
Subject: FW: 3L proposed development

From: Jessica H

Sent: October 1, 2018 12:01 PM

To: bjolliffe@comoxvalleyrd.ca; egrieve@comoxvalleyrd.ca; bwells@courtenay.ca; eeriksson@courtenay.ca; ljangula@courtenay.ca; rnichol@comoxvalleyrd.ca; cscoville@comoxvalleyrd.ca; councillor.sproule@cumberland.ca; kgrant@comox.ca; bprice@comox.ca

Cc: Alana Mullaly <amullaly@comoxvalleyrd.ca>

Subject: 3L proposed development

Dear CVRD Committee of the Whole,

I currently operate a small farm, and my background is in fisheries and sustainable community development. I live in Merville, but I also consider the City of Courtenay my home-community -- It is where I grew up, where I went to school, and where I currently do most of my day-to-day activities. The region is vital to me, and how it develops greatly impacts me and my family.

I fully support infill and densification in the current core settlement areas as defined in the provincially mandated Regional Growth Strategy. The RGS was an involved and in-depth process that took two years to complete and many, many public and staff hours. Even though the RGS was created in 2010, it takes into account the projected population growth of the region, and it clearly articulates the need for regional hubs to mitigate against the negative impacts of urban and rural sprawl,

"The population may increase by almost 50% over the next 20 years as approximately 25,000 more people and 10,000 more housing units are added to the valley. While the existing settlement pattern is still relatively compact and the overall housing stock diverse, the more recent trend is towards a more dispersed settlement pattern made up of mostly low-density housing forms. Continuation of this trend would result in significant urban and rural sprawl, creating stress on the valley's natural areas and ecological functions, increasing reliance on automobile travel and impacting the character and livability of the region's rural and urban communities. Development must be directed in a manner that creates a sustainable long-term development pattern that uses both land and infrastructure in the most efficient manner." (RGS, 2010)

Complete communities, as described in Objective 1-A (policies 1A-1 through to 1A-7), are developed with densities sufficient to support frequent local and regional transit, and supports healthier transportation choices, and allows environmentally sensitive and working landscapes to be better protected. Infill and densification, as proposed in the current RGS, will enable our transit system to be more cost effective, more efficient for riders and will thereby reduce the number of vehicles on the roads. We need infill and densification within our walkable hubs thus supporting local businesses and allowing our transit system to be more cost-effective.

By sticking with the current RGS as planned, the region will:

- Encourage and support businesses downtown
- Reduce greenhouse gas emissions by supporting walkable communities
- Increase community cohesion, and support vulnerable seniors
- Decrease maintenance (repair and snow removal) costs of streets

The proposed Riverwood subdivision does not fit within the policies outlined by the current RGS, and in fact, it works against the expressed wishes of the community, as articulated in the Regional Growth Strategy (RGS). As such, I am concerned about the impacts that such a development would have on the surrounding resource lands and agricultural areas. As proposed, the Riverwood subdivision will:

- Add to traffic congestion in the region
- Decrease efficiency and affordability of our transit system
- Increase cost to tax payers
- Negatively impact sensitive wetlands, aquatic habitat and fish stocks
- Extract water from the river, which is needed by aquatic populations
- Put 1000s of people in harms way during a fire event
- Adversely impact the rural character of the region

In conclusion, I oppose the amendment of the RGS to allow for the Riverwood subdivision to be included as a settlement node. Instead, I support directing development to the already-serviced municipal centers enabling the rural areas to remain rural. Rural areas are vital to our region and should not be rezoned based on the needs of developers but based on the wishes of the community as defined in the RGS.

