



The Best Place on Earth

December 21, 2009

Carol Morfitt  
Manager of Administration  
Comox Valley Regional District  
600 Comox Road  
Courtenay, BC V9N 3P6

Dear Ms. Morfitt;

Thank you for your e-mails sent to the Land Use Coordination Branch detailing the proposed Regional Growth Strategy (RGS) for the Comox Valley Regional District. We have reviewed the draft and have attached to this letter a summary of comments we would like Comox Valley to consider in the further development of the RGS.

I look forward to participating in the Intergovernmental Advisory Committee meetings and discussions as the strategy develops. If you have any questions, please contact me by e-mail, [Genevieve.St.Denis@gov.bc.ca](mailto:Genevieve.St.Denis@gov.bc.ca), or telephone at 250 953-3368.

Sincerely,

Genevieve St. Denis  
Analyst, Land Resource Access  
Land Use Coordination Branch

CC:

Laura Tate  
Growth Strategy Manager – Vancouver Island,  
Ministry of Community and Rural Development

Comox Valley Regional District

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CC:

Urban  
Roycroft / Eclairbut

### Specific Comments on the RGS Draft One

| <b>Section</b>                                    | <b>Comment</b>  |
|---|---|
| Map – Approach to Growth:<br>Compact nodal Growth | It is not clear from this map, or the preceding text, how the zones have been established. <ul style="list-style-type: none"> <li>• Were natural resources (surface and sub-surface such as wind and aggregate) considered?</li> </ul>  |
| Rural Areas                                       | Agree it is important to include the wording on renewable energy infrastructure and facilities in this section <ul style="list-style-type: none"> <li>• Aggregate could also be included</li> </ul>   |
| Housing & Affordability                           | Could add to “locate housing close to existing services” the link to a reduction in GHG emissions due to shorter distances for the transportation of goods and people   |
|   | Agree with encouraging affordable low impact (green) housing  |
|   | Agree with inclusion under “support the creation of senior-friendly communities” transportation efficiency. This could be added to other non-senior specific policy directions also in this section.  |
| Ecosystems, natural Areas & Parks                 | The establishment of greenways should consider how they will interface with local natural resource development, since it is so highly location specific (ie, the location of a wind turbine is determined by the site’s wind attributes)  |
| Local Economic Development                        | Agree with the inclusion of the mining and metal processing sectors into the “forestry and other resource industries” comment. <ul style="list-style-type: none"> <li>• Add in the potential for renewable energy generation and transmission</li> </ul>                            |
|   | Under the policy directions include: <ul style="list-style-type: none"> <li>• renewable energy development; and</li> <li>• the reduction of energy consumption by local industry to promote stability of local economy (greater resilience against rising energy costs).</li> </ul> |
| Transportation                                    | In the “issue overview” section include the relationship between increased efficiency in transportation and decreased GHG emissions and non-renewable energy use.   |
| Climate Change                                    | Missing from this section policy direction for: <ul style="list-style-type: none"> <li>• renewable energy generation;</li> <li>• district energy systems;</li> <li>• consumption of energy reduction (smaller carbon footprint)</li> </ul>  |

## General Comments for the IAC

### Aggregate

The Comox Valley Regional District should include more in-depth aggregate planning in the RGS. Designated green areas and industrial zones can be difficult to re-establish. We advise that consideration over the determination of the boundaries be given at the regional growth strategy's planning stage.

Planning for supply of aggregate is important because:

- Aggregate is imperative to the development and maintenance of infrastructure and buildings (ie: apartments, roads, bridges)
  - Public works and infrastructure account for approximately 65-70% of current demand for aggregate
  - A new home requires about 208 tonnes of aggregate
- Planning provides clarity on where aggregate resources are located, and moreover, where it can potentially be extracted.
  - Without aggregate supply growth is restricted.
  - Locally sourced aggregate supply is preferred because it offers:
    - a. Greater security of supply
      - Other regions do not have to accommodate RDN's demand
    - b. Lower costs for transportation
      - Aggregate is a very heavy product to move, transportation can easily account for 50% or more of the total cost of aggregate for the end user.
    - c. decreases GHG emissions from transportation distance
- Planning allows for a determination of greenways, parks, roads, and new development that do not hinder future strategic growth in the region by cutting off or building over a needed aggregate supply.
- Planning addresses concerns over locations suitable for processing and manufacturing
- Aggregate industry provides local jobs in the natural resource sector, transportation and secondary industry.
- For all regions the question of landfill is an issue. Allowing for safe waste (as determined by MoE) to be used for reclamation of aggregate sites is a possible option. Aggregate planning with the Province, paired with resulting municipal level soil deposit/removal bylaws, is a possible solution to waste disposal and the landfill issue.
  - MEMPR, MoE and MCRD hold concurrent authority over the approval of soil related bylaws

## Energy

The Comox Valley Regional District has incorporated into the RGS the concepts of increased transportation efficiency and low impact development to reduce GHG emissions.

Another key way GHG emissions can be lowered is through district energy and renewable energy generation. Comox Valley can do more to plan for cleaner generation and transmission (energy systems) at the regional level. While the idea of clean energy systems may exist in plans outside of the RGS, incorporation of this key message and related goals into the RGS will mean there is a higher probability communities will work towards regional energy systems as the concept moves forward into Official Community Plans.

Moreover, the inclusion of direction for communities to reduce their energy consumption can also be added to the RGS. Lower energy demand translates to decreased GHG emissions and places the region in a good economic position against rising energy prices.

Providing planning for renewable energy generation and transmission at the regional level is important because:

- Inter-municipality scope of energy systems requires strategic guidance at the regional level
- Planning for energy systems can be directly linked to GHG reduction targets
- Population increases and industry growth create an increase in energy demand that needs to be addressed. Planning allows for integration of regional specific strategies with provincial strategies ensuring local needs are considered.
- The renewable energy sector offers economic development benefits (jobs, tax income, training, etc) that can be nurtured by strategic planning
- Local energy sourcing identified in planning contributes to a decreased transmission requirements and strain on the present energy systems, mitigating increased energy costs
- Energy system planning for a region ensures planning interacts with other land use designations harmoniously, reducing barriers to the economic development of the sector.

### Natural Resource Sector

The Comox Valley Regional District can provide more significant recognition of the natural resource sector as they relate to land designations in the RGS .

The intent of Regional Growth Strategies when establishment in the 1990s was to maintain the integrity of a secure and productive resource bases. This concept is seen today in the Local Government Act, section 849 (1);

“The purpose of a regional growth strategy is to promote human settlement that is socially, economically and environmentally healthy and that makes efficient use of public facilities and services, land and other resources.”

849 (2) stresses that RGS should work toward numerous key priorities but not limit the purpose stated above. *Resources* in this statement include energy, and aggregate resources.

The RGS should consider the efficient use of land and other resources when determining strategies to address social, economic and environmental objectives. This includes understanding resources capacity, location and characteristics in the region so that land and resources values are considered by decision makers when determining zoning and development restrictions.

- Example: Is there aggregate potential below a piece of land being considered for a highway expansion?
- Example: When defining activities suitable to specific spaces/areas include what types of natural resource activity are appropriate for land use