



Date: October 25, 2011 **File:** SS-ALR-2011.3

To: Salt Spring Island Local Trust Committee

From: Justine Starke, Island Planner, Local Planning Services

CC: Richard Hannah, Fire Trustee, Salt Spring Island Fire Protection District
Michael Schubert, Chair, Salt Spring Island Fire Protection District

Re: Application for Non-farm Use in the Agricultural Land Reserve

Owner: Brinkworthy Properties, Ltd.

Applicant: Board of Trustees, Salt Spring Island Fire Protection District

Location: Lot 1, Sections 4 and 5, Range 2 east, North Salt Spring Island, Cowichan District,
Plan 2296 (135 Brinkworthy Road)

PID: 000-127-311

Preliminary Report:

Final Report:

THE PROPOSAL:

The proposal is to permit construction of a Fire Hall and Emergency Services Centre as a non-farm use within the province's Agricultural Land Reserve and accordingly this non-farm use must be approved by the Agricultural Land Commission (ALC).

Specifically, the application seeks to use a Portion A of the subject property (a 2 acre parcel donated from Tristar Communities Ltd. and Brinkworthy Properties Ltd.) for an Emergency Response Centre. The building will be between 12 000 -16 000 ft² in area and include an additional 30 000 ft² of parking. The Emergency Response Centre will house a Fire Hall, a Search and Rescue Centre, and eventually an Ambulance Hall. The facility will replace the existing, aging, Fire Hall, a temporary Search and Rescue Centre and create facilities for ambulances and an Emergency Operations Centre, in a central, accessible location. While the applicants have not yet had architectural drawings commissioned, plans have been submitted showing a similar application on a different site that has been superimposed onto the subject property (see Map 3: Example of Building Scheme).

The property meets all the technical requirements for such a facility. Other locations have been explored, and the applicants have concluded that there is not another location outside of the Agricultural Land Reserve that meets their criteria. There has been coordination with emergency responders and some preliminary consultation with the farming community. Please see Appendix 1 for copies of this correspondence and for a detailed rationale of the proposal.

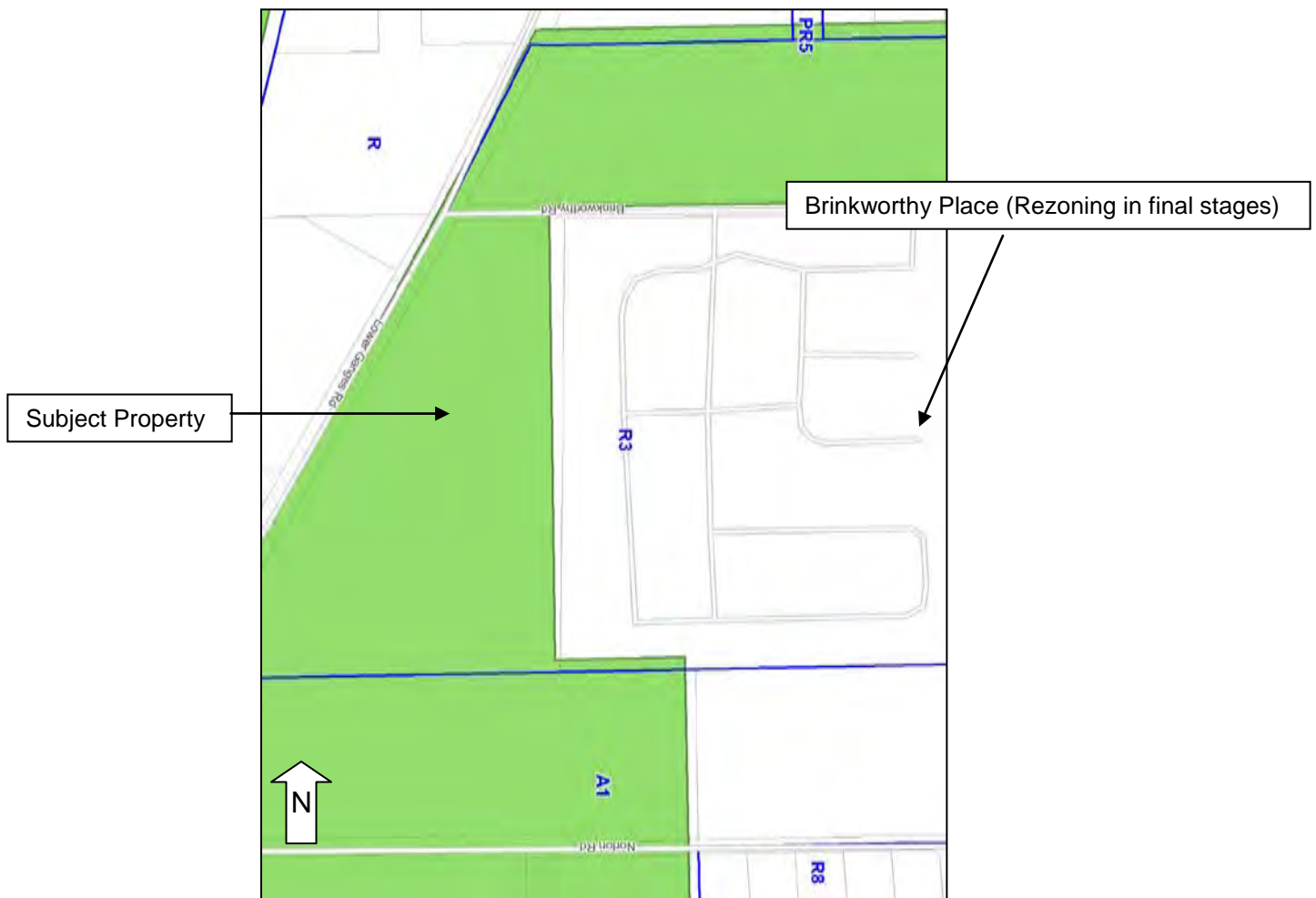
The Salt Spring Island Official Community Plan Policy B.6.2.2.1 directs the Local Trust Committee to seek advice from the Salt Spring Island Agricultural Advisory Committee on applications to the Agricultural Land Commission.

