

Overview of APC Amendments Bylaw to 4270 OCP for the Electoral Areas

Table 1: Table of APC Referral Comments

Section	Actions
General Development	<p>Added/amended: Water purveyors should ensure water quantity and quality are adequate for future growth of the area, including community water connections and consistent with zoning build-out.</p> <p>CVRD comment: Added.</p>
	Island Trust comments:
3.1.7.3 Marine Designation Objectives	<p>Added/amended: Avoid dangerous and toxic materials.</p> <p>CVRD comments: Added.</p>
3.1.9.2 Residential Designation policies	<p>Deleted: Amenity bonusing will be enacted in certain areas if site conditions warrant in order to, among other things, preserve open space, natural tree cover and environmentally sensitive areas, leaving slopes unaltered.</p> <p>CVRD comment: Amenity bonusing belongs in the zoning bylaw. Will be reviewed in the zoning bylaw during harmonization/modernization.</p>
2.5.1 Goal M4. Manage Infrastructure Sustainably	<p>Added/amended: South Cowichan service expansions and constraints: Mill Bay will expand sewer service, which may enable further development, dependent on additional capacity of water provision by the improvement district.</p> <p>Shawnigan Village has a private water service and capacity for expansion, but there is no sewer service. The addition of sewer service in Shawnigan Village could impact further development.</p> <p>Cobble Hill growth containment boundary is anticipated to have a unification and expansion of sewer service. Similar to Mill Bay, Cobble Hill's water system, also an improvement district, can support additional single-family housing, but not commercial or multi-family due to fire flow constraints.</p> <p>CVRD comment: Added by CVRD utilities/planning staff.</p> <p>Provides more clarity for discussions on growth containment boundary in the modernization.</p>
	Added/amended: Other servicing area constraints:

	<p>Cowichan Bay does not have surplus capacity and is unable to support any further connections or increases in demand from existing customers. It is not known when additional units may be obtained. The Cowichan Bay sewer service covers almost all of the urban containment boundary (UCB) in the village area, while the CVRD's Lambourne sewer system provides service in the Lambourne area. The Cowichan Bay system in turn conveys sewage to the Duncan-North Cowichan Joint Utilities Board (JUB) treatment system on the basis of capacity units. Both areas are served by Cowichan Bay Waterworks Improvement District, which has substantial surplus capacity.</p> <p>Only Mesachie Lake is served by a CVRD sewer system in electoral area F. It is about 70 years old, dilapidated and does not meet modern standards. An infrastructure grant for \$1.2 million was received to replace the disposal system with a pump station and pipeline to property held by Couverdon in Honeymoon Bay in which a new disposal field would be developed. Couverdon would transfer the property to the CVRD in exchange for rezoning. This new disposal area could also serve connections from Honeymoon Bay in future. Additional grant applications are being pursued to build a treatment plant and enhanced disposal system and provide new servicing in both Mesachie Lake and Honeymoon Bay. CVRD water systems serve both Mesachie Lake and Honeymoon Bay with ample surplus capacity.</p> <p>All of the Youbou area is served by a CVRD water system with substantial surplus capacity. A small CVRD sewer service serves the Creekside development at the east end of Youbou in electoral area I. The system is underloaded and could provide for additional connections. Also, additional ground disposal capacity was acquired so further expansion is possible but would require expansion of the treatment works.</p> <p>CVRD comment: Provides more clarity for discussions on growth containment boundary in the modernization.</p>
3.1.2.1 Objectives	<p>Added/amended: Add underlined words: Reduce residential and commercial impacts on agricultural activities through appropriate use of buffers, large lots and setbacks <u>on the residential and commercial lands.</u></p>
3.1.2.2.6 Policies	<p>Added/amended: Add underlined words: May permit outdoor recreation uses <u>of non-ALR lands</u> where it can be demonstrated that there is no reduction in the amount of land being used for agricultural purposes and no impact on surrounding agricultural uses on lands designated as Agricultural and Rural.</p>
3.1.2.2.10 Policies	<p>Added/amended: Add underlined words: Does not support any requests for subdivision of <u>ALR land</u> unless the new parcel is 0.8 ha (2 ac.) or less in size and is sited on soils having an agricultural capability rating of class 4 or higher as noted in the Land Capability Classification.</p>

3.1.3.1 Renewable Resource – Forestry Designation	<p>Added/amended: Delete underlined words: Consider establishing a soil deposit and removal regulation service for the rural areas of the regional district and the enactment of bylaws dealing with the deposit of contaminated soils on Renewable Resource lands</p> <p>CVRD comment: New Bylaw 4236: the first part of the policy has been implemented and is no longer necessary. The second part is outstanding insofar as the bylaw doesn't deal with the deposit of contaminated soils on renewable resource lands, except to the minor extent that the bylaw (s. 17.12) enables the RD to have soil depositors confirm that the deposit of soil that appears to be contaminated is properly authorized by the Province.</p>
	<p>Added/amended: Review corresponding official community plans and include a growth management policy that considers wildfire risk and other natural hazards during development.</p> <p>Review the corresponding official community plans and supporting documents to incorporate wildfire management considerations in parks acquisition, maintenance and trail development.</p> <p>Review the language within each official community plan and identify wildfire/interface fire as a natural hazard to public health, safety and to the regional district economy.</p> <p>CVRD comment: Added</p>
Local Plan Changes – Agriculture	<p>Added/amended:</p> <p><i>Area A</i></p> <p><i>Area B</i> Should consider policies s. 473 (1)(b) in respect of agricultural land use.</p> <p><i>Area C</i> changing “shall” to “may” in 2.2.2.2 dealing with the use of “lower capability lands”.</p> <p><i>Area D</i> For ALR land, processing and storage are designated as farm uses in s. 11 of the ALR Use Regulation and require no ALC approval. The criteria referring to servicing and highway access should be removed for ALR land and for ALR land the only criterion should be that the use is permitted by the <i>ALC Act</i> and ALR Use Regulation. <u>Policies which consider rezoning</u> for non-farm uses such as affordable housing, tourism and recreational uses of ALR land are offside of 2.46 of the <i>ALC Act</i> and removed. The ALC would have to approve any leasehold subdivisions and would have to approve any covenant granted over ALR land and is unlikely to approve on referral.</p>

	<p>The ALR Use Regulation allows the RD to permit education and research uses subject to a limit on structures to 100 square metres per parcel (s. 27 of the Regulation). No ALC approval is necessary.</p> <p>Conditions: A zoning bylaw can not lawfully stipulate that a property is wholly owned by a government agency or registered non-profit organization or is a partnership of both.</p> <p><i>Area E</i> In 2.2.1.3 should “lessors” be “lessees” or “tenants”? The lessor is the landowner. ALC will be unenthusiastic about the objective that mentions zoning for community gardens. ALC will not accept the exception to the policy on ALR exclusion etc. for neighbourhood plan processes. This policy encourages land speculation. The ALC may be concerned about the policy supporting the use of ALR land for “therapeutic purposes,” even in association with farm use.</p> <p><i>Area F</i> Same comment about ALR exclusion for land within urban containment boundaries—the ALC would ordinarily require the urban containment boundary to exclude ALR land. The policy on use of land with lower capability should be worded like 2.2.2.2 in area C, mentioned above.</p> <p><i>Area G</i> The policy on subdivision for non-agricultural uses not acceptable to ALC in respect of ALR land.</p> <p><i>Area H</i></p> <p><i>Area I</i></p> <p>CVRD comment: Amended/deleted for consistency with the ALC regulations.</p>
Section 4.1 Monitoring and Reviewing the Plan	<p>Added/amended: Review of a board resolution (19-224) that identified hazards in the 2018-2019 risk assessments, as detailed in the Environmental Services Division’s April 10, 2019 staff report be integrated in the following documents currently in preparation:</p> <ul style="list-style-type: none"> a. Modernized Official Community Plans and related bylaws as Natural Hazards Planning Areas; b. CVRD Asset Management Plan as Climate Risk Hazards; and c. CVRD Drinking Water and Watershed Protection Plan as key information. <p>CVRD comment: Added by the Board resolution</p>

	<p>Comments:</p> <p>“natural hazard planning area” is not defined in the April 10 staff report or the board resolution and may be at somewhat higher level than a development permit area (DPA) designation. It could mean that after a planning exercise an area that is subject to a natural hazard would be addressed by land acquisition by public authorities, hazard mitigation or other policies that would make the development permit (DP) tool irrelevant.</p> <p>The risk tolerance criteria that the CVRD is considering might categorize the risk of new development of some of these areas ‘unacceptable’, regardless of what DP conditions might be imposed. Considerations within Official Community Plan for the Electoral Areas (OCP) land use designations and zoning designations that do not allow development at all may be considered. In relation to each designation, the OCP must include a justification based on actual data and guidelines for the issuance of the permits.</p>
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Table 2: Comments on HOCP and Local Plans Objectives and Policies (APC Reps)

Electoral Area A	HOCP Objective/Policy #	HOCP Objective & Policy / Comments
	General Submission from Area A APC Regional OCP's Use of Graphics & Plans	<p>APC: The harmonized RLAP proposed has included modernization elements either as placeholders to fill out the template or to obtain some feedback. Because so much has changed between the RLAP and the current plan, the following observations are offered for staff consideration as the modernization stage revision goes forward.</p> <p>It is noted that the graphics and plans appearing in the RLAP are not in the current plan and come from multiple sources. Unfortunately, they are included at a scale which is too small to review and offer comments on their accuracy and relevance. Clear graphic information can only help people to understand the plan fundamentals.</p> <p>CVRD: There is one figure in the local area plan (LAP) for area A. Please clarify. The maps are new and located in the portal and are currently PDFs until the bylaw is adopted. The maps are new but created with existing content. There are 17 maps in area A. The map quality has been improved. It is the intention that the maps will be interactive upon bylaw adoption. It is too costly to justify this developing the maps to be interactive at this time.</p>
	Use of a Template for Harmonization General Comments	<p>APC: To expedite harmonization of the local plans it is likely a master template was prepared and used. As such, some of the generic text is probably the same in all three plans (We don't know as we only have the area A local area plan.) There is nothing wrong with this, but there are sections that are less relevant to area A that have a significant preamble, i.e., Industrial Designation lands are minimal in area A, so why such a long preamble? Area A plan needs more customization during the modernization process right from the vision statement through to the policies and objectives.</p> <p>Cut and paste errors exist e.g., there is discussion on Cobble Hill commercial from another plan in the LAP we received.</p> <p>CVRD: The template is used in the harmonization purposefully. In the modernization there will be a change from local plans to neighbourhood plans.</p>
	Definition of a Policy	<p>APC: Many of the current plan policies are not policies but a collection of regulations, procedures, etc. Some of the filler/placeholder material in the LAP is also not policy. The simple structure to develop policy is the "where as/ therefore approach": whereas there is a shortage of affordable housing stock in area A (problem statement); therefore, the Regional Board will</p>

		<p>support housing development that provides affordable choices as a percentage of any new development. From this statement, objectives can be developed including percentage of affordability and target affordability. Directors and regional staff can then measure whether policies are successful.</p> <p>We strongly suggest that all policies have objectives and actions that are measurable so that policy reviews and modifications (as required) are meaningful.</p> <p>CVRD: We concur. The modernization will be focusing on this. There are no regulations in the policies. Already the culling and review has taken 18 months, and the current objectives and policies are derived from existing content. Reminder that the harmonization purpose was to standardize, remove <i>ultra vires</i>, remove redundancy with the zoning bylaw and add clarity and brevity. Objectives and policies do not have to match. Objectives are generally where the board can have opinions outside of their jurisdiction.</p> <p>The referral to the APCs: Is the Official Community Plan for the Electoral Areas (OCP) generally consistent with the LAP?</p>
	Benchmarks	<p>APC: The RLAP needs benchmarks, and they don't exist in the current plan. If they exist elsewhere, this should be referenced. For example, X acres of passive park should be planned for on the basis of Y acres per capita; to increase residential densities, X acres of multi-family land should be designated to accommodate Y% of future housing demand; area A should maintain a five-year supply of serviced industrial land to assist in attracting employment; etc. Benchmarks are measurable and support the evaluation of policy. I note the current plan doesn't have many benchmarks, either.</p> <p>November 2020: No change... our advisement will hopefully be reflected going forward.</p> <p>CVRD: The purpose of the harmonization was not to create benchmarks. The modernization will do this. There is current work on the review of density, designations and zone regulations in preparation for this work in the modernization. The area A plan does not have a schematic logical density development in the designations.</p>
	TOC	<p>APC: The table of contents is strong and comprehensive but is obviously different than the current plan. The contents in each section need to be better organized and articulated to show the logic of the plan and why it is the way it is. This effort doesn't do this because the emphasis appears to be placed on the template and not on the content.</p> <p>November 2020: There are several examples where Table of Contents and body of text are incongruous.</p>

		CVRD: Will make some amendments otherwise for the modernization. Addressed earlier comment. Please provide specify occurrences of incongruities in the TOC and content.
	Local Context	<p>APC: The local area plan needs a context to be understood. This includes reference to projected population and demographics and underlying technical considerations. It doesn't need to be long i.e., a couple of paragraphs so anybody can easily grasp why the area A plan is what it is and not a duplicate of area I.</p> <p>November 2020: Some tables are in the harmonized LAP but there is no discussion of their implications. Statements are made, such as the importance of attracting young families, but there is nothing in the objectives or policies in this regard. There are other examples.</p> <p>For understanding the goals, context is important. While you are passionate about climate change and responding to it? What about other influences that are shaping our communities? The plan needs to consider things such as in-migration and the positive influences that can be created by planning for new growth from within the province, the country and beyond.</p> <p>The interplay and reliance with the Indigenous communities also needs to be described in all LAPs, as this is everybody's reality.</p> <p>The discussion on climate change and fossil fuels needs to be soften. It reads as a lecture. Other future influences also should be considered as potential influences, such as people living longer; Canada as an immigration haven; technology and smart regions.</p> <p>CVRD: These are good comments for the modernization. See Attachment A to the HOCP of the harmonized population, housing and employment projections, all outdated, and using different sources. These can not be changed in the harmonization. New long-range projections (2019) have been completed for the modernization discussion. The discussion on climate change will undoubtedly be substantive.</p> <p>The section on resilience and sustainability is strengthened in HOCP 3.0.</p>
	Amalgamation	<p>APC: There are parts of the RLAP that suggest that amalgamation is inevitable. If that is intended, it should be stated. If it isn't, that should be made clear. That bias will affect how people read the plan.</p> <p>CVRD: Please clarify.</p>
	2.3.1.2 – 2	<p>Objective & Policy: Consults with jurisdictions dependent on a given water supply prior to approving new development within that watershed or water supply.</p> <p>APC Chair: Align growth containment boundaries with service provision.</p> <p>CVRD: Modernization this is one of the objectives. Many LAPs state this but it is not currently occurring anywhere in the CVRD.</p> <p>See 3.1.1 Growth Containment</p>

	2.3.1.2 – 4	Objective & Policy: Discourages rezoning of rural lands to smaller parcels for residential use.
		APC Chair: Preserve rural, agricultural and environmentally significant lands.
		CVRD: See Policy Area: Communities Manage Growth Holistically
	2.3.2.2 Mill Bay	Objective & Policy: Supports housing that is consistent with the surrounding context, including character of existing neighbourhoods and rural areas.
		APC Chair: A regionally specific housing plan can't apply to Mill Bay.
		CVRD: Goal 2: Improve and Expand the Range of Housing, which includes developing a regionally specific housing continuum and increasing the right supply of housing across the spectrum of affordability. Considerations will include electoral area specifics.
	2.5.1.8	Objective & Policy: Design, manage and construct climate change-adaptive and risk-adaptive infrastructure and utilities.
		APC Chair: Not appropriate in a rural area.
		CVRD: Change to “where appropriate”.
	2.5.1.1.10	Objective & Policy: Increase opportunities for residents to walk, bicycle and use public transit.
		APC Chair: From where to where?
		CVRD: See electoral area parks plans. Area A local plan: Improve pedestrian and cycling linkages between commercial areas, parks and residential neighbourhoods.
	2.5.1.3	Objective & Policy: Encourage existing and new residents and businesses to contribute to upgrades.
		APC Chair: Needs better clarification.
		CVRD: For the modernization. These are existing objectives and policies not defined.
	2.5.1.8	Objective & Policy: Design, manage and construct climate change-adaptive and risk-adaptive infrastructure and utilities.

		<p>APC Chair: Not in a rural area.</p> <p>CVRD: Added “where appropriate”.</p>
	2.4.2.10	<p>Objective & Policy: Encourages retaining areas of mature tree cover and preserving other natural features for all development, particularly any development in environmentally sensitive areas and areas of steep slopes.</p> <p>APC: n/a</p>
	2.6.1.7	<p>Objective & Policy: Diversify agricultural crops and aquaculture products reflecting climate change projections.</p> <p>APC: How? Start funding?</p>
	2.6.1.1 - 10	<p>Objective & Policy: Objectives for protection of agriculture.</p> <p>APC Chair: None included except #3.</p> <p>CVRD: #3: Strive for regional food self-sufficiency. Please clarify whether this is the only objective supported.</p>
	2.6.1.1 - 7	<p>Objective & Policy: Objectives for protection of agriculture.</p> <p>APC Chair: None included except #5.</p> <p>CVRD: #5: Identify areas where local agriculture plans are needed. Please clarify whether this is the only objective supported.</p>
	2.7.1.1.1 - 11	<p>Objective & Policy: Support home-based businesses in residential areas that contribute to the local economy, lessen auto dependency, respect the natural environment and water resources, and enhance neighbourhood character.</p> <p>APC Chair: Not in Mill Bay plan.</p> <p>CVRD: The A designation is also intended to support the agricultural sector by accommodating supplemental employment opportunities, home-based businesses and value-added opportunities to maintain the viability of farm businesses.</p>
	2.7.1.2.2 - 16	<p>Objective & Policy: Expects heavy and resource-based industries to minimize impacts on surrounding land use, while ensuring and contributing to the quality of life and residents and the natural environment.</p>

		APC Chair: Not in Mill Bay plan. CVRD: Applies to those areas with heavy and resource-based industries.
Marine 3.1.7.4.11	Objective & Policy: Generally does not support expansion of marina facilities in order to preserve both the environmental and the scenic qualities of sheltered areas.	
	APC Chair: Generally does not support, but there may be instances where acceptable.	
Industrial 3.1.4.1.3	Objective & Policy: Encourage buildings of a scale and design acceptable to the regional district and the development of industrial and commercial infrastructure that is well integrated with adjacent rural and residential use through buffering, low-impact lighting and the maintenance of view planes and transportation access.	
	APC Chair: Not in Mill Bay CVRD: 2% of area A is Industrial and 0.7 % is Commercial. 0.4% Commercial in the Village Area and 0 % Industrial in the Village Area.	
Industrial 3.1.4.1.4	Objective & Policy: Encourage business activities and processes that maximize the conservation of resources and efficient energy use.	
	APC Chair: Not in Mill Bay. CVRD: “Encourage” is not mandatory.	
Temporary Use Permit (TUP)	APC Chair: Not appropriate in Mill Bay. CVRD: TUPs determined by the Board.	
Buffers & Large Lots	Objective & Policy: The Regional District will also seek to reduce residential and commercial impacts on agricultural activities through the appropriate use of buffers, large lots and the setback of structures on the non-agricultural areas.	
	APC Chair: Not appropriate in Mill Bay. CVRD: Area A has 14.7% of the plan area designated Agriculture. 9% of the plan area is in the ALR. 0% in the village.	
3.1.2.2.3	Objective & Policy: Supports all types of crop and livestock-based agricultural activities on agricultural lands.	

