
From: Bonnie Kozlowski
Sent: Friday, May 24, 2019 7:26 AM
To: Ton Trieu; Sylvia Stephens
Subject: FW: The proposed bylaw to prohibit water bottling in all zones should definitely be implemented. With water restrictions so prevalent, it makes no sense to allow a water bottling facility.

6410-01 / PJ 4CV 15

Bonnie Kozlowski
Branch Assistant - Corporate Services
Comox Valley Regional District
Tel: 250-334-6057

From: victoria sorensen [mailto:_____]_____
Sent: May 24, 2019 5:09 AM
To: zoningreview <zoningreview@comoxvalleyrd.ca>
Subject: The proposed bylaw to prohibit water bottling in all zones should definitely be implemented. With water restrictions so prevalent, it makes no sense to allow a water bottling facility.

From: diana schroeder <>
Sent: Tuesday, July 09, 2019 7:40 PM
To: Ton Trieu
Cc: Sylvia Stephens
Subject: Re: Form submission from: Comox Valley Regional District - Planning & Development Services (2)
Attachments: image006.jpg

6410-01 / PJ 4CV 15

Thank you you for your response. I'm sorry, I found out that the Airbnbs problem will be dealt with at a later date and realize that in a rural area, they do not present the same problems as they do in an urban neighbourhood. I hope you will find my questions and suggestions regarding tiny homes more pertinent.

Sincerely,
Diana Schroeder

On Thu, Jul 4, 2019 at 4:40 PM Ton Trieu <ttrieu@comoxvalleyrd.ca> wrote:

Hi Diana,

Thank you for your email. Please note that the CVRD Zoning Bylaw are only applicable in the electoral areas A, B and C. Short-term vacation rentals are only permitted in Tourist Commercial zones and not permitted in residential zones. In 2020, the planning department is planning a comprehensive review on vacation rental in the regional district. Please contact the City of Courtenay in regards to land use regulations and if they are planning to review vacation rental use. The CVRD and surrounding municipalities are planning to investigate housing needs in the Comox Valley. We are hoping to use the findings from the housing needs and somehow connect it to the short-term vacation rental review.

Thank you,

Ton

Ton Trieu, MCIP, RPP
Manager of Planning Services

Planning and Development Services Branch

Comox Valley Regional District
600 Comox Road, Courtenay, BC V9N 3P6
Phone 250-334-6021 Fax 250-334-8156
Toll free: 1-800-331-6007



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

This is a duplicate of a message I already sent but I am not at all sure it went to the right address. Here is the text of the original message.

When I moved here 10 years ago, the house next to me was a vacation rental and was rented on a monthly basis. I had no problem with that but it has now become an Airbnb with no full-time resident. That means that people are booking daily and weekly accommodations which means a constant stream of tourists next door, and an increase in traffic. I expect tourists to enjoy their holidays, barbecue and party but now I have to listen to it every night. I no longer have the peace and quiet that I thought a residential neighbourhood would ensure. I also do not have the safety and security of a neighbour who actually sleeps there, a neighbour I can talk to, a neighbour who can borrow a cup of sugar, etc. What's worse is that with an absentee landlord, policing of the house next door, falls to me. I am the one who has to listen to the dog barking, every word of every

drunken conversation, loud music, etc. I either have to put up with it or make a call. It's annoying that while my neighbour is allowed to run a business in a residential neighborhood, she profits at my expense.

I don't understand why the zoning regulations do not apply to Airbnbs which are, in fact, a business but do not require the owner to be in residence or to undergo inspections or licensing.

In fact, the Airbnb trend is making a mockery of Courtenay's attempt to ease the housing crisis by providing tax incentives for infill to increase density in the downtown core. Home builders and home owners are taking advantage of this by creating additional units and then renting them as Airbnbs. This will not improve the availability of rental accommodations and only serves as an incentive to encroachment by business into our residential neighborhoods. Businesses which have no licenses or permits and which are outside the zoning regulations shouldn't be permitted anywhere, especially on land that is designated single family residential.

