

A photograph of a field of purple flowers, likely thyme, growing among green grass and other vegetation. The flowers are in various stages of bloom, and the background is slightly blurred, emphasizing the foreground plants.

# Saanich Environmental Policy Framework *Final Draft*

April 2024



## Territorial Acknowledgement

The District of Saanich is within Coast and Straits Salish territory, the territories of the lək'wəŋən peoples, known today as Songhees and Esquimalt Nations, and the W̱SÁNEĆ peoples, known today as W̱JOŁEŁP (Tsartlip), BOKÉĆEN (Pauquachin), S̱ÁUTW (Tsawout), W̱SIKEM (Tseycum) and MÁLEXEŁ (Malahat) Nations. The First Peoples have been here since time immemorial and their history in this area is long and rich.

The District respectfully acknowledges the First Nations' long history of land stewardship and knowledge of the land and will look for opportunities to learn from and collaborate with First Nations to help us improve our community's resilience.

DRAFT

## Contents

Territorial Acknowledgement .....	ii
1. Introduction .....	5
1.1. A Coordinated Approach to Environmental Stewardship .....	5
1.2. Context.....	9
2. Environmental Policy Framework.....	12
2.1. Guiding Principles .....	12
2.2. Environmental Policy Framework Goals.....	13
2.3. Measuring Outcomes.....	15
3. Implementing the Environmental Policy Framework.....	17
3.1. Environmental Policy Gap Analysis.....	17
3.2. Policy Evaluation Tool .....	18
3.3. Public Actions for a Sustainable and Resilient Saanich .....	18
4. Appendices.....	20
A. Resilient Saanich Technical Committee .....	20
B. Gap Analysis .....	21
C. Policy Evaluation Tool .....	25

Initial draft prepared by the

Resilient Saanich Technical Committee with support from Judith Cullington and Associates for District of Saanich Staff April 21, 2023

Revised by District of Saanich Staff with input from RSTC

Cover image: Sea blush © Judith Cullington

DRAFT

# 1. Introduction

## 1.1. A Coordinated Approach to Environmental Stewardship

The Environmental Policy Framework (EPF or the Framework) provides guidance to create a coordinated approach for environmental projects, programs and policies led by Saanich. It outlines Guiding Principles and Goals to assist District staff to align environmental policies and programs to support a Sustainable and Resilient Saanich. It reinforces a strong and united culture of environmental protection and enhancement among staff in their work related to the natural environment.

As outlined through Council's direction (November 6, 2017) and in the Terms of Reference of the Resilient Saanich Technical Committee (original adopted August 9, 2021, with revisions October 25, 2021, and August 22, 2022) the strategic pillars of the Framework include the Climate Plan, a Biodiversity Conservation Strategy, and an enhanced stewardship program. The Terms of Reference also allow for the potential development of a new Environment Development Permit Area (EDPA).

The RSTC through their Terms of Reference further suggested that the EPF should be broad enough to "encompass all aspects of District work related to the environment including the need to update existing bylaws, policies and programs as well as new ones." The TOR further states that "some work will have a direct focus on the environment and others may have a different operational focus that nevertheless have the potential to impact or influence the environment in significant ways."

A draft document was prepared by the Resilient Saanich Technical Committee (RSTC) with support from Judith Cullington. The draft was presented to staff in April 2023. As outlined in the RSTC Terms of Reference, the Committee was to prepare a draft for staff's consideration. Under the direction of the CAO, staff from across the District reviewed the draft and provided input during summer 2023. The RSTC's draft has been revised to incorporate staff feedback to create an implementable framework which is presented in this document. Of note, the proposed framework is focused on:

- Eight principles and two goals,
- New and revised environmental policies and programs, and

- Supporting staff in their ongoing work on projects and policies that relate to the environment across departments including those that impact the environment while focused on other objectives.

### **Natural environment**

Saanich’s physical setting contains a mix of marine shoreline, freshwater lakes, natural watercourses, and diverse rolling topography with elevations ranging from sea level to 355 m. The landscape includes glacially scoured rock outcroppings, farmland, dense woodlands, and an extensive system of open space and parkland. Approximately half the Municipality is urban and half rural/agricultural – a dual role that has influenced its character and development (Saanich Draft OCP, May 2023).

In this document, “natural environment” encompasses entities and processes:

- all living and non-living things occurring naturally within the District of Saanich,
- the interactions of all living species, climate, weather and geologic and abiotic processes.

As stated in Saanich’s Official Community Plan<sup>1</sup> (OCP) vision, a healthy natural environment is a fundamental priority for Saanich Council and residents:

*“Saanich is a sustainable and resilient community where a healthy natural environment is recognized as paramount for ensuring social well-being and economic vibrancy, for current and future generations.”<sup>2</sup>*

This importance is emphasized in numerous OCP policies (May, 2024), Saanich-wide plans and strategies, department specific plans and strategies, and committees of Council such as the “Sustainability and Climate Action” and “Natural Areas, Parks and Trails” committees.

In addition, Saanich residents place a high importance on a healthy natural environment. This is demonstrated by their strong interest and involvement in maintaining and enhancing the natural environment on their own properties and through assisting with environmental stewardship on public lands through Saanich’s Pulling Together Program, Park Ambassadors, and other environmental stewardship programs.

---

<sup>1</sup> [2023 OCP](#) .

<sup>2</sup> <https://www.saanich.ca/EN/main/community/community-planning/official-community-plan-ocp.html>, page 23.

The EPF's Guiding Principles and Goals are consistent with the Saanich Vision in the OCP (May 2024) and will guide Saanich's approach to protecting and enhancing the natural environment (Figure 1). Plans, policies, and programs within each theme area (such as climate action, biodiversity conservation, and enhanced stewardship) operationalize the goals of the Framework and support Council's goals of Climate Action and Environmental Leadership (Council's Strategic Plan 2023-2027). This will ensure that Saanich stewards the environment, that its building typologies and infrastructure reflect Saanich's environmental and climate concerns, and that it continues to develop innovative solutions and implement best practices to reduce emissions, mitigate and adapt to the effects of climate change, and protect the environment.

