



AGENDA

For the Council Meeting to be Held
At the Saanich Municipal Hall,
770 Vernon Avenue
MONDAY, MARCH 6, 2017

I 6:00 P.M., COMMITTEE ROOM NO. 2

Motion to close the meeting to the public in accordance with Section 90 (1) (a) of the *Community Charter*.

II 7:00 P.M., COUNCIL CHAMBERS

A. DELEGATIONS

P. 2

1. **GLENLYON NORFOLK SCHOOL ENVIRONMENTAL CLUB/SURFRIDER VANCOUVER ISLAND – PLASTIC BAG REDUCTION**

P. 4

2. **MINISTRY OF FORESTS, LANDS & NATURAL RESOURCE OPERATIONS – AERIAL SPRAY FOR GYPSY MOTH ERADICATION**

B. ADOPTION OF MINUTES

1. Special Council meeting held February 21, 2017
2. Council meeting held February 27, 2017
3. Committee of the Whole meeting held February 27, 2017

* * * Adjournment * * *

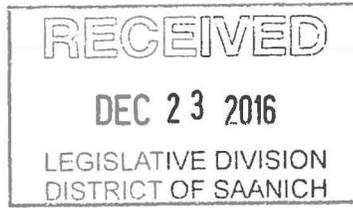
AGENDA

For the Committee of the Whole Meeting
**** IMMEDIATELY FOLLOWING****
The Council Meeting in the Council Chambers

- P. 5
1. **2785, 2801, 2811, 2821, 2825, 2831 TUDOR AVENUE AND 2766, 2810 SEA VIEW ROAD**
Report of the Director of Planning dated February 15, 2017 recommending that Council endorse Option 1 to not support the request to remove the properties from the Environmental Development Permit Area for the reasons outlined in the report.

* * * Adjournment * * *

“IN CAMERA” COUNCIL MEETING IMMEDIATELY FOLLOWS



District of Saanich
Legislative Division
770 Vernon Ave.
Victoria BC V8X 2W7

t. 250-475-1775
f. 250-475-5440
saanich.ca

Application to Appear as a Delegation

Personal information you may provide on this form is collected under s. 26(c) of the FIPPA and will be used for the purpose of processing your application to appear as a delegation before Saanich Council. The application will form part of the meeting's agenda and will be published on the website. Your personal telephone number and e-mail address will not be released except in accordance with the *Freedom of Information and Protection of Privacy Act*. Questions about the collection of your personal information may be referred to the Saanich FOI Team, 770 Vernon Ave, Victoria, BC, V8X 2W7 or by telephone at 250-475-1775.

General Information

Name of Organization or Association

Meeting Date Requested (Except the last meeting of the month) Application must be submitted by 12:00 noon at least 10 days prior to the meeting date.
Day Month Year

Contact Information

Name of Contact Person (for Organization or Association)

Telephone Number

E-mail

Presentation Information

Please be specific and attach additional information if required. Maximum presentation time is 10 minutes.

Topic of Discussion
Please describe the topic of your presentation

I have attached background materials Yes No Printed background information should be submitted for distribution with the agenda, or bring 13 copies to the meeting.

Audio/Visual Presentation Yes No Presentation materials need to be submitted by noon on the Friday before the meeting and tested on Saanich equipment.

For Office Use

Delegation for Meeting: February 6, 2017

Refer to Committee: _____

Refer to Department: _____ Direct Action: _____ Response: _____

Plastic bag reduction the way forward: Stage 1

-Public education/outreach to stakeholders. Pamphlets in mailboxes/
businesses outlining the issue and proposed solutions (short term and
long term).

Students could help in the writing of these.

-Meetings with business association/ neighbourhood groups- possible
pilot programs with willing businesses agreeing to not give out plastic
bags for a period of time- monitor and report back on reactions.

-Media coverage- CFax already have agreed to follow the students in this
campaign. CTV would also likely do the same. Shaw Channel 4?? Great if
the students could be on TV with the mayor to speak about what they
are doing.

-Students around Saanich design a Saanich re-useable bag – contest run
on the media. Source locally (are makers of organic cotton bags in
Vancouver).

Bags could be distributed to stores to give out?

-Levy on plastic checkout bags. Money collected pays for the Saanich
bags and the public education campaign.

-Need some kind of monitoring of the possible reduction in use- 6
months?? Need to find out from the UK government how they did this as
they claim a large % in reduction- not sure about this, however.

Stage 2

-Move to an increased fee, along with continued public
education/outreach.

- Sufficient notification of when plastic bags will no longer be given out.
Thrifty foods gave several months notice, same with Mother Nature's on
Cook St. Thrifty foods gave out re-useable bags for several months - then
charged for them.

-
- Finally eliminate checkout bags altogether

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Mayor
Councillors
Administrator

LEGISLATIVE SERVICES

Council
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Media

Application to Appear as a Delegation

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General Information

Name of Organization or Association Ministry of Forests, Lands & Natural Resource Operations

Meeting Date Requested (Except the last meeting of the month) 06/20/17 Application must be submitted by 12:00 noon at least 10 days prior to the meeting date.

Contact Information

Name of Contact Person (for Organization or Association) Tim Ebata

Telephone Number 250-387-8739

E-mail Tim.Ebata@gov.bc.ca

Presentation Information

Please be specific and attach additional information if required. Maximum presentation time is 10 minutes.

Topic of Discussion
Please describe the topic of your presentation
Elk Lake / Bear Hill Aerial Spray for gypsy moth eradication
A short presentation describing the planned operation

I have attached background materials Yes No Printed background information should be submitted for distribution with the agenda, or bring 13 copies to the meeting.

Audio/Visual Presentation Yes No Presentation materials need to be submitted by noon on the Friday before the meeting and tested on Saanich equipment.

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Delegation for Meeting: March 6, 2017

Refer to Committee: _____

Refer to Department: _____ Direct Action: _____ Response: _____

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The Corporation of the District of Saanich

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Report

To: Mayor and Council
From: Sharon Hvozdanski, Director of Planning
Date: February 15, 2017
Subject: Request for Removal from the Environmental Development Permit Area (EDPA)
File: 2860-25 • 2785, 2801, 2811, 2821, 2825, 2831 Tudor Avenue, and 2766, 2810 Sea View Road

PROJECT DETAILS

Project Proposal: The applicant is requesting that the subject properties be removed from one Environmentally Significant Area of the Environmental Development Permit Area (EDPA). These properties were originally included in the EDPA to provide enhanced protection to the Terrestrial Herbaceous Sensitive Ecosystem type.

The request is based on the submission of a biologist report which states there is no sensitive ecosystem present.

If Council supports this request, the EDPA Atlas would need to be amended.

Addresses: 2785, 2801, 2811, 2821, 2825, 2831 Tudor Avenue and 2766, 2810 Sea View Road.

Legal Description: Lot 1, Section 44, Victoria District, Plan 4290.
Lot 2, Section 44, Victoria District, Plan 4290.
Lot A, Section 44, Victoria District, Plan 16822.
Lot 1, Section 44, Victoria District, Plan VIP69137.
Parcel A (DD 39811W) of Block G, Section 44, Victoria District, Plan 501.
Block G, Section 44, Victoria District, Plan 501 except the Northerly 5.23 Chains; the land the title to which is hereby registered having a frontage of 5.62 chains more or less, on Cadboro View Road.
Lot B, Section 44, Victoria District, VIP71709.
Lot 2, Section 44, Victoria District, Plan 4841, Except that part commencing at the most easterly corner of said Lot; thence north westerly along the north easterly boundary of said Lot a distance of 60 feet; thence south westerly and parallel to the south easterly boundary of said Lot a distance of 100 feet; thence south 70

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degrees 37 minutes west a distance of 66 feet; thence south easterly along a straight boundary to a point on the said south easterly boundary distant 192.6 feet from the said most easterly corner; thence north easterly along the said south easterly boundary to the point of commencement, and except part in Plan VIP62177.

Owner(s):	Ian and Daphne Izard, Cynthia Henry, James and Gail Evans, Leslie Glazier, Will and Katy Maxwell, Walter Jackson, Kevin Cuddihy and Erica Kjekstad.
Applicant:	Kevin Cuddihy
Application(s) Received:	August 10 to 16, 2016
Parcel Size(s):	Between 0.1972 and 1.0798 hectares each
Existing Use of Parcel(s):	Single Family Dwellings
Existing Use of Adjacent Parcels:	See Figure 1
Current Zoning:	RS-16 (Single Family Dwelling) Zone
Minimum Lot Size:	N/A
Proposed Zoning:	No change proposed
Proposed Minimum Lot Size:	N/A
Local Area Plan:	Cadboro Bay
LAP Designation:	Residential

PROPOSAL

The applicant is requesting that the subject properties be removed from one Environmentally Significant Area of the Environmental Development Permit Area (EDPA). These properties were originally included in the EDPA to provide enhanced protection to the Terrestrial Herbaceous Sensitive Ecosystem type.

The request is based on the submission of a biologist report which states there is no sensitive ecosystem present.

PLANNING POLICY

Official Community Plan (2008)

4.1.2.1 "Continue to use and update the 'Saanich Environmentally Significant Areas Atlas' and other relevant documents to inform land use decisions."

- 4.1.2.3 “Continue to protect and restore habitats that support native species of plants, animals and address threats to biodiversity such as invasive species.”
- 4.1.2.4 “Protect and restore rare and endangered species habitat and ecosystems, particularly those associated with Garry Oak ecosystems.”
- 4.1.2.5 “Preserve ‘micro-ecosystems’ as part of proposed development applications, where possible.”
- 4.1.2.7 “Link environmentally sensitive areas and green spaces, where appropriate, using ‘greenways’, and design them to maintain biodiversity and reduce wildlife conflicts.”