		<p>APC Chair: Not appropriate in Mill Bay.</p> <p>CVRD: Area A has 14.7% of the plan area designated Agriculture. 9% of the plan area is in the ALR. 0 % in the village.</p>
	<p>3.1.2.2.10 0.8 ha</p>	<p>Objective & Policy: Does not support any requests for subdivision of ALR land unless the new parcel is 0.8 ha (2 ac.) or less in size and is sited on soils having an agricultural capability rating of class 4 or higher as noted in the Land Capability Classification.</p> <p>APC Chair: Smaller lots = more affordable.</p>
	<p>Agriculture designation 1-6</p>	<p>APC Chair: n/a to Mill Bay.</p> <p>CVRD: Area A has 14.7% of the plan area designated Agriculture. 9% of the plan area is in the ALR.</p>
	<p>General Submission from Area A APC Local Plan</p>	
	<p>Vision</p>	<p>Use of a Template Approach: Key concepts in the current plan are not easy to find in the RLAP. It appears that a master LAP template was prepared and the plan content for areas A, B and C has been made to fit the template. Many of the key Vision and Policy statements have been buried in the revised text. For example, in the current plan Vision Statement and Goals (page 10 of Mill Bay Village Plan) 'Goal A' is buried in the revised plan as a future development objective on page 28. The importance of this concept and others presented in the original vision must be retained and presented as the vision. The new LAP vision is generic and could apply to any community, anywhere in Canada.</p> <p>November 2020: There continues to be evidence of the above. Although this harmonization document is only a temporary place holder, vigilance will be required by APC that key concepts aren't lost in the modernization documents.</p> <p>Policies in the current text have also been dispersed to fit the template and have been condensed. However, the dispersal and condensing may not always be caught in subsequent documents e.g., the elements of the Streetscape Beautification Plan (page 11) are specific requirements that need to be included in some document but we don't yet know where to find it. November 2020: Still a concern.</p>

		<p>Access to the waterfront is another key concept of the Mill Bay Plan and yet you need to get all the way to page 57 of the OCP to find a mention of beach access. Is it reasonable to ask area A residents to hunt through multiple documents to find core vision concepts?</p> <p>November 2020: Needs to be strengthened even more.</p> <p>Page 1, Vision: There should be a vision statement specific to area A like there is in the current plan.</p> <p>November 2020: Vision statement added although there are no goals as promised in the heading.</p> <p>CVRD: The harmonization is intended to be a transition to the modernization and provide the basis to build.</p> <p>Page 162 South Cowichan OCP – Building Design Guidelines 24.4.3 A Building Design Guidelines The Building Design Guidelines apply to commercial, industrial and multiple-family residential development and their accessory buildings and structures.</p> <p>page 162 – 199</p> <p>https://www.cvr.bc.ca/DocumentCenter/View/7621/3510-SouthCowichan-OCP</p> <p>Village Plan Policy 3.4</p> <p>In local plan</p> <p>Mill Bay Village, with its marine environment and exquisite ocean views, is one of the most desirable marine communities on Vancouver Island, and will improve waterfront access, revitalize its commercial areas and provide for <u>a street beautification local plan</u> that will accentuate its beauty and accommodate a variety of open space parks and trails. South Cowichan celebrates the unique heritage values of Mill Bay/Malahat, Shawnigan Lake and Cobble Hill.</p> <p>Form and Character DPA includes street beautification.</p> <p>CVRD:</p>
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		<p>The vision statement in the LAP is the same as South Cowichan OCP.</p> <p>THE HOCP draft vision: The vision statement in the Cowichan Valley Regional District (CVRD) official community plan (OCP) describes the Cowichan Valley as the regional board imagines it in the year 2050:</p> <p><i>The Cowichan Valley in 2050 enjoys a vibrant, diverse and sustainable economy, natural environment and society in a resilient community that has adapted effectively to climatic, technological and other change.</i></p> <p>LAP draft vision:</p> <p><i>The South Cowichan is a place of extraordinary beauty and unique socio-economic, cultural and environmental significance, where residents wish to retain the rural character, plan for sustainable village communities, and protect their quality of life and natural environment.</i></p> <p>Mill Bay Village, with its marine environment and exquisite ocean views, is one of the most desirable marine communities on Vancouver Island, and will improve waterfront access, revitalize its commercial areas and provide for a street beautification local plan that will accentuate its beauty and accommodate a variety of open space parks and trails. South Cowichan celebrates the unique heritage values of Mill Bay/Malahat, Shawnigan Lake and Cobble Hill.</p> <p>South Cowichan current OCP</p> <p>The Plan is consistent with the vision of the CVRD Corporate Strategic Plan which states: “The Cowichan Region celebrates diversity and will be the most livable and healthy community in Canada.”</p> <p><u>VISION STATEMENT</u></p> <p>The South Cowichan is a place of extraordinary beauty and unique socio-economic, cultural and environmental significance, where residents wish to retain the rural character, plan for sustainable village communities, and protect their quality of life and natural environment.</p>
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	<p>Jurisdiction – Matters outside jurisdiction must be objectives and use the word ‘considers’</p>	<p>Deferring to Other Levels of Government: Active statements in the current community plan have become passive in the RLAP: CVRD staff have presented that CVRD can’t tell other levels of government what to do. As an example, on page 11 of the existing plan, Policy 3.3 is in an active voice “... Waste Management Plan will be amended to ensure ...”, while in the RLAP “...encourage...” other levels of government is passive. This could be changed to “...will work with responsible government agencies to ensure...” which states CVRD directors will use the plan to push ahead this and other initiatives requiring other government/jurisdictional support. That written guidance to politicians is helpful.</p> <p>November 2020: Some sections incorporate the change to active statement and others don’t, which is evidence different writers have not harmonized their approaches.</p> <p>CVRD:</p> <ul style="list-style-type: none"> • Regulations belong in regulatory bylaws rather than the OCP. • Policies are distinguished from regulations as higher-level statements. • <i>Local Government Act</i> (LGA): “an official community plan is a statement of objectives and policies to guide decisions on planning and land use management.” • Level of detail affects application of consistency rule: more detail = less flexibility in interpretation of OCP.
	<p>New Sections and Designations?</p>	<p>APC: New sections have been added to the RLAP that are not in the existing plan. It is difficult to ignore these new additions, and it is felt commenting on them is therefore required.</p> <p>In addition, some existing sections have been modernized at a fundamental level, which also requires review and comment e.g. residential designations have increased from three in the current local plan to eight in the RLAP. While there may not be a disagreement, one is left to question why eight and not six or ten? Other examples include changes to commercial designations; adding designations such as marine, forestry (which read almost the same as the sections in the revised OCP). Why do this now and not in the modernization stages?</p> <p>November 2020: New sections have been added and improved as was promised. It would help if Ken looked at the sections on Forestry and Archie on the Servicing and Infrastructure, based on their respective expertise.)</p> <p>Finally, if the essence of the harmonization goal is to eliminate repetition and to structure for consistency throughout, the OCP must be relied on for the common elements and themes. The local area plans can then be specifically fine tuned and relevant to the individual communities for vision, goals, etc. Clarity is important, as is conciseness.</p>

		<p>November 2020: There continues to be a lack of format logic in the documents. Section titles introduce terms such as 'goals' and then don't articulate any goals e.g page 3 of OCP and page 1 of the LAP.</p> <p>CVRD: The information is reorganized but it is not new. Rural Resource was re-named Renewable Resource - Forestry to be consistent with the OCP. While some designations have been moved around within the plan, no designations have been added.</p> <p>Residential Designations:</p> <ul style="list-style-type: none"> • Village Residential • Multi-Family Residential • Manufactured Home Park • Stonebridge Comprehensive Development (moved into residential section) • Mixed-Use Comprehensive (moved into residential section) • (Ocean Terrace) Comprehensive (moved into residential section) • Future Land Use (moved into residential section) <p>Rural Residential designation (moved into the area A local plan from the South Cowichan Rural OCP as designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan.)</p> <p>Many of the goal statements in the LAPs were objectives. The goals are consistent in the harmonization for consistency between documents. In the modernization, goals for neighbourhood plans will be developed, and they will be consistent with the regional plan. Multiple goals that conflict are a challenge.</p>
	School & Park Names	<p>APC: Some sections transposed have errors as things have changed since the plan was adopted. For example, school names have changed, and new parks have been created. If the intent is to provide that detail, we need to get them right. A question posed is whether we need that detail in a plan (school names) as any change procedural should trigger a LAP amendment, even if its only a text change. Do we want that hassle?</p> <p>November 2020: A more thorough presentation of information is evident, and I assume this added info is correct.</p>

		<p>CVRD: Replace Mill Bay Elementary School (page 3) and Ecole Mill Bay (page 6) with Mill Bay Nature School.</p>
	First Nations	<p>APC: The existing village plan has too much discussion on non-First Nations' history and culture and almost none on the major influencer and historical partner, the Malahat nation. This needs to be corrected by judicious editing of these four pages or moving all that discussion to an appendix section. November 2020: I note First Nation history has been added and the non-First Nations history has been reduced in volume as we suggested.</p> <p>CVRD: While the South Cowichan refers to Malahat First nations lands (50 times) as does the Mill Bay Village Plan (18 times) there is not currently a lot of content on the Malahat First Nation as a major influencer and historical partner.</p> <p>South Cowichan</p> <p>Lands within the plan area are within the traditional territory of the Coast Salish nations that used the area for settlement purposes as well as for camping, fishing and gathering, including the Cowichan, Tsawout, Malahat, Penelakut, Pauquachin, Tsartlip and others. These First Nations continue to take a strong interest in their traditional territory and have members residing within and adjoining the plan area.</p> <p>Village Plan</p> <p>The first people to inhabit the Mill Bay area were the Coast Salish nations of Malahat, Cowichan, Tsawout, Tsartlip, Pauquachin and others, who used the area for settlement purposes as well as for camping, fishing and gathering. Lands within the village area are within the traditional territory of the First Nation bands that originally inhabited this area. The Malahat First Nation Reserve continues to be an active settlement in the area that adjoins Mill Bay Village. The Cowichan Tribes continue to take an interest in their traditional territory and have members residing in the village area.</p> <p>Over the long term, increased public access to the Saanich Inlet will be achieved. As Mill Bay shares the shoreline with the Malahat nation, the CVRD will work co-operatively with the Malahat nation toward future waterfront access.</p>

		<p>The LAP currently has 19 references to Malahat lands and this content:</p> <p>Lands within the local plan area are within the traditional territory of several Coast Salish nations, including the Cowichan, Tsawout, Malahat, Pauquachin and Tsartlip nations. The Malahat, Pauquachin and Cowichan First Nations have members residing within and adjoining the local plan area. Today, the Cowichan Tribes are also one of the largest single employers in the region.</p> <p>The first people to inhabit the Mill Bay area were the Coast Salish nations of Malahat, Cowichan, Tsawout, Tsartlip, Pauquachin and others who used the area for settlement purposes as well as for camping, fishing and gathering. Lands within the village area are within the traditional territory of the First Nations bands that originally inhabited this area. The Malahat First Nation reserve continues to be an active settlement in the area that adjoins Mill Bay Village. The Cowichan Tribes continue to take an interest in their traditional territory and have members residing in the village area.</p>
	Introduction	<p>APC: Page 1 & 2 – Introduction: There is no Introduction in the revised plan. Without something as basic as a location/context map the discussion is difficult to follow. Most of the text has been dispersed in main body of RLAP.</p> <p>Page 2, Purpose: There is reference in the last line on this page of the RLAP to the community growing in a way that reflects the community's core values. These core values should be articulated, or the statement taken out. At the top of page 3, the same applies to 'local settlement issues'. What are they? When detailed there will likely be differences between the three RLAPs.</p> <p>Page 3, Commuting Lifestyle: The paragraph focuses on less commuter traffic. That's okay, but it excludes aspiration to more/better transit. It also ignores autonomous vehicles, a mode likely in the mid to long term that could include sharing of vehicles (i.e., cars will continue to exist but be used more effectively.)</p> <p>November 2020: No change.</p> <p>CVRD: There are several (17) new maps attached to the area A Plan. Purpose and commuting lifestyle will be reviewed in the modernization.</p>
		<p>APC: Pages 3-6 Mill Bay Yesterday and Today: Text has been included and expanded in the RLAP. There needs to be balance in this discussion, including the presence and role of the Malahat nation (and others). There is no evidence that the Malahat nation has been asked to collaborate so that any history accurately reflects all points of view. This is in keeping with the</p>

		<p>goal of including First Nations in our community. In my opinion, this is still a deficiency, although there are more references to First Nations in the planning cycles.</p> <p>Pages 4-6, Character past and present: While interesting, does little to show why its an important driver of the revised plan. It can be placed in an appendix. Regardless of its location, it excludes aboriginal history and future influences on the RLAP. This needs work.</p> <p>November 2020: Still needs work.</p> <p>Pages 7-9, Heritage: As the Heritage policies are weak (page 33) this text can be reassigned to an appendix. At this point, Heritage does not seem to be a plan driver. As above, First Nations history is absent and needs to be addressed.</p> <p>November 2020: A few paragraphs have been added.</p> <p>CVRD: Reviewed and Updated</p>
		<p>APC: Page 7 - 9 – Mill Bay Tomorrow: This section is not included in the LAP, although there is some non-numerical carry-over in Regional Plan (RP) land use designation and development objectives. There appears to be a missed opportunity to explain the projected demographics for the area, which are critical to understanding the future plan. Numbers are intended to be in a separate regional level document with an area A section, but as a minimum, readers of the RLAP need to know if the future is 'newly weds and nearly deads' or an area of economic growth attracting intraprovincial, national and international in-migration.</p> <p>November 2020: More dialogue on the desire for economic growth is evident, and there is mention of in-migration role. We should expect more discussion in the modernized plan as in-migration is the key to national, provincial and local population growth.</p> <p>CVRD: Reviewed and updated</p>
	Vision	<p>APC: Page 10 – Vision: Vision statement has been replaced with a generic aspiration that requires customization. This probably should have been part of the modernization exercise. There is nothing in current plan on climate change, reliance on inexpensive fossil fuels, et al so why is the RLAP inserting it in the harmonization?</p> <p>November 2020: This remains in the document. I don't think it hurts it, but it is new relative to the plan in place.</p> <p>The vision in the existing plan is on point albeit not all statements are typically appropriate in a vision. Transpose the ones that reflect the core community values.</p> <p>CVRD: See previous comments.</p>
		APC:

		<p>Page 11: Policies – Current policies have been condensed, perhaps because they don't read as policies, and dispersed to follow the template for harmonization. November 2020: No improvement although there has been reorganization within the revised text.</p> <ul style="list-style-type: none"> ○ Policy 3.1, Mill Bay Village – Moved to an objective in the RLAP. ○ Policy 3.2, Waterfront Access – Moved to future development objectives in LAP. ○ Policy 3.3, Liquid Waste Management – Moved to 'goals'. ○ Policy 3.4, Streetscape Beautification – Not transposed and likely shouldn't be, but needs to be in some other document. A more general statement on the requirement of integrated good urban design could be a policy statement. ○ Policy 3.5, Amenity Zoning – Probably a land use bylaw/zoning topic, although policy that we are flexible to achieve RLAP goals could be included. ○ Policy 3.6, Implement Zoning Bylaw – No need to transpose this as it is in the <i>Act</i> and not a local plan policy. ○ Policy 3.7 & 3.8, Containment Boundary – A separate topic in RLAP and maybe modernized. <p>CVRD: Policy 3.4, Streetscape Beautification in Form and Character Development Permit Policy 3.5, Amenity Zoning – See OCP</p> <p>The OCP does not include amenity policies. As amenity needs may differ from area to area, that detail is left to the local plans to express in the sections that deal with the density policies for the zones in which the <i>Local Government Act</i> section 482 powers will be used.</p>
	Land Use Designations	<p>CVRD: The designations in the area A local plan do not overlap geographically and the objectives/policies are unique to each designation.</p> <p>While some designations have been moved around within the plan, no designations have been added in this section.</p> <p>The following designations have been moved into the area A local plan from the South Cowichan Rural OCP as designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan.</p> <p>Renewable Resource Agriculture and Rural Resource have been renamed Renewable Resources – Agriculture and Renewable Resources – Forestry, respectively, in the area A local plan.</p>

		<p>Marine Previously called Marine Conservation and renamed to Marine in area A local plan.</p> <p>Freshwater Previously called Water Conservation and renamed to Freshwater in area A local plan. All named lakes from the Provincial Freshwater Atlas dataset are now covered by this designation.</p>
	Residential Designations	<p>APC: Page 13 thru 18 – Residential Designations, Objectives and Policies – This text is a totally re-written and reformatted in the RLAP. The RLAP also adds several residential designations, which should have been introduced during the modernization stage. November 2020: Continued in the revision as in the first draft.</p> <p>Page 12, Part 2 – Land Use Designations – New designations have been added that aren't in the current plan (e.g., Renewable Resources, Marine, Freshwater etc.) This is likely due to the catch-all nature of using a universal template or an early attempt to modernize. The write-ups are regional in nature (page 13 marine, as an example) and should be customized to area A or left in the regional plan only. In this revision, staff are introducing 'modernization concepts' which is okay, but it is confusing at this point of harmonization.</p> <p>APC: Page 15 & 16, Residential Policies – Many of the current policies are not policies but are regulations and quite rightly have not been transposed (i.e., they have been deleted or moved to another document.) New policy (that is incomplete) has been added, perhaps as place holders, in the RLAP.</p> <p>CVRD: See Zoning Tracker. November 2020: Continued in the revision as in the first draft.</p> <p>Page 25, Residential designation – Increases designations from 5 to 8 (see our previous comment in Section 2). It is further noted that densification occurs now without policy and supporting regulation as suites and small 'outbuildings' are constructed. The RLAP needs to address, as well, policy that dictates lot size and configuration based on local characteristics and constraints. This includes accommodating parking and other densification implications. November 2020: Not yet addressed.</p> <p>Page 27, General Residential Policies and Objectives – This is where objectives and policies specific to area A need to be addressed (e.g., density/densification; no net loss development; housing mix; affordability, etc.)</p>

		<p>Page 27, Section 2.9.3 – This is called Comprehensive Development Objectives, and all the objectives are soft (e.g., ‘encourage’). A better objective could be ‘work with the Ministry to identify and implement required access routing for safe and efficient traffic movement’.</p> <p>APC: Page 17, Multi-family – Nothing has been transposed to the RLAP. What is currently labelled Policy in the current plan is not policy. Text has either been deleted or relocated to another document. New text will likely be added during modernization write-up.</p> <p>November 2020: Continued in the revision as in the first draft.</p> <p>APC: Page 25-27, Ocean Terrace – Nothing is transposed. The land mass still exists under different ownership. Its absence should be noted in the RLAP as relevant information.</p> <p>CVRD: See zoning tracker (in the portal)</p> <p>The designation is referred to as Ocean Terrace Comprehensive Development (CD) in the Mill Bay Village Plan text but was called Comprehensive Development (CD) on the map that was adopted with the Mill Bay Village Plan. Staff used Comprehensive Development in the area A local area plan; however, we can change it to Ocean Terrace Comprehensive Development if that is preferred.</p> <p>APC: Page 28-32 Stonebridge Terrace – The four pages in the current plan have been condensed to one, with a reference that Stonebridge will be subject to modernization in the next stage.</p> <p>November 2020: Continued in the revision as in the first draft.</p> <p>CVRD: See Zoning Tracker</p> <p>APC: Page 29, section 2.9.17: Policy 1 should define affordable housing or reference a clear definition elsewhere in the document.</p> <p>November 2020: References to CMHC 30% of gross income as affordable guideline. This defines affordability of the household and not what is affordable housing. If household has an annual income of \$50k, CMHC guideline offers that the monthly payment for accommodation is \$1250. What housing is available for that affordability?</p> <p>CVRD: This type of content will be included in modernization, informed by the recently completed (January 2021) Housing Needs Assessment.</p> <p>APC: Page 33, Mixed Use Comprehensive – This has been transposed and condensed. The text in the current plan is more explanatory/descriptive than that in the RLAP. A few of the policies are more regulations than policies and should be reworded or removed.</p>
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	<p>Growth Containment Boundary</p>	<p>Page 16, Growth Containment Boundary – This section currently does not exist in the village plan, so is it a modernization of the plan? In this section, there is reference to five designations, and on page 25 in a similar discussion it references eight. We take it that is proposed in the modernization stage, but we need clarity on all new proposals. November 2020: Still need clarity.</p> <p>Page 17, Growth Containment Objectives – ‘Consider’ is not a word typically associated with ‘objective’. It weakens the action stated in the original plan, too. Objectives must be measurable, not aspirational; otherwise, how does the Regional Board realize success? That also means there is a baseline from which to measure. Are 100 dairies to many or to few? The objective states opportunities should be provided: it needs a context. November 2020: Objectives still not measurable.</p> <p>APC: Page 30, Settlement Nodes – Deferred to modernization stage. November 2020: Table 3.1 in the OCP introduces settlement nodes via typology. It makes sense to planners as it sits, but I offer that it is poorly introduced with regards to purpose and benefits of use to the CVRD. Is Mill Bay Centre a higher order commercial centre than Cobble Hill Centre?</p> <p>CVRD: Settlement nodes existed in some OCPs and were carried over to harmonization. It is an organizational framework and will be transitioned over to the OCP.</p> <p><u>Growth Containment</u> The growth containment boundary (GCB) is the village containment boundary (VCB) and explained in the OCP and Table 1-2 Relationship of the OCP with other CVRD planning processes. In some OCPs the VCB was referred to as a GCB. The harmonization refers to all growth containment boundaries as GCBs. The OCP also highlights the need to review in the modernization.</p> <p>The crux of the OCP growth management policy challenge, therefore, is to effectively redefine the growth containment boundary and align it with service provision so that the GCB serves to manage and direct growth as the land use planning tool it is intended to be. A regional growth strategy would strengthen this through a regional planning lens, ensuring any changes to the GCB were changed by regional consent aligned with good planning principles. The need to manage growth, guide urbanization and adjust for an aging population will continue for the foreseeable future.</p> <p>Also see Our Communities</p>
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	Manufactured Home Parks	<p>APC: Page 18, Manufactured Home Parks – Parts of Policy 4.3.4 have been retained, but the rest has been deleted or relocated to another document as noted above. November 2020: Continued in the revision as in the first draft.</p> <p>Page 29, Section 2.9.10: Policy 1 is meaningless without context (i.e., How does the board ensure tenancy for dislocated tenants? Does the board want to provide temporary holding areas for dislocated residents? Does the board want to spend its time fighting landowners wanting to improve their lands?)</p> <p>CVRD: In most OCPs there was content that was <i>ultra vires</i>. All LAPs now have the same policy, and the procedures bylaw will be amended <u>to stay within Regional District jurisdiction</u> to require information to be provided rather than stipulating what the applicant must commit to do. I would rewrite what is set out below something like this:</p> <p>An applicant for a zoning amendment for land that is occupied by a manufactured home park, that would allow the manufactured home park to be replaced with another form of residential development, must provide the following information with the application:</p> <ul style="list-style-type: none"> • Information on the number of tenant households that would be displaced • Information on the average cost of housing units in the proposed development, compared with the average cost of a tenancy in the manufactured home park • Information on arrangements that the owner proposes to make with residents of the manufactured home park upon redevelopment of the land and the extent of resident acceptance of such arrangements, including any of the following if applicable: <ul style="list-style-type: none"> ○ Rights to purchase or rent housing units in the new development, and interim living arrangements

