

Appendix 2: Referral Comments

Wendy Miller

From: Matthew Baldwin <mbaldwin@cityoflangford.ca>
Sent: Wednesday, August 09, 2017 3:52 PM
To: Wendy Miller
Subject: RE: Rezoning Application RZ000245 (3950 Goldstream Heights Drive) - CRD Referral

Hi Wendy,

Thank you for the referral. The City of Langford generally does not provide comment on neighbouring land use decisions.

Matthew G. S. Baldwin, MCIP, RPP
Director of Planning and Subdivision



City of Langford
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RESPONSE SUMMARY – REZONING APPLICATION RZ000245

___ Interest Affected by Proposal for Reasons Outlined Below

☒ Interest Unaffected by Proposal

Comments:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Signed Neil J. Jett Title MANAGER COMMUNITY/REG. PLANNING


2017/07/26 C.V.R.D.
Date Agency

RESPONSE SUMMARY – REZONING APPLICATION RZ000245

- ☒ Interest Affected by Proposal for Reasons Outlined Below
☐ Interest Unaffected by Proposal

Comments:

See attached comments by Island Health.


Signed _____ Title Environmental Health Officer
Aug 10, 2017
Date _____ Agency Vancouver Island Health Authority

Recommendations:

1. This rezoning is to allow for a Health Canada licensed medical marijuana production facility. As a licensed facility it will be subject to federally established practice standards. However, particular attention should be given to odour control containment measures for this operation. Studies have shown that exposure to environmental odours can lead to physiological stresses that may cause headaches, nausea, loss of appetite, and emotional disturbances. Exposure to odours may also exacerbate underlying medical conditions. Good odour control practices at the facility level will help reduce/eliminate these risks. If odour problems prevail, in addition to the physiological stress it can cause, there is the added risk of people remaining in the indoor environments as there may be reduced enjoyment in the outdoor environment. This in turn can have negative impacts on physical activity as well as engagement with nature. Both physical activity and engagement with nature has been shown to reduce stress and risk of chronic diseases for an overall improvement in health outcomes.
2. The property is designated as Settlement Area under the Malahat OCP, with residential land use as a predominant land use. Ideally there would be sufficient buffer zones, achieved through zoning designations, in place between a medical marijuana facility and residential use, as well as campground and other outdoor recreation uses, as proposed in this application. In this case, the proposed facility is to be located on a shared site as a campground with various outdoor recreation uses. Island Health is concerned with the capability of these uses. Significant separation between the uses, through linear separation and treed areas, should be considered as a minimum.
3. Consideration should be given to the accessibility of the campgrounds/recreation areas. Ideally, access would be provided for all ages and abilities. As the population of the province is aging, consideration in the design and construction for people with limited mobility can add value to the site.
4. It is vital that any conditions placed on development permits for this site as it pertains to the OCP are adhered to for the protection of the natural environment and the safety and well-being of the population.

Regulatory:

1. The Health Protection and Environmental Services (HPES) department in Island Health have a regulatory role in food premises and recreational water (pools and hot tubs) from construction to operation. Any changes to the existing food premises and the possible construction of new food premises and pools must be undertaken with the appropriate construction and operating permits.
2. Under the *Drinking Water Protection Act* and *Regulation*, any construction, installation, alteration or extension of the water supply system must be issued a construction permit from our Public Health Engineer (for more information: <http://www.viha.ca/mho/water>).

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3. Ideally the sewage disposal system (although not planned for right away) should be located and the area reserved, to ensure set-backs as well as the selection of the most suitable area (topography and soil profile) as well as the ability to maintain set-back distances.

Highlights:

1. The addition of hiking and biking trails will provide an opportunity to access nature. Health evidence shows a strong link between exposure and engagement with nature and the reduction of stress, chronic diseases, depression and anxiety as well as improvements in cognitive functions.
2. Outdoor recreation facilities, such as the proposed mini-golf, swimming pool and biking trails, will encourage visitors to increase physical activity, which in turn, leads to overall improvements in emotional and physical wellness, and can help lessen obesity rates and decrease the risk of chronic diseases.
3. The proposed plan to build separate trails for hikers and bikers is commendable, as it accounts for risk or perceived risk of shared trails for the different activities. It will allow hikers to enjoy the nature experience without concern of collision with a bike.