To me the solution is rather easy. Airbnbs should have to adhere to the same bylaw as a bed and breakfasts or to the bylaw regulating vacation rentals. Existing Airbnbs could be grandfathered but preferably they would have to upgrade their status.

I am concerned not only for myself but for our sense of community well-being. In Europe, major cities have become tourist ghettos as a result of Airbnbs. Airbnbs move in and the residents move out. We need to build community and our residential neighborhoods, not destroy them.

I have another concern, maybe it's a question. Recently, I was contacted by a friend with a lovely, tiny home who is looking for a place to park her house. The restrictions on residences in the ALR preclude that possibility but there must be acreages that could accommodate a tiny home - especially if they allowed composting toilets. If not, sewer or septic would be required. Water would also be a necessity. I see a small community of tiny homes as a viable option to our housing crisis. I hope this type of accommodation will be considered when discussing zoning amendments. I would also hope that the CVRD might find some available land to help create a tiny home community. I hear there is a court ordered sale of cleared but not developed land on Arden Road. Could this be a possibility?

Thank you for reading this long winded email and I hope you will consider the concerns I have brought forward. Quality of life is important. We cannot stop our population from increasing but we can direct the type of growth we want. Nobody should have to sacrifice their neighborhood security for the sake of private business - especially when it is essentially a black market business with no restrictions.

Thanks for your consideration,

From: Ton Trieu
Sent: Thursday, May 23, 2019 2:08 PM
To: 'Bill Wilkins'
Cc: Sylvia Stephens
Subject: RE: Rezoning

6410-01 / PJ 4CV 15

Hi Bill,

Thank you for your email. The regional district will proceed in zoning your property to Rural Twenty.

Thank you,
Ton

Ton Trieu, MCIP, RPP
Manager of Planning Services
Planning and Development Services Branch
Comox Valley Regional District
600 Comox Road, Courtenay, BC V9N 3P6
Phone 250-334-6021 Fax 250-334-8156
Toll free: 1-800-331-6007



From: Bill Wilkins []
Sent: May 22, 2019 7:32 PM
To: Ton Trieu <ttrieu@comoxvalleyrd.ca>
Subject: Rezoning

Hello Ton

My name is William Wilkins. I have property at 3639 Burns RD. I would like to add a second residence, therefore i am in full agreement with the Regional Districts decision to rezone my property from Rural ALR to Rural 20. Thank you

From: Ton Trieu
Sent: Thursday, May 23, 2019 2:35 PM
To: 'Joan Boase'
Cc: Sylvia Stephens
Subject: RE: water bottling bylaw

6410-01 / PJ 4CV 15

Thank you for your email. Your email will be recorded.

Thank you,
Ton

Ton Trieu, MCIP, RPP
Manager of Planning Services
Planning and Development Services Branch
Comox Valley Regional District
600 Comox Road, Courtenay, BC V9N 3P6
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From: Joan Boase [_____] [View details](#)
Sent: May 23, 2019 10:48 AM
To: zoningreview <zoningreview@comoxvalleyrd.ca>
Subject: water bottling bylaw

I wish to inform you that my family strongly supports a ban on the bottling and sale of water, in all zones.

Thank you Joan Price Boase PhD

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From: Ton Trieu
Sent: Thursday, June 13, 2019 2:46 PM
To: 'PHIL MASINI'
Cc: Sylvia Stephens
Subject: RE: Water extraction and sale

6410-01 / PJ 4CV 15

Hi Phil,

Thank you for your email. I will document your correspondence and relay your message to the electoral area directors. Note that the draft zoning bylaw will be prohibiting water bottling facility in all zones.

