



# Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

## Introduction

The vision for Resilient Saanich is from the Sustainable Saanich Official Community Plan: “Saanich is a model steward working diligently to improve and balance the natural and built environments. Saanich restores and protects air, land, and water quality, the biodiversity of existing natural areas and eco-systems, the network of natural areas and open spaces, and urban forests.”

The Resilient Saanich Environmental Policy Framework includes biodiversity, climate change, and stewardship as the building blocks of environmental conservation and sustainability in Saanich. Existing, enhanced, and new bylaws, policies, procedures, and programs will be nested under Resilient Saanich.

As part of Milestone One, taking stock of the existing policy framework and identifying gaps is an important first step in the process. The Terms of Reference action item deliverable is to: “Draft a Resilient Saanich framework skeleton of existing policies, etc. Conduct a gap analysis. Identify options for filling gaps using the Green Bylaws Toolkit and other references”.

This document is a second draft for use at the Resilient Saanich Technical Committee (RSTC) table. This document will continually be revised through the process.

Without knowing the Resilient Saanich goals and objectives, the gap analysis can only identify the opportunities as opposed to what should be done. Figure 1 shows how this approach fits into the Milestone approach (see the Resilient Saanich Terms of Reference) to developing an overall Environmental Policy Framework. Once the project goals and objectives are established, this document will be revised as a third draft. The draft policy gap analysis only covers the first three steps.

Appendix A contains examples of goals and objectives set by other local governments as part of an environmental policy framework. Appendix B contains a visualization of an Environmental Policy Framework

Figure 1: Flow diagram of the steps to complete the Environmental Policy Framework





What natural assets are in Saanich and what risks do they face?

Nature has intrinsic value that we have a role in stewarding. Natural assets are local resources, species, and ecosystems that provide benefits ranging from clean water, clean air, food production, cultural identity, to mental and physical health. Natural assets include parks, forests, streams, the ocean, wetlands, mature trees, and much more. Saanich’s Environmentally Significant Areas (ESA) Atlas displays many of these features, but there are many more that are not identified in formal inventories including indigenous traditional ecological knowledge and smaller ecosystems. Table 1 looks at the fundamental elements of Saanich’s natural assets and the threats they face in providing benefits. Additional threats may be identified through the course of the Resilient Saanich initiative.

TABLE 1: Benefits of Natural Assets and the Threats They Face

Natural Assets	Human Benefits	Threats to Assets
<b>Soil</b>	<p>Soil provides us with a medium to grow food. Soil allows forests to grow and provide shade and improve air quality. Soil filters water and cleans it before reaching aquifers, streams, and our taps.</p> <p>Soil can also act as both a source of carbon emissions, releasing greenhouse gases (GHG) into the atmosphere, or as a sink, sequestering carbon and keeping it from contributing to global climate change.</p> <p>Various types and depths of soil also play a fundamental role in determining ecosystems and allowing other natural assets to exist.</p>	Covering of parent materials with imported materials
		Removal of parent material
		Contamination from pollutants
		Loss from erosion
		Loss of soil biota from heat and drought
		Change in soil chemistry from invasive species
		Reduction of organics due to clearing for fire safety or tidying up
<b>Air</b>	<p>The quality of air is paramount in maintaining life on earth. Clean air keeps us healthy. Extreme temperatures coupled with poor air quality can be hard on people, wildlife and habitat.</p>	Increase in soil decomposition rates and GHG emissions (previously sequestered by the soil) from climate change (more intensive agriculture, logging, deforestation, development of natural lands, etc.)
		Poor local air quality from increased forest fires locally, regionally and provincially– due to climate changes including hotter, drier summers and increased wind and storm events causing more deadwood and increased fire threat
		Increasing temperatures
		Heat islands and microclimates
<b>Watersheds and Fresh Water Ecosystems</b>	<p>Freshwater ecosystems—from streams to wetlands—play a major role in providing us with water for drinking and irrigation. We are fortunate to have fish populations in Saanich despite the seasonal variations in precipitation and urbanization.</p> <p>Wetlands and riparian areas (vegetation next to streams and wetlands) are considered the most biodiverse ecosystems. They also slow down and filter water, providing clean water in our watersheds.</p>	Reduction in air cleaning ecosystem services from trees/vegetation due to increased development, logging and deforestation
		Not meeting Water Quality for Aquatic Life parameters
		Reduced environmental flows to support aquatic life
		Damage from flash flooding, increasing erosion, sediment loads, and contaminants in water courses due to volume of storm water runoff
		Vegetation stress from increasing average temperatures and drier summers
		Reduction in fish populations from more frequent and intense heat waves causing warmer temperatures in streams and decreasing water quality
		Contamination of groundwater
		Reduced groundwater recharge
		Loss of in-stream function
		Loss of riparian areas
Loss of wetlands		