Best Regards,

Jessica Hawkins
6547 Poulton Road
Merville, BC

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NOTES:

Current zoning — In the September 13th, 2018 letter addressed to Alana Mullaly, Mark Holland writes, "What was not very clear in the presentation by staff was that the rural areas are intended for rural and resource uses - and this means typically clearing, resource extraction and similar uses. There appears to be a misunderstanding in the community that there is an option not to have it developed but have it stay the way it is." Contrary to what Mr. Holland states, I am aware, and I fully support the current zoning as I believe rural areas need to stay rural. As a rural community, we fully understand that rural areas are not 'bucolic' — a lot of life and living and working takes place in rural areas and, for this reason, rural areas must be protected — Once an area is developed into a subdivision, it will not be changed back. Rural lands provide livelihoods for people, valuable corridors for birds, amphibians and other wildlife; and maximum pervious surfaces to allow precipitation to filter into the soil and recharge the water-table instead of paved surfaces which magnify flash flooding.

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Increased traffic congestion — The proposed ‘automobile-dependent’ type of subdivision will increase the traffic on our already congested roads. The core settlement areas and designated town centers need transit-supportive land-use plans that encourage densification not automobile-dependent neighborhoods. The current core settlement areas (Saratoga Beach, Union Bay, Cumberland) are near community centers that can provide the goods and services people need, whereby encouraging other modes of transportation besides automobiles, such as walking or biking. The proposed subdivision will detract from compact growth options within Municipal Areas, therefore increasing traffic congestion.

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Decrease efficiency and affordability of our transit system — It is also important to note that for a transit system to be cost-effective, a bus needs to service a community frequently, and ridership must be high. The proposed development will not be able to provide either. Therefore the proposed development will need to be automobile-oriented and will further contribute to our reliance on automobile travel, also adding to greenhouse gas emissions.

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Increased cost to tax payers — The proposed development will maximize the public cost of housing by requiring high-cost infrastructure that will need to be maintained by the region. The proposed Riverwood subdivision is a continuation of car-centric development, which is responsible for the fiscal, environmental and social challenges our community is currently working to overcome. Previously, developers have encouraged development on the outskirts of our towns as they were able to purchase inexpensive land, therefore, motivated to promote the pushing of the municipal boundaries outward. This outward push has led to expensive servicing (roads, sewer, water) and traffic congestion (widening of roads and more bridges). This ‘donut’ type of development has drawn energy and resources away from our downtowns. The current RGS was developed to mitigate the negative impacts of ‘donut’ development. The provincially mandated strategy was created to build robust and cohesive communities. Communities that are affordable and are more connected and supportive for all community members. Once again, for fiscal reasons, it is essential to direct development to regional nodes and existing core areas. The Halifax Regional Municipality clearly articulates the cost of suburban versus urban for servicing in the *Sprawl Costs the Public More Than Twice as Much as Compact Development* (<https://usa.streetsblog.org/2015/03/05/sprawl-costs-the-public-more-than-twice-as-much-as-compact-development/>), Please see chart below.

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Not a ‘Walkable’ community: As noted in the Sustainability Matrix of 3L Developments' application, the proposed subdivision is classified as a ‘walkable’ community. Unfortunately, the proposed community does not fit into the Centre for Planning Excellence’s definition of walkable:

"Walkable communities that are desirable places to live, work, learn, worship and play are a key component of smart growth. Their desirability comes from two factors. First, goods (such as housing, offices, and retail) and services (such as transportation, schools, libraries) are located within an easy and safe walk. Second, walkable communities make pedestrian activity possible, thus expanding transportation options, and creating a streetscape for a range of users – pedestrians, bicyclists, transit riders, and drivers. To foster walkability, communities must mix land uses and build compactly, as well as ensure safe and inviting pedestrian corridors." (<https://www.cpex.org/what-is-smart-growth/>)

The proposed subdivision will have minimal, if any, goods or services to walk to; therefore, the community cannot be deemed walkable. Also, the proposed subdivision will draw development away from the core areas that are already in the planning stage.

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Possible negative impacts on seniors — It has also been pointed out by the 3L Developments’ planning team that the proposed subdivision will be good for seniors, to which I cannot entirely agree. As proposed, the neighbourhood characteristics will not foster a connected and cohesive community. Instead, and due to the disconnected nature of the subdivision (far from goods and services), the proposed development will exasperate the isolation of vulnerable seniors. Once again, infill and densification of core areas will encourage added community connections and proximity to community services. In this way, the plan as proposed will work against our regional priorities to create cohesive and connected communities for seniors.