DRAFT

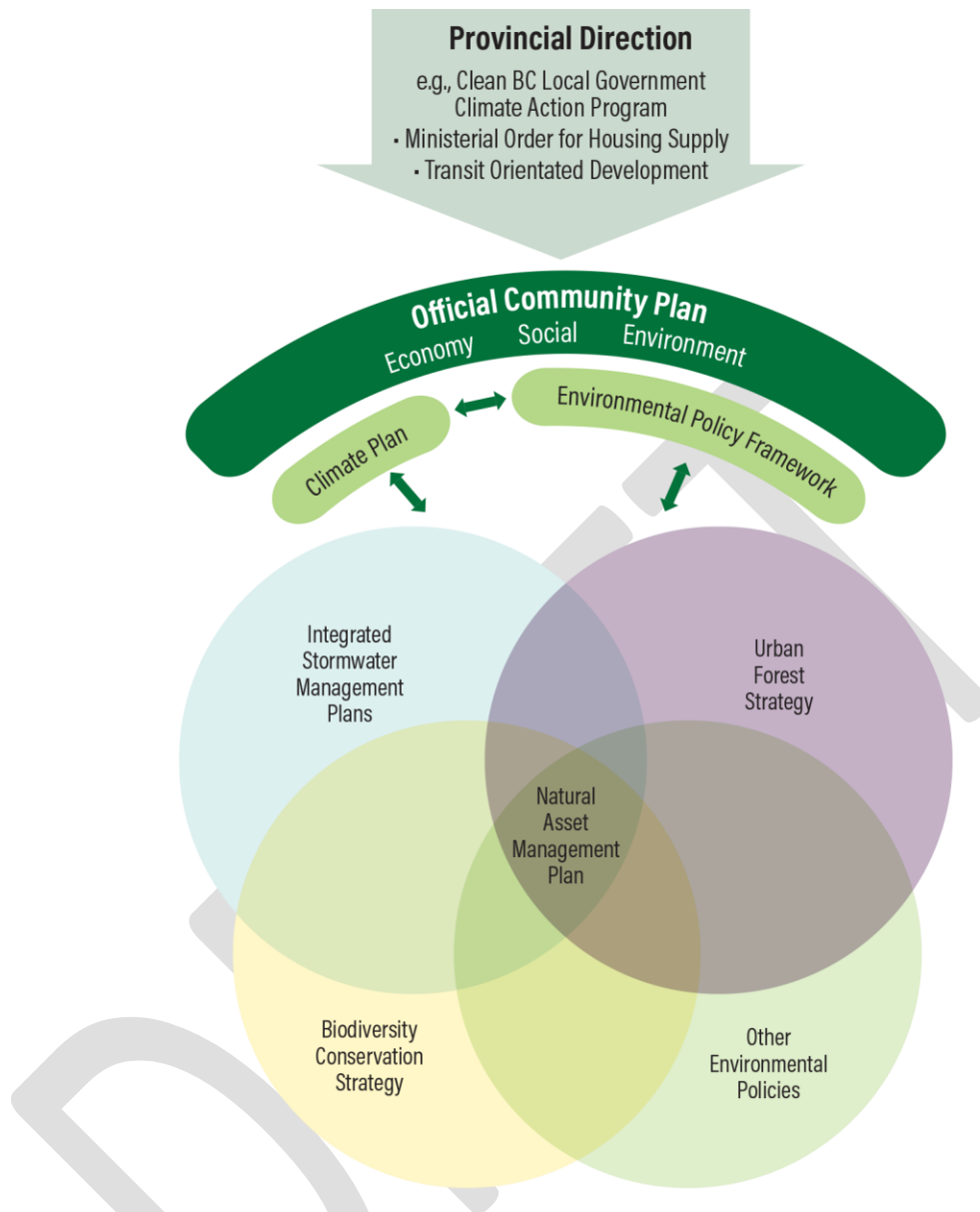


Figure 1: Conceptual diagram: Environmental Policy Framework

Saanich’s OCP states:

“Environmental protection and climate action are priorities for the District of Saanich and fundamental components of a healthy, resilient, and sustainable community. Maintaining adequate green space, biodiversity, and well-functioning natural areas is important to both ecosystem health and human health. It is also a central component of One Planet Living [note: this is a cornerstone policy of the revised OCP].”



## 1.2. Context

As noted in the territorial acknowledgement at the outset of this document, the Lək̓ʷəŋən and the W̱SÁNEĆ peoples have been caring for the land known now as Saanich since time immemorial. Their role as protectors of the land continues to be vital today. The District of Saanich recognizes that importance, entering into a Memorandum of Understanding ([ÁTOL,NEUEL, “Respecting One Another”](#)) with the W̱SÁNEĆ Leadership Council (WLC) formalizing Saanich’s commitment to reconciliation and pursuing opportunities for collaboration including opportunities for indigenous people to practice traditional activities in Saanich. While the District has a formal MOU with the WLC, it remains committed to working with the Lək̓ʷəŋən peoples known today as the Songhees and Esquimalt Nations as well as with other indigenous people that live and work in the District.

As outlined in Saanich’s OCP, Saanich is home to some of B.C.’s most unique and rare ecosystems and species. These include biologically diverse areas of Coastal Douglas- fir forests and remaining pockets of Garry Oak ecosystems. Saanich also has a rich marine foreshore, productive lakes and wetlands, and complex river systems. These support a diversity of plant, insect, fish, and wildlife populations and communities. Local indigenous people cared for land, water and the plants and animals that lived there to ensure that future generations could be sustained. Their relationship with ecosystems and all that they contain is one of respect.

Saanich’s natural areas also provide important ecosystem services such as filtering water, purifying the air, supporting pollinators, regulating climate, and storing carbon that would otherwise contribute to climate change. Natural areas support the District’s stormwater management by reducing flooding and filtering contaminants. Protecting and enhancing natural areas ensures that they will continue to provide these vital services. It also makes them more resilient to urban development, climate change, and other pressures.

