



Innovate Design Collective  
1-5401 Hamsterly Rd  
Victoria BC V8Y 1S4  
Attn: Dennys Dillon

April 20, 2026

## **RE: Environmental Review for Unpermitted Work in DPA #1 – Natural Environment and DPA #2 – Hazardous Conditions 322 Plaskett Place, Esquimalt, BC.**

On February 5, 2026, Lehna Malmkvist, MSc. RPBio visited 322 Plaskett Place to review the condition of DPA #1 – Natural Environment, and the shoreline area, with regard to the installation of unpermitted shoreline access stairs and landing that have been installed, and to provide an assessment of the structure with regard to the DPA#2 Guideline: The use of construction materials that may leach toxic chemicals over time into the land or water should be avoided.

### **Existing Condition**

The property is a single family lot, with an existing home and extensive lawn, wooden deck, and landscaping with Douglas-fir (*Pseudotsuga menziesii*), arbutus (*Arbutus menziesii*) and grand fir (*Abies grandis*) (Photo 1). The shoreline slope, consists of a densely vegetated slope below the landscaped top of bank. The shoreline vegetation is a mix of native and invasive, non-native species (Photos 2-10). The native species consists of common snowberry (*Symphoricarpos albus*), Nootka rose (*Rosa nutkana*), ocean spray (*Holodiscus discolor*), June plum (*Oemelaria cerasiformis*), dull Oregon-grape (*Mahonia nervosa*), red flowering currant (*Ribes sanguineum*)(planted at the top of bank (*Sanicula crassicaulis*) and licorice fern (*Polypodium glycyrrhiza*). Non-native species include ornamentals, along with invasives such as Himalayan blackberry (*Rubus armeniacus*), English ivy (*Hedra helix*), spurge laurel (*Daphne laureola*), Scotch broom (*Cytisus scoparius*), thistles (*Cirsium* sp.), orchard grass (*Dactylis glomerata*), agricultural grasses, and dove's foot geranium (*Geranium molle*). *Note: vegetation identification was limited due to the time of year.*

Historic shoreline access was removed from the site between 2017 and 2021 (Figures 1 and 2), leaving a gap in the shoreline vegetation that where agricultural grasses are established and yardwaste has been deposited, which is smothering the vegetation underneath (Photos 7 and 8). The footprint of the historic access was approximately 20m<sup>2</sup>.

### **Unpermitted Work**

New stairs and landing to access the shoreline were installed, without a permit, between 2023 and 2025 along the south property boundary (Figures 3 and 4). The stairs were constructed with an aluminum frame and composite decking, on concrete footings (Photos X). The footprint of structure is 22.7m<sup>2</sup>. The new structure is suppressing, but not eliminating vegetation growth within the footprint (Photo 2-5).

### **Materials**

DPA#2 Guideline - The use of construction materials that may leach toxic chemicals over time into the land or water should be avoided.

The materials used are aluminum, composite decking and concrete footings. See Appendix 1 for the materials sheets, which specify that the aluminum is free from contaminants and radioactivity, and the

composite decking (TimberTech WPC) is considered low toxicity in its composite form, provided that dust is not released to the environment. Additionally, composite decking will not release preservative chemicals in the way that treated lumber will. Concrete, once cured, is low toxicity to the marine environment.

### Restoration Recommendations

To meet the DPA#1 Guidelines, the following actions are recommended to restore the area of the historic shoreline access that has been removed, to compensate for the area that is covered by the new structure. See Figure 4 for the proposed planting area and planting list.

- Canadian Landscaping Standards should be met for sourcing plant materials, installation, and maintenance.
- Site preparation and maintenance:
  - Remove yard waste from DPA
  - Remove invasives from planting area
- Install plants
- Mulch (10cm composted mulch)
- Irrigate and control invasives for a minimum of 3 years to establish plants, then wean off irrigation

### Summary

Restoring the habitat within the footprint of the historic shoreline access will compensate for the habitat impact within the footprint of the new structure, while allowing a replacement shoreline access (former access was removed between 2017-2021). The materials used in the structure are low toxicity and not expected to leach toxic chemicals over time.

