## Lauri Feindell

From: int: : Cc: Subject: Christopher Garrish August 20, 2022 3:02 PM 'Mel Kotyk' Tim Roberts; Bill Newell; Nikita Kheterpal RE: Area G Draft OCP Public Hearing

Hi Mel,

Thanks for providing this additional feedback regarding the draft Electoral Area "G" OCP Bylaw. Your comments will be placed on file and made available for viewing at the public hearing, which is scheduled for this coming Tuesday August 23<sup>rd</sup> in <u>Keremeos</u> (from 1-3pm) and later in <u>Hedley</u> (from 5-7pm), and for viewing by the Board when it considers the feedback received in relation to the public heading and prior to consideration of 3<sup>rd</sup> reading.

As you may be aware, the option to defer consideration of 3<sup>rd</sup> reading and to direct that additional consultation opportunities occur (i.e. a 2<sup>nd</sup> public hearing) is available to the Board. Other options for the Board will include approving third reading or abandoning the bylaw.

I trust that this is of assistance.

Sincerely,

Chris.



Christopher Garrish MCIP, RPP • Planning Manager Regional District of Okanagan-Similkameen 101 Martin Street, Penticton, BC V2A 5J9 p. 250-490-4101 • tf. 1-877-610-3737 • f. 250-492-0063 • <u>www.rdos.bc.ca</u> • <u>cgarrish@rdos.bc.ca</u>

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-----Original Message-----From: Mel Kotyk < Sent: August 17, 2022 12:41 PM To: Christopher Garrish <cgarrish@rdos.bc.ca> Cc: Tim Roberts <troberts@rdos.bc.ca>; Bill Newell <bnewell@rdos.bc.ca> Subject: Area G Draft OCP Public Hearing

Dear Mr. Garrish

As Chair of the Citizens Advisory Committee for the development of the inaugural Area G OCP, I am formally requesting that the Public Hearings scheduled for August 23 & 24, 2022 be postponed.

As you are aware, the residents of Olalla have recently experienced a traumatic evacuation from their homes due to wildfire. These residents are now putting their lives back together after being forced from their homes and it is inappropriate to expect them to read, consider, and adequately input into the Public Hearing days after returning home. The current timing of the Public Hearings is extremely insensitive to the residents of Olalla and what they presently went through.

You are also aware that for a great number is Area G residents this is the height of the harvest season for those who farm, and the height of the tourist season for those in the service industry. It is too much to ask these residents to forego much needed revenue at the peak of their season to attend a Public Hearing. Many service providers from motels, restaurants, grocery stores, etc. have gone through great effort to accommodate those displaced and are also now getting their business back on track. Holding the Hearing in Keremeos in the middle of the afternoon - on a weekday - is inappropriate and an affront to those in rural Keremeos and Hedley.

With respect, I ask that you consider the importance of an inaugural OCP has on this community, the impact this Public Hearing will have on these residents, and the trauma many have recently experienced with the evacuation due to the wildfire. A one week notification, at this particular time in the lives of this community, is inappropriate.

Therefore I request that the Public Hearing be postponed.

Thank-you

Mel Kotyk Chair, Citizens Advisory Committee

Sent from my iPad

## Lauri Feindell

From:	keremeosirrigation@gmail.com
Sent:	August 2, 2022 11:29 AM
То:	Planning
Subject:	RESPONSE SUMMARY FOR AMENDMENT TO BYLAW NO.L 2975 OCP FOR ELECTORIAL AREA "G"
Attachments:	08-1440-0192 Keremeos Phase IV GWPP Feb 23-10.pdf; RDOS RESPONSE SUMMARY BYLAW NO_ 2975 FILE G2020_017-ZONE.pdf

Attention: Chris Garrish

Good morning Chris;

Sorry for the late response on this; we were having to locate a digital copy of the attached Golder Phase IV Groundwater Protection Plan, specifically establishing capture zones around our aquifers for the protection of the groundwater that supplies the Village of Keremeos and the Keremeos Irrigation District. Our response summary is attached as well. Please let me know if you get this ok, and if there is anything else you may need from us. Thanks Chris, enjoy your day.

1

Cheryl



(250) 499-5696 Fax (250) 809-8548 Mobile kid@nethop.net

> G2020,007-20Ne, Represents. Area G.

**AMENDMENT BYLAW NO. 2975**  Approval Recommended for Reasons □ Interests Unaffected by Bylaw **Outlined Below** I Approval Recommended Subject to □ Approval Not Recommended Due **Conditions Below** to Reasons Outlined Below Attention: Chris Garrish In response to the amendment to RDOS Bylaw No. 2975, for the official community planning for Keremeos, please see the attached: PHASE IV GROUND WATER PROTECTION PLAN LONG TERM ACTION PLANNING & PRELIMINARY CONTAMINANT UPDATE This report was completed by Golder Associates in 2009 and includes on the final page, FIGURE 2 all capture zones for the protection of the groundwater wells servicing the Keremeos Irrigation District and the Village of Keremeos. Signed By: Signature <u>RRIGATION DES</u>RICT Title: Agency: Date: Bylaw Referral Sheet - G2020.017-ZONE Page 2 of 2





February 23, 2010

Project No. 08-1440-0192

Ms. Joni Heinrich, CAO Village of Keremeos 702-4th Street PO Box 160 Keremeos, BC V0X 1N0

### PHASE FOUR GROUNDWATER PROTECTION PLAN LONG-TERM ACTION PLANNING AND PRELIMINARY CONTAMINANT INVENTORY UPDATE VILLAGE OF KEREMEOS AND KEREMEOS IRRIGATION DISTRICT

#### Dear Ms. Heinrich

Golder Associates Ltd. (Golder) is pleased to present this letter report summarizing the fourth phase of Groundwater Protection Planning (GWPP) for the Keremeos water supply. This phase of GWPP involves updating the preliminary contaminant inventory, previously completed as part of Phase Two and the development of a Long-Term Action Plan.

The Long-Term Action Plan is a planning tool developed to assist the Village of Keremeos (VOK) and the Keremeos Irrigation District (KID) to identify groundwater protection measures, prioritize action items, identify strategies for completion of the plan and provide cost estimates of action items where applicable.

## 1.0 BACKGROUND

KID is the purveyor of the water system for Keremeos and the outlying area. KID supplies irrigation water for agriculture and drinking water to businesses and residents with the Village of Keremeos. The KID operates a number of large capacity supply wells located in three areas referred to as; the West Well Field, the 1<sup>st</sup> Avenue Well and the East Well Field, identified in Figure 1. KID is the only large purveyor in the Keremeos area.

KID and VOK have been jointly undertaking the development of a Groundwater Protection Plan (GWPP) for the Keremeos water system, as the VOK obtains all their drinking water from KID and the VOK is the KID's largest single customer. Also, as a municipality, the VOK can assist in implementing groundwater protection measures by developing land use policies in the groundwater capture zone areas within the VOK municipal boundaries.

The results of the first three phases of GWPP have been summarized in the following Golder reports:

Phase One - Groundwater Protection Planning, Keremeos, BC, July 27, 2004 (Project 03-1440-161). Phase One initiated Step 1 and Step 2 of the Wellhead Protection Toolkit (WPT) and included a hydrogeological assessment of the area and a preliminary estimate of Time of Travel (TOT) zones for community wells using the Calculated Fixed Radius method.





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- Phase Two Groundwater Protection Planning, Keremeos, BC, June 27, 2006 (Project 05-1440-127). Phase Two included the development of a numerical model and conducting a preliminary contaminant inventory (Step 3 of the WPT). The numerical model was based on the conceptual hydrogeologic model developed in Phase One and used to refine the TOT zones for the community wells.
- Phase Three Groundwater Protection Planning, Keremeos, BC, May 8, 2008 (Project 06-1440-260). Phase Three refined the numerical model by calibrating the model to the local hydraulic gradient estimated from collecting static water levels in the Keremeos area.

## 2.0 LONG-TERM ACTION PLAN

### 2.1 Method

- The initial stage of the project involved developing a preliminary Long-Term Action Plan using the results of the first three phases of the GWPP for the Keremeos water supply as a foundation. The preliminary plan was then presented at a workshop held on October 7, 2008, at the VOK municipal town office. The workshop format was deemed as the most efficient means of gathering input from operators and water supply stakeholders. Those in attendance at the workshop were:
- Kevin Huey, Superintendent, Keremeos Irrigation District
- Joni Heinrich, Chief Administrative Officer, Village of Keremeos
- Ed Minshull, Councilor Member, Village of Keremeos
- Zee Marcolin, Environmental Engineer, Golder Associates Ltd.
- Jillian Sacre, Senior Hydrogeologist, Golder Associates Ltd.
- Jacqueline Foley, Senior Hydrogeologist, Golder Associates Ltd.

Discussions within the workshop focused on the merits of each action item identified in the preliminary Long-Term Action Plan, strategies to complete each action item, identifying possible funding sources and proposing potential scheduling goals. As well, other issues of concern for groundwater protection and management were also added to the plan. The preliminary plan was then refined based on the discussion and suggestions provided within the workshop and is provided below.

## 2.2 Results

The Long-Term Action Plan developed for the Keremeos water system is summarized and presented in Table 1 (attached).

It should be noted that KID and VOK have applied for a Federal Infrastructure Grant to upgrade their water system. The upgrade will include installing a reservoir to pressurize the distribution system. This will provide flexibility in managing the water supply and will allow any of the three well fields to supply the entire system, if required. When this upgrade is completed, KID intends to utilize the West Well Field to supply drinking water to the VOK during normal operations due to the superior water quality from this area. The 1<sup>st</sup> Avenue Well and the East Well Field will be used mainly to supply irrigation customers during normal operations. The prioritization of action items in the Long-Term Action Plan reflects this future groundwater management approach.

Other issues that were discussed during the workshop, but not included in Long-Term Action Plan were:

Well completion requirements as outlined in the BC Groundwater Protection Regulation (GWPR) (BC Reg. 299/2004). According to Mr. Huey, all KID municipal supply wells are compliant with the BC GWPR well completion requirements. All wells have Well ID Plates, a surface seal and annular seal, are covered and flood protected, have a minimum 0.3 m well casing stickup above ground/floor and are graded to eliminate ponding at the wellhead. Therefore, no upgrades are required for any of the KID wells.



- The 1<sup>st</sup> Avenue Well has a flow meter, and hence this improvement was not mentioned in the plan.
- A Drought Assessment and Management Plan has been completed for KID.

Long-Term Action Plans are dynamic documents and therefore require review and revision over time as items within the plan are completed or as tasks and completion strategies are refined or added due to unforeseen changes (i.e., legislative changes, conditions within operating permits, etc.). The Long-Term Action Plan developed for the Keremeos water supply should be reviewed on an annual basis and updated when major changes to the system, management or legislation occur. KID and VOK may also want to consider expanding the Long-Term Action Plan to include capital works and other groundwater management items to organize all future projects.

## 3.0 PRELIMINARY CONTAMINANT INVENTORY UPDATE

## 3.1 Background

In Phase Two of GWPP, a numerical hydrogeologic model for the Keremeos water supply aquifer was developed by Golder and a preliminary contaminant inventory was completed. The preliminary contaminant inventory focused on land use issues within the 60-day and 1-year time of travel (TOT) zones predicted for each well field using the numerical model. The numerical model in this phase was calibrated using the local hydraulic gradient estimated from the static water levels reported in the Ministry of Environment (MOE) Well database. The resultant TOT zones predicted for all three well fields were elongated with a north to south directional influence and were solely influenced by groundwater from the Keremeos Creek Valley.

Due to the uncertainty in the predicted TOT zones, Phase Three of GWPP involved calibrating the numerical model to field measured water levels to estimate the local hydraulic gradient. The predicted TOT zones from the field calibrated numerical model changed the TOT zones significantly, especially the TOT zones of the West Well Field. The refined TOT zones were more circular with a west to east directional influence and predicted that the West Well field was solely influenced by the Similkameen River Valley and the 1<sup>st</sup> Avenue Well and the East Well Field was influenced by both the Keremeos Creek Valley and the Similkameen River Valley. Hence, the Phase Three GWPP report recommended the preliminary contaminant inventory be updated to reflect the refined TOT zones, the results of which are provided in the following section.

## 3.2 Preliminary Contaminant Inventory Update Results

The preliminary contaminant inventory update focused on assessing land use within the 100-day and 1-year TOT zones of KID's three well fields, as predicted in *Scenario 2: Recommended Maximum Pumping Rate Conditions* of the field calibrated numerical model results (See Figure 7 of Phase Three of the GWPP, Golder 2008). Scenario 2 was used as it represents the most conservative scenario (i.e. largest TOT zones) by utilizing the maximum pumping rate of all the wells on a continual basis. The TOT zones account for peak pumping rates (i.e., two to four months during the summer) and provide a buffer area around the 1-year TOT zones predicted for the average pumping rate Scenario 1 in Phase Three of GWPP. The 100-day TOT zones were estimated (as opposed to the 60-day TOT zones in the earlier model version) to reflect requirements in the draft BC *Guidance Document for determined Ground Water at Risk of Containing Pathogens and Ground Water Under Direct Influence of Surface Water* (GUDI), which have yet to be finalized.

The update also used the local land use information gathered for the preliminary contaminant inventory completed in Phase Two of GWPP. Based on conversations with VOK and KID representatives, the only new developments that could significantly impact the local groundwater conditions is the installation of sewage collection pipes for some of the high capacity septic systems located adjacent to the 1<sup>st</sup> Avenue Well. According to Mr. Stanley of the Village of Keremeos, the Village's main sewer and service lines have been installed and, according to the VOK bylaw, each lot must connect to the sewer system by 2011.