RESPONSE SUMMARY – REZONING APPLICATION RZ000245

☒ Interest Affected by Proposal for Reasons Outlined Below

☐ Interest Unaffected by Proposal

Comments:

Because of the steep slopes and environmentally sensitive habitats on the property, located at 3950 Goldstream Heights Drive, we recommend that rezoning and any subsequent development only proceed under the following conditions:

- That the property retain the existing development permit area designations (*Steep Slopes, Sensitive Ecosystems and Watercourses, Wetlands and Riparian Areas*)
- That Covenant FB0423199 protecting environmentally sensitive habitats and species on the property remain on title.
- That before a development permit is issued for the proposed development that a detailed biological inventory be conducted by qualified environmental professionals (R.P.Bio. designation) for the entire property focusing on red and blue listed plants, animals and plant associations. A plan protecting any features found should be developed and made available for review before the issuance of a development permit.
- That a geotechnical study be completed by qualified professionals (P.Geo. or P.Eng. designations) before the issuance of a development permit to assess the potential for mass wasting and severe erosion in the project area.

Should the proposed development proceed:

- We recommend that vegetation clearing be minimized and occur outside the nesting period from March 1 to August 31 to reduce impacts on all bird species. A search for the nests of birds (eagles, peregrine falcons, gyrfalcon, ospreys and herons) protected under Section 34(b) of the *Wildlife Act* should be conducted before the start of vegetation clearing. Should the nest of a bird requiring protection under Section 34(b) of the *Wildlife Act* be located, please refer to the recommended buffer distances in Table 4.1 (Section 4) of *Develop with Care: Environmental Guidelines for Urban and Rural Land Development in British Columbia (MOE 2014)* available at <http://www.env.gov.bc.ca/wld/documents/bmp/devwithcare/index.html>.
- Follow other relevant best management practices in *Develop with Care*.
- Maintain post-development stormwater discharge rate and water quality as close to pre-subdivision levels as possible.

Should you have any questions regarding our response, please do not hesitate to contact the undersigned.

Dr. Grant Baecher PAg, RPBIO

DR. GRANT BAECHE

Signed

ECOSYSTEM BIOLOGIST

Title

FOREST, LANDS AND NATURAL
RESOURCE OPERATIONS

Date

JULY 20, 2017

Agency

Wendy Miller

From: Berube, Nikki TRAN:EX <Nikki.Berube@gov.bc.ca>
Sent: Thursday, July 20, 2017 1:05 PM
To: Wendy Miller
Subject: RE: Rezoning Application RZ000245 (3950 Goldstream Heights Drive) - CRD Referral

Hi Wendy,

Please accept this as official response from the Ministry of Transportation and Infrastructure.

The Ministry has no objections to the proposed rezoning of 3950 Goldstream Heights Drive and designation as Commercial DP Area.

Any issues the Ministry may have will be dealt with upon subdivision.

Thank you,

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



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Wendy Miller

From: Berube, Nikki TRAN:EX <Nikki.Berube@gov.bc.ca>
Sent: Friday, September 22, 2017 9:05 AM
To: Emma Taylor
Cc: Wendy Miller
Subject: Rezoning Application RZ000245 (3950 Goldstream Heights Drive)
Attachments: 2017-04719 comments.pdf

Good Morning Emma,

Please accept this as an amendment to the original response from the Ministry of Transportation and Infrastructure in regards to the rezoning application for 3950 Goldstream Heights Drive; MOTI File 2017-04719 and your file RZ000245. (original email attached)

The Ministry has no objections to the proposed rezoning subject to but not limited to the following conditions:

- The Ministry is requesting that a Traffic Impact Assessment be completed by the applicant. The scope of the assessment to include the impact on the Goldstream Heights Dr/Stebbing's and Stebbings/Shawnigan Lake Rd intersections as well as any mitigation efforts proposed to deal with those impacts.
- Access to the parcel is currently limited to easement. It is undesirable for access to a commercial property to be via easement and therefore the Ministry would like to request that the property owner wait until legal access is provided via public road through the construction and dedication of road in conjunction with the subdivision of the parcel to the north.
 - o Construction of primary access over 'unconstructed' road dedication is possible through permit application with the Ministry of Transportation and Infrastructure.
- Alternative access proposals can be discussed with the Ministry.

Should you have any questions in regards to the comments above, please let me know.

Have a great day!

Nikki Bérubé

District Development Technician
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Wendy Miller

From: LARRY CHOMYN <larry.chomyn@rcmp-grc.gc.ca>
Sent: Friday, July 28, 2017 11:34 AM
To: Wendy Miller
Cc: Scott Stephen
Subject: Fwd: Rezoning Application RZ000245 (3950 Goldstream Heights Drive) - CRD Referral
Attachments: Fwd: Rezoning Application RZ000245 (3950 Goldstream Heights Drive) - CRD Referral

Hello Wendy,

I was forwarded the email and information regarding a possible re-zoning of land in the Goldstream Heights area for camping, RV's, cabins, amusement site and a commercial marijuana grow operation. The Campground itself is said to be estimated at 150 RV's sites, 50 campsites, 10 tourist cabins, as well as an outdoor amusement facility such as mini-golf, swimming pool, and mountain biking facility. It also includes a provision for a commercial Medical Marijuana grow operation.

I am writing to reply to this and express concerns from the West Shore RCMP. Please accept this email as my submission.

As background, the Goldstream Heights area is within the boundary of the West Shore Detachment. This is a challenge for the West Shore Detachment as the only access to that area is for members of the West Shore Detachment to drive up the Malahat, into the Shawnigan Lake area (Shawnigan Lake Rd turn off) and backtrack to the Goldstream Heights area. Further with the on going constructions and highway delays access to this area for West Shore members can exceed an hour of travel time one way and immediate and rapid response is difficult at best.

Due to the isolated location of this area RCMP policy requires that the Detachment would respond to calls for service in this area with a minimum of two members, and possibly more depending on the nature of the call.

As you can imagine, calls for service to this area are a significant drain on West Shore resources and may result in a shortage of available members for the remainder of the West Shore area.

The West Shore Detachment has 5 provincially funded regular members. These resources are funded due to the Provincial areas including the CRD, Metchosin, and Highlands. The remainder of the Detachment strength consists of Municipally funded regular members. Any calls for service to this area would result in a municipally funded member having to attend as part of the response team, and ultimately place the Detachment in an operationally challenged position where there are delays for service to that area, while the municipally funded member is responding to the Goldstream Heights area.

I have also had discussions prior to receiving your email and have been advised there are no immediate or foreseeable plans to connect roadways to the Goldstream Heights area, which would reduce the travel time for RCMP Members to respond via Langford.

Logistically, any growth and development in this area will be a challenge and drain on the West Shore Detachment to police. Should this proposal go forward, or an increase in residential housing in the area occur, the CRD would need to turn their minds to arranging additional police resources for the West Shore Detachment to ensure sufficient coverage for this area and all of the areas of provincial police responsibility we police.

Specifically speaking to this proposal, it is silent regarding any request or application for liquor permits. As you can imagine, this in itself would have an impact on policing demands and I would recommend this is explored and clarified prior to any re-zoning or approval for commercial ventures.

The size and scope of the campground proposed will bring in a significant amount of traffic and temporary land users to the area. This may result in increases to traffic congestion and accidents, not to mention general calls for service and possible fire risks. It can also be anticipated that having a campground and commercial venture would increase demands for police presence and preventative patrols. As noted above, the Detachment is not resourced to extend our routine patrols into this area without significantly affecting Operations at the Detachment.