		<ul style="list-style-type: none"> ○ Relocation of manufactured homes to other manufactured home parks at the applicant's cost ○ Compensation of residents who will not be accommodated in the new development or relocated to another manufactured home park, including compensation for the value of manufactured homes that cannot be relocated and payment of the cost of disposing of such units.
	Commercial	<p><u>Commercial</u> The following designations have been moved into the area A local plan from the South Cowichan Rural OCP as designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan:</p> <ul style="list-style-type: none"> • General Commercial • Highway Commercial <p>APC: Page 20, Commercial Objectives – The current plan objectives are sound with minor tweaking, but they were not transposed. Instead, policy proposals were inserted that should have probably waited until modernization stage. November 2020: Continued in the revision as in the first draft.</p> <p>APC: Page 21, Village Commercial Policies – Current plan policies were either reworded in the RLAP or deleted/relocated to another document. Some of the deletions/relocations were of regulatory types of statements e.g., "...must be in compliance with <i>BC Liquor Control and Licensing Act...</i>" which don't need to be in such a document.</p> <p>Page 23, Commercial Designation – In the first paragraph, should it read "accommodate" new commercial areas rather than create them? Unless the Region is going to be a developer it won't be "creating". If the reference is intended to designate more land, "create" is also the wrong word in this context.</p> <p>APC: Page 22, Service Commercial Designations & Policies – Only the intent was carried over (reworded), and the rest of the text was deleted. There was little offered as replacement, i.e., no proposed modernization text, just filler/place holder material.</p> <p>Page 23, Commercial – This suggests more commercial outside the growth containment area. Is this in conflict with the objective of revitalizing existing commercial?</p> <p>APC: Page 23, Tourist Commercial – Intent of this designation was transposed but several of the policies were not transposed, while others were reworded to make them read less like regulations.</p> <p>November 2020: Continued in the revision as in the first draft.</p>

		<p>Page 23 & 24, Tourism Commercial – This section needs clarity. Is this for private uses/operators? Does this include golf courses, marine rentals, motels, B&Bs, farm stands, artisanal studios, etc. or are these uses in other designations?</p> <p>Page 25, Tourist Policies – The Regional Board needs to establish whether a surrounding view is impacted. What are the criteria and supporting rules? The existing plan has a more specific height defined. Establishing view corridors may be something board could direct staff to do and local plans would reflect these corridors and define how to protect them.</p> <p>Page 29, Section 2.9.17: Policy 2 seems to be overlapping with the Tourism Commercial designation discussion earlier on.</p> <p>CVRD: Text and designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan. As there were no Marine designations specifically in the Mill Bay Village Plan, these policies are harmonized as they were written in the South Cowichan Rural OCP.</p> <p>The designation content requires review as part of the modernization. See zoning tracker for clarification on removal of some redundancies. Generally, it is the scope of the zoning bylaw to specify uses.</p> <p>Replace the Village Commercial designation description (Section 2.8) with:</p> <p style="padding-left: 40px;">The Village Commercial designation supports a diverse range of commercial uses, primarily in three nodes along the Trans-Canada Highway—Frayne Centre, Mill Bay Centre and Pioneer Square—including but not limited to retail outlets, doctors' offices, banks/credit unions, restaurants, coffee shops, museums, offices and boutiques. All commercial uses permitted in the village area should be compatible with surrounding residential and agricultural areas.</p>
	Renewable Resources	<p>Page 18 Renewable Resources: Much of this text does not exist in the current plan and probably does not belong in the revised local plan. It pertains to regional, provincial and private jurisdictions and should be in the regional plan if anywhere. One paragraph in the RLAP saying that the regional plan should be referenced on these topics is sufficient.</p> <p>CVRD:</p> <p>Most of the text comes from the South Cowichan Rural OCP and is therefore included in the area A local plan.</p> <p>Text and designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan.</p>

	Industrial	<p>Page 19, Industrial Policies: Are these policies specific (in a harmonized way) to area A? It doesn't read that way.</p> <p>CVRD: Text and designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan. Because there were no Industrial designations specifically in the Mill Bay Village Plan, these policies are harmonized as they were written in the South Cowichan Rural OCP.</p>
	Agriculture	<p>APC: Page 35, Village Agriculture – This has been moved to a new section of the RLAP on page 17 of that document where Renewable Resources specific to agriculture are discussed. This is a new section, and the transposition needs to be smoother.</p> <p>CVRD: Village Agriculture belongs in the Renewable Resources – Agriculture section as it is an agricultural designation and should be considered with the rural Renewable Resource – Agriculture designation in area A.</p>
	Parks & Institutional	<p>APC: There are quite a few more parks in area A than what has been listed in the area A local plan, in and out of the Mill Bay Village. While the focus of this exercise in harmonizing plans has been on land use, are we sure that our plans are harmonized with other guiding documents, such as the Parks Master Plan? What is our approach to synchronizing the local area plan with other initiatives by internal and external groups?</p> <p>Pages 36-41, Parks and Institutional Designation – This section has been split into two parts, a) Institutional and b) Parks. It has been truncated and rewritten and some elements have been relocated to elsewhere in the LAP e.g., increase public access to shoreline. Policies in the current plan have been deferred to the modernization stage, and therefore we don't know what will be retained. We assume it will be a re-write as current plan policies aren't all policy statements. Policies should be consistent with Parks Master Plan policies. November 2020: Continued in the revision as in the first draft. Naming/listing existing parks needs to be reconsidered as new parks will be developed and new names will need to be added via amendment. Do staff and the directors really want the hassle of amending the LAP and the process such an activity requires? If you choose to list the existing and future parks, we note some are missing in your proposed list.</p> <p>Pages 20 & 21 – In the revised document, Institutional and Parks are separate designations, yet recreation seems to be referenced in both designations. I think that recreation needs one</p>

		<p>home designation, or the RP could be confusing in use. There is a need to define jargon, such as “social infrastructure”, ‘community services’, ‘social sustainability’ etc., in these sections so it is clear to the public and directors. In my head, social infrastructure means churches, care facilities, cemeteries, schools, etc., that support the day-to-day living of the citizens. You have some definitions in the revised OCP. Should a glossary be considered?</p> <p>Page 20 & 21, Parks – We assume staff has referred to the current Parks Master Plan on area A for this section. Documents such as the Parks Master Plan need to be harmonized and modernized as part of this effort. Are there are only five objectives in that Parks Master Plan, and those have been transposed as indicated on page 21 of the LAP?</p> <p>CVRD: Full list of all parks in the next version of the area A local area plan. Where appropriate, will separate references in version three of the area A local area plan. The OCP states that the LAPs are consistent with the Parks Master Plans, which will require amendments when the OCP is adopted, as the Parks Master Plans include current OCP policies.</p> <p>The names of the parks listed are all correct, with the exception of Mill Springs Trail, which is actually named Mill Springs Park.</p> <p>The current Parks Master Plans cite specific OCP policies and will require amendment.</p> <p>The definitions will be included in the zoning bylaw. The zoning bylaw as a regulatory bylaw is where definitions reside.</p>
	Development Permit Areas	<p>APC: Pages 42-69, Development Permit Area – These sections have not been transposed and are to be dealt with later this year.</p>
	Marine	<p>APC: Page 22, Marine Designation – This text pertains to the region. It should be customized to area A.</p> <p>CVRD: Text and designations from the Mill Bay Village Plan as well as the South Cowichan Rural OCP (within area A) are included in the area A local plan. As there were no Marine designations specifically in the Mill Bay Village Plan, these policies are harmonized as they were written in the South Cowichan Rural OCP.</p> <p><u>Please note the following from the LAP:</u> Marine Designation</p> <p>The Marine designation is intended to protect marine ecosystems, wildlife habitat and species.</p>

		<u>A marine area local plan for electoral areas A, C, D, F, G and H will be fully considered in the modernization as a separate local plan with robust objectives and policies for electoral areas with marine areas.</u>
	Home-based Businesses	<p>APC: No page, home businesses: There should be a section on home businesses, which are thriving. Not recognizing them in a local plan will cause problems down the road. A statement exists in the current plan, although it reads as a regulation. November 2020: Passing reference to home business in discussion on commercial. I challenge that home businesses come in all shapes and sizes and need more elaboration in their own section.</p> <p>CVRD: In general, the OCP can support home-based businesses and provide general objectives and policies, which can be developed in the modernization.</p> <p>There exists some language in the OCP 3.3.8 Commercial designation – increase home business activity due to the changing nature of the workplace and information technology.</p> <p>The area A/C zoning bylaw section 4.10 has home-based business regulations and generally home-based business regulations are located in zoning bylaws.</p> <p>The South Cowichan OCP has some direction for area A on home-based business, such as the following (which are already implemented in the zoning bylaw): The implementing zoning bylaw will allow for a home occupation, accessory to a single-family dwelling, on a parcel within the Rural Resource designation (RUR). The implementing zoning bylaw will allow for a home occupation on a parcel within the River Corridor Residential designation (RC), where a principal single-family dwelling is located, provided that the home occupation use is in keeping with the residential character of adjacent residential areas. Uses that may be unsightly or create a nuisance by noise, dust and odour will be prohibited.</p> <p>The draft LAP includes the following mention of home-based businesses in the Agriculture designation, but the South Cowichan OCP home-based policies for the most part are already implemented in the area A/C zoning bylaw.</p> <p>LAP home-based business content.</p>

		<p>The Agriculture designation is also intended to support the agricultural sector by accommodating supplemental employment opportunities, home-based businesses and value-added opportunities to maintain the viability of farm businesses.</p>
	Railway	<p>APC: Page 30, Railway Transportation Designation – No transposed text and objectives and policies have been deferred to modernization stage.</p> <p>CVRD: There is transposed text in the LAP as follows –</p> <p>Later arrivals to the area included workers from China, India and Japan, who came to work in the logging and mining camps and to help build the Esquimalt & Nanaimo Railway (E&N Railway). Built by coal baron Robert Dunsmuir, the railway connected the region to Victoria. Prime Minister John A. Macdonald drove the last railway spike of the E&N Railway on the east side of Shawnigan Lake at Cliffside, during his only visit to British Columbia.</p> <p>With the completion of the railway, Shawnigan Lake and Cobble Hill grew into resort destinations for Victoria residents, and with road improvements Mill Bay also became popular. Cottages were built along the shorelines of Shawnigan Lake and Saanich Inlet. Hotels were built in all three village areas for weekend and summer holiday-makers. While these hotels no longer exist, many historic cottages remain, and the South Cowichan area is still a popular recreation destination for Victoria and Nanaimo-area residents and other mid-Island residents.</p> <p>Before 1886, a trip to Victoria meant going to Cowichan Bay by horse and buggy, on horseback or bicycle, or walking, then taking a boat from Cowichan Bay to Victoria. After the E&N Railway was built, it became more common to take the train. After 1911, when the Malahat Road was opened, one could take a perilous journey by car on a narrow and winding gravel surface. The Last Spike Stone Cairn is a six-foot-tall stone cairn embossed with two plaques. It is located on the old Cliffside Station site of the E&N Railway, at the top of Cliffside Road in Shawnigan Lake. The historic site</p> <div data-bbox="1161 695 1829 967" data-label="Image"> </div> <p><i>The E&N Railway was long the backbone of the area's transportation network. Pictured is the 'Duchess' locomotive near Cobble Hill (ca. 1890) and Shawnigan Lake as seen from the track (ca. 1890)</i> <i>Source: BC Archives</i></p>

		<p>includes the stone cairn, the railroad section where the last spike was driven and the land the site is located on.</p> <p>Under 2.3 Renewable Resource – Forestry They total about 53% of the area A land base and are designated in this local plan as Renewable Resource – Forestry. Unlike mainland B.C. forests, lands on southeastern Vancouver Island have a history of private ownership, beginning with the E&N Railway grant. In the 1880s, as part of its commitment to build the railway, the Province granted some two million acres between Sooke and Campbell River to the company charged with constructing the railway.</p> <p>2.10 Railway Transportation Designation</p> <p>Objectives and policies specific to the local area may be considered in the modernization.</p> <p>2.10.1 Railway Transportation Objectives</p> <p><i>To be considered in modernization.</i></p>
	Roads and Servicing	<p>APC: Page 30 & 31, Roads and Servicing – This appears to be a hodgepodge of road improvement needs that would fit in a Transportation Five-year Plan or in a Capital Budget Request. Objectives 2-4 read more like policy. Modernization needs to be much more attentive to Roads and Servicing policies with attention paid to the community’s vision of walkways, cycling, view corridors and public access to the oceanfront. These policies, more than development concepts, guide future development. If there is an area A water issue, why are we looking at another 1500-2500 units being developed? (form follows function). November 2020: Still refers to Mill Bay as having water supply for single-family development, but I guess only parts of the local area plan are being modernized during harmonization.</p> <p>CVRD: Reminder that the Province has jurisdiction over most roads; hence, OCP policies on roads have been reworded as objectives.</p> <p>Roads and Services Objectives (Section 2.12.1) updated by removing reference to road upgrades outside of area A.</p>

		<p>The unit numbers were taken from existing area A OCP. These numbers will be updated during modernization with input from recently completed Housing Needs Assessment (January 2021).</p> <p>Most of the following is taken from the South Cowichan OCP</p> <p>Roads and Servicing</p> <p>Specific layout of subdivisions and the road connections within the subdivision are approved by the Provincial Approving Officer of the Ministry of Transportation and Infrastructure as each subdivision phase is approved.</p> <p>The transportation objectives and policies are intended to improve transportation and land use planning. A comprehensive transportation plan for areas A, B and C will be considered in the modernization.</p> <p>2.12.1 Roads and Servicing Objectives</p> <ol style="list-style-type: none"> 1. The Province is encouraged to find ways of improving the following unsatisfactory and potentially hazardous sections of road as follows: <ol style="list-style-type: none"> i. Pedestrian crossings along the Trans-Canada Highway need to be improved at Deloume, Shawnigan-Mill Bay and Frayne Roads. The problems could be reduced by providing an underpass at Lashburne Road or an overpass at Deloume Road or Shawnigan-Mill Bay Road. This is a safety priority, as most residences are east of the highway and schools to the west; ii. The intersection of East Shawnigan Lake Road and Recreation Road requires improvement. An extremely limited line of visibility at this intersection is caused by the E&N Railway embankment and overpass, and by a significant road gradient. Recreation Road is extensively used by the vacationing public towing trailers and boats. A future day use park now being planned will cause further congestion at this intersection; iii. The intersections where Filgate, Tath and Cameron-Taggart Roads intersect Cobble Hill-Shawnigan Lake and Shawnigan-Mill Bay Roads are on curves, producing a hazard. All intersections on Cobble Hill-Shawnigan Lake Road should have safe and clear lines of sight; iv. East Shawnigan Lake Road, between Lark Road and Dwight International School, has a number of acute curves and virtually no pedestrian or cycling areas (due to a high road bank and a ten-metre right-of-way abutting the roadway). These factors present a
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		<p>dangerous situation for pedestrian and non-motorized movement. Improvements to the shoulder portions are required;</p> <ul style="list-style-type: none"> v. At the intersection of Renfrew and McKean Roads, a potential congestion problem is likely to occur due to the expected increase in traffic volume. This intersection is the main access to a large residential subdivision and is adjacent to an elementary school; vi. The pedestrian routes from Mason's to Malta Road on the Cobble Hill-Shawnigan Lake Road and Shawnigan Village to 5 km past the village on Shawnigan/Mill Bay Road are ill-defined and a properly designed walkway is required in both cases; vii. Connection of Deloume Road between Mill Springs and points north is necessary; viii. On the Trans-Canada Highway, an advance left turn lane for south bound traffic onto Kilmalu Road is necessary to improve safety; and ix. On the Trans-Canada Highway, an advance left turn lane at Fisher Road, for both north and south bound traffic, would improve safety. <p>2. The Province is encouraged to name roads within the South Cowichan will reflect local identity and heritage and consult with local Historical Societies and the CVRD for recommendations.</p> <p>3. The Province is encouraged to ensure that heavy truck traffic utilizes alternate routes through major network roads rather than the more densely populated village areas.</p> <p>4. The Province is encouraged to implement the Major Road Network Plan, with roads classified according to the table below.</p>
Electoral Area B	HOCP Objective/Policy #	HOCP Objective & Policy/Comments
	Main OCP Marine Conservation Policy #9 3.1.7.3.9	<p>Objective & Policy: Limit new development along watercourses and the sea where ongoing erosion threatens stability.</p> <p>APC: Docks should conform to <i>Water Sustainability Act</i> and <i>Land Act</i>.</p> <p>CVRD: Docks are under the land use management jurisdiction of the local government in whose territory they are located. In the case of the marine area in the CVRD this engages the Islands Trust/CVRD boundary issue. Zoning bylaws can address whether these structures are permitted at all and how large they may be.</p> <p>Docks are also under the jurisdiction of the Province in regard to tenure, since the seabed below the natural boundary belongs to the Province and the bed of rivers and lakes generally belongs to the Province (some exceptions on Vancouver Island). This is why dock owners require licenses (though recently the Province has seen fit to issue a "general permission" for</p>

		<p>docks in specified areas that relieve upland owners from having to apply for a licence of occupation). See https://www2.gov.bc.ca/gov/content/industry/crown-land-water/crown-land/crown-land-uses/residential-uses/private-moorage. This regime is established under the <i>Land Act</i>.</p> <p>There may be circumstances where a dock established in fresh water (lake or river) would also engage the <i>Water Sustainability Act</i>, particularly with respect to “changes in and about a stream”.</p> <p>Some docks might also engage the jurisdiction of the federal coast guard if they are large enough to constitute a hazard to navigation; this would be rare.</p> <p>A statement in the OCP about docks conforming to other applicable laws is redundant.</p>
	2.3.2.2.4.	<p>Objective & Policy: Encourages buffering of commercial and industrial uses from adjacent rural and residential uses and the preservation of access and views from adjacent rural and residential uses.</p> <p>APC: Could allow residential above light commercial as affordable housing.</p> <p>CVRD: Local plan could add this in the modernization.</p>
	2.4.1.2.8	<p>Objective & Policy: Promote and support water conservation measures with residents, business owners and industry (e.g., xeriscaping, water audits).</p> <p>APC: Should apply to properties bringing in fill that creates hazards.</p> <p>CVRD: Could be considered as a development permit on water conservation.</p>
	2.5.1.2.10	<p>Objective & Policy: Continues co-operating with the Municipality of North Cowichan, City of Duncan, Cowichan Tribes and electoral areas D and E to manage the Joint Utilities Board treatment plant and seek innovative approaches to the long-term management and funding of the facility.</p> <p>APC: Is area B part of the JUB? How would area B be affected?</p> <p>CVRD: D and E are non-voting members of the JUB. It's the Duncan area sewer. Eagle Heights and Cowichan Bay service areas.</p>
	2.6.1.1	<p>Objectives:</p> <p>Strengthen the retention of agriculture and aquaculture operations.</p> <p>Protect groundwater as an important resource to support agriculture and aquaculture industries in locations where potential land use conflicts can be mitigated.</p>

		<p>APC: Is aquaculture wanted due to associated health concerns? Eliminate aquaculture especially in freshwater areas.</p> <p>CVRD: Aquaculture is currently in the area B zoning bylaw – APC Chair to address with Area B Director. Eliminate aquaculture in area B in the zoning bylaw modernization.</p> <p><u>Added</u> in the OCP: Review aquaculture objectives and policies. <u>Changed</u> Strengthen the retention of agriculture and aquaculture to: Strengthen the retention of agriculture.</p>
		<p>Objective & Policy: Diversify agricultural crops and aquaculture products reflecting climate change projections.</p>
		<p>CVRD: See OCP 3.1.2 and 2.6.1.1.7.</p>
		<p>Objective & Policy: Protect groundwater as an important resource to support agriculture and aquaculture industries in locations where potential land use conflicts can be mitigated.</p>
		<p>CVRD: See OCP 2.4.1.2.10 and 2.6.1.1.1.8 and General Development Policies.</p>
	2.7.1.1.8	<p>Objective & Policy: Foster stewardship of the land while encouraging sustainable economic development based on the region's natural resources.</p>
		<p>APC: Don't understand the connection between economic development and protection of sensitive ecosystems.</p>
		<p>CVRD: Preservation of natural environment and promoting economic development can co-exist without compromising one or the other if carefully planned.</p>
	2.7.1.1.9	<p>Objective & Policy: Work with other levels of government to ensure the provision of infrastructure that local industries and sectors require.</p>
		<p>APC: Keep economic growth strategies for individual areas to decide.</p>
		<p>CVRD: CVRD has a regional economic service; See OCP Goal 7: Realize the region's economic potential. Local plans can have objectives and policies; e.g., for Village Commercial.</p>
	2.12.2 local plan	<p>Objective & Policy: Processing activities that are directly related to mineral or aggregate extraction and that are temporary in nature, such as asphalt batch plants.</p>
		<p>APC: Should also contain clause from A in that "where such use may be demonstrated to have little or no effect on neighbouring residential uses of the natural environment."</p>

		<p>CVRD: Temporary Use Designation contains the following language: “Lands designated for temporary use permits are intended to ensure that temporary uses have a beneficial aspect for the community and have little or no negative effect upon residential uses or the natural environment.” However, whether a temporary use has “little effect” on neighbouring residential uses or the natural environment is a matter of opinion.</p>
	2.12.2	<p>Local area plan does not include this policy but there are objectives and policies in the OCP.</p>
		<p>APC: The regional board does not support servicing to lands outside village containment boundary.</p> <p>CVRD: See OCP section on Growth Containment Boundary & Section 2.3.1.1 Objectives & Policies Align growth containment boundaries with service provision. Focus development to settlement nodes within the growth containment boundary. Supports new development in growth containment boundaries consistent with service capacity and provisions</p>
	Industrial	<p>APC: Industrial uses in village should be light and demonstrate they have little or no effect on neighbouring residential uses or the natural environment.</p> <p>CVRD: There is no industrially designated land, but there is a parcel zoned I-4. It is designated Suburban Residential. It is located at 1720 Owl Road.</p>
	Goal 3 & 4	<p>APC: Like to see some form of language in the preamble to Goal 3 (Natural Environment) and Goal 4 (Water Quality) that identifies, because of the critical importance of preserving these goals, that policies established to meet goal objectives in other designations will not supersede the policies established to preserve and enhance our natural environment and water quality.</p> <p>CVRD: This will be integrated into modernization (i.e., watershed planning lens).</p>
	Goal 6	<p>APC: Policies in Freshwater should keep aquaculture out of Shawnigan Lake.</p> <p>CVRD: Aquaculture is currently in the area B zoning bylaw. Table for review in modernized zoning bylaw.</p>
	Section 4.8 Marine and Freshwater Designation	<p>APC: There should be a Freshwater objective 4.8.1 to prevent and eradicate any invasive species. This could be lumped in with noxious weeds.</p> <p>CVRD: See Goal 3, which provides objectives for invasive species.</p> <p>APC: Under policy 4.8.2 should have a reference to “not supporting or permitting development or site alteration on a wetland or riparian areas, unless approved by the Regional District. This would help in clarifying CVRDs role in developments on ALC land etc.</p> <p>CVRD: This is the provided by the riparian development permit area.</p>