Cadboro Bay Local Area Plan (2008)

- 6.4 “Seek opportunities to preserve and restore ecosystems, which include indigenous trees, shrubs, plants and rock outcrops within open space, parks, boulevards, unconstructed road rights-of-way, and other public lands, as well as on private land.”

General Development Permit Area Guidelines (1995)

1. “Major or significant wooded areas and native vegetation should be retained wherever possible.”

Environmental Development Permit Area Guidelines (2012)

- 1.b.i) and iv) “Development within the ESA shall not proceed except for the following: Proposals that protect the environmental values of the ESA including:
- the habitat of rare and endangered plants, animals and sensitive ecosystems”
2. “In order to minimize negative impacts on the ESA, development within the buffer of the ESA shall be designed to:
- Avoid the removal/modification of native vegetation;
 - Avoid the introduction of non-native invasive vegetation;
 - Avoid impacts to the protected root zones of trees within the ESA;
 - Avoid disturbance to wildlife and habitat;
 - Minimize the use of fill;
 - Minimize soil disturbance;
 - Minimize blasting;
 - Minimize changes in hydrology; and
 - Avoid run-off of sediments and construction-related contaminants.”
3. “No alteration of the ESA will be permitted unless demonstrated through professional environmental studies that it would not adversely affect the natural environment. Prior to the issuance of a development permit, the following information may be required:
- A sediment and erosion control plan;
 - An arborist report according to the “Requirements For Plan Submission and Review of Development or Building Related Permits” (Saanich Parks);
 - A biologist report;
 - A surveyed plan; and/or
 - A bond.”

4. "The following measures may be required to prevent and mitigate any damage to the ESA:
 - Temporary or permanent fencing;
 - Environmental monitoring during construction;
 - Demarcation of wildlife corridors, wildlife trees, and significant trees;
 - Restricting development activities during sensitive life-cycle times; and
 - Registration of a natural state covenant."

5. "Revegetation and restoration may be required as mitigation or compensation regardless of when the damage or degradation occurred."

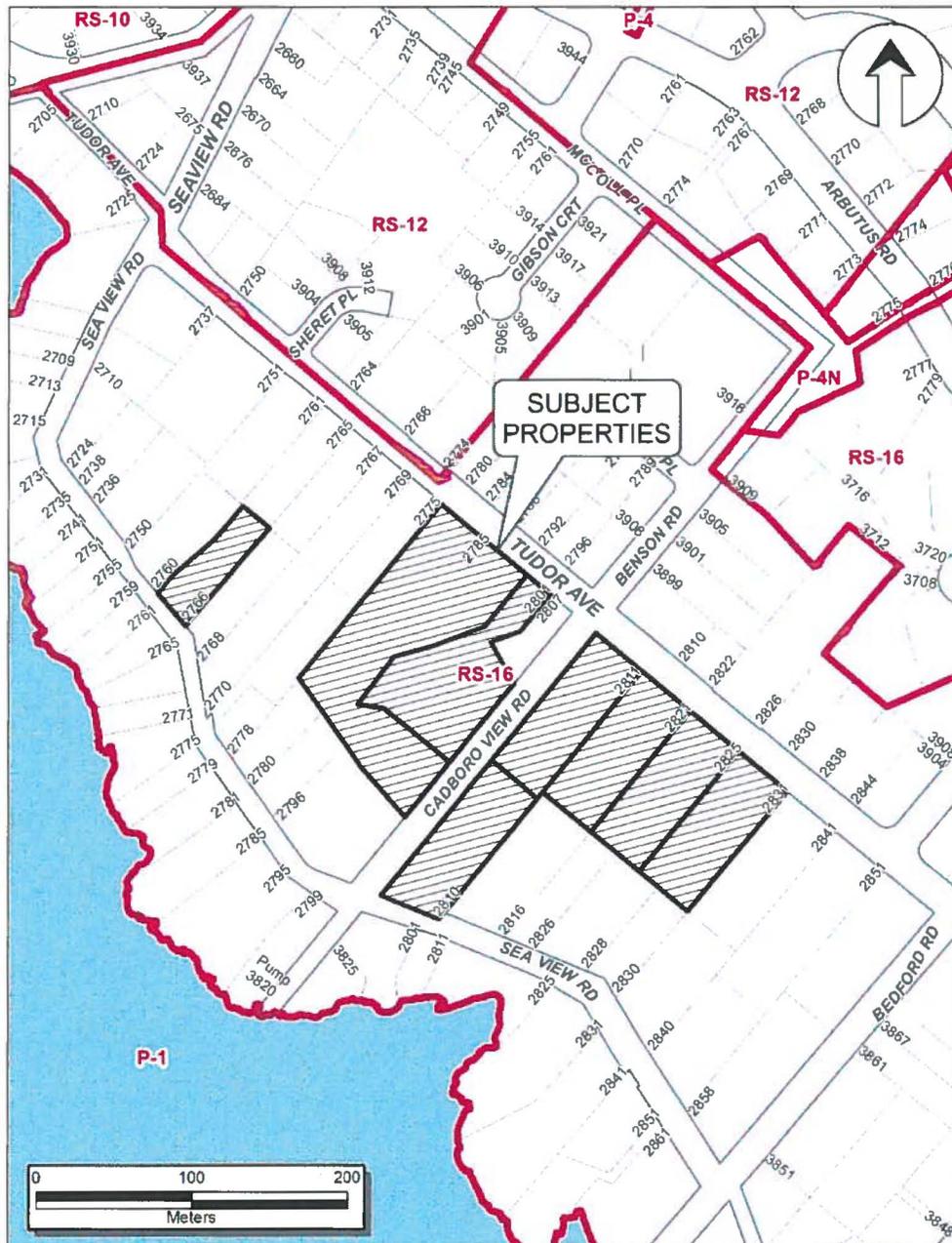


Figure 1: Context Map

BACKGROUND

Environmental Development Permit Area

The Environmental Development Permit Area (EDPA) was adopted by Council in 2012. Part of the EDPA Bylaw is the EDPA Atlas which illustrates the location of five Environmentally Significant Area inventories and associated buffers on properties in Saanich. As with the Streamside Development Permit Area (SDPA), it is acknowledged that the EDPA Atlas will need to be maintained and updated over time.

There are four ways mapping inaccuracies can be approached according to the EDPA Guidelines:

1. Exemption #14 allows for a professional to refine boundaries of an Environmentally Significant Area and potentially proceed without an Environmental Development Permit if a development proposal is shown to be outside of the Environmentally Sensitive Areas. This exemption was designed to avoid undue process or delays for applicants where mapping could be improved.
2. Exemption #15 allows for intrusions into the EDPA where covenants are used to secure comparable natural features which were not previously mapped.
3. As with the SDPA, staff collate proposed EDPA mapping changes as property owners note inaccuracies (which are documented by staff) or biologists hired during the development application process do a more detailed assessment. These changes are brought forward in batches to Council as recommended amendments.
4. Where a proposed mapping amendment is outside of the scope of these provisions, Council approval is required.

The applicants are seeking Council approval to remove the EDPA designation (both Environmentally Sensitive Areas and buffer zone) from the properties (Option 4, above).

As such, this report has been prepared for Council's review and consideration. If Council believes the removal request has merit, a Public Hearing on the matter would need to be called.

Council adopted a motion on May 9, 2016 to endorse Terms of Reference for the hiring of a consultant to develop potential solutions in relation to the application of the/an EDPA in Saanich. The Terms of Reference include a public consultation component as part of the development of potential solutions. It is possible that the outcomes of the review may impact the EDPA on these properties.

The Environment and Natural Areas Committee has not considered this request.

Existing EDPA Mapping

The EDPA on the subject properties is in reference to one Environmentally Significant Area (ESA): Terrestrial Herbaceous (see Figure 4).

The Terrestrial Herbaceous ecosystem is part of the Provincial/Federal Sensitive Ecosystem Inventory (SEI). The Ministry of Environment states that Sensitive Ecosystem Inventory areas are often ecosystem remnants and have many values because they:

- Provide critical habitat for species at risk and include ecosystems at risk;
- Are biologically diverse;
- Provide wildlife corridors and linkages;
- Bring nature into communities;
- Provide recreational opportunities;
- Support learning environments;
- Create economic benefits; and
- Are a legacy for future generations.

Specifically, Terrestrial Herbaceous is described as:

- Occurring in very small patches;
- Dominated by grasses and mosses;
- Thin-soiled with exposed bedrock;
- Containing introduced grasses and threatened by Scotch Broom;
- Supporting sparse tree and shrub growth;
- High bird and butterfly use, and very high invertebrate production; and
- Found in only 1.5% of the land base within the Capital Region.

The EDPA includes a 10 m buffer for the Terrestrial Herbaceous Environmentally Sensitive Areas. Property owners can apply for a permit to develop within the buffer area.

Terrestrial Herbaceous ecosystems are considered part of the rare Garry Oak and associated ecosystems mosaic.

This same area has been mapped by the Provincial Government as part of the Coastal Douglas-fir Terrestrial Ecosystem Mapping produced in 2008. It is classified as Garry Oak-Brome/mixed grasses (note that Brome refers to a native grass) and is slightly larger in area than shown by the Sensitive Ecosystem Inventory mapping.

As part of the Environmentally Sensitive Areas Mapping Initiative in 2012, the public land within this Terrestrial Herbaceous mapped area was assessed by a biologist who recommended that Saanich develop an invasive species management plan in order to protect the adjacent Terrestrial Herbaceous ecosystem. The biologist evaluated the Terrestrial Herbaceous ecosystem as being in fair to good condition despite the presence of Scotch Broom. The inventory was completed in early April, which is an appropriate time to survey this type of ecosystem, and a variety of breeding birds were noted including songbirds, raptors, and cavity-nesters.