SITE DETAILS AND CONTEXT:

The parcel is located on Fulford Ganges Road, on a 2 acre parcel (Portion A) of a 13 acre parcel currently in the final stages of subdivision from Brinkworthy Place. Portion B is a BC Hydro Right of Way and Portion C is used as a hayfield, RV storage and barn. Please see Map 2.

The property is zoned R3 and is in the Agricultural Land Reserve (see green shading in Map 1 below). The surrounding properties are zoned Residential 3, to the east, Agricultural 1 to the north and south (ALR in green), and Rural to the west. The uses of adjacent properties include a commercial vineyard and other agricultural uses, BC Hydro yard and administrative building, and medium to high density residential (Brinkworthy Place).

Map 1:



Map 2: Subject Property with Portions A-C

Brinkworthy Place
Lot 1, Sections 4 and 5, Range 2 East, North Salt
Spring Island, Cowichan District, Plan 2296.

Scale - 1 : 750



Not all buildings are illustrated.



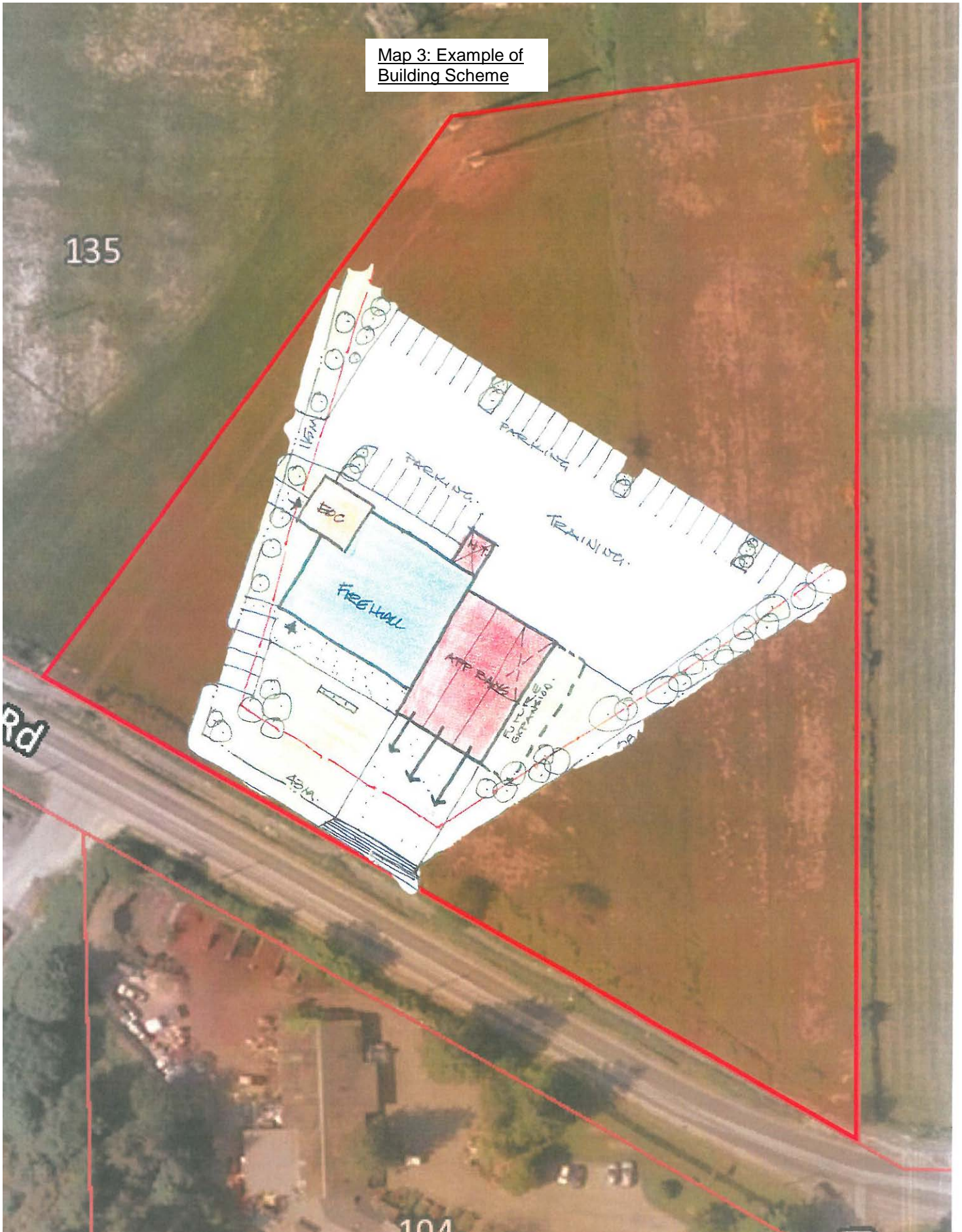
- LEGEND**
- Bearings are astronomic, derived from Plan
All distances are in metres and decimals thereof.
Some of the lot dimensions illustrated on this Plan might be derived from registered survey plans and not verified by measurements taken of the site.
Elevations are in metres.
The datum of elevations is Geodetic.
- ▲ Denotes spike or nail driven through numbered plastic tag
 - Spot Elevation.
 - Denotes tree
 - Standard Iron Post Found.
 - Non-Standard Round Iron Post Found.
 - ▣ Catch Basin
 - Utility pole
 - Fence

DESIGN NO. DRAWING NO. CREATED: 06/2007 SCALE HONED: 1:750 REVISED: A	PLAN Rem 3 4936	TITLE UNIT B-1300 Ketch Court, Cowichan, B.C. YORK CITY	BEESLEY ENGINEERING LTD. CONSULTING CIVIL & STRUCTURAL ENGINEERS 11000 FINE LINE BLVD
KEY PLAN		07.100-1 1 OF 4 REVISED: A	