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Negative impacts on critically important wetlands and salmon habitat: The Puntlage River is classified as one of the most critical salmon production areas on the east coast of Vancouver Island (DFO). The riparian and aquatic resources along the Puntlage River and Browns River at the point of confluence and throughout the system are fundamental to the survival of Pacific salmon in an era of climate change, loss of glacier resources and fluctuating rainfall patterns. We as a community, and as a region, need to consider the broader implications of multiple point source watershed impacts. Flow, temperature, in-stream nutrient transfer and stream-side nutrient inputs determine stream and ecosystem resilience and health. Having this development remove water from the system while impeding the natural percolation of precipitation through the soil profile due to impermeable development has a two-fold impact of negatively affecting hydrology and in-stream habitat. The Puntlage River is listed as currently having severe habitat concerns of low flows and high temperatures as detailed on page 24 *Helping Pacific Salmon survive the impacts of climate change on fresh water habitats; Pursuing Proactive And Reactive Adaptation Strategies*. The proposed Riverside subdivision will have adverse effects on the critically important Puntlage and Browns Rivers systems.

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***Chart: Increased cost to tax payers,**



Subject: FW: Form submission from: Comox Valley Regional District - Planning & Development Services

From: Comox Valley Regional District [<mailto:no-reply@cverdwebsite.ca>]

Sent: Sunday, September 30, 2018 1:07 AM

To: planningdevelopment@comoxvalleyrd.ca

Subject: Form submission from: Comox Valley Regional District - Planning & Development Services

Submitted on Sunday, September 30, 2018 - 01:06

Submitted by anonymous user: 50.92.246.35

Submitted values are:

Name Jennifer Devine

Email

Message

I oppose the amendment to the Regional plan in regards to the 3L proposed development of Stotan Falls.

The results of this submission may be viewed at:

<https://www.comoxvalleyrd.ca/node/2837/submission/1510>

Subject: FW: CVRD Board of Directors meeting Oct 2 2018 re: 3L and first bylaw reading
Attachments: CVCP 3LAmendment letter to CVRD Oct 2 2018.pdf

From: Erin Nowak

Sent: September 30, 2018 10:10 AM

To: Barbara Price - Town of Comox Councillor, Friends of Comox-Lazo Forest Reserve Society <bprice30@shaw.ca>; Bob Wells Courtenay Councillor <bwells@courtenay.ca>; bjolliffe <bjolliffe@comoxvalleyrd.ca>; Ken Grant Comox Councillor <kgrant@comox.ca>; Gwyn Sproule Cumberland Councillor <gwynsproule@gmail.com>; Erik Eriksson Courtenay Councillor <eeriksson@courtenay.ca>; Larry Jangula Courtenay Mayor <ljangula@courtenay.ca>; Manno Theos Courtenay Councillor <mtheos@courtenay.ca>; Rod Nichol CVRD Area B <rodnichol@shaw.ca>; Curtis Scoville - SAMBRA <curtisscoville@shaw.ca>

Cc: Alana Mullaly <amullaly@comoxvalleyrd.ca>; Russell Dyson <rdyson@comoxvalleyrd.ca>; Shannon Smith <ssmith@comoxvalleyrd.ca>

Subject: CVRD Board of Directors meeting Oct 2 2018 re: 3L and first bylaw reading

To Comox Valley Regional District Board of Directors,

Re: Regional Growth Strategy Standard Amendment re: 3L and first bylaw reading Oct 2 2018

The Comox Valley Conservation Partnership (CVCP) was established in 2008 and represents the interests of twenty-four volunteer and non-profit organizations working to promote the environmental and economic values of conservation in our natural areas. **The CVCP is opposed to 3L Development Inc.'s proposal to amend the Regional Growth Strategy (RGS) such that it enables the creation of a new settlement node.** This amendment, if approved, has the potential to cause detrimental impacts to the integrity of the natural environment and the Valley's livability.