The same biologist was requested by Saanich to revisit the site to comment on its condition and if the mapped area is still viable Terrestrial Herbaceous. Her findings were that there has been some expansion of invasive species from the Benson Road Right-of-way but that the integrity of the Terrestrial Herbaceous ecosystem is in a relatively natural state. She concludes that the mapped area meets the Sensitive Ecosystem Inventory criteria and is Terrestrial Herbaceous, and notes that it is the largest one in the area. Recommendations include working with the neighbourhood to manage invasive species on public and private land. The report was peer-reviewed by Richard Hebda, Ph D.

Three current or retired Federal and Provincial staff who were responsible during the establishment of the Sensitive Ecosystem Inventory inventory have provided general comments:

- This Terrestrial Herbaceous mapped area is a mosaic of Terrestrial Herbaceous, rock outcrop and Garry Oak Woodland;
- From aerial photo analysis and photographs, this area is a Sensitive Ecosystem;
- An evaluation of an Terrestrial Herbaceous area needs to be completed in the early spring as percent cover of invasive versus native species can be substantially different at this time.
- Application of the Sensitive Ecosystem Inventory methodology can be subjective when it comes to determining what is “relatively natural”.
- The EDPA did not adopt Sensitive Ecosystem Inventory standards and does include goals for restoration.

The applicant did not give authorization for Saanich staff to visit any of the properties. However, there is a public right-of-way intersecting the Terrestrial Herbaceous area. Staff observed that the Terrestrial Herbaceous ecosystem definitely does exist and supports more Garry Oak trees than normally represented. However, there are patches of dense invasive species cover near the public land, and small broom plants scattered in many sections. More importantly, the core area is still intact and supports wildlife habitat and the moss cover consistent with Terrestrial Herbaceous. The ecosystem would benefit from regular broom cutting/pulling. Figures 2 and 3 are photographs taken by staff of the core Terrestrial Herbaceous polygon from public land.



Figures 2 & 3: Photographs of the core Terrestrial Herbaceous Ecosystem

Other Environmentally Sensitive Areas located within or adjacent to the Terrestrial Herbaceous are: Sheep Cove Creek, an active Bald Eagle nesting site, the marine backshore, natural parks, and two occurrences of a rare plant species (Twisted Oak Moss). The mapping for the moss is approximate however, the CDC notes that “relative to others in B.C., this is a large population over a large area” with “good estimated viability”. The location of the rare moss is within the subject Terrestrial Herbaceous mapped area.

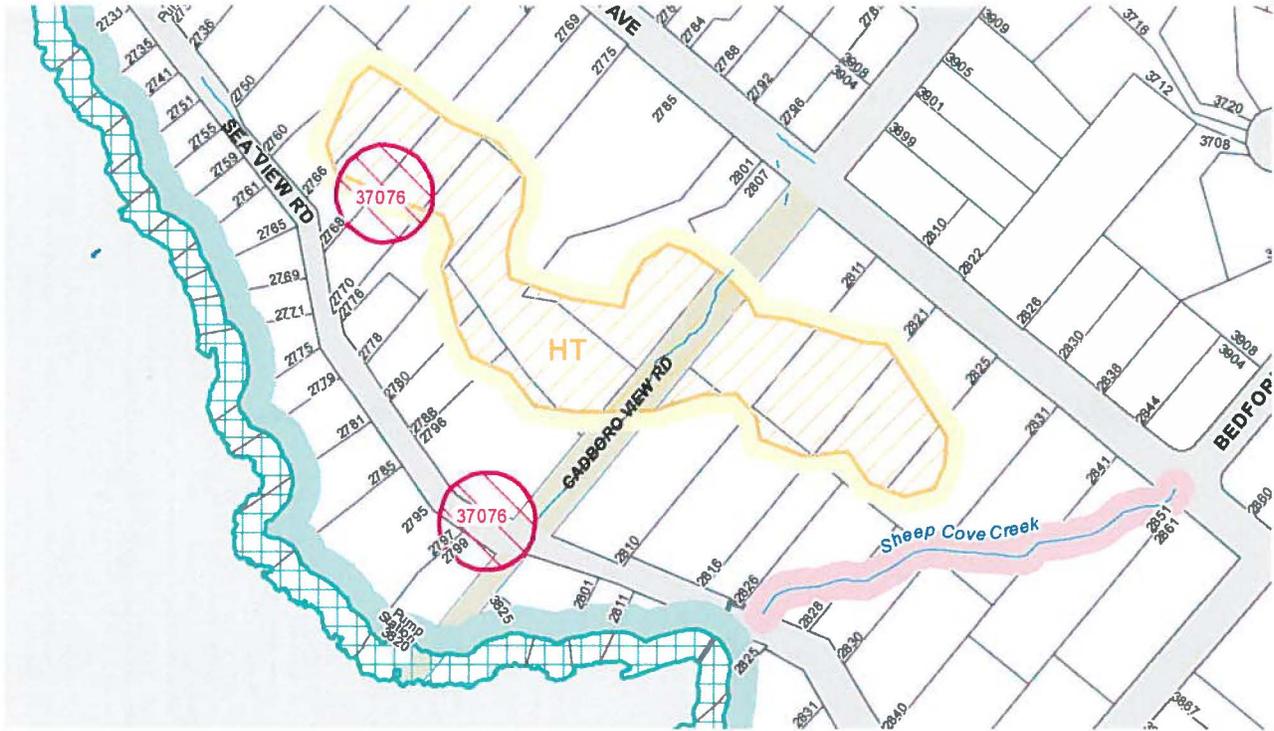
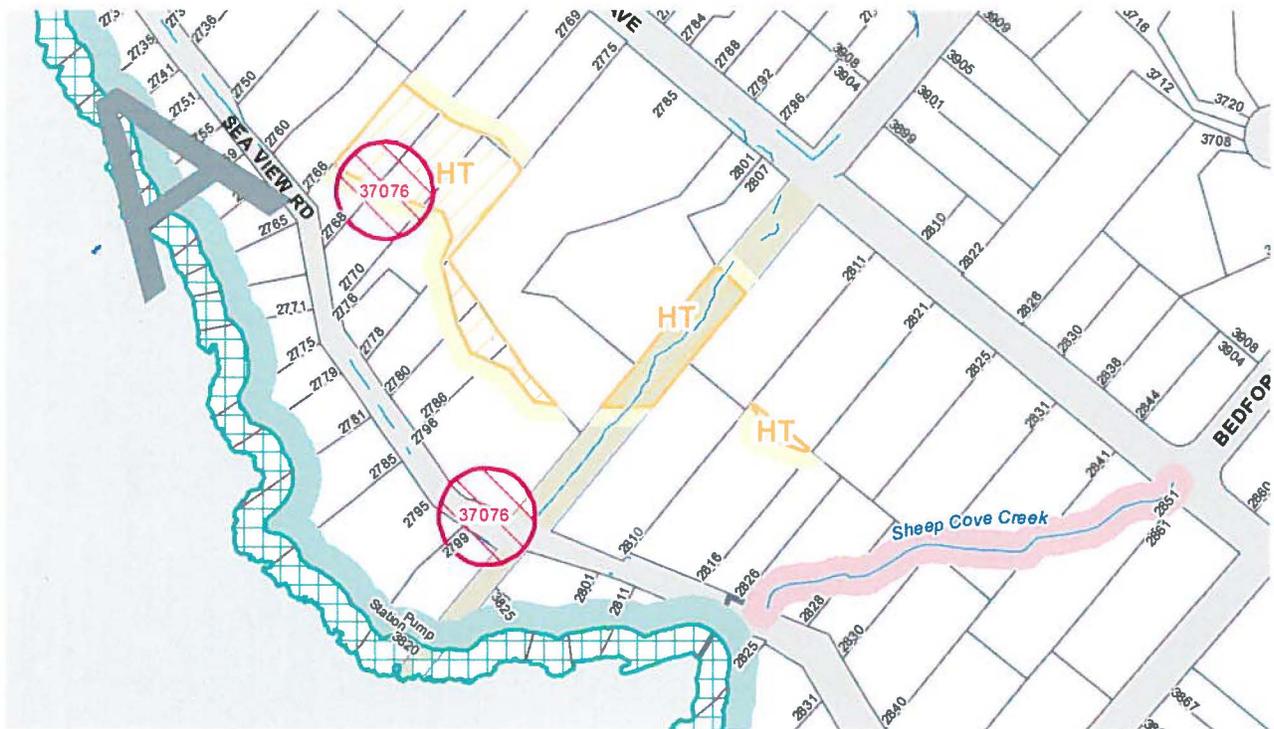


Figure 4: Existing Terrestrial Herbaceous EDPA Mapping



Figures 5: Proposed EDPA Mapping

Removal Request

The applicant has requested the Environmentally Sensitive Areas and associated buffer be removed from their property based on the opinion of their consulting biologist that there is no sensitive ecosystem on the properties. Figure 5 illustrates the EDPA mapping should Council remove the Terrestrial Herbaceous Environmentally Sensitive Areas and buffer from the properties.

The letter report by Mr. Lea describes the map unit marked as Terrestrial Herbaceous which falls on the properties in question. His site visit took place in late May/early June 2016. Native species which he found present within the polygon included Camas, Hooker's onion, Blue Wildrye, and native mosses. Invasive species which were found included Scotch Broom, Himalayan Blackberry, Periwinkle, English Ivy and invasive grasses. The property at 2766 Sea View Road was found to have a more dense Garry Oak cover than the other properties but all had at least a sparse cover of Garry Oak.