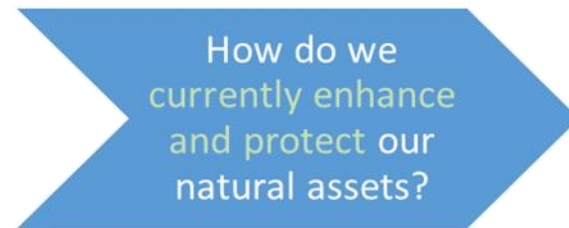


## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

Natural Assets	Human Benefits	Threats to Assets
		Decline in quality due to increase in conditions favouring invasive species Increase in impervious surfaces from development Increase in use of water resources for irrigation Loss of floodplain capacity Ecological regime shifts from climate change
<b>Terrestrial Ecosystems</b>	<p>Saanich is historically known for its 'heritage landscape'—the Garry Oak Ecosystem—as a place tended by the First Nations and admired by early settlers. Currently, it remains important to First Nations and all Saanich residents.</p> <p>Coniferous ecosystems dominated by Western Cedar, Douglas-fir and Grand Fir also cover a significant portion of Saanich.</p> <p>All ecosystems in Saanich are considered provincially rare due to their small range and the impacts of development.</p>	Loss or extinction of rare ecosystems and species from development Stress due to increased temperatures and drought Slow adaptation to climate change Decline in quality due to invasive species Increased fire risk from climate change Fragmentation
<b>Marine Environment</b>	<p>The nearshore and backshore marine environments are important places to recreate and contemplate. Food and nutrients are generated for the ocean which, in turn, provides us with the same. First Nations focused much of their time on the marine environment for food, trade, transportation, and villages.</p>	Sedimentation and salinization from rising sea levels Backshore habitat loss from rising sea levels Impacts of increasing temperature due to climate change Loss of forage fish habitat from shoreline hardening Decline in biodiversity Increase in contamination from sewage inflow and infiltration Ocean Acidification
<b>Urban Forest</b>	<p>The urban forest is part of many ecosystem types in Saanich. The urban forest also includes non-native trees. Canopy cover provides us with shading and cooling, protection from storms, and contributes to storm water management. In urban and suburban areas, the urban forest provides welcome respite from concrete and the built environment.</p>	Loss from development Stress due to increased temperatures and drought due to climate change Slow adaptation to climate change Decline in quality due to invasive species, pests, and disease Increased fire risk due to climate change Reduction of habitat due to planting of non-native trees Reduction in canopy due to perceived fire risk of trees Increase in storm damage
<b>Habitat</b>	<p>All of the natural assets listed above provide habitat—for ourselves and the rest of the plant and animals found in Saanich. The chorus of frogs, insects, or birds are valued by many residents. Seeing a salmon, a nesting bird, or a blooming plant are valued. Saanich is fortunate to have a great variety of species, some of which are rare in BC and/or Canada and beyond.</p> <p>Humans also need habitat, whether it is natural or manufactured.</p>	Slow adaptation to climate change Decline in quality due to invasive species Contamination from pesticides Clearing to reduce fire risk Impact from reduction in pollinators Reduced habitat for cavity nesters to reduce fire risk from dead trees Loss from clearing due to lack of knowledge Reduced habitat by planting of non-native and invasive species Loss or extinction of rare species from development, logging, and agriculture Loss of Indigenous valued habitat Loss of human access or connection with the land



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis



Council can adopt bylaws and policies. A bylaw establishes regulations that must be complied with, whereas a policy sets direction to achieve an objective, or guide decision-making. Policies are motions that are adopted by Council and may be in the form of a statement, guidance, principles, a strategy, a framework, or a plan. Staff may not take action that is contrary to policies, however Council may choose to vary or avoid policies in specific instances. Policies are a typical tool for directing staff on how to administer bylaws, manage assets, evaluate proposals, and set expectations. Staff may develop procedures, programs, and partnerships in order to follow Council's direction and demonstrate stewardship.

The Sustainable Saanich Official Community Plan (OCP) is a bylaw, however it contains both policies and regulations (Development Permit Areas). Since it is a bylaw, staff and Council may not take action (including adoption of a bylaw) that is contrary to the OCP. Consequently, the OCP is often amended to allow development applications to proceed.

In order to implement bylaws, policies, and plans, staff develop procedures, programs, and partnerships to be consistent, clear, and community-minded. This is how visions are translated into action on the ground.

TABLE 2: Overview of Current Saanich bylaws, policies, strategies, and plans that contain provisions for environmental protection

(Note that many Council policies are decades old and may not have been reviewed or considered recently and may be redundant, out dated, etc.)

Bylaws	Council Policies (and date last amended)	Strategies, Plans, etc. endorsed by Council	Procedures	Current Programs & Partnerships
Official Community Plan (Appendix A to Bylaw No. 8940, 2008): <ul style="list-style-type: none"> <li>Streamside Development Permit Area (Schedule N)</li> <li>Floodplain Development Permit Area (Schedule N)</li> <li>Portage Road Development Permit Area (Schedule N)</li> <li>Saanich General and Other Form &amp; Character Development Permit Areas (Schedule N)</li> </ul>	Official Community Plan, 2008, No. 8940: <ul style="list-style-type: none"> <li>Local Area Plan Policies</li> <li>Action Plan Policies</li> <li>Environmental Integrity policies (OCP, Section 4.0)</li> <li>Urban Containment, Villages and Centres (OCP, Map 4)</li> <li>Sewer Service Area (OCP, Map 18)</li> </ul>	Active Transportation Plan (2018) Bowker Creek Management Plan (2003) Bowker Creek Blueprint (2011) Climate Plan (2020) Colquitz River: An Appraisal and Plan (Saanich, 1967) Durrell Creek Watershed Management Plan (1999)	Best Management Practices Compendium (ongoing) Environmental Protocol (2003) Greener Garbage Program Park Acquisition Guide (Saanich, 2019) Confidential Pesticide Bylaw Enforcement Administrative Policy (2010)	Bowker Creek Initiative Bring It Home 4 Climate program Building Benchmark BC CleanBC Better Homes BC energy retrofit rebate top-ups Capital Region Invasive Species Partnership (CRISP)
Animals Bylaw, 2004, No. 8556	Asset Management (2019) Bicycle Parking Guidelines (1996) Boulevard Tree Policy (1994)	E-Mobility Strategy (in progress) Integrated Pest Management Procedure Integrated Stormwater Management Plans (in progress)	Public Works Operating Procedure: Pollution Control (Spills) Storm drain/open ditch policy (1998) Tree and Vegetation Retention, Relocation and Replacement Guidelines (Saanich, 1993)	Community Events & Workshops Community Gardens Community Stewardship Groups, such as Friends of Parks and Watershed Groups (providing support)
Boulevard Bylaw, 2018, No. 9487	Bylaw Enforcement Policy (2018)	Invasive Species Management Strategy (2013)	Watercourse Maintenance BMPs	Cool It Climate Leadership Training



