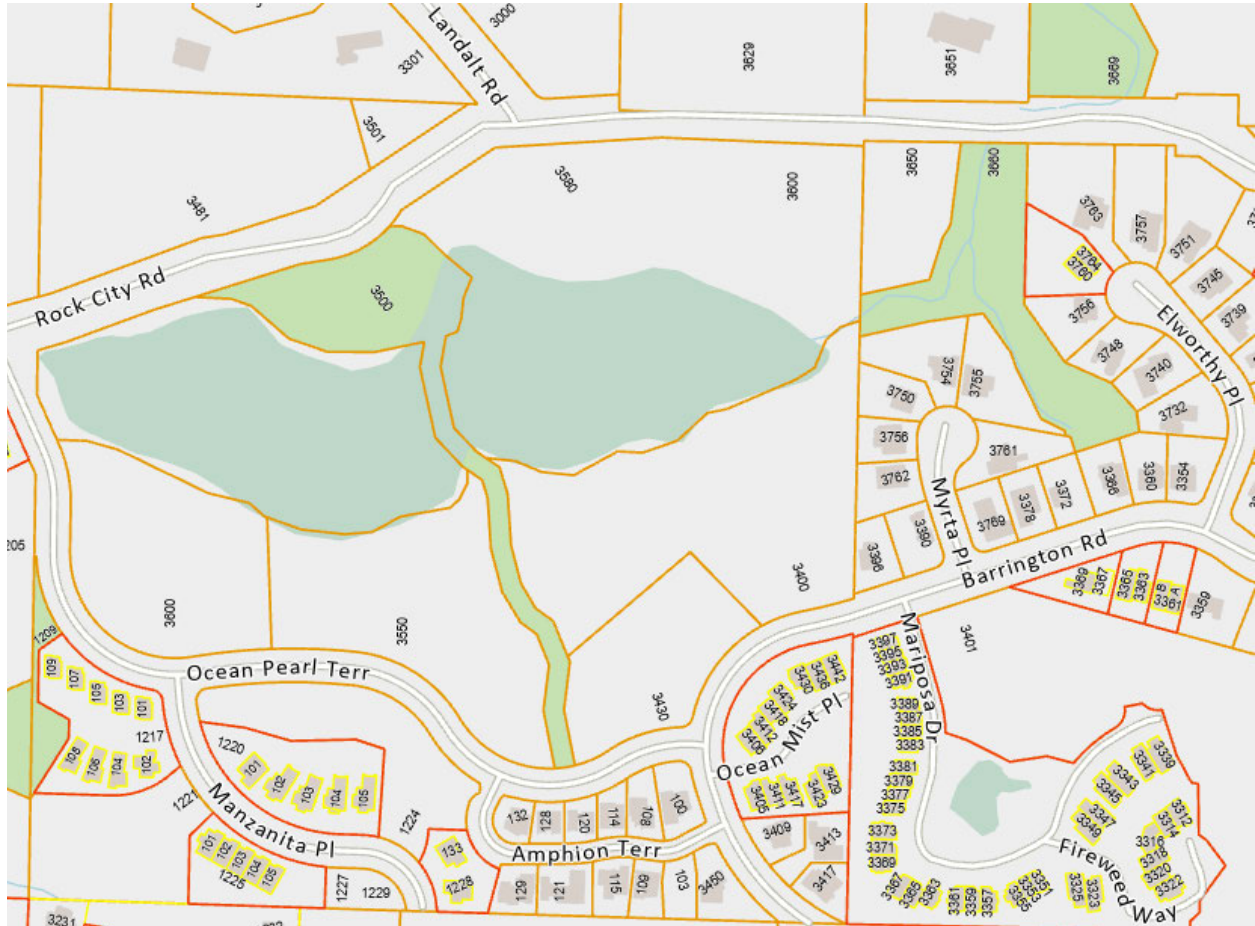
To-date, detailed seasonal runoff and groundwater impacts of blasting and extensive site preparation at this building site are unclear. The environmental (RAR) assessment of the site did not address the unique hydrology that supports the pine swamp ecosystem, or linkage to the upper Cottle Creek basin. These project design shortfalls must be systematically addressed before any building permit is issued. Moreover, there should be a more transparent process that invites public scrutiny and accountability of the developer's plans and proposed mitigation measures for protecting the swamp and shallow groundwater connectivity in the upper Cottle Creek watershed.