According to Mr. Lea, the properties do not meet the definition of an Environmentally Significant Area because they are dominated by invasive species and there are few native species. In addition he states that the property "does not support an ecological community that can be considered provincially at risk by the BC Conservation Data Center." Mr. Lea also states that restoration would be very difficult. In the letter report by Ted Lea, it is stated that some of the landowners have endeavoured to control invasive species over the years.

Staff biologists do not agree with the report by Ted Lea due to the inappropriate time of year that the work was completed, the focus on the presence of invasive plants, the lack of an assessment of habitat, the lack of a complete inventory, and the lack of acknowledgement of the known rare species in the mapped area. "Annual brome grasses" are stated to dominate throughout the area in the report, but they are not identified to show if any are native or invasive. Mr. Lea's letter report generalizes about the map unit but he has not visited all of the properties. Mr. Lea confuses Biogeoclimatic Ecosystem Classification standards in his report as being the relevant standard and that the Provincial Conservation Data Centre at-risk ecological communities are also a Sensitive Ecosystem Inventory determinant, which they are not. Inventory methods are not consistent with the Best Management Practices for Garry Oak & Associated Ecosystems produced by the Garry Oak Ecosystems Recovery Team.

Ted Lea states that "...some of the very shallow areas have a dense cover of native moss species that are still in good condition..." but does not identify the mosses or comment that rare mosses are known to this Terrestrial Herbaceous area according to the Provincial Conservation Data Centre.

It should be noted that an active Subdivision application for a boundary adjustment is being considered by the Approving Officer for 2801 and 2785 Tudor Avenue. While the current owners have not expressed a desire to further subdivide either new proposed parcel, the proposed new 2801 Tudor would have the area to create an additional lot. An additional lot would result in the loss of many Garry Oak trees and Terrestrial Herbaceous ecosystem in both the public right-of-way and on private property. The owners have not offered to covenant the core Terrestrial Herbaceous ecosystem. Without the EDPA, there would be no protection for the ecosystem or trees if developed.

OPTIONS

- 1) Do not support the request to remove the properties from the Environmental Development Permit Area.
- 2) Support the request to remove the Environmental Development Permit Area on the properties from the EDPA Atlas.
- 3) Postpone a decision on this application pending the outcome of the final phase of the EDPA "check-in" which would be undertaken by the independent consultant.

Staff recommend Option 1 for the following reasons:

- Saanich Official Community Plan policies support the protection and restoration of Environmentally Sensitive Areas in this area;
- There is a known rare species documented in the mapped area;
- Biologists have mapped and confirmed the Terrestrial Herbaceous ecosystem;
- The owners are able to continue to maintain and use their property as they are accustomed;
- Improvements as a result of the EDPA consultant review may help to address some of the concerns of the owners.

SUMMARY

The owners of eight properties on Tudor Avenue and Sea View Road have requested removal of the EDPA from their properties. The properties all contain some portion that falls within the Terrestrial Herbaceous Environmentally Sensitive Areas as mapped in the EDPA atlas. The request is based mainly on the presence of invasive species.

Staff biologists believe that the core of the ecosystem is intact and providing habitat. The same area has been mapped by the Provincial Government in 2008 and was evaluated as in fair to good condition in 2012. A rare species is known to occur in the mapped area. Any rare species in the mapped area would no longer be protected if the EDPA was removed as they have been since approximately 1998. A peer-reviewed biologist report confirms that the mapped area meets the criteria of Sensitive Ecosystem Inventory and is an Terrestrial Herbaceous ecosystem.

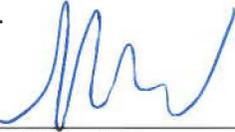
RECOMMENDATION

That Council support Option 1.

Note: If Council wishes to support the removal request at this time, the motion would be as follows:

That staff be requested to prepare an amendment to Plate of Schedule 3 to Appendix N of the Official Community Plan Bylaw, 2008, No. 8940 for the removal of the Terrestrial Herbaceous Environmentally Sensitive Areas and associated buffer at 2785, 2801, 2811, 2821, 2825, 2831 Tudor Ave and 2766, 2810 Sea View Road from the Environmental Development Permit Area Atlas, and that a Public Hearing be called to consider the amendment.

Report prepared by:



Adriane Pollard, Manager of Environmental Services

Report reviewed by:



Sharon Hvezdariski, Director of Planning

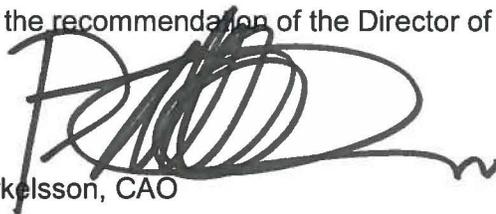
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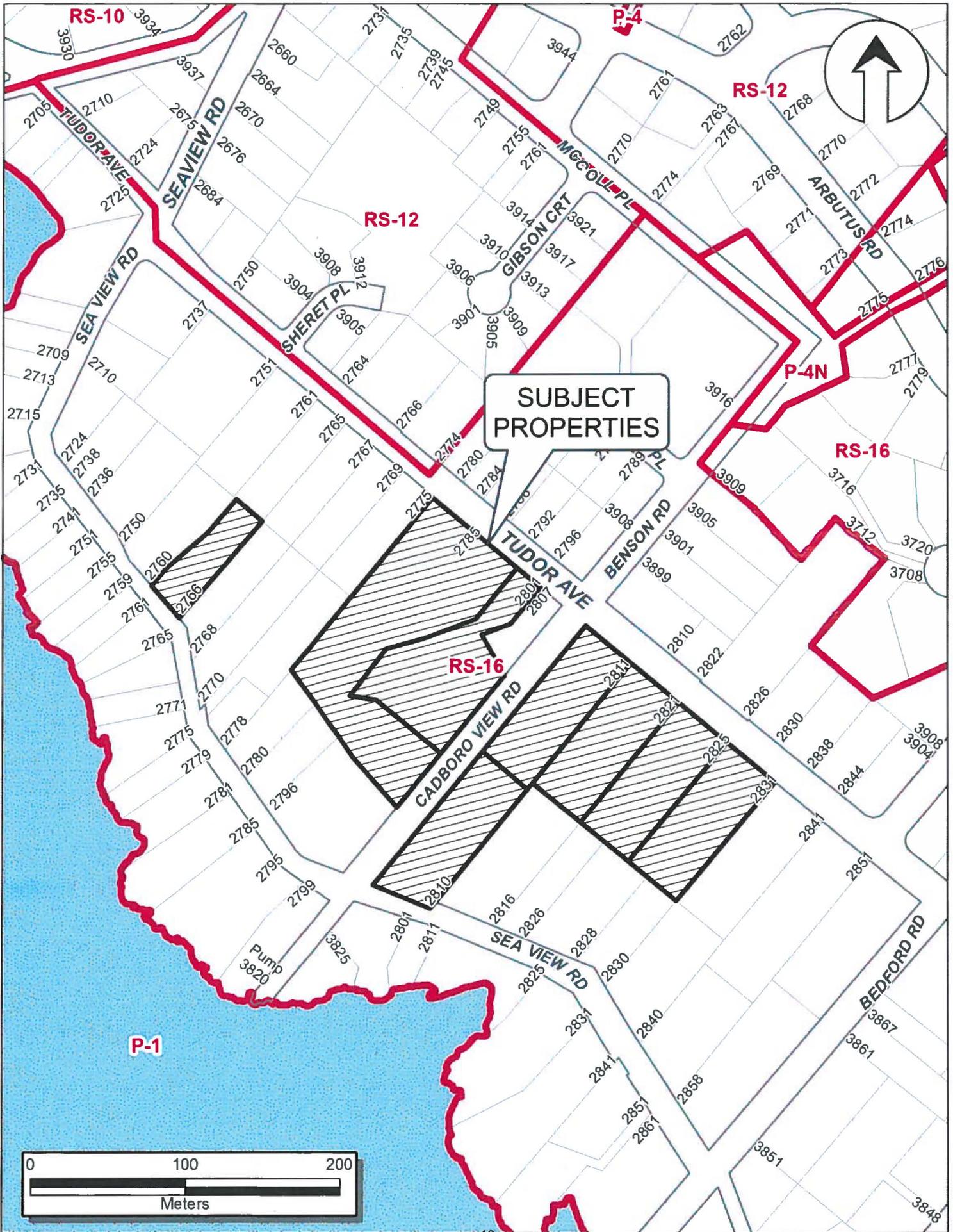
Attachments

cc: P. Thorkelsson, CAO

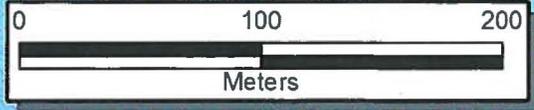
CAO'S COMMENTS:

I endorse the recommendation of the Director of Planning


Paul Thorkelsson, CAO



SUBJECT PROPERTIES



Adriane Pollard - M. Grau report Visual field assessment of Sensitive Ecosystem Inventory.... Sea View Rd. and Tudor Ave.

From: "Richard Hebda" [REDACTED]
To: <Adriane.Pollard@saanich.ca>
Date: 11/27/2016 9:31 AM
Subject: M. Grau report Visual field assessment of Sensitive Ecosystem Inventory.... Sea View Rd. and Tudor Ave.
CC:

TO: Adriane Pollard
Manager of Environmental Services.
District of Saanich
770 Vernon Ave.
Victoria, BC V8X 2W7

Dear Adriane:

I read Moraia Grau's report on the classification of the Benson Rd. Right of Way and adjacent lands. I am somewhat familiar with this SEI area. In my opinion, her classification of it as a Herbaceous Terrestrial unit having restoration potential under the SEI classification is appropriate. A good indicator of this is the presence of camas, but also the general conditions of shallow soils in rocky outcrops and the widespread occurrence of Garry oaks and native shrubs.