Drawing Date: Jan. 9, 2008.

Gazetted as road June 16, 1955
See Plan 704 RW

Map 3: Example of Building Scheme



135

Rd

CURRENT PLANNING STATUS

Official Community Plan:

The Salt Spring Island Official Community Plan No. 434 designates Portion A of the property as A – Agriculture, and gives guidance for applications considered to benefit the community at large. The following OCP policies are considered applicable to this application:

B.6.2.1.4 To limit the non-farm use of agricultural land.

B.6.2.2.15 The Local Trust Committee could support applications to the Agricultural Land Commission for non-farm use or exclusion of land within the Agricultural Land Reserve in some situations where local farming or the greater community would benefit. Support for such applications should only be considered if the application has been referred to the Agricultural Advisory Committee and falls into one of the following categories:

d. the non-farm use or exclusion of property for essential community services, if the location of the service is limited by engineering constraints, or by strategic considerations such as those that determine the best location for an emergency response station, and the proponent has demonstrated that there is no suitable alternate, non-ALR property.

B.4.4 EMERGENCY RESPONSE FACILITIES AND SERVICES

B.4.4.1 OBJECTIVES

- B.4.4.1.1 To ensure that land use bylaws accommodate emergency response facilities in locations where response times are optimal for most of the community.
- B.4.4.1.2 To respect the strategic site selection processes undertaken by emergency response organizations.
- B.4.4.1.3 To reduce the neighbourhood impacts of emergency response stations and training facilities.
- B.4.4.1.4 To encourage shared use of emergency response facilities and land.