In regard to the application for the Commercial Medical Marijuana facility. The Detachment has not received any permits, requests, or information regarding an application. We have no information regarding who the applicant is or what that individual or groups background is. In general terms there are concerns around commercial facilities and security. Both Commercial and illegal grow operations can attract an element of criminal activity and be subject to break and enters up to armed invasion from criminal elements seeking the drugs. This returns us to the issue of the isolated location and difficulty members would have in responding to and accessing the location, especially in a timely manner.

As you can imagine commercial marijuana grow operations involve a large amount of light and electricity. This may result in increased fire risk and may involve a variety of chemicals as part of the grow operation. From a policing point of view, when we enter marijuana grow operations they are deemed to be hazardous environments and require special protective gear. Fire and emergency response protocols and coverage would have to be a consideration. I cannot speak to fire coverage for this area or what contingency plans would be in place. for such a commercial operation.

Finally, with a campground in close proximity to the commercial marijuana grow operation there would be concerns about the security of the facility and implied messaging of a "family" campground beside such a commercial venture. As you are likely aware, the various communities of the West Shore have not been supportive of commercial enterprises involving the marijuana industry. The West Shore currently does not have any medical marijuana dispensaries within the policing boundaries.

I wish to offer my appreciation for reaching out and soliciting the West Shore Detachment input regarding this matter. It would be appreciated if an update could be provided on the results of the CRD decision on this matter. I have also copied the Detachment Commander for Shawnigan Lake. If this proposal and re-zoning proceeds and the development moves forward this would also impact their Detachment area as ingress and egress from the area is through their jurisdiction.

Sincerely,

Larry Chomyn

Insp. Larry Chomyn
Officer in Charge
West Shore Detachment

From: Wilf Marquis
Sent: Friday, July 21, 2017 8:32 AM
To: Wendy Miller <wmliller@crd.bc.ca>
Subject: RE: Rezoning Application RZ000245 (3950 Goldstream Heights Drive)

Interesting proposal for an RV park campground and then in a corner of the property the ability to have a medical marihuana facility. In comparison to one of your previous proposals (Rezoning Application RZ000247-Sooke Business Park) where the uses around it are within an Industrial Park in the Electoral Area, which seems more suitable for such a use. I guess it's a sign of the times, but seems in my mind to be somewhat out of place or conflicting, although being Federally regulated should mitigate many concerns of security, nuisance, etc.

As outlined in the proposal I could foresee the biggest concern for nearby resident be the volume of traffic to and from the RV campground site being the limited access, albeit this is the case in many such facilities.

Wilf MARQUIS
Senior Bylaw Officer

Bylaw and Animal Care Services
212-2780 Veterans Memorial Parkway, Victoria, BC, Canada V9B 3S6
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**Comments on Rezoning Application RZ000245 for Block 1043 Malahat District
CRD Integrated Water Services**

Integrated Water Services has been asked to comment on Rezoning Application RZ000245 for Block 1043 Malahat District. The subject property is located directly adjacent to Sooke Hills Wilderness Regional Park. The property is proposed to be rezoned for 150 RV sites, 50 tent sites, 10 tourist cabins, amusement facilities including mountain bike facilities, and a medical marijuana processing plant, which represents a substantial shift from the current zoning. This is a particular concern given that the property is outside of the Malahat Fire Protection Service Area.

The western boundary of the subject property is adjacent to Sooke Hills Wilderness Park. From this boundary it is about 675 m in a straight line to The Great Trail running through the park and about 2.3 km to the catchment boundary of the Goldstream Water Supply Area. The portion of the park immediately west of The Great Trail is designated as a no-public-access Drinking Water Protection Zone. There is no existing road connection between the property and the park. However, a road has been developed directly adjacent and parallel to the park boundary.

