

Victoria Residential Builders Association

Below is VRBA's input regarding the Regional Sustainability Strategy:

The Regional Sustainability Strategy says there is a need for a significant shift from a 'business as usual' approach to one that is "bold and courageous..."

However, the RSS Land Use section does not accomplish that goal.

As part of achieving sustainability, the RSS refers to the mitigation of climate change and green house gas. Energy efficient housing is part of sustainability, but this also increases construction costs in one of the most expensive housing markets in North America.

BC has the highest average home price in Canada - \$589,650. The second highest is Ontario - \$435,352, a difference of about \$154,000. The lowest average price is in New Brunswick at \$150,000.

Higher density than identified in the RSS Land Use section is going to be necessary if our goal is affordable energy efficient housing. Growth Centres with low and medium density are not compatible with this goal in our market.

Partly due to the cost of housing, we have a declining population in some regions, and minimal growth in others. BC's average population growth was +7% according to the 2011 census vs 2006.

Sidney's population declined -1% while small increases were in Central Saanich +1%; Saanich +1%; Oak Bay +1%; North Saanich +3%.

Coincidentally, there has been significant growth in one of the few urban areas encouraging more affordable small lot subdivisions and efficient development processes – Langford at +30%.

RSS objectives include "economic development" and "cost-effective infrastructure."

This should be achieved by creating vibrant urban centres enabling local businesses to thrive. Some major companies in the peninsula area are being held back due to a lack of housing affordability for their employees, which may cause the companies to relocate. The existing low-density community "nodes" with "village character" lack vibrancy, housing variety, and affordability to attract employees in high-tech industries, which are often knowledge-based and sustainable.

The RSS language claims to support a strong vision, but the low-density Land Use policies fall short.

Creative, well-designed high-density land use supports housing affordability, community vibrancy, and economic development while protecting green space.

Compact high-density communities result in more efficient urban systems delivering services at less cost per unit. Human scale is achieved through building masses stepping down to open spaces using arcades and pavilions as buffers. Communities connect by a variety of transport systems including cycle paths, walkways, bus lanes, light rail corridors. Higher density in urban areas promotes affordability and vibrancy while protecting agricultural land, ecosystems and recreational areas.

An example of a past, strong planning initiative is Calgary's Light Rail Transit system.

In 1980, Calgary began building their Light Rail Transit system when they had a population similar to Greater Victoria's today. At the time, there was debate about whether Calgary's population was sufficient to embark on such a project. The planners successfully argued LRT must be built early to manage growth and not after growth has occurred. Thirty-five years later, Calgary has a population of over a million people, and the LRT was an important part of their planning and development.

They were able to accomplish this partly because Calgary has a ward system. Communities like Oak Bay exist, but they exist as part of a single municipal council, where their representatives must work together on issues that impact the region. Unified municipalities are simply more effective at addressing regional issues.

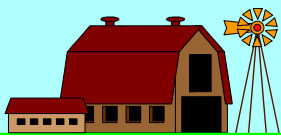
That said, while municipal amalgamation may not be on the table, the CRD is encouraged to create a strong vision statement for the region that supports both sustainability and affordability.

Thank you for the opportunity to provide input to the RSS.

Sincerely,

Casey Edge
Executive Director
Victoria Residential Builders Association
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Peninsula & Area Agricultural Commission

c/o Saanich Municipal Hall
770 Vernon Avenue, Victoria, B.C. V8X 2W7
Telephone: (250) 475-1775 Fax: (250) 475-5440
Secretary: Isobel Hoffmann, isobel.hoffmann@saanich.ca
Co-Chairs: Bob Maxwell & Jack Mar

March 15, 2015

CRD Board
Planning and Protective Services
Regional and Strategic Planning
Capital Regional District
625 Fisgard Street
Victoria, BC V8W 2S6

Dear CRD Board

RE: Comments and Feedback on the Draft Regional Sustainability Strategy – RSS.

Thank you for the opportunity to respond to the draft Strategy.

The Peninsula and Area Agricultural Commission, PAAC, (originally the Peninsula Agricultural Commission) developed its *Agriculture Strategy for the Saanich Peninsula* in June 1997. The District of Metchosin and Juan de Fuca Electoral Area has since joined the Commission.

Our commission supports the Draft Regional Sustainability Strategy – RSS. Basically, we have had the same objectives and a working / supportive history for 18 years.

Our Background

PAAC's Mission and Objectives : *as they relate to the CRD draft Strategy:*

- We support the Agricultural Land Reserve as a means of preserving farm land for future generations.
- Mission: To ensure the sustainability of the Saanich Peninsula's Farm Community, (now including Metchosin and Juan de Fuca)

Objective #1:

To secure an adequate supply of water to farms at a competitive cost, and to protect the community's interest in a secure supply of ground and surface water of a quality appropriate to farm needs.

Objective #2:

To increase economic returns to Farmers. (*see attachment 'PAC Strategic Plan' of details for each objective*).

Objective #3:

To Enhance the Sustainability of the Agricultural Land Base.

Objective #4:

To Foster Stewardship of Farm Land Which Embraces Environmental and Other Community Values.

Objective #5:

To increase Public Awareness, Education and Support for a Sustainable Farm Community.

Objective #6:

To Establish a Continuing Focal Point For Farm Issues and Implementation of the Strategy.

With respect to PAAC's projects, municipal and farm support we have:

Participated in and agreed with the Districts of North Saanich, Central Saanich and Saanich as to their

- OCP's agricultural sections where sustainability, farm and food statements support farmland and farmer sustainability;
- Promoted the development of Agricultural Area Plans for North Saanich and Central Saanich; here we participated in and approved these plans, significant mention of sustainability and positive farmland initiatives are documented.
- Promoted and participated in a large CRD Agricultural Water Use study to understand water use and promote sustainable consumption.
- Included CR-FAIR as a member to our Commission and to accept and help with their approaches to a more sustainable food system, and promote connections with rural growers and city consumers.
- Promote the Environmental Farm Plan Program to protect farmers and encourage sustainable farm practices.
- To participate in and encourage wetland improvement projects such as Durrell Creek (to facilitate better farmland drainage) as well as Martindale Flats, Panama Flats and Maber Flats.
- Participate in meetings and significant communications on regional compost use for farmers to build their soils.
- To initiate and participate in a Regional Canada Geese Management Plan and Program, and to participate in the CRD's Deer Management Program.
- To work with and provide input to municipal farmland acquisitions such as Panama Flats and the Sandown property.
- To encourage Municipalities to help with and develop strategies and plans to increase local food production, as related to reducing GHG and local climate concerns.

All of the Municipal Official Community Plans have significant policies and positions for working towards sustainable farming, food and environmental sustainability.

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At its April 10th 2014 meeting, PAAC considered a letter dated February 24 2014 from Central Saanich. PAC agreed with and supported this letter on Regional Services Supporting Agriculture: Input to the Regional sustainability Strategy and Food Systems Sub-Strategy. *An excerpt of the April 10th minutes, and a copy the February 24th letter is attached for reference.*

If the CRD would develop and adopt similar policies, we believe it will help significantly with agricultural sustainability.

As a side-note, the Regional Districts of the Cowichan Valley, the Alberni Valley and the Courtney-Comox area are very supportive and involved with agriculture and its economic potential.

We hope the CRD Board will find our comments useful. We look forward to seeing the policies set out in the Strategy come to fruition. Thank you for the opportunity to participate.

Sincerely,

Robert Maxwell, Co-Chair
Peninsula Agricultural Commission

cc: PAAC members
PAAC Council Liaisons: Councillors Derman, McLennan, Graham and Stock

Attachments:

- excerpt of PAAC minutes April 10, 2014
- letter dated February 24, 2014 from Central Saanich re RSS

Member Municipalities:
Saanich, Central Saanich, North Saanich, Metchosin and Sidney

Member Municipalities:
Districts of Saanich, Central Saanich, North Saanich & Town of Sidney

Excerpt of April 10, 2014 PAC minutes

CORRESPONDENCE

- Letters from Central Saanich, North Saanich and Sidney endorsing the Terms of Reference.
- Letter from Central Saanich addressed to the CRD providing input on the Regional Sustainability Study and Food Systems Sub-Strategy. (see discussion below on Farmland Trust).

