

**DATE:** September 1, 2020**FILE:** 3110-20/ALR 1C 20**TO:** Chair and Directors  
Electoral Areas Services Committee**FROM:** James Warren  
Deputy Chief Administrative OfficerSupported by James Warren  
Deputy Chief Administrative  
Officer*J. Warren***RE:** **Subdivision within the Agricultural Land Reserve**  
**7985 Island Highway North (Peeters)**  
**Puntledge – Black Creek (Electoral Area C)**  
**Lot A, Block 29, Comox District, Plan VIP61660, PID 023-153-776****Purpose**

To consider an application (Appendix A) to allow a two-lot subdivision of an Agricultural Land Reserve (ALR) property.

**Recommendation from the Deputy Chief Administrative Officer:**

THAT Agricultural Land Reserve application ALR 1C 20 (Peeters) for a two-lot subdivision of the property described as Lot A, Block 29, Comox District, Plan VIP61660, PID 023-153-776 (7985 Island Highway North) be refused;

AND FINALLY THAT the application not be referred to the Agricultural Land Commission.

**Executive Summary**

- The subject property is 18.7 hectares in area, and it is in the ALR. The property is used for hay production, and is severed by Ployart Creek.
- The eastern portion is developed with a single detached dwelling, three barns and three accessory buildings, and is accessed from Island Highway. The western portion is undeveloped, and is accessed from Endall Road or by a bridge crossing Ployart Creek.
- The applicant proposes to subdivide the property into two lots, with each lot being approximately 9.35 hectares in area.
- According to the applicant, due to increased storm events, access to the western portion via the bridge gets more challenging over time. The proposed subdivision would improve agricultural potential on both portions. As a separate property, another owner could farm the western portion independently.
- The proposed lots meet the minimum 8.0 hectare lot area minimum of the Rural ALR (RU-ALR) zone.
- The proposed subdivision fragments ALR land, and would increase the potential residential density, which are inconsistent with Agricultural Areas policies of the OCP.
- The Agricultural Advisory Planning Commission (AAPC) reviewed the application and recommended refusal of the application.

- A referral was sent to Ministry of Agriculture for comments. Provincial staff is not supportive of the proposed subdivision because there are other farms that are separated by watercourses, flooding normally occurs outside of growing season, and subdivision would further fragment ALR lands and increase the land cost per hectare.
- Based on these factors, staff recommends the application not be supported and not be referred to the Agricultural Land Commission (ALC).

Prepared by:

Concurrence:

Concurrence:

***B. Chow******T. Trieu******S. Smith***


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 Brian Chow, RPP, MCIP  
 Rural Planner

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 Ton Trieu, RPP, MCIP  
 Manager of Planning Services

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 Scott Smith, RPP, MCIP  
 General Manager of Planning and  
 Development Services Branch
**Government Partners and Stakeholder Distribution (Upon Agenda Publication)**

Applicant	✓
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**Background/Current Situation**

The subject property is an 18.7 hectare lot in Puntledge – Black Creek Electoral Area (Electoral Area C), and is in the ALR (Figures 1 and 2). The subject property is severed by Ployart Creek, which is designated to be returned to Crown. According to the applicant, the eastern portion is accessed by Island Highway, and the western portion is accessed by Endall Road as well as a bridge across Ployart Creek. The entire property is used for hay production. In 2019, the eastern portion produced 23.5 metric tonnes of hay, and the western portion produced 39.0 metric tonnes of hay.

With respect to existing structures, there are three garages, three barns and a single detached dwelling on the eastern portion (Figures 3 and 4). These structures are clustered near the driveway off from Island Highway. The western portion does not have any buildings or structures.

The applicant proposes to subdivide the property into two lots, whereby the proposed lot line is west of Ployart Creek. Both of the proposed lots are approximately 9.35 hectares in area (Figures 3 and 4). The proposed lot line is west of the wetland around Ployart Creek, so that the wetlands on both sides of Ployart Creek remain as one for the eastern portion to maintain.

According to the applicant, the existing bridge is often wet or flooded, which restricts access. There is limited opportunity to manage water due to environmental protection around Ployart Creek, which is a tributary to Black Creek. With increased storm events, access to the western portion gets more challenging over time. Therefore, the purpose of subdivision is to keep the agricultural potential for the eastern portion at its current state and increase the agricultural potential for the western portion. As a separate property, another owner can look after the western portion independently. Appendix A includes more of the applicant's reasons for this subdivision proposal.

## Planning Analysis

### Agricultural Land Reserve Analysis

The property is located within the ALR. Section 21(2) of the *Agricultural Land Commission Act* (ALCA) allows an owner of property within the ALR to apply to the ALC to subdivide that property. Section 25(3) requires that such an application first be authorized by the local government to proceed to the ALC.

### Official Community Plan Analysis

Bylaw No. 337 being the “Rural Comox Valley Official Community Plan Bylaw No. 337, 2014” designates the subject property within Agricultural Areas. Section 58(1) states, “Discourage subdivision of land in the ALR for residential use, other than an ALC approved home site severance.” The proposed two-lot subdivision would create a new lot, which will have an opportunity to have increase residential density on agricultural lands.

Section 58(8) states, “Discourage subdivision of land in agricultural areas to preserve contiguous areas of agricultural land,” and Section 58(9) states, “Encourage consolidation of smaller parcels of agricultural land into larger, more viable agricultural lots.” The proposed subdivision would fragment farmland.

Section 58(12) states, “Require an applicant proposing to subdivide land in the agricultural area to demonstrate how the proposal will benefit the agriculture and aquaculture industries.” According to the applicant, due to seasonal flooding, access to the western portion is limited. Further, there is no clear line of sight to this portion from the eastern portion, where the residential use currently exists. Therefore, the agricultural potential of the western portion is affected because storage of machinery, equipment, and buildings are at risk for theft and damage. In addition, no livestock can be kept on the western portion, as the owners cannot keep a close eye on the animals. If the bridge is flooded out, getting to the western portion would require a 1.9 kilometre drive southward along Old Island Highway and westward along Endall Road. The proposed lot area of 9.35 hectares for the western portion would discourage hobby farming.

