

ADMINISTRATIVE REPORT



TO: Planning and Development Committee

FROM: B. Newell, Chief Administrative Officer

DATE: May 23, 2019

RE: Environmentally Sensitive Development Permit (ESDP) Area
24 Month Review – Proposed OCP Bylaw & Development Procedure Bylaw Amendments

Administrative Recommendation:

THAT the Environmentally Sensitive Development Permit (ESDP) Area designations in the Okanagan Electoral Area Official Community Plan Bylaws be amended;

AND THAT the Development Procedures Bylaw No. 2500, 2011, be amended in order to update the requirements related to ESDPs.

Purpose:

The purpose of this report is to provide the Board with an overview of the Environmentally Sensitive Development Area (ESDP) as it has been operating following the adoption of new guidelines, mapping and processing procedures in June of 2017.

In addition, Administration is proposing a number of amendments to the ESDP Area designation to address issues identified with the new permitting process.

Background:

At its meeting of April 1, 2010, the Board adopted the South Okanagan Sub-Regional Growth Strategy Bylaw No. 2421, 2007, which included, amongst other things, a recommendation to:

Support the development of an inter-regional Biodiversity Conservation Strategy by collaborating with ecosystems experts, including those with traditional ecological knowledge, and balance ecosystems interests with economic and social sustainability.

At its meeting of September 5, 2013, the Planning and Development (P&D) Committee of the Board resolved to “accept *Keeping Nature in Our Future: A Biodiversity Conservation Strategy for the South Okanagan-Similkameen* as a guiding document for the Regional District of Okanagan-Similkameen and the amendment of Official Community Plans.”

A key policy direction included within this Strategy was to “Establish new, or update existing land use policies and regulations to ensure that development processes integrate biodiversity conservation considerations” (Strategic Direction 1.1).

Based upon this direction, Administration undertook a review of the ESDP Area designations in the Okanagan Electoral Area OCP Bylaws between 2014 and 2017. This involved the following updates:

- mapped areas (using mapping contained in *Keeping Nature in Our Future*);
 - OCP policies which support the designation of ESDP Areas;
 - ESDP Area Guidelines; and
 - application requirements and processing procedures.
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At its meeting of June 15, 2017, the Board adopted Amendment Bylaw 2710, 2017, which incorporated the ESDP Area updates summarized above into the Okanagan Electoral Area OCP Bylaws.

At that time, Administration committed to bring forward a review of the new ESDP Area designation and how it was operating within 12 months (i.e. by June 15, 2018). Due, however, to un-foreseen work volumes and available staff resources in 2018, this review was delayed.

On November 15, 2018, and in anticipation of this review, a Workshop with RDOS staff, Provincial government staff, SOSCP Program Manager and Environmental Planner, and area Qualified Environmental Professionals (QEPs). Items discussed at this meeting included feedback on the ESDP process, possible revisions and the overall efficacy of Rapid Environmental Assessments.

Analysis:

Based upon the consultation undertaken with local QEPs and provincial staff involved in environmental management in late 2018, it is Administration’s understanding that the current ESDP process is helping inform development and reducing impacts to sensitive ecosystems and species at risk.

QEPs have also advised that they believe the new ESDP guidelines to be useful and better than the past approach (i.e. exempting all residential development at the building permit stage).

While enforcement and compliance with development permit provisions continues to be an issue, regulating residential development is seen to further the objectives and policies endorsed by the Regional District Board in its various land use bylaws as well as in its Vision statement:

We envision the Regional District of Okanagan-Similkameen as a steward of our environment, sustaining a diverse and livable region that offers a high quality of life through good governance.

The ESDP Area designation also assists the Regional District with the protection of Critical Habitat consistent with the requirements of the federal *Species at Risk Act* (i.e. protecting migratory bird habitat), which is over-riding federal legislation that local governments are expected to uphold to.

Finally, the ESDP Area designation is seen to be ensuring that good environmental information is being considered as part of the development planning process.