I note that in my experience at Government House, and Oak Haven Park, if keystone species such as camas and native shrubs persist the restoration potential is very high and achievable despite the apparent occurrence of invasive shrubs and grasses. Persistence of Licorice-root fern on rocky outcrops is another good indicator of this potential. In these cases removal of invasives is the key action and little replanting is necessary.

Richard Hebda Ph D.

**Visual field assessment of Sensitive Ecosystem Inventory
Herbaceous Terrestrial polygon extending
along Seaview Rd and Tudor Ave properties**

Submitted to:

Adriane Pollard
Environmental Services Manager
The Corporation of the District of Saanich

Prepared by

Moraia Grau MSc
PO Box 118
Silverton, B.C. V0G 2B0

Oct. 29, 2016

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Appendix I. Conservation Value Criteria	

1. Introduction

The "Sensitive Ecosystem Inventory (SEI): East Vancouver Island and the Gulf Islands" was a joint classification and mapping project coordinated and carried out by representatives of the Canadian Wildlife Service, BC Ministry of Environment, Lands and Parks, Nanaimo and the B.C. Conservation Data Centre. The objective of the SEI was to classify, identify, and map **terrestrial ecosystems and other habitats of high biodiversity, which still remained relatively unmodified** despite intense development pressure in these regions, with the objective of supporting management decisions and promoting ecological conservation and land stewardship" (Ward *et al.*, 1998). The inventory was finalized in 1998. A review and mapping update was carried out in 2004. Since that time the municipalities included in the SEI mapping have been charged with the task of preserving the sites under their respective jurisdictions.

My involvement with the SEI started in 1998, when I helped review and redefine polygon sites on aerial photos and carried out field reconnaissance of sites in the summer of 2000. In recent years I have worked for the District of Saanich on the Environmentally Significant Areas project, and I have been a Registered Professional Biologist (RPBio) from 2003 to 2015.

2. Objective

The purpose of this report is to describe and provide feedback on the condition of the Herbaceous Terrestrial (HT) SEI site occurring on properties 2766, 2768, 2770, 2776, 2780, 2786, 2796, 2810 and 2816 Seaview Rd. and 2785, 2801, 2811, 2821, 2825 and 2831 Tudor Ave., and the Benson Rd. undeveloped right-of-way (fig.1).

3. Method

The site includes portions of fifteen private properties and the District of Saanich undeveloped right-of-way at Benson Rd. (figure 1). I visited this site on April 9, 2012, while working on the Environmentally Significant Areas project. At that time the main objective of the assessment was the ecological condition of the Benson Rd. trail allowance (20m wide).

The Benson Rd. footpath crosses and divides the mapped SEI site approximately in half, to the East and to the West of the trail, and provides a vantage point to the central part of the site. As I had visited and assessed the area four years ago, and asking permission to enter private properties would have taken time and delay the visit, I decided to compare my previous notes and assessment with a visual evaluation from the footpath.

4. Results

On April 9, 2012, the impact of invasive species was evident along the trail's allowance. Periwinkle (a thick patch) and Scotch broom were the most abundant species. The tree and shrub layer was represented by approximately equal cover of Garry oak, ocean spray and Nootka rose, and a lesser presence of Himalayan blackberry, common privet and daphne laurel. A cotoneaster thicket was also observed nearby. The most abundant herbaceous species were orchard grass, common camas, and Spanish bluebells, followed by henbit dead-nettle, cleavers, and minor presence of dandelion,

daffodils, and creeping buttercup. In addition, a heavy infestation of English ivy was noted along the path and on the neighboring property (2801 Tudor Ave) around some dead and dying Garry oak trees (Qg). Drainage works observed along the trail may have disturbed subsurface flow and affected the Garry oaks. Blackberry bushes and other invasive species were mostly on the storm drain and along the foot path (photos 1-4).

The properties on both sides of the trail showed grassy areas interspaced with moss covered rock outcrops. Large and stunted Garry oaks, patches of ocean spray, wild rose, snowberry and camas, could be seen from the footpath throughout the grass meadows (photos 5-10). The main exotic species was orchard grass, as Scotch broom was sparse and did not have as much cover. Other species found along the path such as daffodils were noticed on the private properties. Mosses included roadside rock moss, hoary rock moss and Oregon beaked moss.

Many bird species were also noted in the relatively short time of the visit: spotted towhees, chesnut-backed chickadees, yellow-rumped warbler, a downy woodpecker on a dead Garry oak, and a bald eagle, which had its nest on a large Douglas-fir nearby.

Under the direction of the Saanich Advisory Committee, the assessment method used to evaluate these urban sites was a modified version of the CDC Conservation Evaluation Form, in which the Evaluation Summary field "Ecological Integrity" was replaced by "Restoration Potential." In a four degree scale of Conservation Value (Excellent, Good, Fair and Poor), the evaluation of the undeveloped r-o-w allowance together with adjacent nearby areas was determined to be Fair (50% of the surrounding landscape fragmented, 40-75% cover of exotic species but moderate internal fragmentation, and several years of restoration work needed). Appendix I shows the Conservation Value criteria applied.

The second visit on September 27th consisted of a visual reconnaissance of the properties to the east and west of the foot path allowance. Given the timing of the assessment, when most of the herbaceous vegetation had dried up, the main objective was to assess the condition of the HT site compared to the previous visit, particularly in reference to the invasive species periwinkle, English ivy, Himalayan blackberry, and Scotch broom.

The periwinkle and English ivy infestations noted on the path allowance four years ago have expanded and extended into the properties adjacent to the path. However, only two sections of two properties within the HT site were seen affected by the expansion:

- at 2801 Tudor Ave., the periwinkle infestation has expanded over the south corner of the property under Garry oaks; and
- a large patch of English ivy at 2796 Seaview Rd. (south of the site) may be affecting a portion of the HT at 2785 Tudor Ave. (southeast corner).

Similarly, blackberry bushes were found on the ditch along the sides of the foot path as before, but in some areas the patches have extended into neighboring properties. Scotch broom did not seem to have increased in abundance from the previous visit, isolated plants remaining interspaced throughout the grassy areas.

The meadows and rock outcrops on both sides of the trail (2785, 2801, 2811, and 2821 Tudor Ave.) seem to have maintained similar characteristics as before: moss covered rock outcrops and grassy areas with an obvious component of orchard grass and scattered Garry oaks, ocean spray, wild rose, and Scotch broom bushes. Licorice fern new fronds were evident on shallow soil and rock crevices. Moss covered rocks included broom moss, awned haircap moss and roadside rock moss. Exotic early

hairgrass was noted on the moss cover. Due to the time of the year and the visual restrictions, the species named do not stand for a comprehensive species list of the HT site.

In addition to the visit, a search on the GIS Saanich Atlas showed the presence of Conservation Data Centre (CDC) at Risk Element Occurrence Code 37076 -Twisted Oak Moss, on properties 2668 and 2770 Seaview Rd. both within the HT site. Photos 1 through 6 show vegetation and physical characteristics of the HT site on the properties visually accessible from Benson Rd. foot path.

5. Discussion

The Sensitive Ecosystem Inventory describes HT ecosystems as sites where "the predominantly herbaceous vegetation is continuous except where interspaced with bare rock outcrops. The low tree and shrub cover characteristic of this ecosystem type is a result of shallow and rapidly draining conditions. Summer heat and light create drying conditions (Mc Phee *et al.* 2000)." In addition, SEI recognized three types of HT:

- a) HT; less than 10% tree cover and less than 20% shrub cover
- b) HT:ro; grass-forb areas interspaced with rocky outcrops
- c) HT:sh; grass-forb areas with more than 20% shrub cover

The physical attributes of these sites are described as: gentle to moderately sloped (<30% slope), exposed and open, dry sites, typically thin soiled, with pockets of deeper soil which may support sparse trees, with bedrock exposed as rock outcrops, located outside the salt spray zone, near shorelines to the summits of local hills in the study area (South and Eastern Vancouver Island and the Gulf Islands). All these characteristics apply to the site between Tudor Ave. and Seaview Rd. and would identify it as a HT:ro.

The SEI notes the importance of this type of ecosystem due to its fragility (thin soils are easily disturbed and herbaceous plants are easily trampled), high biodiversity and the occurrence of specialised microhabitats. Typical species of these sites are various species of snakes (Garter and the at risk Sharp-tailed Snake), birds (Lincoln's, Savannah and Song sparrows, and potentially Vesper Sparrow and Streaked Horned Lark), mammals (voles, mice, shrews), which in turn attract predators such as raptors. They are also important habitats for invertebrate production, such as butterflies, including Anise Swallowtail and the endangered species Zerene fritillary, and other insects which attract aerial insectivores such as swallows, flycatchers and bats to these sites (Mc Phee *et al.* 2000).

It is important to mention that the SEI classification does not use defined vegetation or physical parameters as other Provincial ecological classifications, such as CDC Ecological Communities at Risk or Terrestrial Ecosystem Mapping (TEM) units. These latter classification and mapping systems are based on the Biogeoclimatic Ecosystem Classification (BEC) of British Columbia, which uses elevation, soil nutrient and soil moisture regimes, as well as vegetation, as defining parameters. However, CDC Ecological Communities at Risk and TEM units are not equivalent. The CDC Ecological Communities at Risk are mapped according to "plant association", whereas the TEM polygons are based on "site series" (or sometimes map units are created specifically for TEM projects).

SEI sites are often a grouping of ecosystems not defined by a fixed vegetation species cover criteria. The reason behind the SEI classification was the recognition and flagging of specific habitat types threatened specifically by development, be it urban, industrial, agricultural, or recreational. Therefore sites may occur in a relatively natural or in a relatively more disturbed state. The SEI site between Tudor Ave. and Seaview Rd. falls within the description of "a relatively natural" HT site; i.e. an HT site

affected by a certain degree of invasive species, yet an HT site nevertheless.