Some of these applicant’s reasons for subdivision may be addressed by having a second dwelling on the western portion. As the subject property currently has one single detached dwelling, the applicant is permitted to place a manufactured home for immediate family members on the western portion. This option is available until December 31, 2020. Currently, Ministry of Agriculture is proposing more residential flexibility in the ALR, as outlined in a policy intentions paper released on January 27, 2020. As of the date of this staff report, the Ministry has not published its policy direction yet. Nevertheless, there may be more types of second dwelling available for the applicant to choose from in the future.

### Zoning Bylaw Analysis

The property is zoned Rural-ALR (RU-ALR). The proposed lots meet the minimum 8.0 hectare lot area requirement in the RU-ALR zone. Section 501(1)(iii) of the Zoning Bylaw, Bylaw No. 520, being the “Rural Comox Valley Zoning Bylaw No. 520, 2019”, states that the minimum lot frontage shall be 10 per cent of the perimeter of the lot. Both of the proposed lots do not meet this minimum lot frontage requirement. If the subdivision were to be supported by the CVRD Board and later approved by the ALC, a variance would be required to reduce the minimum highway frontage at the subdivision stage.

As the proposal does not meet the listed OCP policies, staff recommend that the CVRD Board not support the proposed subdivision and not refer the application to the ALC.

**Policy Analysis**

Section 21(2) of the ALCA allows an owner of property within the ALR to apply to the ALC to subdivide that property. Section 25(3) of the ALCA states that this type of application may not proceed to the ALC unless authorized by a resolution from the local government.

**Options**

The CVRD Board may support or not support the subdivision application, and also decide whether to refer the application to the ALC. Staff recommend the application be refused and not to refer the application to the ALC on the basis that it is not consistent with the OCP.

**Financial Factors**

Fees of \$1,500.00 (\$300.00 for the CVRD and \$1,200.00 for the ALC) have been collected for this non-farm use application in accordance with Section 35 of the ALCA. If the CVRD Board decides not to refer the application to the ALC, the ALC portion of the fee will be returned to the applicant.

**Legal Factors**

This report and the recommendations contained herein are in compliance with the ALCA and CVRD bylaws.

**Regional Growth Strategy Implications**

Bylaw No. 120, being the “Comox Valley Regional District Regional Growth Strategy Bylaw No. 120, 2010” designates the subject property within Agricultural Areas, which were established using ALR boundaries. The main objective of this designation is to protect agricultural land and expand agricultural activities for local food security. It is the intent of the RGS to reinforce the policies and procedures within the ALR in order to support agricultural practices.

**Intergovernmental Factors**

A referral was sent to Jill Hatfield, Regional Agrologist at Ministry of Agriculture for comment on this application. On July 31, 2020, Jill Hatfield, along with Reed Bailey, Land Use Planner with Ministry of Agriculture, provided their comments (Appendix B). Provincial staff recognizes the applicant’s challenge of accessing both portions of the property severed by Poyart Creek, which often floods. Nevertheless, other farmers have to deal with severed, separate parcels of their farmland, and flooding normally happens outside of growing season. Furthermore, there are currently other active farms that are severed by Poyart Creek and Black Creek. The proposed subdivision would result in further fragmentation of ALR land and may increase cost of land on a per hectare basis, which limits future farm business opportunities. Most of the soils are within the prime, improved classes 1 to 3 agricultural capability ratings. Finally, Provincial staff suggest that the applicant may consider a lot line adjustment with an adjacent lot as an alternate option to meet many, if not all, of the applicant’s needs.

**Interdepartmental Involvement**

This ALR application was circulated to CVRD departments, and no comments were received.

**Citizen/Public Relations**

The AAPC met on July 23, 2020, to discuss this application. A motion to not support the proposal for the following reasons:

- The riparian area is not a sufficient reason for subdivision, as many other ALR lands have similar constraints;
- The applicant's concerns of housing, livestock safety and travelling along the Island Highway to get to the western portion can be addressed by having a second dwelling on the western portion;
- The creation of a new lot will increase property values, and make them less viable for future farming;
- Larger agricultural lots are in demand; and
- Family succession planning can be done without subdivision.

Attachments: Appendix A – “ALC Application Submission ALR 1C 20”  
Appendix B – “Ministry of Agriculture Comments”