REGIONAL AGRICULTURE & FARMING ISSUES (as related to discussions about a Farmland Trust)

At the March meeting, considerable discussion ensued regarding a proposal by Saanich to introduce a Farmland Trust, an issue originally raised by the Saanich Environment Committee. Saanich Council has referred the matter to staff to prepare a report on how such a trust would work. PAC had identified some issues and a brainstorming session was suggested for this meeting to consider the following:

- The present state of agriculture
- The issues farmers face
- The potential solutions to address these issues
- Form a sub-committee to take the lead on this topic
- Prepare a report defining the problems to assist Saanich staff

It was noted at the March meeting that PAC does not have to come up with solutions, just identify issues. Staff have the knowledge and resources to determine potential solutions.

The Chair passed along suggestions from Mike Romaine about gathering facts on the following:

- How many farmland trusts do we have?
- How long have they been in operation?
- How many acres are in farmland trusts?
- How do these farmland trusts affect established farmers?
- Who do the farmers utilizing the trust lands sell to and how do they market their produce?

After a brief discussion, it was realized that a lot of research has already been done on this subject and rather than expending more energy, we should collect the information, review, and consolidate into a concise report to submit to Saanich to assist them with the Farmland Trust Report, and include issues that need to be addressed:

- Central Saanich and North Saanich already have agricultural plans and have considered the first three points noted above.
- From a regional context, information has been collected for the Regional Sustainability Study and the Food Systems Sub-Strategy.
- Ramona Scott, Farm Folk – City Folk, has prepared a report which could be useful.

Other comments were noted as follows:

- Although frustrating to see good farmland sitting idle, the new property owners are essentially stewards of the land; it could be used again for food production or leased to a farmer.
- One of the roles of the CRD's food strategy is to provide opportunities for young farmers, such as leasing land.

- Linda Geggie and Mary Alice Johnson sit on the board of Linking Land and Farmers; information is posted on a website and there are great benefits (including tax benefits) to this programme, but more publicity is needed. Perhaps this is something PAC could help with, or it could be part of PAC's Saanich Fair display this year.
- Tenure is always an issue with leasing land.
- Developers are known to buy agricultural land, let it lie for a few years and then develop it.
- The timing of this report could tie in with the Regional Sustainability Study, although it was acknowledged with an election this fall, things might not move as quickly until after the election. It would be helpful to provide a copy of PAC's report to all CRD directors.
- Perhaps handouts could be prepared for the Saanich Fair or the harvest dinners organized by farm groups in the fall to gather more information and input from farmers.
- Noted that input has never been sought from the business and marketing side and perhaps this should be considered.

Formation of Sub-Committee:

It was agreed that Linda Geggie, Nikki Tate-Straton and Mary Alice Johnson work together to gather information and facts and report back to the Commission in due course. For future meetings, it was agreed to include this item under the "Education and Outreach" section of the Agenda, which Linda chairs.

Isle of the Farmlands Inst.



The Corporation of the District of Central Saanich

February 24, 2014

File No. 0400-50/14

Capital Regional District
PO Box 1000
625 Fisgard Street
Victoria, BC V8W 1R7

Attention: Alastair Bryson, Board Chair

Dear Mayor Bryson:

Re: Regional Services Supporting Agriculture; Input to the Regional Sustainability Strategy and Food Systems Sub-Strategy

At the Regular Council Meeting held on February 17, 2014, the Municipal Council of the District of Central Saanich requested the Capital Regional District to include the following regional services for consideration as a mechanism for the region to support local agriculture, within the draft Regional Sustainability Strategy and Food Systems Sub-Strategy:

1. *Building on the existing regional water service, continue to provide farms with bulk water at reduced rates and support expansion of the water delivery system where it can be demonstrated to support local food production and processing;*
2. *Support, through prioritized regional gas tax funding, agricultural drainage infrastructure projects that demonstrate a benefit for local food production;*
3. *Ensure that regional composting of organic waste protects the agricultural land base, and provide a mechanism for farms to access compost at a bulk rate that is affordable in the quantities necessary to enhance farm soils for food production;*
4. *Create a regional office for agricultural extension and business development to support innovation and growth in local food production, processing and marketing, with a mandate to focus on the following:*
 - a) *Regional food distribution;*
 - b) *Regional processing and storage infrastructure*
 - c) *Support for institutional purchasing of local products*
 - d) *Support for innovation and funding (navigating provincial and federal funding programs); and,*
 - e) *Collection and analysis of data on regional farming.*

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Furthermore, Council suggests the CRD seek funding from the Province to support the creation of this regional office and the Ministry of Agriculture has indicated interest in exploring this model if there is regional support.

In addition, the District reiterates its request for the CRD to support the following (as initially requested in 2011)::

5. *Create a regional farm land trust and farm land acquisition fund to acquire a supply of land for lease to farmers, including incubator farm plots for new farmers;*
6. *Create a farmland-wildlife stewardship programme to pay farmers for providing ecological goods and services, and establish a regional levy to fund the programme; and,*
7. *Guide institutions (universities, school districts, health care facilities, local governments, etc.) within the region to adopt procurement policies to buy locally produced food by investigating legal hurdles and providing examples of approaches that have proven successful.*

Yours truly,

A handwritten signature in dark ink, appearing to read 'Alastair Bryson', followed by a horizontal line.

Alastair Bryson
Mayor

Submission and Presentation to the Committee of the Whole, CRD

Submitted on April 1, to accompany oral presentation to the Committee of the Whole session on April 29

Thank you for the opportunity to present our reflections on the draft Regional Sustainability Strategy. Sierra Club BC appreciates the enormous amount of work invested into this document by CRD Directors and staff, the 13 individual municipalities and the Juan de Fuca Electoral Area, as well as numerous citizens who participated in the consultation process. We find that the document overall reflects the values of CRD residents in terms of a sense of place rooted in an appreciation of our region's spectacular natural beauty and diversity. We welcome the significant priority given to climate change and the fact that climate change is woven throughout the draft RSS.

We would like to submit the following specific comments:

OBJECTIVE 1 – “Significantly reduce community-based greenhouse-gas emissions”

1. We are pleased to see the a spectrum of strategies included in this discussion – from low carbon transportation hubs, generation of renewable energy to retrofits and energy efficiency, and most especially the recognition of the carbon-storage and sequestration potential of forest lands and marine habitats (eelgrass), and the importance of local food production (Policies 1.1 to 1.6). What seems missing here are stronger Actions that would give full effect to the commitment in Policy 1.5 to preserve the carbon-sequestering capacity of JdFEA. For example, an Action might be to “work with other levels of government , private landowners and other stakeholders to reduce or eliminate destructive practices such as slash burning or clear-cuts”. Although land use policies regarding “compact communities” are listed

below, it would be useful to refer to them here, so that it is clear that preventing sprawl is one of the actions that contributes to reducing greenhouse gas emissions.

The importance of strong, unequivocal and vigorously enforced land use policies that preserve forested areas and keep settlements compact cannot be overstated.

2. The RSS Target of 33 per cent by 2020 is aligned with B.C.'s legislated remission reduction target, while 61 per cent by 2038 is somewhat more ambitious than B.C.'s legislated commitment of 80 per cent by 2050.

Given the spectrum of strategies proposed in this section, we think the CRD can do much better than B.C.'s legislated targets. In light of the most recent climate change science and the impacts we are already seeing at less than 1 C of global warming lead to the inevitable conclusion that B.C.'s targets, while a laudable effort back in 2007, have now been shown to be insufficient to mitigate climate change. This is an opportunity for the CRD to lead the way! **We urge the CRD to adopt, at a minimum, the target of 40 per cent reduction by 2030 (from a baseline year of 1990). We would also suggest that the CRD follow Vancouver's new commitment to meet 100 per cent renewable energy.**

3. We would also recommend that the RSS include a climate test as a criterion for changes to OCPs, municipal and JdFEA context statements and major investments by the CRD. This would mean that a climate impact (in terms of greenhouse gas emissions and carbon sequestration capacity) would be a criterion for approving or rejecting any proposed change to an OCP, municipal or JdFEA context statement, or major CRD investment. The 2013 draft of the RSS did articulate such a test: "Energy and emissions considerations are key drivers for decision-making and lead related policy aims, priorities and regulatory measures". This is missing from the current draft, which instead offers vision-based questions *recommended* to be "considered in the context of all future decisions", to wit: "Will this decision/investment move us further towards sustainability? Will it reduce GHG emissions more than other available options?" This is a recommendation only and as such, unable to trigger enforcement. Nor does the commitment to full-cost accounting later in the RSS capture the effect of a strong climate test. We ask the COW to direct staff to include

a climate test provision – fleshed out as to the standards for carbon accounting and associated process issue – in the next draft of the RSS.