There are numerous and growing threats to natural areas. In addition to the threat of loss of indigenous culture and practices, there are direct permanent impacts such as the clearing of natural ecosystems for urban development, indirect impacts from human activity such as invasive species, and the changes brought upon the natural environment by sea level rise, drought, wildfires, and storms. Often, these threats and impacts are interconnected and compounding. For example, plant stress caused by climate change can increase plants’ vulnerability to pests and diseases and urban development can cause increased environmental disturbance and fragmentation which can facilitate the spread of invasive species. While some of these impacts are permanent, others can be mitigated through ecological restoration activities.

The Resilient Saanich initiative is an integral component of the District's response to biodiversity loss, climate change, and the many threats facing its natural areas. Initiated in 2020, Resilient Saanich includes this Environmental Policy Framework to provide strategic direction for new and existing environmental policies and programs with an initial focus on the Climate Plan, the Biodiversity Conservation Strategy, and an enhanced stewardship program. As these are completed, other environmental policies and programs will be drawn into this framework. This phased approach based on a gap analysis allows for Saanich to integrate policies and programs related to the environment in a manageable and purposeful manner given current and future capacity and competing priorities.

In September 2023, the Province provided Saanich with specific Housing Targets that through an Order in Council requires Saanich to provide 4,610 new units in five years (just over 900 a year, which is three times the current average). To fulfil this Order, Saanich is working on a number of ways to facilitate housing development. The EPF and associated plans and policies must work together with housing development policies and processes to ensure Saanich meets its Order and continues to be a community with strong environmental qualities and values.

DRAFT

## Background: Environmental Policy Framework

Saanich introduced an Environmental Development Permit Area (EDPA) bylaw in 2012. This bylaw was created to ensure that new subdivisions and/or structures would not harm native species, rare and endangered ecosystems, and/or natural features. The bylaw proved controversial in its implementation. Some Saanich residents expressed strong disfavour with its enactment, resulting in its rescindment by Council in 2017. At the same time, many residents were in favour of keeping the bylaw in place.

Following the decision to rescind the 2012 EDPA, Saanich Council sought an alternative to accomplish the goal of environmental protection in the District with broader public support. An overarching framework for improved coordination of environmental programs and policies was initiated. In November 2017, Council passed a motion:

*“That Council direct staff to bring Council a report as soon as possible on the potential of developing a Saanich program which includes the topics of Climate Adaptation, a Biological Conservation Strategy, and Stewardship Program to serve as a policy framework for other Saanich environmental policies and programs, and a new Environmental Development Permit Area be considered part of this program; and that the Diamond Head report recommendations be considered a component of this report.”*

The **Resilient Saanich Technical Committee** was established as an independent technical committee of natural resource practitioners and specialists. The purpose of this Committee, as outlined in its [terms of reference](#), is to “provide independent analysis, recommendations and other input as might be helpful to Council, Staff and consultants to shape and inform the development of an Environmental Policy Framework.” Tasks assigned were:

- ◆ Rationalize existing and new environmental policies and programs into the Framework;
- ◆ Develop a new Biodiversity Conservation Strategy\* and enhanced Stewardship Program to serve with Saanich’s new Climate Plan as the strategic pillars for the Framework;
- ◆ Evaluate the strength of the Environmental Policy Framework (EPF) and the Biodiversity Conservation Strategy (BCS) to replace the EDPA.
- ◆ Identify a range of potential policy tools, possibly including a new EDPA, for managing the environment in Saanich.

\* Contracted to Diamond Head Consulting to complete.

## 2. Environmental Policy Framework

### 2.1. Guiding Principles

The Environmental Policy Framework Guiding Principles serve to guide Saanich's existing and new environmental policies and practices. Principles were developed by the RSTC and endorsed by the Committee in August 2023. Staff have made revisions for comprehension and consistency with other policy directives. They are consistent with the District's [Strategic Plan](#)<sup>3</sup> and OCP Vision.

The eight Guiding Principles of the Environmental Policy Framework are:

- 1. Recognize the intrinsic value of nature.*
  - This is an ethical commitment to recognize and respect the right to existence of other life forms and the ecological processes that support us all.
- 2. Build relationships and undertake appropriate actions of reconciliation with indigenous groups and First Nations. For example, action the ATOL, NEUEL Memorandum of Understanding with the WSÁNEĆ Leadership Council.*
- 3. Use evidence-based decision making; adopt the precautionary principle when supporting science or data are not available.*
- 4. Monitor implementation with clear metrics and commit to continuous improvement and innovation using best practices.*
- 5. Work actively with neighbouring jurisdictions, organizations, and initiatives to achieve results at a bioregional scale.*
- 6. Address climate adaptation and mitigation in decisions.*
- 7. Collaborate with people of diverse interests and backgrounds to develop more durable, fair, and effective environmental policies and programs.*
- 8. Ensure open, accurate environmental information to encourage an informed citizenry that participates in building policies and programs for a more resilient Saanich.*

---

<sup>3</sup> District of Saanich Strategic Plan 2023-2027.

Section 3.2 and Appendix C discuss how these Guiding Principles can be used as a tool to assist in the development of new environmental policies and programs and to evaluate existing policies when being updated.

## 2.2. Environmental Policy Framework Goals

Two goals are suggested to frame an approach to implementing the EPF.

### **Goal 1. Fulfil objectives of the Natural Environment Section of the OCP through a variety of programs.**

Goal 1 aims to enhance biodiversity and essential ecosystem services through direct actions to protect, restore, and enhance the natural environment.

Examples of actions carried out by Saanich, partners and property owners that would support this goal include:

#### **On-the-ground activities:**

- ◆ Restoration and enhancement of natural parklands.
- ◆ Daylighting of streams where there is greatest positive benefit.
- ◆ Identification, protection, restoration, and enhancement of sensitive ecosystems including riparian areas and marine foreshores.
- ◆ Protection, maintenance, and enhancement of the urban forest.
- ◆ Restoration and enhancements of private lands (such as backyards) and larger holdings.
- ◆ Increased support for the Pulling Together, the Park Ambassadors Volunteer Programs, and other stewardship initiatives on public and private lands.
- ◆ Assessment of the condition of Natural State Covenants in Saanich.

#### **Environmental education and outreach:**

- ◆ Encouraging citizen science monitoring.
- ◆ Promoting sustainable agriculture practices.
- ◆ Promoting pollution source reductions.
- ◆ Promoting more “environment-friendly” developments.
- ◆ Encouraging backyard biodiversity.
- ◆ Fostering key strategic partnerships (ex. First Nations, HAT, School Districts, etc.).