B.4.4.2 POLICIES

- B.4.4.2.1 The Local Trust Committee should retain local zoning to allow emergency response facilities in most zones. Standards for vegetation screening around the perimeter of emergency response properties should be retained.
- B.4.4.2.6 Should the Salt Spring Island Fire District wish to relocate its Ganges Firehall site, the Local Trust Committee should consider any proposals it might receive that would provide the District with land the District finds acceptable in exchange for higher density elsewhere, if the proposal results in the dedication of the Ganges Firehall site for public use. Land provided in this way is an eligible community amenity, which could be exchanged for a higher density of development as outlined in Appendix 3.

Land Use / Zoning Bylaw:

This property is zoned R3 (Residential 3), according to the Salt Spring Island Land Use Bylaw No. 355, and is entirely located in the Agricultural Land Reserve. The principal uses, buildings and structures in this zone pursuant to the Land Use Bylaw 355 are:

- 1) Single-family dwellings
- 2) Public Service Uses.

While the property is in the ALR, *Agriculture* is not listed as a permitted use by Bylaw 355.

The definition of “*Public Service*” is:

“*public service*” means the *use* of land, *buildings* or *structures* for the maintenance, repair or storage of vehicles, equipment or construction materials that are used solely for the provision, maintenance or repair of *public utilities* or *highways*, **and for *emergency response facilities* that are operated for the benefit of the general population of the island on which it is located** (emphasis added).

A rezoning application will not be required in order to allow for the intended non-farm use.

Development Permit Areas:

The subject property is not in a Development Permit Area.

STAFF COMMENTS:

This is an application that meets the needs of the community and meets the objectives of the Official Community Plan with reference to Emergency Response Facilities. While it does not give benefit to agriculture, OCP policies on development in the Agricultural Land Reserve make an exception for this kind of community service use, with the condition that, “*the location of the service is limited by engineering constraints, or by strategic considerations such as those that determine the best location for an emergency response station, and the proponent has demonstrated that there is no suitable alternate, non-ALR property.*” In the attached proposal (Appendix 1), the applicants have demonstrated that the site meets technical requirements for emergency response and the specific criteria of the fire department and that an “exhaustive and thorough” search has been conducted for an appropriate property that is outside of the ALR, with no success.

There have been concerns related to noise impacts on neighbouring properties as well as storm drainage impacts on the downstream channels during peak run-off season. (Please see the two letters in Appendix 2). It is recommended that a drainage plan designed to reduce peak flows off of the site be commissioned with recommendations to be implemented by way of covenant. It is also recommended that the applicants hold a Community Information Meeting to discuss ways to mitigate noise and other impacts. The meeting should be held before architectural drawings and a site plan are created so these plans can reflect community concerns; this should ideally be done prior to consideration of the application by the Agricultural Land Commission (ALC). Lastly, this proposal should be discussed by the Salt Spring Agricultural Advisory Committee (AAC) as per OCP policies.

The Agricultural Land Commission Act states that the local government must receive the application on behalf of the ALC and that the application may not proceed to the Commission unless authorized by resolution of the Local Trust Committee (LTC). Once the application has been reviewed by the AAC, the LTC essentially has three options when it considers an application of this type: 1) pass a resolution to forward the application to the ALC with the comment that it supports the application; 2) pass a resolution to forward the application to the ALC with no comment; or 3) pass a resolution to not forward the application (application is closed).

RECOMMENDATIONS:

THAT the Salt Spring Island Local Trust Committee **REFER** the application SS-ALR-2011.3 for Parcel A of Lot 1, Sections 4 and 5, Range 2 east, North Salt Spring Island, Cowichan District, Plan 2296 to the Agricultural Advisory Committee for review and comment (SSI Fire Protection District, 135 Brinkworthy Road).

THAT prior to final consideration of response to the Agricultural Land Commission, the Salt Spring Island Local Trust Committee request the applicant of SS-ALR-2011.3 for Parcel A of Lot 1, Sections 4 and 5, Range 2 east, North Salt Spring Island, Cowichan District, Plan 2296 (SSI Fire Protection District, 135 Brinkworthy Road) to submit a drainage report by an Professional Engineer with expertise in storm drainage which outlines a plan for reducing the storm water draining off of the site and that this plan be implemented by way of a covenant or other legal agreement.

THAT prior to final consideration of response to the Agricultural Land Commission, the Salt Spring Island Local Trust Committee encourage the applicants to hold a Community Information Meeting to discuss ways to mitigate noise and other impacts in the site plan and facility design prior to consideration of the application by the Salt Spring Island Local Trust Committee for forwarding the Agricultural Land Commission (ALC).