		<p>APC: Still with 4.8.2 should have a statement to the effect that the Regional District “discourages boat activity that negatively impacts lake foreshore or enhances invasive species growth”.</p> <p>CVRD: There is overarching policy to protect the environment (from any activity boat activity that harms the lake foreshore).</p>
	Schedule J Sand and Gravel Map	<p>APC: Map should be updated.</p> <p>CVRD: Requested from GIS</p>
	Local Area Plan	
	Sec 1.4 Shawnigan Lake Past and Present	<p>APC: should reflect the actual character of the lake. Challenges to the lake include maintaining water quantity and quality and protecting ecosystems at a time of increasing population, increased water traffic, increase in invasive species and increase in commercial development.</p> <p>CVRD: OCP objectives and polies cover this. The content of OCP applies to LAPs. See water quality and quantity protection - Goal 4.</p> <p>APC: Shawnigan Beach Hotel and Old Shawnigan Lake Community Hall do not exist.</p> <p>CVRD: Removed.</p>
	2.7.1 Freshwater Objectives	<p>APC: There should be a line identifying the need to reduce and eradicate invasive species growth in the lake. As well, under the same 2.7.1 Freshwater objectives the Regional District should “discourage” any activity that results in having a negative effect on maintaining and improving a healthy foreshore.</p> <p>Under 2.7.1 there should be a line identifying that the Regional District supports water quality, biodiversity, watershed and riparian zone protection.</p> <p>CVRD: See above.</p>
	Appendix I Harmonized Population Projections	<p>APC: Reference to Shawnigan Station should be updated (should be patio home development at the south end of Shawnigan Lake).</p> <p>CVRD: We agree with this request, but don’t have a suitable name to replace it with. Will update in the future.</p>
	Update School Name	<p>APC: Brooks Shawnigan Lake is now St. John’s Academy Shawnigan Lake.</p> <p>CVRD: Corrected in section 2.12.1.</p>
	Existing OCP Policy 3.4	<p>APC: Amenity policy 3.4 is not in OCP.</p> <p>CVRD: A new amenity policy has been drafted and will be in a forthcoming staff report to EASC.</p>
	Existing OCP Policy 3.6	<p>APC: Development Approval Information policy 3.6 is not in OCP.</p> <p>CVRD: See section 4.16 in OCP.</p>
	Existing OCP Policy 15.2.5	<p>APC: Highway Commercial policy discouraging highway sprawl, uncontrolled commercial development, and impact on rural landscape and major net works roads. Policy states: “The</p>

		<p>plan does not support additional Highway Commercial lands along the TCH or major network roads.</p> <p>CVRD: See Commercial objectives in OCP section 4.9.</p>
Electoral Area C	HOCP Objective/Policy #	HOCP Objective & Policy/Comments
	HOCP General	<p>APC: The Harmonized OCP is an excellent document that will be a blueprint for developing the Modernized OCP. The amount of work that went into creating it in such a tight timeframe is phenomenal.</p>
	LAP General	<p>APC: The Area C Local Plan draft is also well done. Content provided for changes affecting 1.6 South Cowichan and Cobble Hill, Past and Present</p> <p>CVRD: incorporated</p>
	Parks	<p>APC: Add full list of parks</p> <p>CVRD: done</p>
	Modernization	<p>2.8 Tourist Commercial</p> <p>A designation between Bed and Breakfast and larger facilities for tourists is needed. There are applications where outbuildings with facilities could be utilized as tourist accommodation, but this would need to be carefully crafted to limit the number of accommodations.</p>
	Modernization	<p>2.9 Residential</p> <p>Seniors' housing should be in an area that is well serviced, meaning that transportation (bus), health support (medical, dental, physiotherapy, etc.), pharmacy, grocery, and other services are within walking distance for accessibility.</p>
Electoral Area D	HOCP Objective/Policy #	HOCP Objective & Policy/Comments
	Submission on Sustainability	See Section 1.2 Sustainability and Resilience: Ensuring a Relevant OCP Focus
		<p>APC: The submission provided recommendations on where the OCP should go from a sustainability perspective.</p> <p>CVRD: The HOCP language was reviewed and amended with consideration of this submission (available upon request).</p> <p>CVRD will region-wide Community Satisfaction Survey happening in late September, which will randomly poll 600 residents by phone to give us statistically valid results. It will also include an open-link online survey that can be completed by any resident who wishes to provide input.</p>

		It will be identical in many ways to the one we conducted in 2016 so that we can use those results as a baseline for comparison to 2019 and measure changes in satisfaction.
	2.3.1.1.5	<p>Objective & Policy: Encourage high-quality development that enhances and benefits the community as a whole.</p> <p>APC: Definition: 'high-quality development'.</p> <p>CVRD: Good comment. Provides flexibility but should be revisited in the modernization.</p>
	2.3.1.1.6	<p>Objective & Policy: Direct new development away from hazard areas, including floodplains and steep slopes.</p> <p>APC: Definition: 'hazard areas' – more than seismic?</p> <p>CVRD: Hazard areas are defined in DPs and subject to the <i>Local Government Act</i> requirements including technical reports.</p>
	2.3.2.1.7 3.31, 3.3b, 3.3g & DPA/s	<p>Objective & Policy: Develop strategies to support denser housing developments that meet housing affordability targets.</p> <p>APC: Assume growth containment boundaries prevail.</p> <p>APC: As a policy setting body, it seems to me that the regional board should also set policies to support VCBs, ensure appropriate services, establish development permit areas (very important) and protect agriculture lands.</p> <p>CVRD: Growth containment boundaries, DPs and agriculture policies will be reviewed and refined in the modernization.</p>
	2.4.1	<p>Objective & Policy: Natural Environment</p> <p>APC: No stated policy on air quality.</p> <p>CVRD: Air quality is federal.</p> <p>Objective in Main OCP:</p> <p>1. Protect the quality of air, land and water and encourage stewardship.</p> <p>Area D OCP – Section 5.5 has several policies on air, noise and light pollution.</p>
	2.7.1.2.4	<p>Objective & Policy: Supports sustainable land development with economic development initiatives.</p> <p>APC: Definition: Comprehensive Recreational</p> <p>CVRD: Comprehensive Recreational not found in the HOCP.</p>
	2.7.1.2.16 1.	Objective & Policy: Expects heavy and resource-based industries to minimize impacts on surrounding land use, while ensuring and contributing to the quality of life and residents and the natural environment.

		<p>APC: Definition: ‘heavy industry?’</p> <p>CVRD: Each zoning bylaw will identify heavy industry uses.</p>
	2.8.1.1.10.vi	<p>Objective & Policy: Encouraging the elimination of pollution resulting from commercial shipping anchorages in Cowichan Bay.</p> <p>APC: Is pollution from commercial shipping in Cowichan Bay documented? Agree it should be investigated as a potential contributor to the Valley’s often poor air shed quality.</p> <p>CVRD: Encourage – can be education.</p> <p>Current area D OCP (pg. 86)</p> <p>(a) The CVRD will collaborate with Transport Canada and the BC Chamber of Shipping to eliminate pollution resulting from commercial shipping anchorages in Cowichan Bay.</p> <p>This is out of jurisdiction as a policy so reworded and moved to an objective—the OCP policy language is broad in this instance for flexibility.</p>
	General	<p>APC: To what degree should policies align with and reinforce objectives?</p> <p>CVRD: They don’t. Objectives specifically can address matters of concern outside of jurisdiction.</p>
	Industrial 3.1.3.2.1	<p>Objective & Policy: Wishes to ensure that light industrial uses are located where there are minimal negative impacts of increased noise, traffic or servicing costs or loss of environmental quality to the surrounding neighbourhood or the municipality.</p> <p>APC: To what degree should policies align with and reinforce objectives? Is “minimum” the intent? “Minimal” could be too limiting.</p> <p>CVRD: See noise bylaw.</p>
	3.1.11.1 Future Growth Areas	<p>Objective & Policy: Supports development in the expansion areas only with an approved growth boundary expansion and as part of a comprehensive development.</p> <p>APC: What are “expansion areas”? Curious why a new term “expansion areas” is needed in addition to “growth areas”. Aren’t they the same thing at the end of the day?</p> <p>CVRD: OCPs are required to identify future growth areas but expansion areas may or may not be synonymous with growth areas.</p>

	3.1.11.1.2	Objective & Policy: Does not envision significant change to existing land use or further subdivision that increases density, impact or intensity of use of land until sufficient comprehensive planning has been approved, except in those areas where public infrastructure is required to address environmental issues.
		<p>APC: “Does not envision...” sounds wooly</p> <p>CVRD: This is from current Area D OCP – it is basically stating the vision is for development to occur in serviced areas.</p>
	3.1.6.2.5 Parks	Objective & Policy: Supports considering accommodating horse-friendly parks and trails and facilities in close proximity to parks, schools and other community destinations
		<p>APC: Interested in rationale for horse-friendly trails.</p> <p>CVRD: Considerations to accommodate where appropriate.</p>
	General	APC: There is also an Institutional designation. Should be Recreational?
		CVRD: Not clear?
	Residential 3.1.9.2.1	Objective & Policy: 1. Encourages innovative housing and subdivision designs such as detached clustered residential developments, particularly for sloped upland areas; the regional district will provide flexibility in regulatory bylaws.
		<p>APC: Feels like too many policies and specifics rolled into one policy. Why “particularly for sloped upland areas” for detached clustered residential developments?</p> <p>CVRD: What was the intent of the bylaw?</p> <p>Wording can be amended.</p>
	Settlement Nodes 3.1.10	<p>APC: Feels underdeveloped Does special needs housing fit here?</p> <p>CVRD: To implement the master plan or growth strategy, the four settlement nodes will direct growth at different growth rates and are intended to mix density ranges, transportation, commercial and industrial use relative to population and employment projections and watershed capacity with a low to medium threshold risk. Table 3-1 Targets to be developed in the modernization.</p>

Local Plan	1.1	<p>Vision <i>The Cowichan Valley in 2050 enjoys a vibrant, diverse and sustainable economy, natural environment and society in a resilient community that has adapted effectively to climatic, technological and other change.</i></p> <p>Cittaslow Vision <i>The Cittaslow Cowichan Bay is an enhanced rural residential community where residents wish to retain the rural character, protect the wild space, ground water and agriculture community and keep the estuary healthy and flourishing.</i></p> <p><i>Cowichan Bay will be the best place to enjoy local food, wine, art and recreation within a maritime experience, as we celebrate and steward our natural and cultural environment in a friendly slow-paced community.</i></p> <p><i>– Cowichan Bay Improvement Association Vision</i></p>
		<p>APC: would prefer to add “inclusive community, respectful of First Nations”</p> <p>CVRD: Not clear which vision statement this is referring to? Visions will be reviewed in the modernization.</p>
	1.4	<p>Objective & Policy: The plan area is bound on the south by electoral area D (Cowichan Bay), on the east by the Satellite Channel and Sansum Narrows, on the north by the Municipality of North Cowichan and Cowichan Tribes, and on the west by the City of Duncan and electoral area E (Koksilah Business Park/Cowichan Station). First Nations reserves are outside the jurisdiction of the official community plan.</p> <p>APC: Incorrect names for adjoining area(s) C and E?</p> <p>CVRD: Corrected.</p>
	1.5	<p>Objective & Policy: The plan area is bound on the south by electoral area C (Cowichan Bay), on the east by the Satellite Channel and Sansum Narrows, on the north by the Municipality of North Cowichan and Cowichan Tribes, and on the west by the City of Duncan and electoral area E (Koksilah Business Park/Cowichan Station). First Nations reserves are outside the jurisdiction of the official community plan.</p>

		<p>APC: Is 'Cowichan- Koksilah's plan area? Is the potential restarting of the ENR a factor to consider?</p> <p>CVRD: Changed to Cowichan plan area.</p> <p>Yes, consider in the modernization appropriate content.</p>
	1.6.1 Plan Area Objectives	<p>Objectives: Recognize and preserve electoral area D Cowichan Bay as a "dark skies" community, by preventing illumination of the night sky and light trespass. Avoid illumination of the night sky by:</p> <ul style="list-style-type: none"> fully shielding light fixtures in order to direct light downward and avoid light trespass onto neighbouring properties; not permitting flashing lights, neon lights and signs that may pose a public nuisance, safety hazard or other negative impact; specifying in the subdivision servicing bylaw for the plan area, excluding the Koksilah village area where street lighting has been identified as a critical safety need, that any future subdivision only include street lighting as needed for public safety such as at major road intersections; and including in development permit area guidelines and implementing bylaws concerning signage provisions respecting the prevention of excessive illumination, light trespass and safety and public nuisance issues related to lighting. <p>Remove inappropriate lighting associated with local government operations and encourage other government facilities or private development (i.e., street lighting at Wilmot and Pritchard; Lambourn water treatment plant) to remove or upgrade its lighting; if required for public safety, lighting should be retrofitted to prevent excessive illumination and glare.</p> <p>APC: 3, 14 and 19 are referring to the same topic.</p> <p>CVRD: Amended</p>
	1.6.2 Plan Area Policies	<p>#4 Discourages applications to rezone commercial or industrial land to residential uses.</p>
		<p>APC: Do we really want 1.6.2.4 if we need affordable housing? If we want to enhance housing options, I think that limiting cluster housing to one storey (or 1.5 storeys) is impractical and too restrictive. Many communities have cluster housing with attractive two-storey dwellings.</p>

		<p>I have not commented on the specific zoning categories since this should be the responsibility of the harmonization committee. I support that coordination across the regional districts wherever possible and practical. Congrats on the work to date.</p> <p>CVRD: Not clear this is the policy referenced? Attainable Housing Cowichan working on a regional plan; regional OCP address need for regional affordable housing strategy consistent with the new affordable housing initiative supported by the CVRD. Will be reviewing all zoning regulations in the modernization.</p>
	Future Development Designation	<p>Objective & Policy: The Future Development designation is intended for the growth containment boundary, which includes the commercial nodes and the residential settlement areas in general proximity to them. If not already designated land, these lands will be identified in the modernization.</p> <p>APC: Not clear how this relates to the GCB.</p> <p>CVRD: Future development is often, but not always, directed to the GCB.</p>
	Settlement Nodes	<p>APC: Seems unfinished.</p> <p>CVRD: Work for the modernization. Targets to be developed in the modernization.</p>
	Heritage page 16	<p>APC: Paragraphs 2, 3 and 4 belong at the front of the plan.</p> <p>CVRD: Part of this content can be moved to the front of the plan.</p>
	1.2 Goals Local Plan	<p>The nine goals of the regional OCP are: etc. Goal 8. Mitigate and adapt to climate change. Goal 9. Strengthen relationships with First Nations communities.</p>
		<p>APC: In more detail, these goals include the following concepts: Prefer objectives. Goals 8 – climate change deserves more than one sentence joined with commitment to First Nations. Need specific reference to GHGe as in the current OCP. Also, under commitments I would like to see a commitment to see a specific objective to “working collaboratively with First Nations to develop economic initiatives.” Would prefer that enhancing rural community character from the current OCP remain as a goal.</p> <p>CVRD: Each policy section includes objectives and policies in these areas. Goals 8 and 9 are the overarching goals under Our Commitments – each of these goals have sections in the regional OCP – in the local plan the high-level, overarching goals are repeated.</p>

		<p>The regional OCP has statements on GHGe and are legal requirements. Regional OCP content – rural character see Section 3.3.11. Development in these areas should generally maintain the rural character in rural settlement nodes and be consistent with the Liquid Waste Management Plan. Added enhance rural community character to 1.6.1 Plan Area objectives.</p>
	2.2.1.1 Agriculture Objectives Local Plan Area D	<p>Objective & Policy: 1. Mitigate the negative environmental impacts of farming.</p> <p>APC: Must be more than one objective...?</p> <p>CVRD: Many of the area D objectives and policies were offside the <i>ALR Act</i> – this is what is currently remaining in the area D plan.</p> <p>Area D For ALR land, processing and storage are designated as farm uses in s. 11 of the ALR Use Regulation and require no ALC approval. The criteria referring to servicing and highway access should be removed for ALR land and for ALR land the only criterion should be that the use is permitted by the <i>ALC Act</i> and ALR Use Regulation. <u>Policies which consider rezoning</u> for non-farm uses such as affordable housing, tourism and recreational uses of ALR land are offside of 2.46 of the ALCA and removed. The ALC would have to approve any leasehold subdivisions and would have to approve any covenant granted over ALR land and unlikely to approve H on referral. The ALR Use Regulation allows the Regional District to permit education and research uses subject to a limit on structures to 100 square metres per parcel (s. 27 of the Regulation). No ALC approval is necessary. Conditions: A zoning bylaw can not lawfully stipulate that a property is wholly owned by a government agency or registered non-profit organization or is a partnership of both. 2.2.1.1 - Agriculture objectives - Wouldn't these also included promoting and facilitating agriculture as a career, agriculture-related tourism and so on?</p> <p>Suggest new objectives be considered for the modernization.</p>
	2.2.2.4 Agriculture	<p>Objective & Policy: 1. Notwithstanding policy 1 above, may support an application for an OCP amendment, rezoning, subdivision or ALR exclusion for Lots 9-17, section 8, range 1, Cowichan District, subject to the following conditions:</p>

	Policy Local Plan Area D	<p>APC: To what parcel does this refer?</p> <p>CVRD: Lots northwest of the Peninsula Coop gas station at Bench Road and the TCH, which includes Blacky's Auto Wrecking.</p> <p>They are designated Agricultural and zoned A-7.</p>
	2.2.2.4-10	<p>APC: Is all this detail required? Seems out of scale with rest of document.</p> <p>CVRD: Agriculture is a large part of area D – this will be reviewed – see comment just under 2.2.2.</p>
	2.3: Industrial	<p>Objective & Policy: The Industrial designation supports secondary forestry manufacturing, value-added agriculture and high-tech industries that have the capability of providing a high standard of employment.</p> <p>APC: List at end of first paragraph seems limiting. What's the source? Why this list?</p> <p>CVRD: The source is the area D OCP.</p> <p>The zoning bylaw should do the work.</p>
	2.3.2.5	<p>Objective & Policy: Does not support the designation of new lands or establishment of new zones for the purpose of accommodating heavy industrial uses.</p> <p>APC: What are heavy industries?</p> <p>CVRD: Not defined in area D OCP. The zoning bylaw should identify the uses.</p>
	2.3.2.6	<p>Objective & Policy: Supports and encourages the development of light industrial activities within the Industrial designation, including value-added wood products, manufacturing, food processing and cold (food) storage, through zoning and, where systems are in place, the provision of community water and sewer services to parcels where such activities take place.</p> <p>APC: Same as 2.3. Why limited to this list?</p> <p>CVRD: See above.</p>
	2.4	<p>APC: Maritime Centre not included in the above paragraph.</p>

		CVRD: Added.
	2.5.1	<p>Objective & Policy: Ensure a strategic and planned approach to the acquisition and maintenance of parks and trails.</p> <p>APC: Suggest item 7 should be first on the list.</p> <p>CVRD: Moved.</p>
	2.6	<p>APC: No mention of current marine industrial. Working harbour and Local character likely to be contentious issues.</p> <p>CVRD: 2.6 - Seems that the concept of a Working harbour is up in the air right now on account of the Terminal application.</p>
	Page 27 Marine Village Designation	<p>Objective & Policy: Cherry Point Marina is a long-standing marina use southeast of Cowichan Bay, which also falls within the Marine Village designation. While the Cherry Point Marina has had less of a public focus in the past, there is an opportunity through redevelopment to diversify the mixture of uses on the site and to enhance public access to the waterfront.</p> <p>Sensitive development within Cowichan Bay Village and at Cherry Point, along with their associated marinas, is needed to avoid negative impacts on parking, pedestrian and vehicular safety, aesthetic values and the environment. Furthermore, specific attention is needed to address parking, transit infrastructure and pedestrian amenities such as pathways and sheltered viewing and seating areas in order to enhance the overall experience of being in Cowichan Bay Village.</p> <p>APC: Marine Village, paragraphs 3 and 4. Approach road to Cherry Point Marina is over private land which has stymied redevelopment.</p> <p>CVRD: Not clear what is being suggested—please be specific.</p> <p>2.6.8.1 - The opportunity for revitalizing the Cherry Point Marina is moot without resolution of the road access issue.</p> <p>For modernization.</p>
	2.6.8.1	Objective & Policy: Supports the revitalization and enhancement of Cowichan Bay Village, Cherry Point Marina and Wilcuma Lodge as commercial nodes.