A summary of land uses within the 100-day TOT zones and the 1-year TOT zones for each well field is provided in Table 2. Table 2 also provides the potential contaminants of concern associated with each land use listed.



The locations of the specific land uses that may pose a potential risk to the water quality of the community water supply wells are provided in Figure 2.

The following provides a summary of the specific land uses of concern identified within the 100-day and 1-year TOT zones of the community well fields:

- There are domestic septic systems within the 100-day and 1-year TOT zones for all three of the community well fields. The risks associated with septic fields are that improper use and maintenance can lead to negative impacts to water quality. Contaminants of concern from septic systems include nitrates/nitrites, detergents, oils, solvents and other household contaminants that may be disposed of by flushing or washing down a sink. There is an additional concern with biological pathogens from septic systems within the 100-day TOT zones, which may not have sufficient renovation time before reaching the municipal wells.
- Highway 3 crosses through the 100-day TOT zone of the West Well Field and the East Well field, while Highway 3A crosses through the 100-day TOT zone of the 1<sup>st</sup> Avenue Well and the 1-year TOT zone of the East Well Field. Highways 3 and 3A are maintained by the Ministry of Transportation and road salt is applied in the winter months. Road salt can negatively affect water quality by increasing the sodium and chloride content. These main transportation corridors also increase the risk of contamination to aquifers from highway spills and accidents releasing automotive fluids and other contaminants.
- The West Well Field is located within the 200 year flood plain of the Similkameen River, increasing the potential of flooding to these wells. However, VOK maintains dikes along the Similkameen River to protect the Village from flooding and all the municipal wells are in compliance with the BC Groundwater Protection Regulation (i.e., they have been "flood-proofed"). The 1<sup>st</sup> Avenue Well and the East Well Field are above the predicted 200 year flood plain of the Similkameen River. There is no 200 year flood plain mapping available for Keremeos Creek.
- There are private wells reported in the MOE Well database within the 100-day and 1-year TOT zones for all the community well fields. No information is known about these wells as to whether they are still in use, properly cased or capped, or grouted if decommissioned. Improperly cased or abandoned wells could provide a direct conduit for contaminants to the underlying aquifer.
- All three community well fields have agricultural land use within their 100-day and 1-year TOT zones. Agricultural practices can introduce pesticides, fertilizers, nitrites/nitrates and other chemical contaminants, depending on specific land use. Bacteria and viruses can also be introduced if livestock is kept or if raw manure is spread on agricultural fields.
- The East Well Field has greenhouses within the 100-day TOT zone. Greenhouse operations typically use fertigation (applying fertilizers and other soluble agricultural products through the irrigation system). Runoff from these operations often is allowed to infiltrate when there is a lack of an irrigation collection and treatment system and can introduce fertilizers, nitrites/nitrates, pesticides, and other contaminants to aquifers.
- The West Well Field has a turkey farm within the 1-year TOT zone. High density annual production operations can introduce bacteria, viruses, nitrites/nitrates, antibiotics and other chemical contaminants, depending on specific land use. As the turkey farm is not within the 100-day TOT zone, the main chemicals of concern are nitrites/nitrates, antibiotics and other chemical contaminants that take longer to degrade in groundwater.
- There is an operational gas station located within the 1-year TOT zone of the East Well Field. Gas stations store large amount of fuels and have a higher risk of introducing hydrocarbons into aquifers from on-site spills or leaky tanks, pipes or pumps. Facilities that utilize older single-walled tanks with no secondary containment or protection are an even greater risk to water quality.
- An old gas station identified in the Ministry of Environment Contaminated Site Registry system (MOE Site ID 2651) is located within the 1-year TOT zone of the East Well Field. The Contaminated Site Registry system reports that the Ministry of Municipal Affairs sent a letter to the site owner in 1993 stating that "tanks"



*will have to be removed"*; however, no follow-up actions were reported. Hence, it is unclear whether the tanks were removed, if the site was assessed for contamination or if remediation was required. Old gas station facilities have a high risk of contaminating aquifers with petroleum hydrocarbon products from old leaks and spills from tanks and other on-site amenities.

- The Keremeos Sewage Treatment Plant (STP) is located at the edge of the 1-year TOT zone of the East Well Field. The STP is an enclosed secondary treatment facility. The sewage sludge is centrifuged and the leachate is returned to the STP. The sludge solids are composted on-site on an impervious area with a concrete base. Effluent from the STP is released to the environment via rapid infiltration basins. The rapid infiltration system is operated under Ministry of Environment Permit (PE-05928) and the Village of Keremeos conducts a groundwater monitoring program.
- Sewer Lift Station #1 is located at the edge of the 1-year TOT zone of the East Well Field. Other lift stations drain into Sewer Lift Station #1 via gravity and Sewer Lift Station #1 pumps the sewage directly into the screening plant of the STP. It is located one block away from the STP and pumps sewage upgradient approximately 4.2 m with a variable force pump. There are no pressure alarms or monitoring conducted to detect leaks from this lift station.
- There are storm water disposal facilities within the 1-year TOT of the East Well Field, including an open ditch and a storm outfall into the Similkameen River. Ditches can promote infiltration of groundwater if ponding occurs. Stormwater runoff, particularly from roads, commonly contains contaminants such as salt, oils, antifreeze, metals, and biological constituents.
- All three community well fields have residential land use within their 100-day and 1-year TOT zones. Residential land use can introduce similar contaminants as agricultural land, such as pesticides, fertilizers, nitrites/nitrates and other chemical contaminants depending on land use.
- The high school, two motels and a learning centre are located within and adjacent to the 100-day TOT zone of the 1<sup>st</sup> Avenue Well and within the 1-year TOT zone of the East Well Field. Although these facilities all have high capacity septic systems of unknown age and condition, they are required to connect to the Village of Keremeos sewer system by 2011, as required by city bylaw.
- The Old Grist Mill, a local tourist attraction, is within the 1-year TOT zone of the East Well Field. Although the risk of pathogens impacting water quality in the East Well Field wells is low, there is a risk from other contaminants not readily broken down in groundwater such as nitrates, detergents, oils and other chemical contaminants that may be disposed of by flushing or washing down a sink. That being said, this facility is on the opposite side of Keremeos Creek from the East Well Field and it is possible that the 1-year TOT zone of the East Well Field may not extend beyond the Creek bed.
- The Ministry of Transportation Works Yard is at the edge of the 1-year TOT zone of the East Well Field. This site is listed in the Contaminated Site Registry system as MoE Site ID 7498. A Site Registry system report for this property indicates that remediation was completed in 2001 and contaminated soil was relocated to the Penticton Landfill. The report does not indicate the type of contamination. The status of the site is listed as *Inactive – No further Action*. Although remediation was completed, there may still be road salt or fuel storage on-site. Road salt is extremely soluble and can degrade groundwater quality if proper storage and loading practises are not followed.
- There is some concern about two privately-owned properties within the 100-day TOT zone of the East Well Field that contain junk stockpiles including old vehicles. The contents of these junk piles are unknown and the potential exists that these stockpiles could release a variety of contaminants into the ground, including fuels, oil, glycol, and other chemicals including paints, solvents, pesticides and fertilizers.
- According to the numerical modeling, the 100-day TOT of the West Well Field intersects the Similkameen River under maximum pumping rates, which would flag this well field as potentially "groundwater under the direct influence of surface water (GUDI). However, when the model uses an estimate of average pumping rates for the wells, the 100-day TOT zone of the West Well Field does not intersect the Similkameen River



(see Scenario 1 of Figure 7 of Phase 3 of GWPP), and the West Well Field would not be flagged as GUDI. As different pumping scenarios influence whether the well would be flagged as GUDI, further information and investigations are required to assess GUDI status of this well field. The Keremeos Irrigation District has indicated that they plan to install a flow meter in the West Well Field, which will provide information to aid in the development of a management strategy that could operate this well field so that GUDI conditions do not occur.

Although geothermal wells were not identified within the community well TOT zones, VOK and KID should be aware that geothermal systems can present a risk to groundwater quality if they are not properly cased and sealed, as they can provide a conduit for surface contamination to enter into the aquifer. In addition, geothermal wells, especially open-looped systems, may have other adverse impacts to water quality and quantity issues, such as potential drawdown interference with other nearby supply wells and temperature effects on groundwater and/or surface water.

Two significant changes from the preliminary contaminant inventory completed in Phase Two of GWPP are noted as follows:

- The Keremeos Landfill is not within any of the 100-day or 1-year TOT zones for any of the community well fields. However, the Keremeos Landfill could be within the ultimate capture zone for the 1<sup>st</sup> Avenue well and the East Well Field, which could impact the water quality in the long term. Since concerns were identified regarding the results of the groundwater monitoring program for the Keremeos Landfill in Phase Two of the GWPP, periodically analyzing the 1<sup>st</sup> Avenue well for Volatile Organic Compounds (VOC) is recommended.
- The East Well Field was flagged as potentially GUDI in Phase Two of GWPP as the initial model results predicted that Keremeos Creek was within the 60-day TOT. However, the predicted 100-day TOT zone of the East Well Field does not intersect Keremeos Creek in the field calibration of the model in Phase Three of GWPP. Hence, the East Well Field does not meet any of the screening criteria to identify potentially GUDI wells based on the BC draft GUDI protocol (not yet finalized) and the Ontario GUDI protocol.

## 3.3 Preliminary Risk Assessment of Water Quality Threats

The following section outlines the qualitative risk assessment completed for the contaminant inventory update. Risk assessments are a useful tool to assist purveyors in prioritizing action items for groundwater protection and allocating funding resources.

When assessing risk, the focus was on land use within the 100-day and 1 year TOT zones of the municipal well fields. The risk assessment criteria used was modified from that used in Phase Two so that it included aspects of the risk assessment framework provided in the Module 7: Characterize Risks from Source to Tap in the Source to Tap Assessment Guide developed by the BC Water and Waste Association (BCWWA). The risk assessment is based on the following criteria:

### *RISK* = *LIKELIHOOD x CONSEQUENCE*

Where:

Pro	bability of Occu	irrence
1	Unlikely.	Could occur at some time.
2	Possible.	Will probably occur at some time.
3	Likely.	Is expected to occur in most circumstances.
4	Almost Cert	ain. Hazard is will occur in most circumstances.

When assessing probability, it was assumed that biological hazards within the 100-day time of travel zone would have potential health consequences and hazards outside of the 1-year TOT zones were not included in the assessment.



**Consequence of Exposure** 

1	Slight Effect.	Degradation in water quality but within standards, minor impact on operating costs.
2	Moderate Effect.	Moderate change in water quality requiring mitigation (treatment of water supply) or have significant cost operating or monitoring budget.
3	Major Effect.	Significant change in water quality that cannot be mitigated by treatment or could potentially cause acute health outcomes.

Note: The ranking of potential consequences are based on an estimate of potential responses to generalized hypothetical scenarios to assist in prioritizing future actions. Actual consequences may differ and would depend on site-specific conditions.

The following risk matrix was used to rank and prioritize risks for the risk assessment:

		Probability of Occurrence				
		1.	2	3	4	
Consequence of Exposure	1	1	2	3	4	
	2	2	4	6	8	
	3	3	6	9	12	

Where: Consequence × Probability = Risk

And the risk levels are: Low: 1 - 2 Moderate: 3 - 4 High: 6 Very High: 8 - 12

The results of the risk assessment are provided in Table 3 for the West Well Field, Table 4 for the 1<sup>st</sup> Avenue Well and Table 5 for the East Well Field and have been incorporated into the Long-Term Action Plan. The results indicate that agricultural land use practices and septic systems within the 100-day TOT zones of all three wells have a "very high" risk rating and should be assigned a high priority. Other "very high" priorities identified in each municipal well field are the potential GUDI status of the West Well Field, the junk stockpiles on private land near the East Well Field and the large capacity septic systems within the 100-day TOT of the 1<sup>st</sup> Avenue Well. However, the large capacity septic systems are required to connect to the municipal sewer system by 2010, which will reduce their risk level to the 1<sup>st</sup> Avenue Well when connection is completed.

Suspected abandoned wells were all identified as a "high" priority in all three well fields. Other well field specific hazards with a "high" risk rating are the turkey farm near the West Well Field and the gas stations (active and inactive) and the greenhouses within TOT zones of the East Well Field. The remaining hazards identified in the preliminary contaminant inventory have either "moderate" or "low" risk ratings.

The updated risk assessment completed in this report is cursory only, based on the preliminary contaminant inventory update, and does not identify specific threats. For example, the assessment identifies the potential hazard of Major Transportation Routes (Highway 3 and 3A), however, does not identify specific threats such as identifying specific bulk haulers transporting bulk fuels or hazardous wastes along these routes, or the rate of application of road salt. Specific threats may be incorporated into the risk assessment table as they are identified in future GWPP steps and if a detailed contaminant inventory is completed. The risk assessment tables can also be easily expanded to include objectives, targets, plans of action and responsibilities.



## 4.0 CLOSURE

We trust that this provides you with the information you require at this time. Should you require additional information, please feel free to contact the undersigned at your earliest convenience.

