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Tuesday, April 25, 2023

City of Campbell River
301 St. Ann's Rd.
Campbell River, BC V9W 4C7

Statement of Intent for the *Nunns road apartments*

Nunns road apartments are a unique residential development in the ocean side neighboured of willow point in Campbell River BC.

There are two building situated on the property. Each building consist of 10, 2 bedroom 2 baths units stacked on top on one another. Integrated parking has been provided via a timber clad carport. These units are Bright, open, modern, and allow for natural cross-ventilation. Each unit has access to a deck or ground floor patio. This is a much needed affordable offering for first time buyers.

The architectural style of the proposed contemporary development consists of; a mix of traditional asphalt roof and shed roof design that breaks the facade from the street, Modern vertical board and batten, horizontal lap siding, and the use of wood elements around openings.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maris MacDonald'.

Maris MacDonald, Architect AIBC
MacDonald Hagarty Architects Ltd



MEMORANDUM

To: Evan Larkam, Northland Developments Ltd.

From: Mac Easton, RBTech and Monica Stewardson, RPBio. CPESC

Subject: 1940 Nunns Road ESA Update

Date: April 13, 2023

CC:

A follow up assessment of 1940 Nunns Road was completed on March 8, 2023, to confirm the status of any Environmentally Sensitive Areas (ESAs) on the property prior to the submission of a development permit application for new development. This letter supplements a previous assessment letter dated November 10, 2021, as well as the original assessment letter dated July 3, 2018 and the Environmental Monitoring Report dated September 11, 2020.

A search of online resources for any updates relating to ESAs on the site was conducted as part of the assessment. Review of the Sustainable Official Community Plan (SOCP) mapping from the City of Campbell River (CCR) website showed a ditch running through the property. Environmental Development Permit Areas (EDPA) are associated with portions of the ditch that overlap the east side of the property¹ (Figure 1). Any proposed development within 30 m of this ditch would trigger an EDP process with the City of Campbell River.

A search of the BC Conservation Data Centre (CDC) showed no rare or sensitive species accounts that overlapped the property. No Bald Eagle nests or Great Blue Heron colonies were mapped within 300 m of the subject property^{2,3}. No other ESAs were identified on or around the property from online resources.

All buildings on the lot were demolished on September 11, 2020. No environmental concerns or incidents were observed or reported during the demolition activity.

At the time of the site assessment in March 2023, there were no buildings on the property (Photo 1). There was no major change in vegetation compared to the conditions described in 2021. The drainage features on the property were the same as described in the 2018 and 2021 ESA assessments. These features included a wetted area dominated by sedge on the south side of the property (Photo 2). This area drained to the north via a constructed ditch to a series of wetted pools along the western portion of the property (Photo 3). Overflow from these pools drained to the east through the vegetated depression in the middle of the property where it entered the previously documented ditch on the east side of the property (Photo 4). The ditch then flowed east

¹ City of Campbell River. 2021. SOCP Interactive Map.

<https://webmap.campbellriver.ca/Html5Viewer/Index.html?viewer=SOCP2016> (Accessed March 10, 2023).

² Community Mapping Network. 2023. Wildlife Tree Stewardship Atlas.

https://cmnmaps.ca/WITS_gomap/ (Accessed March 10, 2023).

³ Community Mapping Network. 2023. British Columbia Great Blue Heron Atlas.

<https://cmnmaps.ca/GBHE/> (Accessed March 10, 2023).

under the highway and discharged to the intertidal zone. The shallow pools on the west side of the property were determined to be seasonally wetted and not likely to offer quality breeding habitat for amphibian species. No new rare or sensitive wildlife or habitat features were documented during the March 2023 assessment.

Development Considerations

As part of the proposed multi-family development on the property, the identified drainages on the property will need to be managed. Three proposed stormwater management drainage routes for the development of the property have been proposed⁴. All three proposed routes involve culverting the drainages on the subject property. Drainage Route 1 would maintain the existing drainage route on the property and culverting the existing ditch on the east side of the property between 1960 and 1940/1948 South Island Highway. Drainage Routes 2 and 3 both involve directing the culverted drainages on the property to the existing storm sewer on Nunns Road or Simms Road, respectively. Drainage Routes 2 and 3 would avoid work in the existing ditch and associated EDPA. At this time, none of the proposed routes would include the need for offsite or downstream drainage or sewer upgrades.