Respectfully prepared and submitted by:

Justine Starke, Island Planner

October 25, 2011

Date

Respectfully concurred by:

Leah Hartley, Regional Planning
Manager

October 25, 2011

Date

Appendix 1: Applicant proposal to construct emergency response centre

Appendix 2: Correspondence

Proposal to Construct a Fire Hall and Emergency Services Centre for Salt Spring Island

Introduction

The Salt Spring Island Fire Protection District seeks to build a new Fire Hall #1 to replace our aging and out-dated hall in Ganges. The existing hall was originally built in 1960 with a major addition in 1973. The existing facilities are now considered to be inadequate, seismically unsound and poorly located. There have been constant alterations, renovations and repairs over the intervening 50 years. The present hall is no longer large enough to support the staff and apparatus required for the operations of the Fire Protection District, operating as Salt Spring Island Fire-Rescue.

Rebuilding or replacing the existing hall on the present site is not feasible for two reasons: 1. the lot is too small to allow construction of adequate space for present operations let alone any future expansion; 2. the location of the existing hall in the centre of Ganges poses operational challenges due to congestion in the village. For example, volunteer firefighters, on whom we depend, sometimes have great difficulty getting to the Fire Hall and parking their vehicles in reasonable time to dispatch apparatus in response to emergency calls.

The trustees of The Salt Spring Island Fire Protection District decided some years ago to build a new hall outside of the core of Ganges, but within a 2 km radius so as to optimize our response time to the main commercial and institutional exposures in and around the village. We further determined that the location would be best north of Ganges as this is the direction of the vast majority of our emergency calls. It would also be close to the hospital, residential care homes and schools. The trustees also believe that it would be in the interest of the Island community to have as many emergency services operating from the same facility as possible. This would save on duplication of infrastructure and allows for efficient co-ordination between sister agencies during emergencies. To this end, the trustees have had discussions with Salt Spring Island Search and Rescue, BC Ambulance Service, the Salt Spring Island Emergency Operations Center and the

Salt Spring Island Amateur Radio Club (they assist in radio communications during emergencies).

At this time we have had positive response from all but BCAS (see attached letters). The trustees have taken the approach that this proposed facility will be the main operations center for the next 50 years and perhaps beyond, and to that end would like to have provision to add an ambulance station in the future.

Attached is an Architect's Schematic Site Sketch that was done for another site, 121 Norton Rd. superimposed on the proposed site to illustrate the scale of the development relative to the whole site. This scheme is approximately 11,500 sq. ft of building and allows for an additional 3000 to 4000 sq. ft. for future expansion. In addition, the scheme shows approximately 30,000 sq. ft. of parking, driveways, apron and sidewalks. We have not as yet done any actual architectural planning on this site, but would anticipate that a similar ratio of building to other developed areas would pertain here.

Current Proposal

The current proposal is to construct a Fire Hall and Emergency Services Centre for Salt Spring Island on donated land adjacent to Brinkworthy Place. This centre will house a Fire Hall, a Search and Rescue Centre, an Emergency Response Centre and eventually an Ambulance Hall, totaling between 12,000 and 16,000 sq ft. This facility will replace the existing, aging Fire Hall, a temporary Search and Rescue Centre and create facilities for Ambulances and an Emergency Operations Centre, all under one roof in a central, accessible location. The new facility will enhance the provision of Emergency Services for decades to come.

The property for location of the Centre is portion A, comprising 2 acres, of Lot 1 shown on the attached Plan. Portions A, B and C total approximately 13 acres with portion B being a Hydro right of way and portion C used as a hayfield, RV storage and barn. The property has the required services of power, water and sewer and direct access to a major road. It meets all the technical requirements for such a facility.

The technical requirements include:

- a minimum of two acres to permit the construction of a building 12,000 to 16,000 sq ft with adequate room for turning of fire trucks (turning radius typically 15 metres) and parking for up to 40 volunteer firefighters, up to 10 career staff and parking for visitors up to total of 80 spaces;
- connection to municipal water and sewer system;
- availability of 3-phase power;
- direct access to a major road, with good access to alternative routes;
- relatively flat useable land in an area with low urban density;
- an ability to meet National Fire Protection Association and the Fire Underwriters Agency minimum Suburban and Urban response standards;
- an ability to meet response times to future development;
- have minimal radio communications interference (testing has been conducted)
- be in a safe location for the installation of Emergency Response traffic control lights;
- meet LEEDS and good environmental management standards;

Several properties in the area have been examined and considered for such a facility and some met all the desired criteria. The properties given serious consideration in past year include:

- 255 Lower Ganges Road. This property meets all of the criteria outlined above; however the owners were only willing to consider selling up to 1 acre of the property, which is insufficient to meet our needs;
- 120 Blain Road. This property is occupied by the Royal Canadian Legion and consideration was given to leasing the rear, relatively unused portion of the property. Discussions were made with the local executive and a presentation was made to the members at large. However, it was eventually realized that all of the property would be needed and this was not acceptable to the Legion or the Fire District.

