

To: Mr. Brian Chow, Rural Planner CVRD, Regional Directors – Edwin Grieve, Arzeena Amir, Daniel Arbour

From: Dan and Patti Charles, 8710 Paulsen Rd, Black Creek, B.C. V9J-1J8

Re: Bylaw 593 “Rural Comox Valley Zoning Bylaw No. 520, 2019, Amendment No. 1 (File 3360-20/RZ 5C 18)

We live on Paulsen Rd, our lot is adjacent to the property referenced in Bylaw#593 on Wilfred Rd. We have a number of concerns about the proposed bylaw.

When we purchased our lot in 1993 it was with the understanding that the adjacent lot could only have a maximum of 2 houses. Being Zoned RU-8, the lot could not be subdivided due to the size so we should have no concerns about that becoming an issue. This proposal changes that density from a maximum of 2 houses to the possibility of 6 more families living in the neighborhood (each lot would be able to build a house plus one carriage house) and a road built adjacent to our property.

The Unger property was clear cut about 15? years ago. It is now completely covered with deciduous and small coniferous trees and is acting as a sponge for excess water events. Anyone who develops the lot will likely remove and disturb the current landscape. This would allow excess runoff from rain and snow along with all of the associated sediment to flood the Saratoga Wetlands. There is a water course that runs thru the middle of the property with current SPEA of 5m on each side making two of the proposed 3 lots difficult to develop without affecting the wetlands. Environmentally, this property is too wet and it’s proximity to a sensitive wetland make it a poor candidate for increased density. The current RU-8 zoning makes sense. ( I would also like to point out that the “Voluntary Community Amenity Contribution” and Statutory Right of Way the CVRD negotiated is almost completely in the 21.3m SPEA of the northern watercourse and would be un-available for development anyway).

The regional water system supply is in a critical supply situation in the dry summer months. GW solutions was hired to study the water situation in Sept/2015 and the staff report generated in regards to their findings on Nov. 13/15 (File 5620-02) confirmed the in-ability of the current system to supply community needs of 2000m<sup>3</sup>/day during the summer. I confirmed with CVRD engineering dept. that this has not improved.

The following text is from CVRD Staff Report dated May 24, 2019 from Marc Rutten (file 5600-03/BCOB)....

“Over the past several years the river infiltration gallery has proved unreliable, with 2014, 2015 and 2016 being particularly bad years. The CVRD has had to adapt operation of the water resources in the Park, relying much more on the ground water wells during the summer than was originally intended. With summer drought conditions only predicted to worsen, additional groundwater capacity is required to ensure the water service’s ability to meet summertime demand.”

The report goes onto say that if all of the existing Oyster river water licenses were maxed out the river would run dry in the summer. The CVRD concluded from this report that additional water licenses from the Oyster are unlikely. So the information on the water system capacity was available Nov, 2015 and re-enforced again as of May 24/19. The CVRD has determined the current water supply cannot meet CURRENT demand in the summer let alone any new connections. **For this reason alone this bylaw should not have gone thru to this level (could have been stopped Dec.9/19 where 1<sup>st</sup> and 2<sup>nd</sup> readings were passed) and should not be passed now.** I think it is important to bring to your attention that the CVRD staff refer to VIHA with regards to area water capacity. I confirmed with CVRD engineering that VIHA is responsible for the quality not the quantity. They are not the “external agency” for information of water system capacity.

We would also like to make a short mention of the process of re-zoning. This particular application was started in Sept/2018. The CVRD and applicants had over 18 months to consider this proposal. The general public and local residents were only given 10 days notice that their neighborhood was about to be changed and (in this case) their water supply possibly compromised. Is this fair? I think not!

In conclusion, we are STRONGLY against the proposal to allow increased density at this location.

Sincerely

Dan and Patti Charles  
8710 Paulsen Rd, Black Creek, B.C. V9j-1J8