The assessment in 2021 determined that the pooled surface water on the property was a result of the subject lot being lower in elevation than the developed properties to the north and south. This resulted in surface drainage from the surrounding properties collecting on the subject lot during wet conditions. As the surface water on the property is not a natural watercourse, it does not meet the definition of a stream under the *Water Sustainability Act* (WSA) and therefore the WSA does not apply. As well, as the surface drainages on site do not provide fish habitat, do not have connection to upstream or downstream freshwater fish habitat, and do not meet the definition of a stream under the *Riparian Areas Protection Regulation* (RAPR), there is no requirement for further assessment under the RAPR.

If any open drainage remains on the property, a 2m vegetated setback (from top of ditch bank) is recommended to prevent erosion and protect downstream water quality in the marine environment. Once the drainages on the property have been culverted, the Streamside Protection and Erosion Areas (SPEA) that would have been established on them (2 m setback for a non-RAPR drainage) would no longer apply. The following section provides environmental protection measures that are to be applied during and following development to ensure the protection of water quality.

Environmental Protection Measures

The proposed work activities must be conducted in such a manner that potential environmental impacts are fully avoided or mitigated. The following measures will be applied to development at 1940 Nunns Road.

Environmental Monitoring and Reporting:

- Environmental monitoring will be required during some of the proposed development activities at 1940 Nunns Road. The property owner/developer is responsible for ensuring that the Environmental Monitoring requirements are fulfilled, and clear communication protocol must be established between the developer, contractor and Environmental Monitor (EM).

⁴ Highland Engineering Services Ltd. 2022. Storm and Sanitary Capacity Review: 1940 Nunns Road, Campbell River BC. Prepared for Evan Larkam, Northland Developments Ltd.

- An EM must be present during clearing and grading within 5 m of the identified drainages, any culvert work at 1940 Nunns Road or in the existing ditch east of the subject property. It must be communicated to the contractor(s) that no work is to occur within the drainages or ditches without contacting the EM.
- Circumstances such as heavy rainfall or an environmental incident should trigger the developer to immediately contact a qualified EM to assist in evaluating and mitigating potential impacts.
- The EM must have the authority to modify and / or halt any activity if deemed necessary for the protection of the environment, or to meet regulatory or other agency requirements.
- An EM report will be required for work within the ditches and for any additional monitoring completed during the development process. Any results from nest surveys (if required) must be included in the report. The EM report must be submitted to the City of Campbell River upon completion of development.

Protection of Environmentally Sensitive Areas:

- Work within the drainages will be completed in the dry. This will be achieved either by scheduling the work to occur during dry periods when the drainages on the property are confirmed to be dry, or if water is present, by site isolation.
- If site isolation is required, flow must be intercepted upstream of the work area. Clean water will be pumped around the work site and discharged downstream of the work area to maintain clean water flow in the ditch.
- Prior to any work activities in a wetted drainage, any amphibians or wildlife will be removed and relocated to suitable habitat outside of the work area. An amphibian salvage permit (*BC Wildlife Act*) will be required for the salvage.
- If vegetation clearing is planned between March 15 and August 15, a migratory bird breeding activity survey must be completed to ensure compliance with the *Migratory Bird Convention Act*.

Erosion and Sediment Control:

- Activities requiring extensive excavation or soil movement should not be scheduled for periods when heavy rainfall or snow melt is expected. If work is occurring during these periods an Environmental Monitor should inspect the work area to confirm and document that there is no release of turbid water from the property.
- Installation of culverts and services must be completed during dry conditions, or with site isolation if ditches are wetted at the time of the work, as noted above.
- An environmental monitor must be present during work within the ditches to monitor water quality or to confirm that the ditches are dry.
- Disturbed soils with hydrological connection to ditches, including surrounding catch basins must be stabilized immediately following disturbance.
- If stockpiles or spoil piles are to be stored on the property, they must be stored as far as possible from ditches and catch basins and protected against erosion by an impermeable layer such as tarps or poly during rain events.

- Machinery will use existing access points and work from the top of bank with no encroachment into the ditch channel.
- Site access must be kept clean to avoid tracking dirt or mud out onto roads.

Water Quality:

- During or after development no untreated water may be directed to area drainages.
- Downstream water quality will be monitored during any work within the ditch when flow is present.
- To protect water quality in the ditch downstream of the work area and in the intertidal zone the BC Approved Water Quality Guidelines (BCAWQG) for the protection of freshwater and marine aquatic life would apply for any site discharge as shown in Table 1.
- If downstream water quality approaches or exceeds thresholds shown in Table 1, work will be paused, and suitable measures developed to ensure water quality remains compliant with the appropriate regulations.