GOLDER ASSOCIATES LTD. OFES MARCOLIN 27488 4 D 1111151 Jacqueline Foley, M.Sc. Zee Marcolin, P.Eng. 4 11 11 Associate, Senior Hydrogeologist Environmental Engineer NE ZM/JF/cfh Long-Term Action Plan, Keremeos GWPP Attachments: Table 1 Table 2 Summary of the Preliminary Contaminant Inventory Within the 100-Day and 1-Year TOT Zones of the Community Wells, Keremeos, BC Table 3 Preliminary Risk Assessment for West Well Field Table 4 Risk Assessment for 1st Avenue Well Table 5 Risk Assessment for East Well Field Figure 1 Key Plan Figure 2 Preliminary Contaminant Inventory Update

http://capws/p824121kidphaselvgroundwaterprotectionplan/reports/wp\_final/keremeos letter report feb 23-10.docx



Ms. Joni Heinrich, CAO Village of Keremeos

08-1440-0192 February 23, 2010

Table 1: Lor	g-Term Action Plan, Keremeos GWPP			
lssue	Action Item - Task and Description	Strategy	Priority and Scheduling	Funding Options/ Cost Estima <u>t</u> e
Contaminant Inventory	<ul> <li>Complete a <u>Detailed Contaminant Inventory</u>:</li> <li>⇒ Inventory of Septic Systems</li> <li>⇒ Inventory of Storm Water Disposal Facilities</li> <li>⇒ Inventory of Private Wells – active &amp; inactive, collection of well logs, if available</li> <li>⇒ Specific land uses and associated risks (business, agricultural, industrial)</li> <li>⇒ Chemical use</li> <li>⇒ Upgradient mine tailing sites</li> <li>⇒ Update risk assessment</li> <li>⇒ Geothermal Systems</li> </ul>	Hire summer student to go door to door to gather required information. Have student educate residents at the same time on Best Management Practices (BMP) based on their land use. Start with properties within the 100-day time of travel (TOT) zones, and then expand to 1-year TOT and beyond. Develop questionnaire for student to assist in information gathering and identify BMPs to provide.	Examine if funding available for summer 2009. May take 2 summers to complete. Develop appropriate checklists and information package for student to use before program is initiated	Apply for grant to hire student through applicable funding agency. Funding may be required to develop a data base for the information.
Contaminant Inventory: Risk from Landfill	<ul> <li>Further Assessment of <u>Landfill Leachate Potential</u>:</li> <li>Analyze sample yearly from 1st Avenue Well for Volatile Organic Compounds (VOC) (contact RDOS to advise of sampling and discuss potential landfill risks)</li> </ul>	KID to sample well and submit to lab, Golder to review results, if required.	High Priority, complete in 2009	\$400/sample to analyze
Protection Measures - All Well Fields	<ul> <li>➢ Based on specific risks identified in the Preliminary Contaminant Inventory Update and not included in detailed contaminant inventory strategy above, the following relate to risk reduction for all Well Fields:</li> <li>⇒ Contact the Ministry of Transportation regarding risk in TOT zones of all municipal well fields – are the speed limits in the TOT zones appropriate? Is there a spill response procedure for this area? Is road salt used in these areas and what is the application procedure? Ensure that KID/VOK will be notified if a chemical spills occurs in the area.</li> <li>⇒ Assess Well Head Security (locked pump house, fencing, alarms).</li> </ul>	Either incorporate some or all of actions into Detailed Contaminant Inventory for summer student or complete during other program.	Moderate Priority	



Ms. Joni Heinrich, CA0 Village of Keremeos	)		08-1440-0192 February 23, 2010
Protection >	Based on specific risks identified in the Preliminary	Either incorporate some or	High to Moderate

Measures -East Well Field Contaminant Inventory Update for the East Well Field and not included in detailed contaminant inventory strategy:

- $\Rightarrow$  Contact Ministry of Transportation regarding previous remediation, current salt storage facilities and loading practices in the MOT Works Yard. Indicate that this area could impact drinking water guality and that Best Management Practices should be followed.
- ⇒ Contact Greenhouse owners as to irrigation and fertilization practises and educate that activities could impact local groundwater guality. May need to examine runoff collection and treatment.
- ⇒ Contact owner of junk stockpiles to discuss potential hazards to water supply.
- $\Rightarrow$  Gather more information on active and inactive gas stations from Contaminated Site Registry system and property owners. Were appropriate assessment and remediation work completed and what are the current potential risks to the water quality? What type of tanks are the operating gas station using and what other precautions/monitoring are in place?
- ⇒ Assess the VOK monitoring program for the Sewage Treatment Plant and facilities to ensure drinking water quality is included in the monitoring scope. Assess if the Septic Lift Station #1 requires groundwater monitoring or if a warning system is required (i.e. pressure gauge connected to alarm).
- ⇒ Assess potential impact of storm water ditch determine source of ditch run off and potentially test water quality during a runoff event.

all of actions into Detailed Contaminant Inventory for summer student or complete during other program.

Priority



Ms. Joni Heinric Village of Kererr				Fe	08-1440-0192 bruary 23, 2010
Protection Measures – West Well Field	:	⇒ Contact the turkey farm owners to review their waste	Either incorporate some or all of actions into Detailed Contaminant Inventory for summer student or complete during other program.	High to Moderate Priority	
Protection Measures – 1 <sup>st</sup> Avenue Well	3	The only risk identified for the 1 <sup>st</sup> Avenue Well that has not been dealt with in previous areas is the presence of large capacity septic fields; however, lot owners are required to connect their septic fields to the municipal sewer system by 2010, thereby reducing the risk at that time.		Connection to sewer – high priority	Main sewer lines already installed.
Information Gaps: West Well Field	A	<ul> <li>Installation of <u>Flow Meter</u> to measure water usage from West</li> <li>Well Field. Plan to install one flow meter on water main</li> <li>leaving West Well Field.</li> <li>The West Well Field will be designated as the drinking water</li> <li>supply for the VOK in the future (once reservoir is installed).</li> <li>Data gathered would be useful for:</li> <li>⇒ Compliance with Operational Permit</li> <li>⇒ Water Demand Management</li> <li>⇒ Refining Numerical Model &amp; Capture Zones</li> <li>⇒ Groundwater Under the Direct Influence of Surface Water (GUDI) Assessment</li> <li>⇒ Water Conservation Planning</li> </ul>	Installation of flow meter within manhole on water main in West Well Field is within grant application currently being reviewed by Ministry of Community Services	High Priority	\$20,000 (within infrastructure grant cost application already submitted)
Information Gaps: East Well	A	Installation of <u>Flow Meters</u> in East Well Field. Due to construction method of East Well Field, there are several water mains leaving this field, and therefore it requires installation of a number of flow meters. The East Well Field will be designated as an irrigation supply in the future (once reservoir is installed). Agricultural customers have flow restricting devices and therefore could calculate maximum water use.	There are no provisions within the grant application for metering of water usage from the East Well Field. Incorporate flow meter installation when works are being performed on wells in East Well Field.	Low Priority as future plans are to designate as an irrigation supply area.	\$15,000 to \$20,000 per well main



Data and Information Gaps: West and East Well Field	<ul> <li>&gt; Installing <u>sampling ports</u> in West and East Well Field wells. Sampling ports can be used for monitoring water levels (either with data loggers or manual monitoring with water level tapes) and collecting water samples.</li> <li>&gt; Most economical to complete when pump needs to be pulled for pump maintenance or well rehabilitation.</li> <li>&gt; Some wells may not have sufficient space between turbine pump outflow pipe and well casing to install a sampling port or may only have enough room to install a ½" to ¾" PVC pip which is too small for a data logger, but could still be used for manual monitoring.</li> <li>&gt; If sampling ports cannot be installed due to casing size restrictions, install monitoring wells to conduct aquifer monitoring.</li> <li>&gt; Data gathered would be useful for:</li> <li>⇒ Tracking Well Efficiency – could assist in deferring capit costs and developing well rehabilitations programs</li> <li>⇒ Water conservation planning</li> <li>⇒ Drought monitoring and conservation triggers</li> </ul>	greater), install a data logger. For sampling ports less than 1", establish aquifer monitoring program by	High Priority – install sampling ports in wells the next time pumps are pulled from wells.	Minimal costs to install sampling ports when pump is pulled (i.e. \$200 to \$500 per well) Data loggers - \$2,000/per well plus instalment Manual Sampling program - \$800 for water level plus operator time and hydrogeologist time to review
New Government Policies	<ul> <li>➢ Groundwater Protection Regulation (GWPR) requires decommissioning of abandoned wells, which can act as conduits for contamination to the aquifer</li> <li>➢ Potential strategy:</li> <li>⇒ Summer student documents all wells (active and inactive during door to door survey</li> <li>⇒ Identified wells are examined for potential to impact groundwater (surface seal, potential for ponding at wellhead, cap and cover, stick-up height &amp; well log if available)</li> <li>⇒ Provide decommissioning information to well owner or information to bring well up to BC GWPR standards if we still in use</li> <li>⇒ Prioritize decommissioning based on well condition</li> <li>⇒ Perform retrofits if high risk conditions occur (i.e., grade to eliminate ponding at well head, install proper cap or decommission if in particularly high risk area)</li> <li>⇒ Examine potential funding sources to assist well owner in decommission efforts</li> <li>⇒ Develop bylaw for decommissioning abandoned wells during development permitting process.</li> </ul>	programs. If funding becomes available, information stage will be completed.	Medium Priority	In discussion a a provincial level. Funding may become available.



Ms. Joni Heir Village of Ker	•	-		Fe	08-1440-0192 bruary 23, 2010
New Government Policies	A A	<ul> <li>IHA Filtration Policy requires purveyors to determine GUDI status of wells and if potentially GUDI, apply for a Filtration Deferral if meets requirements - Keremeos does not chlorinate.</li> <li>Based on the numerical model in Phase III of GWPP - the West Well Field could be at risk of the 100-day TOT intersecting the Similkameen River - KID can develop strategy to manage West Well Field to avoid GUDI conditions:</li> <li>⇒ Gather background information to support filtration deferral by collecting minimum of one year of turbidity monitoring data (Keremeos Wells typically have turbidity less than 0.1 NTU) and initiate quarterly sampling program for West Well Field &amp; Similkameen River (sampling results could also potentially assess upstream mining impacts on groundwater)</li> <li>⇒ Refine numerical model based on actual pumping rates once flow meter is installed and sufficient information is collected.</li> <li>⇒ Develop water management strategy to avoid GUDI conditions based on the information gathered.</li> </ul>	Develop monitoring program (i.e., turbidity monitoring and water quality sampling) to start collecting required data for filtration deferral application.	Turbidity and Sampling program is a High priority Priority of refining the numerical model is dependent on when accurate usage data can be obtained.	\$7,000 for sample analysis \$1,000 for hand held turbidity monitor, \$8,000 for hydrogeologist assessment plus operator time to sample
Water Emergency Response Planning (ERP)		<ul> <li>Keremeos has an ERP in place although Contingency</li> <li>Planning was not included - Keremeos is not very vulnerable</li> <li>as they have three distinct well field areas. Once the new</li> <li>reservoir is built, any of the well fields should be able to</li> <li>supply all areas of the KID system.</li> <li>⇒ Examine short term and long term potable water</li> <li>replacement options (currently have water sharing</li> <li>agreement with Cawston for emergencies)</li> </ul>	Develop a Contingency Plan for short and long term water shortages	Low Priority	Incorporate into another study if possible



Ms. Joni Hein Village of Kere			Feb	08-1440-0192 pruary 23, 2010
Water Conservation	<ul> <li>➢ Water Conservation is important for cost reduction (operational &amp; capital cost deferral) and could be important in future funding opportunities.</li> <li>➢ To initiate Water Conservation - establish goals and initiate monitoring to measure success</li> <li>➢ Water Conservation Tools to Consider:</li> <li>⇒ Meters for businesses and residents</li> <li>⇒ Leak Detection and Repair</li> <li>⇒ Water Demand Management         <ul> <li>Yard Use Restrictions</li> <li>Water Conserving Landscaping</li> <li>Water Reducing Hardware</li> <li>Public Education Programs</li> <li>⇒ Bylaws to support policies</li> <li>⇒ Water Conservation Stewardship Committee (or partner with other groups) to assist in implementation</li> </ul> </li> </ul>	Once flow meters are in place, start to measure demand and formulate conservation goals. Develop plan for installing meters on business and residential customers (agricultural customers have flow restriction devises based on the rate they pay, so no need to meter), conducting leak detection, and developing water management strategies and bylaws.	High Priority – develop plan and start to implement.	Dependant on Plan – funding options are available
Other Management Issues	<ul> <li>Develop Standard Operating Procedures (SOPs) for water system operation</li> <li>Training of Staff</li> <li>Incident Reporting and Mitigation Procedures</li> </ul>	KID will initiate development of SOPs KID will start developing a training protocol when they train new employees/operators.		