**Internal Saanich activities:**

- ◆ Improvement of ecosystem and biodiversity monitoring and mapping in the District.
- ◆ Developing management plans for parks and natural areas that include protection, enhancement and restoration of natural areas and biodiversity.
- ◆ Completing a gap analysis following the outline in this document or another methodology.

Achieving this goal requires implementation of key strategies and actions including the Biodiversity Conservation Strategy, the Climate Plan, the Natural Assets Management Plan, and the Urban Forest Strategy.

**Goal 2. Foster complementary and coordinated policies, strategies, regulations, and incentives and align them with the Environmental Policy Framework Guiding Principles and the OCP.**

Goal 2 promotes a culture of environmental stewardship and accountability within Saanich so that environmental impacts may be considered in operational actions and Council decisions. While environmental impacts are already considered in many projects and programs, this goal focuses on the need for a coordinated and aligned approach to minimize unintended consequences. The EPF Guiding Principles will help guide the development of future environmental policy.

Actions related to this goal are shared throughout the District and can be found within the Climate Plan, the Biodiversity Conservation Strategy, the Urban Forest Strategy, Natural Assets Management Plan (to be developed), and Integrated Stormwater Management Plans (in development). Examples of actions that would support this goal are:

- ◆ Assessing existing regulatory, management, and administrative tools to identify gaps and inconsistencies with the Guiding Principles using the suggested Policy Gap Analysis.
- ◆ Using the Policy Evaluation Tool (Appendix C) to demonstrate support of the Guiding Principles.
- ◆ Planning and preparing new environmental programs and policies.
- ◆ Promoting ongoing inter-departmental cooperation to evaluate and address environmental impacts of policy decisions and enhance environmental benefits.
- ◆ Promote District wide training on environmental protocol process and the use of the Policy Evaluation Tool and policy gap analysis tools.

## 2.3. Measuring Outcomes

Progress towards meeting the goals of the Environmental Policy Framework will be measured primarily through the outcomes of new and revised environmental policies and programs.

Goal 1 urges on-the-ground action towards a more sustainable and resilient Saanich through implementation of the objectives in the OCP. These will be achieved mainly through the implementation of the Biodiversity Conservation Strategy, the Climate Plan, the Urban Forest Strategy, the Natural Asset Management Plan, and other plans as they are developed. Progress can be reported regularly through these individual plans and strategies or could be reported using a more central approach such as a State of Saanich Environment report, repeated at appropriate intervals. A centralized report might look at indicators such as:

- ◆ Hectares of Saanich that have been protected (acquisition or protection) restored or enhanced (including clearing of invasives and restoration planting),
- ◆ Changes in urban forest canopy cover (positive or negative),
- ◆ Kilometres of stream restoration/enhancement and kilometers of stream in natural conditions,
- ◆ Sensitive ecosystems in “protected” status,
- ◆ Stable or increasing population abundance of SAR species currently identified in Saanich (monitored at 5 or 10 year intervals).
- ◆ Stable or increasing population abundance of culturally important species such as salmon.
- ◆ Stable or improving air quality in Saanich.
- ◆ Percentage of the Saanich population with access to and involved in natural areas for recreation and health benefits.

Goal 2 guides District staff to build and continue to align policies, strategies, regulations and incentives aligned with the EPF’s Guiding Principles. Implementation of the Climate Plan, Biodiversity Conservation Strategy, Urban Forest Strategy and the Natural Asset Management Plan are examples where staff can continue to work across departments to fulfil goals and actions. Indicators of progress could include:

- ◆ Projects and policies that affect the environment that have been developed following the Principles of the Environmental Policy Framework and/or to fill gaps identified via the Policy Gap Analysis Tool.
- ◆ Projects and policies that affect the environment that have been developed using an inter-departmental approach.

- ◆ Regular public reporting of progress on specific environment-related strategies and plans (or a centralized “state of environment” type of reporting).
- ◆ Public awareness of the environmental values noted in the OCP that Saanich is aiming to implement and realize.
- ◆ Percentage of staff receiving training on what Resilient Saanich means, the Environmental Policy Framework and associated tools (gap analysis and policy evaluation).

DRAFT

## 3. Implementing the Environmental Policy Framework

The Environmental Policy Framework is intended to apply to new or revised policies and programs related to the natural environment. A phased approach to implement the Framework is recommended beginning with, but not limited to, the items that Council outlined in their direction in 2017: the Climate Plan, the Biodiversity Conservation Strategy, and an enhanced stewardship program. Further environment related policies and programs can be brought under the framework as they are developed or revised. Implementing this framework will include consideration of the Guiding Principles along with the Goals outlined in the previous sections.

The following steps are recommended for guiding implementation of this Framework:

1. Carry out a public engagement on this draft Environmental Policy Framework.
2. Present a final draft Environmental Policy Framework to Council for endorsement.
3. Orient staff District-wide to the Framework's Guiding Principles and goals including how to use them to guide new policy and program development (use of the EPF Evaluation Tool). This would include an environmental policy gap analysis to identify new policies, bylaws and strategies required to fulfil the key environmental strategies, and the policy evaluation tool.
4. Apply the Environmental Policy Framework in the upcoming update of the [Climate Plan: Renewable and Resilient Saanich](#).
5. Encourage and support public actions that relate to the primary pillars of the EPF (Climate Plan, Biodiversity Conservation Strategy and enhanced stewardship program).
6. Resource priority actions on public lands that relate to the primary pillars of the EPF.

### 3.1. Environmental Policy Gap Analysis

The Environmental Policy Framework will assist in coordinating municipal policies focused on protecting Saanich's natural environment. An environmental policy gap analysis is a first step. A gap analysis would:

1. define what comprises Saanich's natural environment in appropriate breadth and detail,
2. document existing and emerging stressor/threats to Saanich's natural environment,

3. identify (and assess) existing Saanich policies meant to protect the natural environment and other policies which may damage the natural environment,
4. link environment components, stressor/threats, and policies, and
5. identify the gaps -- aspects of Saanich's natural environment not currently or adequately addressed by policy.