As outlined in the attached letter, at this point in the 3L Consultation Plan, the CVCP urges the Board to **vote in denial** of the first reading of an amendment bylaw at the CVRD Board of Directors meeting (Oct 2, 2018). Please feel free to call with any additional questions or comments.

Sincerely,



**ERIN
NOWAK**

Program Coordinator
Comox Valley Conservation Partnership
P: 250.203.5644
E: erin@cvlandtrust.ca
W: www.cvlandtrust.ca

**Erin Nowak**

Program Coordinator
(250) 203-5644
Email: erin@cvlandtrust.ca

Mailing Address

P.O. Box 3462
Courtenay, BC V9N 5N5

Office:

2356a Rosewall Crescent
Courtenay, BC, V9N 8R9

Partner Organizations

Comox Valley Land Trust
Project Watershed
Millard-Piercy Watershed Stewards
Morrison Creek Streamkeepers
Beaufort Watershed Stewards
Comox Valley Nature
Comox Valley Water Watch Coalition
Brooklyn Creek Watershed Society
Perseverance Creek Streamkeepers
Cumberland Community Forest
Society
Mack Laing Heritage Society

Support Organizations

CV Sustainability Project
CV Council of Canadians
Friends of Comox Lazo Forest Society
Forbidden Plateau Road Residents
Association
Black Creek Streamkeepers
Saratoga and Miracle Beach Residents
Association
Arden Area Residents Association
Friends of Strathcona Park
Merville Area Resident's & Ratepayers
Association
VI Whitewater Paddling Association
Mountaineer Avian Rescue Society
Macdonald Wood Park Society
Tsolum River Restoration Society

Funding Partners

Real Estate Foundation of B.C.
Community Gaming Grant
RBC Blue Water Fund
Comox Valley Regional District
City of Courtenay
Village of Cumberland

www.cvlandtrust.ca/cvcp/

Date: Sept 30th, 2018

Re: 3L Developments Inc and Amendment to the Comox Valley Regional Growth Strategy

Dear Comox Valley Regional District Chair and Directors.

The Comox Valley Conservation Partnership (CVCP) was established in 2008 and represents the interests of twenty-four volunteer and non-profit organizations working to promote the environmental and economic values of conservation in our natural areas. **The CVCP is opposed to 3L Development Inc.'s proposal to amend the Regional Growth Strategy (RGS) such that it enables the creation of a new settlement node.** This amendment, if approved, has the potential to cause detrimental impacts to the integrity of the natural environment and the Valley's livability.

Natural Environment

In the RGS, the CVRD board endorsed the need for a regional coordinated effort to protect and link the Valley's remaining sensitive ecosystems. In 2014, the CVCP and the CVRD jointly conducted an analysis to assess the status of the remaining sensitive ecosystems in the Comox Valley lowlands. Our analysis revealed that over the past 2 decades, sensitive ecosystems continue to be lost and degraded at an alarming rate. As of 2014, less than 5% of the previously extensive and connected network of sensitive ecosystems remain in an intact condition. Notwithstanding this fact, the Puntledge and Browns River corridors have been highlighted in local, regional and national conservation plans as high-priority areas for conservation. These include science-based conservation plans prepared by the Comox Valley Land Trust (2017), Ecofish Research Ltd on behalf of the Fish and Wildlife Compensation Program (2017), and the Nature Conservancy of Canada (2015).

The CVCP strongly believes that the proposed development will detrimentally impact sensitive ecosystems occurring on the subject parcels both directly and indirectly, as well as eliminate opportunities to improve the ecological integrity of these natural areas identified as having high-conservation value.