Yours truly,

[REDACTED], Nanaimo

Notice of Public Hearing - May 21, 2026 - Bylaw No. 4500.243

By redesignating the lands legally described as PARK DEDICATED BY PLAN EPP120017 (3500 Rock City Road) from Suburban Neighbourhood to Parks & Open Spaces as shown on Schedule J - Map 9.



Lodgepole Pine in Wet Bog Environments

Lodgepole pine can thrive in wet bog environments, such as the treed bog wetland found along the southern B.C. coast. These wetlands are characterized by their water-saturated conditions, often with peat accumulation that raises the surface peat above the watertable. The soil nutrient regime in these wetlands is poor to very poor, which is why lodgepole pine can be found in such environments. The tree's ability to adapt to these conditions is a result of its fire-adapted nature, allowing it to regenerate well after wildfires. The lodgepole pine's twisted needles and bent form are also adaptations to its environment, helping it to survive in hostile conditions.



From: [REDACTED]
To: [Public Hearing](#)
Subject: Protect unique sensitive ecosystem at 3500 Rock City Road, Nanaimo
Date: May 21, 2026 1:34:09 PM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

May 21, 2026
City of Nanaimo, Planning & Development
455 Wallace Street, Nanaimo BC, V9R 5J6
Via email: public.hearing@nanaimo.ca

Re: CITY OF NANAIMO BYLAW NO. 4500.243 A BYLAW TO AMEND THE “CITY OF NANAIMO ZONING BYLAW 2011 NO. 4500” AND PROTECTION OF SENSITIVE WETLAND ECOSYSTEM AT 3500 ROCK CITY ROAD

Background and general comments

This written submission is to identify significant concerns with respect to an approved development at 3400 Barrington Road which borders the wetland at 3500 Rock City Road.

My awareness of this site was initiated by a recent petition on [Change.org](#) “Protect Linley Valley Wetland and Rock City Neighbourhood”. I since reviewed the City of Nanaimo Delegated Approval Report regarding the Development Permit Application DP1372 Barrington Road and had the privilege of visiting the Barrington Road wetlands on May 20, 2026, accompanied by local residents, retired professional biologists and volunteers with Friends of Cottle Creek, a streamkeepers group associated with Nanaimo and Area Land Trust.

Based on this preliminary visit to the site, I was awestruck by its rare and unique characteristics, including relatively intact native plant species assembly (shore pine and lodgepole pine swamp, and upgradient bedrock bluffs including Gary Oak/arbutus uplands), and ecological value of the site to local area wildlife, including potentially rare and endangered amphibians. I feel strongly that this area deserves special attention and protection from adverse impacts. It appears that the development permit for the 3400 Barrington Road site was approved by staff via delegated authority, without a thorough understanding of these unique values and the potential risk of adverse impacts to this sensitive ecosystem from changes in site drainage and hydrology. Both the scale and methodology of the proposed development, including blasting to level bedrock outcrops within the wetland’s watershed capture zone and in close proximity to sensitive ecosystems, and construction of a massive 6-storey, 102 unit apartment building, seems both economically unfeasible and logistically unsuited to the site, and have the potential to significantly alter the local drainage patterns and sensitive water balance of the downstream wetlands.

The subject wetland is within the Cottle Creek/Linley Valley watershed, which has been a long-term focus of local conservation and assessment efforts. Urban streams in Nanaimo face innumerable challenges including development encroachment, alteration of local drainage systems, and climate change which is altering the timing and duration of precipitation, leading to extended dry seasons and diminished flows in local watercourses. Wetlands provide an important buffer for overland flooding, while receiving and storing water from surface runoff

and shallow subsurface flow which is then released slowly to maintain downstream habitats. The direct economic value of streams and wetlands in terms of ecosystem services is highlighted within the Ecological Accounting Process (EAP) methodology being used by of Vancouver Island University, [Mount Arrowsmith Biosphere Region Research Institute \(MABRRI\)](#), and which I understand will be undertaken in the Linley Valley watershed later in 2026.