The proposed development would create one of the larger campgrounds on Vancouver Island. When full it is estimated that there could be 420-840 persons (2-4 persons per site/structure) on the property in the summer. The cabins and most of the RV and tent sites would be located very close to the boundary of Sooke Hills Wilderness Regional Park. Neither the development plan nor the draft bylaw for the rezoning make a clear mention of a setback from the property line for the development of facilities.

Integrated Water Services has three major concerns related to the proposed development: 1) the potential for a fire starting on the property to spread into the adjacent regional park; 2) the potential for unauthorized recreation into Sooke Hills Wilderness Regional Park and the Goldstream Water Supply Area; and 3) additional staff time needed for patrols and enforcement.

Potential for Wildfire

The large number of people that would be concentrated adjacent to a forested natural area during the height of wildfire season is a major concern. A fire starting near the park boundary could quickly spread into the relatively dense forest in the adjacent park. The terrain in the park would facilitate a wildfire spreading west toward the Goldstream Water Supply Area. Since the property is outside of the Malahat Fire Protection Service Area, it will be extremely important that there is an adequate water supply, wildfire suppression equipment, and people trained in wildfire suppression on site during wildfire season. While the developer states that there is adequate water and a fire pump on site, this should be evaluated by a person with expertise in fire protection and if this is not adequate additional capabilities should be required.

Potential for Unauthorized Recreation Access

Given the relatively small size of the undeveloped area of the property with the proposed development plan, it is extremely unlikely that any trail development on the property will be adequate to satisfy the number of people that could be present. Therefore people staying on the site will be looking for recreational opportunities in other areas.

The proposed development plan has RV parking and tenting sites almost directly adjacent to the park boundary so it seems inevitable that people will develop informal trails into the park. The potential for people and domestic animals to encounter wildlife and leave behind waste in the park is a concern.

An even greater concern would be if people and domestic animals from the property entered the Drinking Water Protection Zone and continued west until they reached the Water Supply Area. There should be education and signage to inform park visitors to stay on established trails on the property and to only enter Sooke Hills Wilderness Park and the Great Trail through designated access points. Ideally some form of fencing would be installed along the park boundary to prevent unauthorized access. Education messages and trail maps should be developed in consultation with staff from CRD Regional Parks.

The intent to attract mountain bikers is also a concern. Mountain bikers are capable of travelling longer distances to hikers and may not be content to stay to the property. While it is possible for the mountain bikers to stay to existing roads to access and follow The Great Trail, there is the potential that they will develop new trails or try to access existing roads linking the Great Trail, the Drinking Water Protection Zone, and the Goldstream Water Supply Area. Again education, signage, and barriers would be required to ensure mountain bikers were aware of access constraints and the location of authorized trails.

Potential for Increased Staff Time

Given the potential for increased potential for wildfire and unauthorized recreational access, Watershed Protection and Regional Parks staff will likely be tasked with more patrols in the vicinity of the property if the proposed development proceeds. If authorized people are encountered additional time will be required for education and enforcement.

Conclusions

IWS is very concerned that the type and scale of the proposed development would increase the threat of wildfire and unauthorized access to Sooke Hills Wilderness Regional Park and the Goldstream Water Supply Area. If such a development was allowed to proceed, considerable staff time could be required to monitor and enforce compliance with CRD bylaws relating to the park and water supply area, and work with the developer to put measures in place to reduce unauthorized access to CRD lands from the property. Given these factors, IWS does not support the rezoning of the property.

If the rezoning was to be granted, we strongly recommend that a number of conditions be attached:

- Adequate equipment and water supply for wildfire suppression as judged by a person with expertise in wildfire protection, and personnel with provincial certification in wildfire suppression on the property full time during wildfire season
- Provincial campfire and burning restrictions are to be followed on the property without exception and local CRD wildfire danger indices to be used to guide restrictions on the property in advance of an outright campfire ban
- Fencing and signage on the boundary of the regional park to avoid people exploring into areas where there are no trails or facilities

- Information provided to all campers and recreationalists on the property showing the authorized access points to The Great Trail and authorized trails for mountain bikes

Thank you for the opportunity to provide comments on this Rezoning Application.