A coarse-scale desktop review of the proposed development recently undertaken by the CVCP suggests that significant portions of the subject parcels are not developable. This includes numerous Statutory Rights of Way registered on title, areas that would be protected under the Provincial Riparian Areas Regulation (RAR) as Streamside Protection and Enhancement Areas (SPEA), as well as areas of steep slopes (>30%). CVRD development permit regulations, parkland dedication requirements and Return to Crown notations on the riverbed itself add additional constraints to the developable area. Combined, these areas are roughly equivalent in both area and location to what the proponent is suggesting to "donate" as parkland. Therefore, given that these areas are not at risk of being developed **there is no meaningful uplift in the conservation of critical natural areas in the 3L development proposal.**

Livability

In 2010 the Regional Board adopted a long term vision for the Comox Valley's development; which included a lengthy and inclusive public process. The RGS includes eight policy areas, intended to **reduce urban sprawl, promote sustainability**, reduce water consumption and greenhouse gas emissions, divert solid waste and promote active transportation, affordable housing and a resilient economy.

- The 3L proposal is **contrary** to the fundamental spirit and intent of the RGS which is to concentrate 90% of the region's population in the Core Settlement Areas.
- Eight years into the implementation of the RGS, Core Settlement Areas still have **plenty of capacity** to accommodate additional population growth.
- The **scale** of the proposed development effectively creates a new Core Settlement Area which would slow down development in the other Core Settlement Areas and thus frustrate the delivery of compact transit-oriented communities envisioned by the RGS.
- 3L's proposition that the amendment should be looked at as "repositioning of densities allowed under the current RGS" (p1, May 2018 letter) from other development projects is premised on the **failure** of its competitors to deliver housing in the designated areas.
- In the developers own words "we are a positive catalyst for the larger development pattern in the area" (p3, 2010 3L submission). In other words, this developer acknowledges its project is a **precedent** for more urban sprawl contrary to the managed growth envisioned by the RGS.

The CVCP supports processing RGS amendments the right way that "involve" the public. The CVRD Board of Directors endorsed that sentiment by adopting a consultation plan, which defines the public participation goal of public involvement as *"to work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered"*.

At this point in the 3L Consultation Plan, the CVCP urges the Board to **vote in denial** of the first reading of an amendment bylaw at the CVRD Board of Directors meeting (Oct 2, 2018).

Sincerely,



Erin Nowak
Program Coordinator
Comox Valley Conservation Partnership

cc Russell Dyson, Chief Administrative Officer, CVRD
Alana Mullaly, Manager of Planning Services, CVRD

Subject: FW: RGS

From: Patricia Childs
Sent: September 29, 2018 5:23 PM
To: Alana Mullaly <amullaly@comoxvalleyrd.ca>
Subject: RGS

I do NOT agree that 3L Developments should be allowed to amend the Regional Growth Strategy to allow 750 to 1100 homes in the Stotan Falls area for personal financial gain. It is more important to preserve our watersheds and wildlife and preserve our rural areas and prevent urban sprawl. This is not going to add affordable housing or benefit anyone locally. Please defend the future growth of our valley and adhere to the rules of the Regional Growth Strategy.

Thank you
Patricia Childs

Subject: FW: Oct 2nd First reading of 3L Proposal

From:

Sent: September 28, 2018 12:23 AM

To: [bjolliffe <bjolliffe@comoxvalleyrd.ca>](mailto:bjolliffe@comoxvalleyrd.ca); rodnichol@shaw.ca; eeriksson@courtenay.ca; ljangula@courtenay.ca; mtheos@courtenay.ca; bwells@courtenay.ca; kgrant@comox.ca; bprice@comox.ca; gwynsproule@gmail.com; CurtisScoville@shaw.ca

Cc: Alana Mullaly <amullaly@comoxvalleyrd.ca>;

Subject: Re: Oct 2nd First reading of 3L Proposal

Dear CVRD Directors – a post script to my below letter to you.

A small typo is not usually important enough to lose sleep over, but in this instance, it might well do just that. When I wrote the letter to you, I put a question mark beside a word I felt I could find a stronger choice for, and I missed doing that and removing the question mark in the final edit. Please see below. I most certainly was not implying that the Region Growth plan was **not firmly** adopted~!

My apologies for an extra email.