The City of Nanaimo must strengthen its planning approaches and mechanisms to protect wetlands and water courses within the urban environment, starting with a second look at the development approval and requirements for this parcel.

Bylaw comments and recommendations

<!--[endif]-->Re: Amendment 2 (8) rezoning of lands at 3500 Rock City Road to Parks, Recreation and Culture

<!--[endif]-->I am in favor of the proposed rezoning and park dedication.

Additional recommendations:

<!--[endif]-->That council review and consider a larger area inclusive of the entire wetland area to be permanently set aside from development in the subject lands, due to the unique and special ecological and hydrological characteristics of this area.

<!--[endif]-->Amendment 2(23) Schedule C mapping of watercourses and setback requirements (with respect to identification of a vernal pool at 3400 Barrington)

I am concerned that water features including amphibian habitats on the subject lands at 3400 Barrington Road may not have been adequately documented within the development permit area assessment, and therefore the issuance of the development permit was not done with a fulsome understanding of the unique characteristics of ecologically sensitive features on the site.

The site characteristics including steep slopes, bedrock outcrops and gullies bordering the watershed capture area upgradient of the wetland present a unique challenge for management of site runoff and shallow groundwater flow. Due to these site characteristics, there is a risk that the proposed construction activities could lead to direct impacts including encroachment into a stream, and harmful alteration of riparian environments, in potential violation of the *Water Sustainability Act* and Riparian Areas Regulation.

<!--[endif]-->City of Nanaimo riparian setbacks (7.5 m to 15 m) are less than 30 m setbacks included within provincial riparian areas regulations, and in unique sites such as on the subject lands may be insufficient to prevent adverse short-term and long-term impacts.

<!--[endif]-->That modification of the site drainage characteristics presents a risk of permanently altering the quality and quantity of water which contributes to the maintenance of the downstream sensitive wetlands and hydraulically connected watercourses.

Recommendations:

That Nanaimo Council and staff require that a hydrologic site assessment be completed for the subject parcel (3400 Barrington Rd), including detailed mapping and documentation of all wetland and riparian features, and evaluation of how the proposed building footprint, vertical height and proposed construction method--blasting and removal of upgradient bedrock bluffs-- will alter site hydrology and water balance of

the sensitive downstream ecosystems.

<!--[endif]-->That city staff be directed to review the horizontal setback requirements from riparian areas of building and site alteration on the subject parcel, and that a larger setback potentially be required considering the site configuration, steep slopes and bedrock gullies that direct flow from upstream areas, because these site characteristics present a unique challenge for management of site runoff and shallow groundwater flow discharging to riparian environments.

<!--[endif]-->That municipal permits for construction on the subject parcel not be issued, and that alteration of the site be delayed until such time as additional assessments have been undertaken.

Thank you for your consideration.

██████████ M.Sc., P.Geo.

Senior Hydrogeologist, ██████████

Nanaimo Resident

Email: ██████████

Personal background and qualifications:

I am a professional hydrogeologist with over 25 years experience primarily working primarily in British Columbia's west coast region. I was a former staff within provincial government water protection programs for nearly twenty years, including as regional hydrogeologist for seven years, I have been working in private consulting since 2023 based in the Nanaimo region. I have extensive experience in groundwater quantity and quality studies including evaluation of hydraulic connectivity between groundwater and surface water sources, completion of Development Permit Area reviews and assessment of impacts of development on groundwater resources (Parksville, Regional District of Nanaimo, Cowichan Valley Regional District and Comox Valley Regional District), studies of hydrogeology of fractured bedrock aquifers (District of Highlands, Lantzville Foothills), and water balance, aquifer and groundwater protection (Gabriola Island, southern Gulf Islands). Locally, I am a volunteer member of the Technical Advisory Committee of the Regional District of Nanaimo, Drinking Water and Watershed Protection Program, and BC Regional Director for International Association of Hydrogeologists, Canada.