An initial gap analysis was carried out by staff in 2020 and shared with RSTC. The RSTC has proposed a more thorough methodology in a separate document entitled *RSTC Environment Policy Gap Analysis Assessment 2023*. More detail about how to use the RSTC methodology is provided in Appendix C. Staff may choose to use the suggested gap analysis or use an alternate approach.

\*Policies include all District of Saanich instruments that are used to manage the environment. This covers policies, bylaws, strategies, programs, guidelines, etc.

### 3.2. Policy Evaluation Tool

The Resilient Saanich Technical Committee developed a Policy Evaluation Tool to provide staff with a suggested method to evaluate new and existing policies or programs to determine how closely they fulfil the intent of the Framework's Guiding Principles. When the Guiding Principles can be met, trade-offs should be documented.

Two options are provided: a matrix which could work well when reviewing existing policies and a set of questions that can be used to guide policy and program development. Both options are based on the Guiding Principles in Appendix D.

### 3.3. Public Actions for a Sustainable and Resilient Saanich

Actions by residents (and non-residents) of Saanich influence the ability to achieve a more Sustainable and Resilient Saanich. The District plays a role in educating and supporting community organizations and residents in ways to protect and enhance the natural environment at home and in the community.

Saanich has a long history in environmental leadership driven by the interests and actions of residents and community groups. There are many examples of long-standing community-based projects that have positive impacts on the environment. The District has responded with key guiding policy such as the Official Community Plan, the 2010 Urban Forest Strategy, Invasive Species Strategy, and longstanding programs such as the Pulling Together Volunteer Program, and the Native Plant Salvage Program to name a few.



This Framework seeks to build on Saanich’s environmental leadership through the implementation of the Climate Plan, the Biodiversity Conservation Strategy and an enhanced stewardship program, all of which will require community and resident involvement to carry out actions, along with future policies and programs that focus on the natural environment.

DRAFT

## 4. Appendices

### A. Resilient Saanich Technical Committee

RSTC Members, selected by Saanich Council:

- Kevin Brown, Terrestrial Ecology
- Tim Ennis, Conservation Planning and Management
- Purnima Govindarajulu, Conservation and Restoration Ecology
- Stewart Guy, Conservation Planning and Management
- Jeremy Gye, Urban Forestry
- Tory Stevens, Terrestrial Ecology
- Brian Wilkes, Aquatic Ecology
- Chris Lowe, Marine Ecology

RSTC Members that served for a part of the process:

- Brian Emmett, Marine Biology
- Tiffany Joseph, W̱SÁNEĆ Steward
- Kear Porttris, Indigenous Knowledge
- Bev Windjack, Landscape Architecture

## B. Gap Analysis

### Introduction

An Environmental Policy<sup>4</sup> Gap Analysis (EPGA) is central to the Environmental Policy Framework (EPF). The approach outlined here is suggested by the RSTC.

Municipal policies may (1) intentionally seek to protect the natural environment, (2) incidentally address and benefit components of the natural environment, or (3) even conflict with stated desires to protect the natural environment. Over time, gaps or conflicts in policies protecting the natural environment may arise as new data or issues emerge, as community values evolve, and as policies accumulate. An EPGA is a way to periodically take stock of gaps and conflicts in municipal environmental policy.

An EPGA should identify if and how different components of the natural environment are addressed by existing policy, assess their effectiveness or impact, and guide policy improvement or development to address those gaps. An EPGA should facilitate policy analysis and communication within the District and broader community. It should be a “living” document, updated as policies change and understanding of local environmental issues increases.

More specifically, the EPGA should:

1. define what comprises Saanich’s natural environment in appropriate breadth and detail,
2. document existing and emerging stressor/threats to Saanich’s natural environment,
3. identify (and assess) existing Saanich policies meant to protect the natural environment and other policies which may damage the natural environment,
4. link environment components, stressor/threats, and policies, and
5. identify the gaps -- aspects of Saanich’s natural environment not currently or adequately addressed by policy.

The powers of municipal government are limited to those granted by senior levels of government. That may constrain policy options for municipal government. Hence, assessments of the “adequacy” of municipal policies should explicitly note those constraints.

RSTC has proposed that specific gap analyses are appropriate for individual policy areas. A functional higher-level EPGA will complement and not conflict with individual gap analyses. A functional EPGA could potentially better identify policies with multiple environmental benefits (or impacts) and confirm what components of natural environment are not addressed by existing policies. Conversely, individual policy area gap analyses can provide more detailed analyses suitable for a given policy area.

---

<sup>4</sup> By “policy”, we refer to legislation, regulations, policies, strategies, guidance, or any other documents formally recording policy decisions approved by Council (e.g., Government of British Columbia. 2020. Policy approaches handbook [https://www2.gov.bc.ca/assets/gov/government/about-the-bc-government/regulatory-reform/pdfs/policy\\_approaches\\_playbook.pdf](https://www2.gov.bc.ca/assets/gov/government/about-the-bc-government/regulatory-reform/pdfs/policy_approaches_playbook.pdf))

A well-constructed list of natural environment components and potential threats can also provide a checklist to aid in environmental assessments of “non-environmental” policies and specific projects.

The existing draft EPGA (EPGA2020) was prepared by staff in late 2020 and briefly reviewed by RSTC at that time but not revised. Given the subsequent development of related reports (State of Biodiversity (SOB), State of Urban Forest (SUF), Biodiversity Conservation (BCS) and Urban Forest Strategies (UFS) strategies), recent changes in provincial government legislation to increase housing density, and research done by RSTC members during the Resilient Saanich process, it seemed timely to re-examine and update EPGA2020.

Suggested revisions to EPGA2020 are itemized in a separate report, entitled: *RSTC Environment Policy Gap Analysis 2023*. Briefly, the revisions make the breadth and detail of “natural environment” and stressor/threats more complete and appropriately detailed; the list of Saanich policies that affect the natural environment (and how) could be more comprehensive; and the links between specific policies and components of environment clearer. They would make EPGA2020 more complete, transparent, useable, and updateable.