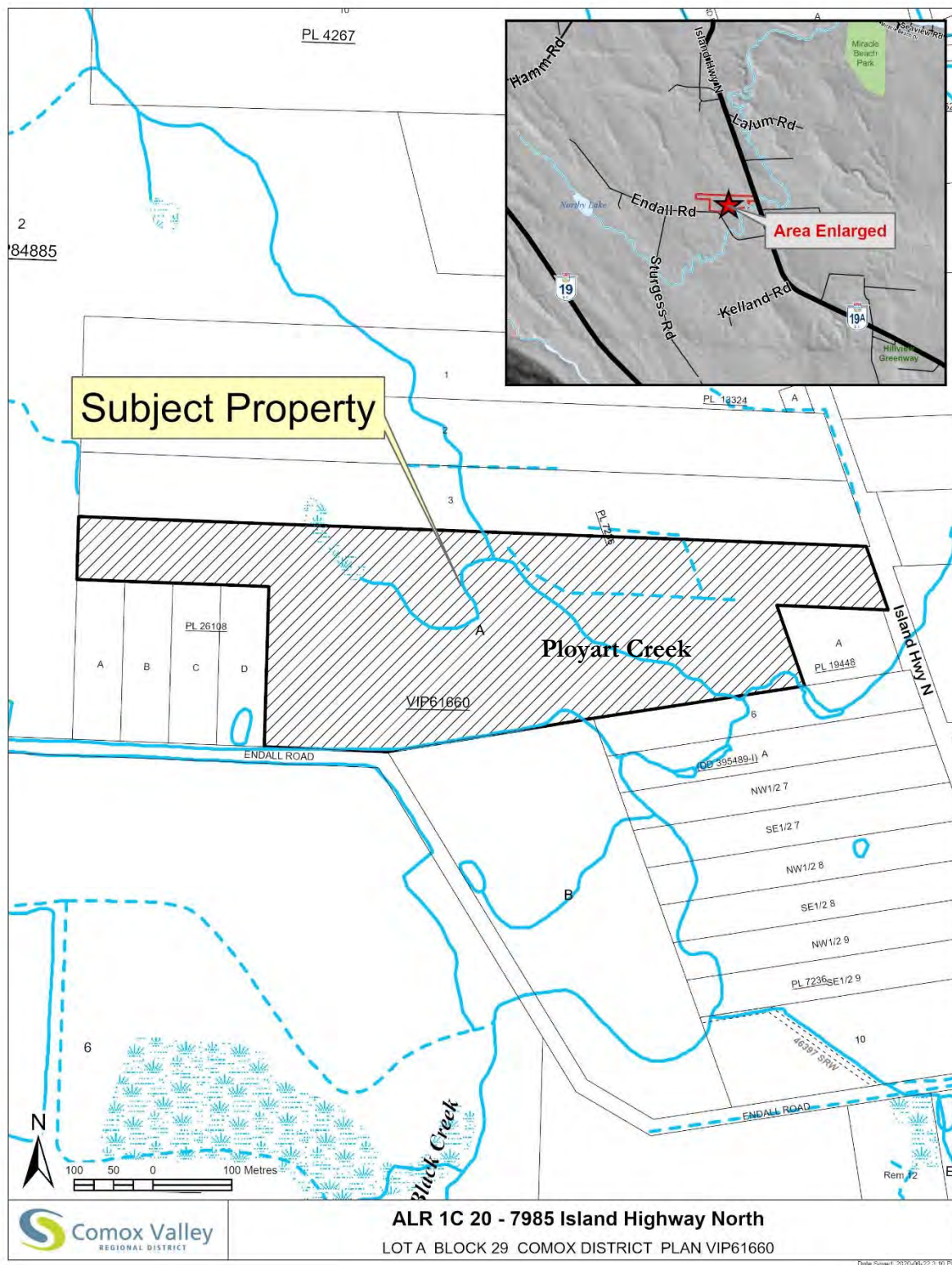


Figure 1: Subject Property Map



