
TO: Agricultural Advisory Committee **DATE:** September 21, 2018
FROM: Stephen Boogaards
Planner **FILE:** PL2018-106
SUBJECT: Request for Comment on Subdivision in the Agricultural Land Reserve
Application No. PL2018-106
2298 Northwest Bay Road – Electoral Area E
Lot 1, District Lot 62, Nanoose District, Plan 37368

SUMMARY

This is an application for subdivision in the Agricultural Land Reserve (ALR) to allow a two lot subdivision on a 9.7 hectare parcel located in Electoral Area E. Should the Agricultural Advisory Committee (AAC) wish to provide comments to the provincial Agricultural Land Commission (ALC), it may do so by considering the adoption of a motion. Any comments provided by the Committee will be provided to the ALC, along with a copy of this report to assist the ALC in making a decision on this application.

BACKGROUND

The Regional District of Nanaimo (RDN) has received an application for subdivision use in the ALR from YourLand Development and Research Solutions on behalf of Glenn Dawson. The subject property is legally described as Lot 1, District Lot 62, Nanoose District, Plan 37368 and the civic address is 2298 Northwest Bay Road. The subject property is approximately 9.7 hectares in area and is located entirely within the ALR. A small portion of the property fronts on Northwest Bay Road to the north and Spurs Place to the south. The property is located to the east of a plant nursery and is surrounded by other rural and agricultural properties. Properties to the east, west and south are all within the ALR. The property currently contains a dwelling unit and the property owner currently operates a tree farm (see Attachments 1 and 2 for Subject Property Map and Aerial Photo).

The applicant proposes to subdivide the property along the railway line to create a parcel that is 0.6 hectares and a 9.1 hectare remainder. The proposal will also include the construction of a portion of Spurs Place to access the new lot.

A copy of the applicant's submission package is included as Attachment 10. Personal Information is redacted in accordance with the *Freedom of Information and Protection of Privacy Act*.

The AAC previously considered an application to subdivide the property into a 7.35 hectare lot (Lot A) and a 2.38 hectare lot (Lot B) in May 26, 2017. The application to subdivide in the ALR was refused by the ALC.

Given the AAC's site visit to the property for the previous application, a site visit was waived for the current application.

REGIONAL GROWTH STRATEGY

The subject property is currently designated Resource Land and Open Spaces pursuant to the "Regional District of Nanaimo Regional Growth Strategy Bylaw No. 1615, 2011" (RGS). The Resource Lands and Open Spaces designation does not support the creation of new parcels that are smaller than the size supported by the Official Community Plan (OCP) in effect at the date of the adoption of the RGS (see Attachment 7). Further to this, the RGS encourages the provincial government to protect and preserve the agricultural land base through the ALR. The RGS also discourages the subdivision of agricultural lands (see Attachments 8 and 9 for Regional Growth Strategy designation and Food Security goal).

OFFICIAL COMMUNITY PLAN

The subject property is currently designated as Resource Lands within the ALR pursuant to the "Regional District of Nanaimo Nanoose Bay Official Community Plan Bylaw No. 1400, 2005" (see Attachment 6 for OCP Land Use Designation). The Resource Lands designation includes an objective to protect agricultural land resources for present and future food production and supports a minimum parcel size of 8.0 hectares for land within the ALR. The policies identify that the retention of large land holdings within the ALR shall be encouraged to maintain the option and feasibility of farm use.

The parcel is also designated within the Watercourse Protection Development Permit Area (DPA). Due to a watercourse being located on the subject property, a development permit will be required prior to the subdivision of the property.

Amendments to "Regional District of Nanaimo Nanoose Bay Official Community Plan Bylaw No. 1400, 2005" are not required.

ZONING

The parcel is currently zoned Agricultural 1 (AG1), Subdivision District 'D', pursuant to "Regional District of Nanaimo Land Use and Subdivision Bylaw No. 500, 1987" (Bylaw 500) (see Attachments 4 and 5 for zoning regulations and minimum parcel size). The AG1 Zone permits farm use, residential uses, and accessory uses. The zoning allows two dwelling units on parcels greater than 2.0 hectares. The proposed subdivision will not meet the minimum parcel size of 2.0 hectares, however, the zoning bylaw permits a subdivision along a railway where the parcel does not meet the minimum parcel size, provided the requirement of the authorities having jurisdiction are met with respect to the provision of water, method of sewage disposal and access.

The applicant proposes to subdivide the property along the railway to create a 0.6 hectare remainder and a 9.7 hectare remainder, as shown on the Proposed Plan of Subdivision. Amendments to Bylaw 500 are not required, however, the application will require approval for the relaxation of the 10% road frontage requirements under the *Local Government Act*.

BOARD POLICY AND AAC PROCEDURE

RDN “Board Policy B1.8: *Review of ALR Applications*” provides an opportunity for the AAC to review and provide comments on ALR applications for exclusion, subdivision and non-farm use, on lands within the ALR. Board Policy B1.8 also includes a standing Board resolution for subdivision of lands within the ALR which reads as follows:

As outlined in the Regional Growth Strategy, the Regional District of Nanaimo fully supports the mandate of the Agricultural Land Commission (ALC) and the preservation of land within the Agricultural Land Reserve (ALR) for agricultural use. The Regional District encourages the ALC to only consider subdivision where in the opinion of the ALC the proposal will not negatively impact the agricultural use of the land or adjacent ALR lands.

In accordance with the AAC Terms of Reference, the role of the AAC members is to provide local perspective and expertise to advise the Board (and in this case comment to the ALC) on a range of agricultural issues on an ongoing and as-needed basis, as directed by the Board. In addition to members’ local knowledge and input, comment on ALR applications may be guided by Board approved policies such as the RDN AAC, the Board Strategic Plan, the RGS and the applicable OCP along with the relevant land use bylaws. Members of the AAC can also find information related to ALR land use and agriculture in BC, on the Agricultural Land Commission and Ministry of Agriculture websites. Local and contextual information can also be found on the RDN’s agricultural projects website at www.growingourfuture.ca.

Comment provided to the ALC from the AAC is consensus based, through Committee adoption of a motion. If an AAC member has comments regarding an application being submitted to the ALC, the appropriate time to provide those comments is in the Committee meeting, during discussion on the application, and prior to the Committee’s adoption of its motion. Only motions approved by the Committee will be forwarded to the ALC for its consideration. Comments from individual AAC members will not be included in the staff report that is forwarded to the ALC.

The comment provided by the AAC is not an approval or denial of the application and is only a recommendation to the ALC regarding a specific application. As per Policy B1.8 any comment from the AAC is provided in addition to the applicable standing Board resolution and Electoral Area Director’s comment. The ALC is the authority for decisions on matters related to the ALR and will consider comments in making its decision on an application.

ELECTORAL AREA DIRECTOR COMMENT

As per Board Policy B1.8, all applications under the *Agriculture Land Commission Act* for exclusion, subdivision, or non-farm use of ALR land are to be forwarded to the applicable subject property’s Electoral Area Director, for comment.

With respect to this application, Electoral Area ‘E’ Director Bob Rogers has provided the following comments:

I have reviewed both the previous and current ALC subdivision applications re 2298 Northwest Bay Road.

As RDN Director for Area E I fully support approval of this ALC application. I am confident that the separation through sub-division of this 0.57 portion of the property will not detract from the agriculture use of either the remaining portion of the parent

property or the future subdivided portion. I think the subdivision will enhance the farming potential for the smaller piece which is currently inaccessible from the parent property due to the separation caused by the Island Corridor.

I support the application because it will be beneficial to the net agricultural use/value of both resulting properties.