Local Policy Issues	<ul> <li>➢ Incorporate protection of groundwater quantity and quality into policies and bylaws</li> <li>➢ Prioritize future sewer installations to replace septic systems within 100-day and 1-year TOT zones for well fields</li> <li>➢ Development of Groundwater Protection Zones that reflect 1-year TOT zones for community wells –</li> <li>⇒ Restrict land use activity with zones:         <ul> <li>Permit to do work (especially excavations)</li> <li>No dry wells for grey water or road drainage within 1 year TOT (roof and rainwater drainage would be acceptable)</li> <li>Limitation of land use – i.e., no gas stations, chemical storage, pesticide use, heavy equipment or automotive storage, storm water guidelines</li> <li>Encourage development in less sensitive areas and where sewers are located or where sewer extension is planned</li> <li>Identification of abandoned wells and decommissioning plan before building/occupational permits are issued (or land transactions)</li> </ul> </li> <li>&gt; Drilling of wells (including geothermal) within town boundaries must be approved by VOK and well logs submitted to KID.</li> <li>&gt; Geothermal wells must have proper annual and surface seals and consider banning open looped geothermal systems within Groundwater Protection Zones.</li> <li>&gt; Organized hazardous waste collection through Regional District.</li> </ul>	KID and VOK to initiate discussions on appropriate policy development for the protection of groundwater. Need to include Regional District of South Okanagan (RDOS), as much of the land within the 100-day and 1-year TOT zones are within RDOS area	Medium to High Priority	
Public Outreach	<ul> <li>Develop public education plan (i.e. media releases, notes in water bills, pamphlets, etc.)</li> <li>Educate public on Groundwater Protection Issues and Water Conservation</li> <li>Disseminate Best Management Practices (BMPs) for high risk land use activities such as:         <ul> <li>Proper maintenance of Septic Fields</li> <li>Storm water disposal methods</li> <li>Household chemical disposal</li> <li>Hazardous waste disposal</li> <li>Fuel storage</li> </ul> </li> </ul>	KID and VOK need to develop a public outreach strategy that spans 3 to 5 years and then start to roll out.	High priority to develop plan and start to roll out	Dependant on Plan



Ms. Joni Heinrich, CAO	08-1440-0192
Village of Keremeos	February 23, 2010
Media Campaign – quantity/quality issues in Keremeos	

	Þ	Booths at public events (can send summer student to attend)			
Well Rehabilitation	A	<ul> <li>Develop a well rehabilitation plan</li> <li>⇒ Start by conducting pumping tests on individual wells to document current specific capacity and compare to specific capacity of wells when drilled (if information is available) or any other pumping test completed for individual wells</li> <li>⇒ Video tape well screens when pumps are pulled</li> <li>⇒ Start to monitor aquifer properties as sampling ports/ data loggers are installed</li> </ul>	Develop plan based on information available and priority of wells.	Medium priority	Dependant on Plan \$3,000 to \$6,000 per well for pumping test and videoing



#### April 2009

#### Table 2: Summary of the Preliminary Contaminant Inventory Within the 100-Day and 1-Year TOT Zones of the Community Wells Keremeos, British Columbia

Municipal Wells	Time of Travel Zone from Numerical Model <sup>t</sup>	Residential	High C <sub>upa</sub> city Septic	Damestic Septic Systems	Agricultural Land	Greenhouses	Turkey Farm	Similkameen Riv <sub>er</sub>	Within 200 Year Noodplain	Stormwater Facilities	Mafor Transportation Corridor	MOT Works Yard	Suspected Abandoned	Gus Stations (Active or Inactive)	Sowago Treatment Plant & Lift Station	Junk Stockpiles on Private Property.
West Well	100-Day	4		4	4			1	4		4		4			
Field	1-Year	A		1	V		7	7	1		1		1			
East Well	100-Day	1		1	√ <sup>°</sup>	1					4		1			4
Field	1-Year	4	4	1	4					1	4	4	1	√	4	
I <sup>st</sup> Avenue	100-Day	4	1	1	4						4		√			
Well	1-Year	4		1	4						1		4			

1. The Time of Travel zones using the maximum pumping rate conditions provided in Scenario 2 of the field calibrated numerical model in Phase III of GWPP were used to identify risks to each well field.

Potential Contaminants of Concern for Each Land Use

Residential: Lawn care chemicals (pesticides and fertilizers), common household products, and wastes related to property maintenance and automotive repair.

High Capacity Septic Systems: Produces large effluent volumes. Can contribute bacteria, viruses, nitrates, detergents, oils and chemical contaminants.

Domestic Septic Systems: Bacteria, viruses, nitrates, detergents, oils and chemical contaminants.

Agriculture: Pesticides, fertilizers, bacteria, viruses and nitrates if raw manure is used. Other chemical contaminants from equipment maintenance and repair.

Greenhouses: Pesticides and fertilizers.

Turkey Farm: Bacteria, viruses and nitrites/nitrates.

Similkameen River: Groundwater directly influenced by surface water (GUDI) conditions are at higher risk of bacterial/viruses contamination.

Within 200 Year Floodplain: Flooding of wellhead and access of surface water if wellhead is not waterproof, can contribute bacteria and sediment to the well system.

Storm Water Facilities: Can promote infiltrate of road runoff which is potentially contaminated with oil, fuels, salt, metals and pathogens.

Major Transportation Corridor: Salt from salt application to roads. Hazardous materials, oil, fuel and other chemicals from spills or accidents on Highway 3

Ministry of Transportation (MOT) Works Yard: Salt from salt storage on-site and other hazardous materials such as oil, fuel and other chemicals depending on land use. Suspected Abandoned Wells: Potentially providing a direct conduit to aquifers, could introduce bacteria, viruses, nitrates, detergents, oils, fuels and chemical contaminants.

Gas Statlors (Active or Inactive): gasoline, disel, waste oil; glycols, and other chemicals dependant on operations.

Sewage Treatment Plant and Lift Station: Can contribute bacteria, viruses, nitrates, detergents, oils and chemical contaminants.

Junk Stockpiles on Private Property: gasoline, diesel, waste oil, glycols, and other chemicals including paints, solvents, pesticides and fertilizers.

08-1440-0192

Table 3 - Preliminary Risk Assessment for West Well Field

Hazard	Risk Ranking	Priority Ranking
Agricultural Land	12	Very High
Domestic Septic Systems	12	Very High
Similkameen River (GUDI)	9	Very High
Suspected Abandoned Wells	6	High
Turkey Farm	6	High
Major Transportation - Salt Applications	4	Moderate
Residential	4	Moderate
Major Transportation - Accidents	3	Moderate
Within 200 Year Floodplain	2	Low

Table 4 - Risk Assessment for 1st Avenue Well

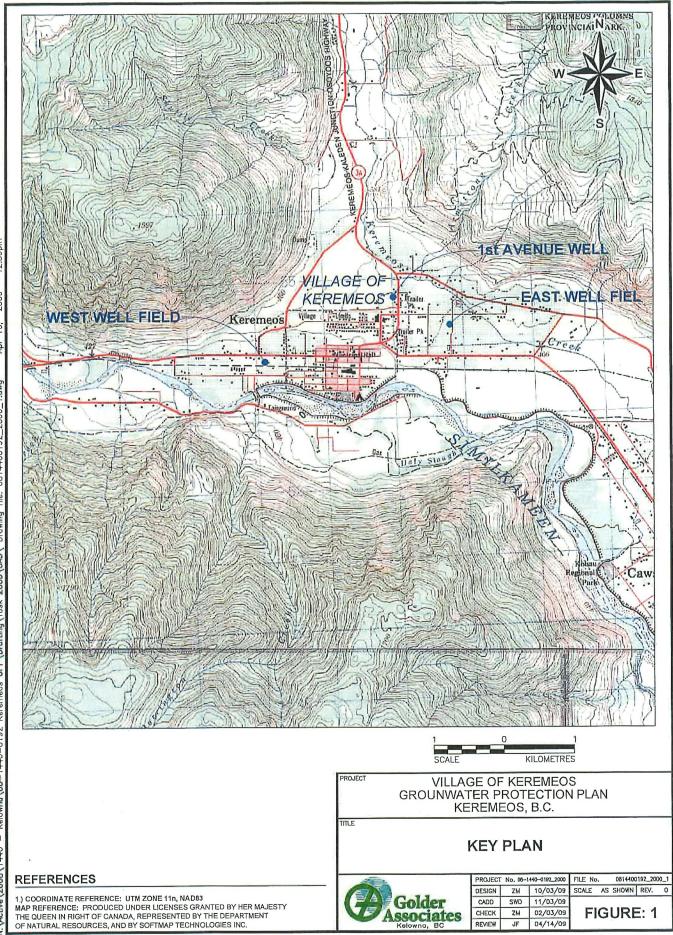
	Priority
Risk Ranking	Ranking
12	Very High
12	Very High
12	Very High
6	High
4	Moderate
4	Moderate
3	Moderate
	12 12 12 6 4 4 4

 The large capacity septic systems are required to be connected to the sanitary sewer: once the systems are connected, the risk will be reduced.

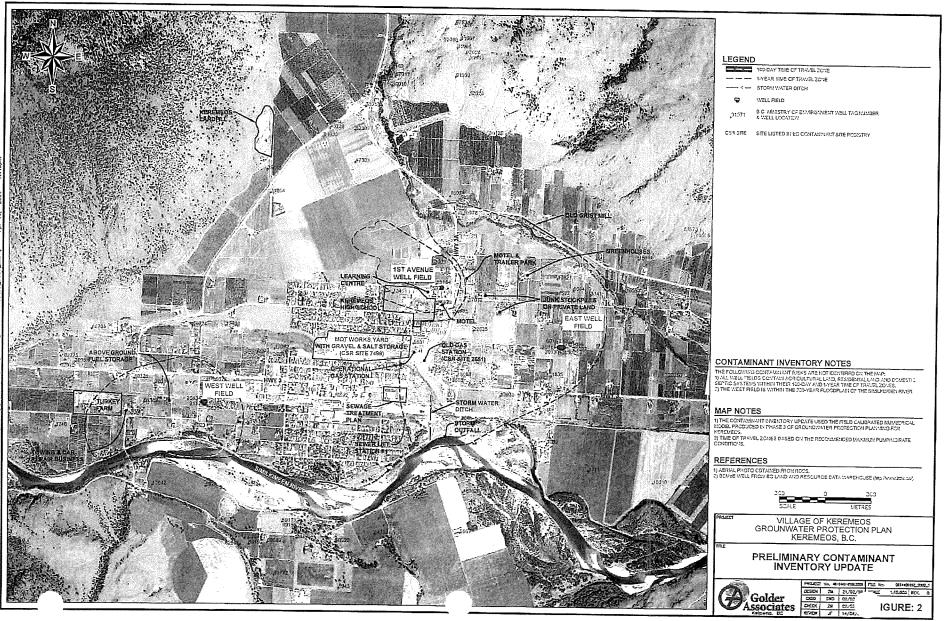
		Priority
Hazard	Risk Ranking	Ranking
Agricultural Land	12	Very High
Domestic Septic Systems	12	Very High
Junk Stockpiles on Private land	9	Very High
Large Capacity Septic Systems <sup>1</sup>	9	Very High
Gas Stations (active & inactive)	6	High
Greenhouses	6	High
Suspected Abandoned Wells	6	High
<b>Major Transportation - Salt Applications</b>	4	Moderate
MOT Works Yard	4	Moderate
Residential	4	Moderate
Major Transportation - Accidents	3	Moderate
Sewage Treatment Plant & Lift Station	3	Moderate
Stormwater Facilities	2	Low

Table 5 - Risk Assessment for East Well Field

1. The large capacity septic systems are required to be connected to the sanitary sewer : once the systems are connected, the risk will be reduced.



12:39pr 1 2009 Apr 16, file: 0814400192\_2000\_1.dwg Drawing Keremeos GPP/Drafting/Tosk 2000/CAD/ Kelowna 08-1440-0192 1 N:\Active\2008\1440





Agricultural Land Commission 201 – 4940 Canada Way Burnaby, British Columbia V5G 4K6 Tel: 604 660-7000 | Fax: 604 660-7033 www.alc.gov.bc.ca

July 19, 2022

Reply to the attention of Martin Collins ALC Planning File 46820

## planning@rdos.bc.ca

### **Delivered Electronically**

Re: Bylaw 2975 Electoral Area G OCP Bylaw

Thank you for forwarding Bylaw 2975 for review and comment by the Agricultural Land Commission (ALC). The following comments are provided to help ensure that the bylaw is consistent with the purposes of the Agricultural Land Commission Act (ALCA), the Agricultural Land Reserve General Regulation, (the "General Regulation"), the Agricultural Land Reserve Use Regulation (the "Use Regulation"), and any decisions of the ALC.

The Bylaw is the first OCP bylaw for Electoral Area G. The Bylaw includes an OCP land use map that accurately identifies ALR lands primarily as *AG-Agriculture*, but small areas are also identified as *SH* - *Small Holdings* and *RA* – *Resource*, *CT* -*Tourist Commercial* and *AI* - *Administrative/Institutional*.

## ALC Staff Comments:

ALC staff confirm that the policies in the *AG-Agriculture* zone are generally supportive of agriculture and the *Agricultural Land Reserve* (ALR). However, ALC staff consider a 4 ha minimum permitted lot size in the AG zone as insufficient to be supportive of agriculture. Although there are many 4 ha parcels in the ALR in the region, it is recommended that the minimum lot size be increased to 8 ha, as parcels of 8 ha and larger are more likely to be used for agriculture, and would be more economically viable for agriculture (than 4 ha lots).

There are a significant number of smaller ALR parcels designated as SH - SmallHoldings which permits 1 ha lots, and only "limited" agriculture. This is to advise that any lands in the ALR have the right to pursue agriculture without limits on animal density or crop types. As such it is recommended that the SH - Small Holdings section be modified to delete the qualifying word – "limited". In addition although the SH designation permits 1 ha lots and other designations which affect the ALR also identify minimum lots sizes, nothing in this comment binds or commits the Agricultural Land Commission to subdividing the lands as recommended/permitted by the draft Bylaw.

It is noted that the draft Bylaw does not contain an ALR map. Although the ALR is mostly identified by the AG - Agriculture designation, there are other ALR lands which

are not designated for agriculture that should be identified as ALR. A separate ALR map will help ensure that plan readers are not mislead about whether their land is in the ALR, and that the ALC also has jurisdiction over land use and subdivision.

There are several properties on the Schedule B OCP Map near the Village of Keremeos which are designated *AI* - *Administrative Cultural and Institutional*; *CT* - *Commercial Tourist*. A review of airphotos indicates that these properties contain existing non-farm uses. It is anticipated that many of these non-farm uses predated the ALR, or the ALC approved them. ALC staff advise that non-farm uses which predate the ALR may continue without ALC authorization, provided they do not cease for 6 months. However, if the use ceases for 6 months and seeks to restart, or to expand the non-farm activities or facilities, ALC authorization is required through the ALC application process. If you have any questions, please contact the undersigned.