- 184 Kings Lane . This property was available for sale at \$1.5 million and it met most of the criteria for a Fire Hall. However, the high cost was not felt to be acceptable to the tax payer and the property has subsequently been built upon.
- 121 Norton Road. This property met all of the technical requirements. However the owner was not able to come to an agreement with the Fire District due to land swap and density considerations. The property is also in the ALR

Many other properties have been examined over the last five years including: property at the end of Drake Road; at the corner of Drake and Fulford/Ganges Road; on Rainbow Road; Knott Place, Park Drive and the Highways Yard adjacent to Hall 3 at the junction of North End Road and Vesuvius Bay Road. Discussions were also held for the purchase the BC Hydro Yard on Lower Ganges Road, with help from our local MLA Murray Coell. This proposal was turned down at the ministerial level.

In February 2008 the location of new Fire Hall at 300 Robinson Road was proposed. This property met all of the technical criteria. However, purchase of this property was defeated in a referendum in April 2008. We believe that an exhaustive and thorough search has been conducted for an appropriate property. The generous offer of donation of 2 acres of land by Tristar Communities Ltd. and Brinkworthy Properties Ltd., for land located in a prime situation, meeting all of our technical criteria, we believe is a major and perhaps final opportunity for the construction of a new Fire Hall on Salt Spring Island.

Public Consultation

Preliminary discussions have been conducted with the Farmers Institute, the residents of Brinkworthy Place and the immediate neighbours of the Brinkworthy Place location. A letter from the Farmers Institute in response to our discussions is attached. A meeting with the residents of Brinkworthy Place was held in April of 2010. About 40 residents attended and the majority of those did not raise any objections to the location of a fire hall next to their property. Some welcomed the

prospect of having better and faster response to their fire and emergency needs. Discussions were had with one owner of the vineyard located next to the property. The concerns raised consist mainly of visual screening, which can be well met. Subsequent to these discussions it was announced at the 18th April 2011 meeting of the Fire District Trustees that the subject property was the preferred choice for the location a new Fire Hall. A poll published in the Driftwood and 4th May 2011 show a ratio of 106 to 11 in favour of the location of a Fire Hall on the subject property.

Environmental Considerations

The property is bordered to the north and west by a Hydro right of way and an extension of the property that may continue to be used as a hay field. The east border comprises a vineyard on an elevation to the property. A raised berm planted with trees and shrubs will separate the two properties with a walkway providing pedestrian access to Brinkworthy Estates. The south border is a major road. The proposed facility will be constructed to highest environmental standards and all efforts will be made to ensure that it will have minimal impact on the surrounding properties. Drainage is towards the main road and existing drains and sewers. It is not anticipated that there will be any deleterious run off as no noxious chemicals or substances will be used at the site. A drainage report will be commissioned, if required by the Agricultural Advisory Committee to the LTC. The building will primarily be used for the housing of emergency vehicles and offices. Noise impact and visual impact will be minimal due to extensive screening and careful placement of the facility. Creation of dust, odours and obstruction of trespass will not occur.

There will not be need to create or widen existing roads and the proposal will not raise expectations for similar approvals on surrounding land. The removal of top soil will be minimized and any good quality topsoil will be moved to the rest of property or taken to existing registered farms on the Island to enhance their agricultural activities.

In summary, the property that is the subject of this application has been offered by donation to the Fire District. This represents a substantial savings of a least half a million dollars to the taxpayer. It is at the northern limit of a location meeting the criteria for a Fire Hall and Emergency Services Centre. Despite extensive searching over the last five years no other suitable land has been located in within the required location (i.e. between central Ganges and the intersection of Lower Ganges and Atkins Roads) that is outside the ALR. The commissioning of this Fire Hall and Emergency Service Centre is designed to meet the needs of the community for the next 50 years. This property does meet the requirements of the Official Community Plan in that it would be “non-farm use or exclusion of property for essential community services”. (B.6.2.2.15(d))

135

ges Rd



104

Rd



SALT SPRING ISLAND SEARCH AND RESCUE

261 Fulford-Ganges Rd., Salt Spring Island, B.C., Canada, V8K 2K6, (250) 537-0698

March 15, 2011



Chief Tom Bremner
Salt Spring Fire Rescue

Chief,

This letter will confirm SAR's enthusiastic endorsement of your vision of a new fire hall in which Salt Spring Search and Rescue would have a permanent home. We believe that your concept is of great strategic as well as practical value to all of Salt Spring's residents.