Development Permit Guideline Tables are in Appendix 2.

Please do not hesitate to contact me with any questions you may have.

Sincerely,



Lehna Malmkvist, MSc, RPBio (#1613)





Figure 1. 2017 Airphoto showing historic shoreline access.

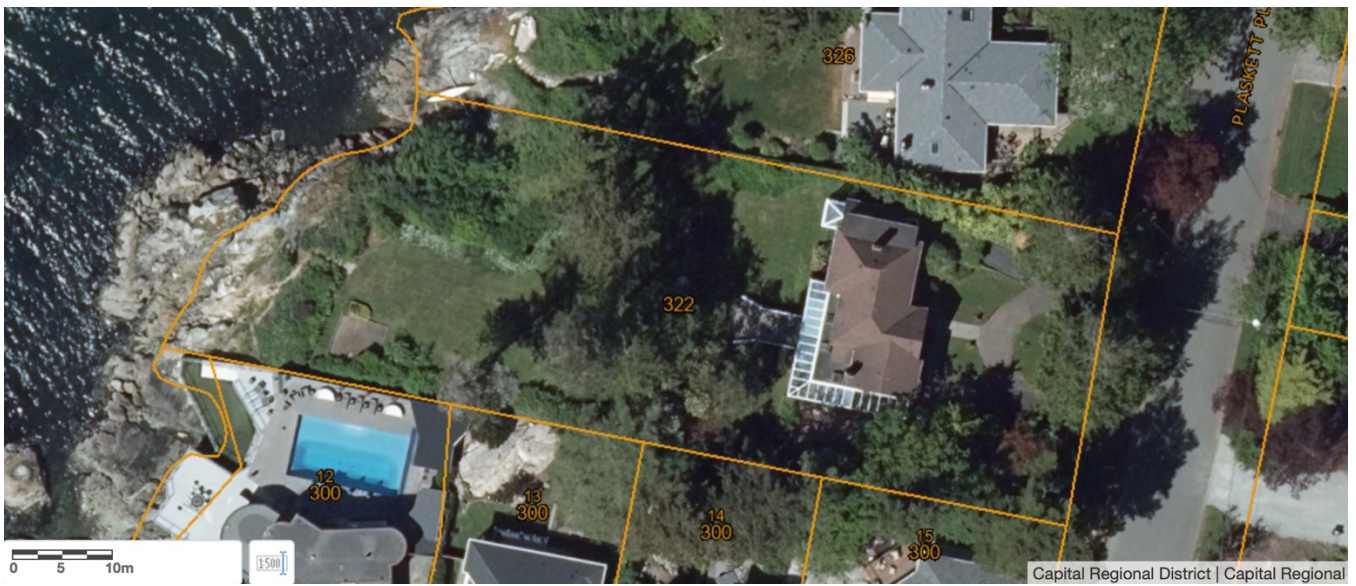


Figure 2. 2021 Airphoto showing historic shoreline access removed (2019 Airphoto was not clear if access was in place or removed).



Figure 3. 2025 Airphoto showing new shoreline access installed.

