

# Citizens for Responsible Development

P.O. Box 973

Rossland, BC V0G1Y0

May 4, 2008

Dear Mayor Smith and Councillors:

As you will be meeting Monday, May 5, for an in-depth discussion of the draft OCP, we would like to convey to you some of our concerns. Hopefully you share these concerns and will therefore give them particular attention.

We understand that the OCP is a general statement of the broad objectives and policies of our local government, and for this reason, "soft" language is often used; that is, words such as "consider", "encourage", or "should be". However, there are sections of the document which use firmer language, such as "ensure," "require," or "the City will." So, in sharing the following insights with you, we are operating on the premise that the OCP being a general statement of broad objectives and policies does not preclude the use of firm language in areas of paramount concern to the community.

Of comments received by our group from citizens who have read the draft OCP, more than half deal with protection of the watershed. Of those, the single greatest concern is that the language used in the draft is not firm enough to ensure protection of the town's watershed and water supply. Where definite guidelines are given, they are often modified by subsequent comments which make the guidelines in question less definite and more interpretative, or phrased in such a way as to leave the commitment to protection in doubt.

Example, on Page 59, Section 23.4, Policies-Potable Water, #4 states: "Update the watershed management plan including the establishment of watershed boundaries." In fact, there is at this point no watershed management plan, and there are existing watershed boundaries. Thus it would make more sense for this to read, "DEVELOP a watershed management plan and PROTECT existing watershed boundaries."

Example, on Page 80, Section 15: "Where a development proposal is situated within an environmentally sensitive area, an environmental review prepared by a qualified registered professional (eg RPBio, PAg, BCSLA/CSLA) will be required." Yet this very definite guideline is made subjective by the next sentence: "The requirement for an environmental review can be waived where the applicant, City government staff and federal and provincial government agencies agree that development impacts will be negligible."

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The availability of affordable housing is another area of great concern to citizens. Again, the language in the OCP is frequently so weak that it will not necessarily result in policies which will ensure this value.

For example, on page 38, Housing & Residential Lands, Objectives Section 16.1 uses firm language such as "ensure", "to provide" and "to design." But immediately thereafter, in the General Policies Section 16.2, the language switches to "consider" and "encourage." This obviously makes it possible for the general objectives stated in Section 16.2 to diverge substantially from the objectives stated in Section 16.1.

In the area of Governance, there were particular concerns with Section 24.2 Policy, #3, which states, "Review the development process and identify opportunities to streamline unnecessarily onerous steps and procedures." While this might be a good policy for the development of individual homes, we would not want to see requirements for environmental impact assessments and public consultation diminished in the name of "streamlining." Therefore we respectfully request that the OCP clarify that neither of these important steps and procedures will be minimized for the sake of "streamlining."

Readers of the draft OCP have indicated other areas of concern, and have offered specific suggestions for changes. However, knowing that you are only in the initial phases of analyzing the document, we do not wish to burden you with excessive detail. We are only requesting that you recognize that the watershed, water supply, and affordable housing do top the community's list of concerns, and that many of us would like to see stronger, more protective language used in relation to these issues.

Attached is a list of some of the comments we have received, consolidated for your convenience.

Sincerely,

Kathy Moore