\*\*\*\*\*

The ALC strives to provide a detailed response to all bylaw referrals affecting the ALR; however, you are advised that the lack of a specific response by the ALC to any draft bylaw provisions cannot in any way be construed as confirmation regarding the consistency of the submission with the ALCA, the Regulations, or any Orders of the Commission.

This response does not relieve the owner or occupier of the responsibility to comply with applicable Acts, regulations, bylaws of the local government, and decisions and orders of any person or body having jurisdiction over the land under an enactment.

If you have any questions about the above comments, please contact the undersigned <u>martin.collins@gov.bc.ca</u>

Yours truly,

PROVINCIAL AGRICULTURAL LAND COMMISSION

Martin Willing

Martin Collins, Regional Planner

cc: Alison Fox, Ministry of Agriculture



## DEVELOPMENT SERVICES GENERAL COMMUNICATION

Your File #: Area G Official Community Plan eDAS File #: 2022-03162 Date: Jun/24/2022

Regional District Okanagan Similkameen 101 Martin Street Penticton, BC V2A 5J9

Attention: Chris Garrish, Planning Manager

## Re: Proposed Official Community Plan for Area "G": Electoral Area "G" Keremeos Rural, Hedley, and Olalia

The Ministry has no concerns or further comments to the proposed (DRAFT VERSION – June 1, 2022) Electoral Area "G" OCP Bylaw No. 2975, 2022.

If you have any questions, please contact Penticton Development Services at (250) 712-3660.

Regards,

Michell BE.

Mitch Benke Development Officer

Local District Address

Penticton Area Office 102 Industrial Place Penticton, BC V2A 7C8 Canada Phone: (250) 712-3660 Fax: (250) 490-2231

H1160-eDAS (2009/02)

### **Christopher Garrish**

From:	Benke, Mitch TRAN:EX <mitch.benke@gov.bc.ca></mitch.benke@gov.bc.ca>
Sent:	June 24, 2022 10:59 AM
То:	Christopher Garrish
Cc:	Garrison, Blaine TRAN:EX
Subject:	RDOS Area "G" (Keremeos Rural, Hedley, and Olalla) OCP Review
Attachments:	Draft Electoral Area 'G' OCP Bylaw No. 2975 (version - 2022-06-01).pdf

Hello Chris,

The Ministry has reviewed the Transportation Section 18.3 Policies, and has cross-referenced it with the last OCP review, for which the Ministry provided comments (Area "A"). The following policy of note has been carried over from the previously reviewed OCP. The Ministry's comments are in red.

18.3.6 Supports the closure of unused, unconstructed road right of ways, where such closures result in traffic pattern improvements and are not detrimental to the use of adjoining lands or planned infrastructure projects.

The Ministry must consider many factors regarding the closure of public road, either constructed or unconstructed. Under Section 60(1) of the Transportation Act, the Ministry may close all or part of a provincial public highway if that closure is in the public interest. In addition to considering access to adjacent properties, highway maintenance, stormwater drainage, utility infrastructure, and statutory requirements (such as access to lands beyond and access to water), the Ministry also may advertise the proposed closure to obtain comments from the public.

The draft Area "G" OCP Transportation Section, and associated policies, are generally in accordance with the Ministry's current policies and practices.

The Ministry does not have any major works planned in the Keremeos area, either in planning or for capital construction. The Ministry expects there may be some preservation works (paving, bridge rehab or replacement) at some point in the future, as fiscal budgetary funds are allocated. In addition, the Ministry will continue to monitor safety on our highway system, and address issues as they arise. The Ministry is also not aware of any changes to our provincial road designation through the Keremeos area.

### Regards,

Mitch Benke | Development Officer Ministry of Transportation & Infrastructure | Okanagan Shuswap District 102 Industrial Place, Penticton, BC V2A 7C8 Tel: 778-622-0105 | Cell: 250-809-8555 | Fax: 250-490-2231 Email: <u>Mitch.Benke@gov.bc.ca</u> Website: <u>Ministry Home</u> <u>Permit Application</u> <u>Subdivision Application</u> \*Please note that my office number has changed.

This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing or other use of this e-mail by persons or entities other than the addressee is prohibited. If you have received this e-mail in error, please contact the sender immediately and delete the material from any computer.



July 6, 2022

File: 0280-30 Local Government File: G2020.017

Nikita Kheterpal Regional District Okanagan Similkameen 101 Martin Street Penticton, B.C. V2A 5J9 Via E-mail: <u>planning@rdos.bc.ca</u>

Dear Nikita Kheterpal:

## Re: Regional District of Okanagan-Similkameen Electoral Area G OCP

Thank you for providing B.C. Ministry of Agriculture and Food (ministry) staff the opportunity to comment on the draft Official Community Plan Bylaw for Electoral Area 'G'. Overall ministry staff consider the objectives and policies affecting agriculture to be positive given the emphasis on protecting agricultural land and minimizing conflict. We offer the following comments that may help to provide increased clarity and suggestions for wording or additional objectives or polices that may support agriculture in the Regional District:

**Ministry name** – We note that the document uses 'Ministry of Agriculture' throughout for the ministry name. It is currently the 'Ministry of Agriculture and Food', so we recommend updating this throughout the document.

**5.2.4 Broad Goals** – Agriculture – the goal to support the existing agricultural activities in the Agricultural Land Reserve (ALR) is good, although it is unclear what 'character' and 'sense of place' mean. In addition, agriculture practices and activities can change rapidly in response to changing markets and available technologies. Therefore, the goal could be made stronger with the addition of 'and future' after 'existing'. The goal may also benefit from adding 'and maintaining and encouraging agricultural properties be of a size that will be viable for agriculture and preventing fragmentation of agricultural land' after 'economic base, character and sense of place'.

Mailing Address: Ste, 200 1690 Powick Road Kelowna BC V1X 7G5 **9.2 – Agriculture – Objectives** – The objectives in this section cover much of what is important to maintaining an agricultural industry. An additional benefit may be gained by including an objective of having 'agricultural land use consistent with provincial legislation'.

**9.3 – Agriculture – Policies** – The policies in this section are generally very strong and support the objectives of the Agriculture designation to protect the agricultural land base and to minimize conflicts. The policies in s.9.3.2 through 9.3.11 to discourage non-farm uses and fragmentation of farmland and to encourage new development adjacent to the agricultural areas to provide sufficient buffering should certainly help to minimize conflict. This section may also benefit from a statement that supports working with the Village of Keremeos to ensure that adequate buffering occurs where lands within their jurisdiction are adjacent to agricultural areas within RDOS Electoral Area 'G'.

**9.3.15** – This is a good policy but may benefit from adding 'and are in compliance with the *Agricultural Land Commission Act* and Regulations' to the end of the sentence for clarity. –

**9.3.19** – 'including the *Farm Practices Protection (Right to Farm) Act*' reads a bit strange. Perhaps 'in accordance with the *Farm Practices Protection (Right to Farm) Act*' would be better phrasing.

**9.3.20** – Policy (a) appears to be in conflict with Policy 9.3.2(a) with regard to supporting homesite severances. However, this policy states that the Board will support homesite severances that are in accordance with the ALC's homesite severance policy. Given that a requirement under this policy is that the property must have been the principal residence of the applicant as an owner-occupant since December 21, 1972, it is likely that few landowners will be able to meet this requirement, and therefore the OCP policy may have little impact on the agricultural land base in Area G. If the main distinction between Policy 9.3.2(a) and 9.3.20(a) is being able to meet the ALC homesite severance policy, this could potentially be clarified in one or both of these policies to reduce confusion.

**11.3.6 – Policies – General Residential** – Encouraging buffering is very positive in this designation. We recommend that the <u>Guide to Edge Planning</u> be specified here as the relevant guidelines from the Ministry of Agriculture and Food.

**11.5.4 Policies – Medium Density Residential** – Ministry staff note that, with appropriate buffering, medium density residential can be more compatible adjacent to agricultural lands than single family dwellings or rural residential lots. For example, it can be easier to

get proper buffering with a multi-family development rather than single family owners who may remove the buffers to improve views or reduce work.

If you have any questions, please contact us directly at the email addresses or numbers below.

Sincerely,

alin for

Alison Fox, P.Ag. Land Use Agrologist BC Ministry of Agriculture, Food and Fisheries Alison.Fox@gov.bc.ca (778) 666-0566

Philip Gyug, P.Ag Regional Agrologist B.C. Ministry of Agriculture, Food and Fisheries – Kelowna E-mail: Philip.Gyug@gov.bc.ca Office: (250) 378-0573

Email copy: Michael McBurnie, Regional Planner, Agricultural Land Commission <u>ALC.Referrals@gov.bc.ca</u>



July 15, 2022

Nikita Kheterpal Regional District of Okanagan-Similkameen 101 Martin Street Penticton, BC V2A 5J9

Dear Nikita Kheterpal:

Sent via email: planning@rdos.bc.ca

## RE: File G2020.017-ZONE: Draft Official Community Plan for Area G Bylaw No. 2975

Thank you for the opportunity to comment on the Regional District of Okanagan-Similkameen's (RDOS) Electoral Area G Draft Official Community Plan (OCP). Overall, we have found many policies that will support the health of the Area G population. However, we are concerned the implementation section is not as thorough as it could be to best achieve the vision and objectives. Below we offer suggestions and examples for strengthening the plan and bolstering implementation, as well as a list of policy specific suggestions.

### Healthy Built Environments Planning Principles:

The OCP presents an opportunity to improve the future health status of all residents by promoting healthy built environment principles. A healthy built environment (HBE) is planned and built in a way, which health evidence demonstrates has a positive impact on people's physical, mental and social health. Chronic diseases, such as diabetes, some cancers and cardiovascular disease, are largely preventable and are influenced by citizens' levels of physical activity and food security, which are influenced by community planning. The <u>HBE Linkages Toolkit</u> is an evidence based resource which links planning principles to health outcomes. Considering how Area G is designed and connected, how readily accessible healthy food options are, and how elements of the natural environment can be protected and incorporated into the community can all help to reduce chronic disease and support good physical, social and mental health.

In addition, including HBE principles in community planning has been shown to support health equity. Health *in*equity occurs when there are differences in health status between people or populations due to social, political and economic factors which influence day-to-day life. The BC Centre for Disease Control <u>Fact Sheet: Supporting Health Equity Through the Built Environment</u> describes the vision for healthy, equitable built environments as: "safe, attractive, and complete neighbourhoods that support equitable opportunities for social connections and food security, access to protected natural environments, as well as accessible options for public and active transportation and housing." An equity lens can be used to distribute services and resources in a way that benefits people that need them the most so that the outcome for all

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

# **Interior** Health



residents is more equal. Using an equity approach contributes to developing sustainable, resilient and healthy communities by more effectively and systematically addressing community well-being.

#### HBE Planning Principles in Area G OCP:

We are very pleased to see HBE planning principles included throughout the Area G OCP goals and policy statements. As such, the OCP provides the framework to achieve the vision of a sustainable community that supports active, healthy living in vibrant communities. For example, the first five goals and key priorities are healthy built environment planning principles:

- 1. Water resources. Protect and manage water resources, including both surface and groundwater...
- 2. **Infrastructure and services.** Improve and support the development of new or combined infrastructure, including community water, sanitary sewer systems and improved internet connectivity.
- 3. Natural hazards & Climate Change. Explore ways to reduce risks from natural hazards such as wildfire and flooding, and support adaptation and greenhouse gas reduction initiatives...
- Agriculture. Support the area's existing agricultural activity... and protect agricultural lands...
- 5. **Community health and wellbeing.** Promote community health, safety, and cleanliness. Support active living for the area's aging population and increase activities for youth.

Another example is directing residential growth within existing settlement areas where services already exist (Section 6.4). This increases economies of scale to pay for community utilities and amenities, and allows people to live closer to daily destinations, which supports physical activity, social well-being and greenhouse gas emission reduction. One last example is having strong healthy food system policies in Chapter 9.0 Agriculture that protect agriculture land and support local and regional food systems and food security. We support these policies and think that they have been very well written.

As mentioned, overall there are numerous policies included in this OCP that health research supports as being positive for the Area G population. The following are suggestions to further support population health, and achieve the vision and goals established by community members.

#### Protection of Water:

Protecting water resources is listed as the first broad goal and key priority in the OCP. The OCP includes objectives and policies that will protect water, for example directing development toward settlement areas and Resource Area objective 8.2.1 and the supporting policies "to conserve water resources and protect the quality and quantity of those resources". However, given protecting water resources is a high priority, we suggest being more explicit about water protection, and have it apply across all/most designations. For example, Section 3 Sustainability and Resilience of the recently adopted <u>Columbia Shuswap Regional</u> <u>District (CSRD) Area E OCP (Feb 2022)</u> includes several sections specific to protecting different aspects of water: Watershed and Aquatic Environments, Foreshore Environment and Groundwater and Soil Quality. This section also includes other aspects of community sustainability and resilience which may align with Area G goals, such as climate change, economic, housing and wildlife.