Stephen Boogaards
sboogaards@rdn.bc.ca
September 11, 2018

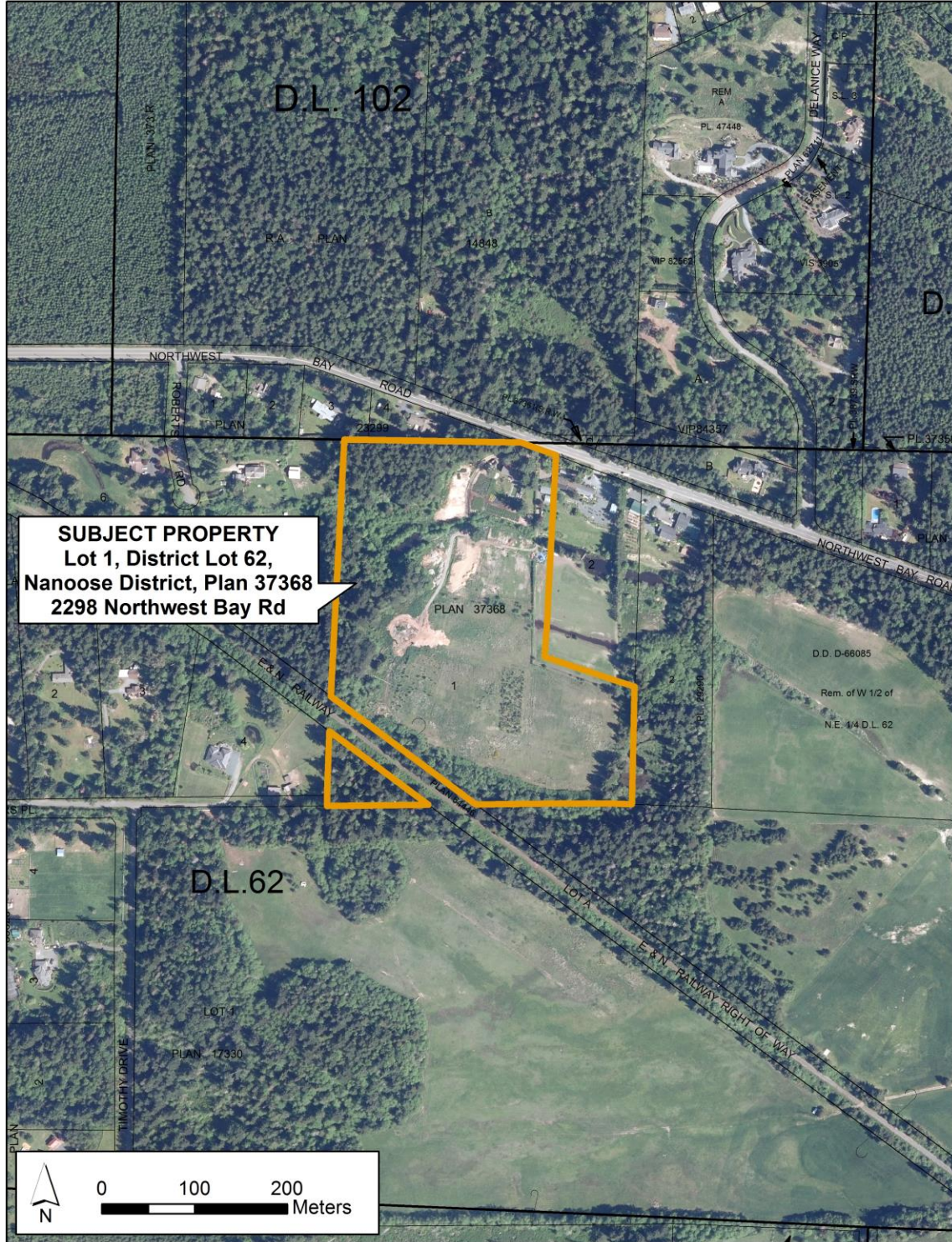
Reviewed by:

- J. Holm, Manager, Current Planning
- P. Thompson, Manager, Long Range Planning
- G. Garbutt, General Manager, Strategic & Community Development
- P. Carlyle, Chief Administrative Officer

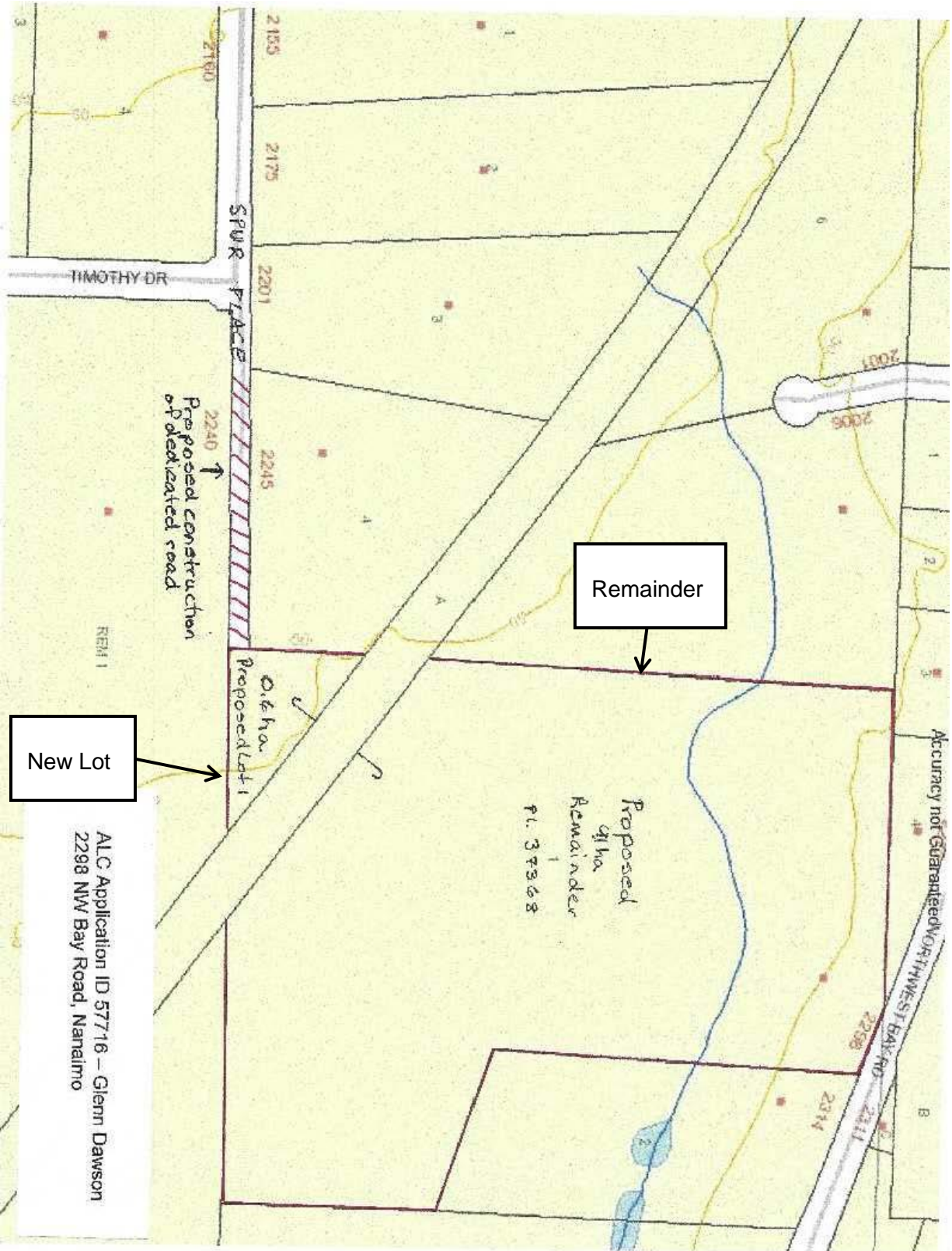
Attachments:

1. Subject Property Map
2. 2016 Aerial Photo
3. Proposed Site Plan
4. Existing Zoning
5. Bylaw 500, Schedule '4B' Subdivision Districts – Minimum Parcel Size
6. Official Community Plan Land Use Designation
7. Regional Growth Strategy - Land Use Designation
8. Regional Growth Strategy - Goal 7 - Enhance Economic Resiliency – Agriculture
9. Regional Growth Strategy - Goal 8 – Food Security
10. Applicant's Submission

Attachment 2
2016 Aerial Photo



**Attachment 3
Proposed Site Plan**



**Attachment 4
Existing Zoning
(Page 1 of 3)**

Section 3.4.1

AGRICULTURE 1

AG1³⁴³⁵

3.4.1.1 Permitted Uses and Minimum Site Area

Permitted Principal Uses

- a) Farm Use – on lands located in the Agricultural Land Reserve
- b) Agriculture – on lands not located in the Agricultural Land Reserve
- c) Residential Use

Permitted Accessory Residential Uses

- a) Home Based Business
- b) Secondary Suite

Permitted Accessory Farm Uses

- a) Temporary Sawmill
- b) Agricultural Education and Research
- c) Agri-tourism Accommodation
- d) Production of Biological Integrated Pest Management Products

3.4.1.2 Maximum Number and Size of Buildings and Structures

- 1) Accessory residential buildings combined floor area of 400 m²
- 2) Dwelling units/parcel
 - a) on a parcel having an area of 2.0 ha or less 1
 - For Electoral Areas 'A', 'C', 'E', and 'H'**
 - b) on a parcel having an area greater than 2.0 ha 2
 - For Electoral Area 'G'**
 - c) on a parcel having an area equal to or greater than twice the minimum parcel size as established by Schedule '4B Subdivision District – Minimum Parcel Sizes' 2
 - d) Notwithstanding subsection (c), on a parcel located in this zone and created prior to February 22, 2011 and having an area greater than 2.0 ha. 2
- 3) Height (non-farm and accessory farm buildings and structures) 9.0 m