Table 1. BC Approved Water Quality Guidelines for the ditch work at 1940 Nunns Road.

Parameter	Criteria
Turbidity - Nephelometric Turbidity Units (NTU) ¹	<p>Change from background of 8 NTU at any one time for a duration of 24 h in all waters during clear flows or in clear waters</p> <p>Change from background of 2 NTU at any one time for a duration of 30 d in all waters during clear flows or in clear waters</p> <p>Change from background of 5 NTU at any time when background is 8 - 50 NTU during high flows or in turbid waters</p> <p>Change from background of 10% when background is >50 NTU at any time during high flows or in turbid waters</p>
pH	6.5 – 9.0
Oil and grease ²	Not detectable by sight or smell

¹ Values are from BC Approved Water Quality Guidelines (2019) for turbidity and suspended and benthic sediments.

² Values are from BC Compendium of Working Water Quality Guidelines (2006) – Aquatic Life

Concrete Management:

- Any grouting or concrete work must be conducted in isolation from water flow and any wastewater must be contained for appropriate offsite disposal or treated with CO₂ to neutralize pH as per Table 1.
- Uncured materials should be disposed off site or contained on a suitable impermeable layer and allowed to harden before disposal as general construction waste. No uncured grout or cementitious material is to be disposed to ground or water.

Prevention and management of spills:

- Vehicles and equipment are to park in **designated locations** and must not pass out of the designated work area when on the property.
- All heavy equipment must be in good working order, clean and leak-free. Ensure no invasive plant debris or excessive mud are on the machinery when arriving at site.
- All equipment must be equipped with a spill kit with contents appropriate for the volume and type of fluids contained within the equipment. Any materials from the spill kits used during the work must be disposed of appropriately and replaced within one working day.
- Any fueling must occur as far as possible from any ditches and catch basins. Have spill supplies immediately on hand during fueling operations.
- No servicing of equipment is to occur on site.
- In the event of a spill to ground or water, the contractor is responsible for responding to contain and / or clean-up the spill if it is deemed safe to do so. Once the crew has determined that they can work safely, the responders should:
 - Stop the spill (clamp hose, upright container, block hole etc.).
 - When warranted, define the spill area to prevent workers from walking / driving through the released material and spreading to other areas.
 - Contain the spilled material (berms, pads, ditches etc.).
 - Clean-up the spill if possible. If the spill is significant, a professional spill response contractor may be required.

Report the spill to the EM and to the appropriate agencies (when required) as soon as practicable, and by end of day. The EM can assist in determining what notifications are required, depending on the nature and volume of the spill.

Waste Management:

- Hazardous waste is not expected, but if encountered the crew must adhere to all applicable legislation with respect to the handling, transportation, and / or disposal of all materials. These regulations may include the *B.C. Hazardous Waste Regulations, Spill Reporting Regulations, WorkSafeBC Regulations, Transportation of Dangerous Goods Regulations, and Controlled Products Regulations, etc.*
- Waste must either be removed from site daily or stored in secure containers to prevent dispersion of the wastes after hours (due to weather / vandalism / wildlife).
- Any portable toilets brought to site are to be placed in a location at least 30 m from ditches and as far as possible from the storm drain and secured to prevent tipping. The toilets are to be removed within two days of the project being complete.
- The contractor is to maintain a tidy work area at all times.

Environmental Measures Review:

Date:

Contractor Representative:

(Print name)

(Sign
name)

Project Owner Representative:

(Print name)

(Sign
name)

Environmental Monitor:

(Print name)

(Sign
name)