Joel Ussery, MRM
Manager, Resource Planning
Watershed Protection Division
CRD Integrated Water Services

From: Peter Ensor
Sent: Thursday, July 20, 2017 3:16 PM
To: Iain Lawrence <ilawrence@crd.bc.ca>
Cc: Shawn Carby (<scarby@crd.bc.ca> <scarby@crd.bc.ca>); Ian Elliott <ieliott@crd.bc.ca>
Subject: RE: Rezoning Application RZ000245 (3950 Goldstream Heights Drive)

From a Protective Services perspective this application raises the following concerns

- 1) Proposed occupancy has the potential to bring a significant number of overnight user into the area. In the event of incident occurring a second means of ingress/egress will need to be provided for.
- 2) It is appreciated that there may be a water source(s) on site however firefighting personnel are not be provided for on a 24/7 basis
- 3) Any chemicals/combustible/explosive material being stored in support of the agricultural facility create conditions so as to endanger life, particularly of overnight users. Adequate separation distances would be required.

PE



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August 14, 2017

**Regional Park Comments on Juan de Fuca Rezoning Application RZ000245
(3950 Goldstream Heights Drive)**

Regional Parks has been asked to comment on Rezoning Application RZ000245 for Block 1043 Malahat District. The subject property is located directly adjacent to Sooke Hills Wilderness Regional Park. The property is proposed to be rezoned for 150 RV sites, 50 tent sites, 10 tourist cabins, amusement facilities including mountain bike facilities, and a medical marijuana processing plant. The proposed development would create one of the larger campgrounds on Vancouver Island.

Regional Parks' staff have several concerns with the proposed rezoning application, as follows:

Unauthorized Access into the Regional Park

- If developed as proposed, there could be in the order of 420-840 persons (2-4 persons per site/cabin) using the area at any one time, which could significantly increase the risk of informal accesses and trails being developed by campground users from the property in question into the adjacent Sooke Hills Wilderness Regional Park. This is a major concern to Regional Parks because of a significant "Sensitive Environment" zone located between 3950 Goldstream Heights Drive and the existing designated trail within Sooke Hills Wilderness Regional Park (Sooke Hills Wilderness Trail, which is part of The Great Trail). Trails and informal use through this sensitive environment could have significant impacts on the natural environment that the regional park was established to protect. It should be noted that the closest/only designated access to the Sooke Hills Wilderness Trail/The Great Trail in the vicinity is at Trail Way (road), approximately 4 km north of the property. No other access points will be permitted along the east boundary of the regional park.
- Such an intensive development could also increase the potential for public access into areas closed to public access, in particular the Drinking Water Protection Zone within Sooke Hills Wilderness Regional Park and the Greater Victoria Water Supply Area, both located to the west. This could increase the need for on-going monitoring and enforcement that is above the capacity of CRD's Regional Parks and Integrated Water Services divisions.
- If commercial recreation development is permitted, hiking opportunities on their property should be developed well away from the regional park boundaries to lessen the potential for encroachment/access into the regional park. In addition, a significant barrier to prevent clients of the development from entering the park from this location, such as a high fence with appropriate signage, should be installed and maintained by the property owners, along with a concerted effort to educate clients about the importance of not entering the park from this location.

Wildfire Risk

- The development of an intensive use as proposed, would also significantly increase the risk of wildfire from campfires and smoking. This is of great concern given both the adjacent Sooke

Hills Wilderness Regional Park and the Greater Victoria Water Supply Area. With continued hot and dry summer weather, fire is an increasing threat and could have significant negative implications for the Greater Victoria water supply.

Excessive Visitation to Wrigglesworth Community Park

- The proposed development increases the potential for overuse of the small lake in the Wrigglesworth Lake Community Park and the potential creation of additional informal accesses between the Community Park and the Sooke Hills Wilderness Trail/The Great Trail. There is an active bear den in the west section of the park, between the lake and the Sooke Hills Wilderness Trail/The Great Trail, and significant increase in human use in this area could impact the wildlife using this natural area (or create increased potential for human-wildlife interactions).