That said, and after 2 years of working with the current ESDP Area guidelines and processing procedures, Administration believes that there a number of improvements that can be made. These are outlined below along with some basic statistics regarding recent permit issuance:

Permitting Statistics:

Prior to 2017, the average number of ESDP’s issued by the Regional District in a year was 1-2 total, which increased to approximately 30+ per year after 2017 following the removal of the building permit exemption for all types of residential development:

	Area “A”	Area “C”	Area “D”	Area “E”	Area “F”	Area “I”	Total
2017	3	2	9	1	0	[N/A]	15*
2018	10	7	17	2	2	1	39
2019	5	1	1	2	3	1	13†

Total	18	10	27	5	5	2	67
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* ESDP's issued from June 15th to December 31st of 2017

† ESDP's received from January 1st to May 15th of 2019

Of the 26 ESDP's issued between 1997 and 2017, a majority were issued for subdivisions with the remainder being related to non-residential development (i.e. motel, campground, tennis court and water reservoir).

After June 15, 2017, 76.1% issued ESDP's have been for single detached dwellings or related residential structures (i.e. garages) with the remainder related to subdivisions (16.4%) and other non-residential development (7.5%).

Of the ESDP's issued since 2017, 86.6% have been actioned under the Expedited ESDP option through the submission of a "Rapid Environmental Assessment" (REA) by qualified environmental professionals (NOTE: this option did not exist prior to 2017).

For reference purposes, an overview of all ESDPs issued since June 15, 2017, is provided in Attachment No. 1.

Checklist vs. Template:

The option of a "Rapid Environmental Assessment" (REA) for residential buildings and structures was introduced in 2017 as a way to provide a cost-effective alternative to traditional "Environmental Impact Assessments" (EIA) in light of the proposed removal of the building permit exemption for residential development.

The REA is premised on the completion of a checklist by a QEP that is primarily concerned with the identification of "environmentally valuable resources" (EVRs) within 100 metres of an area proposed for residential development.

If no EVRs are identified by a QEP, the Regional District issues an ESDP in much the same way it issues "Expedited" Watercourse Development Permits (WDPs) for development in riparian areas. If, however, a QEP identifies EVRs and is unable to mitigate the impact of the proposed residential development, an EIA would be required prior to the issuance of an ESDP.

Administration did not anticipate in 2017 that the REA option would become the principal form in which QEP's submit ESDP's to the Regional District, and is further concerned the REA option is being mis-used by QEP's to facilitate complex subdivisions and developments that the checklist was not designed to address.

There also appears to be confusion amongst QEP's as to the level of information required to support a REA with reports ranging in size from 2 pages to 40 pages with length seemingly unrelated to the complexity of a development.

To address this, Administration considers there to be merit in replacing the current REA checklist with a standardised report template that will specify key issues to be addressed and reporting requirements to be met by QEP's. The benefits of this revision would be:

- streamline development permit review, by ensuring that required information is presented more efficiently;
- clarification about what residential development thresholds/circumstances would result in the need for a full environmental impact assessment (EIA), instead of an expedited review;

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- clarification of timing restrictions that may impact an environmental assessment (including REAs) to help property owners understand that these assessments cannot be completed when significant snow is on the ground, or when other timing requirements may be imposed (e.g. where inventory is needed);
 - creating consistency in the quality and effectiveness of assessments being submitted by QEP's in support of development permits; and
 - improving the information provided by QEPs regarding monitoring and evaluation conditions to be used in development permits.

Subdivisions:

The subdivision of land is considered a complex form of development that is not suited for assessment through a REA.

This is due to the requirement that an environmental assessment not only consider the proposed layout of parcels and road dedication (including the placement of utilities and storm water management), but also confirm that within each proposed parcel exists a suitable building envelope capable of accommodation residential development (i.e. dwelling, driveway & septic system), and that such development be able to occur without the need for additional ESDPs.

For this reason, it is being proposed to exclude subdivisions as a form of development that can be submitted as an Expedited ESDP.

REA Title:

QEP's have expressed concern regarding use of the name Rapid Environmental Assessments to described the checklist and the expectation it creates amongst property owners that an assessment of their property can be completed in a quick manner (i.e. "rapid").

According to QEPs, this is leading property owners to provide insufficient time between the preparation of a building permit application and the obtaining of an environmental assessment.

To address this, QEPs have requested that the "Rapid Environmental Assessment" name be replaced. In response, and reflecting the other changes outlined above, Administration is proposing that the new report template be referred to as the "Environmental Screening Report".

Mapping Corrections:

In incorporating the mapping from *Keeping Nature in Our Future*, parcels zoned low, medium and high density residential were excluded from the ESDP Area as were parcels in the Agricultural Land Reserve (ALR) or Crown land – unless significant topographical features existed on a site.