		<p>APC: Ditto.</p> <p>CVRD: Not clear what the suggestion/comment is.</p>
	2.8.2 – Cluster Residential	<p>APC: Criteria for where located in terms of land configuration and lower density properties, transportation, proximity to services, etc. Post-OCP implementation document submitted to Coralie.</p> <p>CVRD: Received and reviewed.</p> <p>Scenarios based on existing zoning provided to the APC Chair.</p> <p>Changes would require zoning bylaw amendments and potentially OCP amendment for the designation.</p>
	– 2.12	<p>Objective & Policy: There is currently one heritage designation in area D: the Cowichan Bay Lawn Tennis Club. There is one heritage site on the heritage register (Old Koksilah School) and several sites identified for possible inclusion in the heritage register.</p> <p>Household and lifestyle needs vary widely in the plan area. The community growth framework is intended to accommodate the diverse needs of all residents by providing a range of lifestyle opportunities with corresponding land uses, residential densities and community services and facilities across the physical landscape.</p> <p>Rural areas are capable of agricultural and natural resource productivity and have high scenic and environmental values. They provide habitat and support biodiversity and environmental processes, particularly in undeveloped areas. Rural areas encompass all lands within the Agricultural Land Reserve and other lands which support agricultural, industrial and resource-based activities. Rural areas also include low-density, rural residential areas including the Kingscote Road and Bartlett Road neighbourhoods and the rural residential area along Cowichan Bay Road between Hillbank and Bench Roads. Rural areas may also accommodate a limited amount of cluster residential development, particularly where significant natural areas and features are preserved and protected as a result.</p> <p>The local plan also includes significant marine and natural areas, which include areas with intact native vegetation, environmentally sensitive areas and watercourses. These areas support terrestrial, aquatic and avian species and perform critical ecological services such as rainwater filtration and erosion control. They also provide an aesthetic function in maintaining</p>

		<p>the appearance of the rural and seaside landscapes by buffering and separating land uses to lessen the potential for land use conflicts. These areas are least suitable for human habitation.</p>
		<p>APC: Repeats Heritage, page 16.</p> <p>CVRD: They are different page 16 and 2.12</p> <p>There are no objectives or policies on page 16.</p>
	2.4.1	<p>Objective & Policy: No stated policy on air quality.</p>
		<p>APC: Policy on air quality.</p> <p>CVRD: See comment above.</p>
	2.4.1.2.17	<p>APC: Monitoring after land clearing in terms of invasive species, tree cutting, etc.</p> <p>CVRD: Not clear?</p>
	2.4.1.3.6	<p>Objective & Policy: What does 'quality control' mean in the context of rainwater?</p>

		CVRD: Should be addressed in the DPs, which also require a review and update.
	2.4.1.3.10	<p>APC: Non-forestry trees a key element of rural-urban character and valued natural environment, but:</p> <ul style="list-style-type: none"> • Mature trees can be a public safety issue (fire and falling) • Frequently cause damage to infrastructure • Some are dying due to extreme weather • Some stands are becoming geriatric <p>Suggest a tree management plan is needed.</p> <p>CVRD: Can be considered in the modernization.</p>
	Commercial 3.1.8.2	<p>Objective & Policy: Provide a range of commercial uses, including retail, tourist, commercial and highway commercial.</p> <p>APC: What is highway commercial? How does it dovetail with recent preliminary review of development along the TCH?</p> <p>CVRD: Designations as stated are from the existing area D OCP and will be reviewed in the modernization.</p>
	Marine 3.1.7.4	<p>Objective & Policy: Recognizes the international importance of the Saanich Inlet and Satellite Channel for fisheries, food security, tourism and marine wildlife</p> <p>APC: Does not reference appropriate industry and employment.</p> <p>CVRD: There is a section on employment policy in the Main OCP.</p>
	Marine 3.1.7.4	<p>Objective & Policy: Generally does not support expansion of marina facilities in order to preserve both the environmental and the scenic qualities of sheltered areas.</p> <p>APC: There is a section on employment policy in the Main OCP Sounds wooly.</p> <p>CVRD: Marine 3.1.7.4 - The phrase “Generally does not” in reference to support of the expansion of marina facilities sounds wooly. Suggest there would be situations where there would be support. If so, what would the criteria be?</p>
	General for designation (M)	<p>APC: No reference to pollution of any kind.</p> <p>CVRD: Note the following policies:</p>

		Supports appropriate non-toxic and green materials in construction and operation in the marine and marine foreshore.	
	Industrial 3.1.3.2.1	Objective & Policy: Wishes to ensure that light industrial uses are located where there are minimal negative impacts of increased noise, traffic or servicing costs or loss of environmental quality to the surrounding neighbourhood or the municipality.	
		APC: Is “minimum” the intent? “Minimal” could be too limiting.	
		CVRD: See CVRD Noise Bylaw.	
Electoral Area E	HOCP Objective/Policy #	Objective & Policy/Comments	
	Our Communities Rural Settlement	APC: Rural settlement – difference from rural centre/neighbourhood, no? Is it more reflective of Cow Stn and/or Glenora?	
		CVRD: Currently Rural Centre and Neighbourhood Nodes combined in the typology.	
	Regional OCP Goals	Our Communities	Goal 1. Manage growth holistically.
		Our Natural Environment	Goal 2. Improve and expand the range of housing.
		Our Services and Infrastructure	Goal 3. Protect and enhance natural areas.
		Our Well-being	Goal 4. Manage infrastructure sustainably.
			Goal 5. Strengthen food and agricultural systems for food security.
			Goal 6. Preserve heritage and strengthen arts and culture.
		Our Livelihoods	Goal 7. Realize the region’s economic potential.
		Our Commitments	Goal 8. Mitigate and adapt to climate change.
			Goal 9. Strengthen relationships with First Nations communities.
		APC: <i>Goal suggestions</i> <i>Effectively manage growth within a holistic framework</i> <i>Protect and enhance the natural environment</i> <i>Develop infrastructure sustainability plan</i> <i>Develop food security infrastructure and support a strong regenerative agricultural sector</i> <i>Support arts and culture and strengthen heritage and history</i> <i>Realise the regions circular economic potential</i> <i>Develop water quality and quantity plan</i>	

		<p><i>Make sure all regional challenges are reflected in the regional goals, add water, transportation. Make sure all goals are reflected in regional challenges.</i></p> <p>CVRD: Goals to be reviewed in the modernization. Revised regional challenges section.</p>
	2.2 Land Use Policy Areas	Director: climate change – what about other hazard lands?
	<p>2.3.2 Goal 2. Improve and Expand the Range of Housing</p> <p>2.3.2.1 Objective #8</p>	<p>Director: 8 and under policies for range of housing section - Add a reference to small/tiny homes – tiny homes on wheels are popping up everywhere but are not legal as they do not meet code. We need to be encouraging small footprint eco-friendly homes as a housing option and advocating for policy that works for this type of approach. If this is not possible in the overarching harmonized doc then we should specifically add it to the Cowichan/Koksilah LAP. See Squamish and Grand Forks for background on issue and potential approaches.</p> <p>CVRD: Add and support eco-friendly homes.</p>
	2.3.1.1 Policy #6	<p>Objective & Policy: Encourages appropriately located commercial, institutional and light and heavy industrial development.</p> <p>APC: Area E doesn't want heavy and doesn't specify adding new commercial or institutional.</p> <p>CVRD: HOCP states "appropriately located". Area E can specify.</p>
	Policy #4	<p>Objective & Policy: Discourages rezoning of rural lands to smaller parcels for residential use.</p> <p>APC: Area E would support this, but the reference given (page 42 of Area E OCP) doesn't seem relevant.</p> <p>CVRD: Please specify reference – page #s keep changing.</p>
	Objective 5	<p>Objective & Policy: Encourage high quality development that enhances and benefits the community.</p> <p>APC: Definition? Development that enhances and benefits community.</p> <p>CVRD: Defined through DPs, energy step code.</p>
	2.3.2.2 #4	<p>Objective & Policy: Encourages buffering of commercial and industrial uses from adjacent rural and residential uses and the preservation of access and views from adjacent rural and residential uses.</p>

		<p>APC: “Buffering” is not limited to physical barriers.</p> <p>CVRD: Correct, can be broadly interpreted.</p>
	2.4 Policy Area: Our Natural Environment	<p>Director: Delete riparian last sentence first paragraph – (its broader than riparian health).</p> <p>CVRD: With a changing climate and population growth, water conservation and consumption are creating conflicts between user groups (e.g., residents, industry) and threatening environmental flows that are critical to riparian ecosystem health <u>in particular</u>.</p>
	2.4.1.2 Objectives #9	<p>Director: Should clarify what is meant by ecosystem inventory – ie. to what scale – should probably reference rare and endangered ecosystems, too.</p> <p>CVRD: <u>Develop and maintain a list</u> of ecosystems and wildlife corridors, older second-growth forest and seasonally flooded agricultural fields. Changed wording – task for the modernization.</p>
	2.4.1 #17	<p>Objective & Policy: Reduce and eradicate the introduction of invasive species, pests and diseases that affect native ecosystems.</p> <p>APC: “Reduce info” of native spp.</p> <p>CVRD: Please clarify “reduce info”?</p>
	2.4.1	<p>APC: Add language “one of the premier estuaries on the west coast of North America as well as significant marine birdlife, rare ecosystems, dry rock outcrops. There is an increasing awareness of the need, etc.</p> <p>CVRD: Will review content in the modernization.</p>
	2.4.1.2 #4 #6 #8 #12	<p>Objective & Policy:</p> <p>#4 Encourages rainwater management techniques in the design and construction of new development to control quantity and quality of rainwater runoff.</p> <p>#6 Encourages the rehabilitation of damaged natural aquatic spawning and rearing areas in consultation with the local and senior levels of government, community groups and property owners.</p> <p>#7 Discourages development immediately adjacent to a mudflat, marsh or delta area.</p> <p>#11 Supports reduction of illumination of the night sky in residential areas.</p>
		<p>Director: 4 is good but need something specific about CVRD maintaining an inventory of park ecosystems and condition and their specific contribution to protection of the natural environment and provision of ecosystem services because we have lots of leverage and opportunity.</p>

		<p>#6. Why just marine? – fish use streams so should read “freshwater and marine environments”. #8 not sure why specifically or just reference to “mudflat, marsh or delta area” should it no be immediately adjacent to any riparian type of ecosystem? #12 remove “in residential areas”.</p> <p>CVRD</p> <ol style="list-style-type: none"> 1. See 3.3.6 #9. 2. See 3.3.7 Marine and Freshwater. 3. (covered in riparian DP). 4. (Safety issues, did not remove).
	2.4.1 Goal 3. Protect and Enhance Natural Areas	<p>Director: Change coordinate to support – I expect this came from the watershed service function, but the reality is we can only do this by supporting and participating with all the other partners/players.</p> <p>CVRD: Objective #24 <u>Coordinates</u> development that is consistent with the protection of watercourses, wetlands, riparian areas, aquifers and sensitive ecosystems. Changed to “Coordinates” and moved to objective.</p>
	2.5 Policy Area: Our Services and Infrastructure	<p>General comments</p>
		<p>Director: Our services and infrastructure – no discussion of stormwater management and need in some areas for storm water management service – e.g., Eagle Heights/Koksilah neighbourhood – it is covered in the LAP but should be identified as an issue in this section if it is not elsewhere? Also, shouldn't here be specific reference to recs in INNOVA report?</p> <p>CVRD: DP guidelines will refer to stormwater management; also see:</p> <p>2.5.1.1 Objectives #14 Review storm water management and other nonpoint sources of pollution with all new development applications.</p> <p>3.3.15 Development Approval Information</p> <p>3.2 General Development Policies</p> <p>HOCP Page 22</p>

		The CVRD Water and Wastewater Utilities Review and Assessment for the Cowichan Valley Regional District (Innova Strategy Group, 2017) recommends that official community plans include policy that links growth, operational efficiency and financial sustainability for the services that support projected growth through each OCP to limit fragmented growth. This strategic integration will lead to significant cost savings to the utility users within the CVRD.
2.6.1.2 Policy #4		<p>Objective & Policy: Supports a viable and diverse agricultural industry including new food processing, value-added and agri-tech initiatives.</p> <p>APC: Cannabis related businesses.</p> <p>CVRD: Regional electoral area policy and zoning bylaw amendments forthcoming.</p>
2.6.1 Goal 5. Strengthen Food and Agricultural Systems for Food Security		<p>1. Policy: Supports the Cowichan Watershed Board, in the promotion and uptake of efficient agricultural water use techniques, such as drip irrigation instead of spray irrigation.</p>
		<p>Director: Policies #1. Add Min Agric and Environmental plan program to agencies supporting; add policy about supporting residents to grow food – e.g. backyard chickens, establishment of community gardens etc.</p> <p>CVRD: Supports the Cowichan Watershed Board <u>and the Province</u> in the promotion and uptake of efficient agricultural water use techniques, such as drip irrigation instead of spray irrigation.</p>
2.6.2 Goal 6. Preserve Heritage and Strengthen Arts and Culture		<p>Objective #3 Identify cultural heritage landscapes that contain heritage buildings, structures, <u>vegetation</u> and <u>open space</u> of architectural or <u>historic significance</u> and the arrangement of which represents distinctive cultural processes in the historical use of the land.</p>
		<p>Director: Goal 6. – should be some reference to outdoor heritage spaces – e.g., a tree can be considered an important heritage feature and we should acknowledge that here and address in modernization.</p> <p>CVRD: Addressed objective #3, will add to list in the modernization.</p>
2.7.6		Objective & Policy: Attract emerging industries to the Cowichan region.

		<p>APC: Attract emerging industries.</p> <p>CVRD: Review in the modernization.</p>
	#11	<p>Objective & Policy: Support home-based businesses in residential areas that contribute to the local economy, lessen auto dependency, respect the natural environment and water resources, and enhance neighbourhood character.</p> <p>APC: Home-based businesses.</p> <p>CVRD: Zoning bylaw regulations.</p>
	2.8.1 Goal 8 Mitigate and Adapt to Climate Change	<p>Objective & Policy: Climate models project an increase in annual average temperature of almost 3°C in our region by the 2050s. There will be a doubling in the number of summer days above 35°C from an average of 16 days/year to 39 days/year. This will impact future water and cooling demands, which in turn impacts our ecosystems, watersheds and communities. <u>Overall precipitation amounts are expected to decline</u> (see Section 1.2.4), with more precipitation expected to fall during extreme storm events. While these increases alone are not a dramatic departure from the past, <u>the increase in precipitation is expected to be distributed unevenly</u> over the seasons and among extreme events. Most rain in our region falls over the winter months, and this is projected to continue in the future. Other projected climate changes will also impact our region. Decrease in snowpack, frost days and summer precipitation, combined with increasing temperatures, may cause tree growth to decline and mortality rates in vulnerable species to rise. Increased risk of extreme rain events in winter, with their increased erosion potential, can be expected to challenge harvest opening sizes, cut-block orientation, road-building and de-activation practices, slope-stability practices, blow-down prevention, rotation lengths and commercial viability. Certain tree species in our region's mountains may migrate to different elevations in search of suitable temperature and precipitation conditions. Water shortages during the dry spells and associated increases in water cost may have a significant impact on the viability of forestry in our region over the long term.</p>
		<p>Director: First paragraph – contradictory? “Overall precipitation amounts are expected to decline... the increase in precipitation is expected...” Also, should reference the likely negative impact to aquifer recharge (the result of the more intense rain events running of).</p> <p>CVRD: amended to state “the increases in precipitation during extreme storms”.</p>
	2.8.1.1 #10	<p>Objective & Policy: Encourage and participate in the development of an airshed protection plan that will include measures to reduce air pollution by:</p>

		<p>APC: Reduce high polluting wood burning fireplace.</p> <p>CVRD: In areas F and I this is a core need.</p> <p>Add “where appropriate”.</p> <p>1. Encourage and participate in the development of an airshed protection plan that will include measures to reduce air pollution by: reducing the number of high-polluting wood burning fireplaces and encouraging low-polluting heating sources <u>where appropriate</u>;</p>
	2.8.1.2 Goal 8. Mitigate and Adapt to Climate Change Policies	<p>Objective & Policy:</p> <ol style="list-style-type: none"> 1. Encourages the integration of climate adaptation in all new development. 2. Encourages new developments to be energy efficient. 3. Encourages citizens and stakeholders to foster climate excellence in communities. 4. Encourages energy efficiency and the use of renewable, clean energy to reduce reliance on fossil fuels in all decision-making.
		<p>Director: Policies – really need to replace “encourages” with “requires”; also need to reference watershed management/growth management from the adaptation and GHG perspective.</p> <p>CVRD: Addressed in DPs (energy efficiency). 2.5.1.2 Policy #2 Supports the development of a regional watershed management plan that considers growth consistent with capacities and limitations of each watershed and an approach for low-risk development.</p>
	2.8.2 Goal 9 Strengthen Relationships with First Nations Communities	<p>Objective & Policy: Cowichan Watershed Board</p>
		<p>Director: should add reference to Cowichan Watershed Board and governance document as an important initiative and instructive collaboration. Add Policy to – continue to support the Cowichan Watershed Board</p> <p>CVRD:</p>

		<p>See 2.6.1.2 <u>Supports the Cowichan Watershed Board</u> and the Province in the promotion and uptake of efficient agricultural water use techniques, such as drip irrigation instead of spray irrigation.</p> <p><i>Watershed Management</i> Regional watersheds are facing increasing pressure from development, contamination, depletion, population growth and climate change. The good news is that many Cowichan communities are aware of these issues and already working collaboratively to address them, including leading-edge collaborative efforts such as the work being coordinated by the <u>Cowichan Watershed Board</u>. Other opportunities remain for developing coordinated watershed management plans for regional watersheds currently lacking plans (e.g., Shawnigan Lake watershed) and to enhance work with First Nations and other management partners on the development and implementation of existing and new watershed management plans.</p>
	3.3.1 Growth Containment Boundary	<p>Objective & Policy: Growth containment boundaries are one of the most important planning tools to contain growth and protect the natural environment and rural areas. The overall objective is to accommodate <u>90% of growth within the GCB</u> (the long-term stable footprint for urban development). In most electoral areas it is policy that the growth containment boundary, where identified, will accommodate all or most growth projected. In the modernization phase of this plan, the growth containment boundaries will be reviewed in conjunction with servicing capacity and build-out of existing land. The plan must identify residential needs for at least five years and may be measured every five years to determine the effectiveness of policies to contain growth within the boundary.</p>
		<p>Director: Managing growth policies direct that the rural settlement areas are to grow at a rate of no more than 10% of any new residential development in the regional district over the next 50 years. What does that look like?</p> <p>CVRD: See rennie population, housing and employment scenarios to be reviewed in the modernization along with buildouts.</p>
	General Development	<p>Objective & Policy: Add recharge areas.</p>
		CVRD: Added to #1 Main OCP.
	3.1.5	<p>Objective & Policy: Add community gathering spaces, emergency centres.</p>
		CVRD: Added emergency. Social already exists.

	3.1.6 Parks	Objective & Policy: Add habitat for fish... other important ecosystem goods and services. Protection and restoration.
		CVRD: Habitat for fish in paragraph 1 exists. Protection of ecosystems in Part 2.
	3.1.6.1.8	APC: Add “and support”. CVRD: Added and support.
	3.1.7	Objective & Policy: Marine
		APC: Add “For example, seawalls and other shore hardening, etc.” CVRD: Sometimes, not always. Depends on individual particulars.
	3.2 General Development	
		Director: Development should be consistent with the retention of the visual landscape of natural areas, especially on or near the waterfront, hilltops and ridges, and main transportation corridors. CVRD: 3.2.3 Policy Development should be consistent with the retention of the visual landscape of natural areas, especially on or near the waterfront, hilltops and ridges <u>and main transportation corridors.</u> <u>Added</u>
	3.1.7.2 Policies	APC: Add Supports enforcement of the Province riparian regulations. CVRD: Redundant.
	3.3.2 Agriculture Designation	Director: Protecting ag land must include considering sustaining water availability for ag. CVRD: See Objective 3.3.2.1.5 Encourage environmentally friendly agricultural practices, including improved water management, conservation and protection practices for agriculture.

