

Kris Belanger

From: [REDACTED]
Sent: July 4, 2019 5:00 PM
To: Kris Belanger
Subject: Lake Windermere DRAFT OCP Comment

Dear Mr. Belanger, Ms. Clovechok, and the RDEK Board,

I am writing to voice my concerns about the draft Lake Windermere Official Community Plan where numerous sections allow for greater development on the west side of Lake Windermere.

This draft OCP starts by outlining the many reasons that this area is biologically diverse, culturally important, and critically endangered. Unfortunately, it goes on to contradict these values, and allows for developers to interpret the plan to suit their wishes.

The plan never states that there is community demand for this type of development, instead stating in Section 4.1 "Throughout the planning process, residents and non-residents expressed a desire to see infill development or new construction adjacent to existing residential nodes. Infill housing options such as secondary suites are seen as one opportunity to potentially increase the availability of rental housing stock in the area without the need to develop and service bare land."

Section 19.3 (7)(c)(ii) states that "If development is proposed within grassland ecosystem areas a compact development footprint should be utilized to minimize negative impacts to existing grasslands." This opens the door to development in grassland environments that will effectively destroy the unique and critically endangered grassland environment we have in our region.

In Section 6.3 (1)(b) agricultural land is made vulnerable through the highly interpretable statement, "Fragmentation or parcelization of agricultural lands in the plan area is generally not supported." Thus it seems that exceptions will be allowed, with no parameters around what constitutes a worthy exception.

If the best way to reduce human-wildlife conflicts is to avoid development within wildlife corridors, and Section 11.1 (3)(f) states that "Future land uses should promote habitat connectivity and discourage fragmentation of contiguous ecosystems and ecosystem components..." then any development in wildlife corridors or fragmentation of this ecosystem should be denied. Local education programs such as Wildsafe BC should not be relied on to provide temporary solutions to a problem that could have been avoided in the first place.

An International Union for Conservation of Nature (IUCN) threat assessment of mountain goats in 2015 identified that the highest threat was human intrusions and disturbance. Road building near mountain goat habitat allowing predators and hunters easier access was also identified as a risk (B.C. Conservation Data Centre. 2015. Conservation Status Report: *Oreamnos americanus*. B.C. Minist. of Environment.). Thus the permissive language in Section 19.3 (7)(d)(iv & v) that allows for development near mountain goat habitat would undoubtedly negatively affect our local mountain goat populations.

Reading that "rezoning may be supported in this area if the proponent can demonstrate how development impacts, traffic concerns and existing recreational potential is maintained and enhanced..." Section 4.3 (5)c suggests that open space recreation and trails development is a possibility. There exist many recreational opportunities on the west side of the lake, none of which require rezoning and residential development.

Thus the Official Community Plan needs the following:

- a) Housing policies that encourage residential development that meets the needs of the emerging workforce and families in the region, while also taking into consideration that not all residents are homeowners. Also consideration needs to be placed on the fact that there is a devastating housing crisis making it almost impossible to find a place to rent affordably in Invermere.
- b) Policies that strongly discourage development in grassland ecosystems and further outline that human development within the plan area must not result in a net negative loss of the existing grasslands.
- c) An agricultural land use policy that does not support fragmentation or parcelization of agricultural lands in the plan area. Developers should be required to go through a series of stringent steps including an agricultural consultation as well as public review and consultations.
- d) Policies that do not allow “intensive development” in wildlife corridors but instead put great value on sustaining biodiversity by leaving wildlife corridors and habitat areas untouched by development.
- e) Policies that recognize the significant value of southern populations of mountain goats by prohibiting development in mountain goat habitat.
- f) A section highlighting the existing and well-used conservation based recreational opportunities available on the west side of Lake Windermere, including Windermere Lake Provincial Park and trails on land provided by the Nature Conservancy of Canada, the Nature Trust, and SRL.

As a concerned member of the community, I applaud your efforts to review the Lake Windermere Official Community Plan and I hope the results of this will bring forward better protections for the west side of Lake Windermere. We must value our communities, ecosystems, wildlife and future generations over short-sighted development.

Thank you,



Invermere, BC V0A1K0
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