³⁴ Bylaw No.500.383, Adopted June 25, 2013

³⁵ Bylaw No. 500.402, adopted June 28, 2016

Attachment 4
Existing Zoning
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AGRICULTURE 1 continued

- 4) Parcel coverage
- | | |
|---|-----|
| a) Non-farm buildings and structures | 10% |
| b) Farm or agriculture buildings and structures | 25% |
| c) Greenhouses | 75% |
- d) In no case shall the combined parcel coverage exceed 75%.
- e) Notwithstanding a), b), c) and d) above or any other regulation in this Bylaw, the following agricultural structures shall be exempt from maximum parcel coverage:
- i) Permeable detention ponds
 - ii) Support structures used for shading, frost and wind protection, netting, or trellising.
-

3.4.1.3 Minimum Setback Requirements

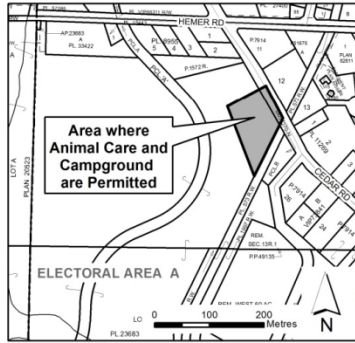
- 1) All non-farm buildings and structures – All lot lines 8.0 m
except where:
- a) the parcel is less than 4000 m² in area then the setback from lot lines may be reduced to 2.0 m from an interior side lot line and to 5.0 m from other lot lines, excluding the front lot line;
 - b) any part of a parcel is adjacent to or contains a watercourse or the sea then the regulations in Sections 3.3.8 and 3.3.9 shall apply.
- 2) All agriculture or farm buildings, structures and uses – in accordance with Section 3.3.10.
-

3.4.1.4 Other Regulations

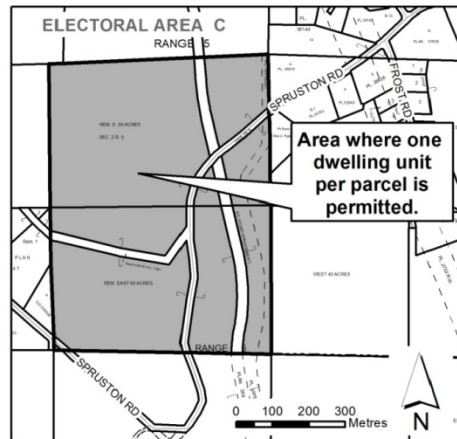
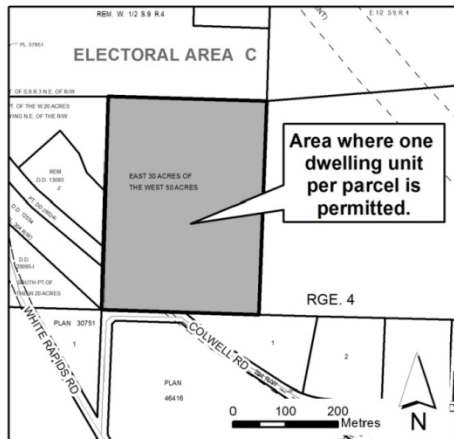
- 1) For any part of a parcel in the Agricultural Land Reserve, 'Farm Use' shall be a permitted principal use and for any part of a parcel not located in the Agricultural Land Reserve, 'Agriculture' shall be a permitted principal use.
- 2) Accessory Farm uses are only permitted on that part of a parcel that is within the Agricultural Land Reserve.
- 3) Specific 'Farm' and 'Permitted' uses as defined in the *Agricultural Land Reserve Use, Subdivision, and Procedure Regulation* shall be developed in accordance with Section 3.3.15 and 3.3.16 of this Bylaw.
- 4) Despite any regulation in this Bylaw, land established as "Agricultural Land Reserve" pursuant to the *Agricultural Land Commission Act* is subject to the *Agricultural Land Commission Act* and *Regulations*, and applicable orders of the Land Reserve Commission.

Attachment 4
Existing Zoning
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- 5) Animal Care and Campground shall be permitted in the shaded area outlined in bold in the map below.



- 6) Notwithstanding Section 3.4.1.2 Dwelling units/parcel the maximum number of dwelling units permitted in the shaded areas outlined in bold in the maps below shall be limited to one dwelling unit per parcel.



Attachment 5
Bylaw 500, Schedule '4B' Subdivision Districts – Minimum Parcel Size

Part 4 – Subdivision Regulations '4B' – Subdivision Districts

REGIONAL DISTRICT OF NANAIMO

BYLAW NO. 500

SCHEDULE '4B' SUBDIVISION DISTRICTS - MINIMUM PARCEL SIZES

- 1) The minimum size of any lot created by subdivision shall be determined by the standard of services provided and shall meet the applicable minimal parcel size set out below: ¹

Minimum Parcel Sizes				
Subdivision District	Community Water & Sewer System	Community Water System - No Community Sewer	Community Sewer System - No Community Water	All Other Subdivisions
A	20.0 ha	20.0 ha	20.0 ha	20.0 ha
B	8.0 ha	8.0 ha	8.0 ha	8.0 ha
C	5.0 ha	5.0 ha	5.0 ha	5.0 ha
CC ²	4.0 ha	4.0 ha	4.0 ha	4.0 ha
D	2.0 ha	2.0 ha	2.0 ha	2.0 ha
E	1.6 ha	1.6 ha	1.6 ha	1.6 ha
F	1.0 ha	1.0 ha	1.0 ha	1.0 ha
G	8000 m ²	1.0 ha	1.0 ha	1.0 ha
H	5000 m ²	1.0 ha	1.0 ha	1.0 ha
J ³	4000 m ²	6000 m ²	1.0 ha	1.0 ha
K	4000 m ²	4000 m ²	4000 m ²	4000 m ²
L	2000 m ²	2000 m ²	4000 m ²	4000 m ²
M	2000 m ²	2000 m ²	1.0 ha	1.0 ha
N ^{4,5}	1600 m ²	1600 m ²	1.0 ha	1.0 ha
P	1000 m ²	1600 m ²	1.0 ha	1.0 ha
Q (EA G only)	700 m ²	⁶ 1.0 ha	1.0 ha	1.0 ha
Q (other EAs)	700 m ²	2000 m ²	1.0 ha	1.0 ha
R	500 m ²	⁷ 1.0 ha	1.0 ha	1.0 ha
S ⁸	400 m ²	2000 m ²	1.0 ha	1.0 ha
T ⁹	600 m ²	No further subdivision		
V ¹⁰	50.0 ha	50.0 ha	50.0 ha	50.0 ha
Z	No further subdivision			
CD9 ¹¹	400 lots with approved pump and haul service connection			

¹ Bylaw No. 500.238, adopted February 10, 1998
² Bylaw No. 500.347, adopted September 22, 2009
³ Bylaw No. 500.27, adopted August 9, 1988
⁴ Bylaw No. 500.66, adopted December 12, 1989
⁵ Bylaw No. 500.324, adopted February 28, 2006
⁶ Bylaw No. 500.264, adopted October 10, 2000
⁷ Bylaw No. 500.264, adopted October 10, 2000
⁸ Bylaw No. 500.27, adopted August 9, 1988
⁹ Bylaw No. 500.394, adopted August 25, 2015
¹⁰ Bylaw No. 500.253, adopted January 11, 2000
¹¹ Bylaw No. 500.275, adopted October 9, 2001

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receiving waters, including channel stability and flow maintenance.

3.4 RESOURCE LANDS

The Resource Lands designation applies to lands that are valued for their agricultural use, forestry use, natural resource extraction capability, yet also valued for their environmental attributes, as these lands provide habitat for indigenous species on Vancouver Island.

This land use designation includes all those lands within the Agricultural Land Reserve (ALR) and lands that were in the former provincially designated Forest Land Reserve (FLR). It also includes lands with known and active resource uses that may or may not be in the ALR or FLR, and other large holdings including large recreational holdings and those used for federal or provincial purposes.

Agriculture is a permitted use in a large proportion of the Nanoose Bay Plan Area. It represents a primary and secondary source of income for some Nanoose Bay residents. Land management practices, which preserve agricultural land and the sustainable production of food, are supported and encouraged in this OCP.

Forestry is a dominant component of the Nanoose Bay economy. In addition to its economic value, residents appreciate the recreational opportunities, ecological and wildlife values afforded by the forested landscape.

In recognition of their value to the community, residents have expressed a desire to protect forestry lands and related activities. Also supported are sustainable and environmentally sound harvesting and logging practices and the restriction of intensive processing activities in proximity to established or future residential development.

Forest lands are predominantly managed through private forestry interests or through the Crown Provincial Forest.

