



ATTACHMENT G LETTER OF SUPPORT FROM N.A.L.T

Our Mission: to support, promote and protect the natural values of land and water in our area.

September 6th, 2023

To: Payton Carter, Planner
City of Nanaimo

Re: DP001308 – 855/853 Douglas Ave

Dear Payton Carter,

This message is addressed to you as City of Nanaimo staff contact for Development Permit Application DP001308.

From personal discussions with the proponent, and with the receipt of a copy of the Letter of Rationale for the development permit, I am satisfied that the landowner understands the requirements of the bylaw (*Zoning Bylaw 4500. Part 18.1.4*). I accept that the restoration and enhancement plan referred to in the revised Environmental Assessment Report by the Qualified Environmental Professional and further detailed in the Letter of Rationale is a sincere effort to meet the requirements of the bylaw.

In July of 2022, City council unanimously adopted the current development permit guidelines. The major change in the bylaw was the shift from the *no net loss* principle of the previous version to the principle of *net gain*. This is a significant change. No net loss cemented habitat loss brought about by previous actions on the land. Net gain, as expressed in the bylaw, seeks to restore that lost habitat.

Excerpts from *Zoning Bylaw 4500. Part 18.1.4*

Part 18.1.4

Where disturbance within an ESA or ESA leave strip cannot be avoided, the following information must be provided... in order to ensure protection, connectivity and increased functional habitat through mitigation, compensation and restoration of the ESA.

f) a restoration and enhancement... plan. The plan shall meet the following criteria

1) Include restoration and enhancement of ESAs that were impacted by previous development activities.

g) the principle of net gain will be followed, and... must demonstrate how an increase in the quality and quantity of functional habitat within the... ESA leave strip will be achieved,... such that any areas restored will be of better ecological value, and shall be contiguous with the original... ESA leave strip. The following principles apply to establishing net gain:

1) Outcomes through habitat creation, enhancement, and/or restoration;

2) Target conditions (functional habitat in 20 years); and

3) Target metric (twice the area of encroachment into the leave strip).

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Our Mission: to support, promote and protect the natural values of land and water in our area.

The Letter of Rationale outlines a plan to achieve the principle of net gain at twice the area of the disturbance within the riparian leave strip, exclusive of the area previously occupied by a shed (as per Zoning Bylaw 4500. Part 18.1.6.e). When completed, this restoration and enhancement plan will be compliant with the bylaw.

I applaud the City of Nanaimo for creating a pathway to achieve net gain in housing and net gain in habitat.

I look forward to the principle of net gain of functional habitat being applied to other development permit applications in our community.

Sincerely,

Paul Chapman
Executive Director
Nanaimo & Area Land Trust



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