Sincerely,
Vivian Ruskin

From:

Sent: Thursday, September 27, 2018 8:02 PM

To: bjolliffe@comoxvalleyrd.ca ; rodnichol@shaw.ca ; eeriksson@courtenay.ca ; ljangula@courtenay.ca ; mtheos@courtenay.ca ; bwells@courtenay.ca ; kgrant@comox.ca ; bprice@comox.ca ; gwynsproule@gmail.com ; CurtisScoville@shaw.ca

Cc: Alana Mullaly ;

Subject: Oct 2nd First reading of 3L Proposal

Dear CVRD Directors,

Rather than repeat things that have already been said or written, We will try to keep our letter short and to focus on the sole purpose of the upcoming meeting and reading.

I respect each and every one of you for all the time you spend in your capacity as a board member looking after the residents of the Comox Valley and our collective best interests.

We have lived here for 10 years and have been here for most of the 3L saga. We visited the CVRD in 2009, when we first heard about the possibility of a developer wanting to put in a subdivision by Stotan Falls. Having spoken to several CVRD staff members over those years, we do have a background in how complicated this became. And here we are, all these years later, trying to sort this out.

To us, the matter is simple (although we know it has become anything but). We were part of the public input into the birth of the RGS (Regional Growth Strategy)– a long process of cooperative consultation and study with Courtenay, Comox and Cumberland. And then it was complete. **Certainly it was impossible to create a plan that would be perfect to all concerned, but it was firmly adopted with its long range plans for how to best handle the Comox Valley’s inevitable growth.**

And then the developer resurfaced with his detailed proposal to build an enormous subdivision on RU20 land, to be called, Riverwood, and here we all are.

So back to the simple part. That land is RU20 and was designated as such for good reason. It is not one of the RGS's official growth nodes. Period. If this development goes through, all faith will be lost in our elected leaders and it will cast doubt on the integrity of the CVRD and the RGS. All to accommodate the wishes of one developer?? We think every valley resident will be able to draw upon personal experience of 'making an exception' and regretting that decision. "You let him have it. Why can't I have that? I have even better reasons~!"

It's wrong to say 'yes' to them.

And yes, there are many, many reasons why we feel a development in that location would be folly, but that's not what this process is all about. Someone asked me last week whether I would be 'okay' with this plan if it was in another location in the valley. I said, Absolutely. IF and only if it was in one of the official settlement nodes. If it wasn't, then, No~! We realize that there were unforeseen legal issues that arose during this process but it is our understanding that we are now at the stage where this can be vetoed as it was originally.

We resent the enormous amount of time and money this proposal, with all its drama, has cost the CVRD and all the taxpayers. There are many other issues in the Comox Valley that need that time, focus and tax dollars.

We are trusting you to make the best decisions for all of us. Again, our deep appreciation for your time and dedication to all the work you do.

Sincerely,

Vivian and Steve Ruskin

2380 Jaqueline Dr.
Courtenay, BC

Area C

Subject: FW: CVRD Directors RE: Tuesday's 3L vote

From: Dan Vie

Sent: October 1, 2018 12:24 PM

To: bjolliffe <bjolliffe@comoxvalleyrd.ca>; rodnichol@shaw.ca; eeriksson@courtenay.ca; ljangula@courtenay.ca; mtheos@courtenay.ca; bwells@courtenay.ca; kgrant@comox.ca; bprice@comox.ca; gwynsproule <gwynsproule@gmail.com>; CurtisScoville@shaw.ca

Cc: Alana Mullaly <amullaly@comoxvalleyrd.ca>

Subject: To: CVRD Directors RE: Tuesday's 3L vote

About Tuesday's 3L vote.

A brief note to encourage you, please look over the attachments in the CVRD report. The public statements are comprehensive (see the Appendices itemized on Tuesday's agenda). Our staff's reasoning for refusal is sound, they are satisfied our legal obligations have been met and we need not evaluate this further. The environmental risks are damning. Above all, the financial argument is the clincher - allowing this scale of growth here, in this sensitive location, will rob resources needed for existing infrastructure commitments.

This is for any of you currently on the fence. Please, say 'no' to 3L's amendment at First Reading and stop wasting further time, energy and community resources entertaining this any further. Preserve the RGS as it stands.

Thank you.

Dan Vie
Courtenay, B.C.