We could reflect on other HT sites which at one time were affected by invasive species in larger amounts than they are now, and those areas were always considered SEI HT sites, even prior to the restoration programs. For example, Mount Tolmie had a higher cover of Scotch broom and Himalayan blackberry, than the Seaview-Tudor site, and a much higher deterioration on meadows and rock outcrops because of trampling by walkers and dogs. In a less than pristine condition were many other important HT sites in the Victoria area such as Government House. However, the ecological condition of Mount Tolmie, Government House, and other Saanich and Victoria Parks, was improved by ecological restoration activities, which often did not involve plantings. The removal of invasive species allowed the re-emergence of native species typical of these ecosystems such as camas, shooting stars, lilies, and others. As has been discovered in various sites around Victoria, control and removal of invasive species leads to widespread emergence of native species. Just because some species are not visible, it does not mean they are not there.

In addition, it's important to note that plants are just a reflection of other biological diversity, such as invertebrates, fungi, microorganisms, and others. These HT communities are the template for all this other biological diversity. If these spaces are not available, then there are no opportunities for this natural heritage to persist. As can be seen in figure 2, this site because of its size is a focal point in the context of Ten Mile Point's sensitive ecosystems (Coastal Bluffs around the coast). Other HT sites exist in Ten Mile Point although they are not mapped possibly because of their smaller size. At the landscape level, maintaining these relatively larger sites of natural habitat is important. The large bird activity observed at the Benson Rd. HT site and the CDC mapped Element Occurrence are also indicative of the ecological value of the site.

6. Recommendations

My recommendation to Saanich council is that the District of Saanich provide help to property owners to preserve these valuable SEI sites, through covenants, tax relief and/or grants to help with restoration/maintenance costs, similarly to the help provided to care for Significant Trees. Also, it is recommended that the District of Saanich consistently uses natural restoration practices in areas under the District's jurisdiction, in particular those affecting SEI sites such as Benson Rd. r-o-w. In addition, the restoration activities should be used to promote the involvement of neighboring property owners in the project, for example, with the use of education leaflets, and/or other means, previous to the restoration work.

7. Literature cited

McPhee, M., P. Ward, L. Kirkby, L. Wolfe, N. Page, K. Dunster, N.K. Dawe and I. Nykwist. 2000. Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands, 1993-1997. Vol. 2: Conservation Manual. Technical Report Series No. 345. Canadian Wildlife Service, Pacific and Yukon Region, British Columbia.

Ward, P., G. Radcliffe, J. Kirkby, J. Illingworth and C. Cadrin. 1998. Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands, 1993 - 1997. Volume 1: Methodology, Ecological Descriptions and Results. Technical Report Series No. 320. Canadian Wildlife Service, Pacific and Yukon Region, British Columbia.

List of Figures

Fig. 1. Airphoto showing HT site 1:2,000

Fig. 2. Airphoto showing Ten Mile Point SEI sites 1:8,000

District of Saanich Map



Legend

- Sensitive Ecosystem Inve
- Conservation Data Centre
- Wildlife Tree Area (WITs)
- Building
- Municipal Boundary
- Streets**
- Other
- Highway
- Major
- Collector
- Water Course**
- Man-made
- Natural
- Water Body
- Parks
- Parcel

Date Produced
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1: 2,000

This map is for general information purposes and should not be considered authoritative for any purpose. Accuracy, currency and precision are not guaranteed.

District of Saanich Map



Legend

-  Sensitive Ecosystem Invertebrates
-  Conservation Data Centre
-  Wildlife Tree Area (WITs)

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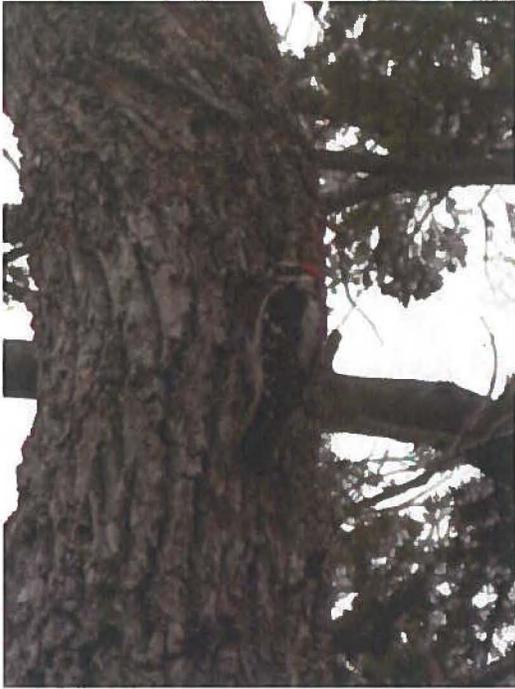
1: 8,000

This map is for general information purposes and should not be considered authoritative for any purpose. Accuracy, currency and precision are not guaranteed.

Photographs



Photos 1-2. April 9, 2012. View of the SEI herbaceous terrestrial ecosystem from the Benson Rd. foot path. Drainage ditch with blackberry bushes and moss covered rock in foreground; rock outcrops, grass meadows and Garry oaks on the background.



Photos 3 and 4. Old Garry oak drying out covered with English ivy and with Downy wood pecker activity.



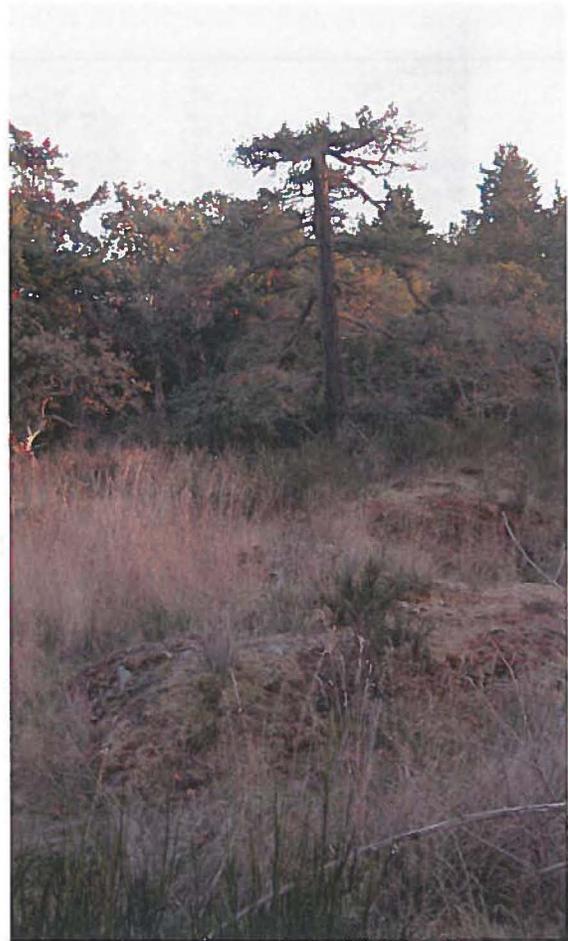
Photo 5. View of Benson Rd. undeveloped right of way. Sides of path with exotic species: periwinkle, English ivy and Himalayan blackberry.



Foto 6. View of the HT site east of foot path: interspaced rock outcrops and meadows, with orchard grass, some Scotch broom and scattered Garry oaks.



Foto 7. View of the HT site west of foot path: rock outcrop, grass meadow, Garry oaks and Scotch broom.



Photos 8 and 9. View of the site to the east of foot path: rock outcrops and grass meadow, with black hawthorn and Scotch broom shoots on foreground; Douglas fir and Garry oaks on background.



Foto 10. Moss covered rock: broom moss and rock roadside moss.



Foto 11. New fronds of licorice fern next to path.

Appendix I
Conservation Value Criteria

Conservation Value Assessment

Landscape context	
Excellent – Score 4	The surrounding landscape has <25% fragmentation due to roads, urban areas, and rural settlements, and no recent industrial activity. Site occurs within a larger landscape with some formal protection status or protected by conservation covenants.
Good – Score 3	Up to 50% of the surrounding landscape is fragmented. The larger landscape context provides some protection from anthropogenic disturbance, although changes to natural disturbance regimes exist (fire suppression; flooding control).
Fair – Score 2	More than 50% of the surrounding landscape is fragmented and affected by anthropogenic influences. Development may currently affect the ecosystem's existence.
Poor – Score 1	Less than 15% of the surrounding landscape consists of natural or semi-natural vegetation, or the ecosystem is completely isolated from natural areas and protected areas.
Condition (C)	
Excellent – Score 4	Minor cover of exotic species occur in the site (<10%). Forested ecological communities are climax vegetation. The community may have minor internal fragmentation (<5%). Wetland and riparian communities have natural hydrology regimes. No artificial structures occur at the site.
Good– Score 3	Some cover of exotic species (10 - 40%). Forested ecological communities may be late seral vegetation. Wetland and riparian communities have largely natural hydrology regimes. There could be moderate internal fragmentation (<25%).
Fair– Score 2	Significant cover of exotic species (40 - 75%). Forested ecological communities typically are young seral vegetation after anthropogenic disturbance. There may be significant alterations of hydrology regime in wetlands and riparian ecological communities. There is moderate internal fragmentation (<25%).
Poor– Score 1	Exotic species dominate a vegetation layer or may total >75%. Significant anthropogenic disturbance, such as removal of soil material or vegetation. There are significant alterations to the hydrology regime in wetlands and riparian ecosystems. High internal fragmentation (>25%), presence of artificial structures or barriers.
Restoration potential (R)	
Excellent– Score 4	The natural species, soils and disturbance regime are mostly intact, only a minor control of invasive species is needed.
Good– Score 3	The natural species, soils and disturbance regime are present, but sustained invasive species work is needed to achieve restoration.
Fair– Score 2	Alterations to the natural disturbance regime require major work. The removal of invasive species will leave major portions of exposed soil, requiring plantings. Many years of work will be needed, to achieve a complete natural appearance.
Poor– Score 1	Soils and vegetation were removed, and site is dominated by alien invasive species. Site may be affected permanently.