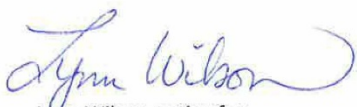
Aesthetic Impacts for Park Visitors

- Regional Parks would not be supportive of outdoor amusement facilities that could negatively impact the wilderness character of Sooke Hills Wilderness Regional Park or the scenic vistas from the Sooke Hills Wilderness Trail/The Great Trail.

Spread of Invasive Plants into Sooke Hills Wilderness Park

- With respect to rezoning the property to allow for a medical marijuana processing plant, in addition to a camping opportunity, Regional Parks' staff have concerns regarding the potential for the spread of the growing operations or the unintentional spread of marijuana plants through seed dispersal into the park. The development of such a facility adjacent to a large wilderness park and within a broader community of large lot residential does not seem like the appropriate location.

In conclusion, for the reasons noted above, CRD Regional Parks' staff do not support such an intensive level of commercial recreation development being proposed adjacent to Sooke Hills Wilderness Regional Park and the proposed medical marijuana processing plant adjacent to a wilderness regional park unless the concerns identified above can be satisfactorily addressed.



Lynn Wilson, acting for
Brett Hudson
Manager, Planning, Resource Management & Development
Regional Parks
Parks & Environmental Services

From: Emily Sinclair
Sent: Monday, October 02, 2017 3:15 PM
To: Wendy Miller <wmiller@crd.bc.ca>
Cc: Signe Bagh <sbagh@crd.bc.ca>; Iain Lawrence <ilawrence@crd.bc.ca>
Subject: FW: Rezoning Application RZ000245 (3950 Goldstream Heights Drive)

Hi Wendy / Iain,

Thank you for the opportunity to provide referral comments on the proposed amendment to the Malahat Official Community Plan (OCP). 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 do not identify any implications from an RGS perspective.

As identified in the Juan de Fuca Land Use Committee staff report, the CRD Board will consider the proposed amendment and make a determination of consistency with the RGS once the Land Use Committee directs first and second bylaw reading.

Designate the subject parcel as a Commercial Development Permit (DP) Area

The table below summarizes relevant RGS policies and offers an analysis of the proposed OCP amendment from an RGS perspective.

RGS Provision	Description	Analysis
Action 1.2(3)	Limit rural subdivision and development to the designated Official Community Plan capacity levels as determined at the date of adoption of the RGS.	The proposed DP designation does not impact rural subdivision and development levels.
Action 1.2(1) and (2)	Ensure the long-term protection of the Capital Green Lands Policy Area and the Renewable Resource Lands Policy Area by adopting policies to buffer policy areas from adjacent urban development.	The subject parcel abuts properties designated Renewable Resource Lands Policy Area to the north and east, and Capital Green Lands Policy Area to the south and west. The subject parcel is designated as Settlement Area in the OCP. The proposed DP provides for policies that could buffer the adjacent land from development through site design. It would be the responsibility of JdF planning to enact the DP provisions to ensure that the adjacent lands are adequately buffered from the proposed development.
Action 1.1(5)	Limit the extension of urban sewer and water services outside the Regional Urban Containment and Servicing Policy Area (RUCSPA)	The applicant is not requesting piped sewer or water service at this time. The applicant proposes to provide water by an existing well and sewage disposal by holding tank and trucking. Given the RGS provision limiting the extension of services, the applicant needs to be aware that piped sewer / water service would not be available in the future unless the RGS were to be amended.
Objective 5	Strengthen the regional economy.	The proposed commercial campground development provides an opportunity to diversify the economy through a tourism-focused venture.

Based on the analysis of the proposed OCP amendment, staff do not identify any implications from an RGS policy perspective.

Please let me know if you have any questions / comments.

Best,

Emily

Emily Sinclair MCIP, RPP
Planner
Regional and Strategic Planning

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