The separate report proposes a revised approach to the EPGA and includes:

1. Review of EPGA2020 and suggested revisions.
2. Tables containing (a) suggested updated components of the Saanich “natural environment”, and (b) associated stressors/threats, (c) a table summarizing key points from each policy as it relates to natural environment, and (d) spreadsheet listing Saanich policies and showing their links to components of natural environment.
3. A longer version of this document which explains spreadsheet components and how they are linked; how policies might be assessed; and suggested next steps.

The separate report is not a completed revised EPGA. The list of policies and how to assess them is incomplete and the report does not attempt to summarize the status or condition of the natural environmental components, the magnitude or severity of stressors/threats, or set priorities for action. Ultimately, those assessments are essential but require data which may not exist. By providing a clear sequence of steps, underlying rationale, and specific “to-dos”, however, we hope that the method described in the report will facilitate a useable and updateable EPGA that benefits District staff and the broader community.

A brief outline of the key elements of the gap analysis approach elaborated in the separate *RSTC Environment Policy Gap Analysis 2023* report follows.

## **Defining natural environment components and potential stressor/threats**

### ***Definition of natural environment components***

A necessary first step is to define and identify components of “natural environment” to facilitate linking environment, stressor/threats, and Saanich policies. What should be included in “natural environment” and how should it be represented?

The Official Community Plan defines natural environment, but that definition is less specific than that preferred by the RSTC in the context of the EPGA and EPF. “Natural environment” could include:

1. abiotic factors necessary for life;
2. physiography arising from planetary processes;
- 3a. biota and ecosystems that occurred on southern Vancouver Island pre-European settlement and still could given adequate habitat;
- 3b. species which are introduced and which provide ecological goods and services (e.g., non-native trees) and which may become “naturalized”;
- 3c. species whose natural range may expand to southern Vancouver Island with climate change.

RSTC considers invasive species to be a stressor/threat to native ecosystems but recognize that their roles and potential benefits may differ in future “novel” urban environments. A more detailed definition is in the separate *RSTC Environment Policy Gap Analysis 2023* report.

### ***Stressors/Threats***

Stressors/threats and the actions that produce them link municipal policies and components of the natural environment. Policies typically address actions that threaten (or could benefit) the natural environment.

Classifying stressor/threats in a way which relates both to components of environment and to local government policy is inherently complicated. For example:

1. the local natural environment can be impacted both by local actions that can be controlled locally and impacted by global stressor/threats that are not controllable locally.
2. local stressor/threats vary in their proximity to the stress they cause and can be difficult to clearly separate from their sources (e.g., human actions).
3. actions which are sources of stressor/threats may also be beneficial to biodiversity/ecosystems.
4. Our scientific understanding of what constitutes threats to biodiversity in urbanized landscapes is increasing dramatically.

Some municipal policies may have little direct impact on Saanich’s natural environment but directly affect biodiversity and ecosystems elsewhere, as per the “ecological footprint” concept (Wackernagel and Rees 1996). Policies with such beneficial impacts could include encouraging salvage and reuse of building materials from deconstructed houses or requiring concrete used in municipal infrastructure to contain recycled aggregate and other “waste” materials and thereby reduce impacts of extracting and processing virgin materials elsewhere.

A full list of stressors and threats is included in the separate report entitled *RSTC Environment Policy Gap Analysis 2023*, tables 2a, b and c.



### ***Saanich Policies***

Approximately 260 Saanich bylaws, council policies, and other strategic documents were found on the District website as of July 2023. Other relevant policies such as departmental policies are not shown on the public website and were not examined. In the separate report *RSTC Environment Policy Gap Analysis 2023*, policies were viewed through a “natural environment” lens to assess how they might potentially positively or negatively affect the natural environment. This task has not been finished. However, enough progress has been made to show how the gap analysis can be completed.

### ***Linking environment, stressor/threats, and policies***

An EPGA should clearly link policies to environment and/or to stressor/threats. EPGA2020 does not. To do so, we suggest sorting policies by the component of environment or stressor/threats they address and then summarizing how each policy addresses environment or stressor/threats. The information can be then used to evaluate how Saanich policies positively or negatively affect Saanich’s environment.

One application of the above information is “top-down”. For example, how many policies address different components of the natural environment? Do policies conflict? What policies have multiple environmental benefits? How well do existing policies protect components of the natural environment that they address?

A second application of the information is to confirm suspected gaps in policies pertaining to specific components of environment or stressor/threats. Both approaches are possible and informative.

Examples of both approaches are presented in detail in the separate report *RSTC Environment Policy Gap Analysis 2023, Appendix EPGA\_3*.

## C. Policy Evaluation Tool

A means of evaluating new policies or programs is recommended to determine how closely they fulfil the intent of the Guiding Principles and achievement of Goal 2. The Evaluation Tool not only helps with the process of policy/program/strategy/incentive development but can also be used to demonstrate how various policies work in coordination to support the Environment Policy Framework and Resilient Saanich overall.

The Resilient Saanich Technical Committee has suggested two approaches:

1. A simple approach is to use the set of guiding questions related to the Principles as outlined below
2. An alternative approach is to use the proposed criteria in the table to determine if a policy has a high, medium, or low relevance to each principle. A neutral category is added for policies or programs that have no relevance to a principle, and there is a category for evaluating if a policy or program might work against a principle. The final evaluation of a policy or program would be to weigh the determinations for all the principles to draw a conclusion about how close, overall, a policy or program comes to fulfilling the intent of the principles and achievement of Goal 2.

### Option 1: Guiding Questions

The set of questions below can be used to serve as a thought or process tool to help develop policies, programs, regulations, strategies and incentives. Meeting the Guiding Principles will promote the goals of the Environmental Policy Framework and environmental sustainability in the face of challenges such as climate change and habitat modification. The Evaluation Tool could also be used post-hoc on existing policies, programs, regulations, strategies, and incentives to ensure that they work in a coordinated way to achieve the goals of the Environmental Policy Framework.

*1. Recognize the intrinsic value of nature.*

This is an ethical commitment to recognize and respect the right to exist of other life forms and the ecological processes that support us all.

Does the policy actively promote, protect and enhance biodiversity conservation and the sustaining abiotic and biotic processes (nature)?