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INTERIOR HEALTH POPULATION HEALTH | 505 DOYLE AVE, KELOWNA, BC V1Y 0C5 PHONE 250,469.7070 ex. 12287 CELL 778-214-0674 EMAIL Tanya.Osborne@interiorhealth.ca

#### Apply Equity Lens:

We noted the projected demographic for Area G is a higher proportion of older adults – younger seniors that will age to be older seniors within the timespan of the plan. We suggest reviewing the plan policies again keeping in mind the needs of this specific population, and explicitly including language in policies that will support their need. For examples, in Section 11.3 Policies – General Residential consider including policies that support/encourage <u>Universal Design</u>, and Section 15.2.3 explicitly include the word 'accessibility' such that it reads "Improve and maintain public access *and accessibility* to parks and recreation resources" rather than just 'access'. Cariboo Regional District <u>Accessible Trails</u> are a great example of creating accessible spaces in rural settings that support people with mobility and cognitive challenges (age-in-place) to stay physically active, socially connected and be able to interact with nature, all of which health research has demonstrated support good mental health.

#### Tobacco/Vape Reduction Lens

Creating smoke-free environments in public spaces such as, parks, playgrounds, sports fields, beaches, public events, and 6 meters from a door, window or air intake, is another great way to support the health of Area G residents. Smoke-free outdoor spaces are highly effective in helping children and youth grow up to be non-smokers. These environments also support people who are trying to quit smoking. Communities with smoke-free bylaws have lower smoking rates, less toxic litter, less exposure to second-hand smoke and fewer wildfires. For these reasons we recommend including a policy(s) to create smoke-free environments.

#### Implementation:

It is important for OCPs to have strong implementation approaches in order to achieve the vision and goals, and that actions are monitored and evaluated. This is especially important for the Area G OCP given the earliest anticipated timeline to complete the next comprehensive review is in 18 years. We understand that "in general, the residents of Electoral Area "G" have expressed and interest to maintain a "minimal" level of regulation" (page 78). However, we are concerned the implementation section of the Area G OCP is not as thorough as it could be to successfully achieve the goals and objectives desired by community members. With this in mind we offer the following examples of ways to strengthen the implementation section.

The <u>CSRD Area E OCP</u> is for a rural setting similar in many ways to RDOS Area G, including preferring to have minimal regulations. However, they were receptive to including the following development permit areas (DPA) to guide development in a way that is aligned with their OCP.

Development Permit Areas	
Geohazard Development Permit Area	Download 43
Foreshore and Water Development Permit Area	Download @
Lakes 100m Development Permít Area	Download (9
Riparlan Areas Regulation (RAR) Development Permit Area	Download @
Malakwa Village Centre Form and Character Development Permit Area	Download (2)
Resort Lands Form and Character Development Permit Area	Download (2
Commercial Form and Character Development Permit Area	Download (3

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INTERIOR HEALTH DEPARTMENT | 505 DOYLE AVE, KELOWNA, BC V1Y 0C5 PHONE 250.469.7070 FAX 250.469.7068 EMAIL info@interiorhealth.ca The Lakes 100m DPA has been a successful water protection tool for guiding development in the CSRD on properties near surface water in areas where residents have not wanted zoning and building inspection.

Another suggestion and example to strengthen implementation is to explicitly establish an adaptive management approach similar to what is included in the City of Kamloops 2017 OCP <u>Implementation</u> <u>Chapter</u>, which in addition to planning and implementing includes monitoring, evaluating and amending the plan based on new knowledge. They developed an <u>Implementation Strategy</u> outside of their OCP to allow them to continually be able to identify actions to achieve their goals, and to be more nimble and adaptable.

In an addendum to this letter is a list of more policy specific comments for your consideration, as well as resources which we hope you will find useful.

Thank you for the opportunity to comment on your draft OCP. We welcome the opportunity to further our relationship with the RDOS by co-operatively identifying opportunities for collaboration and planning. Specifically, collaborating to protect drinking water, for climate change adaptation and resilience, developing smoke-free bylaws and for implementation. We are able to provide letters of support for funding opportunities, present HBE principles, participate in stakeholder working groups, and provide a health perspective on policy documents, such as a revised Zoning Bylaw, and land development proposals.

If you have any questions or concerns, please feel free to contact Tanya Osborne at 250-469-7070 x12287 or Tanya.Osborne@interiorhealth.ca.

Sincerely,

Tanya Osborne Community Health Facilitator Healthy Communities, Healthy Families

#### TO&AE/to&ae

A. Ely

Anita Ely, CPHI(C) Specialist Environmental Health Officer Healthy Communities, Healthy Families

c. Jered Dennis, Tobacco & Vapour Reduction Coordinator, Environmental Public Health Kristi Estergaard, Public Health Dietitian, Healthy Communities, Healthy Families

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### Addendum: Policy Specific Comments

#### **General Comments:**

- Section 3.5 speaks to the location of the closest hospital as either within the City of Penticton or the Town on Oliver. What about Princeton General Hospital?
- Sections 10.2.4 and 17.2.4 we encourage thinking about flood risk to the same extent that wildfire hazards are identified within the plan.

### Sustainable Housing including Water and Wastewater Servicing:

- We are pleased to see:
  - Support for community water and sewer systems, as well as improved internet connectivity. All can have a large impact on community health and well-being.
  - Minimum 1.0 hectare parcel for any sites that need to be serviced by *both* onsite water and sewerage.
    - Section 19.3.2.1 Please note this policy is more conservative than what is
      generally used as a guideline. Generally, 0.2 ha is used as the guideline minimum
      parcel size for parcels serviced by *either community* water <u>or</u> sewer (i.e. a mix of
      community and onsite services). We suggest considering whether establishing a
      minimum parcel size of less than 1 ha for parcels serviced by community water <u>or
      sewerage is better for balancing all needs of the community (e.g. affordable
      housing and infrastructure economies-of-scale as well).
      </u>
- We strongly advocate for long term sustainability and self-sufficiency of parcels that for parcels smaller than 2.0 ha primary and back-up areas for on-site septic are demonstrated (sections 11, 12, 13, and 14; 12.4.3b.) before development approval (e.g. subdivision, secondary/accessory suites and buildings).
- Policy 11.3.3 we suggest the addition of 'as long as have community servicing'.
- Policy 11.3.4 we suggest including 'universal design' in the text to support aging in place.
- Policy 11.3.9 we suggest also including "and demonstrate ability to be self sufficient in terms of onsite sewerage servicing". Also note the name of the current Provincial regulation is *Sewerage Systems Regulation*.
- Policy 11.4.4 we suggest including 'subject to servicing requirements' to ensure the sustainability.
- Policy 10.5 (Small Holdings) we suggest adding same wording as in policy 10.4.3 to further support diverse housing options.
- All residential development be located away from hazard lands, and suggest stronger language be used in policy 6.5.3. By minimizing potential interaction between humans and nature, a variety of stresses can be avoided (i.e. economic, mental and physical).
- Section 19.3.1.1 suggest using the word 'treatment' rather than 'disposal'.

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- Section 19.3.2.6 suggest using the term 'Authorized Persons under *Sewerage System Regulation*' rather than 'Registered Onsite Wastewater Practioners' to align with the more all-encompassing term used in the regulation.
- Section 19.3.2.6 the wording 'within close proximity' is vague... the Sewerage System Regulation (SSR) already sets out not closer than 30 m (100') unless a Professional can demonstrate locating less than 30 m will not create a health hazard. Is the intention of this policy to be more conservative than the SSR? An example of this is CSRD's Lakes 100m DPA which adds additional requirements for development in the 30 100 m distance from water.

#### Heritage Resources and Cultural Spaces:

- We are pleased to see the conservation of heritage resources.
- Objective 14.4.1 we encourage adding cultural spaces to this policy. Cultural spaces have
  important community value because they are often locations for community gatherings, which
  increase community wellbeing and resilience through increased social connection and sense of
  community belonging.

#### **Protecting Resources:**

- Policy 8.3.2 We are pleased to see support for maintaining Resource Area lands as un-subdivided large land parcels in order to maintain and reinforce agricultural capacity.
- We commend the use of FireSmart principals and all the Fire Management policies. The inclusion of advocacy efforts to increase Provincial fire rating requirements would be a further step to protect the community from fire hazards.
- Objective 16.3.1.5 encourages FireSmart approaches; however, there are no subsequent 16.3.2 Policies to support this objective.

#### Parks, Recreation and Trails:

- We suggest 'accessible' park space and trails is an important priority that should be included given large proportion of older adults;
  - Policy 15.3.12 Mentions universal access. Does this mean accessibility? If so, then we suggest this also be included in the objectives, and defined better.
- In alignment with Objectives 15.2.1, 15.2.2, 15.2.3 and 15.2.4, policies supporting signage and wayfinding would greatly benefit not only local residents but recreational tourism in the area. The integration of Syilx language traditional names would also contribute to filling Objective 14.4.1.4.
- Section 15 we suggest policies incorporate the importance of connections. Connectivity between trail networks enhances access to recreation and usefulness of the network enabling more people the opportunities to be physically active in their daily lives.
- We are very pleased to see the inclusion of policies such as 15.3.10, 15.3.11 and 15.3.12 as there are so many health benefits that can result from policies such as those.
- Policy 15.3.13 we suggest adding 'ability levels'.

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#### **Radon Gas:**

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- We are very pleased to see an entire section specific to radon mitigation.
  - We suggest adding to the introductory paragraphs about radon the following:
    - "As each building is unique the level of radon from one building to another can be quite different. Testing is the only way to know the concentration of radon that is present in any indoor space."
    - Suggest adding after hazard in second paragraph: "as it is the second highest cause of lung cancer after smoking,".

#### Implementation:

- Policy 13.3.4 speaks to reviewing and updating the 'Lands Potentially Suitable for Industrial Use within the Cawston, Keremeos and Headly Corridor (2002)'; however, this is not identified in the implementation section (22.6).
- 22.6 Introductory paragraph text of 1-3 years, 4-6 years and 7+ years does not match the headings in the subsequent table.
- Policy 23.1.14 we are pleased to see support for educating about climate change and health, and look forward to collaborating with RDOS to develop a Heat Alert Response System as well as other climate change resiliency initiatives.

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#### **Resources:**

Age-Friendly. Province of BC webpage about how to make a community more age-friendly. https://www2.gov.bc.ca/gov/content/family-social-supports/seniors/about-seniorsbc/seniors-related-initiatives/age-friendly-bc

Healthy Built Environment (HBE) Linkages Toolkit. PHSA. Highlights key HBE factors that influence health with reliable summary of health evidence. <u>http://www.bccdc.ca/health-professionals/professional-resources/healthy-built-environment-linkages-toolkit</u>

Heat Alert and Response Toolkit. Interior Health. Provides practical information and resources to assist in the development and implementation of systems and strategies to respond to extreme heat, specifically in rural communities. <u>https://www.interiorhealth.ca/sites/default/files/PDFS/heat-alert-response-planning-toolkit.pdf</u>

Improving Travel Options in Small and Rural Communities. Transport Canada. Guide to improve travel options for residents in small and rural communities.

https://data.fcm.ca/documents/tools/GMF/Transport\_Canada/ImprovingTravelSmallRural\_EN.pdf

Supporting Equity in Planning and Policy Action Guide. Plan H. <u>https://planh.ca/resources/action-guides/supporting-equity-planning-and-policy-action-guide</u>

Resources for Rural and Small Communities. Plan H. https://planh.ca/rural-resources

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RESPONSE SU	IMMARY					
AMENDMENT BYLAW NO. 2975						
<ul> <li>Approval Recommended for Reasons</li> <li>Outlined Below</li> </ul>	Interests Unaffected by Bylaw					
Approval Recommended Subject to Conditions Below	Approval Not Recommended Due to Reasons Outlined Below					
I SUPPORT THE AREA G	OCP BYLAW AS A					
STEP TOWANDS REGIONAL	CONTINUTY					
· ,						
1 0						
Signature:	Signed By: MANG COULSON					
Agency: VILLAGE OF KEREMEDS	Title: CHIEF AWMIN . OFFICER					
Date:						



OKANAGAN-SIMILKAMEEN Draft OCP Feedback Form

Name:\_\_\_\_\_\_

Please note your comments below and hand over the form to the project team:

LEAVE WELL ENDUCH ALONE, NOT INTERESTED IN MORE CONTROL OF THE GOVERNMENT BODY IN THE COMMUNITY, I VALUE LESS COVERNMENT AND MORE AUTONOMY,

<u>Contact Us</u> Tim Roberts Area Director, RDOS Electoral Area "G" <u>troberts@rdos.bc.ca</u>



Draft OCP Feedback Form

Name: \_\_\_

Please note your comments below and hand over the form to the project team:

DECAUSE O mobsar the noved here 5 om broken, don not 300 3000 take 310 201  $\cap$ 305 23 CNOU nG Know ThS 52. 2 58 2 COC 20/200 Sides

<u>Contact Us</u> Tim Roberts Area Director, RDOS Electoral Area "G" <u>troberts@rdos.bc.ca</u>



okanagan-SIMILKAMEEN Draft OCP Feedback Form

Name: DAVE SHEARER

Please note your comments below and hand over the form to the project team:

<u>Contact Us</u> Tim Roberts Area Director, RDOS Electoral Area "G" <u>troberts@rdos.bc.ca</u>



OKANAGAN-SIMILKAMEEN Draft OCP Feedback Form

Name: DAVID WAUGIT

Please note your comments below and hand over the form to the project team:

There Should be culverts on 3.A to save the few remaining Marmots Wastech Should take plass or sta home. ces on Area G BAN BIC 12

<u>Contact Us</u> Tim Roberts Area Director, RDOS Electoral Area "G" <u>troberts@rdos.bc.ca</u>



OKANAGAN-SIMILKAMEEN Draft OCP Feedback Form

Name: DUACAN BAYNEG

Please note your comments below and hand over the form to the project team:

I am an 85-year old Civil Engineer by
training who has spart most of my working life
in Agnialture.
In the very blessed similkameen, the biggest
chaltenge may be land use balance + Winerics can
occupy the sunny, gravely slopes while fruita
veggies utilize nich how land behind dykes.
It is velocite to accentrate uniqueness;
Similkameen valley a good example, with unproductive
steep hillsides protecting arable law land.
For elected officials it may be desirable to
controt type & vote of growth (Kelowna -fters an
example of 'out of contral where good productive
orchards ploughed under to be replaced with apartments)

#### Contact Us

Tim Roberts Area Director, RDOS Electoral Area "G" troberts@rdos.bc.ca

- Focus Group sessions COMPLETED SPRING 2022
- Community Open House Draft OCP ONGOING

# Get Involved

The Regional District wants to hear from you. Participate using the tools below. Check back often for updates and new activities. **Sign up to get project alerts and updates** by using the **Stay Informed** box on the right side.