OBJECTIVE 2: “Be resilient to climate change impacts and natural hazards”

We especially welcome Policy 2.3 – “Foster a viable regional food and agriculture economy” and the associated Actions, particularly “Initiating a regional farmland trust and farmland acquisition fund” and the inclusion of farmland-protective policies in the OCP for JdFEA. As the RSS states, “Locally grown and locally processed food is good for the economy and events such as farmers markets build community and increase awareness of food choices that support environmental and human health. Second, establishment of a farmland trust and acquisition fund is needed to increase access to farmland for young farmers who cannot afford to buy land. This initiative will address both the aging farming population and help maintain or increase the supply of land available for food production. It will also lay the foundation for long-term prosperity that can sustain farming for generations.” **Given the importance of local food production for all of the Objectives, we urge the CRD to develop a farmland acquisition policy and ambitious Targets that go beyond maintaining the ALR.**

Under Policy 2.2, “Minimizing risk to development areas and the built environment”, the Actions listed would benefit from being more specific. Namely, land use regulations that prevent residential and commercial development in near-shore environments, protection of salt marshes and intertidal zones as a buffer against increased storm surges and sea level rise, and discouraging hard seawalls are all part of a truly prudent climate change adaptation policy.

OBJECTIVE 3: “Manage growth”

1. We welcome the principle of integrating land use planning and transit, evident throughout this section.
2. We observe that the current RSS draft has kept the RGS Target for Compact Communities- 90 per cent cumulative new dwellings in the GCA. **This target is far too low (and has been exceeded by the CRD and member municipalities in some years of the past decade); we suggest a Growth Management Target of 95 per cent or even**

higher. Locating the vast majority of new development in existing serviced areas in compact, walkable complete communities is the most direct way to address GHG reduction and affordable housing concerns. There is a variety of strategies to achieve this target, including reducing or removing existing barriers to co-housing developments, removing restrictions on infill development density, and establishing minimum parking and setback requirements. Developers should be encouraged to build more basic, low-rise (3-6 story) townhouses and apartments along arterials and in urban villages.

3. The **Dwelling Unit Growth Target of 30 per cent** of new growth in walkable, bikeable, transit-serviced communities **is much too low** as it makes almost no improvement over the 2003-14 record of 28 per cent. **It should be at least double or 60 per cent.** More precisely, specific density targets should be set for each sub-region or municipality in recognition of their unique circumstances and character. Locating the vast majority of new development within the GCA in compact, walkable complete communities is the most direct way to address GHG reduction and affordable housing concerns. There is a variety of strategies to achieve this target, including reducing or removing existing barriers to co-housing developments, restrictions on infill development density, minimum parking and setback requirements. Developers should be encouraged to build more basic, low-rise (3-6 story) townhouses and apartments along arterials and in urban villages. Another criterion would be to preclude any “Greenfield” settlement within the GCAs until the density of the existing growth centres exceeds a target.
4. We applaud the transportation mode shift target of 42 per cent and the zero emissions vehicles target of 72 per cent.
5. On comparing the RSS with the RGS we find that the old term RUCSPA (Regional Urban Containment and Servicing Policy Area) has been replaced with GCA (Growth Containment Area). While the reduction in the alphabet soup factor is a refreshing change, we are concerned about deterioration in meaning. **The definition** in the RGS (“The area contained within a regulatory boundary marking the limit between a defined urban growth and servicing area and other areas such as rural and resource areas, where urban growth is discouraged.”) is strong and clear. The wording in the RSS

("identifies lands that will be supported for housing and employment growth. These are the areas where major new regional transportation and liquid waste service investments will be directed...The boundary of the GCA reinforces protection of agricultural lands, natural environments, natural resource lands and rural areas) is vague, unclear and **should be reversed**. Legislation ought not to be shy to say "no" and mean it. "We encourage the consumption of soft drinks before driving" is a very different message from "Driving while intoxicated is prohibited." A vast majority of CRD residents desire a RSS that acts as a strong guardrail against urban sprawl. Vagueness in legislative instruments invites the exploitation of legal loopholes, conflict between the CRD and municipalities, and expensive litigation with developers. A strong and enforceable RSS, including a firm and binding growth boundary, acts to prevent land speculation and real estate bubbles, and contributes to the goal of increasing agricultural lands and agricultural production, as well as affordable housing.

6. Regarding the water servicing question, we support the current RGS stance that limits water servicing to the current growth management boundaries other than in conditions of risk to public health. This policy is an important tool for limiting sprawl into rural areas and should not be relaxed.

OBJECTIVE 4: "Foster individual and community well-being"

We are delighted to see Access to Nature listed among the Basic Needs under Individual and Community Well-being.

Under Housing and Affordability we would like to see explicit support and policy mechanisms that favour co-housing, shared ownership, smaller square footage with, for example, reduced parking requirements in exchange for commitments to cycling, transit and car sharing; and discouraging speculation and absentee ownership/absentee landlords.

We would also like to see the CRD take a more proactive stance with regard to educating and advocating with the provincial government for more local self-determination with regard to aggregate and mineral mining within municipal boundaries. The proposed Ajax mine within Kamloops city limits – less than a mile from residences and an elementary school - ought to be

a warning to us all on what can happen when local governments are unable to regulate mining development in their own communities. Concerted action within UBCM and FCM is imperative to restore local government control of mining activities that impact community members' health, drinking water, and sustainable economic activities that residents depend upon.

OBJECTIVE 5: "Conserve and Enhance Natural Environment"

Objective 1 has already acknowledged the importance of forests for accumulating and sequestering carbon, especially in old-growth and mature forests. The stated intention of Objective 5 the goal is to protect the ability of natural processes, including biodiversity, to sustain themselves on the landscape ("Nature needs Half"). Obviously, forestry practices have a big impact on that goal. Weak logging regulation for public land and the lack of meaningful logging regulation for private land is creating more and more risk of dangerous impacts like erosion, flooding, landslides and droughts in CRD watersheds due to the increase in extreme weather. We realise that that the CRD does not have jurisdiction over forest practices by licensees or private owners, which are a provincial responsibility. However, in the section dealing with requests to provincial and federal agencies by the CRD, we believe there is room for the CRD to show more leadership. We would go even further and say that, as trustees of the well-being of this region and all its inhabitants, human, animal and leaf-bearing, **the CRD has a responsibility to educate and advocate with senior levels of government for policies that support regional sustainability objectives.** We urge the Directors to make an explicit commitment to that effect, through direct discussions with senior governments, and by initiating and supporting collaboration with other municipal governments in these efforts, including concerted action through UBCM and FCM.

Specific comments on policies and targets:

1. We welcome Policy 5.1 and associated Actions to expand the regional protected area system, and adopt OCPs in the JdFEA that identify policies aimed at working with the province and private landowners to protect land identified as sensitive ecological areas, and as areas of interest in the Regional Parks Strategic Plan and to ensure the long-term protection of Capital Green Lands.

2. Regarding Policy 5.2, “Protecting marine and freshwater resources”, we would welcome an explicit recognition that a number of fish-bearing streams have their headwaters in the JdFEA. We suggest adding an Action to increase watershed protection for fish-bearing river systems (which would also contribute to the goal of increasing local food production).
3. Regarding Policy 5.3, “Protecting the Natural Resource Land Base”, Sierra Club BC supports the recommendation by Friends of Juan de Fuca Forests to include more explicit statements about the need to preserve old-growth forests and to allow a significant portion of the Rural Resource Lands forest to grow on to maturity and beyond. Preserving old growth and allowing second growth to become old growth could be one of the most important initiatives undertaken to reduce greenhouse gas emissions within the CRD. At the same time the CRD should engage to reduce the practice of clear-cutting and slash-burning and use its influence to support longer rotations and selective logging. Wood products can be promoted as climate-friendly alternative to steel and concrete, if forest management is strictly guided by the goal to reduce emissions as a result of forestry.
4. We strongly urge the CRD to include Actions and Targets for preserving old growth and identifying areas where new forests can be protected so that they can grow in perpetuity. We believe planning for “sustainable” land use in the CRD must include specific recognition of the challenges and benefits of regional planning for JdFEA.
5. We urge the CRD to develop a farmland acquisition policy and ambitious Targets that go beyond retaining the ALR.