Lands within this designation are part of the Nanaimo coal bearing formations while other areas, particularly south of the Island Highway, have very good potential for aggregates such as sand and gravel. Management of mineral resources falls principally within the jurisdiction of the province. Where stated, policies relate to matters beyond the jurisdiction of the Regional District, they are intended to serve only as broad objectives to help guide senior governments in their decision-making process.

Objectives:

1. *Support* and maintain the long-term viability of the natural resource land base and protect it from activities and land uses that may diminish its resource value or potential.
2. *Protect* the agricultural land resources for present and future food production.
3. *Recognize* and *protect* agricultural operations on ALR lands.
4. *Encourage* sustainable and environmentally sound farming practices, which protect surface water, groundwater and soil quality.
5. *Recognize* and *protect* the groundwater needs of agriculture.
6. *Support* silviculture activities on productive forestry land.
7. *Protect* the forest land resources for harvesting and reproduction.
8. *Recognize* and *protect* the needs and activities of forestry operations when considering non-forestry operations on adjacent land.

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9. *Support* the public's use of forest lands for recreational enjoyment and education.
 10. *Protect* lands with aggregate or mineral resources from development that would render the resource unviable or inaccessible.
 11. *Seek* methods of minimizing conflicts between extraction activities and adjacent land uses.
 12. *Minimize* the impact of extraction activities on the natural environment.
 13. *Support* provincial requirements for site rehabilitation and reclamation of mined landscapes for future productive use and for environmental and aesthetic considerations.
 14. *Minimize* the impact of resource operations and activities on the natural environment and on neighbouring land uses and development.
 15. *Protect* sensitive ecosystems and features on Resource Lands.
- Policies:**
1. Resource Lands are designated on Map No. 2.
 2. Lands designated Resource Lands that are forest and/or crown lands or large recreational holdings shall have a minimum parcel size of 50.0 hectares. All other Resource Lands shall have a minimum parcel size of 8.0 hectares. However, this is not intended to prevent parcel averaging as set out in the applicable zoning bylaw.
 3. Notwithstanding Policy No. 2 (above), lands designated as Resource Lands and entirely within the provincial Agricultural Land Reserve shall have a minimum parcel size of 8.0 hectares. The provision of community water and sewer services to lands within this designation is not supported by this OCP.
 4. Permitted uses on Resource Lands shall be compatible with existing agricultural and resource uses.
 5. It is acknowledged that the Department of National Defence operates facilities within this designation that are provided with community water and sewer services.
 6. The Agricultural Land Commission's (ALC) mandate of preserving and encouraging agricultural production shall be supported.
 7. The retention of large land holdings within the ALR shall be encouraged to maintain the option and feasibility of farm use.
 8. The locations and construction of new roads, utility or communication rights-of-way shall be sited to avoid the ALR wherever possible. Where agricultural land is required, these rights-of-way should be sited in a manner that will cause minimal impact on agricultural operations. Alignments should be established in consultation with affected local landowners.
 9. In order to reduce conflicts between agricultural uses and non-agricultural uses a Farm Land Protection Development Permit Area has been established on lands adjacent to lands within the Agricultural Land Reserve.
 10. Measures which buffer new development adjacent to land within the ALR shall be encouraged to reduce the potential for land use conflicts. These measures may include restrictive covenants to protect naturally established buffers, dedication of park land where in compliance with the parks policy strategy of the Plan, or the use of landscaping and/or fencing in

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accordance with the ALC's "Landscape Buffer Specifications" along property lines.

11. The regulation of intensive agricultural operations on non-ALR land within the Plan Area shall be supported in order to recognize the potential that these operations have to generate significant impacts on the natural environment and surrounding lands and development.
12. Where land is within the ALR and is proposed for subdivision or non-farm use, including the placement of a second dwelling, approval must first be obtained from the Agricultural Land Commission, except where additional dwellings are necessary for farm purposes subject to the *Agricultural Land Commission Act*. All subdivision and non-farm uses within the ALR shall comply with the agricultural objectives and policies within this section of the Plan.
13. Where land is removed from the ALR, the Resource Lands within the ALR designation shall remain.
14. The issuance of temporary use permits for the manufacture of asphalt products and/or gravel extraction on parcels may be considered provided that:
 - a) the asphalt is produced in a portable asphalt batch plant;
 - b) parcels are in excess of 8.0 hectares in area;
 - c) any watercourses are protected from the manufacturing or gravel extraction activity;
 - d) approval is obtained from the province for an industrial access permit and a Waste Management approval pursuant to the *Waste Management Act*;
 - e) a separation distance created by a natural vegetative buffer or berm of 100 metres in width is maintained between the asphalt batch plant operation and any dwelling unit not located on the subject property;
- f) where gravel removal and processing are required in conjunction with the manufacture of asphalt products, all requirements for the Approval of Work System and Reclamation Permit under the *Mines Act* including provisions for rehabilitation of the site after completion, are satisfied;
- g) primary processing is a permitted use on the parcel; and
- h) where land is within the Agricultural Land Reserve, notice has been given to the ALC of the intent to remove gravel or process soil in accordance with the *Agricultural Land Commission Act* and the ALC has granted approval.
15. For Resource Lands not within the ALR, the issuance of temporary use permits for soil composting operations on parcels may be considered provided that:
 - a) parcels are in excess of 8.0 hectares in area;
 - b) surface water is protected from all composting activities;
 - c) ground-water will not be negatively impacted by all composting activities;
 - d) approval is obtained from the ALC where required;
 - e) approval is obtained from the province for an industrial access permit and a Waste Management approval pursuant to the *Waste Management Act*;
 - f) a separation distance created by a natural vegetative buffer or berm of 100 metres in width is maintained between the composting operation

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- g) and any dwelling not located on the subject parcel;
 - h) the daily period of composting activities is limited to normal daylight hours to minimize noise impacts, including heavy truck traffic, on surrounding lands;
 - i) all aspects of the composting operation must be completed in its entirety within two calendar years of the date of issuance of a temporary use permit;
 - j) primary processing is a permitted use on the parcel;
 - k) the use does not produce odours detectable from adjacent parcels;
 - l) the uses comply with the provincial *Organic Matter Recycling Regulations* and any RDN Waste Stream Licensing Bylaw.
16. The processing of aggregate resources shall generally be limited to areas where such operations would have a limited impact on residential development, other land uses and the natural environment, and where permitted by the Land Use and Subdivision Bylaw.
17. The province shall be encouraged to provide due consideration to the RDN's response to referrals on potential mining operations, and to possible impacts on neighbouring land and the natural environment prior to approving new mining operations or re-establishing a derelict pit. Particular attention should be focused on assessing the potential impacts of resource removal on the quantity or quality of surface and groundwater, residential development and other land uses, traffic volumes and traffic dynamics. The province is encouraged to make this information available to the Regional District and surrounding landowners for comment prior to a decision.

3.5 TOURIST COMMERCIAL LANDS

Land within the Tourist Commercial Lands designation is currently used for a variety of resort, condominium, commercial and industrial uses. Coastal uses are oriented toward ocean and marine related tourist activities. The inland commercial uses have historically been oriented toward the highway as opposed to the current strategy to locate commercial uses within Village and Neighbourhood Centres.

In most cases, the Tourist Commercial Lands have more intensive land uses than found on surrounding lands and therefore present the possibility of creating land use conflicts.

The Nanose Bay Official Community Plan recognizes the importance of commercial and industrial uses and tourism to the economy consistent with the Regional Growth Strategy. Existing resort condominium developments are recognized as an important part of Nanose Bay's economy. It is also recognized that these developments must be compatible in character with surrounding residential areas. Over the long term, it is anticipated that these resort condominium developments may be developed to the extent permitted by their current zoning and the existing level of services. The provision of an increased level of community water and sewer servicing to facilitate increased development potential for lands currently zoned for resort condominium development is not supported in this OCP.

Existing inland commercial activities away from the coast or outside the centres are intended to evolve into less intensive tourist commercial uses primarily serving the tourism market or travelling public rather than providing local convenience services. It is anticipated that, over time, these inland commercial and industrial uses will become

Attachment 7 Regional Growth Strategy Land Use Designation

Resource Lands and Open Space

The Resource Lands and Open Space land use designation includes:

- Land that is primarily intended for resource uses such as agriculture, forestry, aggregate and other resource development; and
- Land that has been designated for long-term open space uses.

This designation includes:

- Land in the Agriculture Land Reserve;
- Crown land;
- Land designated for resource management or resource use purposes, including forestry, in official community plans;
- Recognized ecologically sensitive conservation areas;
- Provincial parks;
- Regional parks;
- Large community parks;
- Cemeteries;
- Existing public facilities outside of areas planned for mixed-use centre development;
- Destination Resorts; and
- Golf courses.