Thank you,
Ton

Ton Trieu, MCIP, RPP
Manager of Planning Services
Planning and Development Services Branch
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Toll free: 1-800-331-6007



From: PHIL MASINI [[link\]](#)
Sent: June 12, 2019 7:09 PM
To: zoningreview <zoningreview@comoxvalleyrd.ca>
Subject: Water extraction and sale

Good Day Ladies and Gentlemen,

I am writing to express my opposition to the extraction, bottling, and sale of groundwater from the aquifer that provides this area with water that we all need to live. I have a broader concern for the future of water availability in general. It is well known that the water table is getting lower globally, especially in areas where water demand is high. We have companies like Nestles who are well known for drawing very large amounts of water for sale and leaving the local communities having to buy water.

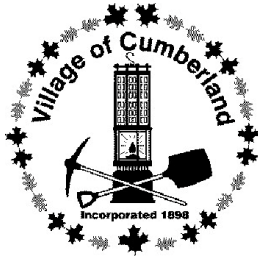
I also have a more local concern for the water license that has already been issued on Sackville Road in Merville. A drilled well was allowed to operate several years ago in the immediate vicinity of the property which holds the license that is the subject of the controversy, with the result that the resident next door was left with a well run dry. If this operation is allowed to proceed there is no reason to suppose that the result will be any different, with a high probability that several shallow wells in the neighbourhood will run dry.

I live at the intersection of Coleman Road and North Island Highway so I too depend on this aquifer. I act as property manager for the land directly across the street from the lot with the license. That home is currently occupied by my daughter, a single mother with two children. She keeps chickens and household pets, and she has several horses. Like everyone else, she must have water. Her well is approximately 210 metres from the subject well on Mr. Mackenzies' property. If he is allowed to proceed with his plan, she will very likely be in dire straits.

We were told at one of the recent public gatherings that the appropriate government agency responsible for this issue was unaware of any wells in the neighbourhood because they are not registered. I can state that there is a well on every property in that area, registered or not, drilled or dug.

I entreat you, please act to stop the issuance of licences for the purpose of extracting groundwater for profit, and further, to prohibit the bottling or the bulk export of same to any other community or jurisdiction. I thank you for your attention.

Sincerely,
Phil Masini



Corporation of the Village of Cumberland

2673 Dunsmuir Avenue
P.O. Box 340
Cumberland, BC V0R 1S0
Telephone: 250-336-2291
Fax: 250-336-2321
cumberland.ca

August 21, 2019

Ton Trieu
Manager of Planning
600 Comox Road
Courtenay, BC V9N 3P6

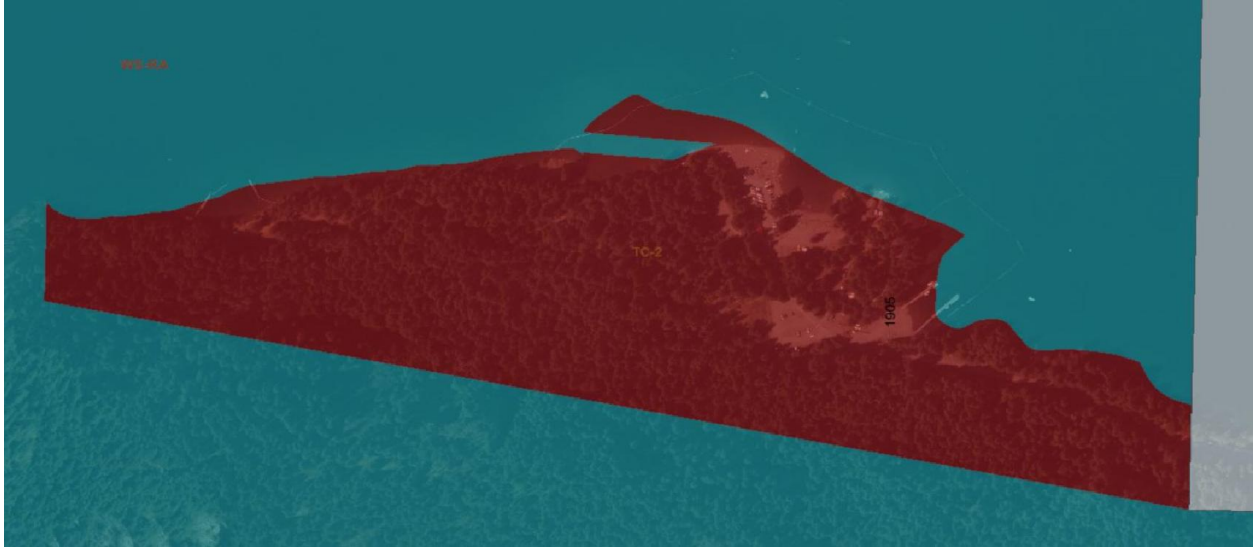
**Re: TC-2 zone boundaries at Cumberland's Lake Park, Public Hearing of Bylaw no. 520, 2019
scheduled for August 28, 2019**