Please accept our thanks and our support for your very strong gesture of community support!

Sincerely,

A handwritten signature in cursive script that reads "C. Hamilton".

Charles Hamilton
Search Manager, SSI SAR

Chief Tom Bremner

From: Travis Whiting [twhiting@crd.bc.ca]
Sent: April-06-11 10:56 AM
To: Tom Bremner
Subject: [SPAM]New Fire Hall Lease

RECEIVED
APR 7 10 56 AM '11
LB

Hi Chief,

This is to follow up on our discussions regarding your proposed new hall. Currently the Emergency Program leases a commercial space for the local SSI EOC. The space has been in use for a number of years, but we do have some concerns around the location, largely due to the fact that the building is not built to post disaster standards. It also has some limitations in communications. Once you are at the design and building stage of your new hall, the emergency program would be very interested in meeting to discuss the potential of leasing space from you, and working with you on developing communications capacity at the new location. The opportunity to locate the operations centre in a post disaster building would fit well with our needs, and as the emergency program does interact largely with the fire service and other first responders as a level of support, and interaction with outside agencies, colocation of our operations with you would be a good fit.

I look forward to meeting with you once the decision to move forward on construction has been made, so we can look at potential options for working together.

Cheers,

Travis Whiting
Senior Manager, Protective Services
Capital Regional District
Ph: (250)360-3186 Fax: (250)360-3232
625 Fisgard St., Victoria, BC, V8W 2S6
e-mail: twhiting@crd.bc.ca

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Thank you.

Please consider the environment before printing this email.

SALT SPRING ISLAND AMATEUR RADIO CLUB

706 MT. BELCHER HEIGHTS
SALT SPRING ISLAND, BC V8K 2J3

March 18, 2011

Salt Spring Fire / Rescue
105 Lower Ganges Road
Salt Spring Island, BC Canada V8K 2T1

Attn.: Chief Tom Bremner

Re: New Fire Hall Partnership

Dear Chief Bremner:

With the need for the replacement of Fire Hall #1 in Ganges becoming more apparent, there have been recent discussions about a multiple entity, multiple use facility and about a contributing partnership relationship of first response and quasi first response agencies and related groups that would be housed or use that facility.

As the Club has long been considered a quasi first response entity, being tasked with providing skilled radio operators and staffing to the island's emergency operations center and to the fire department, our thoughts were invited. We appreciate this opportunity to provide our comments.

At this time, the Club supports, in principal, the concept of multiple response and support groups being operationally based within the same facility with long term rental or other arrangements being made to support the capital costs of construction and equipping the building. The Club would like to be included in such a facility but it must be understood that the Club receives no public or substantial private funds. As such it would not be able to directly contribute financially but stands willing to contribute in other ways such as with the use of Club equipment and expertise and through our society status to assist in seeking grants and other forms of financial and material contribution.

Should this multiple entity facility become a reality we would request that we be allowed to contribute our ideas, experience, and expertise toward the planning of the particular areas in the building where our duties and activities would be actively located.

Please let us know how we can be of further assistance as this goes forward.

Sincerely


Jon Healey
President

The Hannah's

From: "Iris Beck" <ibeck@saltspringfire.com>
To: "J. Bracher" <jbracher@telus.net>
Sent: Friday, April 29, 2011 11:29 AM
Subject: RE: Brinkworthy Gathering Wednesday, April 27th
Good Morning John & Judi,

Thank you for your email & your support! I have passed it on to the Board of Trustees, as well as Chief Bremner. It was our pleasure to attend the Brinkworthy Gathering & answer questions, as well as provide accurate information to the residents of Brinkworthy. Please feel free to contact us again should you have any other questions or comments.

Sincerely,

Iris Beck
Administrative Assistant
Salt Spring Island Fire Rescue
Phone: (250) 537-2531
Fax (250)537-2507
ibeck@saltspringfire.com



www.saltspringfire.com

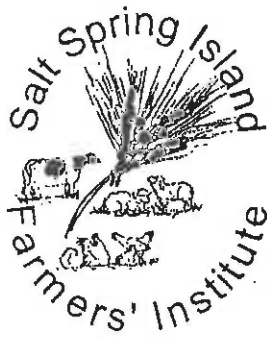
 Please consider the environment before printing this e-mail or its attachment(s)

From: J. Bracher [redacted]
Sent: Friday, April 29, 2011 10:56
To: tbremner@saltspringfire.com
Cc: trustees@saltspringfire.com; ibeck@saltspringfire.com
Subject: Brinkworthy Gathering Wednesday, April 27th

We would like to express our appreciation to you, Richard Hannah and Iris for taking the time to attend the Brinkworthy Gathering on Wednesday and for giving us accurate information on the proposed Brinkworthy location for a new Firehall, as well as several other important facts.

