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File: MNC Referrals

Rob Conway MCIP, RPP
Director of Planning
Municipality of North Cowichan
7030 Trans-Canada Highway
DUNCAN, BC V9L 3X4

Dear Mr. Conway,

**Re: Municipality of North Cowichan Zoning Amendment Bylaw 3761
Vancouver Island Motorsport Circuit**

Thank you for referring Bylaw 3761 to the Cowichan Valley Regional District (CVRD) for comment. The CVRD Board has directed staff to provide technical comments concerning the proposed amendment bylaw and staff from the CVRD Community Planning, Economic Development and Environment Divisions respectfully offer the following:

Local Planning Context

The Vancouver Island Motorsport Circuit (VIMC) site is located in the Municipality of North Cowichan (MNC) and current zoning [Industrial Heavy Zone (I2) and Commercial Rural Recreation Zone (C8)] permits a variety of uses. The rezoning proposal would accommodate an expanded track and associated facilities predominantly on the parcel currently zoned I2.

The site is adjacent to CVRD Electoral Area E – Cowichan Station/Sahtlam/Glenora. The Cowichan-Koksilah Official Community Plan (1994) characterizes the plan area as predominantly rural residential and resource-based, with plan goals to preserve rural agricultural character, encourage sustainable forest and mineral resources, and protect environmentally sensitive aquatic and natural resources. Over the past 25 years since the plan's inception, the prevalence of forestry and related industry has decreased while the Sahtlam area has become increasingly rural residential in nature. Given the lack of congruency between the rural residential character of the Sahtlam area and more industrial nature of the VIMC site, MNC is encouraged to consider available opportunities to mitigate potential land use, noise and nuisance related impacts on Electoral Area E - Sahtlam residents.

Regional Context

In the absence of a Regional Growth Strategy, Cowichan 2050 provides a framework for collaborative decision making to address issues and opportunities of regional significance: growth management, climate adaptation, ecosystem stewardship and biodiversity conservation, watershed management, transportation and reconciliation. A cursory review of VIMC application materials suggests that many of these topics have been or are currently being contemplated through the rezoning process. CVRD staff offer the following specific comments regarding the potential impacts of the VIMC proposal from regional environmental and economic perspectives:

Environmental Considerations

Menzies Creek is a sensitive watercourse, possibly fish-bearing, and reducing the number of crossings of the track and other access roads would be beneficial. Further, where crossings are unavoidable, bridging would be preferable to culverting. Proposed adjustment to the creek crossings is positive as is the increased value of storm water attenuation proposed outside streamside protection enhancement areas.

CVRD staff note that there are surface water quality issues and a lack of long term monitoring, particularly related to control of metals and hydrocarbons, across the region. There is a particular concern, in this case, with potential impacts to the Menzies Creek system from routine track facility operations, spill management during fueling, and accidents. Ongoing water quality monitoring downstream is recommended along with public reporting of water quality data.

CVRD staff also note the trend toward declining avian and amphibian populations across the region and potential for further water resource and biodiversity impacts resulting from the removal of forest and early seral vegetation. Consideration for such values could be addressed through appropriate landscape - habitat planning and species selection, habitat banking or compensation, invasive species removal and avoidance of pesticides.

Commitments to support recreational activities on adjacent Mt. Prevost are notable and supported, however, additional substantial public pressure on sensitive ecological environments should be considered with mitigation strategies developed.

Lastly, given increasing climate-related concerns, it may be advantageous to consider the potential direct and indirect impacts of the VIMC facility on greenhouse gas emissions (GHG). It is recommended that potential GHG impacts be assessed and opportunities explored to reduce or offset such impacts.

Economic Considerations

The Cowichan Industrial Land Use Strategy, completed earlier this year, identified an acute shortage of industrial land in the Cowichan Region, with only 0.44% of the total area zoned and designated industrial land. The report noted: *the need to manage, develop and expand the footprint of key employment lands must be a critical priority for local government if the diversification of our local employment base is to continue.* A key recommendation of this strategy was to *Discourage the conversion of appropriately zoned industrial land to non-industrial uses.*

The report also identifies the need to *Research, Promote and Identify New Locations for Industry Clusters*.

The Economic Development Cowichan 2018-2022 Strategic Plan notes, *The landscape of sector activity is changing in the Cowichan. Traditional sectors are in transition and new opportunities are emerging that will diversify and strengthen the regional economy, provide well-paying jobs, opportunities for new investment as well as the retention and attraction of skilled workers.*

It is expected that the proposed development of the VIMC facility would present new opportunities to support business retention and expansion, particularly in the tourism sector. Moreover, a unique opportunity exists to utilize the VIMC facility for research and testing of new vehicle technology, zero-emission vehicles and automated vehicles, which could contribute to further regional economic diversification and expansion of the technology sector – an emerging sector in the region. Please visit: <https://www.tc.gc.ca/en/services/road/innovative-technologies.html> for further information.

Building on this, and in order to mitigate the loss of industrial land, it may be wise to consider whether there is an opportunity for VIMC to incorporate the development of serviced industrial lands as part of the proposed development.

Thanks to North Cowichan Council and your Planning staff for the opportunity to comment on proposed Bylaw 3761 and we wish Council well in its deliberations.

Yours truly,

A handwritten signature in black ink, appearing to read 'Ann Kjerulf', written in a cursive style.

Ann Kjerulf, MCIP, RPP
General Manager
Land Use Services Department

AK/sb

cc: CVRD Board of Directors
Brian Carruthers, CAO