

**RESPONSE SUMMARY – BYLAW NO. 4179**

☐ Interest Unaffected by Proposal

Comments: CVRD has for decades permitted agricultural  
uses in Forestry zones. Good idea! Best regards

[illegible]

Signed \_\_\_\_\_

Acting G.M. Land Use Services CURD  
Title

2017/06/21  
Date

COWICHAN VALLEY R.D.  
Agency

**Wendy Miller**

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**From:** Wilf Marquis  
**Sent:** Thursday, July 06, 2017 1:54 PM  
**To:** Wendy Miller  
**Cc:** Iain Lawrence  
**Subject:** RE: Proposed Bylaw No. 4179

Wendy, no issues with the proposed amendment to allow for Agricultural Uses.

Wilf MARQUIS  
Senior Bylaw Officer

Bylaw and Animal Care Services  
212-2780 Veterans Memorial Parkway, Victoria, BC, Canada V9B 3S6  
Ph. 250.474.3351 ext. 22 \ Fax: 250.391.9727 \ TF: 800.665.7899  
email: wmarquis@crd.bc.ca

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**Wendy Miller**

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**From:** Berube, Nikki TRAN:EX <Nikki.Berube@gov.bc.ca>  
**Sent:** Wednesday, June 28, 2017 11:28 AM  
**To:** Wendy Miller  
**Subject:** RE: Proposed Bylaw No. 4179 - CRD Referral

Hi Wendy,

Thank you for providing the additional information.

Please accept this email as official response from the Ministry of Transportation and Infrastructure. The Ministry has no objections to the proposed amendment to the Juan de Fuca Land Use Bylaw, 1992; to include agriculture and intensive agricultural uses to the Forestry (AF) zone.

As a condition, the Ministry does require that should any commercial enterprises come to be as a result of the changes, that the proper Commercial Access permits for access to Ministry owned roads and dedications be applied for as needed.

There are no other conditions for completion. Feel free to forward any associated bylaw documentation to this office at your convenience.

Have a great day,

**Nikki Bérubé**

District Development Technician  
Ministry of Transportation and Infrastructure – Vancouver Island District  
Ph: 250-952-5562 Cell: 778-679-1973  
Fx: 250-952-4508



**Proud Member of the EAF**  
*For employees, by employees*

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**Wendy Miller**

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**From:** Emily Sinclair  
**Sent:** Wednesday, August 16, 2017 3:59 PM  
**To:** Iain Lawrence  
**Cc:** Signe Bagh; Wendy Miller  
**Subject:** RSP Response - Proposed Bylaw No. 4179

Hi Iain,

Thank you for the opportunity to provide referral comments on the proposed amendments to the Forestry (AF) zone in the Juan de Fuca Land Use Bylaw. Comments from Regional and Strategic Planning are provided below. Comments relate to a review of the proposed amendment against the 2003 Regional Growth Strategy (RGS) Bylaw No. 2952. Staff note a policy matter to consider from an RGS perspective.

The 2003 Regional Growth Strategy (RGS) designates the planning area covered by the AF zone as Renewable Resource Lands Policy Area.

- 1) **RGS Action 1.2(2)** is to ensure the long-term protection of the Renewable Resource Lands Policy Area and to support farming within the Agricultural Land Reserve (ALR) and forestry and silviculture within the Forest Land Reserve (now called Privately Managed Forest Land [PMFL]). Almost all of the land within the AF zone is enrolled in the PMFL program.

Bylaw 4179 proposes to add agriculture uses to lands within the Renewable Resource Lands Policy Area that are within the PMFL. The proposed agriculture uses could result in a move away from forestry and silviculture, depending on the scale of agriculture use uptake across the JdF EA. A potential impact could be a change to landscape character. From an RGS perspective, the change would maintain the rural working landscape function but represents a change in policy from supporting forestry uses within the PMFL.

The above being said, allowing agriculture uses would provide an alternative working landscape function should land be removed from the PMFL program. Note that unlike the ALR, the PMFL does not protect land for forestry uses. Rather, the PMFL is a tax assessment class that provides incentives for ongoing forestry use and wise forestry management practices. When land is removed from the PMFL, underlying zoning applies.

- 2) **RGS Action 1.2(3)** is to generally limit rural subdivision and development to the designated Official Community Plan capacity levels as determined at the date of adoption of the RGS. No changes to residential density are proposed, in line with policy 1.2(3).