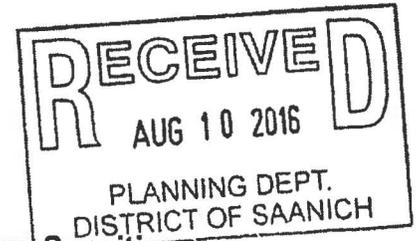
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3

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



**Re: Field Verification and Assessment of Terrestrial Herbaceous ~~Sensitive~~
Ecosystem ESA Mapping at 2766 Seaview Road – Property of Cynthia Henry**

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2766 Seaview Road, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. Some Scotch broom occurs. No wildflowers were seen. A small amount of blue wildrye occurs. The north end of the property has dense Himalayan blackberry, and English ivy with some native Nootka rose. This property has a more dense Garry oak cover than most of this Terrestrial Herbaceous unit.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping*

Ecosystems at Risk and Other Sensitive Ecosystems, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

The Saanich guidelines recommend for a biologist to: "Evaluate each ecological community for ecological sensitivity and at-risk status and determine which class and subclass of Sensitive Ecosystem it belongs to, if any."

I have consulted the two standards recommended by Saanich's 2013 Guidelines document:

- 1) Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, Ministry of Environment, Resources Information Standards Committee, December 5, 2006, Version 1.0
- 2) Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands 1993-1997. Volume 2: Conservation Manual

According to # 1: "Ecosystems at risk are those that can support ecological communities which are considered to be provincially at risk as designated by the B.C. Conservation Data Center. Sensitive Ecosystems are those that are at-risk or are ecologically fragile. The vegetation species composition and structure **must fall within the expected range of the defined plant association before it is considered an occurrence of that particular plant association.** The ecosystem occurrence itself must have sufficient ecological integrity to be sustained in the foreseeable future if it is to have practical conservation value."

According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries

of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

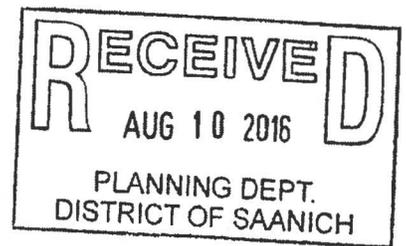
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Justin Henry

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2810 Seaview Road – Property of Ian and Daphne Izzard

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2810 Seaview Road, within the SEI polygon is mostly dominated by a dense cover of invasive shrubs including English ivy, hawthorn, spurge-laurel and periwinkle. There is significant cover of snowberry and scattered individuals of camas, blue wildrye and California brome. A patch of Nootka rose occurs, along with individual oceanspray. The eastern portion has a patch of privet. The northern portion of the property has invasive annual brome grasses as indicated above, including dense orchard grass in deeper soil areas.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems*, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

The Saanich guidelines recommend for a biologist to: "Evaluate each ecological community for ecological sensitivity and at-risk status and determine which class and subclass of Sensitive Ecosystem it belongs to, if any."

I have consulted the two standards recommended by Saanich's 2013 Guidelines document:

- 1) Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, Ministry of Environment, Resources Information Standards Committee, December 5, 2006, Version 1.0
- 2) Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands 1993-1997. Volume 2: Conservation Manual

According to # 1: "Ecosystems at risk are those that can support ecological communities which are considered to be provincially at risk as designated by the B.C. Conservation Data Center. Sensitive Ecosystems are those that are at-risk or are ecologically fragile. The vegetation species composition and structure **must fall within the expected range of the defined plant association before it is considered an occurrence of that particular plant association.** The ecosystem occurrence itself must have sufficient ecological integrity to be sustained in the foreseeable future if it is to have practical conservation value."

According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

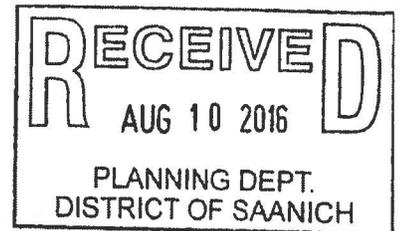
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Ian and Daphne Iazard

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2785 Tudor Avenue – Property of Will and Katie Maxwell

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The lower and eastern portion of the property at 2785 Tudor Avenue, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. There is a significant cover of Scotch broom in the shrub layer. Few wildflowers are present. Moss areas occur in the very shallow areas and have a significant cover of invasive grasses associated with them. At the northwest end there is an area of dense shrub dominated cover of Scotch broom, English ivy, privet, spurge-laurel, periwinkle and orchard grass. Some oceanspray and tall Oregon-grape occur.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems*, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

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According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property**. The boundaries of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

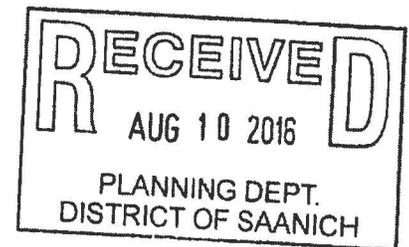
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Will and Katie Maxwell

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2801 Tudor Avenue – Property of Will and Katie Maxwell

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2801 Tudor Avenue, within the SEI polygon is mostly dominated by a dense cover of invasive shrubs including Himalayan blackberry, English ivy, Scotch broom, hawthorn, golden chain, Portuguese laurel and periwinkle along with orchard grass and other invasive herbs. A patch of Nootka rose occurs. The northeast portion of the property has invasive grasses as indicated above, including dense orchard grass in deeper soil areas.

This property does not support a Sensitive Ecosystem, following the provincial *Standard*

for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

The Saanich guidelines recommend for a biologist to: "Evaluate each ecological community for ecological sensitivity and at-risk status and determine which class and subclass of Sensitive Ecosystem it belongs to, if any."

I have consulted the two standards recommended by Saanich's 2013 Guidelines document:

- 1) Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, Ministry of Environment, Resources Information Standards Committee, December 5, 2006, Version 1.0
- 2) Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands 1993-1997. Volume 2: Conservation Manual

According to # 1: "Ecosystems at risk are those that can support ecological communities which are considered to be provincially at risk as designated by the B.C. Conservation Data Center. Sensitive Ecosystems are those that are at-risk or are ecologically fragile. The vegetation species composition and structure **must fall within the expected range of the defined plant association before it is considered an occurrence of that particular plant association.** The ecosystem occurrence itself must have sufficient ecological integrity to be sustained in the foreseeable future if it is to have practical conservation value."

According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries

of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

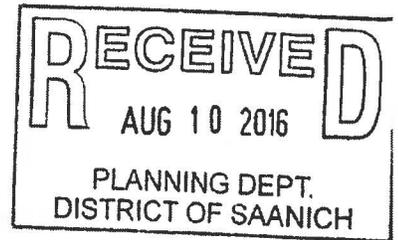
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Will and Katie Maxwell

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2811 Tudor Avenue – Property of Leslie Glazier

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2811 Tudor Avenue, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. Sweet vernal grass is prominent. There is a significant cover of Scotch broom in the shrub layer. Few wildflowers are present. Moss areas occur in the very shallow areas and have a significant cover of invasive grasses associated with them, as well as hairy cat's-ear. There is a dense cover of blackberry at the north end of the property within the SEI unit. At the south end there is an area of dense Scotch broom, English ivy and orchard grass. Some snowberry and tall Oregon-grape occur.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems*, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

The Saanich guidelines recommend for a biologist to: "Evaluate each ecological community for ecological sensitivity and at-risk status and determine which class and subclass of Sensitive Ecosystem it belongs to, if any."

I have consulted the two standards recommended by Saanich's 2013 Guidelines document:

- 1) Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, Ministry of Environment, Resources Information Standards Committee, December 5, 2006, Version 1.0
- 2) Sensitive Ecosystems Inventory: East Vancouver Island and Gulf Islands 1993-1997. Volume 2: Conservation Manual

According to # 1: "Ecosystems at risk are those that can support ecological communities which are considered to be provincially at risk as designated by the B.C. Conservation Data Center. Sensitive Ecosystems are those that are at-risk or are ecologically fragile. The vegetation species composition and structure **must fall within the expected range of the defined plant association before it is considered an occurrence of that particular plant association.** The ecosystem occurrence itself must have sufficient ecological integrity to be sustained in the foreseeable future if it is to have practical conservation value."

According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property**. The boundaries of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

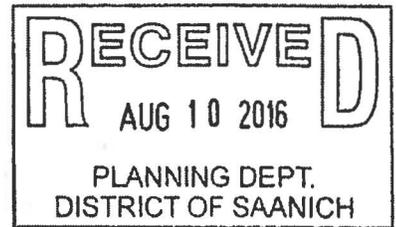
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Leslie Glazier

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2821 Tudor Avenue – Property of Jim and Gail Evans

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2821 Tudor Avenue, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. Sweet vernal grass is prominent. There is a significant cover of Scotch broom in the shrub layer, and patches of Himalayan blackberry. Few wildflowers are present. Moss areas occur in the very shallow areas and have a significant cover of invasive grasses associated with them. The oak grove just south of the house has a dense cover of orchard grass.

This property does not support a Sensitive Ecosystem, following the provincial *Standard*

for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

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According to # 1: "Ecosystems at risk are those that can support ecological communities which are considered to be provincially at risk as designated by the B.C. Conservation Data Center. Sensitive Ecosystems are those that are at-risk or are ecologically fragile. The vegetation species composition and structure **must fall within the expected range of the defined plant association before it is considered an occurrence of that particular plant association.** The ecosystem occurrence itself must have sufficient ecological integrity to be sustained in the foreseeable future if it is to have practical conservation value."