We hope you will be successful in making this a reality.

John & Judi Bracher
[redacted]



RECEIVED
2011/05/17

Salt Spring Island Farmers' Institute

Box 661, Salt Spring Island, BC V8K 2W3 ♦ Phone (250) 537-4755

E-mail: ssifi@shaw.ca ♦ Website: www.ssifi.org

May 17, 2011

Salt Spring Island Fire Protection District
Board of Trustees
c/o Ganges Fire Hall
105 Lower Ganges Road,
Salt Spring Island, B. C.
V8K 2G1

Dear Michael Schubart, Chairperson

Re : Location of New Fire Hall in the Agricultural Land Reserve

Thank you for your presentation on the proposed new fire hall location to the Salt Spring Island Farmers' Institute Board of Directors, April 12, 2011. We very much appreciated the open discussion on your plans.

As an agricultural based organization, the Farmers' Institute is committed to represent and protect the interests of agriculture on this island. We understand the well documented need for a new fire hall, the hard work undertaken by your board over the years to find a solution and the added benefit of obtaining land for no fee. However, your decision to locate fire hall in the Agricultural Land Reserve (ALR) presents us with a problem.

During the public consultation process of the Salt Spring Island *Area Farm Plan*, there were strong opinions expressed in support of a *no net loss* of ALR generally and farm land within the ALR. When land is removed or non-farm use is approved in the ALR on Salt Spring Island, potential food producing land on the island is *reduced* and lost. We support the no net loss policy of the *Area Farm Plan*. Currently, the Salt Spring Island *Official Community Plan (OCP)* allows for non-farm use of ALR or rezoning applications on the basis of public *essential* services and other considerations. A fire protection facility would arguably meet the criteria of *essential* community services, a definition that should be limited to public safety and health.

Should the Islands Trust endorse your plans and forward your proposal to the Agricultural Land Commission for final approval, the Farmers' Institute will strongly recommend that the fire district project take every and all measures to minimize impacts, such as noise, runoff, odour etc. on adjacent producing agricultural properties. Approval of this project must be conditional on the implementation of proper environmental management systems to protect the active neighbouring agricultural properties.

Sincerely,


Rick Vipond
President

[Redacted]
Brinkworthy Road,
[Redacted]

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SEP 13 2011
ISLANDS TRUST

3 Sept 2011

Dear Trustees,

As you consider this massive 'Emergency' project, proposed for part of the Brinkworthy field, I would like you, to not only be mindful of my last letter voicing concerns; but also of how you would feel if this complex were to be placed at the end of your own back yards.

Unable to attend your next meeting, I hope that this matter will be handled with your usual caution, and concern for all those who will be deeply impacted by this massive increase of strident noise levels.

Yours sincerely,

[Redacted Signature]

Pam Adams.

Best,
Christine

-----Original Message-----

From: Philip Grange [redacted]
Sent: September 12, 2011 11:04 AM
To: george ehrling; Christine Torgrimson
Cc: KATHY REIMER
Subject: BRINKWORTHY PROPERTY--STORMWATER RUNOFF

DEAR GEORGE AND CHRISTINE,

I recently learned that changes are proposed to the Land Use of the Brinkworthy property, and just want to comment on the surface water runoff from this area.

This property lies almost entirely within the Swanson creek watershed which discharges into Ganges creek and Harbour

This narrow channel runs all the way through the upper village as well as beside the Credit Union and the Barb's Bakery building, which estuary section is of course affected by the tidal elevations in the harbour.

The Brinkworthy property is at the top of this contributing watershed, and has a considerable area of impervious surface in it's buildings and road system.

The proposal to allow a Firehall in the area would add to that impervious area and to the peak runoff generated during storms.

The property has some large open areas and fields which could lend themselves to a possible peak runoff attenuation facility such as a pond with live storage, which could have a considerable positive effect in reducing peak flows all the way downstream and particularly within the lower village.

The "rain garden" techniques could also be considered which effect promotes groundwater recharge for a healthier watershed and possible summer stream flows in lower reaches.

I suggest therefore that an engineering study be requested in any re- zoning of lands to minimise the downstream effects, on ditch and stream channels on public and private properties , of the whole property from it's present and proposed impervious surfaces.

yours sincerely
Philip J .Grange P Eng.