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

Bylaws	Council Policies (and date last amended)	Strategies, Plans, etc. endorsed by Council	Procedures	Current Programs & Partnerships
Building Bylaw, 2019, No. 9529 (includes BC Energy Step Code) Deposit of Fill Bylaw, 2012, No. 9204 Electric Vehicle Off-Street Parking Bylaw, 2019, No. 9529 Fees Bylaw, 2010, No. 9062 Noxious Weeds Bylaw, 2000, No. 8080 Oil Burning Equipment & Flammable Liquid and Combustible Liquid Fuel Tank Bylaw, 2014, No. 9265 Parks Management and Control Bylaw, 1997, No. 7753 Pesticide Bylaw, 2010, No. 9054 Soil Removal Bylaw, 1986, No. 5576 Streets and Traffic Bylaw, 2002, No. 6786 Subdivision Bylaw, 1995, No. 7452 Tree Protection Bylaw, 2014, No. 9272 Watercourse and Drainage Bylaw, 1996, No. 7501 Zoning Bylaw, 2003, No. 8200, including: EV Infrastructure Requirements for New Development (p. 7-3 to 7-6)	Climate Emergency Declaration (2019) Committee on Urban Growth (1981) Community Gardens (2003) Declaration of the Right to a Healthy Environment (2015) Energy Conservation Policy (1985) Environmental and Social Review Policy (2002) Environmental Impact Assessment on Municipal Properties (1996) Geothermal Heat Exchangers in Saanich Freshwater Ecosystems Policy (2008) Geothermal Heat Exchangers in Saanich Freshwater Ecosystems Policy (2008) Green Building Policy (2005) Green Building Policy: Private Sector (2007) Integrated Pest Management Policy (2003) Landscaping and Screening Guidelines- Development Permit Areas (1987) Local Food Procurement Policy (2012) Naturescape Principles (2001) Panhandle Lots (1978) Park Development or Improvements Policy (1990) Parks—Installation of Major Facilities or Services (1983)	Parks, Recreation & Culture Master Plan (2013) Recommended Environmental Policy Guidelines and Suggested Actions for the Municipality of Saanich (1991, Healthy Saanich 2000 Environment Subcommittee) Saanich Corporate Strategic Energy Management Plan Saanich Greenbelt Proposal (1972) Saanich Green/Blue Spaces: A Framework for Action (2000) Strategic Plan 2019-2023 (2019) Urban Forest Strategy (2010)		CRD Climate Inter-Municipal Working Group District 2030 ESA Inventory & Mapping Gorge-Colquitz Special Management Area (Steering Committee and Collaboration) Gorge Waterway Initiative Haliburton Community Organic Farm Horticulture Centre of the Pacific Interpretative signs Invasive Species Control & Disposal (public and private lands) Knotweed Treatment Program (public and private lands) Love Food Hate Waste campaign Native Plant Salvage Program Natural Area Restoration Program Natural Intelligence Program Nature preschools and schools Naturescape Program One Planet Saanich Park Ambassador Program Partnership Tree Planting Program Pollinator Canada Initiative



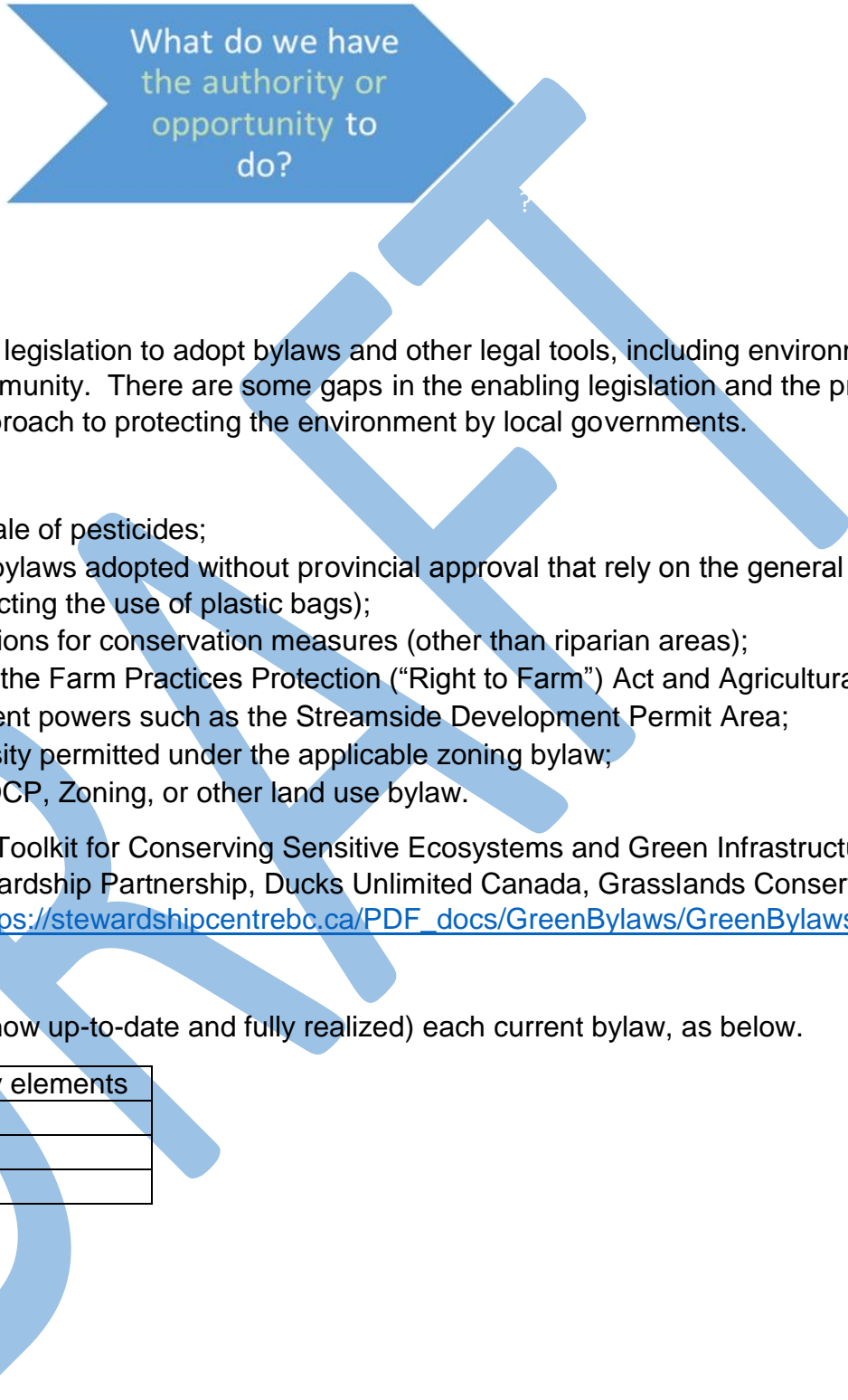
## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

Bylaws	Council Policies (and date last amended)	Strategies, Plans, etc. endorsed by Council	Procedures	Current Programs & Partnerships
	Purchasing Products and Materials Containing a Recycled Content (1989) Restrictive Covenants (1994)  Street Lights (1978) Subdivision—Provision of Public Access to Bodies of Water (1979)  Subdivision Applications (Panhandle Lots) - Reduced Frontage (1999)  Subdivision Applications (Panhandle Lots) - Reduced Frontage (1999)  Subdivisions—Parkland Provision (1986)  Surface Stormwater Management-Development Guidelines (2001) Toxic Real Estate Development (1990) Use of Chlorofluorocarbons and Halons (1989)			Pulling Together Program (invasive species removals in parks) Salmon in the City (Colquitz River)  Statement of Cooperation and Commitment for the Recovery of Garry Oak Ecosystems and Associated Species at Risk (2008) Stream/Riparian Restoration  Swan Lake Christmas Hill Nature Sanctuary