Dear Mr. Trieu,

For both the CVRD's and our records, the Village wishes to provide a correction to the CVRD's response to the Village's referral comment on Zoning Bylaw No. 520, 2019. The CVRD's response stated that:

"Based on the discussion with our Geographic Information Services (GIS) department, the TC-2 zoning polygon follows the legal property line for the Comox Lake Park, which is the land only and does not include any lake surface. To expand the TC-2 zone outside the legal property boundary, the Village of Cumberland needs to receive approval from the Province (Licence of Occupation) to place infrastructure on aquatic Crown land. A zoning amendment application would then be required to rezone the portion of the surface of the lake to TC-2 to include current and future infrastructure..."

For clarity, and as confirmed with CVRD GIS staff and discussed by phone with the Village Senior Planner, the current TC-2 zone does not correspond to the natural boundaries of the land. It also excludes a portion of the picnic area above the high water mark at the campground. In addition, the TC-2 zone includes portions of the water, such as the western portion of the bay and one of the docks. The TC-2 zone excludes the majority of the swimming area. See the map below, captured from the CVRD's on-line iMap program.



CVRD iMap showing TC-2 zone relative to Lake Park (2018 air photo)

As per the July 8, 2019 Village Council resolution, the Village repeats that the TC-2 zone boundaries be updated to be consistent with what exists on the ground and on the surface of the water which was the intent of the 1937 legal description when the Village acquired the area for the purposes of “a park and pleasure ground” from Canadian Western Lumber Company. That is, the updated zone should encompass the infrastructure works of Lake Park including the dock and marine use areas and the log booms that delineate the two swimming areas (the water area off the public beach as well as the water area at the group campsite).

The Village acknowledges that a licence of occupation from the Province for the recreational infrastructure on the water will be sought by staff.

We look forward to working with the CVRD on amendments to the zoning bylaw to reflect the actual use as the water levels have changed significantly since 1937.

Sincerely,

Ken Rogers
Manager of Development Services

Karin Albert
Senior Planner

cc. Council Reader

From: >

Date: Monday, Aug 19, 2019, 12:10 PM

To: Russell Dyson <rdyson@comoxvalleyrd.ca>

Subject: comprehensive zoning bylaw review 520

Greetings Mr. Dyson,

Please add our correspondence to the public comments.

As a water licensee, we strongly oppose the prohibition of water and beverage bottling facilities in the RD. Our proposal is supported by eight key objectives in the official community plan which has been ratified.

17(1) To encourage stewardship of the land while encouraging sustainable economic development based on the regions natural resources.

17(3) To promote and strengthen the long-term viability of renewable resource based uses in the Comox Valley.

17(13) To ensure a continued supply of land that is maintained for industrial use and to encourage the retention of existing industrial uses.

18(6) Through partnerships, explore options and mechanisms that improve access to potable water, or where feasible, reclaimed water, at a reasonable price available to the agriculture and aquaculture industries.

39(3) Permit new industrial uses through temporary use permits where it can be demonstrated that the proposed industrial use will not result in additional pressure on local servicing and infrastructure.