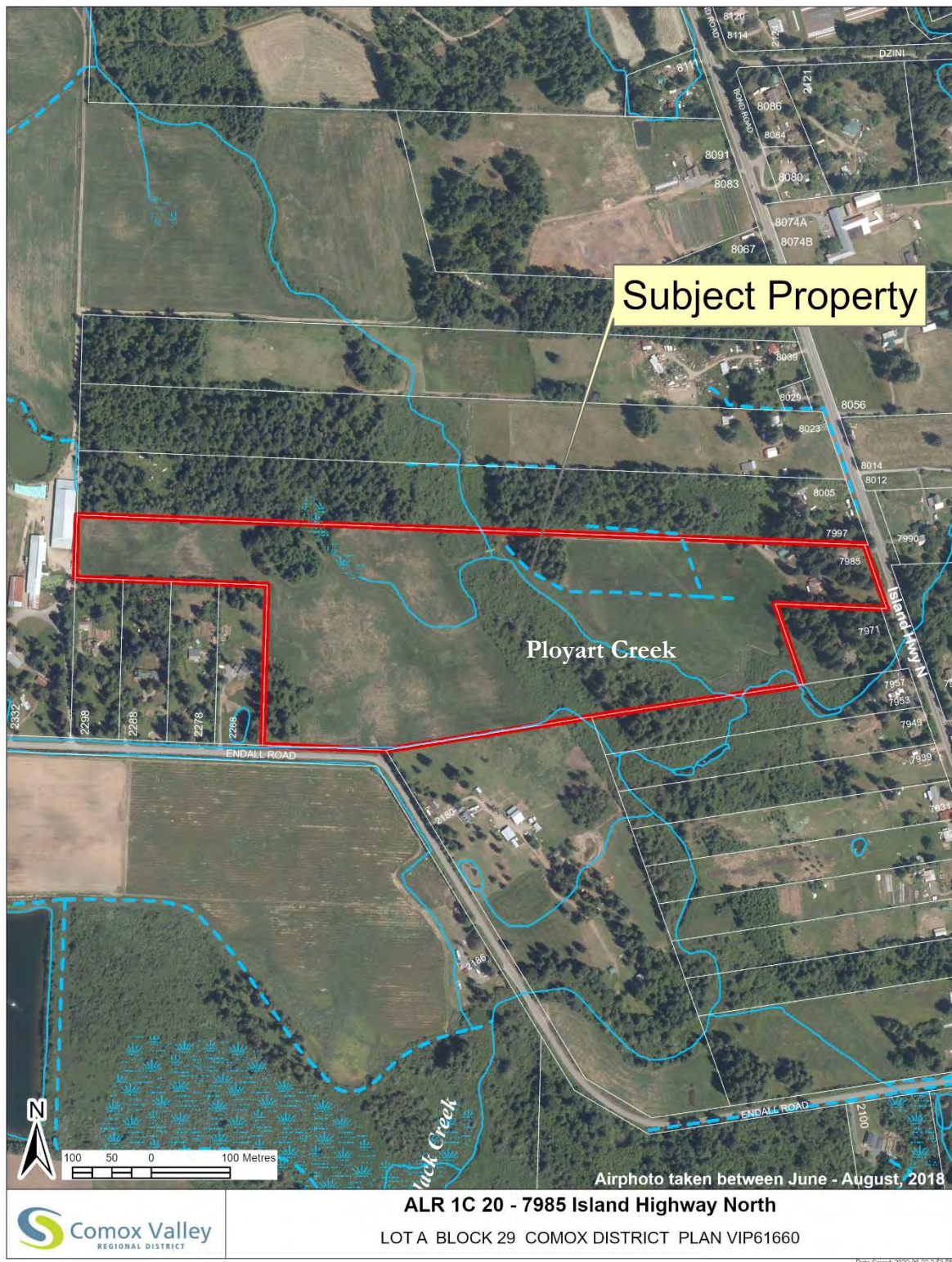
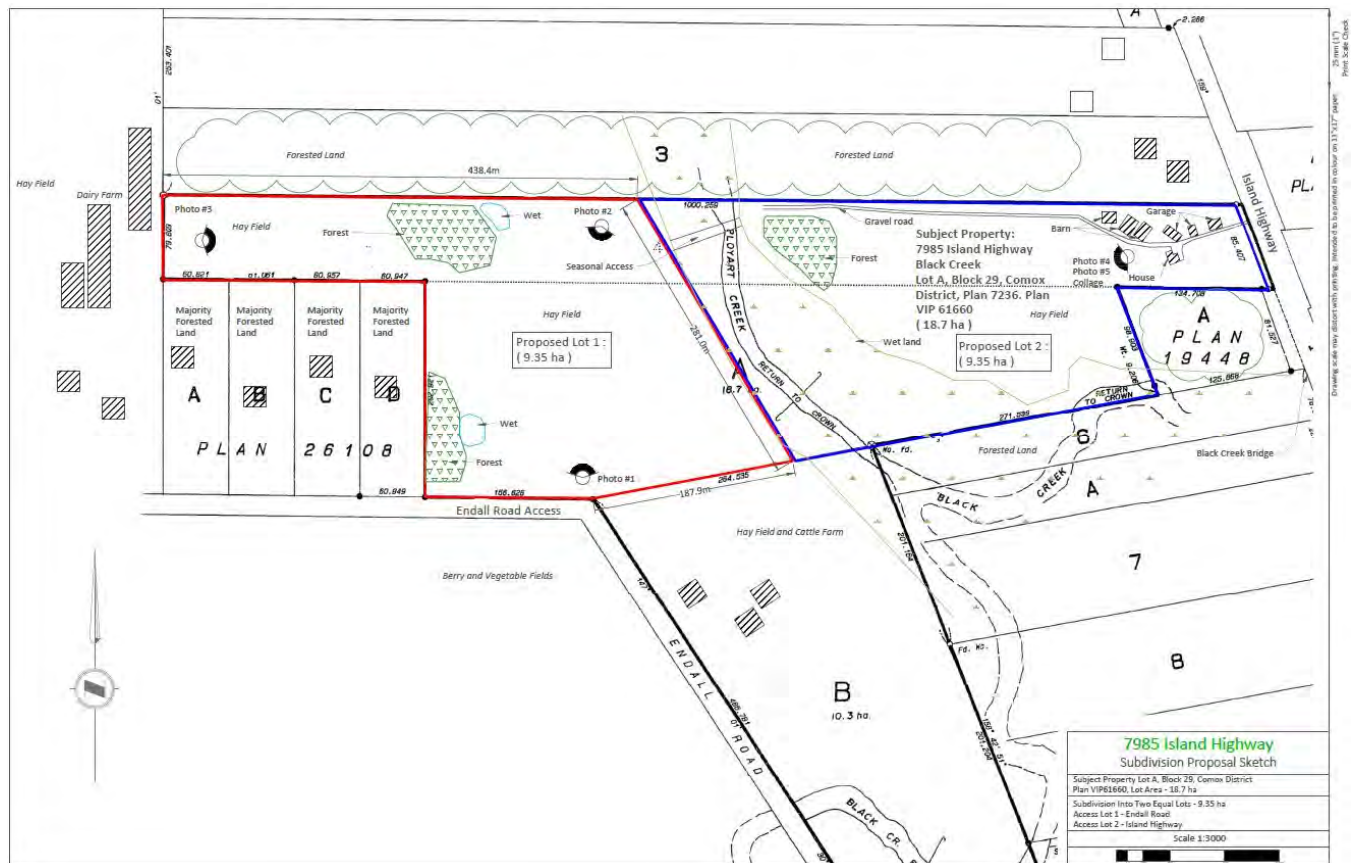