- 2. Build relationships and undertake appropriate actions of reconciliation with indigenous groups and First Nations. For example, action the ATOL, NEUEL Memorandum of Understanding with the WSÁNEĆ Leadership Council.*

Have relevant Nations and indigenous groups been involved in policy development (redevelopment)?

*3. Use evidence-based decision making; adopt the precautionary principle when supporting science or data are not available.*

Has a literature review and/or assessment of similar policies in other jurisdictions been conducted (if developing new policy)?

Has previous policy been evaluated (if updating existing policy) for effectiveness and/or challenges?

Has the capacity for monitoring and continuous improvement been built into the policy?

Are areas of uncertainty identified? Are precautions in place?

*4. Monitor implementation with clear metrics and commit to continuous improvement and innovation using best practices.*

Is policy development coordinated between all departments?

Are best practices identified and committed to?

Is there a clear commitment to continuous improvement?

*5. Work actively with neighbouring jurisdictions, organizations, and initiatives to achieve results at a bioregional scale.*

Has the policy been discussed with or borrowed from relevant neighbouring jurisdictions?

If relevant, does the policy have a positive impact on resilience at a bioregional scale?

*6. Address climate adaptation and mitigation in decisions.*

Does the policy meet or exceed actions identified in the Climate Plan?

*7. Collaborate with diverse interests and backgrounds to develop more durable, fair, and effective environmental policies and programs.*

Is public engagement relevant? And if so, at what level of IAPP?

Is the policy development relevant to using a diversity and inclusion lens as per Saanich's Diversity and Inclusion Plan?

8. *Ensure open, accurate environmental information to encourage an informed citizenry that participates in building policies and programs for a more resilient Saanich.*

Does the policy provide for improved environmental information? Can it be made public?

DRAFT

## Option 2: Policy Evaluation Tool

### Policy Evaluation Tool to promote adoption of Environmental Policy Framework Principles

As part of the Resilient Saanich Program, Council requested a policy and program evaluation tool for reviewing new and existing programs and policies against Goal 2 of the Environmental Policy Framework (EPF)

**Goal 2. Foster complementary and coordinated policies, strategies, regulations, and incentives and align them with the Environmental Policy Framework Guiding Principles and the OCP.**

This overarching goal is essential to promote the culture of environmental stewardship and resilience within Saanich staff and the public. The principles will assist in evaluating existing policy and provide guidance for the development of future policy.

Some of the actions that could result from this goal are:

- Assess existing regulatory, management and administrative tools to identify gaps and inconsistencies.
- Develop a strategic approach that encourages effective use of limited resources.

Increase community understanding of policies, plans, programs, bylaws, and partnerships encompassed by the Resilient Saanich Environmental Policy Framework.

The Evaluation Tool below is designed to serve as a thought or process tool to help development of policies, programs, regulations, strategies, and incentives that adhere to the principles articulated in the Environmental Policy Framework. Adhering to the principles will promote the goals of the Environmental Policy Framework and environmental sustainability in the face of challenges such as climate change and habitat modification. The Evaluation Tool can also be used post-hoc on existing policies, programs, regulations,

strategies, and incentives to ensure that they work in a coordinated way to achieve the goals of the Environmental Policy Framework.

The RSTC suggests two possible approaches to evaluation of adherence to each principle and the one chosen will depend on the nature of the policy or program. A qualitative approach is to use the proposed criteria in the table to determine if a policy has a high, medium, or low adherence to each principle. A more numerical approach is the use of a scoring scale for adding numerical scores to the criteria in the table for each principle. For example, a high score would be equivalent to three points, a medium to two points etc. A neutral category is added for policies or programs that have no relevance to a principle, which may be scored as NA or a numerical score of zero. There is also a category for evaluating if a policy or program works against a principle which would be assessed as “negative” or be given a negative numerical score.

The final evaluation of a policy or program would be to weigh the determinations for all the principles and to assess how close, overall, a policy or program comes to fulfilling the intent of the principles and achievement of Goal 2. A numerical approach may be useful when comparing policy or program alternatives. Policies and programs that score high could be submitted to Council for adoption, with documentation from the Evaluation Tool to demonstrate support for the goals of the Environmental Policy Framework and ultimately to a Resilient Saanich. The Evaluation Tool not only helps with the process of policy/program/strategy/incentive development but also demonstrates to the public how the various policies work in coordination to support the Environment Policy Framework and Resilient Saanich overall. Policies and program initiatives that score in the mid-low range can be re-examined to see where they can be enhanced before adoption.

Note: for new policy initiatives, trials suggested the questions approach outlined in Option 1 seemed applicable. For evaluating existing policy, trials showed that using the approach in Option 2 was not time consuming and was very effective.

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
1	<i>Recognize the intrinsic value of nature</i>	Actively promotes, protects and enhances biodiversity conservation and the sustaining abiotic and biotic processes (nature) by awarding recognition and incentives.	Indirectly supports biodiversity conservation with strong mitigation measures	Implements some mitigation or offset measures	Neither promotes nor negates biodiversity	Actively leads to loss of habitat and biodiversity
2	<i>Build relationships and undertake appropriate actions of reconciliation with indigenous</i>	Relevant nations involved in policy development from start to finish	Relevant nations engaged and support in principle	Relevant nations contacted but active support unclear/not clearly articulated	No engagement	One or more nations actively against this policy

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
	<i>groups and First Nations.</i>					
3	<i>Use evidence-based decision making adopt the precautionary principle when supporting science or data are not available.<sup>5</sup></i>	To score at this level policy should meet all <u>relevant</u> criteria below.  1. If it is a new policy, a literature review and effectiveness assessment of similar policies in other jurisdictions has been completed. If updating existing	To score at this level, policy meets at least criteria 1 <u>and</u> 2 and either criteria 3 or 4 in the high category.	To score at this level, policy meets criteria 1 <u>and</u> 2 in the high category but not criteria 3 or 4.	To score at this level, policy meets either 1 or 2	The policy does not review past policies, published literature, nor does it apply the precautionary principle or available evidence. The policy may pose risks to environmental values in the pursuit of achieving other values.

<sup>5</sup> Evidence-based decision-making and being precautionary in the absence of evidence can both support good decisions. Adaptive management is the continuous evolution of practices based on careful observation. Learn from the past and plan for the future.