According to # 2, Sensitive ecosystem guidelines seek to conserve the seven sensitive ecosystems in a **relatively natural state.**

The subject property does not meet the definition of an Environmentally Significant Area (ESA) for the following reasons. The property is dominated by invasive species. There are few native species. There is no Sensitive Ecosystem ESA in a **relatively natural state** on this property. The property does not support an **ecological community that can be considered provincially at risk by the BC Conservation Data Center.** This occurrence does not have sufficient ecological integrity to be sustained in the foreseeable future, due to the predominance of alien invasive species.

Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries

of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

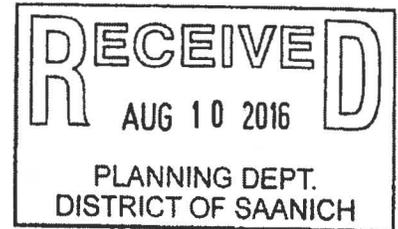
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Jim and Gail Evans

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2825 Tudor Avenue – Property of Kevin Cuddihy and Erica Kjekstad

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2825 Tudor Avenue, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. Broom and periwinkle are significant in some areas. Few wildflowers remain. Significant amounts of Scotch broom, blackberry and English ivy have been removed by the landowner.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping*

Ecosystems at Risk and Other Sensitive Ecosystems, BC MOE Resources Information Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

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Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries

of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

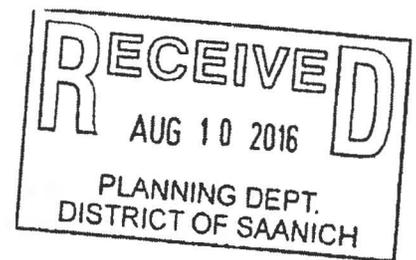
The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc. Kevin Cuddihy and Erica Kjekstad

To Adriane Pollard
Manager of Environmental Services
District of Saanich

July 4th, 2016



Re: Field Verification and Assessment of Terrestrial Herbaceous Sensitive Ecosystem ESA Mapping at 2831 Tudor Avenue – Property of Walter Jackson

Please accept this as a letter report assessing whether there is an occurrence of a Terrestrial Herbaceous (HT) Sensitive Ecosystem on this property.

I have visited this map unit and property in late May 2016 and early June 2016.

The overall Terrestrial Herbaceous map unit occurs between Tudor Avenue and Seaview Road. The map unit is fairly consistent in vegetative cover overall and has individual differences by property. Much of the map unit is gentle to moderately sloping and has shallow to very shallow soils. The map unit has a sparse cover of Garry oak. Most of the unit is dominated by invasive species and has very few remaining native species on the properties that this unit encompasses. There is no Sensitive Ecosystem remaining on this map unit. The dominant invasive species include a dense cover of annual brome grasses, orchard grass, Scotch broom, and dense patches of Himalayan blackberry, periwinkle and English ivy. Over time, landowners have removed Scotch broom, English ivy and blackberry, where possible. Other invasive species commonly found are sweet vernal grass, spurge laurel, cotoneaster, privet and hairy cat's-ear. Native species occur as scattered individuals or in small patches. They include camas, Hooker's onion, and blue wildrye in very small amounts. Some of the very shallow areas have a dense cover of native moss species that are still in good condition however, the majority of these areas have a dense invasive grass cover intermixed with the moss cover. The map unit does not link natural communities to any other natural area (i.e. no corridor), and is surrounded by residential properties in all directions. If this map unit were to be left alone with no invasive shrub removal it would quickly become dominated by a dense cover of Scotch broom, English ivy and Himalayan blackberry, and the invasive grass species would continue to increase and include other invasive species which are already present in smaller amounts. Restoration will be very difficult on this map unit and removal of invasive grasses and planting of native species including native grasses and wildflowers would consume significant resources including time and costs for landowners.

The property at 2831 Tudor Avenue, within the SEI polygon is dominated by invasive grasses as indicated above, including dense orchard grass in deeper soil areas. Scotch broom, cotoneaster and blackberry dominate the shrub layer. A significant area of St. John's wort occurs. No wildflowers were seen. Moss areas occur in the very shallow areas.

This property does not support a Sensitive Ecosystem, following the provincial *Standard for Mapping Ecosystems at Risk in British Columbia: An Approach to Mapping Ecosystems at Risk and Other Sensitive Ecosystems*, BC MOE Resources Information

Standards Committee (December 2006), nor in accordance with the Sensitive Ecosystem standard for Vancouver Island (see below). If the methods from these reports are followed, as recommended by the District of Saanich document: *Guidelines for Verifying and Defining Boundaries of Sensitive Ecosystem Inventory Polygons In the Environmental Development Permit Area (#29)*, it is clear that **there is no Terrestrial Herbaceous Sensitive Ecosystem on the property.**

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Following these standards and guidelines it is my professional opinion that **there is no Terrestrial Herbaceous Sensitive Ecosystem ESA on this property.** The boundaries of the current ESA mapping should be refined, as any development would be outside of the Sensitive Ecosystem Environmentally Significant Area (ESA).

The ESA and subsequent EDPA designation should be removed from this property for the Terrestrial Herbaceous SEI polygon.

Ted Lea, R.P.Bio.
Vegetation Ecologist

cc.

2860-25 Sea View
Tudor.

From: TONY GAGE [REDACTED]
To: <clerksec@saanich.ca>
Date: 2/28/2017 2:48 PM
Subject: Re application to remove eight properties from EDPA

POSTED	POSTED
COPY TO _____	
INFORMATION	<input type="checkbox"/>
REPLY TO WRITER	<input type="checkbox"/>
COPY RESPONSE TO LEGISLATIVE DIVISION	
REPORT	<input type="checkbox"/>
FOR _____	
ACKNOWLEDGED: _____	

I would like to register my view that the eight properties asking for removal from the EDPA be granted. I would also like to object to what I perceive as the substantial overreach of the Saanich staff.

Yours truly,

Tony Gage
[REDACTED] Tudor Avenue,
[REDACTED]

Sent from my iPad

RECEIVED
FEB 28 2017
 LEGISLATIVE DIVISION
 DISTRICT OF SAANICH

Clerksec - EDPA - Support for removal of properties from the EDPA on Ten Mile Point

From: Michael Newson [redacted]
To: <clerksec@saanich.ca>
Date: 2/28/2017 10:25 AM
Subject: EDPA - Support for removal of properties from the EDPA on Ten Mile Point

POST TO	POSTED
COPY TO	
INFORMATION	<input type="checkbox"/>
REPLY TO WRITER	<input type="checkbox"/>
COPY RESPONSE TO LEGISLATIVE DIVISION	
REPORT	<input type="checkbox"/>
FOR _____	
ACKNOWLEDGED: _____	

To Whom it may concern:

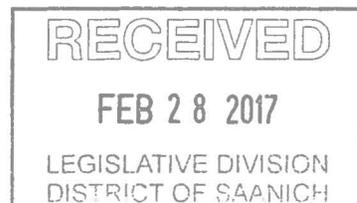
RE:

"Request for Removal from the EDPA (2785, 2801, 2811, 2821, 2825, 2831 Tudor Avenue; 2766 and 2810 Sea View Road)"

I am adding my name and property to the group of Ten Mile Point residents applying for removal from the EDPA.

Regardless, as an owner who is also impacted - I support their application.

Michael Newson
[redacted] Seaview Road
Victoria, [redacted]



Clerksec - Fw: COUNCIL MEETING DATE CONFIRMATION - Request for Removal from the EDPA (2785, 2801, 2811, 2821, 2825, 2831 Tudor Avenue; 2766 and 2810 Sea View Road)

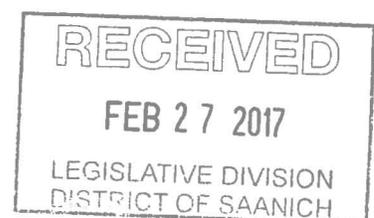
POST TO	POSTED
COPY TO	
INFORMATION	<input type="checkbox"/>
REPLY TO WRITER	<input type="checkbox"/>
COPY RESPONSE TO LEGISLATIVE DIVISION	
REPORT	<input type="checkbox"/>
FOR	
ACKNOWLEDGED:	
Colin	

From: Kevin Cuddihy [REDACTED]
To: Mayor <mayor@saanich.ca>, Fred Haynes <fred.haynes@saanich.ca>, Colin Pl...
Date: 2/24/2017 5:34 PM
Subject: Fw: COUNCIL MEETING DATE CONFIRMATION - Request for Removal from the EDPA (2785, 2801, 2811, 2821, 2825, 2831 Tudor Avenue; 2766 and 2810 Sea View Road)
CC: Susan Brice <susan.brice@saanich.ca>, Dean Murdock <dean.murdock@saanich...
Attachments: Sea View Road and Tudor Avenue.pdf; blob.jpg

Hello,

For any of you who would like to visit my property regarding my EDPA removal application, I would like to re-extend the invitation from last year now that we have a confirmed date of March 6th to go before Council. My schedule is quite flexible, though some notice would be helpful so I can try and have my biologist on site as well.

I would like to highlight one factual inconsistency in the Staff report which states, "The applicant did not give authorization for Saanich staff to visit any of the properties." In fact, every form said to contact the owner to discuss. In the seven months Staff has had the application, I am not aware of any contact.



Reason for removal request:

Based on the biologist's report, there is no ESA on the property.

Note - if staff wish to access the property, they can contact the owner to discuss.

Do you authorize staff to access the property:

YES NO