Figure 2: Air Photo





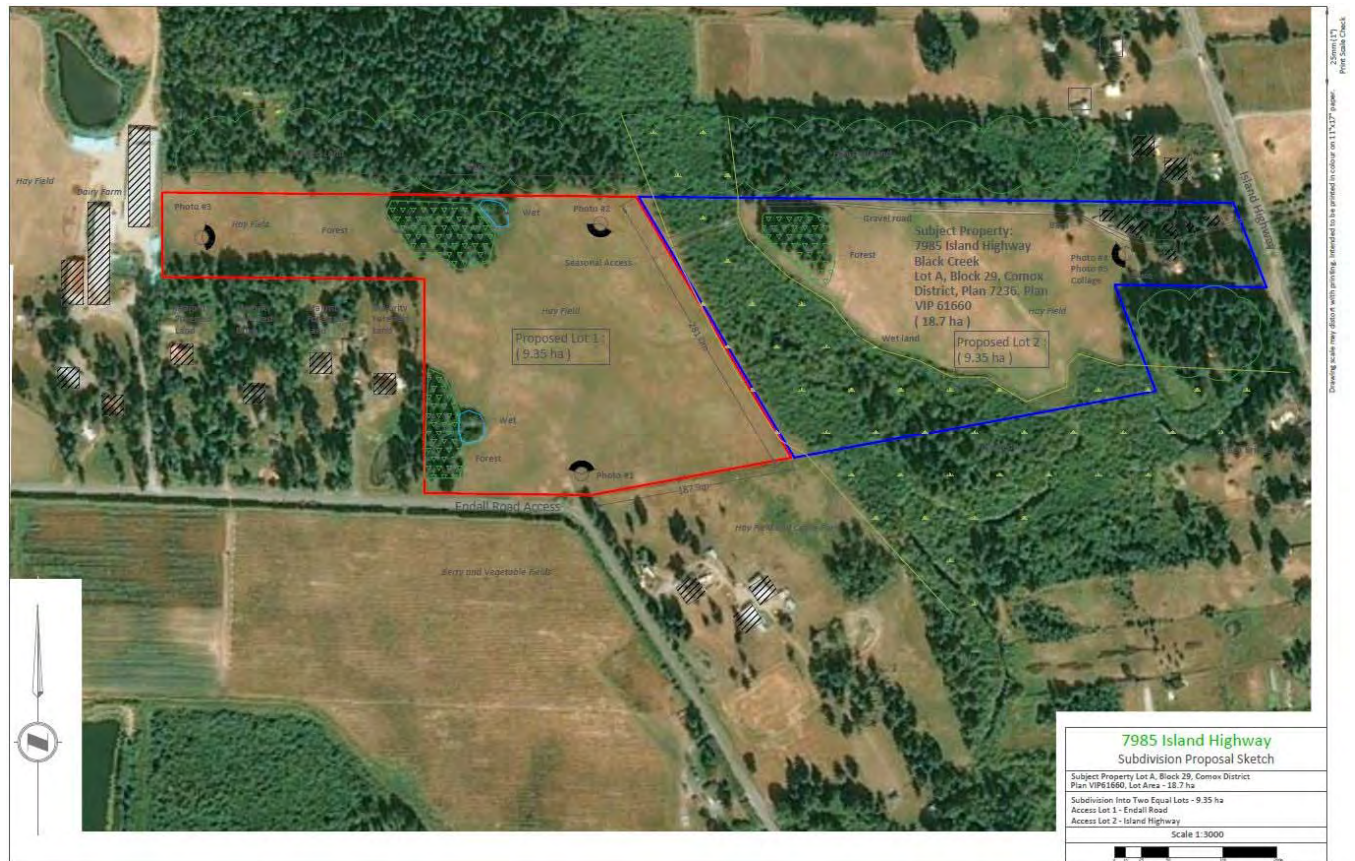


Figure 4: Proposed Subdivision Plan on Air Photo

3110-20/ALR 1C 20

# Provincial Agricultural Land Commission - Applicant Submission

**Application ID:** 60057

**Application Status:** Under LG Review

**Applicant:** Gerard Peeters , Marilyn Peeters

**Agent:** Amy Peeters

**Local Government:** Comox Valley Regional District

**Local Government Date of Receipt:** 06/01/2020

**ALC Date of Receipt:** This application has not been submitted to ALC yet.

**Proposal Type:** Subdivision

**Proposal:** The purpose of the proposal is to separate the property into two parcels along its natural division of the Ployart Creek. This will keep the agricultural potential for the front portion of the property at its current potential (hay crop) and increase the agricultural potential for the back portion of the property.

## Agent Information

**Agent:** Amy Peeters

**Mailing Address:**

8868 Henderson Ave  
Black Creek, BC  
V9J 1A6  
Canada

## Parcel Information

### Parcel(s) Under Application

1. **Ownership Type:** Fee Simple

**Parcel Identifier:** 023-153-776

**Legal Description:** L A BK 29 COMOX PL VIP61660

**Parcel Area:** 18.7 ha

**Civic Address:** 7985 Island Hwy N Black Creek V9J 1G9

**Date of Purchase:** 06/29/1987

**Farm Classification:** Yes

**Owners**

1. **Name:** Gerard Peeters

**Address:**

7985 Island Hwy N  
Black Creek, BC  
V9J 1G9  
Canada

2. **Name:** Marilyn Peeters

**Applicant:** Gerard Peeters , Marilyn Peeters

**Address:**  
 7985 Island Hwy N  
 Black Creek, BC  
 V9J 1G9  
 Canada

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## **Current Use of Parcels Under Application**

### **1. Quantify and describe in detail all agriculture that currently takes place on the parcel(s).**

*The property is physically divided into two distinct portions (hereby referred to as the front portion and the back portion) by the Ployart Creek. Both the front portion (accessed by Island Highway) and the back portion (accessed by Endall Rd and seasonally by a bridge across Ployart Creek) are used 100% for hay. In 2019, the front portion produced 23.5 tonnes (metric) of hay and the back portion produced 39 tonnes of hay.*

### **2. Quantify and describe in detail all agricultural improvements made to the parcel(s).**

*In 1999 The current owners cleared the back portion of standing timber with two plots of timber left in place (standing timber total area 0.7 ha). The cleared back portion was planted with hay seed. Drainage was improved during clearing by sloping land and perforated pipe was installed to drain wet depressions.*

*During periods of heavy rainfall in winter, the front portion of the property frequently floods almost entirely with depths approaching 6 ft of water on the south side. This cuts off access to the back portion and can remain flooded for several weeks at a time. There is a small seasonal access way that often remains wet or flooded, even without heavy rainfall; this restricts access from the back portion to the bridge. When the seasonal access way is flooded, vehicle access is not possible. This seasonal access way was constructed back when the original owners of the property first developed the land.*

*Improvements to reduce flooding are unable to be made as directed the Department of Fisheries and Oceans, as the Ployart Creek which runs through the property connects to the Black Creek which drains to the east along the southern edge. Both creeks are fish bearing. With the increased frequency and higher intensity storm events, peak storms such as the Q20 (20 year), or Q100 (100 year) storm events are becoming more common due to climate change, access is expected to be severely reduced in the long term. Increased flooding periods and higher water depths is expected to be more frequent.*

*The front portion is also bordered by a riparian zone, so the owners are unable to redirect water into this area.*