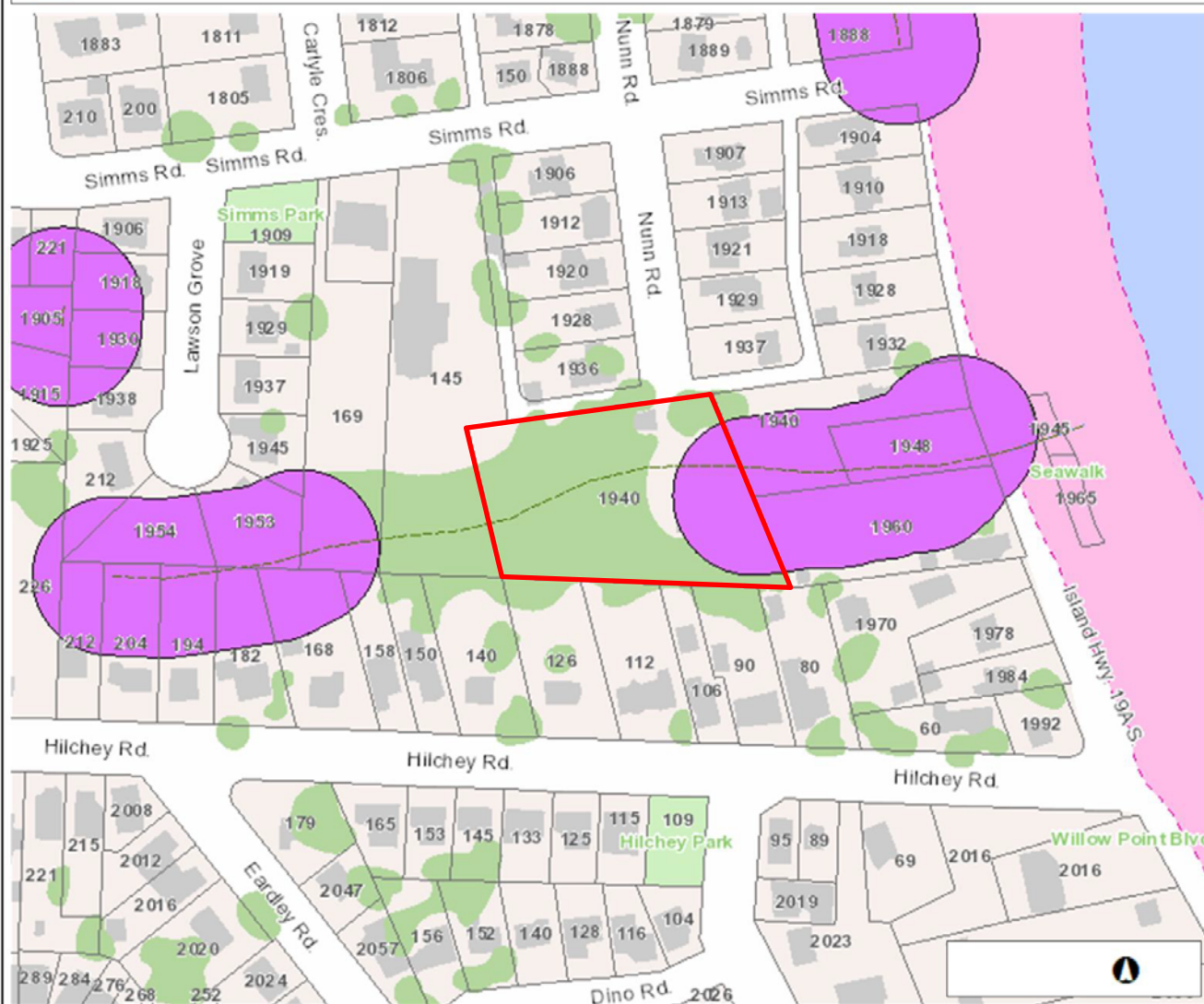
Document prepared by: Mac Easton, RBTech

Signature:



Date: April 13, 2023

Figure 1. The City of Campbell River SOCP mapping of environmentally sensitive features in the vicinity of 1940 Nunns Road.



Legend

Neighbourhood Names
Park Names
Lake Names
Stream Names
Street Names

Urban Containment Boundary

City Boundary

Property Parcels

<all other values>

3258

Great Blue Heron Nest Tree

Great Blue Heron Nest DPA

Bald Eagle Nest Tree

Bald Eagle Nest DPA

Drinking Watrshed DPA

Ditches

Creeks and Streams

Ditch DPA (part of Streamside DPA)

Streamside DPA

Wetlands

Storm Detention Ponds

Wetland DPA (part of Streamside DPA)

Foreshore DPA

Campbell River Estuary DPA

Sensitive Ecosystem Inventory (SEI) Pc

Older Forest

Riparian

Older Second Growth Forest

Sparsely Vegetated

Terrestrial Herbaceous

SEI Wetlands

Comprehensive Environmentally Sensitive DPA

45 0 45 90 Meters

NAD_1983_UTM_Zone_10N
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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION



Photo 1

A view looking south over the clearing where the former house was removed at 1940 Nunns Road in March 2023.



Photo 2

A view east looking through the wetted sedge area along the south side of the property.



Photo 3

A view west looking at the pooled surface water present along the northwest portion of the property.



Photo 4

A view east looking at the shallow, unconfined overflow from the shallow pools on the west side of the property through the vegetated depression flowing towards the ditch on the east side of the property.