	3.3.2 Agriculture Designation	<p>Director: Does not support any requests for subdivision of ALR land unless the new parcel is 0.8 ha (2 ac.) or less in size and is sited on soils having an agricultural capability rating of class 4 or higher as noted in the Land Capability Classification.</p> <p>CVRD: ??</p>
	3.3.3 Forestry Designation	<p>Objective & Policy: Until recently, the local forest resource was linked to local manufacturing facilities and mills, providing employment and representing the most influential sector of the local economy. Today, many of the economic ties no longer exist between the forest resource and the local community. <u>Meanwhile, the economy is diversifying, and the relative importance of the service and tourism sectors is growing and is dependent on scenic and recreational values of forestry.</u> Forestry will remain an important natural resource industry but will likely continue to decrease in absolute and relative terms, at least over the short and medium term, due to harvest declines and the closure of local sawmills, etc.</p> <p>Director: Forestry – paragraph starting “until” need to rework to include idea that economic shift to tourism and other sectors dependent on scenic and recreational values of forestry and with climate change – the ecological services provided by intact tracts of forest.</p> <p>CVRD: <u>underlined words added.</u></p>
	3.3.5 Institutional Designation	<p>Objective & Policy: Private schools, such as Shawnigan Lake School and Brookes Shawnigan Lake in Shawnigan Lake and Brentwood College in Mill Bay, have experienced steadily growing enrolment for several years and are vital parts of those communities and are big economic drivers in the region.</p> <p>Director: Institutional – private schools are a big economic driver in the region. Not just Brentwood and Shawnigan Lake – Evergreen, Sunrise, Queen Margret’s, Montessori.</p> <p>CVRD: no changes – “such as” examples only.</p>
	3.3.6 Parks Designation	<p>Director: Parks – this write up and the policies are weighted to recreation. Need to strengthen benefits of parks re: ecological services especially in light of climate change stress as well as the social (both use and non-use values) and economic benefits.</p> <p>CVRD: Objective #5</p>

		<p>Establish and maintain parks, trails and outdoor recreational uses throughout the plan area to provide healthy social, cultural, recreational and environmental education opportunities that support <u>the local economy</u>, support natural features and processes and <u>reduce greenhouse gas emissions</u>.</p> <p>Objective #9</p> <p>1. Protect the ecological values and strengthen greenspaces.</p> <p>Will review in the modernization.</p>
	3.3.7.1 Freshwater Designation Objectives	<p>Director: Add prevent noxious weeds.</p> <p>CVRD: 3.3.7.1 Objective #6 Prevent noxious weeds.</p>
	3.3.8 Commercial Designation	<p>Director: Further commercial development along highway not supported – focus on moving vehicles through.</p> <p>CVRD: This is a broader discussion involving all electoral areas. Current OCP Traditional commercial development of retail, business and personal services plays a role in the settlement nodes in the regional district land use pattern. It is anticipated that increased demand for various types of commercial uses will develop, particularly for:</p> <ul style="list-style-type: none"> highway-oriented commercial uses adjacent to the Trans-Canada, particularly at major intersections
	3.3.13 TUP	<p>Objective & Policy: 3.3.13.1 Would consider holding a public meeting prior to deciding to issue a temporary use permit.</p> <p>Director: TUPs would hold (not consider) public meeting.</p> <p>CVRD: The requirement for public notice does not equate to a requirement for a public hearing. The public notice requirement can as easily be interpreted as a requirement for transparency, as a requirement for a public opportunity to make representations. Thus, considers is appropriate.</p>
	Goal 1.2 Local Plan	<p>Our Well-being Goal 5. Strengthen food and agricultural systems for food security.</p>

		<p>APC: .2 Goals <i>"Preserve and protect Agricultural Land Reserve (ALR) lands and support initiatives of the Agricultural Land Commission to assist farming to be economically viable. "</i> As with 2.2 on p.19, the plan should encourage/support farming on non-ALR land, especially in Sahtlam where we have little ALR land. All the wording on this that we had in there has been removed...</p> <p>CVRD: Regional OCP Policy Area: Our Well-being Goal 5 Strengthen Food & Agricultural Systems for Food Security The goals from the Main OCP are repeated in the local plan without the objectives and policies repeated from the Main OCP.</p>
	1.6.2 Local Plan	<p>Sahtlam residents take pride in their homes and their community and manage their properties to maintain a balance of wilderness and cultivation, as well as privacy from the road and from the neighbours. Given the risk of wildfire, an open space is maintained around the homes and other structures on the property. Often fire-resistant building materials are used, such as metal roofs. Other less obvious ways in which Sahtlam residents are resilient and independent include maintenance of their wells and septic systems, rainwater collection strategies for summer irrigation of gardens, and stocking and drying of wood for winter burning. There is a strong environmental conservation ethic within Sahtlam, respecting the heritage of the natural landscape.</p>
		<p>APC: This was written by a former planner as the Vision, and it doesn't exactly jive with current practices. Many residents do not take pride in their properties – there are junk yards all over the place. Many of the houses are in poor condition and are fire hazards, not many pay attention to wildfire issues and there aren't many metal roofs or rainwater collection systems.</p> <p>CVRD: Moved to the Sahtlam Vision Statement and Goals.</p>
	Local Plan 2.2.1.3	CVRD: Planner changes: "lessors" should be "lessees" or "tenants"? The lessor is the landowner.
		<p>Objective & Policy: Objective that mentions zoning for community gardens.</p> <p>CVRD: Deleted.</p>
		<p>Objective & Policy: Doubt that ALC will accept the exception to the policy on ALR exclusion etc. for neighbourhood plan processes. This policy encourages land speculation.</p> <p>CVRD: Deleted.</p>
		<p>Objective & Policy: ALC may also be concerned about the policy supporting the use of ALR land for "therapeutic purposes," even in association with farm use.</p> <p>CVRD: Deleted.</p>
	Sahtlam	Objective & Policy: Preserve and celebrate Sahtlam's unique character, heritage and identity.

	Objective 1.6.2.3.1	<p>APC: Preserve the heritage, history and rural landscape character.</p> <p>CVRD: Should jointly agree with area F as area F plan will also need to change. HOLD on these comments for the version submitted after the HOCP referral with agreement from area F.</p>
	Sahtlam Objective 1.6.2.3.8	<p>Objective & Policy: Preserve the peace and quiet of the Sahtlam area.</p> <p>APC: Add “in village centre”.</p> <p>CVRD: See Main OCP Settlement Node Typology.</p>
	Sahtlam Policies	<p>APC: Add “new policies – minimizes the footprint and limits development outside of home plate”.</p> <p>CVRD: Not sure what footprint and home plate mean?</p>
	Glenora Objectives	<p>Objective & Policy: New content added.</p> <p>APC: Change to:</p> <ol style="list-style-type: none"> 1. Preserve the heritage, rural landscape character of Glenora. 2. Protect the community heart of Glenora. 3. Improve opportunities for active transportation throughout the Glenora neighbourhood. 4. Maintain productive forestry and agriculture lands. 5. Subject to the availability of a community water system, expand housing within Glenora to allow residents to age in community. <p>CVRD: Delete #1 and replaced with 1 – 3. #4 – in Forestry and Agriculture objectives and policies. #5 already exists.</p>
	Glenora Policies	<p>APC: Change to:</p> <ol style="list-style-type: none"> 1. Preserves the heritage and history of Glenora through the CVRD’s Community Heritage register. 2. Encourages road improvements for active transportation and amenities such as off-road and roadside trails. 3. Generally does not support the conversion of lands designated as forestry or agriculture for residential uses. <p>CVRD: #1 covered in Heritage section 2.13 and Main OCP Section 2.6.2 Goal 6 Heritage. Main OCP Transportation for active transportation. 3.1.6 Parks for parks and trails.</p>

		<p>For off-road and roadside trails. See 3.1.3 Forestry for protection of Forestry lands. See 3.1.2 Agriculture for protection of agriculture lands.</p> <p>Avoiding repeating objectives and policies from the Main OCP.</p>
	Cowichan Station Objectives	<p>APC: Change to: 1. Preserve the heritage, history and rural landscape character of Cowichan Station 2. Protect the community heart of Cowichan Station 3. Improve opportunities for active transportation throughout the Cowichan Station neighbourhood 4. Maintain productive forestry and agriculture lands. 5. Subject to the availability of community water system, expand services and housing within Cowichan Station village area to allow it to become a more complete community. 6. Develop a Cowichan Station village plan.</p> <p>CVRD: #1, 2, 3 added. #4 – Main OCP. #5 – Under review in the modernization. #6 – Added.</p>
	Cowichan Station Policies	<p>APC: Change to: 1. Preserves the heritage and history of Cowichan Station through the CVRD's Community Heritage register. 2. Encourages road improvements for active transportation and amenities such as off-road and roadside trails. 3. Generally does not support the conversion of lands designated as forestry or agriculture for residential uses.</p> <p>CVRD: #1 – Is an objective and addressed in the Heritage section to review and Main OCP. #2 – Main OCP policies and Section 2.6.2 Preserve Heritage and Strengthen Arts & Culture. #3 – Fetter board decision-making; each application considered on its own merits but generally. agriculture lands not considered for rezoning for residential.</p>
	Eagle Heights Objectives	<p>APC: Add: 3. Provides safe active transportation routes through the Eagle Heights neighbourhood and to the Koksilah Business Park and Duncan.</p> <p>CVRD: In Main OCP General Development and Roads and Servicing.</p>
	Koksilah Business Park Objectives and Policies	<p>APC: Suggest they move from 2.4 to 1.6 as it is essentially a mixed-use area that constitutes a neighbourhood.</p> <p>CVRD: Please clarify by providing specific objective/policy.</p>

Residential Land Use Designations Multi-family housing	<p>APC: RR/FC remove; not clear why CD is required. Not clear if RC can/should be dealt with as hazard lands.</p> <p>CVRD: Rural Residential/Forestry Conservation (RR/FC) Can not remove a designation – can redesignate – this is a modernization task.</p> <p>River Corridor (RC) – currently designated land.</p>
Agriculture Policies	<p>APC: Need a definition of commercial/industrial scale agriculture versus small lot agriculture non/industrial style farming – need to differentiate so where A2 it is only small-scale environmentally and neighbourly benign.</p> <p>APC: Where are the stats on farm status and agriculture land not in the ALR?</p> <p>CVRD: Designations and zones density will be reviewed for consistency in the harmonized/modernized. See Map 7 series for maps of agriculture and ALR land and performance measures. Several Ag objectives and policies were removed because they were <i>ultra vires</i>.</p> <p>See Main OCP Policy Area: Our Well Being Agriculture & ALR regulations and BCAA zoning regulates the uses.</p>
	<p>APC: Plan should state encourage/support farming on non-ALR land, especially in Sahtlam where we have little ALR land.</p> <p>CVRD: See Main OPC 2.6.1 and 2.7.1 The local plan includes Agriculture and ALR lands (see map 7 series).</p>
Forestry Objectives	<p>APC: Change 2. Increase forest cover to provide more carbon sequestration, temperature amelioration and watershed protection.</p> <p>CVRD: Main OCP 2. Protect and assess the carbon sequestration and ecosystem values of natural systems, including forested lands, agricultural lands and wetlands.</p>
Parks Policies	<p>APC: Need to add that the priority, where appropriate as per the Community Parks and trails master plan, is the dedication of land to provide roadside pathways and this actually applies in the Koksilah Business Park and agricultural areas.</p> <p>CVRD: Main OCP General Development, Roads and Servicing and Parks.</p>

	Commercial Policies	APC: Add iii. clear evidence that there is a local demand and need for RV and car lots.
	Rural Residential Objectives	APC: Add to 2 and the total developed footprint to be limited to protect watershed functioning. CVRD: In Main OCP – protect watersheds.
	RR Policies	APC: 2. Change to: Encourages rainwater harvesting and other green building approaches to minimize and conserve water use. CVRD: Covered by DPs.
	Manufactured Home Park Objectives	APC: Add 1. Maintain MP stock and encourage additional MH parks in serviced areas; MPs will provide community gathering and garden facilities. CVRD: #1 – See procedures bylaw amendments. #2 – Add to zoning.
	Comprehensive Development Residential	Objective & Policy: 1. Protect wildlife habitat in the context of housing development, through land dedication.
		APC: As noted above not sure that we need this – and objective 1 should be in Rural Residential. CVRD: Comprehensive Development Residential Designation. Is an existing designation – can be reviewed in the modernization.
		Objective & Policy: 1. Provide a variety of housing choices including single-family and multi-family units.
	Integrated community	APC: Objective 4 add “including affordable”.
	Development Comprehensive	CVRD: Can add.
	General	APC: Add a definition for rural landscape character – Rural landscape character is defined by its mature mixed forests interspersed with farmlands that are bordered by native species hedge rows. These pastoral scenes are enjoyed from slow country roads that lead to modest homes with traditional agricultural building and vibrant little village centres. CVRD: <u>Added general language</u> in the beginning of the LAP.
	Performance Measures	APC: Where are the student developed performance measures?

		CVRD: Staff is not aware of these. The performance measures are based on the land use designations. The MOCP will include indicators consistent to all electoral areas.
	General	APC: The Area E APC would like to acknowledge the work of the present and past members, staff and our Electoral Area Director, who have all provided valuable contributions the draft Area E OCP. The APC also acknowledges the contribution of staff and community members for the development of the draft Sahtlam Local Area Plan, and would like to thank the authors of the 1994 documents for their inspiring work. The APC would like to express that while we are endorsing the current Harmonization and Modernization projects as important steps towards streamlined and modern planning documents, we would be remiss if we did not comment on the repeated interruptions that have resulted in a regrettable delay in producing a completed OCP and Zoning Bylaw to our community.
	Tree Protection	APC: It was noted that many local communities have a Preservation or Protection of Trees Bylaw. It is recommended that such a bylaw be enacted within the CVRD. This bylaw should be applicable to all private property owners and include tree removal conditions, property development requirements and protection of trees during construction. The CVRD should be committed to the protection and enhancement of urban and rural forests. CVRD: Unlike municipalities, regional districts do not have authority to adopt tree protection bylaws, unless for mitigation of natural hazards.
	Natural Environment	APC: Policy 4.8.4 does not provide protection for the following: (1) Historical, nesting or culturally significant trees, (2) Endangered ecosystems such as the Coastal Douglas fir; (3) trees for water retention and erosion control; (4) safe and known wildlife corridors. CVRD: Unclear which policy is being referred to. Please refer to comments above regarding authority for tree protection. Also note that the CVRD is beginning to work with the Coastal Douglas-fir Conservation Partnership (CDFCP).
	Temporary Use Permits	APC: Under 4.11.1 Settlement Notes -- provide clarity on the allowance of TUPs for commercial and industrial use that does not fit with current OCP. CVRD: TUPs are addressed in HOCP sec 4.14. TUPs do not have regional application. TUPs within LAPS are based on existing/former OCP content.
	Development Permit Areas	APC: Several Development Permit Areas which need to be included: (1) TCH Corridor; (2) Highway 18 view protection and greenspace; (3) Re-evaluation of the Paldi Comprehensive Zone; (4) Home-based businesses to not include retail sales and automotive uses. CVRD: 1) TCH corridor is addressed in various ways in new DPAs 10, 11,12. 2) Can be addressed in modernization. 3 & 4) Can be accomplished through modernized zoning bylaw.

	Wetlands and Sensitive Ecosystems	<p>APC: Wetland and Sensitive Ecosystems are not listed in the objectives of the HOCP as a separate entry similar to 4.8 Marine Freshwater Designation.</p> <p>CVRD: Sensitive ecosystems are addressed in DPA2. See also HOCP sections 3.2.2; 3.2.2.1.5, 11 & 17; 3.2.2.2.4; 4.1.2.</p>
	Wake Lake	<p>APC: A complete absence of any reference to Wake Lake protection policies that are in the current Area E OCP including: 3.1, 3.1.17, 5.1.8, 5.1.12, 5.1.13, 7.5, 11.1.2, 11.1.19, 11.1.20, 11.1.22. In particular, the protection of the Wake Lake and the identification of the 1000m radius of Lake Wake as important to the habitat and migration routes of the Western Toad. This area around Wake Lake should be included as a separate Development Permit Area.</p> <p>It was also noted that the Sensitive Areas maps for Wake Lake is inaccurate and it is recommended to review all Sensitive Area maps to ensure accuracy (see example of incorrect map above).</p> <p>CVRD: A DP for Wake Lake is under development.</p> <p>All sensitive areas maps are being replaced.</p>
	Oil/Water separators	<p>APC: Ensure standard requirement for oil/water separator as part of development permit applications for commercial/light industrial (or home-based businesses such as auto repair, etc.).</p> <p>CVRD: Aquifer Protection DP addresses this.</p>
	Goal 1 Manage Growth Holistically	<p>APC: 7. Minimize air, noise AND light pollution.</p> <p>CVRD: Added in sec 3.2.6.2</p>
	Goal 2 Housing	<p>APC:</p> <ol style="list-style-type: none"> 1. Foster complete communities in all zones including Light industrial and Commercial. 8. Consider incentive-based ways to lower the cost of housing. <p>Add building efficiency and net zero development.</p> <p>CVRD:</p> <ol style="list-style-type: none"> 1. Complete communities are addressed on page 6. Complete communities mean access to services and employment (which includes light industrial and commercial). 8. See 3.2.1.3.9. <p>DP for GHG emissions reduction (DPA 13) addresses this.</p>
	Natural Environment	<p>APC: List Coastal Douglas Fir (CDF) in sensitive ecosystems throughout the document as well as older forest not just old growth.</p> <p>CVRD: See previous comments.</p>
	Goal 4 Water	<p>APC: 3. Add storage.</p> <p>CVRD: Suggest adding to sec 3.2.2.3.3.</p>

		Promote and support water conservation and storage measures with residents, business owners and industry (e.g., xeriscaping, water audits).
	Goal 5 Infrastructure	APC: 6. Develop a cooperation protocol with MOTI on infrastructure and maintenance. We desperately need to develop a protocol with MOTI on safe roadsides so add protocol to 17. add 20. To develop a plan to increase local renewable energy generation across all zones, increase region wide composting and wood chipping and locate opportunities for local circular economic development. CVRD: A protocol on infrastructure and maintenance would fall within the Engineering Services purview. DP 13 addresses energy conservation. More work on this will be forthcoming.
	Goal 6 Food & Agriculture	APC: resilient is not sufficient, regenerative should be used instead. CVRD: See sec 3.2.5.1
	Heritage	APC: Objectives 7. Heritage properties, add the word structure so that things like the railway pass over Koksilah road could be included. CVRD: See 3.2.4.3.3
	3.2.5 Regional Economic Potential	APC: Regional business parks are mentioned here. Business parks are not complete communities, so use of this term is inappropriate. We need to strengthen the linkages between light industry and commercial zones with second floor residential/affordable housing uses throughout the document. These are also places that generally have large roofscapes and excellent solar exposure there by initiating localised energy production. CVRD: This can be addressed through the modernized zoning bylaw.
	Page 19, policy 4	APC: Supports sustainable development, please supply a definition of sustainable in regard to development, building, etc. so it is clear what is required to be sustainable. CVRD: There are no definitions in the OCP as it is a policy document.
	3.2.6 Climate Change	APC: Add 14. Develop a protocol with MOTI on safe roadsides. 15. Reduce tree removal and enact a “cut a tree, plant a tree” policy. CVRD: See section 4.13 and 3.2.3.1.6. See 3.2.6.1.8.
	4.1 General Development	APC: Objectives add 5. roadside pathways. Anywhere roads are mentioned multi-use pathways should be considered. Policies 5. streams and culverts. Need to define stream as seasonal or not. Year-round streams should not be culverted in future development. Should emphasize the importance of daylighting. It is noted daylighting is not currently mentioned in the document and should be. CVRD: See comments above regarding roadside pathways.

		See 3.2.2.2.2 regarding restoration (daylighting).
	4.4.1 Forestry	APC: Objectives add 8. Protect Coastal Douglas Fir (CDF), older forest, wildlife corridors and consider increasing standard setbacks for all wetlands and watercourses. CVRD: See 3.2.2.2.2 (wildlife corridors), 4.8.4 .7 (riparian setbacks), Goal 4. See previous comments regarding CDF.
	4.5 Industrial	APC: Objectives 6. Add in text to ensure that light industrial development can and should be integrated as part of complete communities. Improve groundwater protection, dark sky, low albedo, solar rooftops and increase landscape requirements. CVRD: Complete communities imply employment lands, which include industrial. See DPA 4 (Aquifer), DPA 13 (Energy and water conservation; GHG reduction), DPA 12 (Industrial). See policy 3.2.2.8 (dark sky).
	4.7 Parks	APC: As the document says to actively encourage land acquisition, there needs to be a means to establish an acquisition fund. CVRD: See 4.7.2
	4.8 Marine and Freshwater	APC: Support increasing standard setbacks. CVRD: Marine DPs can be established. Setbacks for oceans, rivers and lakes can be set in floodplain areas based on technical reports.
	4.9 Commercial	APC: Current document supports mixed use, but it should be taken a step further and address multi-storey with residential and affordable housing on upper levels. Encourage/require local materials, energy efficiency, water conservation and solar roofs in all retrofit and new development. CVRD: Policy currently says, "Support mixed-use commercial establishments that are consistent with rural ambience of settlement nodes". More specific regulations will be in modernized zoning bylaw. See DPA 13 (energy and water conservation).
	4.10 Residential	APC: Objectives add 10. Retain all existing CDF ecosystems Policy 4. Encourages development of (remove multi-family and just keep the word) housing 5. Add Efficiency. CVRD: ultra vires. See DP 13 (energy and water conservation).
	4.11 Settlement Nodes	APC: 1. Supports water and sewer services in settlement nodes – It is the position of the Area E APC that the residents of Cowichan Station may not want our village upgraded to include these services. This should be addressed and discussed at a community meeting. CVRD: Will be considered in modernization.
	4.13 Road and Servicing	APC: We need to do more than 'encourage' roadside paths policy 3. Supports zero waste... Why is this policy only in this section? It should be throughout. CVRD: Repetition of policy is not the objective of the harmonized OCP.

	5.1 Performance Measures	APC: Performance measures chart has blanks that should be filled out. CVRD: Performance measures Table 3.1 says, “This includes known information for the electoral areas, with gaps identified for the later modernization phase of this plan”
	Area E LAP	
	1.4 Sustainability and Climate Change	APC: page 4: This is the only place where the endangered ecosystem CDF is mentioned. CDF loss is a concern throughout the whole CVRD. CVRD: See section 2.3. APC: page 5 “Land development can threaten ecosystem...” replace “can” with “does”. CVRD: Retain “can”.
		APC: page 8. “does not support further subdivision...” Will the density range projections provide this information? CVRD: Unclear which policy is referred to.
		APC: The policies and objectives for each area within E should be aligned, for example why does Glenora and Cowichan have 'protect dark skies and quiet' while Sathlam does not? The plan needs to clearly indicate a better building standard, net zero, grey water, water storage, etc. in residential. CVRD: Sahtlam needs to be consulted in modernization. Building standards are subject to the Building Bylaw.
		APC: Koksilah industrial park DPA required Koksilah watershed DPA required. CVRD: Will be reviewed in modernization. Currently covered in DPA 4 (aquifer) and DPA 12 (industrial).
	2.3 Forestry	APC: 2. Maintain forest cover at current levels to ensure healthy ecological function probably isn't sufficient. Need to work to expand forest coverage. 3. Maintain Douglas Fir forest recommend changing maintain to preserve/enhance add 5. To recognize traditional, spiritual and cultural use of forest lands. CVRD: See previous comments.
	2.4 Industrial	APC: Integrate the complete community concept into Light Industrial. CVRD: See comments above.
	Industrial Sec 2.4.1	APC: 2.'Protect environment in industrial land development and operations. – How will this be accomplished? CVRD: Through application of DP guidelines.
		APC: Fish-bearing water course map but there are no policy objectives to go with it. CVRD: See HOCP 4.1.2, Goal 3 & policies in 4.8.4.