42(7) To direct new commercial and industrial and institutional uses requiring public servicing into the settlement nodes.

(47)1 Consider zoning amendments and temporary use permits for industrial uses such as heavy and light industrial, agriculture and aquaculture, and rural resource activities throughout the rural settlement areas.

73(20) Through partnerships, support initiatives for water collection, storage and distribution and re-use to meet the domestic needs for potable water.

We are zoned RU8 and for home industrial occupation. Under the existing bylaws, water and beverage bottling is not a prohibited use as a home industrial occupation.

Water and beverage bottling is a light industrial activity according to the current land use planning.

We are in the settlement node where other heavier industrial activities are undertaken by my neighbours.

There are three other water bottling companies operating inside the CVRD boundaries.

The CVRD as a corporation, before our right to be heard, acted willfully to hinder us in secret which is an offence under the Water Sustainability Act.

Our license was upheld by the Environmental Appeal Tribunal on its merit.

The CVRD has made a decision denying us our rights that was not based on the application presented to them.

These matters are before the Legislature and our original application is still instream.

Any changes in new zoning bylaw that affect our rights will be subject to challenge.

The previous actions of CVRD Directors and Appointed Officials that willfully called on the general public to oppose us be subject to discipline.

We respectfully request that the CVRD Administration and Board of Directors reconsider their position and adhere to the Official Community Plan.

Sincerely,
Christopher MacKenzie and Regula Heynck

Courtenay, BC V9N 3P6
Fax: 250-334-4358
250-334-6007
comoxvalleyrd.ca



personal information contained on this form is collected under the authority of section 26(e) of the *Freedom of Information and Protection of Privacy Act* and will be used for the purposes of planning and evaluating a program or activity of the Comox Valley Regional District. The information provided will become a matter of public record and may be published online. Inquiries about the collection, use and disclosure of this information can be made at the Planning and Development Services Branch at 600 Comox Road, Courtenay, BC 250-334-6000 or by email at planningdevelopment@comoxvalleyrd.ca.

Date: August 27, 2019

To: Comox Valley Regional District

From: (Optional)

Name (Please print): Wayne Leakey

Street Address: 1532 Highridge Dr. Comox

Tel/Email: - - - - -

Re: Bylaw No. 520

My comments/concerns are:

- ☐ I do support this bylaw.
☐ I do support this bylaw, subject to the conditions listed below.
☒ I do not support this bylaw.

Comox Valley Regional District

RECEIVED

File: 6410-01/PJ4CV15

AUG 28 2019

To: Leg. Serv.

cc: T. Trien

e 9:38am

ST

See attached comments.

August 27, 2019

Comox Valley Regional District
Planning and Development Services Branch
600 Comox Rd
Courtenay BC V9N 3P6

RE: Bylaw No. 520,2019

Comox Valley Zoning By-Law 520, 2019 should consider reinstating the former CR-1 Zoning, as a viable re-zoning option in the land development process. This rural zone provided 1, 2, and 5 acre desirable country living acreages.

By-Law No.200, Comox Valley Zoning By-Law, 2005, amendment No. 54 along with By-Law 208, Rural Comox Valley O.C.P Bylaw 1998 amendment No. 44 were established hastily. When the above two bylaws were adopted, the O.C.P and Zoning bylaws were to be consistent with minimum lot area requirements for subdivisions in settlement expansion areas and new development, pursuant to the Comox Valley Regional Growth Strategy By-Law 120, 2010.

The remaining CR-1 Zoned properties are carrying on well, and a revitalized re-zoning as mentioned above would serve future rural country living well.

Thank you,

Wayne Leakey

A handwritten signature in black ink, appearing to read 'Wayne Leakey', with a stylized, flowing script.

Roy Leakey

A handwritten signature in blue ink, appearing to read 'Roy Leakey', with a stylized, flowing script.

