



April 18, 2011

Project No: 11-741

Corporation of Peachland  
5806 Beach Avenue  
Peachland, BC  
V0H 1X7

**Subject: Interim Response to Ministry of Natural Resource Operations Letter (Feb. 24, 2011)**

Ecoscape has been retained to participate with the lead project consultant, HB Lanarc in environmental landuse and development planning for the New Monaco project located at [3599 Highway 97 South](#), Peachland BC. Ecoscape had conducted the initial site assessment in 2007<sup>1</sup>. Since that time, it is our understanding that project planning continued and that a preliminary Area Structure Plan concept was submitted to Peachland and subsequently referred to the Ministry of Natural Resource Operations (MNRO) for review and comment. The following letter begins to address comments provided by the MNRO (Feb. 24, 2011). In addressing comments raised by MNRO, it should be noted that the design is currently being modified through consultation with Ecoscape to better suit the site as per the results presented in the 2007 by Drieschner et al. (2007) and further through more in-depth site assessments by Ecoscape in spring 2011.

The first two bullets on page 1 (MNRO, Feb. 24, 2011) refer to two (2) properties, in which the Ministry has conservation interests. Specifically, the MNRO referral comments request that consideration be given to the maintenance of wildlife connectivity between remaining conservation properties. Currently, Hwy97C completely fragments any functional connection for terrestrial wildlife between the subject property and the upslope reserve habitat to the north (Lot A D.L. 449 Plan KAP46840 and Lot B D.L. 2690 Plan KAP46840). Specifically, wildlife fencing and the 4-lane express highway represent an almost complete barrier to terrestrial wildlife, which restricts access to the subject property. In regards to birds and bats, while providing a suite of habitats within, the subject property may also act as a stepping stone and migration route for individuals moving between upslope habitats (to the north) and Okanagan Lake and associated riparian communities (including those that occur in the Nature Trust parcel - Lot A Plan KAP85621). These natural values have been conveyed by Drieschner et al. (2007) and Ecoscape and the planning team will work to maintain key corridors such as Drought Creek and other important habitat areas, which provide nesting and feeding habitats as well as security cover for birds moving between sites. In addition, working through subsequent detail planning stages, one of the design objectives will be to incorporate elements, apart from riparian corridors and other

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<sup>1</sup> Drieschner, D., M.A. Olson-Russello, and K. Hawes. 2007. Preliminary environmental inventory and sensitivity analysis – Interim Report for the proposed New Monaco Resort Development, Peachland, BC. Ecoscape File: 07-179. 49pp.



development free zones (ESAs), to create "stepping stones" that will provide security cover for passerines and bats that will help to maintain linkages between adjacent natural areas opposite both the Hwy 97 and 97C corridors from the subject property. Design elements will include green roof treatments, and landscape guidelines to create a more integrated urban design (within existing disturbed sites). At the same time, it will be important to also incorporate design elements that will mitigate the risk of injury and mortality to birds and bats associated with window strikes and other urban threats.

In terms of avian and bats and habitat connectivity, the Drought Creek corridor provides the most direct and viable route. As indicated above, the design is currently being revised to ensure that this and other functional connections are preserved.

In regards to terrestrial wildlife, notably ungulates (mule deer and bighorn sheep), the subject property will remain isolated from upslope reserve areas due to the Hwy97C corridor and wildlife fencing. A viable connection across Hwy97 occurs to the north, which connects these reserve lands to the Goat's Peak area (east of the Gorman's Mill), which provides high quality core habitat areas wildlife.

Points three and four relate to the protection of Environmentally Sensitive sites (ESAs) identified on the subject property (Drieschner et al. 2007). The development will be focused in areas that are either currently orchard or fallowed field. Ecoscape has now been retained to work with the design team to ensure that the ecological values intrinsic with the site are considered and preserved in the development plan. Initial dialogue regarding potential pockets of development in the open pine forests, that occur over the western portion of the site, is leading to a detail ground inspection to identify any pockets that may be suitable for some form of low impact, integrated, development nodes that will maintain the pine and open grassland savanna. The intent will be to clearly delineate potential sites and develop specific design guidelines and prescriptions that would be incorporated into the development to maintain natural integrity and to mitigate edge effects and potential impacts to wildlife (e.g. snake mortality and loss of pine - grassland savanna).

Drought Creek is the only ephemeral watercourse that occurs through the subject property. Initial assessments by Ecoscape (2007-2008) revealed surface flows. However, discussion with one landowner suggests that the primary source of the surface flows is a licensed water supply that pipes water from the west and discharges to the creek to alleviate pressure in the older irrigation pipes that currently supply water to the orchard. To address the status of Drought Creek under all applicable provincial and federal legislation, Ecoscape will conduct a thorough review of the corridor both upslope and downslope of the subject property in accordance with the Riparian Areas Regulation. Through this process, Ecoscape will also ensure that works are in accordance with the requirements under Section 9.0 of the Water Act. Concurrently appreciation will be given to the fact that there are water licenses downstream of the subject property such that these water rights are protected.



This letter is intended as an interim response to the comments and concerns expressed by the MNRO in the letter dated February 24, 2011. Ecoscape has been retained to work with the planning and design team to move forward with environmental landuse planning and development of site design guidelines that will aim at satisfying the principles of environmental landuse planning. During this process, we will complete the Environmental Impact Assessment to further refine environmentally sensitive areas, protective buffers, and connectivity corridors. At the same time, we look forward to future open discussions with MNRO officials.

If you have any questions pertaining to this letter or previous work carried out on the site, please contact the undersigned.

Respectfully Submitted  
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