Similarly, where a developed footprint could be identified on a parcel this area was excluded from an ESDP Area. Due to the volume of properties being reviewed, oversights occurred where an existing developed area was inadvertently retained within the ESDP Area (see Attachment No. 2).

Administration has identified a number of such properties since 2017 and is proposing to update the mapping to address these by excluding the developed footprint.

Public Representation (Electoral Area "A"):

While Administration has not yet sought public input regarding the operation of the ESDP Area over the previous two years, a representation from a property owner at Anarchist Mountain in Electoral Area "A" has been received and is included in Attachment No. 3.

In summary, this representation is advocating for the removal of the ESDP Area and the implementation of a voluntary approach to environmental protection by individual property owners with educational support provided by the Regional District.

While Administration is concerned that such an approach would be less effective than the current model of utilising ESDPs for retaining biodiversity values, it does raise a question of the extent to which the ESDP Area should be applied. As a suggestion, the Board may wish to consider if parcels less than 2.0 ha in area should be excluded from the ESDP Area designation if these properties have been previously developed (as is the case for the Anarchist Mountain community).

Alternatives:

- .1 THAT the Environmentally Sensitive Development Permit (ESDP) Area guidelines, mapping and development procedures in the Okanagan Electoral Area Official Community Plan Bylaws not be amended; or
- .2 THAT consideration of amending the Environmentally Sensitive Development Permit (ESDP) Area guidelines, mapping and development procedures in the Okanagan Electoral Area Official Community Plan Bylaws be deferred.

Respectfully submitted:



C. Garrish, Planning Manager

Endorsed by:



B. Dollevoet, General Manager of Development Services

Attachments: No. 1 — ESDP's submitted to RDOS since June 15, 2017

No. 2 — Representative Example of Proposed Mapping Correction

No. 3 — Public representation — (March 8, 2019)

Attachment No. 1 — ESDP's submitted to RDOS since June 15, 2017

No.	Permit No.	Applicant	Type	Development
2017				
.1	D2017.116-ESDP	Dyck	Expedited	New dwelling
.2	D2017.125-ESDP	Pyrozyk	Expedited	New dwelling
.3	A2017.127-ESDP	Strouts & Miller	Expedited	New accessory structure
.4	E2017.131-ESDP	Cleveland	Regular	New dwelling
.5	D2017.132-ESDP	Hoeger	Expedited	New dwelling
.6	D2017.136-ESDP	Briscoe	Expedited	New dwelling
.7	D2017.137-ESDP	Jacques	Expedited	New dwelling
.8	D2017.146-ESDP	Burke	Expedited	New Dwelling
.9	A2017.149-ESDP	Visser	Expedited	New Dwelling & Workshop
.10	D2017.153-ESDP	Gratton	Expedited	New well and pipe to dwelling
.11	D2017.158-ESDP	Schmidt	Expedited	New roof over shipping containers
.12	D2017.162-ESDP	McClelland	Expedited	New workshop
.13	C2017.167-ESDP	Vaillancourt	Expedited	New dwelling & septic
.14	C2017.171.ESDP	Lindsay	Expedited	Subdivision (2-lot)
.15	A2017.178-ESDP	Quintal	Expedited	Subdivision (1-lot)
2018				
.1	D2018.008-ESDP	Balla & Paul	Expedited	New dwelling
.2	D2018.016-ESDP	Marti	Expedited	Subdivision (3-lot)
.3	D2018.018-ESDP	Thew	Expedited	New Dwelling
.4	C2018.019-ESDP	Chamberland	Expedited	New Dwelling
.5	D2018.025-ESDP	Kenyon & Hitchcock	Expedited	New dwelling
.6	E2018.034-ESDP	Mathias & Born	Expedited	New dwelling, shed & septic
.7	D2018.037-ESDP	Schmidt	Expedited	New dwelling & garage
.8	D2018.043-ESDP	OK Falls RV Resort	Regular	Residential development
.9	D2018.046-ESDP	Kwakernaak/Wood	Expedited	New dwelling
.10	C2018.055-ESDP	T262 Enterprises	Expedited	Subdivision (31-lot)
.11	A2018.056-ESDP	Blomme	Expedited	New dwelling & garage
.12	D2018.067-ESDP	Mide	Expedited	Subdivision (1-lot)
.13	D2018.068-ESDP	Regina & Chidley	Expedited	New dwelling
.14	F2018.073-ESDP	Vaisanen	Regular	Subdivision (1-lot)