August 28th, 2019

Alana Mullaly
Comox Valley Regional District
600 Comox Road
Courtenay, BC V9N 3P6

Re: Public Hearing for Rural Comox Valley Zoning Bylaw, No. 520, 2019

Thank you for the opportunity to provide input into proposed Zoning Bylaw No. 520, 2019. We have reviewed the proposed amendments and would like to express our concern with the changes specifically targeted to remove 'Residential Use' from the Upland Resource (UR) and Water Supply and Resource Area (WS-RA) Zones.

Under the current zoning bylaw, 'Residential Use' is permitted outright on any Upland Resource (UR) or Water Supply and Resource Area (WS-RA) zoned property. The proposed zoning amendments will remove 'Residential Use' as an outright Permitted Use and allow it only as an "Accessory Use", subject to evidence/witness of other Permitted Uses being actively performed on the lands.

We believe that adoption of these bylaw amendments will have unforeseen indirect impacts that have not been fully evaluated, the consequences of which will impact the viability of the resource based operations that these changes are intending to preserve. Moreover, the changes create an ambiguous approval system for property owners seeking to construct a residence on their lands.

Approval Framework Unclear

Upon making 'Residential' an Accessory Use, a property owner will need to demonstrate to the CVRD that a principle permitted use is actively being operated on the lands prior to receiving permission to construct a home. However, the proposed bylaw does not provide clear, measurable or objective criteria that distinguishes how the CVRD will determine if or when a Principal Use is being performed on the land, and in turn when an accessory Residential Use is permitted.

For example, is growing trees evidence of Silviculture? If so, how many trees must be growing? How long must they be growing for? Is excavating material on a lot evidence of gravel extraction? Moreover, how long must these activities be operating to qualify for a building permit to construct a residence? If the activity ceases after a home is constructed, is the property now non-conforming? If so, what are the impacts to property owners with houses that are interested in resale of their lands?

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A business unit of TimberWest Forest Corp.
www.couverdon.com

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F 250 716-3782



Without clear measurable criteria, issuance of a building permit to construct a home as an accessory use is completely subjective and at the discretion of Staff interpretation. This subjectivity creates significant confusion for land owners seeking approvals and can lead to disputes between property owners and the Regional District.

Financial Impacts

Amending the Bylaw to make 'Residential Use' Accessory is an indirect form of 'Down-Zoning' and significantly impacts the underlying value of all UR and WS-RA zoned lands in the Regional District. Properties that were previously valued based on their right to construct a home as a Permitted Use will now be assessed lower. Furthermore, securing a residential mortgage against a UR or WS-RA zoned property will become increasingly difficult as financial institutions will be hesitant to lend on a property where 'Residential Use' is only listed as an Accessory Use.

This zoning change directly impacts the financial investments made by owners that have purchased UR or WS-RA zoned lands based on Permitted Uses of the current zoning, and will act as a disincentive for future investment in Resource Lands.

To summarise, we believe the following questions need to be addressed to ensure private landowners do not see their property values decrease and ensure a transparent building permit approval process:

- How many individual parcels of land and owners are in the UR or WS-RA Zone?
- What evidence or measurable criteria must be proven to allow construction of a residence?
- How will CVRD Staff ensure a transparent and clear approval process where interpretations of definitions are subjective?
- How many UR and WS-RA Zoned parcels already have residences constructed?
 - Will these properties become non-conforming if a Permitted Use is no longer occurring on the lands?
 - What impact will this zoning change have on property values?
- How will this change in zoning impact an individual who has purchased with the intent of building based on allowances of current zoning?
- Why is building a home on UR or WS-RA zoned property different than on agricultural land? In both cases, the ability to construct a home should be treated the same.

Couverdon Real Estate

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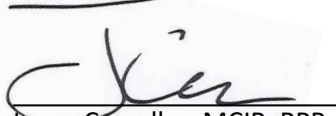
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Couverdon

In light of the impacts described above and unanswered questions impacting property owners of UR and WS-RA zoned lands, we request that the Zoning Bylaw Amendments not be passed and that 'Residential Use' remain an outright permitted use within both the UR and WS-RA zones.