	Parks Objectives	APC: 3. c 'living with Roosevelt Elk....' Elk habitat exists throughout the plan area and so this objective should be included in F, A, RR, etc. CVRD: See Development Approval Information section 4.16.
	Commercial policies	APC: See comments above. CVRD: see comments above.
Electoral Area F	HOCP Objective/Policy #	HOCP Objective & Policy / Comments
	2.3.2.2	Objective & Policy: <u>Generally</u> , does not support subdivision within rural areas. CVRD: Added the underlined word.
	3.1.7.4 6	Objective & Policy: <u>Should</u> be no harmful alteration of land/water in development. CVRD: Added the underlined word.
	2.5.1.1 15	Objective & Policy: <u>In</u> the Cowichan River. CVRD: Replace “on” with “in”.
	2.5.1.2 3	Objective & Policy: <u>Generally</u> , does not support expansion of municipal services. CVRD: Added the underlined word.
	3.1.2.2 5	Objective & Policy: <u>Encourage</u> the preservation and protection of agriculture lands. CVRD: Replace “support” with “encourage”.
	2.8.1.1.10 (i)	Objective & Policy: Where appropriate. CVRD: Added underlined words. Concerns that area F is heavily reliant on wood stove burning.
	2.4.1.3 Policies – delete #12	Objective & Policy: Supports reduction of illumination of the night sky in residential areas. CVRD: Retain only in area D local plan.
	2.9.9 River Corridor (RC) Designation Objectives	Objective & Policy: 1. Supports subdivision with expansion of the waterfront parkway. CVRD: Local plan designation objective added.
		Objective & Policy: <u>Generally</u> , does not support rezoning.

	2.9.10 River Corridor Policies	
		CVRD: Added Generally (policy) local plan change made.
	2.3.2 Forestry Policies	Objective & Policy: <u>Generally</u> , does not support servicing outside of the growth containment boundary in the rest of the plan area's Renewable Resource lands.
		CVRD: Added the underlined word.
	2.8.1.1	Objective & Policy: – Coastal Flooding Bylaw
		CVRD: To be considered as part of the Marine Plan in the modernization.
	Relationships to Other Jurisdictions	Objective & Policy: May change if local plan boundary changes.
	Settlement Nodes	Objective & Policy: Add the following neighbourhoods to the local plan and to the settlement nodes table in the HOCP.
		APC: Added Greendale, Skultz Falls, West Sahtlam.
		CVRD: Local plan change.
	Heritage	Objective & Policy: Paldi Sikh Temple and Cemetery are identified as possible sites for a heritage registry statement of significance or designations.
		APC: Added.
		CVRD: Local plan.
	3.2 HOCP	APC: “the four municipalities in the regional district are outside the scope of this plan” Does the CVRD expect to hook up to the services supplied by the Regional Centres? CVRD: Engineering Services scope.
	4.10 HOCP	APC: In the rural areas, outside-----support large lot sizes and-----Does that mean support for 2 ha lots? CVRD: To be defined in the modernization after the calculations are complete.
	4.10.2.4 HOCP	APC: “...and is not disruptive to the environment and existing adjacent human made structures”. What does that mean? CVRD: Not disruptive to other housing or commercial and or industrial development.

	4.11 HOCP	APC: 3rd line: They include Regional Centers (outside the scope of this plan). What are the Regional Centers outside this plan, municipalities? CVRD: Yes, see settlement nodes 4.11.
	4.11.1.1 HOCP	APC: This whole sentence makes no sense to me. Does it mean they will take over private systems? 4.11.1 (1) Supports the provision of water and sewer services that will meet the needs of existing residents within settlement nodes and protect public health and the natural environment in situations where onsite and privately-owned systems are deemed to be insufficient. CVRD: Does not mean they will take over private systems – it does mean the board will consider supporting water and sewer in situations where private systems are insufficient.
	4.11.1.4 HOCP	APC: Why would one not have to involve the local community prior to considering a TUP? Ought to be re-written. CVRD: The requirement for public notice does not equate to a requirement for a public hearing. The public notice requirement can as easily be interpreted as a requirement for transparency, as a requirement for a public opportunity to make representations. Thus, the policy is not redundant.
	4.12.1.3 HOCP	APC: Supports future development adjacent to existing communities” Is this not sprawl? CVRD: Where appropriate only.
	4.13.1 HOCP	APC: “no new roads” New Roads are in the Area F LAP. CVRD: Currently no new major roads with the exception of those shown in Map 5.
	4.16.1.1 HOCP	APC: 1st line, should it not say --" incurs all costs associated"? CVRD: All replaces any.
	LAP 1.1,1.2, 1.3 Vision, Local Area Plan and Relationship to other Jurisdictions	APC: Already for the most part are covered in the HOCP. Why repeat? These will be removed in the modernization. CVRD: For many new readers the duplication is helpful.
	1.4 LAP Past Present and Future	APC: Refers to imperial measurement. CVRD: Corrected.

	1.6 Housing	APC: Not convinced that the sections about Sahtlam and Paldi need to be in this document. CVRD: The Area F and E folks need to agree on content changes.
	1.9 Local Planning Process	APC: Why is this in the document? CVRD: It is standard practice to advise of the planning process in development of OCPs.
	Part 2 Freshwater	APC: Designation “only protects water supplies” why not lakes and streams as well? CVRD: See Land Use Designations – Map Colour for Freshwater.
	River Corridor Designation	APC: This language very much sounds to me that the plan is friendly towards allowing acreage subdivisions along the river. It was my impression that we do not encourage human settlement along the river. Perhaps a clarification of this sentence is warranted. CVRD: Deleting 2.9.1.4(2) River Corridor Objective “Supports subdivision with expansion of the waterfront parkway.”
	Part 2 Settlement Nodes	APC: A note to indicate where one can find referenced 2.1.1 & 2.1.2 will be helpful. The same comment goes for directions to other references noted in this document. CVRD: See concordance table.
	Settlement nodes	APC: Compare with F Local Policy 5.1.7 and F Local 2.1. “Areas not shown as either existing service areas or potential expansion areas... will not be connected”. We do not know where the possible nodes will be at this time. CVRD: Correct though the LAP states: There are three neighbourhood nodes: Caycuse, Honeymoon Bay and Mesachie Lake and one rural centre: Paldi. APC: “The preference for compact communities is an alternative to rural or urban sprawl.... uncontrolled spread of residential growth” This statement always seems to me to contradict HOCP 4.12.1 Policy 3 “Supports future development adjacent to existing communities”. CVRD: Consistent depending on location.
	Part 2 Heritage	APC: Inconsistencies in heritage sections 2.13 and 1.6 CVRD: Corrected.
	Part 2	APC: Pages 11-14 lists the Land Use Planning Designations with a brief definition. Pages 23-27 repeats this list with no criteria. I assume the criteria will be added during modernization. Yes, I advise eliminating the page 11-14 list. CVRD: Retaining until the modernization then deleting.
		APC: F APC referencing the above list of Residential Designations and also the Commercial and Industrial Designations. The current F Local says the criteria for all land use designations will be modernized. According to Alison’s presentation, some of this information will be in the

		Land Use Bylaws. I hope that you will use the Section 5: VCB and Land Use Designations information in out Area F OCP draft. CVRD: Agreed.
	2.1.2.1 Growth Containment	APC: ...two possible development nodes west of Gordon Bay. Should add “one of which is Caycuse.” CVRD: Added.
	2.1.2.2.c Growth Containment	APC: What if the land is not waterfront? CVRD: Policy says, “among the board’s considerations”.
	2.3.1.5 Rustic Campgrounds	APC: See FAPC draft 4.9.1 and Definition page 7 It is important that area have a definition and rules regarding rustic campgrounds. CVRD: Added 4.9.1 as objectives though redundant with development information approval in the HOCP.
	2.3.2.2 Renewable Resource	APC: “Does not support servicing outside the growth containment boundary”. This may contradict our “node” policy. To determine those areas where urban services, particularly future community water and community sewer services, will be available for development, whether within existing development areas or in new nodes. CVRD: Please clarify.
	2.4 Industrial	APC: The Area F draft OCP has criteria for these designations. Pages 32 Area policy 5.7. 3 Area F draft OCP 5.7 states: Policy 5.7.2: The Industrial Designation is intended to accommodate a wide range of industrial uses and the implementing zoning bylaw may have a variety of zones as a consequence of this. CVRD: Carried over to the LAP. APC: Policy 5.7.3: Permitted density for lands within the Industrial designation (I) will vary depending upon the level of service available to the parcel. CVRD: Range will be specified in the modernization – not necessary to state as it would be determined by application. APC: Policy 5.7.4: The Board may consider redesignating additional lands to the Industrial category, through an application for amendment to this Plan and a zoning amendment application. In considering such an application, careful consideration will be given to the community benefit that would result if the application is approved. Careful mitigation of any negative community and environmental impacts will also be required if an application is to proceed.

		CVRD: The board may redesignate any lands – the remaining policy is redundant with the general policies and Development approval information in the HOCP.
	2.6 Park policies	APC: Why are parks policies pared down? CVRD: Park and Institutional policies are separated in HOCP. APC: Pacific Rim National Park Reserve is listed as a park in Area F. If this is so it should be referenced in the Marine section HOCP 4.8 Marine Designations. CVRD: Agreed.
	2.8.8 Tourist Commercial	APC: Where are subsections e and f from policy 5.1.8 in OCP Bylaw 4210? CVRD: Relocated to DAI section of HOCP and deleted because Board does not have to be told what it may consider.
	2.9.6(c) Comprehensive Lakefront	APC: Where does 13% originate from? CVRD: Current draft Area F OCP. Board directed staff to use draft OCP version 8.2 for harmonization.
	2.9.8.1 Country Residential	APC: Where does the number 0.4 ha come from? CVRD: Current draft area F OCP.
	2.9.13 River Corridor	APC: “Supports subdivision with expansion of the waterfront parkway.” See F APC 5.4.1 -5.4.5 No mention of future subdivision. CVRD: Mapping indicates that four parcels in RC designation are theoretically capable of subdivision.
	2.9.14.1 River Corridor	APC: Where does the number 20 ha come from? CVRD: See zoning tracker.
	2.9.14 River Corridor	APC: How many parcels in River Corridor designation are subdividable? CVRD: Mapping indicates that four parcels in RC designation are theoretically capable of subdivision.
	2.10 Settlement Nodes	APC: It should be stated here that in the future two nodes west of Honeymoon Bay are possible. Is this incorrect? CVRD: There are three neighbourhood nodes: Caycuse, Honeymoon Bay and Mesachie Lake and one rural centre: Paldi.
	2.12 Temporary Use Permits	APC: “All of area E and part of F (within the area F plan) are designated for special events”. We decided when writing our draft not to include any land designated as Temporary Use. CVRD: This is currently designated and can be removed in the modernization. Part of area F is in the Area E OCP and this will impact the Area E OCP.

	2.13 Heritage	<p>APC: Paldi is in area F. General statement: If the above land is in area F electoral district it should be only in the area F local plan and the area F land use bylaws.</p> <p>CVRD: Paldi is within the proposed Sahtlam neighbourhood plan (see Figure 1-1 in the LAP). Area E plan has objectives (opinions) but no policies on Paldi.</p>
		<p>APC: Designations in the F OCP draft but not in the Local F APC 4.8 Outdoor Recreation Park Policy. F OCP 4.9 Rustic Campgrounds Policy. Area F needs these designations and the criteria written by the Area F APC.</p> <p>CVRD: Both are policies within Rural Resource Designation in the Area F 8.2 version (which is the version the Board directed for use). In the Area F LAP, both are objectives. The expression of these objectives could be manifested in specific zones in the modernized zoning bylaw.</p>
Electoral Area G	HOCP Objective/Policy #	HOCP Objective & Policy/Comments
Item #1 (APC minutes – but not referred to APC)	Definitions not in HOCP	Objective & Policy: Definitions are more suited to regulatory bylaws.
		CVRD: Reviewed, amended and moved to zoning bylaw – Definitions in regulatory document. APC minutes, accepted as comments, not minutes (dated March 25, 2019.)
Item #2	Trackers	Objective & Policy: Policy by policy tracker not provided – would require years of time.
		CVRD: CVRD offer to meet with area G to review OCP vs. HOCP policy by policy.
Item #3	Specific policies incorrect	CVRD: Require specific policies to respond.
Item #4	Public consultation insufficient	Objective & Policy: Board approved consultation process – APC Chair review for general harmonization. The input from citizens from past consultations is reflected in the harmonization.
		CVRD: Board approved consultation – consistent with a harmonized bylaw; not in depth.
Item #5		<p>APC: Does not agree, no significant changes in policy.</p> <p>CVRD: Offered to meet with area G reps to review specific concerns.</p>
Item #6		APC: Incorrectly identifies area G as Saltair/Gulf Islands local plan.

		CVRD: The OCP is applicable to electoral area G – Saltair Gulf Islands – Bylaw 2500 but jurisdiction is Saltair. Local plan name changed to Saltair.
Item #7	Any changes to this OCP will be subject to a thorough public review process	Objective & Policy: Desire for thorough public review process.
		CVRD: OCP cannot fetter the legislative powers of the Regional Board by imposing procedural steps for the amendment of the OCP that are additional steps required by the <i>Local Government Act</i> . The board does not have the authority to include a requirement for “thorough public review” in the OCP.
Submission	Main OCP 2.3.1.1 Objectives	Objective & Policy: Main OCP Protect the rural character of rural lands and rural settlement areas.
		<p>APC: Saltair OCP To preserve the rural character of Saltair by placing clear limits on urban development.</p> <p>The proposed regional OCP and our OCP do not say the same thing. The proposal would protect the rural character of rural lands and rural settlement areas. Our OCP is about protecting the rural character of an entire community. Also, our OCP goes further by stating the rural character of Saltair will be protected by placing clear limits on urban development (S.2, P.4).</p> <p>Neither the proposal nor our OCP expressly define the term "rural character". In fact, there is no definition of "rural community", "rural landscape", "rural ambience", "rural nature", "rural setting", or "rural residential" in either OCP or in the zoning bylaw. However, although our OCP employs a number of different terms to describe "rural character", it also provides a lot of context, which indirectly defines the term "rural character". For example, our OCP implies or states single-family dwellings (S.2.1, P.4), a treed setting (S.2.3, P.6), agriculture (S.5, P.13), forest lands (S.6, P. 15), suburban residential lots and semi-rural suburban areas (S.7, P.17), home-based businesses (S.8, P.19), in-fill projects within existing residential areas (S.8.10, P.20), prohibiting new manufactured home parks (S.9, P.21), permitting small-scale commercial activity in a central commercial node (S.10, P.22), ensuring new Tourist Commercial developments are attractive, accessible and safe (S.12, P.24), ensuring future development in the Neighbourhood Pub Commercial Designation is attractive (S.13, P.26), pedestrian crossways along Chemainus Road and narrow country roads (S.19, P.41), aesthetically pleasing buildings (s.20.5.4, P.64), and earth-tone colours, etc. (S.20.5.4.1, P.64) will preserve Saltair's rural character.</p> <p>CVRD: Several objectives to protect rural character or rural lands and rural settlement areas. Settlement typology provides criteria for rural.</p>

		<p>Rural settlement areas identified in settlement typology.</p> <p>Rural is mentioned 88 times in the HOCP – identifies need to identify rural protection boundaries in the modernization.</p> <p>Setting clear limits can be achieved in the land use designations. The current land use designations in Saltair OCP.</p> <p>The Saltair OCP does not currently identify density ranges for residential designations. The modernization will identify a density spectrum range for all densifications, which will place “limits” to growth.</p>
	2.3.1.1.2	<p>Objective & Policy: Align growth containment boundaries with service provision.</p> <p>APC: Except with respect to local commercial designation (S. 10, P.22), our OCP does not describe a growth containment boundary. It also does not align growth with service provision. With respect to water, our OCP acknowledges growth will be limited by supply (S.2, P.4, and S.17, P.36). However, with respect to sewer, our OCP expressly states future growth in Saltair is guided by community planning rather than by servicing initiatives (S. 19, P.38).</p> <p>CVRD: Align growth containment boundaries with service provision where appropriate.</p> <p>See Main OCP Section 2.5 Goal 4 Manage Infrastructure Sustainably</p> <p>2.5.1.1.1</p> <p>1. Identify the appropriate level of services to meet the community’s current and future projected needs.</p>
	2.3.1.1.3	<p>Objective & Policy: Focus development to settlement nodes within the growth containment boundary.</p> <p>APC: Our OCP does not currently contain a settlement node. S. 22.2 says we will consider identifying a village containment area, "In the context of reducing GHG emissions". To date, only the Saltair Market serves this purpose. We would want to retain this policy in an amended local OCP.</p> <p>CVRD: See Map Series 1 Growth Management Concept</p> <p>Ladysmith is identified as a regional settlement centre near Saltair.</p>

		As part of the modernization growth containment boundaries existing and contemplated will be reviewed.
	2.3.1.1.4	<p>Objective & Policy: Preserve rural, agricultural and environmentally significant lands.</p> <p>APC: Again, the Saltair OCP does not contain a definition of "rural land" and focuses on protecting the "rural character" of Saltair. The Saltair OCP does not contain a definition "environmentally significant land" and focuses on preserving "environmentally sensitive land." The Saltair OCP does define and focus on preserving agricultural land. The proposed regional OCP does not contain a definition of "rural land" or "environmentally significant lands."</p> <p>CVRD: Settlement Nodes Section 3.1.10 identifies typology for different rural settlements.</p>
	2.3.1.1.5	<p>Objective & Policy Encourage high-quality development that enhances and benefits the community as a whole.</p> <p>APC: What the heck is "high quality development"? Sounds like another new term without definition.</p> <p>CVRD: Development permit areas address form and character.</p>
	2.3.1.1.6	<p>Objective & Policy: Direct new development away from hazard areas including floodplains and steep slopes.</p> <p>APC: "In addition to providing policies for environmental protection, this section provides objectives and policies for hazard lands, which have physical characteristics that may cause loss of life or property. These include areas of excessive or unstable slope, organic or poorly drained soils, and food plains." (S.3, P.7).</p> <p>CVRD: Development permit areas identify hazard areas.</p>
	2.3.1.1.7	Objective & Policy: Minimize public and environmental health risks from air and noise pollution.

		<p>APC: Policies that reduce greenhouse gas (GHG) emissions are based on reduced fossil fuel consumption and efficient use of energy, land and resources." (S.22, P.79)</p> <p>"To reduce, on a regional basis, total green house gas (GHG) emissions in the plan area by 33% from current levels by 2020, and by 80% from current levels by 2050."</p> <p>"This OCP will strive to contribute to the CVRD GHG reduction targets of 33% by 2020, and 80% by 2050, by ensuring that the CVRD will consider adopting a climate change action plan, to provide a more comprehensive set of targets, indicators, policies and actions specific to this Plan area" Obj. a S. 22, P. 80</p> <p>"Uses that alter the residential appearance of the community, such as automobile servicing, repair, and painting, or uses that potentially create noise, odors, unsightliness or noxious fumes, will not be permitted." Policy 7.8, P. 18</p> <p>CVRD: GHGe targets vary by OCP; none with quantifiable measures.</p> <p>See Goal 8 Mitigate and Adapt to Climate Change.</p>
Local plan Agriculture policy		<p>Objective & Policy: Discourages subdivision for non-agricultural uses unless the use complies with zoning bylaws.</p> <p>CVRD: Deleted – staff.</p>
Electoral Area H	HOCP Objective/Policy #	HOCP Objective & Policy/Comment
	2.1.2 Heritage local plan	<p>Objective & Policy: Heritage</p> <p>APC: Add Tudor Mill and Coffin Point.</p> <p>CVRD: Added.</p>

	3.3.2 and 3.3.3 Hazard Lands local plan	<p>Objective & Policy: Through the cooperation of the senior governments, the Regional Districts shall endeavor to identify hazardous slope lands in the plan area to designate them as Development Permit Areas. The following criteria shall be established as a means of determining hazard slope lands:</p> <p>All and with gradients exceeding 25%; All ad within 30 metres of undeveloped slopes with gradients exceeding 50%; or All within 30 metres of developed slopes with gradients exceeding 25%.</p> <p>APC: Ensure Woodley Range retained as DP.</p> <p>CVRD: Technical report received, reviewing with GIS. Mapping and geotechnical review underway.</p>
	2.4.1.2.6 Main OCP	<p>Objective & Policy: Foster shared responsibility among all levels of government and the community for protecting and restoring watershed, estuary and coastline health.</p> <p>APC: Include mud flats.</p> <p>CVRD: Added.</p>
	Current OCP Policy 7.1.5 Request staff review to ensure contained in new local plan	<p>CVRD: Added: Ensure that surface disturbances associated with the exploration for petroleum or natural gas exploration and production are remediated promptly upon project completion, in accordance with all applicable provincial standards.</p> <p>See: Section 36 of the <i>Oil and Gas Activities Act</i> Environmental Management and Protection Regulation under the OGAA.</p>
	Group home in zoning bylaw	<p>CVRD: Need to understand why group home and ordinary dwellings occupied by unrelated persons distinction is required—then we can help identify criteria that would be used in bylaw definitions of these uses.</p>
	1.5 Parks local plan	<p>APC: Added new parks and objectives for consistency with current OCP.</p> <p>CVRD: New Parks added</p> <ul style="list-style-type: none"> • Raven Park • Nature preservation park on Woodley Range • Diamond Community Park <p>New objectives added for consistency with current OCP:</p>