Finally, we would underline the importance of having a clear list of actions to be taken to implement the RSS, with timelines, and of devoting sufficient resources to effectively monitor performance.

Ana Simeon, for Sierra Club BC and Sierra Club Victoria local group



March 31st, 2015

Signe Bagh
Senior Manager – Planning and Protective Services
625 Fisgard Street
Victoria, BC V8W 1R7

SUBJECT: Regional Sustainability Strategy (RSS) input from the Greater Victoria Chamber of Commerce

Dear Signe:

The Greater Victoria Chamber of Commerce has served as the voice of business in the region for over 150 years. Over the years we have witnessed the region's various stages of growth, stagnancy, triumphs and tribulations. The Chamber supports the Capital Regional District (CRD) in its efforts to create a bold vision for the region that takes us into the future. As part of this bold vision however comes the responsibility of sound policy formation practices that support the vision. It is the Chamber's perspective that this is the role of the Regional Sustainability Strategy (RSS).

We congratulate the seemingly strong inclusion of economic development in the draft strategy document. To strengthen the economic position and future of the region, the Chamber urges the CRD to take bold steps to funding economic development at the regional level, while also encouraging policy frameworks at the local municipal level that align to economic growth and urban containment.

The Chamber suggests that in Section 4, Objective 4 "Foster individual and community well-being" that jobs and household incomes could be emphasized here as part of the basic needs of a household. Any sustainable region needs an economic base and a business climate that leads to the continued development of that economic base over time. To us and our members, this would be paramount to regional sustainability and should be strongly reflected in such a strategy.

In Section 4, Policy 4.5 "Advance economic development initiatives", the Chamber has supported economic development in this region for many years and in 2007 created a stakeholder-driven organization to deliver services in this area. The role of the CRD should be to convene the regional government towards a coordinated economic development strategy that aligns to the vision set-forth in the RSS.

In Section 5 "Implementation", the Chamber would like to see a more aggressive implementation plan that aligns to the extensive efforts of designing the RSS framework. The CRD should include a resource deployment plan in order to show how each action will be implemented and within what timeframe. Many of these implementation mechanisms could relate to how the CRD plans to convene the municipal governments in those actions. Getting them to agree to this could be an essential function of the RSS. The Chamber also encourages a more transparent reporting mechanism to show how close the region is to each target. This could serve as a valuable advocacy and community-engagement tool.

In general, the Chamber would urge the CRD to encourage a positive business climate within which our region can be sustained. The Chamber's policy directives provide a meaningful cross-section of policy areas that our members feel would support positive economic growth and vitality. A list of these policy directives is available on our website www.victoriachamber.ca.

Thank-you for the opportunity to comment on the RSS. Please contact the Chamber directly at 250-383-7191 to request further information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Bruce Carter', with a stylized flourish extending to the right.

Bruce Carter
CEO



March 31st, 2015

Signe Bagh
Senior Manager – Planning and Protective Services
625 Fisgard Street
Victoria, BC V8W 1R7

SUBJECT: Regional Sustainability Strategy (RSS) input from the Greater Victoria Development Agency (GVDA)

Dear Signe:

The GVDA has acted as the region's economic development office since 2007. The GVDA has experienced many successes on many levels through the years as we've maintained a steadfast commitment to region-wide services in spite of receiving financial contributions from a few select municipalities in the region. We believe that that economy in the Capital Region behaves regionally and thus we are excited to provide input to the RSS process in the hopes that the RSS can set a bold set of targets for all of us as citizens, businesses, and community leaders.

We will offer feedback in areas that we believe are relevant to economic sustainability as this is the area of our expertise. The first observation is around the slight disconnect between the RSS "Vision" on Page 6 of the document and the targets found within the strategy itself. For example, expressly using words like "direct, innovative action" and then offering targets around "full time employment" that are not direct, innovative, or action-oriented will not lead to direct action because the strategy is not providing any guidance as to what actions are needed to achieve that target.

That stated, we do believe the vision statement accurately reflects what is needed for our region; however, at this point we urge decision-makers to strengthen the RSS so it does in fact align with the above statement. In order for any strategy to have impact for economic sustainability it needs to: 1) compel decision-making through alignment (i.e. the region as a whole needs to believe in the vision and be motivated to achieve it); 2) the strategy must guide decisions by enabling actors to make incremental steps towards achieving the vision (this is the ultimate goal of the RSS; however, the strategy for the economy is not clear enough to support decisions that move the region towards the targets); and 3) it needs a transparent and regular reporting mechanism so that actors can see the progress they have made through their decisions and can clearly determine where the shortfalls exist (if any) so that the course can be effectively altered. The RSS process is lengthy and therefore showing all parties (both decision-makers and constituents alike) the progress that has been made towards the targets will be a major component of motivating real action at both the policy-making and household-levels.

On Page 25 (Section "Regional Challenges and Opportunities) the RSS lists three benefits that the region can take advantage of under the "economy" heading. We believe there are many more benefits that should be included in this section to inspire and motivate actions that could result from the RSS. These

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are related to the region's world-leading ocean science and technology infrastructure, the presence of three large and growing education institutions, the region's position as a clean-technology leader, the region's attractiveness as a destination for international students, the region's proximity to Vancouver, Seattle and the Pacific Northwest/Cascadia region—one of the world's most vibrant mega-regions, the region's attractiveness as a tourism destination and the linkage to in-bound investment that occurs from this global exposure, and many more.

In Section 3 regarding regional Growth Centres, the GVDA supports the approach to fostering regional diversity, urban containment, and the concept of complete communities. The GVDA also supports the necessity to protect industrial land and employment lands that offer unique and specific amenities that are supportive to long-term job creation and enable long-term infrastructure planning that aligns to this.

In Section 4, Policy 2.3 "Foster a viable regional food and agriculture economy", the GVDA supports aggressive actions in this area that encourage farmland productivity through value-added agriculture that links not only to regional food supply, but also into enhanced product development to help ensure that agricultural landowners can support their households through innovative, product-driven revenue streams that link to their agricultural ventures.

In Section 4, Policy 3.1 "Contain growth in compact urban settlements", the GVDA supports the concepts of densification and urban containment. Ideally these concepts exist within a regional transportation system that enables easy linkages between/among dense areas of the region. This aligns with economic trends in major cities throughout the world that show the emerging workforce is less likely to own cars and actually prefer smaller, low-impact housing units. Moving people and goods around the region efficiently is directly linked to the economic productivity of the region.

In Section 4, Objective 4 "Foster individual and community well-being" we feel that household sustaining jobs could be emphasized here as part of the basic needs. It is listed as part of the first bullet point, but not shown in figure 11 as a need. The economy and the income it provides is perhaps fundamental to many of the basic needs that are listed (in fact it is regarded a one of the three fundamental pillars of community development).

In Section 4, Policy 4.1 "Create healthy, vibrant and resilient communities that support the wellbeing of residents", the GVDA strongly urges the CRD to take a more prominent leadership role in the region's vitality instead of moving this to municipalities (see 4.1.13 where local municipalities are requested to come up with guidelines and targets for "vitality". Vitality has more to do with job creation and household incomes, which are regional in nature. It is very difficult for local municipalities to develop policy in this area. What tends to happen as a default is municipalities compete for real estate developments that have little to do with actual wealth creation and vitality and more to do with their own tax revenues).

In Section 4, Policy 4.4 "Leverage public investment and land use to support economic growth" the GVDA expresses strong support for this area but urges the CRD to take a proactive role to aligning the quality of life features to the needs of the region's growth sectors. Linking quality of life to economic development makes sense on paper, but the actual practice involves deeper research and understanding.

In Section 4, Policy 4.5 “Advance economic development initiatives”, the GVDA supports that there is a strong role for the CRD in this area and urges the CRD to add further detail (specifically in sections 4.5.1 and 4.5.2) with regards to how these actions will be taken. In section 4.5.10 the GVDA urges the CRD to include wording around the “regional” role in these activities specifically with regards to the second bullet point. In practice, to do this effectively requires firm understanding of economic development marketing (place branding and targeted attractive initiatives) and site selection best practices in North America.