Resource activities on land in this designation should be encouraged to operate in ways that do not harm the functioning of natural ecosystems. Land use control, and resource management of lands in this designation is shared between landowners, local, provincial and sometimes federal government. Much of the forest land is privately owned. Forest companies, farmers, shellfish aquaculture (and associated research facilities) and aggregate resource development companies are recognized to have the right to operate on land within this designation in compliance with local, provincial and federal government regulations.

No new parcels that are smaller than the size supported by the official community plan in effect at the date of the adoption of this *Regional Growth Strategy* may be created on land in this designation.

Attachment 8

Regional Growth Strategy Goal 7 – Enhance Economic Resiliency - Agriculture

Agriculture

- 7.14 Recognize the importance of agriculture to the region's economy. To this end, the RDN and member municipalities agree to:
- Support the management of the Agriculture Land Reserve (ALR) by the provincial government;
 - Encourage the provincial government to protect the agricultural land base through the ALR;
 - Support the agricultural use of ALR lands within designated Urban Areas or Rural Village Areas except in instances where urban land uses have already been established at the time of the adoption of this RGS;
 - Recognize that all ALR lands will be subject to the regulations of the Agricultural Land Commission;
 - Support the preparation of a study of agriculture in the region for the purpose of identifying the issues and needs (both immediate and future) of the agricultural sector;
 - Encourage and support value-added agricultural industries; and
 - Enhance opportunities for agricultural activity on lands not in the ALR.

Attachment 9
Regional Growth Strategy Goal 8 – Food Security
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Goal 8 - Food Security - Protect and enhance the capacity of the region to produce and process food.

Most of the food we eat comes from other parts of the world. A study conducted by the Region of Waterloo Public Health in Ontario (M. Xuereb, 2005) found that *'Imports of 58 commonly eaten foods travel an average of 4,497 km to Waterloo Region'*. Although there are currently no regionally specific studies estimating the distance food travels to reach our plates, it is safe to estimate that many of the foods we regularly consume travel on average at least 2,400 km to reach us (a widely quoted figure for North America, based on research conducted in Iowa by R. Pirog, et al 2001).

Despite ongoing debate about the environmental benefits of 'buying local' food versus making dietary changes (C. Weber and H. Scott Matthews, 2008), it is clear that our dependence on imported foods means that our access to food is vulnerable to the effects of weather and political events that may occur thousands of kilometers away. As well, world energy prices play a large role in the cost of food production and distribution. Greater food security means that more food is grown locally and therefore is not as susceptible to events occurring outside the region.

Local food production generates numerous economic, environmental and social benefits. Agriculture employs almost 3,000 people and generates a flow of income into the region. Local sources of food help reduce the region's carbon footprint by reducing transportation-related GHG emissions. In addition, the nutritional content of locally produced food is often greater than imported food – providing a healthier choice of food for residents.

Ensuring the long-term viability of farming and agricultural activity in the region requires a coordinated effort on the part of local, provincial and federal authorities. In addition to the provisions of Policy 5.4, the RDN and member municipalities can undertake a number of actions to support and enhance the viability of food production in the region as set out in the following policies (See Map 5 – Agricultural Lands).

The '5 A's' of food security:

- *Available – sufficient supply*
- *Accessible – efficient distribution*
- *Adequate – nutritionally adequate and safe*
- *Acceptable – produced under acceptable conditions (e.g. culturally and ecologically sustainable)*
- *Agency – tools are in place to improve food security*

Attachment 9
Regional Growth Strategy Goal 8 – Food Security
(Page 2 of 3)

Protecting the agricultural land base is a key requirement for enhancing food security. The Agricultural Land Reserve (ALR) established by the Province in 1973 has largely been effective in reducing the loss of agricultural lands. Since 1974 the percentage of land protected under the ALR in the RDN has decreased approximately 12%, from 10.10% of the total land base to approximately 8.85% (www.alc.gov.bc.ca/alr/stats).

The majority of ALR lands in the RDN are located in rural Electoral Areas, with smaller portions located within the boundaries of municipalities. This RGS recognizes and supports the jurisdiction of the ALC over all ALR lands and strongly supports the retention and use of all ALR lands for agriculture. The RDN will continue to endorse the Agricultural Land Commission's efforts in preserving agricultural lands. Other actions that would enhance food security in the region include:

- Supporting improved access to sustainable water supplies for irrigation;
- Encouraging best water management practices in agriculture;
- Providing drainage infrastructure for flood-prone lands that do not include environmentally sensitive areas;
- Improving infrastructure to provide agricultural services and processing; and improving access to markets.

Policies

The RDN and member municipalities agree to:

- 8.1 Encourage and support the Agricultural Land Commission in retaining lands within the ALR for agricultural purposes.
- 8.2 Discourage the subdivision of agricultural lands.
- 8.3 Include provisions in their official community plans and zoning bylaws to allow for complementary land uses and activities that support the on-going viability of farming operations.
- 8.4 Establish agriculture as the priority use on land in the ALR.
- 8.5 Minimize the potential impact non-farm land uses may have on farming operations and include policies in their official community plans and zoning bylaws that reduce the opportunity for land use conflicts to occur.
- 8.6 Encourage and support agricultural activity on lands that are not within the ALR. This may include small-scale home-based agricultural businesses.

Attachment 9
Regional Growth Strategy Goal 8 – Food Security
(Page 3 of 3)

- 8.7 Recognize the importance of value-added agricultural uses and complementary land use activities for the economic viability of farms. To support complementary farm uses, official community plans should consider:
- The provision of appropriately located agricultural support services and infrastructure;
 - Reducing impediments to agricultural processing and related land uses;
 - Allowing compatible complementary land use activities (e.g., agri-tourism);
 - Allowing farmers' markets and other outlets that sell local produce to locate in all parts of the community.
- 8.8 Encourage urban agriculture initiatives and support activities and programs that increase awareness of local food production within the region.
- 8.9 Support the appropriate use of water resources for irrigation of agricultural lands.
- 8.10 Support the provision of drainage infrastructure to flood-prone lands that do not lie within environmentally sensitive areas.
- 8.11 Work in collaboration with federal and provincial agencies, adjacent regional districts, and agricultural organizations to improve access to markets for agricultural products.
- 8.12 Support partnerships and collaborate with non-profit groups to enhance the economic viability of farms.
- 8.13 Support farms that produce organic agricultural products and use sustainable farming practices.
- 8.14 Support the production, processing, distribution and sale of locally grown produce (including shellfish).

Attachment 10
Applicant's Submission

Provincial Agricultural Land Commission - Applicant Submission

Application ID: 57716

Application Status: Under LG Review

Applicant: Glenn Dawson

Agent: YourLand Development & Research Solutions

Local Government: Nanaimo Regional District

Local Government Date of Receipt: 07/11/2018

ALC Date of Receipt: This application has not been submitted to ALC yet.

Proposal Type: Subdivision

Proposal: To:

- 1) Subdivide the 9.7 ha property along the railway line into one lot of 0.6 ha and a 9.1 ha remainder, AND,
- 2) construct the currently dedicated but unconstructed portion of Spurs Place along the southern boundary of Lot 4, Plan 36082, located adjacent to the proposed 0.6 ha lot. This will provide access to the 0.6 ha lot.

The 0.6 ha lot currently does not have access to the parent parcel across the railway and discussions with Graham Bruce, CEO of the Island Corridor Foundation (ICF), have not been supportive of an application for access. In the letter from Mr. Bruce dated Feb. 14, 2018 he states that without extensive background data clearly demonstrating there is no alternate route that does not involve crossing the railroad the ICF is not granting additional level crossings. Application for permission to cross the railway is an expensive and time-consuming endeavor with little chance of success when there is an alternate access available.

Please see Report dated July 6, 2018 for additional information.

Agent Information

Agent: YourLand Development & Research Solutions

Mailing Address:

PO Box 45124 Ocean Park

Surrey, BC

V4A 9L1

Canada

Primary Phone: (604) 417-4562

Email: YourLand@telus.net

Parcel Information

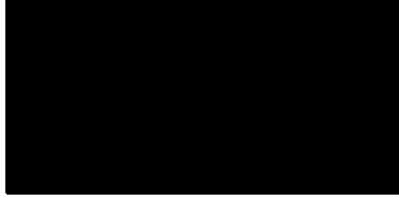
Parcel(s) Under Application

1. **Ownership Type:** Fee Simple
Parcel Identifier: 001-047-981
Legal Description: L 1 DL 62 NANOOSE DISTRICT PL 37368
Parcel Area: 9.7 ha
Civic Address: 2298 Northwest Bay Road, Nanoose Bay, BC V9P 9B3
Date of Purchase: 07/20/2005

Applicant: Glenn Dawson

Farm Classification: No
Owners

1. **Name:** Glenn Dawson



Current Use of Parcels Under Application

1. Quantify and describe in detail all agriculture that currently takes place on the parcel(s).

There is some storage of trees for the nursery located directly west of the property.