		<ol style="list-style-type: none"> 1. Encourage the Province to facilitate community recreational trails on Woodley Range. 2. Develop a nature park within DL 51 adjacent to Bush Creek. 3. Consider a children's playground in the Diamond community park.
	HOCP General Comment	<p>APC Comment: The Area H APC recognizes the work that has gone into this HOCP and wishes to express appreciation for all the thought and effort. The comments and suggestions included in this response are not intended to be critical in any way but rather an effort to improve an already pretty impressive document. In general, some of the policies, although well meaning, sometimes appear to lack substantial enforcement, in particular when applied to environmental and aquifer issues; and on some other occasions terms are rather undefined and subjective and thus open to legal manipulation. It is hoped the MOCP will include a appendix with clear descriptions of abbreviations and a comprehensive list of definitions of terms used in the document.</p>
	HOCP Intro	<p>APC Suggestion: Item #6 - CVRD OCP Bylaw No 1497. 1993. The List of Electoral Areas are all named except area H. Please add "Area H - North Oyster/Diamond".</p> <p>CVRD: Corrected</p>
	HOCP Intro	<p>APC Suggestion: Place a title at the top of the 5th page "TABLE of CONTENTS" and Identify the location of "ABBREVIATIONS" in the Table of contents as 1.1.4 and add "DEFINITIONS" as 1.1.5</p> <p>CVRD: Table of Contents titled added. Other changes cannot be made for reasons of editorial standards.</p>
	HOCP Page 2	<p>APC Suggestion: Add LAP (Local Area Plan) to abbreviations and definitions.</p> <p>CVRD: Abbreviation added. Definition not created.</p>
	HOCP Page 2	<p>APC Suggestion: Add EA (Electoral Area) to abbreviations and definitions.</p> <p>CVRD: EA is not abbreviated in the document. The HOCP does not have a definitions section.</p>
	Vision HOCP Part 1	<p>APC Suggestion: Refrain from referring to the existing seven EA OCPs as "Local Area Plans" (LAPs). The term "Local Area Plans" is a new term and issued to describe the small addendums to the HOCP that deal with items that are unique to each EA. Using it to name or describe two completely different plans will be/is extremely confusing for readers unfamiliar with the project. There are more instances in the HOCP where this term is used without clarification that could be identified with word recognition software and corrected. (see below)</p> <p>Page 4 (3.2.1) Page 5 (3.2.1) Page 16 (3.2.4) Page 21 (3.2.6) Page 39 (4.15) (+ more in LAP)</p> <p>CVRD: Reviewed and corrected</p>
	HOCP Part 1	<p>APC Suggestion: Part 1.1 - Table 1.1 seems to be missing.</p> <p>CVRD: Corrected</p>

	1.1.3 Scope Local area plans HOCP	APC Suggestion: Part 1.1.3 - "Local area plans capture issues unique to each community....." Word "community" should be replaced with "electoral area". CVRD: Added.
	3.2 Land Use Policy Areas HOCP	APC Question: Part 3.2 - "built form" meaning? CVRD: Built form refers to the built or physical environment, most often meaning buildings and the ways that buildings relate to streets and open spaces.
	Table 3-1 Settlement Nodes Typologies HOCP	APC No objection subject to: Table 3-1: "Rural settlement" If you are going to recognize Yellow Point (two words, not one) as a "Rural Settlement" you must also recognize and list The Diamond. Our EA is named "North Oyster/Diamond" not North Oyster/Yellow Point. It is highly offensive for the residents of the Diamond area to constantly be excluded in this manner. CVRD: Added.
	Goal 3 Protect and Enhance Natural Areas HOCP	APC Approval not recommended due to: Spelling "lon-term" should be "long term". (In Mandarin Lon = Dragon) CVRD: Corrected.
	3.2.2.1.8 Protect and Enhance Natural Areas HOCP	APC Question: 3.2.2.1 bullet #8 – "Encourage environmentally sensitive lot clearing" How would this apply to logging on forest land? CVRD: The CVRD has no jurisdiction.
	3.2.3 South Cowichan Service Expansions and Constraints HOCP	APC Approval not recommended due to: Spelling "Sawnigan" should be "Shawnigan". CVRD: Corrected.
	3.2.5 Childcare in the Region HOCP	APC Comment: 3.2.5 - Child care in the Cowichan Region. Here is the problem. As Ladysmith's population has grown and housing density has increased, we have seen increasing demands on the school system. Ladysmith Primary used to have one portable in the back that was used for music class, and now there are four (perhaps even more now) brand new portables housing classes that do not fit in the school. Compounding this problem is the fact that SD68 the Nanaimo-Ladysmith School Board has closed Ecole Davis and a number of other schools in the south end, such as Woodbank (same school district but I believe is RDN). Teachers are complaining they do not have proper access to supports like Educational Assistants and their classrooms are overcrowded, parking at drop off and pick up has now become dangerous, and childcare spaces for preschool and before and after school care are full with wait lists. Recreation is also affected, as there are limited spots in sports and lessons

		<p>that get filled up the day the guide is released. So, although we can't argue with complicated statistics by mathematicians that hold degrees in predicting these sort of things, many young families are saying from personal experience that population growth does often lead to shortfalls in services. More a school board issue but the CVRD should have some input on this.</p> <p>CVRD: See objectives 3.2.5.1, policies 3.2.5.1, 3.2.5.2, objectives 4.6.1, policies 4.6.2, objectives 4.7.1.</p>
	4.4.2 Renewable Resource HOCP	<p>APC Suggestion: 4.4.2 Add 9. Discourage high elevation logging. Extremely important for summertime stream and river flow continuity.</p> <p>CVRD: This suggested policy is <i>ultra vires</i> on private land. Recommend as an issue to consider in modernization community circles.</p>
	Page 32	<p>APC Suggestion: In this instance, the term "LAPs" describes the new (HOCP) Local Area Plans</p> <p>CVRD: Please clarify. May already be corrected.</p>
	4.8.3.13 Marine Objectives	<p>APC Suggestion: 4.8.3 #13 "Recognize the Cowichan estuary as a significant... Please add "juvenile salmon rearing habitat".</p> <p>CVRD: Added</p>
	5.1 Monitoring and Review of the Plan	<p>APC No Objection subject to: 5.1 Second paragraph. "Other changes to the OCP may be proposed by staff". As it sits, without clarifications this statement will frighten some citizens thinking it may give CVRD staff a blank check to do as they please (which is exactly what an OCP is designed to prevent). We suggest the statement be modified to state, "Minor housekeeping changes to the OCP..." and perhaps augmented with a statement with assurances the public will always be given ample opportunity to review/agree/disagree with any proposed OCP amendments prior to being presented to the board for approval.</p> <p>CVRD: deleted.</p> <p>APC Suggestion: 5.1 Second paragraph, third sentence. "The OCP is intended..." For clarification, should read "This OCP is intended..." or "The HOCP is intended..."</p> <p>CVRD: Added.</p>
	5.2 Performance Measures	<p>APC Suggestion: 5.2 First sentence. "The CVRD OCP..." As previously discussed, this HOCP is not a "CVRD OCP" because it excludes the municipalities, which are part of the CVRD. Should read "This OCP" or "The CVRD OCP for EAs".</p> <p>CVRD: Changed to: The OCP for the electoral areas.</p>
	Appendix I Harmonized Population	<p>APC No objection subject to: Appendix I, page 21 & 22. The information for area H is incomplete. Charts are not populated, and future housing needs is blank.</p> <p>CVRD: This information was harmonized across the electoral areas. Information is missing because it was absent from the existing area H OCP.</p>

	Projections & GHGe Targets	
	Appendix II Corporate Strategic Plan	APC No objection subject to: Page 1 – Add New Area H Director. CVRD: The Strategic Plan has been published.
	Appendix II	APC Comment: Page 14 - "Undertake an operational review of bylaw enforcement services and Implement the Local Government Bylaw Dispute Adjudication System". We (Area H APC members) support a review of the bylaw enforcement services, which we consider severely lacking in our area. We also support an adjudication system. Bylaws exist for valid reasons, and selective or non enforcement is completely unacceptable.
	Appendix II	APC Comment: We support inter-regional transit.
	Appendix II	APC Question: "Review the Regional Parkland Acquisition Strategy" Question: could properties sitting on an aquifer be targeted potentially as an aquifer protection park? Not expropriation but obtaining certain properties as they become available for sale or a buyout as a way to relocate dangerous activities off the aquifer. CVRD: The Strategic Plan was adopted by the Board. Recommendations or questions are best addressed to Corporate Services.
	Appendix III	APC Question: Population growth projection 1000,000 by 2050: "For any growth to be denser than 1 unit/ha it must be serviced with community water and sewer systems. Some utilities are public, and some are private and CVRD wants most utilities to become publicly owned and operated" - Water and Wastewater Utilities Review and Assessment for CVRD 2017 page 22. Question: The Diamond improvement district...does this mean the CVRD's goal is to have the Diamond water improvement district dissolved? Diamond residents will protest. CVRD: Improvement Districts have been/are a useful tool to begin to provide services so that a diversity of housing and lot sizes can be offered in various areas. However, evidence suggests that they are also associated with a lot of challenges over time due to the cost of upgrades and the level of expertise and investment required to manage utilities successfully over a long period of time. The current trends appear to be the reduction in the use of improvement districts in favour of either local government owned and managed systems or for contracts with major utility companies (Corix, Epcor, etc). Both offer benefits. The public utility approach centralizes management across a region to gain efficiencies, and it makes public health (water/sanitary) publicly accountable through the government. It also links these areas into the regional planning agenda for where future growth should occur—tending to support

		<p>more compact growth around these areas as public infrastructure can be expanded. That being said, not a lot of senior government grants are available for expanding infrastructure. They are mainly to fix failing infrastructure. However, linking these systems with good land use planning will support developers in the future adding infrastructure and possibly repairing/upgrading older systems to support nearby development at no cost to the taxpayer. And the simultaneous government control of land use and infrastructure is a belt and suspenders robust approach to managing growth.</p> <p>The private utility model offers other benefits, and they are even more stringently controlled than public utilities, through the BC Utilities Commission (BCUC). They can support infrastructure installation on good financial terms through long investment timelines and provide new infrastructure at no cost to surrounding taxpayers, and the public are permitted to buy out these systems at any time in the future, in most cases. The private utilities rates are controlled through BCUC, but they can be raised significantly over time. Many regions are not in favour of the private utility model because it can undermine compact nodal and corridor growth if projects are approved outside of the patterns adopted in the regional growth plan. However, if the regional growth plan is adhered to, then these are great options for getting infrastructure/compact growth started without the taxpayer having to fund infrastructure expansion. And the public can buy-out the system in the future when municipal infrastructure or other growth connects to it. The local improvement district (LID) offers a good level of local accountability, but it misses many of the other benefits the two other models offer—and as such, the trend is away from LIDs.</p>
	Appendix III Indicators	<p>APC Suggestion: Page 25 - Heritage assets: Consider adding Diamond Hall, NOHA Hall and Diamond theater.</p> <p>CVRD: Heritage assets indicators are based on adopted heritage register. Suggest pursuing heritage registration.</p>
	1.1 Vision LAP	<p>APC Suggestion: 1.1 Confusing use of term LAP.</p> <p>CVRD: Clarified.</p>
	1.1 Vision LAP	<p>APC Suggestion: 1.1 - Not all of North Oyster/Diamond has "reliable potable water".</p> <p>CVRD: This is a vision statement, not current state.</p>
	1.2 The Plan Area LAP	<p>APC Comment: 1.2 "The plan area includes the unincorporated community of Yellow Point." Why single out Yellow Point? The plan area also includes unincorporated communities of the Diamond, South Cedar and South Cassidy.</p> <p>CVRD: Deleted sentence referred to above.</p>
	1.7 Local Planning Process LAP	<p>APC Comment: 1.7 - This has to be the most confusing statement in the entire document. The average reader will be entirely baffled by it due to the double meaning of the term LAP. Please change it.</p>

		CVRD: Replace with: The OCP for the Electoral Areas involved a harmonization of individual Official Community Plans for each of the electoral areas. This OCP includes a local area plan (LAP) per electoral area in Schedule B.
	Figure 2.1 Area H Forest Management Lands	APC No objection subject to: Figure 2-1 This is a terrible map. It excludes the entire western half of the EA, which is all forest lands. CVRD: Will attempt to update maps but cannot create new map content that does not exist in the existing OCP.
	2.4.1.12 Parks Objectives LAP	APC Comment: Page 9 - "Consider a children's playground in the Diamond community park." Agree completely!
	2.11 Heritage	APC Comment: 2.11 As in Appendix III - Recommend adding N/O Hall, Diamond Hall and Coffin Point to a register. Also consider the Diamond theater. No one seems to know anything about Tudor Mill. CVRD: Remove Tudor Mill. Add Diamond Theater.
	DPA #1	APC No Objection: Riparian area protection is included in EA H OCP in a virtually identical format as the proposed in the HOCP.
	DPA #2	APC Approval not recommended subject to: Our existing OCP has a map of "Environmentally Sensitive Areas" that partially agrees with the D3 HOCP map of SIs and it describes considerations that should be taken upon development. However, they are not designated or included in a DPA. Additionally, the map included in D3 HOCP is very different from D2 HOCP. What has changed?
	Postscript	APC No objection subject to: As a result of recent conversations, planners at the CVRD have agreed to produce a new area H map for this DPA that agrees (as closely as possible) with the current area H OCP map of Environmentally Sensitive Areas. With the exception of Woodley Range, most are creek bottoms and wetlands, which are protected by DAP #1 already, so including them in DPA # 2 does not represent a significant change to our current OCP. CVRD: Reviewed on Webex with GIS and we agreed to include it in DPA 2.
	DPA #3	APC no objection: None shown on D3 HOCP map, none in area H OCP. Candidate for MOCP.
	DPA #4	APC no objection: Three areas shown on D3 HOCP agree with EA H OCP.
	DPA #5	APC has no objection subject to: The current area H OCP does not include a wildfire hazard DPA so inclusion at this time represents a change which were not intended during the harmonization phase. If the CVRD board decides public safety trumps stated HOCP procedure this DPA will come into force in Area H upon third reading of the HOCP. Several members of the Area H APC have expressed strenuous objections, not to the DPA itself but the complete lack of due process. It is generally agreed the DPA is needed to protect life and property.

		CVRD: The CVRD is adopting new technical wildfire reports, which will be included in HOCP. Emergency Services does not support existing wildfire maps.
	DPA # 6	APC no objection: None shown on D3 HOCP map, none in EA H OCP. Candidate for MOCP if applicable.
	DPA # 7	APC no objection: Our existing OCP contains a landslide hazard area called the Woodley Range DPA. The area and properties involved on the D3 HOCP map provided appear to be in agreement.
	DPA # 8	APC no objection: None shown on D3 HOCP map, none in EA H OCP. Candidate for MOCP is applicable.
	DPA #9	APC no objection: None shown on D3 HOCP map, none in EA H OCP. Candidate for MOCP is applicable.
	DPA # 10	APC no objection: None shown on D3 HOCP map, none in EA H OCP. Candidate for MOCP is applicable.
	DPA # 11	APC no objection: The EA H OCP contains a DPA with similar intent called the Yellow Point DPA. The area and properties involved on the map provided (UDPA11.1) appear to be in agreement.
	DPA # 12	<p>APC no objection:</p> <p>The EA H OCP contains a DPA with similar intent called the Ladysmith Harbour DPA. The boundaries and properties involved on the D3 HOCP map appear to be in agreement. There is, however, an additional property shown on the D3 HOCP map in the Cedar Road junction area that has been added to the DPA without due process. The property owners are aware of the inclusion and the CVRD has been informed of our concerns about due process, so the matter is effectively closed.</p> <p>CVRD: As per discussion with Community Planning and Development Services there are no further changes.</p> <p>APC Comment: We would like to see the entire commercial/industrial area included in this DPA in the MOCP project.</p>
	DPA # 13	APC no objection: None shown on D3 HOCP map, none in EA H OCP. Candidate for MOCP is applicable.
	All DPAs	<p>APC Suggestion: At the introduction to DPAs, it may be helpful for readers unfamiliar with the project to insert a small paragraph explaining how the method of naming DPAs has changed from using the name of the area requiring a DP to naming the justification for requiring a DP. In the MOCP phase of this project, inclusion of parcels in any proposed DPA can place major financial burdens on property owners (permits, consultants, conditions etc.). For area H, implementation of new DPAs needs to be accomplished in a transparent and informative manner or a blizzard of legal challenges can and will occur (remember Woodley Range!). Maps</p>

		need to be exceedingly accurate, and colour coded to show exactly what is being protected. All affected property owners need to be informed prior to the regulations coming into force.
Electoral Area I	HOCP Objective/Policy #	HOCP Objective & Policy/Comments
	3.1.3 – Rural Resource	<p>Objective & Policy: Forestry designation</p> <p>APC: Many residents are concerned about the plans to log the slopes of Mts. Good and Holmes. We recognize the private land status but worry about slope stability, erosion, impacts on water sources, adverse effects on the wildlife and a decline in aesthetic values, thus affecting tourism.</p> <p>CVRD: Added content Section 4 Main OCP regarding April 9, 2019 staff report from engineering and Board resolution.</p>
	2.3.1	<p>Objective & Policy: Manage Growth Holistically</p> <p>APC: Rural character (& ambiance) should be clearly defined by the CVRD as the term is subjective.</p> <p>Air pollution minimization – a significant percentage of area I residents are wood burners, often out of necessity. This needs to be recognized.</p>

Table 3: Modernization Parking Lot

Electoral Area	HOCP Objectives & Policies #	HOCP Objective & Policies	APC Chair Comments
Area A Mill Bay	2.3.1.2 – 6	Direct new development away from hazard areas including flood plains, steep slopes.	Need direction on institutional and industrial.
	2.3.2.1 – 8	Increase affordable housing options by increasing the supply of secondary suites, mobile home parks/manufactured homes and increased infill development.	Subject to community water/sewers etc.
	2.3.2.1 – 10	Integrate a regional affordable housing strategy.	Need more info to comment.
	2.3.2.2 – 5	Does not support subdivision within rural areas.	Gradually reduce density from existing.
Area B Shawnigan	2.3.2.2.4.	Arial.	Could allow residential above light commercial as affordable housing.
Area C Cobble Hill			
Area D Cowichan Bay	Local Plan CR Designation & Zone		Review in the modernization. Zone mapping sent to area D director for review in the zoning modernization. OCP designation may require amendments.
	Local Plan Designations	The Industrial designation needs fully defining with examples of what is envisaged in terms of economic development so there is openness to its potential benefits.	Review in the modernization

Electoral Area	HOCP Objectives & Policies #	HOCP Objective & Policies	APC Chair Comments
Area E Koksilah	Update to the climate projections		Modernization Main OCP.
	Main OCP 2.8.1 Mitigate and adapt to climate change	The risk of wildfire and heatwaves will increase. Language from “may” to “will”.	Review. Will retain “may”.
	Request language from “encourages” to “requires”	OCPs can not require.	
	2.3.1.1 – 1	Rural character.	Will need to be defined.
	2.3.1.1. – 2	Growth containment boundaries.	Village settlements in area E (e.g.; Sahtlam).
	2.3.1.1. – 7	Air & noise pollution.	Useful noise bylaws are a must.
	2.2.6 (b) Objective 2 (page 9 of “old” OCP)	Align growth with service provision.	Growth should also be aligned with natural carrying capacity.
	Objective 5	Development that enhances and benefits community.	Concern that economics tends to outweigh other benefits and enhancements.
	2.3.2.2.4	Buffering is not limited to physical barriers.	Buffering should also include other impacts: noise, smells, traffic, lighting.
	2.4.1.17	Reduce info of native spp.	Why “reduce”? if this is about introducing then why not “prevent”?
	2.6.1.2.4	Cannabis related businesses.	This policy needs to include or specifically mention cannabis.
	2.7.6	Attract emerging industries.	Needs to be contextual – some industries are not appropriate here.
	2.7 #11	Home-based businesses.	Needs to be clearly defined.
	2.8.1.1.10	Reduce high-polluting wood burning fireplace.	A good wood burning stove is an essential secondary heat source in rural areas.
	Objective 1	Forestry designation.	Evaluate all economic uses of forestry lands—harvest is not the only option.
	Objective 11	Marine Conservation.	20 or 30 m would be better.

	Policy #4	Settlement Nodes.	TUPs are controversial.
	Policies 9 & 10	ALR designations.	Generally against any subdivision of lands in ALR.
Area F Skultz		Growth Containment Boundary.	Review and define.
		ALR & Agriculture Lands.	Review designation and policies, particularly policies on buffers.
		Water audits.	Define.
	River Corridor (RC) Designation		Review.
Area G Saltair/Gulf Islands			
Area H Current	2.12 Heritage local plan	Traditional swimming areas.	Add additional areas.
	2.10 Roads and Servicing local plan	Horseback riding trails.	Add policies to support walking and horseback riding trails to complement main OCP 3.1.6.2 Policy. Supports considering accommodating horse-friendly parks and trails and facilities in close proximity to parks, schools and other community destinations.
		Foster shared responsibility among all levels of government and the community for protecting and restoring watershed, estuary and coastline health.	Expand protection to include mud flats.
	5.13	Subject to the policies contained within this plan, agriculture pursuits shall be given priority within the Agricultural designation and the only uses permitted are	Review all objectives and policies related to soil quality and usefulness in main OCP and local plans for consistency.

		those which shall not preclude future agricultural uses.	
	5.17	Farming has priority within the Agricultural designation and as such no legitimate farming activity shall be curtailed solely due to the objections of neighbouring property owners. Such uses may be required to be curtailed or modified by the Provincial government for the purpose of environmental protection or public health.	Ensure sufficient policies regarding priority of farming and neighbour conflicts. OCP addresses but suggest discussion.
	5.10		Review size of farm stands for regional consistency policy and zoning regulations.
	5.1.15	Additional residence for farm help.	How to ensure second dwelling for farm help is bona fide?
	5.1.17	Home occupation, group home and public park uses may be permitted in any agricultural land use category; however, if the land is in the Agricultural Land Reserve, all uses must comply with the ALC.	Address definition of group home in general. Group homes not permitted in the ALC.
	11.1.3	Parkland Acquisition Strategy.	Alison to provide list of which ones acquired and which ones outstanding.
	11.1.14	Examples of public uses that the CVRD considers worthy of encouragement at disused school sites are:	Review and revise list.
	11.1.15	Regional District considers all properties and facilities that are zoned as Parks and	Review sale of Institutional land.

		Institutional in the implementing bylaw to be important for public uses, and converting these sites to an alternative land use zone that would exclude the public and close the facilities will be very strongly discouraged by the Board.	
	12.1.1	The Board encourages the MOTI to work toward the implementation of the road network plan as outlined in Figure 13.	Review with GIS (requested) and review in the modernization.
	2.1.12	The RD encourages MOTI to improve shouldering on major roadways, etc.	Review—as it relates to accommodating people moving and horses.
Area I			