

**From:** [Teresa Warnes](#)  
**To:** [Jake Martens](#); [Lisa Dennis](#)  
**Subject:** FW: Form submission from: Request to Appear as a Delegation  
**Date:** Monday, July 23, 2018 10:28:37 AM

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**From:** Comox Valley Regional District [mailto:no-reply@cprdwebsite.ca]  
**Sent:** Monday, July 23, 2018 9:56 AM  
**To:** administration <administration@comoxvalleyrd.ca>  
**Subject:** Form submission from: Request to Appear as a Delegation

Submitted on Monday, July 23, 2018 - 09:56

Submitted by anonymous user: 24.244.23.188

Submitted values are:

Name(s) of person(s) speaking: Lisa (caroline) Christensen

Organization Information

Organization you are representing: Self

Primary purpose of the organization: To speak in support of the amendment to the RGS being reconsidered as major

Number of members: 1

Mailing Information

Mailing address: 361 Woods Ave

City: COURTENAY

Postal code: V9N 3Y7

Contact name: Lisa Christensen

Meeting Details

Subject matter:

I would like to summarize the following letter I have written to the CRVD stating concerns over the fact that the minor amendment being considered does not fit the definition of minor.

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Good Morning, honourable board members.

My name is Lisa Christensen and I would like to offer my insights and concerns into the issue of the upcoming vote on the 'minor' amendment to the RGS regarding 3L development.

First allow me to clarify that I am not against development in general, but rather I am against developers being allowed to skirt due process in the 'spirit of expediency'. That a developer can use bullying tactics to try and get his way with our board at the expense of that due process. The issue at hand is not "Should 3L be allowed to pursue a development" but rather "Does this amendment to the RGS qualify for being pursued under the minor stream or is it best served the due process of a standard amendment?"

It is the board's duty to decide whether an amendment is relevant to pass, and whether that amendment should be considered as a major or a minor track item. At the first Committee of the Whole vote, it was very troubling for me to hear Mr Kabal try and push talk of lawyers and legal involvement over something he had allegedly been promised by only one or two members of the COW. He was corrected by the chair as far as, according to regulations, only a vote by the entire committee can lead to the passing or failing of an amendment.

One member cannot make and keep promises that bind the entire board, who are honour bound to vote to the best of their ability, on behalf of the people they were elected to represent. The matter has twice been shown contentious enough to falter in the minor amendment track, given the two instances where the COW failed to pass the amendment on the minor track and the results were only altered by pleas of the 3L representatives to change the rules of the game from provincial to local, and then out of an abundance of caution, to save the two thirds majority clause for the council in its entirety.

A minor amendment should be, by definition, minor. Something that all of the board could feasibly agree upon. Something all the of the board could feel confident the people who elected them would agree upon. Something that needed very little further consult or vetting.

There is no way that this amendment could possibly be considered as minor, by the very definition of matter given in RGS.

Amendments to the RGS.

Regarding minor amendments:

3.a) where a land use or development proposal is inconsistent with the RGS, and, in the opinion of the CRVD board:

is NOT to be of regional significance in terms of scale, impacts, or precedence

contributes to achieving the goals and objectives set out in Part 3; and

contributes to achieving the general principles contained in the growth management strategy

Further, MG policy 1B-4 could offer some clarification as it states “Should minor adjustments to existing settlement node boundaries be identified through a local area planning process, such boundary adjustments shall be permitted subject to a minor amendment to the RGS” Whereas MG policy 1B3 on new settlement nodes, immediately preceding, states that

“designation of any new settlement node will require an amendment to the regional growth strategy.

It does not specifically disallow a minor amendment in that case but it definitely does not recommend one as it does in dealing with a 'minor change' to an existing node. New settlement nodes are by definition far from minor. They tend to be (particularly so in this case) regionally significant in terms of scale and impact, inconsistent with the land use already zoned for, and fail to achieve the general principles contained in the growth management strategy.

The steering committee is comprised of specialists and paid to research the issue. The committee report advised against the amendment being considered minor. Before developing further afield the policies of the RGS state to first “increase housing opportunities in existing residential areas in Core Settlement Areas by encouraging multi family conversions, secondary suites and small lot infill. The steering committee report found that existing core settlement areas and existing nodes area not even close to capacity for development.