2. Quantify and describe in detail all agricultural improvements made to the parcel(s).

A well and a partial irrigation system were added to support the agricultural business that was started by the owner's son. The main property is fenced while the 0.6 ha parcel separated by the railway is not fenced and has no agricultural improvements.

3. Quantify and describe all non-agricultural uses that currently take place on the parcel(s).

There is a single family home on the property.

Adjacent Land Uses

North

Land Use Type: Agricultural/Farm

Specify Activity: Small residential lots and NW Bay Road

East

Land Use Type: Agricultural/Farm

Specify Activity: Nursery owned by Mr. Dawson's sister and family and a residential, treed property.

South

Land Use Type: Agricultural/Farm

Specify Activity: Railway and Spur Place then agricultural lot.

West

Land Use Type: Agricultural/Farm

Specify Activity: Residential lots.

Proposal

1. Enter the total number of lots proposed for your property.

0.6 ha

9.1 ha

Applicant: Glenn Dawson

2. What is the purpose of the proposal?

To:

- 1) Subdivide the 9.7 ha property along the railway line into one lot of 0.6 ha and a 9.1 ha remainder,
- AND,
- 2) construct the currently dedicated but unconstructed portion of Spurs Place along the southern boundary of Lot 4, Plan 36082, located adjacent to the proposed 0.6 ha lot. This will provide access to the 0.6 ha lot.

The 0.6 ha lot currently does not have access to the parent parcel across the railway and discussions with Graham Bruce, CEO of the Island Corridor Foundation (ICF), have not been supportive of an application for access. In the letter from Mr. Bruce dated Feb. 14, 2018 he states that without extensive background data clearly demonstrating there is no alternate route that does not involve crossing the railroad the ICF is not granting additional level crossings. Application for permission to cross the railway is an expensive and time-consuming endeavor with little chance of success when there is an alternate access available.

Please see Report dated July 6, 2018 for additional information.

3. Why do you believe this parcel is suitable for subdivision?

The 0.6 ha parcel is directly adjacent to residential lots which were permitted by ALC decisions. The creation of the proposed lot, which is not and has never been accessible to the parent parcel, will have no impact on the future use of the remainder of the property for agricultural development.

4. Does the proposal support agriculture in the short or long term? Please explain.

The proposal will have no impact on the agricultural use of the parent parcel or any of the surrounding agricultural properties. The proposed 0.6 ha lot is at the end of Spurs Place. The access beyond 2245 Spurs Place is currently dedicated but unconstructed. The 0.6 ha lot is physically separated by the railway and not accessible from the parent parcel so it will not raise expectations for further subdivision of agricultural lands in the area.

5. Are you applying for subdivision pursuant to the ALC Homesite Severance Policy? If yes, please submit proof of property ownership prior to December 21, 1972 and proof of continued occupancy in the "Upload Attachments" section.

No

Applicant Attachments

- Agent Agreement - YourLand Development & Research Solutions
- Site Photo - Photographs of property and area
- Other correspondence or file information - Survey Plan
- Other correspondence or file information - Subject Property
- Site Photo - Air Photo
- Other correspondence or file information - Report
- Proposal Sketch - 57716
- Other correspondence or file information - Area Map
- Other correspondence or file information - Letter from CEO Island Corridor Foundation
- Certificate of Title - 001-047-981

ALC Attachments

None.

Applicant: Glenn Dawson

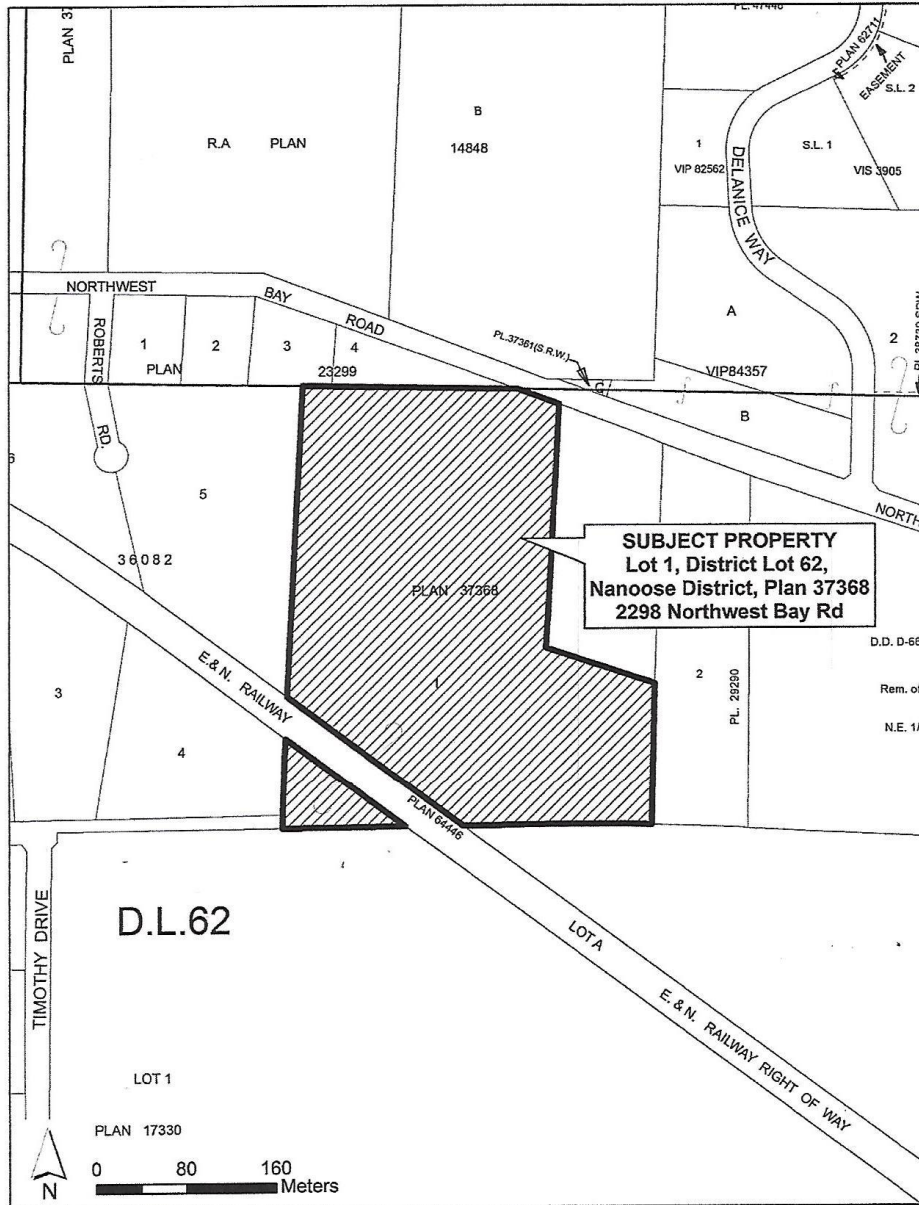
Decisions

None.



ALC Application ID 57716 – Glenn Dawson
2298 NW Bay Road, Nanaimo





TITLE SEARCH PRINT

File Reference: Dawson C of T
Declared Value \$ [REDACTED]

2018-05-24, 11:24:23
Requestor: Sherry Gordon

****CURRENT INFORMATION ONLY - NO CANCELLED INFORMATION SHOWN****

Land Title District VICTORIA
Land Title Office VICTORIA

Title Number EX84437
From Title Number ET100091

Application Received 2005-07-11

Application Entered 2005-07-20

Registered Owner in Fee Simple
Registered Owner/Mailing Address: GLENN DAWSON, LAWYER
[REDACTED]

Taxation Authority Nanaimo/Cowichan Assessment Area

Description of Land
Parcel Identifier: 001-047-981
Legal Description:
LOT 1, DISTRICT LOT 62, NANOOSE DISTRICT, PLAN 37368

Legal Notations

THIS CERTIFICATE OF TITLE MAY BE AFFECTED BY THE AGRICULTURAL LAND COMMISSION ACT; SEE AGRICULTURAL LAND RESERVE PLAN NO. 5, DEPOSITED 26.07.1974, R.E.HOOPER, REGISTRAR, PER: ALW

Charges, Liens and Interests

Nature: EXCEPTIONS AND RESERVATIONS
Registration Number: M76300
Registered Owner: ESQUIMALT AND NANAIMO RAILWAY COMPANY
Remarks: INTER ALIA
A.F.B. 9.693.7434A
SECTION 172(3)
DD 12373
FOR ACTUAL DATE AND TIME OF REGISTRATION SEE ORIGINAL GRANT FROM E & N RAILWAY COMPANY