In Section 5 “Implementation”, the GVDA strongly urges the CRD to add a significant transparent and reporting mechanism to the section around “Monitoring and Review of the Plan” on page 114. Reporting on progress should go way beyond just the CRD board and made transparent to everyone in the community through an online dashboard (or published document). This would enable decision-makers and all citizens the opportunity to tweak their decisions based on progress and see where progress is falling short in real time. Third-party stakeholders could also respond to the progress gaps through targeted program development and advocacy.

For the purpose of fostering a vibrant region full of household sustaining jobs, the targets to achieve this should align to the RSS vision (which uses the words “bold, innovative and action”). To inspire action, the targets for job creation should align to this concept by being bold, innovative and action-oriented. The targets around growing “full time jobs in proportion of population growth” is a nice target to have; however it is not bold nor innovative and is very difficult to link to specific policy actions. The GVDA desires to play a more prominent region-wide role to move towards a vision for the region’s economy that is bold, innovative and action-oriented.

Thank-you for the opportunity to comment on the RSS. Please contact the GVDA by calling me directly at 250-360-3478 or emailing dgislaso@gvda.ca

Sincerely,



Dallas Gislason
Economic Development Officer
Greater Victoria Development Agency

Submission on the Regional Sustainability Strategy.

We commend the Capital Regional District (CRD) for its effort to update the Regional Growth Strategy (RGS) and provide for public input, but there remain significant gaps in the Strategy.

As you are aware, Amalgamation Yes believes that “13 is too many” and that in matters affecting regional concerns the current model of governance is flawed, unaccountable and paradoxical. Your very presence around the table is evidence of that paradox. You are here primarily to adjudicate our collective regional interests but in fact you were elected to represent the interests of your local municipalities. It is understandable, therefore, if you argue and vote for what is best for your own local municipality rather than what may be the optimal solution for the entire region. That holds true whether we are dealing with sewerage, housing, transit, policing, disaster response or regional planning. In short, you are making collective decisions without being accountable to the population of the Capital Region you are serving. By contrast, residents of Victoria may not have been happy with cost overruns for the Blue Bridge, but at least they knew who to hold accountable at election time.

The preparation and implementation of a regional plan for the CRD is compromised because it must reflect multiple and competing municipal interests. Moreover, as members of the CRD board you have limited authority to require compliance with plan objectives. The plan is flawed because it aims to please all municipal jurisdictions and offend none. It is often vaguely worded and lacking in substance with few explicitly stated objectives or defined actions.

The proposed Regional Sustainability Strategy (RSS) identifies several laudable initiatives with regard to climate change, carbon emissions, water quality, wellbeing, waste, agriculture etc., all of which we support. The simple flow chart in Figure 1 shows the previous RGS morphing into the Regional Sustainability Strategy (RSS). While the elements of Growth, Environment and Housing receive adequate coverage, Transportation gets short shrift. Transportation needs to be looked at in light of the draft Regional Transportation Plan (2014) and the Province’s recent announcement of major funding available for transportation projects on Vancouver Island.

The RSS is rife with numerous trendy, feel-good objectives giving particular emphasis to climate change, air quality and the environment all of which are laudable. The well-intentioned attempt to implement the Keystone Initiative for sustainable transportation has a Pollyannaish feel to it, with its emphasis on transit, walking and cycling. However, even it ignores the current rail route as a possible alternative transportation system. Worse, it ignores ‘the elephant in the room’, vehicular road traffic. Your own draft Transportation Plan (2014) shows the present and future dominance of travel by automobile but the RSS omits any real comment on how to deal with it. Presently over 60% of all travel in the Capital Region is by private automobile. Traffic on Highways 1, 1A and 17 are currently rated at ‘congestion levels’. Yet your plan predicts an increase of 115,000 more trips of which 70% will be by automobile! Nowhere does your RSS reflect any sense of urgency on how to deal with this growth which won’t be resolved solely by

the important but insufficient objective of constructing the long-awaited interchange at McKenzie Avenue and Highway 1. The delay in approving the draft Regional Transportation Plan confirms avoidance of this very difficult challenge of meeting the transportation needs of the region, given our current multiple municipal decision making structure. Nor will the July 2014 Service Feasibility Study, focusing on a proposed CRD takeover of the transit function, make the traffic issue go away.

The concept of growth centres as a way of ensuring effective land use is a wonderful idea for protecting the natural environment, agriculture, parklands and other open spaces. But it is naive to think they will become self-contained islands of urban living with little need for travel between them other than by transit. Over 60% of all travel in the CRD area is inter-municipality, much of it by car. The RSS fails to acknowledge that universities, colleges, hospitals, airports, ferries, shopping centres and tourism generate as much or even more traffic than people journeying to work.

The RSS is vague on deliverables and their capacity to achieve them. Consider the following examples.

The plan has elaborate formulas to allocate residential density and urban growth but ignores mobility and the need to provide linkages between where those new folks will soon live in Royal Bay and Westhills and where they work, shop, recreate and seek entertainment. All the major destinations for workers or students are elsewhere and require crossing at least two or three municipal boundaries. We have only one route going north to the ferry, airport and various job sites. The daily congestion on the Helmcken/Wilkinson corridor is evidence of the lack of transportation alternatives between the West Shore municipalities and work sites in northern Saanich, Central Saanich, Sidney and North Saanich.

Several recent major capital projects are undersized or poorly designed. The Blue Bridge, funded solely by the taxpayers of Victoria, has only two lanes and no rail service. The new Craigflower Bridge also has only two lanes to service the dockyard with its growing workforce, the housing infill in View Royal and a connection to the still mythical McKenzie overpass. View Royal and Saanich shared the cost of this bridge (which had to be ‘opened’ twice because the two mayors were unable to be present together at a single ceremony!). Esquimalt, however, has contributed nothing at all even though it is the home of the dockyard, and therefore has much to gain from the improved access the two new bridges provide. Had these infrastructures been built by a regional authority, not only would the burden of financing them have been spread more equitably, but also they could have been designed on a scale that would meet the demands of future traffic flows, cyclists and, in the case of the Blue Bridge, rail.

Overpass designs are sometimes inadequate and dysfunctional, as exemplified by the confusing muddle at the airport turnoff or the elevated traffic jam on the Langford overpass where long lines of traffic in the left turn lane block access to the highway. We would hope that the

proposed McKenzie/Trans- Canada interchange would have more thought put into its design with full consideration of regional traffic flows taken into account.

The Official Community Plan for Saanich makes no mention of the fact that their municipal roads are not just for residents but serve more importantly as transportation corridors for the majority of residents of seven other municipalities who must transit through Saanich enroute to work, shopping, school, airport or ferry. These same roads serve as important routes for the delivery of goods. Does their plan comply with regional goals? For example, East Saanich has six key arterial roads all feeding into the single Highway 17, while the entire western community has just one access route to this highway through West Saanich. In contrast Langford and Colwood have established major new regional connectors with the Veterans Parkway and now with Leigh Rd, and the City of Victoria is taking the initiative to improve Douglas Street as regional corridor. The priority for Saanich, however, is a review of tree preservation on Shelbourne Street, which while a busy internal route is one with only minimal regional traffic flows.

The existing Helmcken overpass is a road link from a major hospital and a new shopping complex to nowhere, but the interminable traffic backups continue where a series of former rural roads, Interurban, Carey, Hastings and Wilkinson are upgraded by Saanich only as two-lane local collector roads rather than as regional arterials. Both regional and municipal planners seem to have overlooked the fact that Camosun College and Discovery Park are growth centres along with the major employment hubs further north at Keating Cross Road, the airport, and regional truck traffic to Hartland will only grow. Map 6 in your RSS appears to perpetuate the need for all traffic from the west to be forced into the urban core before it can begin to travel north to jobs, ferries or airport.

A review of your draft Regional Transportation Plan (pages 13 – 18) suggests that the RSS endorses Principles 3, 5 and 6 but ignores the paramountcy of Principle 1, “Take a coordinated and engaged approach to planning, Principle 4, Integrate transportation and land use planning”, and particularly fails Principle 2, “Prioritize strategic investments that serve regional mobility needs as the means to achieve most other objectives”. Any new overpass without upgrades of access roads is a strange oversight! These are essential inclusions as preconditions to be ready for negotiations with the Province.