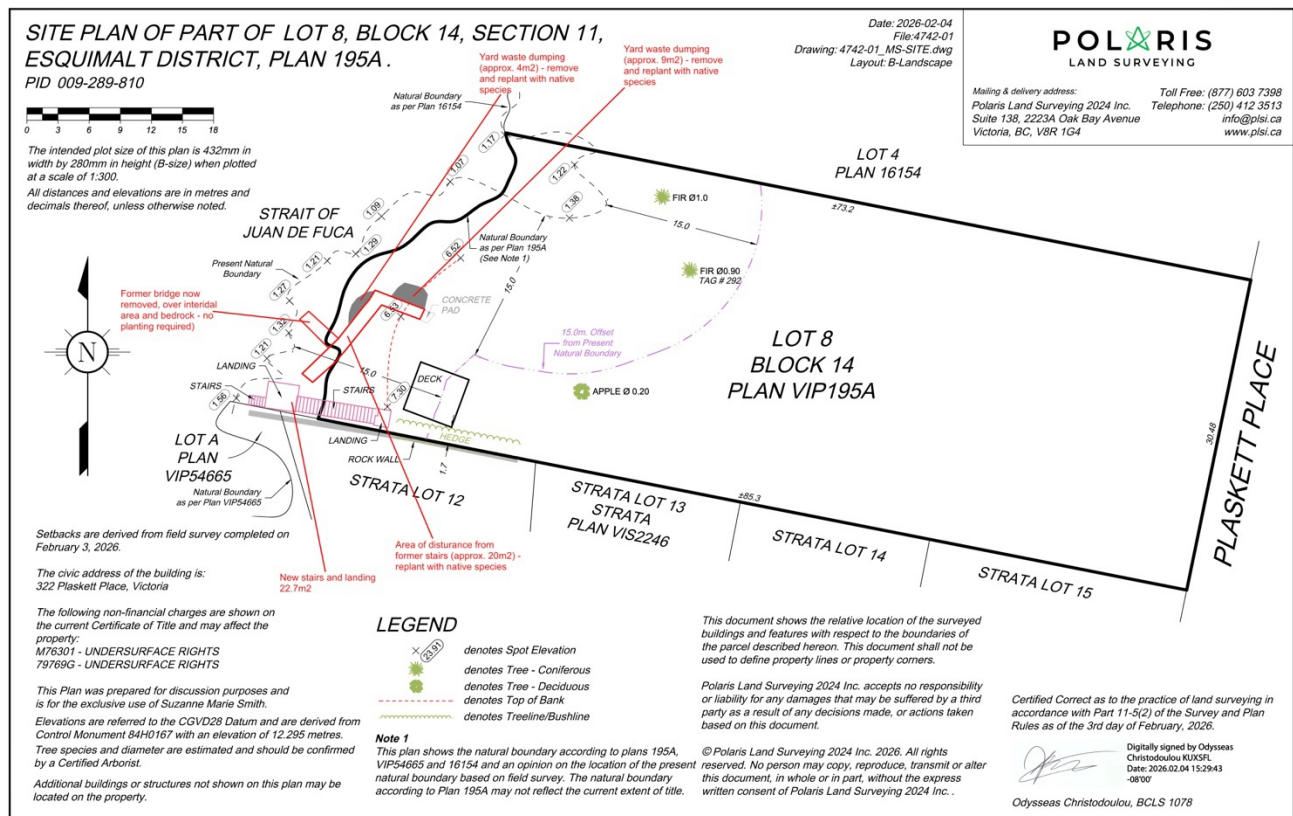


Figure 4. Survey plan with mark up by Swell Environmental..

## 322 Plaskett Place - Shoreline Planting Plan

ocean spray	<i>Holodiscus discolor</i>	5	min. 1 gallon pot
Nootka rose	<i>Rosa nutkana</i>	5	min. 1 gallon pot
snowberry	<i>Symphoricarpos albus</i>	13	min. 1 gallon pot
red flowering currant	<i>Ribes sanguineum</i>	5	min. 1 gallon pot
June plum	<i>Oemelaria cerasiformis</i>	5	min. 1 gallon pot
<b>TOTAL (min. 1/m<sup>2</sup>, approx. 33m<sup>2</sup>)</b>		<b>33</b>	

### Site preparation and maintenance:

- Remove yard waste from DPA
- Remove invasives from planting area
- Install plants
- Mulch (10cm composted mulch)
- Irrigate and control invasives for a minimum of 3 years to establish plants, then wean off irrigation

NOTE: install plants where soil depth is sufficient for establishment, field fit during installation in consultation with the RPBio.

