



30 October 2009

Sarah Bonar  
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**RE: Green Shores Pilot Assessment of the Nanoose Bay Waterfront Project**

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Sarah,


The Green Shores Technical Advisory Group (GSTAG) has reviewed the Assessment Team’s report of the Nanoose First Nation’s Green Shores Submission, and I am attaching that report (PDF format) for your review. In the estimation of the GSTAG, the submittal that you provided, which was largely based on a completed project, met prerequisite credits and would qualify as Green Shores certified (Table 1). Some of the credits were “provisionally awarded” as submittals did not meet criteria stated in the pilot Credit Ratings manual, or as certification by a qualified professional required by the manual was not included.

***The objective of the Pilot Projects is not to determine certification*** but rather to test the certification process. This pilot was extremely helpful in identifying some issues with the credit program. Here are a few of the items that we learned about the process from the Nanoose Pilot.

1. The Assessment Team reviewed the *wording* in the GreenShores Credit Rating Manual very carefully and as a result, identified several credits where the wording is ambiguous. For example, for the Project Building and Siting Credits (PBS), the assessment team did not award any credits (correctly) as there were no new buildings planned. Therefore, the project did not technically achieve the required number of “pre-requisite” assessment credits. This is really a “book-keeping” problem that requires the number of “pre-requisite” credits be adjusted for any categories that do not apply. Revisions to the Rating System and its manual will make this explicit in the future. In the meantime,, we added the pre-requisite point in the GSTAG column of Table 1 as a means of keeping the accounting straight-forward.

**Table 1 Score Summary**

	Assessor	GSTAG
Credits	Award	Award
PBS1	0	1
PBS2	0	0
PBS3	0	0
PBS4	0	0
SHCP1	1	1
SHCP2	1	1
SHCP3	1	1
SHCP4	1	0
SHCP5	1	1
SHCP6	2	2
SHCP7	0	0
SHCP8	0	0
SM1	0	0
PDP1	1	1
PDP2	1	1
PDP3	1	1
Pre-Req	4	5
Optionals	6	5

 pre-requisite credit


2. GSTAG thought the project went beyond the normal outreach by encouraging “ownership” and “stewardship” within the community. However, the way that the existing credits are written, there is no flexibility to provide an additional credit for this. GSTAG will likely be revising the credits to accommodate a “stewardship” optional credit.
3. GSTAG thought the Assessment Team did a good job at minimizing credit double counting, which has been a problem in other pilot assessments. GSTAG is working at revising the language to minimize confusion about double-counting.
4. GSTAG disagreed with the Assessment Team on their award of SHCP4 credit – Rehabilitation of Critical or Sensitive Habitats. GSTAG noted that there were no pre-existing critical or sensitive habitats identified at the site, so it is not possible to rehabilitate them. SHCP5 was awarded – Rehabilitation of Degraded Habitats; GSTAG agreed that this was the more appropriate credit for the berm and beach restoration. The Assessment Team had split these two credits between different assessors, which probably complicated the credit review.

Additional comments are summarized in Table 2 and, as noted previously, the Assessment’s Team report (Assessment Matrix) is attached as a PDF.

*We would like to thank the Nanoose First Nation and Chatwin Engineering for their timely participation in this Green Shores Pilot Project.* We also commend the Nanoose First Nation and Chatwin on successfully completing this shore-friendly project that has generated obvious pride within the community. We ask that the Nanoose First Nation allow the results of the assessment to be posted in the “pilot” sections of our website ([www.greenshores.ca](http://www.greenshores.ca)).

Should you have any questions, please feel free to contact us.

With regards,



John R. Harper, Ph.D., P.Geol.  
Pilot Project Coordinator  
Green Shores Technical Advisory Group

cc Chief David Bob

**Table 2 Summary of Issues Related to Green Shores Credit Rating for Essencia**

<b>Number</b>	<b>Credit</b>	<b>Explanation</b>
PBS1	Siting of New Permanent Structures	Technically no credits should be granted because there were no proposed structures. However, there has to be some way of crediting for the required pre-requisite. Also, by not allowing any optional credits for the entire category, it makes it hard for a park-restoration project to achieve a high number of credits. <i>Yet this is the type of project we want to encourage.</i> GSTAG needs to review this issue in any credit re-writing.
PBS2	Optional Siting Credit	not applicable
PBS3	Conservation Area Designated	not applicable
PBS4	Remediation of Contaminated Sites	not applicable
SHCP1	Conservation of Critical and Sensitive habitat	no issues
SHCP2	Riparian Zone	no issues
SHCP3	Conservation of Coastal Sediment Processes	no issues
SHCP4	Rehabilitation of Sensitive Coastal Habitat	GSTAG felt this credit should not be awarded because there were no pre-existing sensitive or critical habitat that could be rehabilitated.
SHCP5	Rehabilitation of Degraded Habitat	GSTAG felt this was the more appropriate credit for the berm reconstruction. the “degraded” habitat was the previously “hardened” shoreline, which is now softer.
SHCP6	Enhanced Riparian Zone	Assessors noted that this credit was relatively easy to assign because of the “metrics” involved with “riparian accounting”.
SHCP7	Light Pollution Reduction	GSTAG felt that this credit should be awarded if NO lighting of foreshore/riparian area is proposed so we don’t actually encourage lighting to be installed just to get a credit (i.e., “credit mining”). Credits will be updated to reflect this change. GSTAG may also alter language to encourage modification of pre-existing lighting to meet light-trespassing standards.
SHCP8	Remediation of Coastal Processes	The Assessors felt that (a) a credit had already been awarded for the beach nourishment as habitat improvement (SHCP5) and (b) the submittal did not include any information that indicated that the beach nourishment had been designed to be sacrificial.
SM1	Storm-water credit	not relevant
PDP1	Environmental Management Plan	no issues
PDP2	Innovation	no issues
PDP3	Education and Outreach	GSTAG thought that this project provided an exceptional example on the value of stewardship and that revised ratings should include a separate category allowing multiple credits in the category, one of which would be for stewardship.