Saanich Action for the Environment (SAFE) Position on the EDPA

Saanich—An Ecological and Sustainable Vision

Bordered by city, ocean, agricultural land, and connected natural areas, the District of Saanich is subject to pressures from urban growth and development that threaten biodiversity. Saanich is in transition towards a sustainable future with a strong record of environmental stewardship and a commitment to sustaining and regenerating the area's natural heritage.

SAFE's rationale for keeping the EDPA bylaw

- The EDPA bylaw is an important piece of environmental* legislation. The objective of the bylaw is to: protect the areas of highest biodiversity, require mitigation during development, and require restoration during development.
- The EDPA atlas includes ecosystems that extend across neighboring properties, both public and private, including streamside (non fish-bearing), isolated wetlands, marine backshore, Garry Oak and other sensitive ecosystems.
- Prior to the enactment of the bylaw, no tool existed to address continued ecosystem fragmentation associated with building, subdivision and infrastructure construction.
- The bylaw provides Council and staff with a tool to manage for ecosystem protection, rehabilitation, and restoration by providing control of development in Environmentally Significant Areas (ESAs).
- We recommend that Saanich continue to use the bylaw to achieve the stated objectives through control of development and redevelopment in ESAs. Improvements as outlined below should be considered.

Proposed improvements:

1. More clearly define permitted and non-permitted activities

Clarity is required for the definitions of development and redevelopment, which may include: subdivision, rezoning, building and connecting infrastructure construction, the removal of native vegetation, and the removal or depositing of soils. Activities on EDPA property that fall outside of the definition of "development" do not need a permit and are accepted as long as they comply with all other Saanich bylaws and regulations. Clearer communication with the public by Council and staff is required.

2. Develop policy and standards for ESAs

Uncertainty exists around how to define an ESA within an urban context. This includes when restoration will be required and where provisions for ESA continuity apply to connect fragmented ecosystems. Developing clear principles, guidelines and best practices (examples) that the public may consult while preparing applications will improve certainty for applicants and reduce distrust in the process.

3. Improving the EDPA Atlas

The EDPA Atlas has been a significant topic of dispute with regard to the current implementation of the bylaw. Careful consideration should be given to the merits of attempting to precisely define the boundaries of ESAs. Understanding that nature is a continuum, more precise definitions than are currently implemented may not be a realistic goal, and furthermore may still attract disputes. Alternative

approaches such as broader coverage of the EDPA in Saanich could reduce such disputes and remove the perception of individual properties being singled out, while still achieving the objectives of the bylaw. Whichever approach is taken, the standards used must be effectively communicated with regards to how they support the bylaw objectives.

4. Develop education and communication initiatives to promote stewardship To achieve better outcomes for the environment, it is recommended that Saanich undertake programs to educate, reward and encourage better environmental stewardship for all properties in Saanich. Many such areas are environmentally significant and important to biodiversity.

Existing volunteer programs such as "Pulling Together" and NGO educational programs should be encouraged and expanded. Saanich could partner with local restoration experts and institutions such as UVic to support and advise property owners. This would have the advantage of building community and relationships to support environmental stewardship.

5. Strengthen protection, mitigation and restoration on public land Public respect for the EDPA bylaw depends on Saanich being held to the same

standards on publicly managed lands. There are opportunities for more areas in our parks to be designated as ESAs to further expand the potential for protecting biodiversity. Parks may need more resources to maintain and restore ESAs.

6. Appeals and dispute resolution

A strong, transparent appeal process is required. An independent, professionally qualified, impartial and objective review body could serve as an appeal review board to advise Council. Any issues with the administration of EDPA should be reviewed as per normal management practice. Training and oversight may alleviate concerns.

Recommended further research and evaluation

1. Buffers: While many believe that buffers are critical to ESAs, this feature of the ESA Atlas has been a concern. Saanich may undertake a review of literature and provide a more transparent rationale for how buffers contribute to healthy ESAs. While ground-truthing of each ESA and buffer area may not be viable, review of the mapping with specific regard to ESA or buffer areas extending over buildings or infrastructure may be warranted.

2. Ecological Advisory Committee: Saanich should consider forming an advisory committee focused on ecological matters with expertise on ESAs, restoration, environmental public policy, and green infrastructure to advise and support staff and Council in moving forward.

3. Tracking and Reporting: Saanich and the CRD should consider how best to track and report longer term ecological and environmental trends to better inform the community how increasing population density, associated development and other threats may be accommodated while sustaining our environment. A State of the Environment reporting process is essential in monitoring progress towards goals set out in the OCP.

*Environment includes 'Green infrastructure' such as drainage, rainwater management, air and water quality.