

Monday, Oct 3, 2022

Subject: DL2394 – Request by residents to reject OCP amendment and rezoning application

To: <Yuli.Siao@scrd.ca>, Shane Walkey <shane.walkey@scrd.ca>

Cc: <Ian.Hall@scrd.ca>, Remko Rosenboom <remko.rosenboom@scrd.ca>, Lori Pratt <Lori.Pratt@scrd.ca>, <planning@scrd.ca>, <infrastructure@scrd.ca>

From: Truman Road Community <square.bay.community@gmail.com>

Dear Yuli and Shane,

As you consider the OCP amendment and rezoning application for DL2394 in Halfmoon Bay, we would like to reiterate our serious concerns regarding the possibility of higher-density housing upslope from the existing neighborhood (see also attached emails to SCRD of 4 May and 15 August 2022, as well as community inputs to the [Public Engagement Report](#)).

Please note that the signatories to this email participated in the public information session in April 2022 and have read the [developer's technical reports](#) as posted at the date of this email. We consider these technical reports to have gaps and weaknesses, to the detriment of the neighborhood.

We request that you recommend to the Board to reject the OCP amendment and rezoning application for this 17-acre upslope lot for the reasons listed below.

Your research will show that the lot was twice rezoned to lower density in our OCPs (currently zoned as residential C) and its *Residential Capability* designated as 'Least Satisfactory' in the 2009 OCP (Schedule A1) for good reasons. These are even more valid as we experience the compounding impacts of extreme weather events.

(1) Unsuitable sewage options to accommodate higher density housing:

Approval of the developer's first option of a second wastewater treatment plant to service DL2394 would be a major deviation from the [Halfmoon Bay Liquid Waste Management Plan \(LWMP\) \(2006\)](#). Any plant expansion which results in an increased outfall into the ocean would contradict the intent of the LWMP to restrict new outfalls and ocean discharges. In addition, *given that the existing plant sometimes exceeds its permitted discharge limits due to infiltration and that there is no agreed and funded plan to address these problems, it would be unacceptable to the community to upzone for a significant number of new users.*

The developer has proposed 2 other options of putting land-based sewage plants and absorption fields on DL2394. While these would potentially comply with the LWMP, they represent worst-case scenarios for the existing community. Given the fractured bedrock exposed on DL2394, a feature overlooked in the LWMP, the potential for the discharge from absorption fields to seep through the fissures, pollute groundwater and reappear downslope on neighboring properties is a serious concern. Note that this is not a hypothetical scenario - such flows now regularly occur during the rainy season in multiple locations, many below existing houses. This would be especially worrying if the sewage plants and absorption fields were to be privately managed. *It is the downslope neighborhood which would unwillingly bear the risk and potentially the cost if something goes wrong with this high-risk location.*

(2) **Environmental impact:** The developer proposes to remove most of the trees on DL2394 to construct higher density housing, with a view to forming a fire-resistant swath of land. This is remarkable in an area that is inside the Coastal Douglas-fir bio geoclimatic zone (CDF zone). The Halfmoon Bay Environmental Society has raised serious concerns that high-density proposals are not compatible with the surrounding environment. The area is a designated Old Growth Management Area, and described as “one of the largest, intact Coastal Douglas Fir zone forests remaining on the Sunshine Coast” (Land for Nature, 1997). As a member of [The Coastal Douglas-fir and Associated Ecosystems Conservation Partnership \(CDFCP\)](#), the SCR D signed on to a [Statement of Cooperation](#). Among other things, this commits the SCR D to “cooperation and partnership for conservation of Coastal Douglas-fir and Associated Ecosystems”. *The community is requesting that the SCR D act in the spirit of this commitment.*

(3) **High risk of stormwater runoff damage to existing houses and infrastructure:** The compounding impacts of the 2021 extreme weather events show the increased risk of clear-cutting the upslope forest and further fracturing the bedrock as construction takes place. DL2394 is immediately adjacent to 16 houses, and upslope from Truman Road and ~ 60 more houses. Given the heavy stormwater runoff that the neighborhood already experiences, including through the fractured bedrock into existing homes, our assessment is that the land alteration and construction related to higher-density housing would dramatically compound this. We view the risk to be high to existing downslope housing and public infrastructure. *We therefore request that the wider impact on the neighborhood and infrastructure be explicitly addressed by independent technical experts in terms of risk, mitigation, and liabilities.*

(4) **Keep Halfmoon Bay rural in line with our OCP:** The OCP clearly lays out the community vision to preserve the rural nature of Halfmoon Bay, consistently promoting larger lots and limiting the urban-sized subdivisions that sprawled in the 1970/80s. The first goal of the OCP is to 'maintain the rural characteristics of the area, reinforced by the low-density community'. An amendment to the OCP to change a low-density lot to a higher density strikes at the core of this vision – particularly when the change is in an unsuitable location and motivated primarily by a developer's financial gain. If approved, this would be the first higher density zoning in Halfmoon Bay since the first OCP in 1990 and would set a precedent with ramifications for future development across the community.

(5) **Public amenities are not in place for higher density:** The Truman Road area is not a designated community hub, is far from the highway, and not well serviced by public transportation, schools and other amenities. Additional higher density zoning along Truman Road would also raise public safety concerns with the neighborhood's lack of sidewalks, narrow (and at places substandard) roads, and limited visibility.

Based on the above concerns, and in a scenario where the SCRCD may allow the OCP amendment and upzoning proposal to move forward, **we request that you commission independent expert opinions on the hydrogeological and environmental impacts (including risks and mitigation) on the wider neighborhood of higher-density housing on DL2394.**

Signed by:

(11 residents of Truman Road area, contact square.bay.community@gmail.com for more details)