Part 4 of the Objectives of the RSS should be amended to include an acknowledgment of the numerous “priority actions” listed on page 24 of the draft Regional Transportation Plan.

Finally while the objective of achieving efficiency in infrastructure expenditures in Objective 6 in the RSS is laudable, it falls far short of its stated objective. It fails to recognize that under the present system of governance, individual municipalities incur vast expenditures of their own capital funds to meet their own local needs and end up with administrative and recreational facilities, police and fire halls, bridges, etc. that are usually undersized and ineffective for

regional purposes and often duplicate similar facilities nearby. Consider the three separate municipalities on the Peninsula where currently two city halls and a major new fire hall are being planned in isolation rather than jointly; or the major new CRD office on the outskirts of Sooke to serve a relatively small number of rural residents. Surely we can more effective with such investments. We need more co-operation and a better agreement on needs.

While the RSS may be the best that can be achieved given the current governance environment, it falls so short of what is needed without legislative reform and municipal restructuring.

March 31st, 2015

Amalgamation Yes

Contact Tony Heemskirk 250 595 5177 or James Anderson 250 477 8255



March 31st, 2015

Capital Regional District Board
Capital Regional District
625 Fisgard St. PO Box 1000
Victoria, B.C. V8W 2S6

Re: Draft Regional Sustainability Strategy (RSS) Improvements

The West Shore Developers Association (WSDA) has serious reservations about the RSS process underway at the CRD, including the current state of the draft RSS document and the proposed timeline of CRD staff to put the RSS on the agenda for Public Hearing in August 2015.

With regard to content of the RSS, the WSDA RSS Review Committee has made a deliberate decision to focus specifically on a limited number of key matters with a potentially direct impact to real estate development in the West Shore. Given that CRD Staff has informed the WSDA that this submission will not be incorporated into the Staff Report, and will rather be merely appended to it for the CRD Board review, this letter is addressed directly to the Board.

1. The RSS should first and foremost be a comprehensive growth management and land use document, that integrates overall sustainability objectives for the Region. Instead, the draft RSS is focused on Greenhouse Gas (GHG) reduction objectives to such an extent that other regionally critical land planning initiatives have been underrepresented and, in some cases, overlooked entirely. It is also worth pointing out that every member municipality of the CRD already has locally endorsed targets, policies and actions for the reduction of GHG emissions included in their own OCPs (and in some cases as standalone, comprehensive documents), consistent with Bill 27 (2008). GHG reduction objectives are worthy of a strong focus, and past CRD Board direction has evidently steered the draft RSS document down this path, however it should not be at the expense of key regional priorities. Two major examples are:
 - a. Traffic Congestion: The RSS focuses on GHG reduction, forecasts relatively massive population growth in the West Shore, and claims as its #2 "Keystone Initiative" a "more sustainable transportation system." However the East-West traffic congestion is not addressed at all, other than to dismiss rapid transit in a single bullet point on page 24 as being "challenging" as a solution. Given existing land use and zoning approvals, and RSS growth forecasts, this represents a complete lack of leadership and planning on one of the most significant and growing challenges this region will face moving forward. Increasing congestion will severely impact quality of life, health and wellness,

and GHG generation. The RSS is precisely the place that high level policy guidance for improved East-West public transit should be established. Its omission from the RSS is glaring. If the RSS was serious about its stated Vision to achieve “transformational change by boldly: shifting to affordable low carbon, energy efficient lifestyles”, and its Objective One to “Significantly reduce community-based GHG’s” it seems this might be a good place to focus.

- b. Sewage Treatment: How it is designed, constructed, operated, and planned around, will be a defining priority in the Capital Region over the intended lifespan of this RSS, and yet it is not even mentioned in the document. This will have wide reaching implications to planning and growth in the region, not to mention a massive influence on GHG emissions depending on the design, construction methodology and future operation of the system. The RSS should have some mechanism that relates to the sewage treatment program at the very least. Opportunities and obligations that are likely to arise from sewage treatment infrastructure could have significant impacts to local municipal land planning and zoning. Total silence on these issues within the RSS seems inappropriate.
2. Maps 3 and 5 are overly specific and intrude into the jurisdiction of elected Council’s Local Government land use authority. It is not appropriate for the CRD to micro-manage local government land use authority through the use of detailed land use planning maps. Detailed maps such as these set up conflict with local municipalities, including potentially requiring local municipalities to apply to amend the RSS for relatively minor OCP and zoning amendments. Further to this, the maps in the draft document are not accurate as currently drafted, and miss several large areas of zoned General Employment land in Langford, and the Royal Bay development site in Colwood in its entirety. These omissions illustrate one of the issues with such maps. Even modern OCP and LAP documents generally employ bubble plans to avoid issues of precision and accuracy. Municipalities should not support such detailed mapping being incorporated into the RSS as it sets up guaranteed future conflicts and amendments which will necessitate future updates to the RSS as local municipal OCPs and zoning bylaws change with time.
3. The RSS draft currently lists a net loss of 2 hectares of land from the ALR as a Type 1 amendment requiring 50% + vote of the CRD Board and unanimous support of all municipalities. The ALR is currently regulated by the Agricultural Land Commission (ALC), and local government zoning bylaws. The removal of farmland from the ALR is one of the most rigorous, multi-level approval processes for land in the Province of BC. Existing legislation and regulations governing exclusion of land from ALR are such that, only a case such as a widely popular public amenity could conceivably pass the gauntlet of the local government endorsement and zoning process, and meet the high standards required for subsequent approval by the ALC. A further layer of approvals requiring unanimous endorsement from 13 local municipalities would be very difficult to achieve. Consider a scenario where a local government sponsored a plan for a community recreational facility, combined with an increased

intensity of farm use on adjacent lands, resulting in both an amenity and a net increase of agricultural production, but a net loss of land. Suppose this plan enjoyed high levels of public support within not only the local municipality, but also those of neighbouring municipalities, whose residents would enjoy the use of such a facility. The local municipality could foreseeably secure the approval of the ALC for such a plan, if the plan had merit, but this plan could be vetoed by one single municipal Council responding to their own local politics, and not the greater public good for the Region. It is clear that this proposed new layer of regulation is unnecessary and problematic and should be removed from a future revised RSS draft.

4. Many of the policy statements commencing on page 69 of the draft RSS state that “local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:” and then proceed to list numerous specific actions. The statement “local municipalities agree to...” uses very strong language that appears to obligate local governments to adopt municipal Regional Context Statement bylaws consistent with the various statements. It seems unlikely that all local municipal Councils will be willing to agree to the RSS as written with such specific and strongly worded policy statements. Attached to this letter are numerous examples of statements of concern to the WSDA that are likely to be viewed in a similar way by many local municipal Councils. If policy statements must first state that “local municipalities agree to...”, they should be followed by less binding terminology - words like “encourage” or “consider” ought to replace words such as “establish” or “restrict”, and adding prefaces such as “where possible” would soften this kind of binding language, allowing municipalities to confirm their support for regionally significant priorities while safeguarding their local decision-making autonomy. Alternatively the policy statements could avoid entirely statements such as “local municipalities agree to...”

This WSDA urges the CRD Board to send this draft RSS back to CRD staff to address these issues before they consider moving this RSS forward to Public Hearing stage. The document as written deserves improvement prior to Public Hearing, and it should be slowed down a little so that expanded consultation, with a wider range of stakeholders can be achieved.

Sincerely,



Ben Mycroft

For the Regional Sustainability Strategy Review Committee
West Shore Developers Association

Cc: Signe Bagh, Manager, Regional & Strategic Planning, CRD
Matthew Baldwin, Director of Planning, City of Langford

CRD RSS Draft – Policy Actions for Local Municipalities (pages 59-104)

Objective 1: Significantly reduce community-based greenhouse gas emissions

Policy 1.1 - Develop Growth Centres and General Employment Lands as 'low carbon hubs' Actions

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

1.1.5 Establish land use mixes and density thresholds that support a greater share of trips to Growth Centres and General Employment Lands to be made by walking, cycling, and transit, and low/zero emissions and multi-occupancy vehicles.

Local municipalities, utilities, provincial and federal agencies are requested to:

1.1.6 Support and encourage the provision of renewable energy facilities and clean district energy systems, especially within Growth Centres and General Employment Lands.

1.1.7 Advance provision of clean district energy systems and facilities to support the use of low/zero emissions vehicles in Growth Centres and on General Employment.