**Some examples of Bylaws with the potential to impact the environment but without environmental provisions:**

Blasting Bylaw, 1992, No. 6821

Driveway Access Bylaw, 2011, No. 9136



**Part A: Legal Tools**

Local Governments are enabled, and sometimes mandated, through provincial legislation to adopt bylaws and other legal tools, including environmental protection tools. Some bylaws and policies are created through the general powers of Council to serve and safeguard the community. There are some gaps in the enabling legislation and the provisions to protect the environment are scattered through many provisions. This contributes to a lack of understanding and cohesive approach to protecting the environment by local governments.

Examples of areas outside of local government jurisdiction are the ability to:

- Adopt bylaws where no enabling legislation exists, such as regulating the sale of pesticides;
- Adopt bylaws that exceed the statutory authority of a municipality, such as bylaws adopted without provincial approval that rely on the general authority in relation to the environment which is a “sphere of concurrent jurisdiction” under the Community Charter (for example, restricting the use of plastic bags);
- Adopt bylaws in conflict with legislated limitations, such as giving tax reductions for conservation measures (other than riparian areas);
- Adopt bylaws that are in conflict with senior government legislation such as the Farm Practices Protection (“Right to Farm”) Act and Agricultural Land Commission Act;
- Apply fines, stop-work-orders, and tickets to bylaws without such enforcement powers such as the Streamside Development Permit Area;
- Enforce a Tree Bylaw to the extent that prevents a development to the density permitted under the applicable zoning bylaw;
- Compensate a landowner for damage or loss of property value due to the OCP, Zoning, or other land use bylaw.

The following summary of enabling legislation is taken from the Green Bylaws Toolkit for Conserving Sensitive Ecosystems and Green Infrastructure (Prepared by Environmental Law Clinic, University of Victoria Faculty of Law, and Deborah Curran & Company for the Wetland Stewardship Partnership, Ducks Unlimited Canada, Grasslands Conservation Council of British Columbia, Environmental Canada, and the Province of British Columbia, 2016) which can be found at [https://stewardshipcentrebc.ca/PDF\\_docs/GreenBylaws/GreenBylawsToolkit\\_2016.pdf](https://stewardshipcentrebc.ca/PDF_docs/GreenBylaws/GreenBylawsToolkit_2016.pdf). Additional legal tools are listed with an analysis and how Saanich is utilizing each tool.

The final column uses colour coding to give an indication on the status of (i.e. how up-to-date and fully realized) each current bylaw, as below.

	The current bylaw is absent, significantly out-of-date, or missing key elements
	The current bylaw has room for improvement or at least a review
	The current bylaw is complete and up-to-date
	Provided for information.



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

TABLE 3 Related Saanich Bylaws Overview & Status

**(NOTE: The following table is for general information purposes and the content has been paraphrased. Refer to the legislation and bylaws directly for full information.)**

	Enabling Legislation Sections	Corresponding Saanich Bylaw	Is there a gap or room for improvement?
COMMUNITY CHARTER	Regulate municipal services and <b>public places</b> s 8(3) (a) (b)	Parks Management and Control Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Protection of the <b>natural environment</b> (requires provincial approval if only using this clause) S 8(3) (j)	Plastic Bag Bylaw (not yet adopted)	This provides potential authority to address gaps identified through the RS process but requires provincial approval.
	Regulate, prohibit and impose requirements in relation to <b>trees</b> ss. 8(3)(c), 15, 50)	Tree Protection Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Regulate, prohibit and impose requirements in relation to <b>explosives</b> ss. 8(3)(d)	Blasting Bylaw	
	Regulate, prohibit and impose requirements in relation to polluting or obstructing, or impeding the flow of, a stream, creek, waterway, <b>watercourse</b> , waterworks, ditch, drain or sewer, whether or not it is located on private property ss. 8(3)(j), 9(3)(a) & 15; and <i>Spheres of Concurrent Jurisdiction-Environment and Wildlife Regulation s. 2(1)(a)</i>	Watercourse Bylaw	
	Regulate, prohibit and impose requirements in relation to the sale of <b>wild flowers</b> ss. 8(3)(j), 8(3)(k), 9(3)(a) & 15; and <i>Spheres of Concurrent Jurisdiction-Environment and Wildlife Regulation s. 2(1)(a) (b)(iii)</i>	--	The sale of noxious weeds and invasive species is not part of the Noxious Weeds Bylaw.
	Regulate, prohibit and impose requirements in relation to the application of <b>pesticides</b> for the purpose of maintaining outdoor trees, shrubs, flowers, other ornamental plants and turf on residential areas or on land vested in the municipality ss. 8(3)(j), 8(3)(k), 9(3)(a) & 15; and <i>Spheres of Concurrent Jurisdiction-Environment and Wildlife Regulation s. 2(1)(b)(ii)</i>	Pesticide Bylaw (2010, amended in 2020)	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Regulate, prohibit and impose requirements in relation to the control and eradication of alien <b>invasive species</b> ss. 8(3)(j), 8(3)(k), 9(3)(a) & 15; and <i>Spheres of Concurrent Jurisdiction-Environment and Wildlife Regulation s. 2(1)(a) (b)(iii)</i>	Noxious Weeds Bylaw	
	Require the conservation of energy or water; and the reduction of <b>greenhouse gas emissions</b> In relation with building permits ss. 8(3)(l) & 53	Building Bylaw (BC Energy Step Code)	
	Prohibit <b>soil removal</b> without a permit ss. 8(3)(m), 9(1)(e) & 15	Soil Removal Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.
Prohibit the <b>deposit of soil</b> or other material, making reference to quality of the soil or material or to contamination, without a permit ss. 8(3)(m), 9(1)(e) & 15	Deposit of Fill Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.	





Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

	Enabling Legislation Sections	Corresponding Saanich Bylaw	Is there a gap or room for improvement?
COMMUNITY CHARTER	Require persons to do things with their property, to do things at their expense and to provide <b>security</b> for fulfilling a requirement ss. 8(8)(c), 17 & 19	Streamside Development Permit Area Subdivision Bylaw Tree Protection Bylaw Deposit of Fill Bylaw Soil Removal Bylaw Boulevard Bylaw	Various bylaws could be reviewed for environmental enhancement and protection objectives.
	Expropriate a <b>water license or a streambed</b> ss. 31(2), 34(1)	Watercourse Bylaw Streamside Development Permit Area	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Require manufacturers and processors to dispose of the <b>waste</b> from their plants in the manner directed by bylaw s 59	--	This subject matter is comprehensively covered by the Environmental Management Act and Regulations. It is unlikely for a local government to find this clause useful.
	Regulate: <ul style="list-style-type: none"> <li>the <b>emission</b> of smoke, dust, gas, sparks, ash, soot, cinders, fumes or other effluvia that is liable to foul or contaminate the atmosphere</li> <li>drains, cesspools, <b>septic tanks</b> and outhouses</li> <li><b>trees, weeds</b> or other growths that council considers should be removed, cut down or trimmed</li> </ul> 64 (c) (h) (i) and (3) (h) [spheres of authority — nuisances disturbances and other objectionable situations]	Nuisance Bylaw (No. 7622), 1996 Fire Prevention Bylaw (No. 8807), 2006	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Regulate design and implementation of <b>drainage</b> ; maintain flows s. 69	Subdivision Bylaw (Schedule H—Engineering Requirements)	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Designate <b>watercourses</b> as part of the municipal drainage infrastructure s. 69	Watercourse Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Riparian Tax Exemption— Compensates land owners for covenanting their <b>riparian areas</b> s. 225	Not required. If a land owner applies for the exemption, it will be considered by Council	Saanich could increase awareness of this opportunity, however upfront costs may result in a low return for property owners. Additionally, each property requires an agreement and a specific bylaw.
	<b>Revitalization</b> tax exemption S 226(1)	--	Could encourage centrally located, higher density, renewable energy buildings. Note that a comprehensive bylaw and program would be required to utilize this seldom-used clause.



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

LOCAL GOVERNMENT ACT—Official Community Plan provisions	Must include statements and map designations for the area covered by the plan respecting restrictions on the use of land that is <b>environmentally sensitive</b> to development s 473 (1) (d)	Streamside Development Permit Area	The Streamside Development Permit Area Atlas requires continual updating.
	Must include targets for the reduction of <b>greenhouse gas emissions</b> in the area covered by the plan, and policies and actions of the local government proposed with respect to achieving those targets s 473 (3)		OCP has not yet been updated to reflect the new GHG/RE energy targets adopted by Council in the Climate Plan
	May include policies of the local government relating to the preservation, protection, restoration and enhancement of the natural environment, its ecosystems and <b>biological diversity</b> s 474	Sustainable Saanich Official Community Plan (2008)	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Specify circumstances or designate areas where development approval <b>information</b> may be required, such as impacts to natural areas in the case of a rezoning or development permit application ss. 484-487	Streamside Development Permit Area	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Designate a development permit area for the protection of the natural environment, its ecosystems and <b>biological diversity</b> establishment of objectives in the case of subdivision, construction, or alteration of land. A development permit may: specify areas of land that must remain free of development; require specified natural features or areas to be preserved, protected, restored or enhanced; require natural water courses to be dedicated; require protection measures, including that vegetation or trees be planted. ss. 488-491	Development Permit Areas	
	Designate a development permit area for the establishment of objectives to promote <b>energy conservation</b> ; establish objectives to promote water conservation; establish objectives to promote the reduction of greenhouse gas emission in the case of subdivision and construction. ss. 488-491		
	Adopt a Zoning Bylaw to regulate <b>land use</b> ; density, siting, and dimensions of buildings and structures; and minimize lot sizes. s. 479	Zoning Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.



Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

LOCAL GOVERNMENT ACT—Zoning provisions	A zoning bylaw may establish different <b>density rules</b> for a zone relating to the conservation or provision of amenities s. 482	Zoning Bylaw, for example Garden Suites	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Accept a <b>Regional Growth Strategy</b> and prepare a context statement Part 13	Official Community Plan including the Urban Containment Boundary	
	Issue a development <b>variance</b> permit that varies provisions in the Zoning Bylaw, Subdivision Bylaw, and other land use regulations (for example, varying a setback to preserve an environmental feature) s 498		Discretionary approval by Council may create an opportunity to secure additional environmental protections via covenant
	Regulate or prohibit the cutting down of <b>trees</b> in areas designated areas subject to flooding, erosion, or landslip. s 500	Tree Protection Bylaw (Steep Slopes)	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Require a <b>security</b> as a condition in a permit respecting landscaping or damage to the natural environment s 502	Streamside Development Permit Area Subdivision Bylaw Tree Protection Bylaw Deposit of Fill Bylaw Soil Removal Bylaw Boulevard Bylaw	Various bylaws could be reviewed for environmental enhancement and protection objectives.
	Require that, within a subdivision, a <b>drainage</b> collection system be provided, located and constructed in accordance with the standards established in the bylaw. s. 506	Subdivision Servicing Bylaw Schedule H—Engineering Specifications	The bylaw could be reviewed for environmental enhancement and protection objectives.
	An owner of land being subdivided must, at the owner's option: (a) provide, without compensation, <b>park land</b> of an amount and in a location acceptable to the local government, or (b) pay to the municipality or regional district an amount that equals the market value of the land that may be required for park land purposes under this section as determined under subsection (6) of this section. s. 510	Subdivision Bylaw Not required.	
	Require that an owner of land who carries out construction of a paved area or roof area manage and provide for the ongoing disposal of surface runoff and <b>storm water</b> in accordance with the requirements of the bylaw and may differ by zone. s 523	Subdivision Bylaw—Schedule H Building Bylaw	The bylaw could be reviewed for environmental enhancement and protection objectives.
	Establish the maximum percentage of the area of land that can be covered by <b>impermeable material</b> by bylaw and may differ by zone. s 523	n/a	
	Designate <b>floodplains</b> , create setbacks from watercourses in a floodplain, and make different provisions s 524	Floodplain Development Permit Area Deposit of Fill Bylaw	