TITLE SEARCH PRINT

File Reference: Dawson C of T
Declared Value \$208428

2018-05-24, 11:24:23
Requestor: Sherry Gordon

Nature: MORTGAGE
Registration Number: FB53287
Registration Date and Time: 2007-05-29 10:00
Registered Owner: SCOTIA MORTGAGE CORPORATION

Nature: MORTGAGE
Registration Number: CA1294407
Registration Date and Time: 2009-10-01 09:46
Registered Owner: COMMUNITY FUTURES DEVELOPMENT CORPORATION OF CENTRAL ISLAND
INCORPORATION NO. XS-41012

Nature: JUDGMENT
Registration Number: FB477301
Registration Date and Time: 2014-02-13 13:44
Registered Owner: THE CROWN IN RIGHT OF CANADA

Duplicate Indefeasible Title NONE OUTSTANDING

Transfers NONE

Pending Applications NONE

**Review of Agricultural Land Commission
Application Number 56569**

**for Property located at
2298 Northwest Bay Road, Nanoose, BC**

Prepared by

Sherry Gordon, BA
YourLand Development & Research Solutions

February 24, 2018

The intent of this project was to review the application for subdivision of the subject property, refused by the Agricultural Land Commission (ALC) on October 16, 2017 and determine if grounds exist to warrant a review of the application and/or the process by which this proposal could be brought back to the Commission.

The original application proposed to subdivide a 2.38 ha (5.87 ac) lot, containing the existing house located on North Bay Road and leave a 7.35 ha (18.2 ac) remainder. The application was amended by submission to the ALC on September 13, 2017 with an alternative subdivision along the railway proposed, resulting in the creation of a 0.57 ha (1.41 ac) parcel and 9.16 ha (22.63 ac) remainder.

Review of the application included:

- Examination of all of the documents which made up the original application, as well as those documents prepared by the Local Government and the ALC Staff. This was the information considered by the Commission during its review of the proposal.
- Accessing the historical files that made up part of the application material presented to the Commission, considered by the ALC Staff to be relevant to the application.
- Determining if there were historical applications which created the subdivisions on the side of the tracks where the new 0.57 ha lot was proposed. Identifying them and requesting they be brought back from off-site storage for review.
- Researching the historical applications which created the 5 acre (2.0 ha) properties on the same side of the railway as the 0.57 ha lot.
- Identifying the owners of the rail line which bisects the subject property and attempting to obtain further information on the railway as it affects this property and the proposed subdivision.
- Discussion with the ALC Planners Gordon Bednard and Caitlin Dorward.
- Discussion with Stephen Boogards, Planner for the RDN.

Background Information

The Application material which was attached to the October 16, 2017 decision letter does not address the submission of the amended proposal in the "Application" section. The only place the amendment is referred to is in the "Background" section, which notes that "...a submission was made which identified alternative subdivision alignments that the Applicant would like the Panel to consider, in case they are not supportive of the Proposal." It does not mention that the amended proposal was to subdivide along the railway, nor is there any accompanying plan showing the proposed subdivision.

The historical applications which were reviewed by the ALC staff were those which had resulted in the creation of the 9.73 ha subject property. These files did not provide anything significant to our understanding of the situation other than that the ALC has long considered this to be a valuable, high capability, agricultural area and has attempted to minimize reduction of parcel sizes to preserve the areas' agricultural integrity.

What was notable was the lack of information regarding the application history on the other side of the tracks, where the 0.57 ha lot was proposed. When those files were identified and obtained for viewing it became apparent that the 5 acre (2.0 ha) lots which exist in the vicinity of the 0.57 ha proposed lot were permitted by the Commission in the early 1980's. The area of the subdivisions was considered to be of lower agricultural capability by the various Agrologists and individuals who provided comments to the Commission at the time.

The 5 acre parcel size was determined by the minimum lot size of the zoning in place at that time, although comments were also made that smaller lots would have a more significant impact on those higher capability lands being retained for agriculture and should not be permitted.

Based on this information it is surprising that Commission Staff did not specifically address these applications. While it is important to note that the ALC's decisions are not bound by precedent, this was a significant oversight in the material being considered by the Commission and did not provide a comprehensive understanding of the history of the area.

Even the ALC's final decision which states that "The Panel does not support subdivision of the Property in any of the proposed alignments, as subdivision may limit the range of agricultural options available and the Panel finds that

the property has greater agricultural potential as a large cohesive farm parcel.”, leads one to conclude that the Panel did not remember the specifics of the amended proposal, the size of the proposed lot or its location on the other side of the tracks, as permitting the creation of the 0.57 ha lot on the other side of the railway would not have affected the existing farm property accessed from North Bay Road.

On the assumption that the Panel might have assumed that the 0.57 ha proposed lot could be worked as part of the larger farm unit I contacted the Island Corridor Foundation to find out if a legal crossing could be built over the tracks to access the property on the other side.

In response to my request for information the Island Corridor Foundation replied that it is not granting additional level road crossings without the applicant supplying extensive background data that clearly demonstrates there is no alternate route that does not involve crossing the railroad and that the Victoria Subdivision has one of the highest crossing counts per mile in the country. If the ICF Board approved the application it would be conditional on technical and engineering approval by their rail operator Southern Rail Vancouver Island (SVI) to ensure that there would be no negative impact on the safety of rail operation. All costs of the review and approval process from either ICF or SVI would be the responsibility of the applicant. Costs could include a one-time fee, annual crossing fees as well as any legal and site visit expenses.

Without confirmation (which has been requested) from ICF I can only assume that this is a very costly process with little chance of success. If the 0.57 ha parcel cannot be accessed across the tracks legally, this would be the strongest case for reconsideration of the application which could be made. Making a case for reconsideration based solely on the perceived lack of potential for a crossing is not as strong a position but can be strengthened by adding additional concessions to the submission.

Options

- 1) Request reconsideration of the original submission, specifically addressing the amended proposal, based on the submission of new information relating to the unlikely success of an application to gain legal access to the 0.57 ha property on the other side of the rail line.

Additional information in support of the Reconsideration would be:

- i) the perceived lack of Commission review of the amended proposal based on there being no information contained in the Staff Report of the details of the amended proposal,
- ii) no comment about the existing subdivisions directly adjacent to the 0.57 ha lot proposed in the amendment which had been allowed by the Commission, which was based on multiple Agricultural Onsite Reports,
- iii) the offer to construct a fence to minimize impact on the adjacent farm property; and,
- iv) the creation of a turnaround at the end of Spur Road to prevent “dead-ending” a road at the border of an active agricultural property, thereby avoiding speculation of further subdivision of adjacent agricultural lands in the future.
- v) a copy of the February 14, 2018 letter from the Island Corridor Foundation which notes the unlikely and expensive nature of an application to request a legal access to cross the railway. A formal refusal of an application for a level crossing from the Island Corridor Foundation would be the most significant and compelling information which could be supplied to the Commission however this would be significantly more expensive and time consuming.
- vi) a letter from the Agricultural Advisory Committee supporting the proposal.
- vii) a letter from the property owner of the 5 acre lot adjacent to the 0.57 ha lot noting that they are not interested in purchasing the 0.57 ha area.

I am currently awaiting a response from the Island Corridor Foundation to an email in which I requested information on a rough percentage of permissions for crossings vs refusals in the area and an indication of the approximate costs for an application of that nature from submission to approval/refusal. They may not keep this information but I am hopeful that a conversation may unearth comments that could be useful.

In addition to the foregoing I suggest that the neighbouring owner of the property adjacent to the 0.57 ha lot be approached and asked if they might

be interested in purchasing this area. A letter stating that they are not interested would be a valuable addition to a reconsideration submission.

I also believe that approaching the Agricultural Advisory Committee of the Regional District of Nanaimo for a formal comment on the creation of the proposed 0.57 ha lot and its impact on area agriculture, would prove a valuable addition to this process.

The process for submitting a Request for Reconsideration is to prepare a letter addressing the points set out in the ALC's Reconsideration Policy and including all of the information which has been noted above. This should be accompanied by a plan of the proposed subdivision.

A Request for Reconsideration is evaluated by the Executive Committee of the ALC to determine if it meets the criteria for going forward to the Commission. Should the Request for Reconsideration not be accepted by the Executive Committee, or refused following Commission consideration, the only remaining option would be to initiate a new application for subdivision. I would not recommend this option as there will not be any compelling new information available to support it other than potentially a formal refusal to allow legal access across the tracks by the Island Corridor Foundation.

