



18 October 2015

**TO:** The Commissioner for Public Hearing of October 20th, 2015; and  
The Department of Municipal and Intergovernmental Affairs.

**RE:** 'Witless Bay Municipal Plan and Development Regulations' –  
Submission and Statement of Objection

**FR:** Bill Montevecchi

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As an interested party, I support fully the protection and maintenance of the longstanding traditional uses and current 'Rural' zoning designation of the lands and shoreline in the Ragged Beach area of Witless Bay.

The Ragged Beach area is comprised almost entirely of publicly-owned Crown Lands.

The Witless Bay Seabird Ecological Reserve is a globally significant marine bird protected area.

The Witless Bay Ecological Reserve is the most heavily impacted Seabird Reserve in Newfoundland and Labrador.

Owing to the proximity of towns, marine businesses and activities and the high tourist visitation rates, the seabird colonies in the Witless Bay Ecological Reserve are the most highly at risk to disturbance, development and encroachment compared to any Seabird Reserve in our province.

The cumulative effects of ecotourism and development on the Witless Bay Ecological Seabird Reserve are profound. The offshore supply base nestled among the tour boat operators in Bay Bulls has a considerable environmental footprint with large vessel traffic throughout the period of seabird occupancy from April through October.

Lights attract and disorient marine birds, especially birds like Leach's storm-petrels and Atlantic puffins those that are nocturnally active and whose offspring depart the nesting burrows at night. More coastal development such as the one proposed for Ragged Beach will greatly increase night-lighting immediately adjacent to the Reserve and will compound the currently high risk situation in Witless Bay.

Government's decision to eliminate the Manager's position in the Witless Bay Seabird Ecological Reserve reflects a "taking for granted" elitist attitude and perspective to environmental valuation and protection. Further coastal development in the immediate vicinity of seabird colonies is imprudent and consistent with an attitude of ambivalence or worse with respect to the coastal and marine environmental and wildlife protection.

Owing to grave concerns about the further degradation and devaluation of the coastal and marine habitat and its effects on the nesting seabirds in the Witless Bay Ecological Seabird Reserve, I strongly oppose the changes in the proposed Municipal Plan and Development Regulations which would eliminate the current 'Rural' zoning (and 'Park' designation) of lands and shoreline in the Ragged Beach area – and which proposes to change the land use designation for this area from 'Rural' to 'Residential' zoning.

For your information, I attach a recent article about the Witless Bay Seabird Ecological Reserves by my colleagues and me that was published in the *Osprey*.

Thank you for your attention and consideration in this hearing.

Signed and sealed on this 18<sup>th</sup> day of October 2015:

W. A. Montecvecchio

W. A. Montecvecchio, Ph.D.  
University Research Professor  
Psychology, Biology and Ocean Sciences Centre

Attachment