



208A – 2520 Bowen Road
Nanaimo, BC V9T 3L3
P: (250) 751-9070 • F: (250) 751-9068

April 19, 2022

EDI Project No: 21N0011

GNB Builders Inc.
13100 Magdalena Drive
Ladysmith, B.C. V9G 2B8

Attention: Greg Bianchini

**RE: Environmental review for planned development at 12453 Rocky Creek Road,
Ladysmith, BC**

EDI Environmental Dynamics Inc. (EDI) has been retained by GNB Builders Inc. (GNB) to conduct a preliminary environmental review and to provide advice regarding planned residential development adjacent to the sea at Ladysmith Harbour. The review is warranted as planned development includes construction of a new house within 15 m of the sea. Under the Cowichan Valley Regional District's (CVRD's) zoning bylaw, the setback for construction of a habitable building is 15 m from the sea. As such, a variance will be required for planned construction. I reviewed the site with GNB on January 6, 2021. Provided below is a summary of environmental recommendations and considerations associated with planned development within the 15 m setback.

PLANNED DEVELOPMENT

Planned development of the subject property is shown on the attached sketch plan and includes demolition of an existing, dilapidated house and construction of new waterfront home. The foundation of the existing house may be left in place, partially removed, or fully removed depending on how much disturbance this may cause to soils and adjacent tree roots. This will be determined during the demolition process. Planned development occurs within the existing cleared, disturbed areas at and near the existing house, yard and driveway. The developable area of the property is relatively small and constrained. While there are limited options to locate the new home further back from the sea, the planned location is suitable in that it is already cleared and is located back from large trees within the marine riparian area. In addition to development associated with house demolition and construction, it is currently anticipated that the following ancillary developments will occur within the 15 m setback:

- Removal of some invasive plant species.
- Landscaping (with a focus on native plant species).



SITE PHOTOS

The following photos describe existing conditions at the site.

<p>Looking southeast at building site (foreground) and existing house.</p>	<p>Looking northwest at existing house from the southeast corner of the property.</p>
<p>Looking southeast at existing house adjacent to the top of bank.</p>	<p>Looking southeast at marine riparian area and stormwater outfall that is near the north tip of the lot.</p>

RECOMMENDATIONS

The following list of recommendations has been provided to minimize potential adverse environmental impacts, promote best practices, and address regulatory requirements.

- Retain an ISA certified arborist to assist with preventing harm to any trees within the 15 m setback that are stable and safe, and to identify whether any trees are unsafe and require removal. The trees and vegetation along and below the bank are ecologically important as they are within the marine riparian area, and they are also important in terms of bank and shoreline stability.
- Any coniferous trees that are deemed hazardous (several large Douglas fir trees occur along the bank) shall be treated in the least harmful manner (limbing and topping is preferred over removal). Replace any trees that are removed.



- Retain a Qualified Environmental Professional (QEP) to prepare an Environmental Management Plan (EMP) that addresses all aspects of planned development (demolition, house construction, tree/vegetation removal and landscaping).
- Retain a Qualified Environmental Professional (QEP) to prepare a Vegetation Management Plan (VMP) within the 15 m setback to address any planned invasive species removal, landscaping and tree replacement.

CONCLUSION

Provided the above recommendations are followed, the proposed development is unlikely to result in significant, adverse environmental impacts at the subject property.

STATEMENT OF LIMITATIONS

This report was prepared exclusively for GNB and the owner(s) of 12453 Rocky Creek Road by EDI Environmental Dynamics Inc. The quality of information, conclusions and estimates contained therein are consistent with the level of effort expended and is based on: i) information available at the time of preparation; ii) data collected by EDI Environmental Dynamics Inc. and/or supplied by outside sources; and iii) the assumptions, conditions and qualifications set forth in the report. The report is intended to be used by GNB and the owner(s) of 12453 Rocky Creek Road for the intended purpose as outlined by this report (RDN review and issuance of a DP). Any other use or reliance on this report by any third party is at that party's sole risk.

The recommendations made in this report are not meant to satisfy any potential slope stability, flood hazard, or contaminated site considerations as these aspects are not within our expertise. It is noted that predicted sea level rise is a consideration for all new and existing developments near the ocean. While we are not experts on the matter, an important consideration with gradual sea level rise would be ensuring bank stability such that wave action during high tide and/or storm surge events does not result in erosion of the toe of slope at the Property. Ensuring the bank and riparian area remain well vegetated with trees and shrubs over the long-term is an important preventative measure that can prevent the need for expensive, engineered solutions to bank erosion, which can be detrimental to the sensitive beach, intertidal and marine riparian ecosystems.

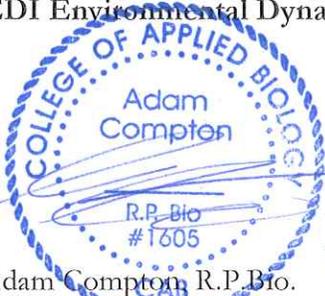
Any material changes to either site conditions or the proposed activities as described in the report may invalidate the conclusions and recommendations made. The undersigned should be contacted if the development plans change to determine if the report needs to be revised or updated.



Please let me know if you have any questions or comments regarding this letter.

Yours truly,

EDI Environmental Dynamics Inc.



*Original signed
+ sealed Apr. 19/22*

Adam Compton R.P.Bio.
Senior Biologist/Project Manager

Attachments:

- Sketch Plan