#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
		<p>policy, previous policy effectiveness has been assessed and challenges identified prior to policy redevelopment. (This is considered gathering evidence or baseline data to support policy development.)</p> <p>2. The goals that the policy is intended to achieve are clearly articulated, and qualitative or quantitative metrics and timelines are identified to enable</p>				

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
		effectiveness assessment. 3. Capacity for monitoring and adaptively modifying policy built into the policy. 4. Areas where baseline data or outcomes are uncertain are clearly articulated in the policy, and the application of the "Precautionary Principle" is made transparent for public review.				
4	<i>Monitor implementation with clear metrics and</i>	Council leads or sets the example for Saanich. The outcomes that are	Council indicates it wants to lead, but does not.	Council has an opportunity to lead, but does not.	Council fails to lead.  No outcomes or timelines.	Not learning from and repeating past mistakes.

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
	<p><i>commit to continuous improvement and innovation using best practices.</i></p>	<p>to be achieved are clear.</p> <p>Timelines are clear.</p> <p>Staff fully engaged in developing innovative policy proposals.</p> <p>Promotes full interdepartmental coordinated action to achieve outcomes.</p> <p>Specific best practices are listed and committed to.</p>	<p>Outcomes clear but timelines are vague, or vice versa; best practices vague.</p> <p>Staff only partially engaged in developing innovations.</p> <p>Departments and staff only partially coordinate.</p> <p>Policy or program has been done a few times before.</p>	<p>Outcomes and timelines vague.</p> <p>Best practices not specified.</p> <p>Staff not engaged in developing innovations.</p> <p>Poor interdepartmental coordination.</p> <p>Limited commitment to continuous improvement.</p> <p>Policy or program has been done frequently.</p>	<p>Best practices not specified.</p> <p>No staff engagement or interdepartmental coordination.</p> <p>No commitment to continuous improvement.</p> <p>Not an innovation if it's done routinely.</p>	

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
		<p>Clear commitment to continuous improvement</p> <p>First time for this Policy or program.</p>				
5	<p><i>Work actively with neighbouring jurisdictions, organizations, and initiatives to achieve results at a bioregional scale.<sup>6</sup></i></p>	<p>Policy has been discussed with neighbouring jurisdictions and has positive effect and impact<sup>7</sup>, or policy is adapted from other jurisdictions.</p> <p>Policy has positive impact on</p>	<p>Policy may have an impact on other local jurisdiction and at a bioregional scale.</p>	<p>Policy may have impact on local jurisdictions but not at bioregional scale.</p>	<p>Policy has no relation to what adjacent jurisdiction are doing</p>	<p>Policy works against the direction other jurisdictions are going, or negates improvement on a bioregional scale</p>

<sup>6</sup> Essentially, southern Vancouver Island and Gulf Islands.

<sup>7</sup> Neighbouring jurisdictions means local governments that share a border with Saanich, or the CRD

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
		resilience at bioregional scale.				
6	<i>Address climate adaptation and mitigation in decisions.</i>	Meets or exceeds full implementation of provisions of Saanich Climate Plan	Partly addresses adaptation and mitigation in Saanich Climate Plan	Addresses mitigation but not adaptation or vice versa.	Does not address the provisions of the Saanich Climate Plan	Will result in a net increase in GHG emissions
7	<i>Collaborate with people of diverse interests and backgrounds to develop more durable, fair, and effective environmental policies and programs.</i>	Policy developed in collaboration with relevant community organizations, ENGOS, developers, service clubs, advisory committees, school	Consultation and collaboration has taken place with most of the appropriate and relevant groups and people of diverse backgrounds	Consultation and collaboration has taken place with only a few groups or special interests and some of the outcomes are welcoming to	Policy was developed without external consultation or collaboration and no particular effort was made to be welcoming to people	Policy was developed with values and benefits in conflict with, or ignoring all, input provided at the consultation stages

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
		districts, health authorities and special interest groups, etc. and policy outcome is welcoming to people of diverse backgrounds.	affected by the policy.	people of diverse backgrounds.	of diverse backgrounds.	<p>OR</p> <p>Policy was developed solely with special interest groups directly affected by said policy</p> <p>No effort was made to ensure the outcomes were welcoming to people of diverse backgrounds.</p>
8	<i>Ensure open, accurate environmental information to encourage an informed citizenry that</i>	<p>To score on Aspect 1:</p> <p>1. Accurate (vetted and assured by experts) baseline</p>	Policy includes sporadic outreach, education and some dedicated staff support. The outreach may be	Public input not consistently sought, recorded or incorporated. No dedicated staff resources.	Policy developed by Saanich staff and approved by Council without public participation, but some outreach during	Policy developed by Saanich staff and approved by Council without public participation, but no resources for

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
	<p><i>participates in building policies and programs for a more resilient Saanich.</i></p> <p>This principle has two aspects: Aspect 1) making environmental and policy development information (data, maps etc.) available to the public to create an informed citizenry and</p>	<p>environmental data and information on criteria 1, 2 and 3 of Principle 3 above are clearly and openly communicated to the public in public forums and/or through online resources.</p> <p>2. Data gaps and uncertainty is clearly articulated so that criteria 4 of Principle 3 above can be applied.</p> <p>To score on Aspect 2:</p> <p>3. If relevant, input from the community is</p>	<p>only targeted to some segments of the community and not towards harder to reach groups within the community (e.g., just online engagement or resources).</p>		<p>the implementation phase.</p>	<p>communication at any phase of the project.</p>

#	Principle from EPF	Scoring Matrix for policies, strategies, regulations, and incentives. For brevity, "Policy" is used to denote all the initiatives in the table below				
		High (3)	Medium (2)	Low (1)	Neutral (0)	Opposes (negative 1 to 3)
	<p>Aspect 2) soliciting information back from this informed citizenry to inform and improve policy.</p> <p>To score "high" all criteria on both Aspect 1 and 2 need to be met.</p>	<p>solicited, documented, and transparently incorporated into policy and if not incorporated, documentation is available on reasons why.</p> <p>4. Policy includes provisions for dedicated staff and ongoing outreach, education during the implementation phase.</p>				



DRAFT