.15	F2018.077-ESDP	Dolan	Expedited	New dwelling & septic
.16	D2018.087-ESDP	Kildaw	Regular	Subdivision (2-lot)
.17	D2018.096-ESDP	Pardell	Regular	New dwelling
.18	A2018.097-ESDP	Teichroew	Expedited	New garage
.19	D2018.101-ESDP	Cesla	Expedited	New dwelling, driveway & septic
.20	E2018.107-ESDP	Schroeder	Regular	New dwelling, garage and garden
.21	D2018.112-ESDP	Elkjar	Expedited	New garage
.22	A2018.117-ESDP	De Goede Newfield	Expedited	New dwelling, garage, pool & septic
.23	C2018.122-ESDP	Marsel	Expedited	New dwelling & driveway
.24	D2018.131-ESDP	Baker	Expedited	New dwelling
.25	A2018.134-ESDP	Larose Winery	Regular	New winery
.26	C2018.136-ESDP	Warren	Expedited	New dwelling, workshop, etc.
.27	C2018.139-ESDP	Oliveira	Expedited	Subdivision (2-lot)
.28	A2018.145-ESDP	Kappel	Expedited	New dwelling & workshop
.29	C2018.151-ESDP	Cotter	Expedited	New accessory structure and septic
.30	A2018.152-ESDP	Trueman	Expedited	New dwelling
.31	A2018.154-ESDP	Gagnon	Expedited	New dwelling
.32	D2018.155-ESDP	Twin Lakes Golf Course	Expedited	Garlic Farm
.33	D2018.157-ESDP	Kribernegg	Expedited	New dwelling & septic field
.34	D2018.167-ESDP	Russell	Expedited	New dwelling
.35	C2018.173-ESDP	Oldfield	Expedited	New dwelling
.36	D2018.176-ESDP	Plensky & Palmer	Expedited	New dwelling
.37	A2018.200-ESDP	Osoyoos Mt. Estate	Regular	Subdivision (1-lot)
.38	I2018.201-ESDP	Zenger	Expedited	New dwelling
.39	A2018.206-ESDP	Premerl & Velghe	Expedited	New dwelling
2019				
1.	A2019.001-ESDP	Kramer	Expedited	New dwelling, driveway & septic
2.	E2019.002-ESDP	Noble	Expedited	New pool
3.	I2019.003-ESDP	Thomson & Sanche	Expedited	New dwelling
4.	C2019.004-ESDP	UBC	Expedited	Demolition & New Buildings
5.	A2019.005-ESDP	424940 BC Ltd.	Expedited	New dwelling & accessory building
6.	D2019.006-ESDP	London	Expedited	New dwelling, garage & acc. dwelling
7.	E2019.007-ESDP	Grace Estates	Expedited	Subdivision (11-lot)
8.	A2019.008-ESDP	Walker	Expedited	New dwelling, shed and septic
9.	A2019.009-ESDP	Hinz & Clark	Expedited	New garage

10.	I2019.010-ESDP	Gibney	Regular	Quonset & wells
11.	A2019.011-ESDP	Pendergraft	Expedited	Subdivision (boundary adjustment)
12.	F2019.012-ESDP	Matheson	Expedited	New dwelling
13.	I2019.013-ESDP	Mielke	Expedited	New dwelling

Attachment No. 2 — Representative Example of Proposed Mapping Correction



Attachment No. 3 – Public Representation

My name is Bernie Langlois. My wife Eileen and I purchased lot 1 (3.5 acres) on Bullmoose Trail extension in 2012 and started building our retirement home and developing the property. At the time there was no restrictions, directives, charges or caveats on title (other than Fortis right of ways) as to what we could, or could not do with our property. As we continue to develop the property we have since been informed that this property is now in an environmentally sensitive area and comes with numerous restrictions.