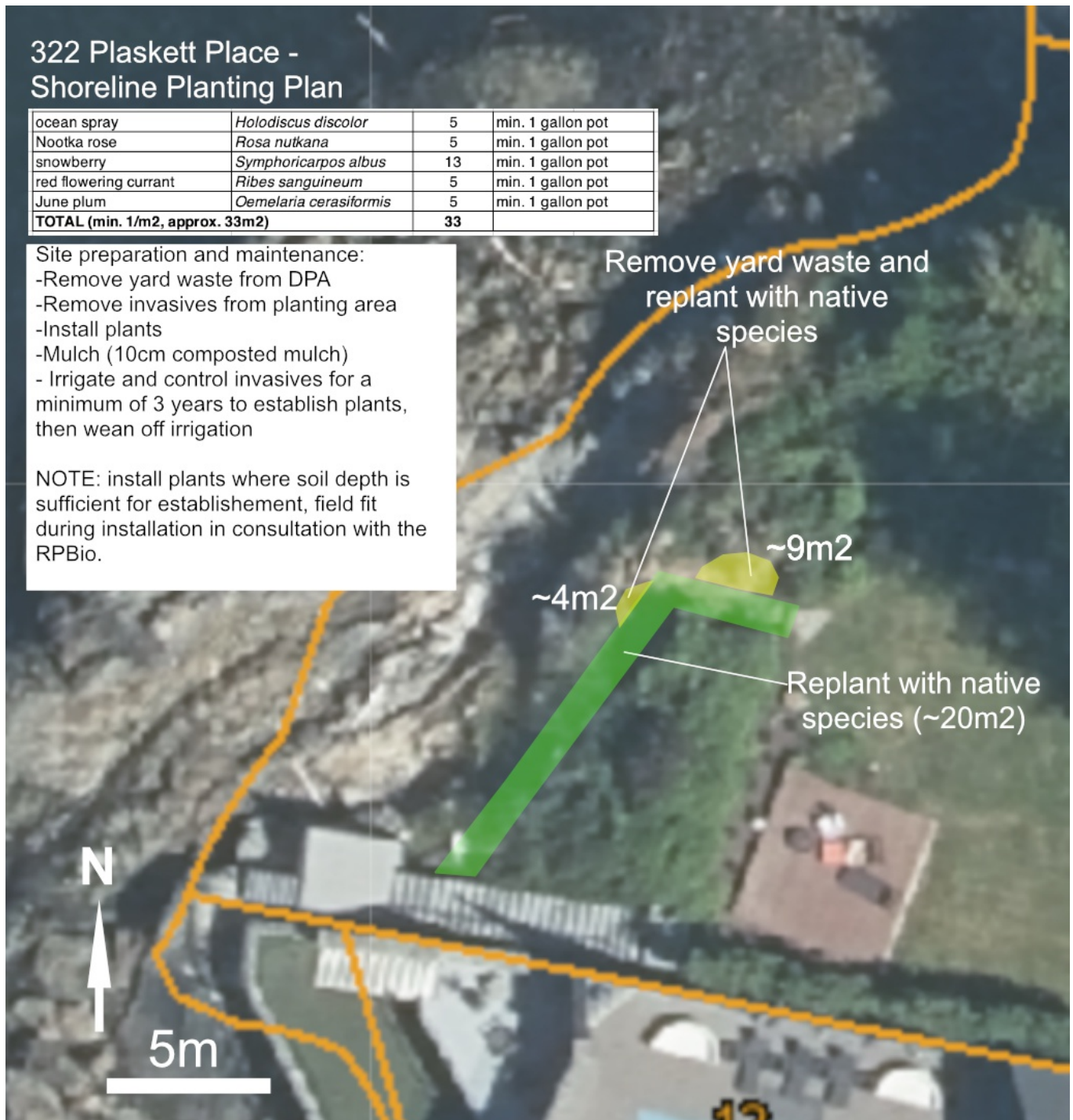


Figure 5. 2025 Airphoto with proposed restoration areas.



Photo 1. Lawn, landscaping and wooden deck at the top of the shoreline bank.



Photo 2. New landing and stairs installed between 2023 and 2025.



Photo 3. New landing and stairs installed between 2023 and 2025.



Photo 4. New landing and stairs installed between 2023 and 2025.



Photo 5. New landing and stairs installed between 2023 and 2025.



Photo 6. Historic shoreline access (removed between 2017 and 2021).



Photo 7. Yard waste on shoreline slope.



Photo 8. Yard waste on shoreline slope.



Photo 9. Grassy area is approximate footprint of historic shoreline access (removed between 2017 and 2021).



Photo 10. Grassy area is approximate footprint of historic shoreline access (removed between 2017 and 2021).