FORUM	NEWS FEED	QUESTIONS	MAP		-	
Do you have	equestions?	Ask us.				
Ask us a question ar	nd one of our project	team members will	answer.			
Ask a question						
					Submit	
				Sea	rch	Q
making trai scooter etc. paved along the KVR etc the mountains wo get to the beach a Enforcement of by make great spots Should have it in y	Is and parks easier a trails would get the would be a "should uld be great. Too ma reas that should be rlaws for to many do for rodents-bylaw shour plan to consider	accessible for senior e senior off highway do"for your 10 year any farmers and orc open to public. To n ogs in one household hould limit some of t r making a beach sp	ok at the bigger pictu s who are in wheelch and be safer for all. I plan. Marked corrido hards have every thi hany think it is their I d. To much parking o this stuff left around ot with parking unde Boundary road -hav	hairs or Paved p or acces ng fend land an of junk, the bel er the re	baths, garbage can ss for hikers etc to ced off. Tough to e id not public. old vehicles etc-th rm and the pathwa ed bridge. Enforce	access wen ese ays. ment

past trees. Marilyn asked, 20 days ago

Thank you so much for your feedback, Marilyn!

#### **FILE NOTE**

August 23, 2022

### RE: Electoral Area "G" Official Community Plan Bylaw No. 2975, 2022 Public Comment

On August 21, 2022, Roger Mayer, resident of rural Keremeos noted that he would like supportive policy to be included in the "Agriculture" section of the OCP document regarding future residential/rural residential potential of his property, as previously discussed with RDOS planning staff in June 2022.

### Coordinator

From: Sent: To: Subject: Attachments: Nikita Kheterpal <nkheterpal@urbansystems.ca> August 23, 2022 12:41 PM Coordinator Fwd: Area G OCP image001.png

Kind regards, Nikita Kheterpal

From: Roger Mayer <rgrmayer@gmail.com> Sent: Sunday, August 21, 2022 12:00:01 PM To: Nikita Kheterpal <nkheterpal@urbansystems.ca> Cc: Christopher Garrish <cgarrish@rdos.bc.ca>; Tim Roberts RDOS Cell <troberts@rdos.bc.ca> Subject: Re: Area G OCP

#### CAUTION: External Email.

Nikita,

As per my previous discussion with Chris and my concern that the OCP is restricting the future use of my property at 2748 River Road. Chris suggested that there could be some wording that would mention the property as potential future development to address my concerns.

Has this been added in the existing version of the OCP?

Roger Mayer

On Thu., Aug. 4, 2022, 1:37 p.m. Nikita Kheterpal, <<u>nkheterpal@urbansystems.ca</u>> wrote:

Good afternoon Committee members,

Considering the wildfires affecting the communities in Electoral Area "G", as well as the latest Evacuation Order for Olalla, we would like to postpone the breakfast scheduled for tomorrow morning.

I will reach out again on behalf of Director Roberts to reschedule a thankyou meet-up with you all.

Hope you are all staying safe. Take care.

Regards,

#### Nikita Kheterpal

#### Community Planner

X

304-1353 Ellis Street | Kelowna, BC V1Y 1Z9

**t** 778-738-3657

w urbansystems.ca

From: Nikita Kheterpal Sent: Monday, July 25, 2022 9:17 AM To:

Cc: Christopher Garrish <<u>cgarrish@rdos.bc.ca</u>>; <u>troberts@rdos.bc.ca</u>; \_\_\_\_\_ Subject: Thank you - Area "G" OCP Citizens Committee [Filed 25 Jul 2022 09:17]

Good morning Citizen's Committee members,

I am writing this e-mail to thank you for your participation so far in the Electoral Area "G" Official Community Plan project and the time you took from your schedules to attend the various night meetings – both in-person and online. We also appreciate the feedback you shared with us on the draft OCP documents. Your support and insight into the community have been an integral part of the OCP development process.

To express our gratitude, Director Roberts would like to invite you all for breakfast at the <u>Tree to Me inn</u> on Friday, August 5 at 9:00 a.m.

If you could kindly RSVP for this invite, that would be appreciated.

Again, thank you for serving as an Advisory Citizen's Committee member for this project.

Kind regards,

#### Nikita Kheterpal Community Planner

### Regional District of Okanagan Similkameen - Area "G" Official Community Plan Public Hearing - August 23, 2022

Good afternoon. My name is Mel Kotyk, and live at 3046 10th Ave., Keremeos. My wife Janine and I are considered to live in the 'Rural Keremeos' area of this draft Official Community Plan. I am a Registered Professional Biologist by trade and have worked for government for most of my career, and have Chaired many Boards and Committees during that time. I was pleased to be a part of this important initiative and process.

In my professional capacity representing the Federal government negotiating Treaties with First Nations and the Province of B.C. I understand the importance of these types of documents and in particular the close attention needed to words and phrases to ensure clarity for future readers and decision makers.

On January 2, 2021, the RDOS Board of Directors appointed me as a member of the Electoral Area "G" Official Community Plan Project Citizens's Advisory Committee. Then at the inaugural meeting of the Citizens Advisory Committee I was appointed as Chair of the Committee. Since that time I have attended every Committee meeting and virtually every public meeting and event. It's been a long and arduous process.

Today, I come to speak to you outlining my own personal observations and perspectives and the Citizens Advisory Committee may respond at a later date.

The presentation at this Public Hearing will address three areas:

- 1) Comments regarding the process
- 2) Comments on this current draft of the Official Community Plan
- 3) Our recommendation to the RDOS Board.

### **Comments on the Process:**

- As mentioned above, the process has been long and arduous. There have been many meetings over a 20 month time period. We started out with the assistance of a consulting firm whose contract eventually ceased and we have had turn over in RDOS staff. There have been issues pertaining to getting information out to the residents of Area G, and numerous methods of communication were attempted - at times with limited success.
- There have been Town Hall meetings, Information Sessions, Coffee meetings, information mail-outs, and Focus Group meetings which provided information to the public. There has been a core group from the Citizens Advisory Committee that have attended virtually each meeting myself included.
- Up until relatively recently, despite the recent 'bumps in the road' the process was fairly productive, extensive, and much effort was exerted to obtain community feedback.

- Comments on community values and priorities have been provided at various junctures of the process. Some of these comments were provided verbally, some were via hand written notes on draft documents, others were via email. A number of comments were provided to RDOS staff subsequent to the development of the first draft of the Official Community Plan.
- Area G is a predominantly agricultural and rural community. A high percentage of residents are at the peak of their harvest during the end of summer and cannot take time away from their farms mid day at this critical time of year. This is also the height of tourist season with many wineries, restaurants, motels, etc running at full capacity. Being a seasonal industry, summer is not the time for residents to read, consider, and input into Public Hearing.
- More importantly, a key area within Area G Olalla- recently had to be evacuated due to the risk of wildfire. These residents were subjected to going to an Evacuation Reception Centre to seek temporary lodging, meal and clothing vouchers, and every day items such as personal hygiene products and toiletries. This was an extremely traumatic and emotionally charged time for these residents, being displaced, many sleeping in their vehicles for days on end, having very limited food to eat, and not knowing if they would have a home to return to. These residents need additional time to read, consider, and input in the the Public Hearing.
- Again, summer is not the time for Area G residents to read, consider, and participate in a Public Hearing process and especially under such extenuating circumstances as an evacuation due to wildfire. The Notice of Public Hearing clearly states that "No letter, report or representation from the public will be received after the conclusion of the public hearing". It is gratifying to hear that the Hearing process has been extended to September 19th.
- It's better to take the necessary time to get a document as important as an inaugural OCP right the first time. This is done by hearing and addressing each and every concern as best possible prior to 'locking in' a document.

### Comments on the draft OCP:

Although the OCP is subject to periodic amendments however it is <u>NOT</u> likely going to go through a comprehensive review for 20 years. As such the language, although relevant in 2022, needs to be written in a manner which anticipates changes two decades hence (e.g. housing, transportation, climate change, etc.). The document should attempt to remain relevant to those who are entering grade school today and not just suit current needs. **The OCP does <u>not</u> contain sufficient forward thinking language to address the future needs of the community** 

- In addition to the over arching Vision statement (pg 20), there are **12 Goals; 66 Objectives; and 229 individual Policies** articulated throughout the document. This volume of goals, objectives, and policy statements will undoubtably confuse and raise concerns amongst the Area G residents. The OCP needs to better describe what the communities priority is for each of the sections. In the absence of this clear articulation of priorities - no direction will be provided to RDOS and future decision makers.
- The Vision statement was drafted very early in process (spring 2021) prior to developing the other sections of the document, and although it may still generally be valid, recent events with respect to wildfires and evacuation of residents may impact what the overall Vision may look like. A second review of the OCP through the lens of the recent situation with respect to wildfires, and the flooding in November 2021 needs to occur prior to adoption.
- There would be benefit to highlight the 'vision' of residents for each specific sections. For example to link the Background, Objectives, and Policies statements within each Section there could be the following possible 'vision' or 'whereas' or 'therefore' statement:

#### Some possible examples:

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- Hedley (Section 7.3) there is a background section followed by 7 policy statements. A possible 'Vision' or 'Therefore' statement could be "For the duration of this OCP, supporting efforts of other jurisdictions to address safe drinking water, waste management issues, affordable housing, and encouraging local employment are key objectives for Area G residents". Then the seven policy statements will make sense.
- Resource Area (Section 8.0), the 'Vision' or 'Therefore" statement could be: "The beauty and unique character of the Similkameen River valley is what distinguishes this area from neighbouring communities and therefore preserving this uniqueness for future generation is a key goal for for the Area G residents". Then the subsequent policy statements make sense.
- Agriculture (Section 9.0), the 'vision' statement could be: "Agriculture is a mainstay for Area G and is recognized for its vital contribution to food security, jobs, and community well-being. The preservation and promotion of sustainable, eco-friendly, agricultural uses is an important value to Area G residents"
- Residential (Section 11.0), the 'vision' statement could be: "With the aging demographic of Area G, along with the need to provide affordable housing for new residents and seasonal workers, a mix of residential developments, that suit a changing environment, will be encouraged".
- o Etc

- The various sections are individually important, however how do they rank with respect to importance between them? As a communication tool for residents a Venn diagram showing how the various sections interplay with each other (e.g climate change with transportation; agriculture and growth management), and comparing relative importance between the sections would be very helpful.
- The map shows the areas being proposed for designation plus there are numerous references to the Agricultural Land Commission and their Reserved Lands, but there needs to be a map showing the differences between ALR lands and those designated as agricultural within this OCP. The absence of the ALR lands being shown will confuse the public as to which regulation applies to their particular parcel of land.
- The various Policy statements commence with the word "Support" e.g. 7.3.1.1 (e.g. "Supports improving water and sewer infrastructure within the Hedley community"). The word 'support' is a very passive word and can be interpreted as only being implemented if someone else takes the initiative and then the RDOS will 'support' that initiative. For the various key sections that are a high priority for Area G residents, the word 'should' could be replaced by 'Will advance', or 'will encourage' or 'will promote', etc, to indicate that these are areas in which resident wish to advance the initiative. The word 'encourages' is used elsewhere in the document and should be used in numerous other places. Therefore 7.3.1.1. would read "Will advance improving water and sewer infrastructure within the Hedley community").

Simply put, whether it be: the future potential for a trail system; addressing the mobility and access needs of an aging community via the old GNR pathway; responding to climate change and the increased risk for flooding, wildfires, drought; language to address drinking water issues in cooperation with the various other authorities; looking into sewage issues throughout Area G; or housing - the draft document is not forward thinking enough to guide future decision makers on what the community's Plan for Hedley, Olalla, or rural Keremeos over the possible 20 year life expectancy of this OCP needs to be clearly articulated.

#### In summary:

My role within the Citizens Advisory Committee resulted in dedicating numerous volunteer hours to hear from the public and contribute to the development of this draft Official Community Plan. My desire was, and remains, for a document that truly reflects the community's values and vision for the future, and for an 'Official Community Plan' that would be a useful guide for future decision makers. This commitment has not wavered.

However I am of the view that the current draft of the Official Community Plan does not adequately reflect these forward values of the community and requires further work prior to going to the Board for approval. The document is simply **not ready** to go forward.

### **Recommendation to the RDOS Board:**

Based on the information outlined above, it is my recommendation that prior to 3rd Reading by the Board that RDOS staff be directed to continue working with key community leaders to incorporate wording to address as many of the outstanding issues as possible before returning to the Board for adoption.