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

LGA	Require, set standards for and regulate the provision of screening or landscaping for preserving, protecting, <b>restoring and enhancing</b> the natural environment and may differ by zone <i>s. 527 (and s 15 of the Community Charter)</i>	--	
	Impose development cost charges on approval of a subdivision, or a building permit for drainage, providing and improving <b>parkland</b> to service, directly or indirectly, the development for which the charge is being imposed. <i>ss. 559-565</i>	Development Cost Charges Bylaw (2020)	
LAND TITLE ACT	In considering an application for subdivision approval in respect of land, the approving officer may refuse to approve the subdivision plan if the approving officer considers the plan is against the <b>public interest</b> ; or after due consideration of all available <b>environmental impact</b> and planning studies, the anticipated development of the subdivision would adversely affect the natural environment to an unacceptable level <i>ss 83, 86</i>	Not Required. The Approving Officer may consider municipal policies as part of the approval process	
	A covenant in favour of a municipality may be registered against the title to the land subject to the <b>covenant</b> and is enforceable against the covenantor and the successors in title of the covenantor  A covenant may be of a negative or positive nature and may include that land (and any related natural, cultural, scientific, environmental, wildlife or plant life value) be protected, preserved, conserved, maintained, enhanced, restored or kept in its natural or existing state in accordance with the covenant <i>s. 219</i>	Signing Authority Bylaw	
OTHERS	<b>Riparian Areas Protection Act</b>		
	Riparian Area Protection Regulation  A local government must have in force zoning or land use bylaws that prohibits <b>riparian development</b> from proceeding unless compliant	Streamside Development Permit Area	The SDPA Guidelines need to be updated to new provincial standards
	<b>Weed Control Act</b>		
	Council of a municipality may establish one or more <b>weed control committees</b>	--	This is an alternative to a Noxious Weed or Invasive Species Bylaw and creates a Weed Control Committee.
	<b>Liquid Waste Management Core Area and Western Communities Service Establishment Bylaw No. 1, 1995 ("Bylaw No. 2312") and Supplementary Letters Patent (1978)</b>		
Core Liquid Waste Management Plan (CRD)	Saanich has municipal obligations under this bylaw.		

Part B: Stewardship

As well as the defined legal tools outlined in the above table, the other side of the same coin is stewardship of natural assets across the landscape and in the built environment.

According to the Stewardship Centre of BC: “Stewardship is about taking responsibility to promote, monitor, conserve and restore ecosystems for current and future generations of all species”. Stewardship can take many forms and all of these approaches can be taken by individuals, groups, organizations, and/or governments.

The pyramid represents both:

- the latitude that local governments have: legislative limitations as to which incentives and resources can be applied; and
- where the emphasis should be according to Community Based Social Marketing, which is a made-in-Canada approach to effecting change.

Table 4 summarizes current stewardship approaches in Saanich. This table will continue to be filled in as we learn more, especially about non-governmental approaches. Some approaches are listed twice (governmental and non-governmental) due to the special partnership approach.

As with bylaws, policies, plans, and procedures described above, gaps and improvements in stewardship approaches will be analyzed after the Resilient Saanich goals and objectives are established.

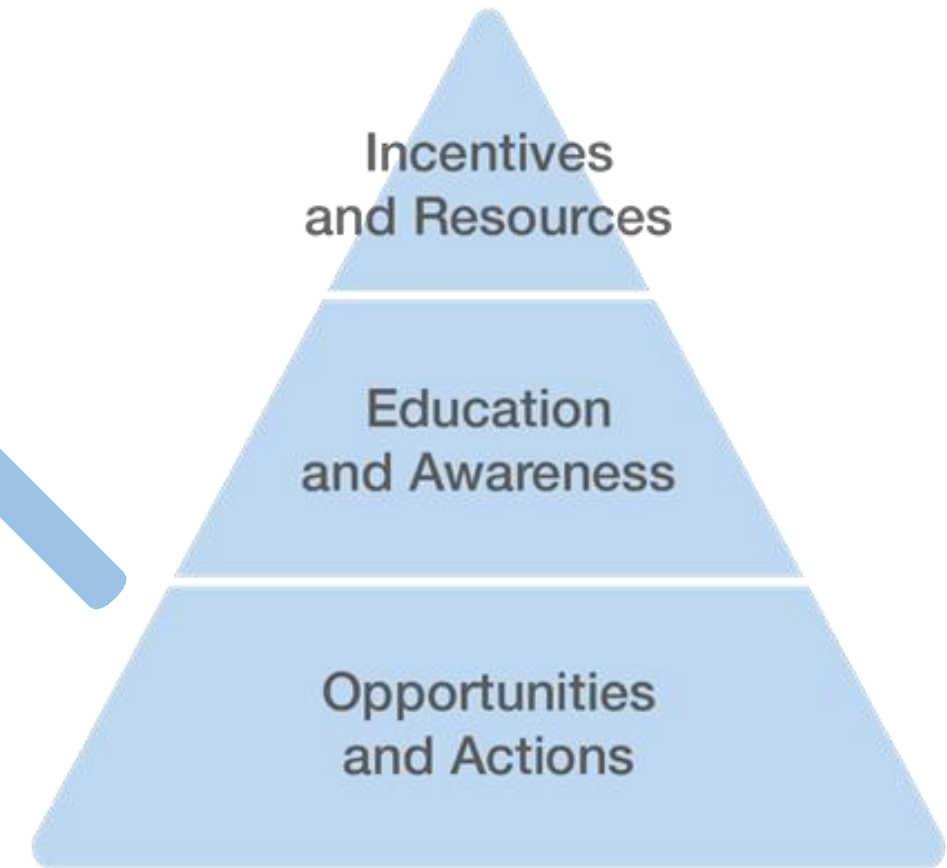


TABLE 4: Stewardship Approaches

Stewardship Approaches	Current District of Saanich Approaches	Non-Governmental Approaches
Acquisition	Purchase of parkland and major floodplains	Purchase of land through conservation organizations
Advocating and lobbying	Request for senior governments to take action or enable municipalities	Letters, campaigns, social media
Communicating methods and practical techniques	Invasive Species Alert Sheets Pesticide Alternative Fact Sheets Tree planting information, events Pulling Together program and natural area restoration projects Public Workshops Capital Region Invasive Species Partnership	Mentoring Community Events CR-FAIR
Educating, inspiring, and creating awareness	Naturescape Program Natural Intelligence Program Our Backyard Park Ambassadors Working with schools Working with many non-profit groups on restoration/education	School initiatives NGO initiatives Swan Lake Christmas Hill Nature Sanctuary Haliburton Farm Horticulture Centre of the Pacific