1.1.8 Invest in transportation infrastructure and facilities that support the following travel choices to and within Growth Centres and General Employment Lands:

- Walking
- Cycling
- Transit
- Low/zero-emissions vehicles

1.1.9 Consider participation in public/private partnerships to establish clean district energy systems for new development and retrofit projects.

Policy 1.2 - Increase generation of renewable energy

Local municipalities, provincial and federal agencies and public utilities are requested to:

1.2.8 Support the use of renewable energy generation technologies and clean district energy systems.

- 1.2.9 Consider the development of programs to support the use of alternative renewable energy generation technologies and clean district energy systems.
- 1.2.10 Consider partnering with the CRD on renewable energy public education and outreach programs to reduce GHG emissions.
- 1.2.11 Consider partnerships with the CRD and affected municipalities regarding proposed renewable energy generation projects in the region.
- 1.2.12 Consider partnerships with the CRD and/or private utility providers to establish a clean energy district regional utility.

Policy 1.3 - Increase energy efficiency and recovery from retrofits and new development

Local municipalities are requested to:

- 1.3.8 Support the use of green building standards in the design and construction of new buildings and for energy retrofits for existing buildings as permitted by the BC Building Code.
- 1.3.9 Support for the use of green infrastructure in public projects that reduce energy use, water consumption, and minimize waste.
- 1.3.10 Promote eco-industrial development in appropriate locations.
- 1.3.11 Participate in CRD and/or higher level government initiatives to promote awareness and develop tools to educate building code officials, local governments and the industry about how to meet energy code standards.

Policy 1.4 - Design, manage, fund and operate the region's transportation system, infrastructure, utilities and facilities to reduce GHG emissions

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

- 1.4.5 Contribute to reduced community-based GHG emissions through measures such as the design and implementation of municipal transportation systems, travel demand management strategies, transit priority measures, ride-sharing and car-sharing programs.
- 1.4.6 Enhance and manage municipal infrastructure to support walking, cycling, transit, and multiple-occupancy vehicles.

Local municipalities are requested to:

- 1.4.7 Encouraged to identify full costs and benefits associated with public sector projects.

1.4.8 Develop strategies and action plans to achieve net zero GHG emissions from corporate fleet and transportation, buildings and general operations.

Policy 1.5 - Protect the carbon sequestration value of natural resource lands and the regional tree canopy

NO ACTIONS REQUESTED OF LOCAL MUNICIPALITIES

Policy 1.6 - Build healthy and resilient food and agriculture systems

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

1.6.5 Support local food production and address potential land use conflicts.

Local municipalities, provincial and federal agencies are requested to:

1.6.6 Participate in the development of strategies and action plans to increase local food production.

1.6.7 Participate in development of waste management strategies that provide farmers and food growers with access to the region's organic waste materials.

Policy 1.7 - Measure and report on corporate and community- based GHG emissions and energy use in the region

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

1.7.5 Reduce GHG emissions and energy use.

Local municipalities and utilities are requested to:

1.7.6 Maintain their commitments to the Climate Action Charter.

1.7.7 Benchmark and report on energy use in municipal/utility buildings.

Objective 2: Be resilient to climate change impacts and natural hazards

Policy 2.1 - Design, manage and construct climate change- adaptive and risk-adaptive infrastructure and utilities

Local municipalities, provincial and federal agencies are requested to:

2.1.2 Develop strategies to increase resiliency and minimize climate change impacts and natural hazard risks to infrastructure.

Policy 2.2 - Minimize risk to development areas and the built environment from climate change and natural hazards

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

2.2.5 Support mitigation of risks associated with climate change and natural hazards in existing and future development areas, *within the scope of local government authority*. **(Consider using this caveat throughout the entire RSS document)**

Local municipalities and provincial and federal agencies are requested to:

2.2.6 **Consult and cooperate with First Responders and other higher levels of government** in the development of:

- Regionally integrated preparedness, mitigation, response and recovery plans to aid in land use and infrastructure decision-making.
- A Regional hazard, risk and vulnerability assessment to provide a baseline understanding of risk in our region.
- Regional and local Hazards, Risks and Vulnerability Assessments for infrastructure, utilities, facilities and development areas.
- Updated response and complete regional and local recovery plans for infrastructure in preparation for major emergencies and disasters.
- Integrated emergency planning for emergencies and natural disasters through sharing of data and coordinated public messaging.
- A decision-making framework for regional resource allocation after a major emergency or natural disaster.

2.2.7 Mitigate hazards, risks, and vulnerability of existing and new developments to climate change and natural hazards risks, where practical.

Policy 2.3 - Foster a viable regional food and agriculture economy

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

2.3.7 Support a net-zero loss of ALR and non-ALR farm lands and discourage fragmentation of farmlands. Consider removing this entirely or relocating to the next category ("Local municipalities ... are **requested/encouraged to**") and use alternative wording, such as "Where requests for ALR exclusion are submitted with respect to lands that may not be used for viable agricultural purposes, an overall benefit to the community should be demonstrated." This concern is further detailed in our cover letter.

2.3.8 Support innovation in the local food and agriculture systems, including support for local farm business expansion and diversification, and urban agriculture. Consider removing this entirely or relocating to next category ("Local municipalities ... are **requested/encouraged to**"). Expansion of agri-business may not be appropriate or desirable in every municipality and support for a specific industry should be determined at the local level.

Local municipalities and provincial and federal agencies are requested to:

2.3.9 Consider participation in the creation of a regional farmland trust and farmland acquisition fund.

2.3.10 Increase funding and program support for the local food and agriculture system.

2.3.11 Support innovation in the local food and agriculture system, including support for expansion and diversification of local farm businesses, and urban agriculture. **Duplicate of 2.3.8?**

Objective 3: Manage growth

Policy 3.1 - Contain growth in compact urban settlements

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

3.1.9 Locate a GCA consistent with Map 3: Growth Containment Area. Map is too prescriptive and does not align with local OCPs as shown. Must allow local municipalities to change OCP without changing RSS mapping. Large developments and Industrial areas not shown (example, Royal Bay is ignored). Provisions for municipal flexibility in the RSS draft do not sufficiently address major concerns related to prescriptive mapping. Key zones on these maps should be shown symbolically (bubbles/circles/dots). Prescriptive mapping at this level overlooks locally important nodes and will always be a moving target. This concern is further detailed in our cover letter.

3.1.10 Provide for Growth Centres, consistent with Table 2: Growth Centres Functions and Characteristics with locations and boundaries consistent with the conceptual locations on Map 5: Growth Centres, General Employment and Industrial Land. **See comments RE 3.1.9 and cover letter.**

3.1.11 Establish strategies for containing growth to land within the GCA, and where relevant, limit growth and development in Rural Lands and Natural Resources Lands Policy Areas to not exceed subdivision and development limits set out in the OCP at the time of adoption of the RSS. **Unless development outside the GCA is supported by the creation of additional local employment (example: mill sites, eco-tourism).**

3.1.12 Restrict extensions of municipal liquid waste systems outside a GCA, unless there is a pressing public health, public safety or environmental issue affecting existing development.

3.1.13 **Where appropriate**, locate major new trip-generating commercial, institutional and recreational facility uses inside a Growth Centre or General Employment Lands within the Growth Containment Area. **This also exposes problems with prescriptive mapping.**

Local municipalities, provincial and federal agencies are requested to:

3.1.14 Invest in transportation and servicing infrastructure to support compact urban settlement.

3.1.15 Locate major publicly-funded, public-serving trip-generating uses inside a Growth Centre or on General Employment Lands.

Policy 3.2 - Protect the integrity of rural lands

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

3.2.3 Establish no or low growth settlement patterns and densities consistent with the purposes of the Natural Resource and Rural Land Use Policy Areas.

3.2.4 Limit residential and commercial development in the Rural Lands Policy Area to a scale, form, and density consistent with the character of rural areas.

3.2.5 Support a range of economic activity, including agricultural activities, at a scale consistent with rural character and in appropriate locations in the Rural Land Use Policy Area.

3.2.6 Address the interface between urban and rural land uses to reduce potential conflicts.

3.2.7 Support the role Rural Centres (Table 2: Growth Centre Functions and Characteristics) have in providing local goods and services that enhance the vitality of rural communities.