*The property has three barns installed on the front portion for farm equipment / hay storage.*

*The portion of the front field that is usable for hay has been fenced.*

*The property is annually fertilized to increase hay potential in the summer months.*

### **3. Quantify and describe all non-agricultural uses that currently take place on the parcel(s).**

*The home is situated on approximately 0.7 ha of lawn and large second growth Douglas Fir timber. There are 3 detached garages used for storage, vehicles, and a small art studio.*

*Approximately 3.6 ha in the front portion are wetland / creeks and fenced off with no access.*

## Adjacent Land Uses

### North

**Land Use Type:** Unused

**Specify Activity:** Forested Land, not developed

### East

**Land Use Type:** Agricultural/Farm

**Specify Activity:** Neighboring lots separated by the Island Highway, lots used for hay development, or standing timber

### South

**Land Use Type:** Agricultural/Farm

**Specify Activity:** Hay fields and cattle farm, Berry and vegetable fields for Coastal Black Estate Winery

### West

**Land Use Type:** Agricultural/Farm

**Specify Activity:** Dairy farm, smaller lots with single family homes that are majority forested land.

## Proposal

### 1. Enter the total number of lots proposed for your property.

9.3 ha

9.4 ha

### 2. What is the purpose of the proposal?

*The purpose of the proposal is to separate the property into two parcels along its natural division of the Ployart Creek. This will keep the agricultural potential for the front portion of the property at its current potential (hay crop) and increase the agricultural potential for the back portion of the property.*

### 3. Why do you believe this parcel is suitable for subdivision?

*This parcel is suitable for subdivision as the existing uses, accessibility, and physical configuration all support the proposed subdivision.*

*The back portion of the property is accessed by Endall Road, with over 156m of road front access. It is well-draining, fertile land suitable for a variety of purposes such as raising livestock and growing a variety of crops and has been rated as 5 (P,M) 3 (M) by the Canada Land Inventory.*

*The front portion of the property is accessed by Island Hwy and has been rated as 5 (P,M) 3 (M) by the Canada Land Inventory.*

*Access to the back portion of the property is seasonally restricted in physical access from the front portion due to flooding. There is also no clear line of site from the front portion to the back portion due to the brush / standing timber in the riparian zone along the Ployart Creek.*

*In the current lot configuration, the agricultural potential of the back portion is currently underutilized. No machinery, equipment, barns or anything of value can be stored in the back portion of the property, due to risk of theft or damage, as the property is easily accessed and completely viewable from Endall Rd. In its present configuration as one parcel, no livestock can be kept on the back portion, as the owners would be unable to keep a close eye on the animals, thus leading to a higher potential of liability due to a slower response time to loose animals. Due to no line of sight, loose animals would be found during scheduled feeding times, or reports from neighbors. Care for the animals in the winter months would*

**Applicant:** Gerard Peeters , Marilyn Peeters



require a 1.9km drive from the home at 7985 Island Highway around to Endall Road. Additionally, driving a tractor, or a tractor and wide implements from the front portion along the Island Highway and Endall Rd to the back portion represents a danger to both the farmer and to drivers. Just north of the property, the Island Highway speed increases from 60km/hr to 80km/hr, the 60km/hr zone is for approx. 2.5km. Speeding in this area is very common, and the Island Highway is a two lane road. Impatient drivers in either direction may attempt to pass a tractor unsafely, and this poses a very real risk for an accident.

By subdividing, a home could be placed on the Endall Road property and the agricultural capability of the property would be greatly increased. With a size of approx. 9.3ha, this property would not be attractive as a "hobby farm", but would have very real potential for any number of agricultural activities to be pursued. Endall Road is frequently accessed by guests attending functions and activities at Coastal Black Estate Winery. A farm stand along Endall Rd could be a profitable endeavor, but could only be pursued by having a home on the property with owners to regularly stock and monitor a farm stand.

Due to the recent Covid-19 pandemic, local produce and meat sales are in higher demand as reliance on international products or inter province trade can be severed by the extreme measures needed to protect communities during Provincial quarantines or emergencies. Reliance on outside source manufactures, or producers is strained due to political, or physical constraints. Having more access to food grown in a community can help stem these issues; with this subdivision there would be a greater potential to help our community and ease worries about sourcing fresh reliable food.

#### **4. Does the proposal support agriculture in the short or long term? Please explain.**

*Both.*

*Short term:*

*The property in its current formation contributes to agriculture, but only with a very basic crop. Subdivision would increase the agricultural potential of proposed lot 1 immensely. The owner intends to sell the back portion of the property to their son and daughter in law. Both are long standing members of the community, have lived on farms, and have knowledge and experience raising livestock. They intend to build a modest sized home so as to minimally detract from the agricultural footprint. Short term plans are to increase agricultural production by fencing and cross fencing, raising livestock such as beef cows and chickens (both meat and egg birds), and continuing with hay production. This proposal would not adversely affect surrounding agricultural operations or create conflict. Surrounding neighbors currently raise cattle, have small hobby farms, or produce hay. Directly across from the property on Endall Road is Coastal Black Estate Winery, which is both a working farm and a community attraction.*

*Long term:*

*The proposed subdivision of 9.3 ha meets minimum lot requirement for RU-ALR be the local government (8 ha). There would be no risk or possibility of future subdivision applications, therefore no risk of loss of currently productive agricultural land. If this land was to ever be offered for sale in the future, the size of the parcel at 9.3 ha would be unattractive for those buyers looking for a hobby farm or an estate and would only be enticing to those looking to actively farm.*

#### **5. Are you applying for subdivision pursuant to the ALC Homesite Severance Policy? If yes, please submit proof of property ownership prior to December 21, 1972 and proof of continued occupancy in the "Upload Attachments" section.**