I have read the document “Keeping Nature in our Future” that was adopted as the basis for the RDOS strategic biodiversity policies and the Official Community Plan (OCP). Some of the Key findings in this scientific study are:

1. “More than 20% of the study area is classified as having high or very high relative biodiversity i.e., the region has many healthy natural areas supporting a diversity of wildlife
2. The electoral areas and municipalities with the greatest proportion of very high and high relative biodiversity are Area A (Rural Osoyoos), Area B (Cawston), Area C (Rural Oliver), Area D (Okanagan Falls), and the municipalities of Osoyoos and Oliver.
3. The valley bottom is very important, even though it is a smaller part of the region. Nearly half of the very high and high biodiversity values occur in the valley bottom. The results show that a significant amount of habitat in the valley has already been lost, as reflected by the high proportion of low and very low relative biodiversity found there
4. Since upland areas do not have the same intensity of land conversion as the valleys they represent an opportunity for land managers to retain biodiversity values, although protection of these lands is not comparable or interchangeable with protection of valley bottoms.”

I fully agree that the unique properties of the Okanagan valley and more specifically the northern part of the Sonora Desert must be preserved because of the specific flora and fauna that a desert environment brings. However as stated, the desert in the valley bottom has already been destroyed through development and agriculture.

My major concern and objection is to the plan that was adopted to protect the environment, specifically to our area. It is flawed for the following reasons:

1. The plan targets and focuses on only selective areas and individuals.
 - a. When one looks at the RDOS map that has been designated as environmentally sensitive (red zoned) it is only a small fraction of the entire regional district. The most sensitive areas (the desert areas) are not red zoned. Area B which is a very high to high in biodiversity is not deemed an environmentally sensitive area.
 - b. The largest red zone on the whole map is a big square at the southeast corner of Area A which includes the Regal Ridge development. The whole area is being treated

equally despite the fact that there are several different eco systems and topography within the area. Low risk area is being treated the same as high risk. Anarchist Mountain is not the Sonoran Desert and as such has different biodiversity values.

- c. RDOS was well intentioned to preserve the biodiversity in the Okanagan but designed a plan that puts all the accountability on the individuals while collecting permit fees for RDOS and creating a healthy source of income for QEP/biologists. How is RDOS accountable and how does the environment benefit from this plan. Who is monitoring and measuring and who gets the accolades?

2. Implementation Plan less than adequate

- a. When the plan was about to become policy, a series of town halls were scheduled. The town hall meeting planned for Area A was set up outside of Area A, one week before Christmas between 5:00PM and 7:00PM (when many residents were away for Christmas, and the time of Dinner hour) This was great timing to not garner good attendance.
- b. We know from the experience in the valley that degradation from human activity is real and detrimental to biodiversity values. Although the plan isn't meant to discourage development and growth, it must contain elements to protect the environment. If this was adopted by RDOS in 2005, why was Regal Ridge allowed to develop as it did without designation on title that this area was environmentally sensitive. Our lot had not even been developed then and even when it was, there were no caveat or descriptors associated with or declared on title.
- c. The method used for ESDP mapping in Regal Ridge was to exclude already disturbed areas based on an interpretation of available aerial photos. In our case there was already a trailer on the western edge of the lot that was not excluded. There was no checking in person on any of these lots. I also find in looking at the whole area that there are inconsistencies to the mapping interpretation. Huge areas are excluded with no evident land disturbance.
- d. We have 2 Fortis right-of-ways on our property. We understand that Fortis can access those right of ways and scrape, dig and basically change the landscape without regard to the flora or fauna and without permission or an ESDP from RDOS. Conversely as the land owner, I am not allowed to do any of these activities without great costs and permission from RDOS. Either the environment is sensitive for all these activities or it isn't.
- e. The current plan for ESDP is to have land/lot owners pay a QEP/biologist (\$1,500 to \$2,000) to do an assessment and provide a report to both RDOS and the lot owner as to the environmental values of the stated development area and mitigative measures to offset any impact the development might have to the environment. This report comes

in the form of recommendations and is not followed up by RDOS nor are the corrective measures enforced (ie Has there been 2 trees planted for every tree that is cut)? This plan also does not address the following:

- i. If no environmental values are impacted, are the QEP fees refunded by RDOS or the QEP?
- ii. If there is major environmental impact such as the private development otherwise known as, “the scar on the mountain” just above Osoyoos and Hwy #3, is the development not approved or stopped?
- iii. The triggers for an ESDP as per Section 18.2.5 of the OCP bylaw are 1) subdivision development, 2) construction, 3) the “alteration of land, including grading, removal of vegetation, deposit or moving of soil, paving, installation of drainage or underground services”. For all practical purposes subdivision development obviously would trigger an ESDP as would many building permits but certainly not all outbuildings. Least of all RDOS would not be apprised by individual lot owners for any of the activities in section 3. In fact Fire Smarting activity exclusions within 10 meters of a building contravenes the recommended guidelines for interface fire hazard mitigation. Anarchist Mountain (mostly Regal Ridge residents) have had Firesmart Recognition status for the past 6 years and were one of the first communities in BC to be recognized. This is because we, as a community and individual land owners care about the environment and the destruction to flora and fauna that a major fire would create, therefore we have raked, scraped the ground and picked up dead brush beyond the 10 meters of our buildings and in common areas. Where is the consistency and how effective is the plan to the overall strategy. What does an individual ESDP for Bernie Langlois or the general “John Smith” do for preserving biodiversity in the Okanagan Valley?
- iv. What about the deforestation and clear cutting of trees adjacent to the Environmentally Sensitive area? How does that interface with this program?
- v. One of the purposes of this program is to protect and encourage growth in all wildlife by protecting their habitat, food and water sources. What good is that if hunters are allowed to come and destroy both animals and habitat within or in close proximity to this environmentally sensitive area?

3. Accountability

- a. AS mentioned the accountability from this plan rests solely on those individuals who are coerced (with a threat of not getting a building permit) into getting an ESDP and hopefully they abide or adopt the recommendations in the report. All others in the community know nothing or very little about conservation other than their own

intuitive methods. How does this meet the objectives of “Keeping Nature in our Future”

- b. Not complying with the ESDP process results in an enforcement procedure that includes putting a notice on title of a non-permitted building on the property. No one is against getting a building permit . It is the ESDP that is questionable and onerous. Many residents are avoiding the whole building permit process for outbuildings because of ESDP. Enforcement is inconsistent by RDOS and unfairly tasked RDOS inspectors.
- c. The plan is erroneous, unfairly burdens land owners financially and is punitive in its’ approach as opposed to collaborative. RDOS are not a fully vested partner in the process but only the body that makes the rules and to get recognition from senior biodiversity groups and provincial government.

What is the alternative

The “Keeping Nature in our Future” document provides numerous directives, strategies and recommendations as follows:

Page 6 . Strategic Directions for Senior Government

2) Improve implementation of conservation initiatives; promote interagency cooperation, and enforcement of senior legislation, regulations and standards.

3) Manage ecological values on provincial and federal crown lands in a manner that leads by example.

4) Improve the efficiency and effectiveness of environmental mitigation and compensation programs.

6) Support land owners, managers and other stakeholders to conserve biodiversity with financial and technical assistance.

Page 54. Examples of Incentives for Landowners and Developers

- Providing resources to help landowners and developers understand the financial benefits of ecological development approaches
- Exempting eligible riparian property from property taxes if a property is subject to a conservation covenant registered under section 219 of the Land Title Act
- Reducing fees for applications that meet certain environmental criteria
- Providing free technical assistance and recognition for land conservation.

Page 71. Regional Growth Strategy Support for the Biodiversity Conservation Strategy

- 1) Meet with environment partners to develop a regional approach to biodiversity conservation and work with the RDOS Board toward coordinated biodiversity conservation and ecosystems protection.

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- 2) Support the development of an inter-regional Biodiversity Conservation Strategy by collaborating with ecosystems experts, including those with traditional ecological knowledge, and balance ecosystems interests with economic and social sustainability.
 - 4) Monitor the effectiveness of Regional Growth Strategy ecosystems actions, including annual indicators for key ecosystems measures.

These are only some of the suggestions, directives and strategies that I do not see within the current plan.

Suggestions

- Scrapping the current ESPD system including redoing the red zoning maps to exclude private property and focus on community initiatives described below.
- A collaborative approach where all stakeholders prepare the strategies for a particular area/municipality/community/ neighborhood and share in the executive actions and reap the rewards would be much more effective than the punitive approach on individual land owners. The stakeholders would be RDOS, ecosystem experts, community leads and other interested and committed individuals.
- An approach similar to the FireSmart program where objectives for achieving status are outlined to the community. Experts are brought in to explain criteria and what needs to be done. Every year the same and new objectives are added in order to achieve status and maintain designation.
- A number of rewards and incentives could be designed and offered to communities or neighborhoods that achieve proposed biodiversity objectives including public recognition in the form of plaques/signs/announcements, tax deductions for ESDP for every individual in the community, grants for environmental projects for the following year, etc...
- It is critical that a system of monitoring and measurement be established to provide a baseline and gauge on-going progress.