

The City of Langford Official Community Plan (OCP) outlines a commitment to taking action on climate change, including planning liveable, sustainable communities, and encouraging green developments (Bylaw 1200, section 2.0). To this end, when considering development applications regarding environmentally sensitive areas (ESA), Council requires that all supporting information is thorough and accurate in order that development is well managed and that rare, endangered, or sensitive ecosystems, plants and animals are protected (Bylaw 1201, Section 5.2)

The property at 960 Worrall and 804 Latoria is considered an ESA (Bylaw 1200, Map 3). In accordance with ESA guidelines outlined in Bylaw 1202, an Environmental Impact Assessment was submitted by the developer in support of their application for rezoning, however we believe this assessment provides insufficient information for Council to make a decision on zoning at this time.

The assessment has been independently reviewed by Joanna Preston (registered professional wildlife biologist and local resident) and Ben van Drimmelen (retired registered professional wildlife biologist, habitat biologist and natural resources lawyer), both of whom concluded that the assessment does not address vital aspects of the environment on the parcel, is misleading, and lacks appropriate mitigation measures. The major points of their review are highlighted below:

### **Misleading Information & Methodology**

- The report focuses heavily on observations from the 3 day site visit in early August, which is a poor time of year, and no actual surveys (wildlife or plants) were completed. Therefore it's not surprising that very few species and nests were found.
- The intent of a site assessment should be to assess habitat suitability rather than to confirm species presence; the report uses direct observations as primary data, where it should be supplemental.
- The lizards observed and identified in the report as western skink are likely misidentified as this species is only found in south-central BC
- The entire development is within the Coastal Douglas Fir (CDF) ecosystem, but the report fails to recognize its rarity. The CDF ecosystem makes up only 0.3% of BC land area. 80% of the global range occurs right here in the southern Strait of Georgia area and only 9%, 23,500 hectares, is government owned. The 91% that is on private land is already mostly developed. Thus, the remaining undeveloped parcels of the CDF ecosystem have a very high priority for preservation, provincially, nationally and even globally. (cdfp.ca)

## Missing Vital Elements of a Site Assessment

- Missing habitat assessments for *each* species at risk that are likely to occur. The only species for which there is a habitat assessment in the report is the Northern Red Legged Frog, however no habitat assessments were made for the endangered Sharp-Tailed Snake or any other species at risk that are likely to occur here: a potential of 91 species according to the report.
- Missing assessment of wildlife habitat connectivity and relative importance of the site in context of the region for wildlife movement and maintaining wildlife diversity.
- Missing review and assessment of important wildlife features: potential bat roost sites, wildlife trees, raptor nests, garter snake hibernacula, wildlife trails.
- No assessment of effect on adjacent habitat and the site visit information did not extend into the adjacent area (buffer) to identify potential features and habitat that could be affected.
- No assessment on the cumulative loss of forest cover in the region and the contribution to this from the proposed development.
- No criteria or definition of what constitutes a “*significant impact*” in relation to riparian areas and species-at-risk habitat on the parcel.

## Inadequate Mitigation Measures

- The report proposes to mitigate habitat loss to the endangered sharp-tailed snake by capturing and translocating individual snake specimens. Translocation is not considered a mitigation measure for habitat loss. Furthermore, translocation of reptiles under these types of circumstances has long been considered to be unsuccessful (Germano & Bishop, 2009)
- The red-legged frog, a species of special concern, was found during the site visit. The report states that their habitat will be protected, however it does not provide any mitigation measures needed for the significant threats this project will cause:
  - reduction in frog dispersal due to habitat fragmentation,
  - mortality from vehicle collisions,
  - population isolation,
  - habitat degradation from alteration to riparian areas,
  - risk of predation by introduced bullfrogs, which will rapidly colonize the permanent stormwater retention pond that is proposed; and

- Direct mortality or sub-lethal impacts from fertilizer and pesticide applications in the subdivision