**ISLAND
CORRIDOR
FOUNDATION**

Box 375 Str A Nanaimo, BC V9R 5L3
office 250 754 7254 | fax 888 662 4197
islandrail.ca

February 14, 2018

YourLand Development
& Research Solutions

VIA Email

Dear, Sherry Gordon

Re: Level Road Crossing

In an effort to improve the safety of the Island railroad the Island Corridor Foundation is not granting additional level road crossings of the Victoria Subdivision without the applicant supplying extensive background data that clearly demonstrates there is no alternate route that does not involve crossing the railroad.

The Victoria Subdivision has one of the highest crossing counts per mile in the country.

In order to commence the due diligence process necessary for the Island Corridor Foundation (ICF) Board consideration please submit a non-refundable \$2000.00 plus GST fee, totalling \$2100.

We have attached our initial level road crossing checklist please review and send the checklist materials, and cheque to our office as one complete package. Incomplete applications will be returned before any review commences. Inactive applications over 6 months old will need to reapply.

If the ICF Board approves the application it will be conditional on technical and engineering approval by our rail operator Southern Rail Vancouver Island (SVI) to ensure that there is no negative impact on the safety of rail operation.

All costs of the review and approval process from either ICF or SVI will be the responsibility of the applicant. Costs could include a one time fee, annual crossing fees, as well as any legal, and site visit expenses.

Yours truly,



Graham Bruce
Chief Executive Officer
Island Corridor Foundation

INITIAL LEVEL ROAD CROSSING CHECKLIST

An applicant proposing to construct or alter a road crossing across the railway or right of way, should provide a scaled drawing showing the relevant information as outlined in the following checklist and indicate that the information is provided by marking the appropriate box.

- Overall aerial view of location and road network
- Existing crossings within a three mile radius of the location
- Significant topographical constraints, e.g. rivers, mountains
- Local road network and municipal transportation plans
- Regional transportation plans
- Development potential of property - existing zoning & subdivision requirements
- Detailed explanation of crossing use including details for future use if there are plans to change it
- Existing crossings that could be closed
- Road Authority documentation (provincial or municipal) accepting 100% of all signal & road costs, capital and maintenance.



Authorization for Agent

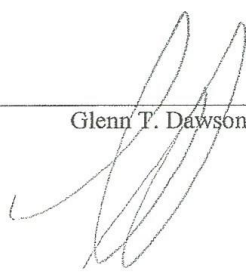
I, Glenn Dawson, hereby authorize Sherry Gordon of YourLand Development and Research Solutions to act as Agent on my behalf in all matters relating to researching the potential subdivision of the subject property within the Agricultural Land Reserve.

This letter authorizes the offices of the Agricultural Land Commission, the Regional District of Nanaimo and T.G. Hoyt B.C.L.S. to consult with Sherry Gordon and share all information contained in the legal files of Glenn Dawson as regards the property legally identified as:

PID 001-047-981

Lot 1, District Lot 62, Nanoose District, Plan 37368

Signed on the 7th day of November, 2017 at Saanich Victoria



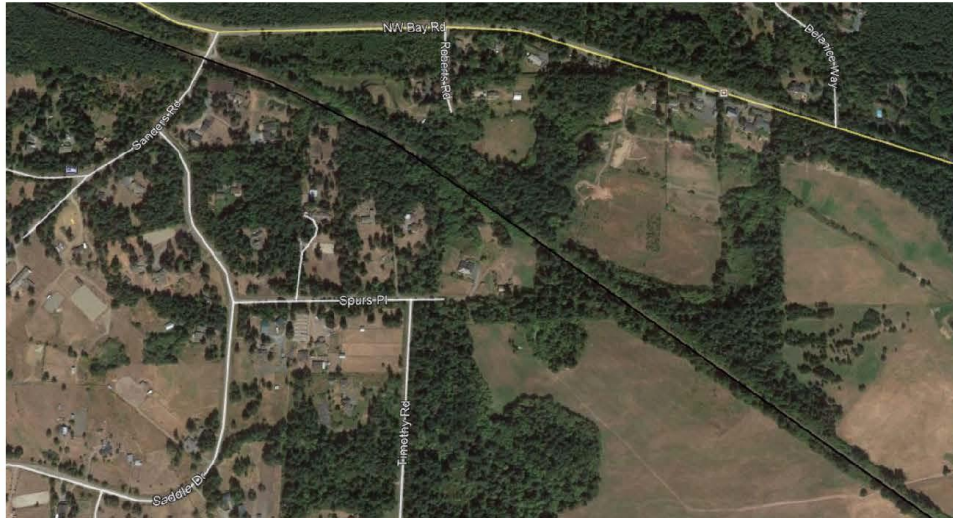
Glenn T. Dawson

P.O Box 45124 Ocean Park, Surrey, BC V4A 9L1
Phone: 604-417-4562
Email: YourLand@telus.net

Dawson – Nanaimo, BC

Agricultural Land Commission Application ID 56569 – Dawson

Photographs of railway and area under application



Satellite image of area surrounding property under application and 0.6 ha proposed for subdivision



Railway crossing on Sanders Drive – Property is located to left down the tracks.

Agricultural Land Commission Application ID 56569 – Dawson

Photographs of railway and area under application



Looking down railway tracks towards subject property – a 5-7 minute walk from this point.



Proposed 0.6 ha heavily treed lot on left and parent parcel on right.

Agricultural Land Commission Application ID 56569 – Dawson

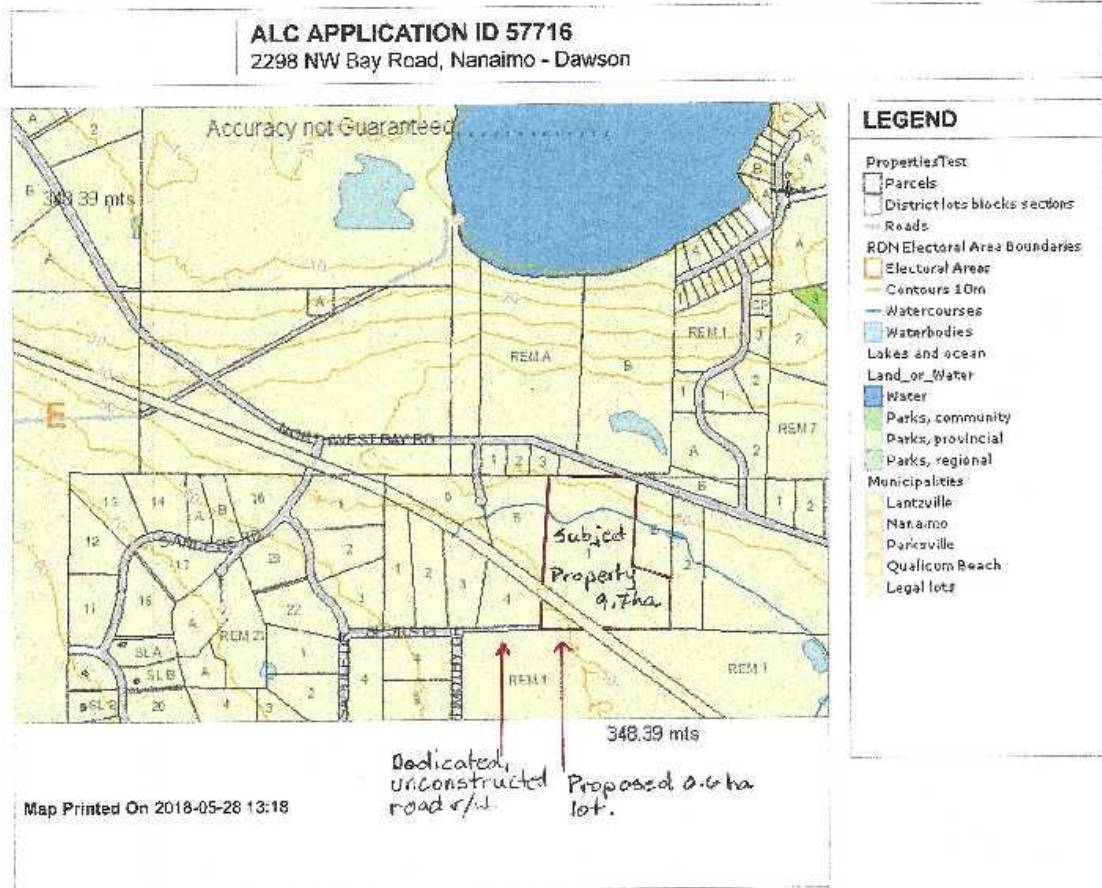
Photographs of railway and area under application



Standing water on parent parcel at bottom of railway right of way



2245 Spurs Place on left. This property is adjacent to 0.6 ha lot. Access would be an extension of Spurs Place along the fence line on the left into what is now trees and brush.



COMMENTS Illustrates ALC permitted s/c's in vicinity of proposed 0.6 ha lot and dedicated and unconstructed RAW accessing proposed lot.