Please feel free to contact the undersigned should you have any questions.

Best Regards,



Jason Carvalho, MCIP, RPP

Manager, Planning

Couverdon Real Estate

Couverdon Real Estate

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www.couverdon.com

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Ton Trieu, MCIP, RPP

Manager of Planning Services Planning and Development Services Branch
Comox Valley Regional District
600 Comox Road, Courtenay, BC
V9N 3P6

August 28, 2019

Re: CVRD Proposed Bylaw 520

Ton,

As discussed during our phone meeting last week, the Private Forest Landowners Association (PFLA) is concerned with several areas of proposed Bylaw 520, 2019 in relationship to the Managed Forest program (BC Assessment Class 7 lands), the issue of paramountcy and the lack of clarity on the interpretation of “silviculture” activities. The PFLA represents over 280 Managed Forest Landowners in BC with several owners located in lands outlined in the bylaw areas.

During a time of pronounced uncertainty in the coastal forest sector, our organization is a strong proponent of having forested landowners bring lands into the Managed Forest Class 7 program for long term forestry management. We appreciate that the Comox Valley Regional District Board of Directors is also interested in maintaining the integrity of resource lands. as outlined in the Comprehensive Rural Zoning Bylaw Review document dated June 29, 2018. We understand the regional growth strategies are implemented partially by an Official Community Plan (OCP) and partially by the proposed updated zoning bylaws. We are aware the OCP policies ‘require immediate implementation to include the need to support resource development in the resources designation zones by permitting residential use as an accessory use only (limited to one sing[l]e detached dwelling)” (Policy 63.2). Unfortunately, our organization cannot support the proposed Bylaw 520 as written.

As forest managers, the definition of silviculture is considered a subset of forestry management that relates to controlling and managing forest growth, health and composition of forests. This generally does not include the harvesting of timber other than for abiotic and biotic impacts: salvage and other forest health effects (spacing, windthrow and diseased tree removal). We are not clear on why proposed Bylaw 520 states silviculture “means all activities related to the development and care of forests, including forestry field training and the removal of harvestable timber stocks, but does



not include the processing of wood or wood products.” Managed forest owners conduct all forestry management activities including silviculture, harvesting timber stocks and processing of wood products. As forest professionals we are concerned about how “silviculture” activities may be out of step with activities inside the managed forest program and be determined for those outside the program (ie. what quality of “development and care of forests, how much timber must be harvested and/or how much field training must occur to constitute adequate “silviculture” levels? And who determines this quantification?).

We would hope that paramountcy should prevail between changes to the UR Zone and Section 21 of the *Private Managed Forest Land Act*, and Section 1(2) of the *Private Managed Forest Land Regulation*. However currently there is concern around the potential conflict regarding dwellings on Section 21(1)(a) of the PMFL Act in relationship to a bylaw that may restrict a permitted “forest management activity”. Section 1(2) of the PMFL Reg defines a “forest management activity” as including “one dwelling per registered parcel unless additional dwellings are permitted under applicable local bylaws”. The proposed amendments to the UR Zone, may restricts “forest management activity” of constructing “one dwelling per registered parcel” by designating a “single detached dwelling” as an “accessory use” of any lot, rather than a “principal use”. We worry that this will erode the managed forest program by causing absentee ownership for those potentially entering or currently in the program and wishing to reside on the property for hands on management of forestry lands.

The PFLA believes proposed bylaw 520 cannot be passed as is as it may create ambiguity in relationship to paramountcy of the PMFLA which includes forestry activities and principal dwellings. As forest managers, are also concerned about interpretation of “silviculture” activities on the outlined lands and the lack of defined process on how these “silviculture” activities will be determined and considered.

We look forward to discussing further at the public hearing on August 28th.

Sincerely,

Megan Hanacek, RPF, RPBio
CEO
Private Forest Landowners Association