Please let me know should you have any questions.

Emily

**Emily Sinclair** MCIP, RPP  
Planner  
Regional and Strategic Planning

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RESPONSE SUMMARY – BYLAW NO. 4179


☒ Interest Affected by Proposal for Reasons Outlined Below

☐ Interest Unaffected by Proposal

Comments:

The loss of forested land classified as AF to other land uses such residential use and agriculture has been a concern to many residents of communities within regional districts. I commented on the Otter Point official community plan (OCP) a few years ago for the Ministry of Forest, Lands and Natural Resource Operations (FLNRO); South Island Natural Resource District (SINRD) and it was apparent that the community and regional district planners favoured treed greenspaces. The amount of development including increased housing density resulting in the permanent loss of greenspace was a significant concern to the extent that there were discussions about harvesting operations on Crown land within the Provincial Forest including the T'sou-ke First Nation Woodlot 1526. The conversion of forested land to agricultural is considered permanent deforestation resulting in the loss of greenspace. Crown land within w1526, TFL61 and the timber supply area managed by BC Timber Sales within the Otter Point and Shirley/Jordan River OCP areas will continue to be managed for forest resources including harvesting and reforestation (silviculture). The regional district and the communities must not set the expectation that the loss of treed greenspace due to agricultural use can be offset by placing restrictions against harvesting on Crown land through future changes to land use bylaws. FLNRO will continue to issue cutting authorities on Crown land within the Provincial Forest on the various tenures mentioned above as dictated by Provincial Legislation. Crown land within the OCP areas will continue to be managed for forest resources including, in part, timber production and wildlife and it is not intended to be used as permanent reserves to offset the loss of greenspaces through the conversion of AF classified lands to agriculture use.

Please contact Rob Furness, RPF at 250 731-3023 if you require further clarification.

 Signed	Robert Furness 2017.07.20 15:07:55 -07'00' Title	Authorizations Forester
July 20, 2017 Date	FLNRO Agency	

x   Interest Affected by Proposal for Reasons Outlined Below

     Interest Unaffected by Proposal

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PPSS-565060356-2970

## REFERRAL COMMENT



**TO:** CRD Planning staff

**SUBJECT:** District of Sooke Response to referral request  
Addition of Agricultural Uses to the Forestry Zone  
Bylaw No 4179

**DATE:** July 19<sup>th</sup>, 2017

The District of Sooke has concerns with the proposed Proposed Bylaw No. 4179 as residents have recently stated through the Official Community Plan public engagement process that their number one goal is *to protect the local environment and Sooke's natural surroundings*. The District has concerns that introducing livestock and farming practices into Sooke's surrounding native landscape will forever alter the ecosystem of the forest, compromise local watersheds and alter the landscape that is of great value to locals and our tourism industry. The impact that the change in use from Forestry to Agricultural has on the greater population should not be outweighed by the few who will benefit from farm practice when many local farmlands currently lie fallow.

Please note the Environmental goals of the current District of Sooke Bylaw 400, *Official Community Plan*:

- Sooke shall take responsibility for a sustainable, positive community future by ensuring the on-going health of the natural environment, *both within and surrounding Sooke*; and
- Sooke shall identify, *protect, enhance, and create environmental resources for the long term* of wildlife, natural ecosystems and the enjoyment of the present and future population and visitors to the District of Sooke.

Also, key future directions for the upcoming revised OCP include:

- **Preserve Ecosystems:** *monitor finite resources, preserve habitat and wildlife corridors*

The introduction of Agricultural use on surrounding Forestry zoned lands, will have negative and irreversible effects on local wildlife and their habitat, native ecosystems, watersheds and reduce the local carbon sink. Expediting deforestation will also hasten climate change. These effects will have a significant impact on Sooke residents and the beauty of Sooke's unique forestry-based landscape, tourism industry, local economy, and culture.

Recent OCP direction from the community regarding food security includes:

- **Secure our Food:** *support and celebrate our local farms and their employees, promote and market value added products, the harvest, local markets and artisans.*

While most residents in Sooke support the notion of food security, the District of Sooke contains only 3 percent of the region's ALR lands. However, over 9 percent of the District is made up of ALR land, most of which lie underutilized or fallow.