*No*

## **Applicant Attachments**

**Applicant:** Gerard Peeters , Marilyn Peeters

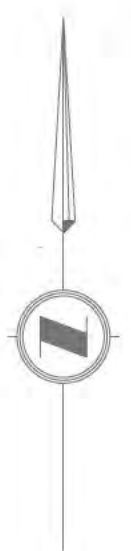
- Agent Agreement - Amy Peeters
- Proposal Sketch - 60057
- Site Photo - 7985 Island Highway Photos
- Certificate of Title - 023-153-776

## **ALC Attachments**

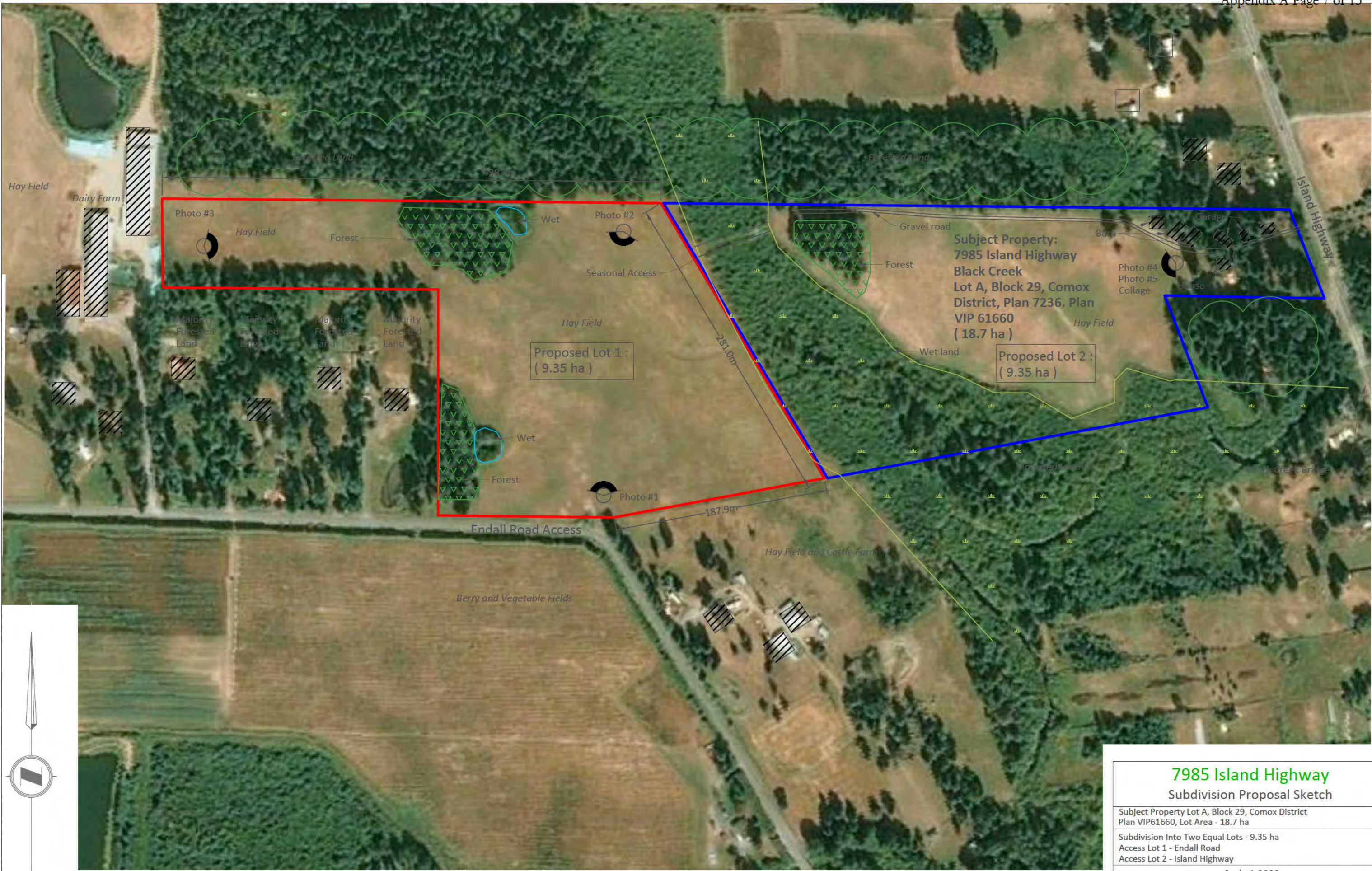
None.

## **Decisions**

None.







<b>7985 Island Highway</b> <b>Subdivision Proposal Sketch</b>
Subject Property Lot A, Block 29, Comox District Plan VIP61660, Lot Area - 18.7 ha
Subdivision Into Two Equal Lots - 9.35 ha Access Lot 1 - Endall Road Access Lot 2 - Island Highway
Scale 1:3000





Photo 1 Proposed Lot 1 Facing North (South End Of Lot Directly off Endall Road Access)



Photo 2 Proposed Lot 1 Facing South (North East Corner of Lot)





Photo 3 Posposed Lot 3 Facing East (Northwest Corner of Lot)