#### Lauri Feindell

bject:

FW: Draft Area G OCP

From: Ken Hoyle
Sent: August 24, 2022 2:01 PM
To: Nikita Kheterpal <<u>nkheterpal@rdos.bc.ca</u>>
Cc: Tim Roberts <<u>troberts@rdos.bc.ca</u>>;
Subject: FW: Draft Area G OCP

Good afternoon Nikita,

Thank you for your time yesterday regarding the latest version of the above dated 2022-07-18. I could not find this version on the RDOS website this morning. The previous version, 2022-06-24 version is still there. I did receive a hard copy of the latest draft for review yesterday and forward my comments of July 8<sup>th</sup> for your further consideration below with updates marked in red. I also did not receive copies of the schedules yesterday and also cannot not find them on the RDOS website and thus cannot comment on them but would like to. Can you share with me where and when if I will be able to access them? Pegards,

nen

From: Ken Hoyle
Sent: July 8, 2022 6:28 AM
To: Christopher Garrish <<u>cgarrish@rdos.bc.ca</u>>; Nikita Kheterpal <<u>nkheterpal@rdos.bc.ca</u>>
Cc: Tim Roberts <<u>troberts@rdos.bc.ca</u>>
Subject: Draft Area G OCP

Good Morning Nikita and Chris,

Thank you again for your time yesterday regarding the above. It is a very good plan. Thank you very much for your hard work on it. The following is a summary of the items that I believe are important to capture in the text and plans about Hedley, if they do not already exist in the draft.

#### Views

The views to the surrounding mountains are in part what makes Hedley special. There are, in almost all directions incredible views. These should be rotected as much as possible.

## Architecture

Hedley has some very unique architecture and should be considered as an experimental centre for small homes on tiny lots.

## **Compatible land use**

I encourage a statement about compatible land use. Excessive noise, odours, industrial uses not conducive to residential uses should be discouraged.

## **Districts**

Tourist and Commercial districts should be shown on the land use plan to emphasize and encourage a walkable tight village centre and discourage these uses in residential areas.

## Lanes

The lanes in Hedley play an important part in making it unique. They should be shown on the plan and a statements made about their ownership, their role in creating fire breaks, opportunities to walk in the village and to provide access to the rear of lots.

## USIB Lands (pg. 9)

I see Hedley & Chuchuwayha Reserve as one community with two components. I encourage a statement about land ownership and jurisdiction involved in the planning of these lands. Planning on one impacts the other. The draft encourages collaboration on pages 21, 27 and 47 which is excellent.

# **Aging Population**

A 25% increase in old people is significant (pg. 16) and will have a huge impact on the future needs of Hedley. Specifically housing, health care and recreation. I encourage stronger statements about this impact and possible actions taken to mitigate it.

# Trails

Trails (pg. 21, 49) can play a very important part of the future of Hedley for tourism, recreation and considerations for aging in place. Potential trail routes should be shown on the land use plans.

# Outdoor Storage (pg. 43)

Because Hedley has very small lots, a potential outdoor storage area (industrial use) should be shown on the draft plan.

# Small Lots

Hedley has very small lots (25'X100'). This is unique and should be emphasized. They could serve as an example of a more modest lifestyle and provide a basis for more affordable housing. Septic systems on these lots should not be discouraged. There is 200 ft of gravel under them.

### *uietness*

Hedley is quiet and should be recognized in the plan. It is hard to find a quiet place to live with increasing densities in our cities. At rush hour in Hedley (two cars) I can still hear the birds.

### **OCP Updates** (pg. 5)

I suggest a statement about incremental updates be made between the major plan reviews. I like the revisions to the statement.

### **Plans (Schedules)**

Separate  $(81/2^{"} \times 11^{"})$  plans of Hedley should be included in the OCP for clarity.

### Administrative, Cultural and Institutional Uses (Schedule B)

It is unclear to me what these are. Some seem to be in strange locations on the plan. Examples of or clarification of these would be helpful.

### **Bolder OCP (pg. 19)**

encourage the OCP to be bolder. Hedley warrants it. Please reconsider customizing the OCP to recognize Hedley's unique valued characteristics.

I trust the above comments are helpful. If you have any questions about them do not hesitate to contact me. Thank you again for your time and hard work in this.

Kindest regards, Ken

Do NOT support adaptation and grein house gis reduction. 2. No huitage soles in Otaila - an attractions 10 ? Multimodal? transportation 12. We do not support "Affordable thousing" in theferm 12. We do not support "Affordable thousing "in theferm 13. We do not support "Affordable thousing "in theferm 14. Page 30 - what in that ives "encourage" residents to 15.2 page 31. Is wild life contward appearance of properties? 3.2 page 31. It responsible out door recreation? motorized vehicles Pige (2 Wild Are Management Policies 17:6.1.1.e) a) - 1) - 1 proposes an investigation into the mealigence of forestry and fire fighters that allowed the July 29 Wild fire to grow without restraint when water bombers and aircraft were available to place fire retardant far saved, somuch more valuable timber, livestock, aild life, and would not have enclangened personal property and life of local residents. Page 50 - WE DO NOT Support NATIONAL PARK !!! Dage 20 5.2 #2 we don't want more infrastructure #3 we are not a high producer of greenhouse gases threafore we Keep your madon gas rules to yourself. NO building and actes of forest lands, destruction of the provincis The Local Government Act" is behind the push to form "Ofidial Community Hans" for all the RDOS "Ireas" best tourism asset,

reduch age 27 - NO ONE from this community duction, We did NOT ask for this in air communit is to adopt Energy Step Code any ANY We do NOT Energy Step Code any ANY histolium code. THIS is ALL 

# Recommendations for Edits to: Area "G" Official Community Plan Draft version – 2022-07-18 Submitted September 20, 2022

Note: In Section 2.2, page 6, last sentence on the page it reads: **"The Citizens Committee made a final recommendation to the Board for approval and adoption of the Draft Plan"**. Please note that the Citizens Advisory Committee has <u>NOT</u> made a final recommendation to the Board for approval and adoption of the Draft Plan.

Note: new wording that is proposed to be inserted are identified by *italics* 

Section	Page #	Sub- Proposed Edit or Insertion Section	
4.0 OCP Designations	19		At the end of the page add the following statement: <i>"It should be noted that some provincial agencies</i> <i>(e.g. Agricultural Land Commission) may apply</i> <i>different land use designations and should be</i> <i>consulted)."</i>
5.0 Vision & Broad Goals	21	5.2.7	Edit the definition to read: " <b>Collaboration</b> . Continue engaging with Upper and Lower Similkameen Indian Bands, <i>and other jurisdictions</i> , on matters that affect all communities within Electoral Area "G"." [emphasis added]
6.0 Growth Mgmt	23	6.3	At the end of the section add the following: " <b>Therefore</b> , in collaboration with adjoining jurisdictions, implement a Growth Management Strategy that meets the needs of current, and future, residents of Area "G"."
		6.4.2	Edit the sentence to read: "Support new development where services currently exist, or are able to be, in keeping with this OCP's broad goals and objectives."
		6.5.4	Edit the sentence to read: "Requires that all new parcels less than 1.0 hectare in size to either connect to a community sewer and water system, where available, or be in accordance to the requirements of a Provincial Approving Officer."

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7.0 Local Area Policies	26	7.2	At the end of the section add the following: "Therefore the Local Area Policy for rural Keremeos supports working in collaboration with the Village of Keremeos, the Keremeos Irrigation District, and provincial agencies in providing mutual services."
	28	7.3	At the end of the section add the following: <b>"Therefore</b> the Local Area Plan for Hedley supports improvements to safety (e.g. protection from fires), infrastructure (e.g. water and sewer) and other various services needed for a retirement community.
	30	7.4	At the end of the section add the following: "Therefore the Local Area Plan supports improvements to safety (e.g. protection from fires and flooding) and the infrastructure required for an affordable bedroom community."
8.0 Resource Area	31	8.1	At the end of the section add the following: "Therefore the beauty and unique rural character of the Similkameen River valley is recognized by the Regional Board as distinguishing this area from neighbouring communities and therefore preserving this uniqueness for future generations is encouraged."
9.0 Agriculture	33	9.1	At the end of the section add the following: "Therefore the Regional Board recognizes that agriculture is a vital contributor to local food security, jobs, and community well-being and that the preservation and promotion of sustainable, eco- friendly, agricultural uses should be encouraged."
10.0 Rural Holdings	36	10.1	At the end of the section add the following: <b>"Therefore</b> the Regional Board recognizes that maintaining the Plan Area's rural character is a key goal and is encouraged to be retained in consideration of the historical agricultural heritage and natural environments."
11.0 Residential	38	11.1	At the end of the section add the following: "Therefore the Regional Board recognizes the value of Low Density and Medium Density Residential housing within the Plan Area and supports the accommodation of these various types of housing whilst maintaining the broader values of the Area."
12.0 Commercial	41	12.1	At the end of the section add the following: "Therefore the Regional Board recognizes that collaborative efforts with neighbouring communities

			are required to meet the commercial elements necessary for residents in the Plan Area."
13.0 Industrial	43	13.1	At the end of the section add the following: "Therefore the Regional Board recognizes that collaborative efforts with neighbouring communities are required to meet the larger industrial activities necessary for residents in the Plan Area."
14.0 Admin, Cultural, Institutional	44	14.1	At the end of the section add the following: "Therefore the Regional Board recognizes that collaborative efforts with neighbouring communities are required to meet the administrative, cultural, and institutional needs necessary for residents in the Plan Area."
15.0 Parks, Recreation & Trails	50	15.1	At the end of the section add the following: " <b>Therefore</b> the Regional Board recognizes the importance of parks and trails for enjoyment, present and future use, and for tourism purposes".
		15.2.6	Add at the end of this section the following: "encourage the utilization of the GNR in rural Keremeos as an alternate walking or wheelchair accessibility corridor for accessing health and other services in the Village of Keremeos". [Note: the intent is to allow motorized wheelchairs to get off Hwy #3]
	51	15.3.16	Add the following clause: "Given the Cultural and Heritage designation of the Red Bridge and the high community use associated with the natural beaches in this area will consider establishing a Community Park at this location."
16.0 Natural Environment & Conservation	54	16.1	3 <sup>rd</sup> paragraph "ranked high or very high" This sentence needs more specificity i.e. do you mean high in elevation? High in sensitivity? High in biodiversity???
	54	16.1.1.1	The sentence should read: "by encouraging the <i>protection and</i> enhancement of ecological systems"
	54	16.1.1.1	The sentence should read: "of containing and controlling noxious and invasive weeds through the continued"
	54	16.1.2.3	The sentence should read: "Supports the incorporations of <i>Indigenous</i> traditional ecological knowledge"

	55	16.2	The first sentence should read: "Riparian areas are places under the influence of water and are protected under the BC Fish Protection Act."
	55	16.2	The third paragraph should read: "Activities within riparian areas have potential to impact water quality, affect erosion, damage fish habitat and impact habitat for threatened or endangered species and any proposed activity requires Qualified Professional to be consulted". [Note: this is a requirement under provincial legislation]
	55	16.2	At the end of the section add the following: "Therefore the Regional Board recognizes the importance of protecting key natural habitats, wildlife corridors and riparian areas and also the value in enhancing areas where species at risk inhabit and these measures are to be encouraged."
	58	16.4	Note: The Conservation Area designation on the Schedule "B" should include the corridors along riparian areas of the Similkameen and Ashnola Rivers and Keremeos Creek.
17.0 Hazard Lands	59	17.1	At the end of the section add the following: " <b>Therefore</b> the Regional Board recognizes the risks associated with flooding, wildfires, slides, and debris flows on the Plan Area and supports and encourages measures necessary for the protection of residents and their property."
	60	17.5	Second sentence should read: "Land development for these communities within the floodplains, and the sporadic nature of 'orphaned dikes' situated on private lands has put them at risk of flooding…"
18.0 Transportation	64	18.1	At the end of the section add the following: " <b>Therefore</b> the Regional Board recognizes that in an area as vast as this Plan Area that effective, efficient, and environmentally sensitive transportation is a key consideration in land use management decisions."
	64	18.2.2	Should read: "Provide for safe and convenient pedestrian and bicycle access to schools, parks, <i>and services</i> , throughout all Plan Area communities."
	64	18.2.4	Should read: "Provide a multi-modal transportation system and secure trail network for various forms of transport, including pedestrians <i>of all ages and</i> <i>mobility,</i> and bicycles

19.0 Infrastructure & Servicing	66	19.1	At the end of the section add the following: "Therefore the Regional Board recognizes that collaboration with other levels of government is required in order to provide the infrastructure and servicing to a vast area. The Regional Board also recognizes that site specific, and innovative, infrastructure and servicing may be required when long distances, or lack of pre-existing infrastructure, is present."
	68	19.3	The second sentence should read: "Individual septic systems using traditional Level 1 technologies are not viewed as a long-term suitable method"
	68	19.3.1.1	Should read: "Establish long-term sustainable sewage collection, disposal, and treatment methods using, where appropriate, innovative technologies acceptable to the Provincial Authorizing Officer."
20.0 Aggregate & Mineral Resources	73	20.1	At the end of the section add the following: "Therefore the Regional Board recognizes the need to work in collaboration with provincial regulatory agencies."
21.0 Climate Change and Adaptation	77	20.1	At the end of the section add the following: " <b>Therefore</b> the Regional Board recognizes there is a contribution that the RDOS and this OCP can have in addressing climate change through encouragement of reductions in GHG through housing, infrastructure, transportation, waste management, and the protection of natural habitats."
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Mel Kotyk, R.P.Bio., Citizens Advisory Committee Member and Chair

Dr. Gerald Partridge, Citizens Advisory Committee Member

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TRISHA Mills CITIZENS Advisory Committee MENber

CINDY REGIER, CITTEENS Advisory COMMITTEE MEMber