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

Stewardship Approaches	Current District of Saanich Approaches	Non-Governmental Approaches
Forming partnerships	Gorge Waterway Initiative Bowker Creek Initiative Garry Oak Ecosystems Recovery Team Many park partnerships	Colquitz Coalition Friends of Parks groups
Implementing plans and strategies	Invasive Species Management Strategy Urban Forest Strategy Climate Plan Bowker Creek Blueprint	
Legally protecting land for conservation	Natural Park designation Streamside Development Permit Area	Natural State or Conservation Covenants
Policies, protocols, operations	Environmental Protocol Spill Response	
Providing incentives for restoration and conservation	Riparian Tax Incentive Knotweed Treatment Program Significant Tree Program	
Providing resources (land, money, assistance, etc.)	Invasive species disposal Significant Tree Program Partnership Tree Program Community Garden Program Swan Lake Christmas Hill Nature Sanctuary Haliburton Farm Horticulture Centre of the Pacific	Fundraising
Restoration, enhancement, and maintenance of natural areas	Stream/Riparian Restoration Pulling Together Natural Areas Restoration Native Plant Salvage Program Removal of derelict boats	Stream/Riparian restoration Volunteerism NGOs such as Peninsula Streams Removal of derelict boats
Recognition	ENAC Annual Environmental Awards Saanich Volunteer Recognition events Our Backyard Volunteer Profiles	
Sharing research, inventory, and mapping	Saanich ESA Atlas Hosting annual Garry Oak conference	Victoria Natural History Society Habitat Acquisition Trust UVic, Royal Roads

Summary and Next Steps

Using a similar colour-coding as previous tables, Table 5 is an overview of the gap analysis for each natural asset. From this, the difference between approaches on private land versus public land can be seen; as well as the lack of attention to soil, the marine environment, and terrestrial ecosystems and habitat.

	Significantly out-of-date or missing key elements.
	Room for improvement or at least a review
	Complete and up-to-date.
	Unknown or lack of data

TABLE 5: Gap Analysis Overview of Enhancement and Protection of Natural Assets

Natural Assets	Bylaws & Policies	Strategies, Plans, Procedures	Municipal Initiatives & Stewardship	Community Initiatives & Stewardship	Comment
Soil					There is a lack of recognition or action to protect and enhance soil.
Air					While municipal jurisdiction is minor, planning for climate change has helped to address air quality issues.
Watersheds and Fresh Water Ecosystems					Much is being done across the board to effectively improve watersheds, however a review would be worthwhile.
Terrestrial Ecosystems					There is minimal protection on private land for terrestrial ecosystems. Enhancement occurs on parkland but is not measured on private land.
Marine Environment					There is very little being done to protect and enhance the backshore, intertidal, and foreshore habitats.
Urban Forest					There is a strong bylaw and programs to protect and enhance the urban forest, however a review would be worthwhile.
Habitat					There is almost no protection on private land for species at risk. Enhancement of habitat occurs on parkland but is not measured on private land.

The next steps will be to revisit this draft gap analysis after the Resilient Saanich goals and objectives have been set. This will provide deeper analysis and information for the Environmental Policy Framework.



## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

### Appendix A: EXAMPLES OF GOALS & OBJECTIVES FOR LOCAL GOVERNMENT ENVIRONMENTAL POLICY FRAMEWORKS

RSTC Task from the Terms of Reference: "To support Saanich staff in reviewing and preparing the draft goals and objectives of the Environmental Policy Framework during Milestone One"

RSTC Motion from August 13, 2020: "That the Resilient Saanich Technical Committee recommend that staff compile sample goals and objectives from other documents to provide to the committee for the next meeting."

	Calgary	Windsor	Burnaby	Maple Ridge
GOALS	To integrate social, economic and environmental objectives into a coordinated decision-making process to maintain high standards of living, social harmony and environmental quality.	Goal A – Improve Our Air Quality Goal B – Improve Our Water Quality Goal C – Responsible Land Use Goal D – Increase Resource Efficiency Goal E – Promote Awareness	Flow – Water Management Breathe – Climate and Air Quality Live – Land Use Planning and Development Move – Transportation Build – Green Buildings and Energy Prosper – Green and Inclusive Economy Nourish – Food Systems Conserve – Waste Management Manage – Governance, Education and Partnerships Green – Green Space and Habitat	Goal A: Conserve and manage our natural assets Goal B: Design and build sustainable neighbourhoods Goal C: Improve communications and environmental awareness
OBJECTIVES	Ensure environmental considerations are part of all City of Calgary decisions Initiate municipal by-laws and promote legislative initiatives by other orders of government; Ensure our own operations comply with environmental legislation and other environmental requirements. Encourage and demonstrate resource conservation and pollution prevention Communicate with all relevant stakeholders for input into the development of our environmental objectives; Implement and continually improve an environment management system for operational effectiveness.	A1: Develop strategies to reduce cross-border air pollution A2: Increase use of environmentally-friendly products in City facilities to improve indoor air quality A3: Reduce the City's contribution to poor air quality days A4: Reduce and monitor community greenhouse gas emissions A5: Implement and educate residents on the City of Windsor's Anti-Idling By-law A6: Improve the City's traffic flow to reduce vehicular emissions A7: Improve the City's public transportation system to increase ridership A8: Reduce the number of single-occupancy vehicle trips of staff and residents A9: Develop, expand and maintain a connected network of safe bicycling and walking facilities		A1. Protect the District's key ecological resources, such as watercourses, aquifers hubs, corridors, patches, and watersheds. A2. Maintain the health of natural areas. A3. Extend natural connections beyond the municipality. A4. Build ecological resilience for adaptation to climate change and hazards A5. Consider the potential values and financial benefits of undeveloped land in planning. A6. Provide incentives to encourage developers to protect some natural areas. A7. Protect agricultural land in recognition of the values it provides, such as productive soil, wildlife habitat, stormwater infiltration, and food





## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

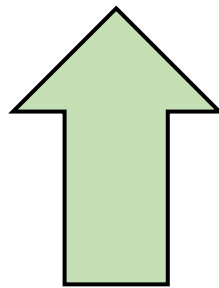
OBJECTIVES	<p>B1: Invest in our sewers and wastewater treatment plant infrastructure          B2: Improve stormwater management to reduce the risk of flooding to residents          B3: Reduce water pollution from City Operations          B4: Improve the health of the Detroit River and Great Lakes Waters          B5: Reduce the per capita use of treated municipal water</p> <p>C1: Encourage in-fill and higher density in existing built areas          C2: Investigate the feasibility of a Regional Growth Plan          C3: Incorporate sustainable development into the design of neighbourhoods, homes and businesses          C4: Expand public understanding of the value of natural spaces and native plants          C5: Develop a coordinated approach to invasive species in parks, natural areas and the public right-of-way          C6: Acquire or transition additional lands for integration into our parks, natural areas and natural heritage system          C7: Protect, enhance and expand the quality and condition of our natural areas and wetlands          C8: Protect and enhance the quality and condition of our urban forest canopy          C9: Increase connectivity within and between our parks and natural areas          C10: Support education, engagement and local food production          C11: Work with the Windsor Essex County Health Unity to develop a Food Strategy          C12: Incorporate cooling designs and features into public spaces to protect residents from extreme heat and ultraviolet radiation exposure          C13: Enhance and increase natural shade as a climate change adaptation measure</p> <p>D1: Decrease community energy consumption and greenhouse gas emissions</p>		<p>B1. Protect and enhance the urban forest, including existing forests and significant trees, with methods to support future tree cover.          B2. Protect important natural and heritage resources within neighbourhoods as part of the planning process where possible, including greenway corridors, watercourses, native soils, and steep slopes          B3. Manage and minimize the impacts of development on protected and natural areas, including erosion of slopes, sedimentation of watercourses, reduced air quality.          B4. Use appropriate best management practices to ensure attractive, sage, and affordable communities.          B5. Use sustainable landscape design and management to reduce energy use, support wildlife, and make neighbourhoods more attractive and livable.          B6. Use alternative transportation as a sustainable design measure to save energy and increase health and recreation opportunities.          B7. Enforce environmental regulations.</p> <p>C1. Improve communication and collaboration among District staff and stakeholders to increase efficiency, improve understanding, and achieve more benefits.          C2. Increase communication about environmental management and its benefits to the public, including financial benefits.          C3. Increase education and engagement opportunities related to experiencing nature and environmental management.          C4. Clarify the steps and requirements involved in the land development process.          C5. Partner with other government agencies, including First Nations, on initiatives of shared interest and benefits.          C6. Partner with non-government organizations on initiatives of shared interest and benefits, and support local stewardship groups in achieving common objectives.</p>
------------	---	--	---



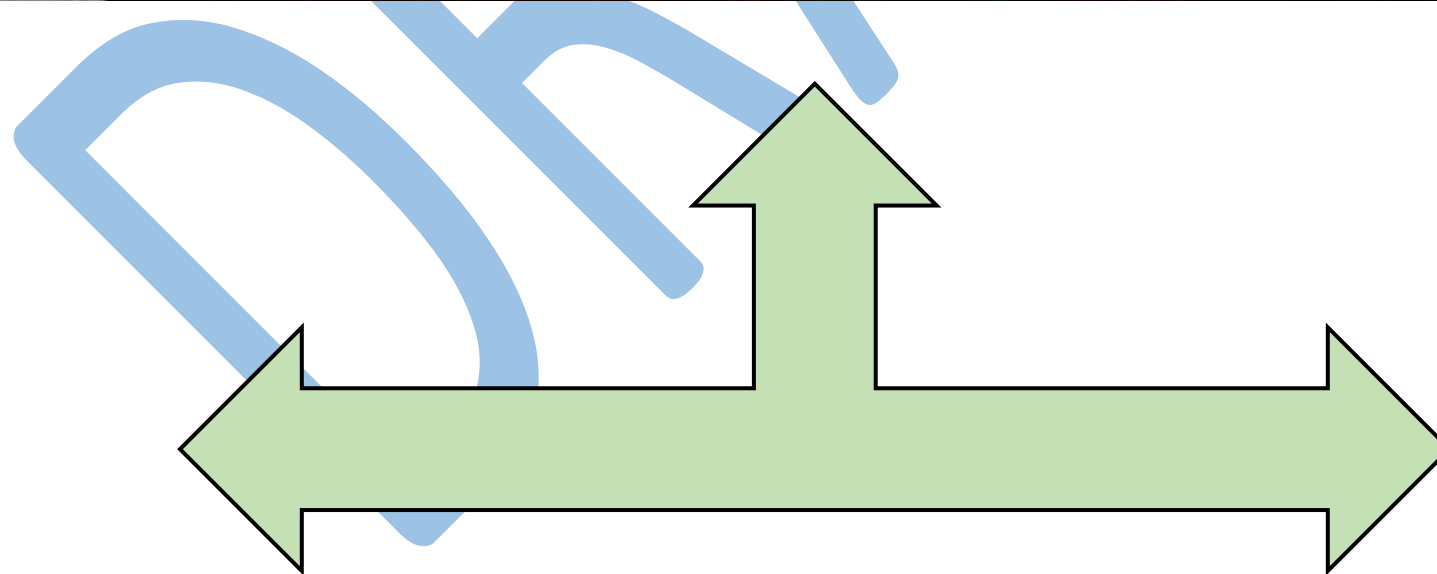
## Resilient Saanich: Draft Environmental Policy Framework Gap Analysis

	<p>D2: Decrease corporate energy consumption and greenhouse gas emissions</p> <p>D3: Consider environmental design in newly constructed or retrofitted municipal projects</p> <p>D4: Increase the diversion rate of recyclable material at all City facilities</p> <p>D5: Increase community waste diversion through recycling and composting</p> <p>D6: Integrate environmental sustainability and climate change into Asset Management</p> <p>E1: Promote the link between environmental health and human health to Windsor residents</p> <p>E2: Report on the progress of the implementation of the Environmental Master Plan</p> <p>E3: Conduct a regular survey of environmental attitudes with residents and staff</p> <p>E4: Develop a corporate environmental education strategy</p> <p>E5: Maintain a web-based environmental information site</p> <p>E6: Increase awareness among residents and stakeholder of the City's environmental programs, policies and initiatives</p> <p>E7: Continue to invest and develop partnerships</p> <p>E8: Ensure involvement of residents and stakeholders in environmental decision making</p> <p>E9: Showcase Windsor's Environmental Commitment outside the Region</p>		
--	--	--	--

Appendix B: Picturing an Environmental Policy Framework



Indicators, monitoring,  
feedback and reporting



Linkages to, and integration  
with, out of scope areas:

- Transportation
- Agriculture
- Recreation
- Land use Planning
- Health
- Business