Policy 3.3 - Integrate land use and transportation planning

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

The CRD needs to identify solutions the east/west and west/north (Westshore to Peninsula) traffic patterns, including rapid transit, network upgrades and improved transit, etc. This major regional priority does not receive adequate attention in the draft RSS.

3.3.5 Develop Growth Centres and General Employment Lands as transit-oriented and pedestrian and cycling-friendly places.

3.3.6 Develop and implement municipal transportation systems that integrate with the RMN. RMN mapping should add Westhills and Royal Bay as nodes, particularly for the new high schools due to open in 2015.

Local municipalities, provincial and federal agencies are requested to:

3.3.7 Invest in infrastructure, facilities and programs to achieve provincial and municipal targets for transit, cycling and pedestrian mode shares.

Objective 4: Foster individual and community wellbeing

Policy 4.1 - Create healthy, vibrant and resilient communities that support the wellbeing of residents

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

4.1.10 Concentrate a range of housing choices, jobs, services and amenities within walkable, pedestrian-friendly mixed-use Growth Centres.

4.1.11 Support creation of safe, accessible, socially inclusive, diverse, liveable and fair communities.

4.1.12 Work towards creating an attractive, accessible and safe public realm of streets, parks and open spaces that foster social interaction and civic life, with a focus on communities most in need.

Local municipalities are requested to:

4.1.13 Establish development guidelines and targets for healthy, vibrant and resilient communities.

4.1.14 Encouraged to preserve and identify heritage buildings and cultural landscapes.

4.1.15 Distribute municipal facilities, resources and services equitably with particular consideration for those experiencing varying degrees of disadvantage.

4.1.16 Give priority to locating new community-focused municipal facilities in Growth Centres. **Either remove this entirely or ensure mapping is not overly prescriptive. Example: recreation at Bear Mtn is not in a "Growth Centre"**

Policy 4.2 - Ensure an adequate and diverse supply of affordable housing

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

4.2.4 Support an increased supply of affordable rental housing for households with low or low to moderate incomes, particularly in areas well served by transit and active transportation modes.

Policy 4.3 - Increase awareness of the human health and environmental benefits of local food choices

Local municipalities, provincial and federal agencies are requested to:

4.3.2 Participate in the preparation of strategies and action plans that increase awareness of food choices that support sustainability and human health.

Policy 4.4 - Leverage public investment and land use to support economic growth

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

4.4.6 Locate General Employment and Industrial Lands consistent with those in **Map 5: Growth Centres, General Employment and Industrial Land. Problematic as previously noted.**

4.4.7 Protect Industrial Lands identified on **Map 5: Growth Centres, General Employment and Industrial Land for long-term industrial use and development. Problematic as previously noted.**

Policy 4.5 - Advance economic development initiatives

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

4.5.7 Support opportunities for green industries, incubator businesses and creative and social enterprises.

4.5.8 Provide for inter- and intraregional goods movement on the RMN that connects to the ferry terminals, harbours, and airport.

Local municipalities and the province are requested to:

4.5.9 Participate in a collaborative process with the CRD, municipalities, economic development agencies and industry groups to develop and maintain a regional demand and supply inventory of industrial and commercial lands and space. **Unclear as to the purpose behind regional government involvement in an issue which seems market-driven?**

4.5.10 Participate in the preparation of an economic development policy that:

- focuses on local government's roles and responsibilities for economic development including provision of high quality public infrastructure, amenities and public services; provision of information and analysis; collaboration with other levels of government; effective development and business regulatory frameworks
- builds on existing economic activity to attract technology and green businesses, promote creative and social enterprise, support incubator and social enterprise businesses, value a healthy natural environment and that prepares for climate change.

Objective 5: Conserve and enhance our natural environment

Policy 5.1 - Protect, maintain and enhance a sufficient quantity and quality of the natural environment to sustain our growing region

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

5.1.11 Locate Capital Green Lands consistently with Map 7: Capital Green Lands and Blue Spaces Core Area.

Local municipalities are requested to:

5.1.12 Participate in a collaborative process to implement the Green/Blue Spaces Strategy for marine areas identified as Blue Space Core Area Policy Area on Map 7: Capital Green Lands and Blue Spaces Core Area.

5.1.13 Manage municipal stormwater and liquid and solid waste to outperform provincial compliance standards and significantly reduce the release of contaminants into the environment through continuous improvement. **Why do we need to outperform Provincial regulations when they are the approving authority in these matters? Will cost more \$\$\$ (including tax \$) to do so.**

Policy 5.2 - Protect the quality and quantity of marine and fresh water resources

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

5.2.5 Mitigate the impacts of land use and development on fresh and marine water quality and quantity, including watersheds and groundwater resources.

Local municipalities are requested to:

5.2.6 Participate in a mapping and evaluation process to identify and address potential impacts of land use and development on fresh and marine water resources, including watersheds and groundwater resources.

Policy 5.3 - Protect the natural resource land base

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

5.3.5 Support the long-term protection of Natural Resource Lands as shown on Map 8: Natural Resource Lands.

5.3.6 Reinforce retention or no-net loss of lands within the ALR. ALR removal applications should be considered where soil capability mapping identifies poor agricultural conditions. Further details included with comments under section 2.3 and in cover letter.

5.3.7 Address the interface of farming, forestry and silviculture with adjacent urban areas.

Local municipalities are requested to:

5.3.8 Adopt soil deposit bylaws that protect soil quality, with particular consideration for farm and food lands. This is already a prescribed municipal authority in the Community Charter and Environmental Management Act and does not require further oversight by CRD via the RGS/RSS process.

Objective 6: Provide cost-effective infrastructure and services

Policy 6.1 - Provide public infrastructure, facilities and services that are cost-effective

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

6.1.5 Concentrate growth to optimize the use of transportation and servicing infrastructure, and public facilities.

Local municipalities, utilities, provincial and federal agencies are requested to:

6.1.6 Promote energy efficient building and infrastructure design, as permitted by the BC Building Code

6.1.7 Participate in a collaborative process, with the CRD, to develop strategies to improve communication, public awareness and data collection for energy efficiency, incentives, and benchmarking for buildings.

Policy 6.2 - Plan and manage infrastructure and utilities effectively

Local municipalities agree to identify the relationship between their OCP and the following actions in their RCS:

6.2.6 Provide municipal infrastructure to support focused growth and economic vitality.

6.2.7 Provide municipal infrastructure to ensure an adequate quantity of water for planned growth and for public safety purposes (e.g., fire suppression) in light of climate change impacts on water demand and supply.

Policy 6.3 - Explore an expanded transportation service authority

NO ACTIONS REQUESTED OF LOCAL MUNICIPALITIES

Public input on the RSS Draft (Oct 2014-Revised)

Sent by email during the public engagement campaign, Mar 10 to Apr 1, 2015

Sent: Friday, March 20, 2015 9:40 AM

To: Regional Planning

Subject: Contact Us - Submission

The following message was received through the form at '<https://www.crd.bc.ca/contact-us?r=regional-planning>'. Neither the name nor the e-mail address can be confirmed as accurate.

.....

Your Name:

[REDACTED]

Your Email Address:

[REDACTED]

Message:

With climate change in general, the drop in oil prices, and the drought in California, there will be a rise in the cost of food. Victoria has a good food growing climate all year round. How can we encourage growing more food on boulevards, sky roofs, and public gardens. I see a good example on Haultain St, where the food is offered to neighbours. We need to support young farmers and preserve good food growing land on the Island and in the city in totally new ways especially for young people.

[REDACTED]

Subject:

CRD EXECUTIVE OFFICE
Received

MAR 11 2015

☒ Chair
☒ CAO *K*
☒ GM *PPS*
☒ Board
☒ Communications
☐ For action / resp. by _____
☐ Corresp. for Board / Committee meeting
☒ For Information Only
☒ Copies to *S. Bach*

☐ For action / resp. by _____
☐ Corresp. for Board / Committee meeting
☒ For Information Only
☒ Copies to S. Bach

6580-20 RJS

Thank you for your hard work on the RSS, it is an important step in the right direction.

Submitted at:3/10/2015 7:05:31 PM

Submitted via: <https://www.crd.bc.ca/contact-us?r=crd-board>

User Agent: Mozilla/5.0 (Macintosh; Intel Mac OS X 10_5_8) AppleWebKit/534.50.2 (KHTML, like Gecko)

Version/5.0.6 Safari/533.22.3