The District of Sooke *Agricultural Plan (2012)* notes that the reason for the decrease in number of farm operators can be attributed to the high cost of entering farming (land, equipment), the lack of interest by young people in becoming farmers and the low pay. Forestry lands are generally less expensive to purchase than agricultural lands. It appears that the proposed zoning changes may have come forward considering real estate costs of Forestry lands being less than those zoned for Agricultural uses.

A final direction provided through our recent public engagement process includes verbiage for the future:

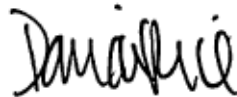
- **Plan for future generations:** *Protect and secure public views and access to the waterfront, develop partnerships to acquire key natural, cultural, or human assets when opportunities arise.*

Impacts to the local environment, climate change and surrounding natural landscape are not only contrary to the District of Sooke's OCP as outlined in paragraph 2, but also against three of the CRD's *Regional Growth Strategic Plan* goals.

1. *Keep urban settlement compact*
2. *Protect regional green and blue spaces*
3. *Manage natural resources and the environment sustainably*

Thank you for the opportunity to provide insight on this important bylaw. Please feel free to contact me for further discussion and for any questions.

Sincerely,



Danica Rice, MEdes, RPP, MCIP  
Planner II

District of Sooke  
2205 Otter Point Road  
Sooke, British Columbia, V9Z 1J2  
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## IMPORTANT BACKGROUND INFORMATION

The following excerpts outline the value of second growth forest ecosystems and provide insight on some of the local environmental impacts that would result if agriculture were introduced into Sooke's surrounding CRD Forestry (F) zoning.

**Future older forests** – Within 20 years, many of the Second Growth Forests that were logged early this century will become Older Forests. The biodiversity values of second growth forest generally become higher with age. This means it will be able to sustain more and larger species of plants and animals.

**Landscape connectivity** – Second Growth Forest stands provide connections between other natural areas that promote the movement and dispersal of many forest dwelling species across the landscape. Species as varied as black-tailed deer, black bears, northwestern salamanders, and northern flying squirrels use second growth forest for a large portion of their lifecycle, but also require access to other habitat patches for feeding, breeding, or migration. Fragmentation is an important conservation concern.

**Buffers** – Second Growth Forests can minimize disturbance (such as residential use) to sensitive ecosystems that occur within or adjacent to the forest patch. Where they border or surround wetlands, patches of older forest or other sensitive ecosystems, the second growth area serves an important role in buffering the adjacent sensitive areas.

**Conservation concerns of Older Second Growth Forest Ecosystems**—Larger stands of second growth forest provide landscape level connectivity and support larger species with larger home ranges. The high biodiversity values of second growth forest come, in large part, from its function in landscape connectivity. For this reason, preventing fragmentation of this ecosystem is especially important. Logging is the most significant cause of second growth forest decline.

### **Forest Types: Develop with Care Standards, Ministry of Environment 2014**

Much of the region is in the Coastal Western Hemlock bio-geoclimatic zone. These 'temperate rainforests' are complex and highly productive ecosystems, with a variety of habitats for birds and mammals. Because these forest soils are generally nutrient poor, fungi and seedlings depend on fallen trees, while the forest canopy provides habitat for lichens, mosses, and insects. Where there are gaps in the canopy, understory vegetation flourishes, supplying forage for Roosevelt elk and other wildlife. The many streams are excellent habitat for fish and other aquatic species.

The Coastal Douglas-fir Zone is found only in the southwest corner of British Columbia, along the east coast of Vancouver Island, the Gulf Islands and parts of the Lower Mainland. The Coastal Douglas-fir zone contains a wide diversity of ecosystems including woodlands, rocky outcroppings, coastal bluffs and wetlands. In upland areas Douglas-fir are found in association with salal and Oregon grape. Garry Oak and Arbutus grow with the Douglas-fir in rocky outcrop areas, together with other drought-tolerant species such as Baldhip Rose, Snowberry and Oceanspray. Moist areas support Grand Fir, Western Redcedar, and Bigleaf Maple together with Sword Fern, Salmonberry and Trillium as the understory.

**The Coastal Douglas-fir Zone is one of the smallest and most endangered biogeo-climatic zones in British Columbia and has the highest number of species at risk per unit area of any zone in B.C. (Holt 2001)**