Many of you are very focused on the potential of the donated parkland. We should not be so focused on the park that we forget the bigger picture. More important than the recreational area is the protection of the wildlife corridor and the watershed. A change from rural 2 homes per 20h (40 homes) up to a density of up to 1000 homes in the same area (the number on paper was 740 but Mr Kabal was quoted at 1000 during questioning at the first meeting I attended.) could in no way be construed as a minor change to the RGS. This would involve changes to multiple policy areas such as housing, ecosystems, natural areas and parks, transportation, infrastructure, and public health and safety.

The park itself, while an intriguing idea to the public at first glance, would be better served left in its current form. Our valley has few enough natural places left. To encourage further exploitation of this delicate watershed and wildlife corridor is to invite conflict down the line. The RGS was created to protect the integrity of our natural areas. It identifies this area as a critical watershed and we have spent so much money repairing damage other developments have done we would do well to examine the impacts of this one in depth before allowing drastic changes to be made.

There is already a lot of traffic to the river. Adding 740+ (again, remember that Kabal was quoted at 1000 homes during questioning at the COW meeting) homes complete with families and guests will add a lot of toxic run off from vehicles, lawn products, and sunscreen (a recent article in the July 5th Vancouver Sun "Is sunscreen killing BC's Cowichan River?" goes into the details of how detrimental this can be, "In the US researchers discovered that 1200 swimmers would go through 76.8 kilograms of sunscreen a day and that the mist from aerosolized sunscreen carries for 450 metres.) Without further info we can only guess as to the impacts of sewage treatment – where will the resulting products go?

The changing of a rural zone to one of high density urban nature would definitely affect the long term health of our climate. I recently attended a public info and planning session on our Urban Forest Strategy, hosted by Diamond Head Consulting on behalf of the City of Courtenay. According to the city's website "Communities around the province are adopting urban forest strategies to address environmental protection, stormwater management, climate change, habitat protection, and liveability."

I was personally unaware that trees and green spaces actually hold a monetary value in regards to their ability to sequester carbon and this is but one thing the city is interested in with their investigation into the health of our urban forest. For example, a 50 year old oak forest could sequester 30,000 pounds of carbon dioxide per square acre, emitting 22000 pounds of

oxygen in a year. This does a great deal, passively, to mitigate the pollution of our busy city.

The City of Courtenay has hired Diamond Head Consulting to conduct a survey and collect data on the state of our urban forest and how it contributes to issues such as flood mitigation and air quality. “An Urban Forest Strategy is a planning tool that identifies opportunities and challenges for trees and forest stands on public and private land. The City’s strategy is expected to set a canopy cover target for the community as a whole, and for specific areas and land uses. The canopy cover target will inform which areas should be a priority for tree protection, and in which areas replanting would be beneficial.”

When the city is just beginning this very important study it would be folly to rush into a development in one of our most vital watersheds and wildlife corridors. Better to prevent damage than to have to spend the money to fix the effects down the line.

The settlement can not be seen as a minor amendment no matter how you look at it, and there should be no such thing as masquerading a major amendment as a minor for 'the sake of expediency', such a folly would be a dangerous precedent as well as uncover some major unseen flaws if the process was not as fullsome as it needs to be. The blame would lie on the directors if the minor process overlooked any major issues.

If the amendment is corrected to be viewed as a major one, as it clearly is, then all sides of the story will be more completely exposed. More thorough investigations will be done.

Any delays to the development are not the fault of the board. They are part of the due process needed to make such major changes to the RGS. Changes that should not be taken lightly or rushed because a developer is concerned about his timing. The upcoming election has been stated as a reason to rush this along. This concerns me deeply. It should not matter who is elected to our board, they will use their competence to govern wisely based off the information given. Expediency is no excuse for ignoring the very definition of what 'minor' means and rushing through drastic alterations to our hard won RGS.

This amendment to the RGS will indeed affect all of the surrounding areas, Cumberland, Courtenay, Comox, Royston. There likely should be involvement with the people of the First Nations, as well as plenty of public input and environmental study. The changes to infrastructure are immense and deserve a fullsome investigation and time to completely pursue the potential fallout and what will be done to mitigate it.

Thank you for considering my input.

Lisa (Caroline) Christensen

Specific request of the regional district, if any (i.e. letter of support, funding):  
to consider their vote over the 'minor' amendment to the RGS very carefully

Requested meeting date: July 24th 2018

Audio-visual equipment needed: none

Information for contact purposes only

Telephone number: [REDACTED]

Email address: [REDACTED]

The results of this submission may be viewed at:

<https://www.comoxvalleyrd.ca/node/1746/submission/1003>