Photo 4 Proposed Lot 2 - Facing West





Photo 5.01 Nov 17 2009 Proposed Lot 2 - Facing West



Photo 5.02 Jan 16 2010 Proposed Lot 2 - Facing West



Photo 5.03 Oct 26 2010 Proposed Lot 2 - Facing West



Photo 5.04 Dec 30 2010 Proposed Lot 2 - Facing West





Photo 5.05 Mar 3 2012 Proposed Lot 2 - Facing West



Photo 5.06 Oct 23 2014 Proposed Lot 2 - Facing West



Photo 5.07 Dec 14 2015 Proposed Lot 2 - Facing West



Photo 5.08 Dec 15 2015 Proposed Lot 2 - Facing West



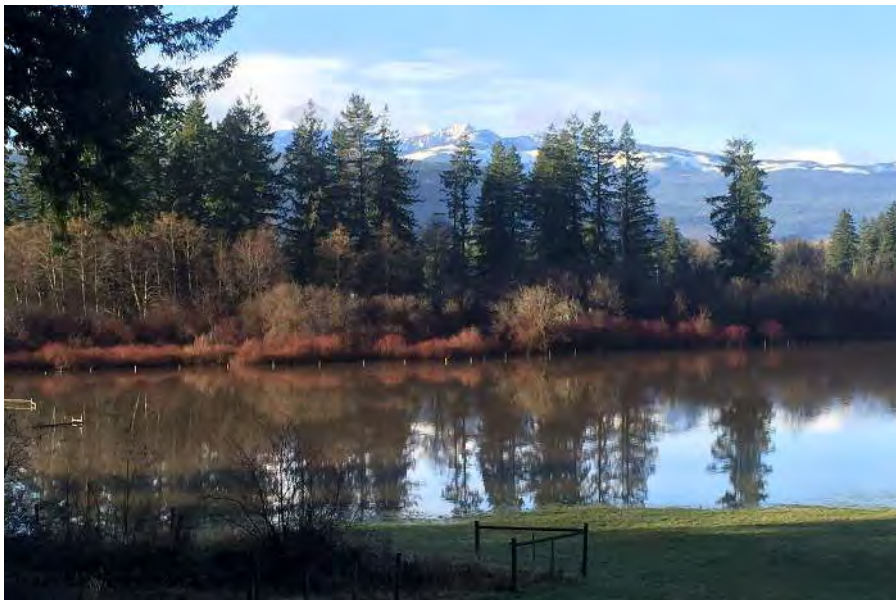


Photo 5.09 Jan 28 2016 Proposed Lot 2 - Facing West



Photo 5.10 Oct 18 2016 Proposed Lot 2 - Facing West



Photo 5.11 Nov 4 2016 Proposed Lot 2 - Facing West



Photo 5.12 Jan 20 2017 Proposed Lot 2 - Facing West



Photo 5.13 Feb 17 2017 Proposed Lot 2 - Facing West



Photo 5.14 Nov 27 2017 Proposed Lot 2 - Facing West

3110-20/ALR 1C 20

July 31, 2020

Brian Chow  
Rural Planner, Planning and Development Services Branch  
Comox Valley Regional District

**Sent by email**

Dear Brian Chow:

**Re: Agricultural Land Reserve (ALR) Subdivision Application at 7985 Island Highway North (Gerard and Marilyn Peeters)**

Thank you for providing the opportunity for the Ministry of Agriculture (the 'Ministry') to provide comments on the above noted ALR subdivision application. From an agricultural perspective, the Ministry offers the following comments:

- The Ministry recognizes that the eastern portion of the property regularly experiences flooding which restricts direct access to the western portion of the property as the seasonal access road which connects both portions of the property is often flooded. As a result, the landowner is forced to take a circuitous route approximately 1.9 km in distance in order to access the western portion of the property.
- The Ministry notes that it is not uncommon for farm operations in both the Comox Valley and throughout B.C. to be comprised of many parcels that are often separated by large distances; in many cases in excess of 1.9 km.
- Farm operations in both the Comox Valley and throughout B.C. that are situated in lowland areas near creeks and streams often experience periodic flooding during high water flow and rainfall events. Normally these flood events occur outside of the growing season.
- Subdividing the property would result in further fragmentation of the ALR with the creation of a new lot. Further, subdivision and the creation of smaller lots may erode the long term agricultural and economic potential of the property which in turn, may increase land cost per hectare which limits future farm business opportunities.
- Most of the soils on property are within the prime, improved classes 1-3 agricultural capability rating. The soil deficiencies are consistent with the Black Creek area; high seasonal water table with undesirable soil structure and adverse climate considerations related to the proximity of the Ployart creek. These conditions do not limit the production of high quality forage crops for livestock operations.
- From viewing aerial photography of the Black Creek region, it is evident that both Ployart Creek and Black Creek bisect numerous parcels within the ALR, many that are actively farmed. Although a natural feature that divides a property such as a creek or ravine often makes a convenient boundary to subdivide a



property, the mere presence of such a feature is often not a valid justification for subdivision.

- The Ministry notes that there appears to be an active farm operation adjacent to the property to the west. As opposed to pursuing a two lot subdivision, the landowner may wish to pursue the feasibility of a lot line adjustment between their property and the property that houses the farm operation. This potential lot line adjustment could serve numerous purposes including:
  - Relieve the landowner of the responsibility and challenges associated with owning/farming the western portion of the property;
  - Generate revenue for the landowner; and
  - Increase the amount of forage land available to the farm operator.
- A potential lot line adjustment, however, would not enable the landowner to sell the western portion of the property to their son and daughter in-law and therefore, may not represent an appealing option to the landowner.
- A further option, if it becomes available in the future, could be for the landowner and their family to purchase one of the smaller, rural residential lots along Endall road (identified as lots A, B, C and D on Figure 1: Subject Property Map) adjacent to the western portion of the property and pursue a lot line adjustment with proposed lot 1 (the western portion) of the subject parcel.

Please contact Ministry staff if you have any questions regarding the above comments.

Thank you for the opportunity to provide comments from an agricultural perspective with respect to this ALR subdivision application.

Sincerely,



Reed Bailey, Land Use Planner  
B.C. Ministry of Agriculture  
Phone: (778) 698-3455  
Email: [reed.bailey@gov.bc.ca](mailto:reed.bailey@gov.bc.ca)



Jill Hatfield, P.Ag., Regional Agrologist  
B.C. Ministry of Agriculture – Courtenay  
Office: (250) 897-7518  
E-mail: [jill.hatfield@gov.bc.ca](mailto:jill.hatfield@gov.bc.ca)

Cc: ALC Island Land Use Planners ([ALC.Island@gov.bc.ca](mailto:ALC.Island@gov.bc.ca))