



Campbell River Environmental Committee (CREC)
2353 Dolly Varden Road, Campbell River, BC V9W 4W5

July 8, 2026

SENT VIA EMAIL

Dear Mayor and Council:

RE: Campbell River Environmental Committee's (CREC)

Draft Official Community Plan (OCP) Comments

After reading the Draft OCP, CREC provides the following comments.

Regarding the lack of public hearings for development under BC Bill 44, Premier David Eby stated that the public gives input at Official Community Plan (OCP) time. There has been no public open house for this current updated draft. Now public input is five minutes at a public hearing for five years of living with an OCP skewed toward growth/development while sacrificing the environment, wetlands and streams.

Further preferential treatment toward growth/development is shown by Council's decision at the June 3, 2026 Council meeting to have the draft OCP reviewed by the development community with no review by the environmental community or others.

The use of the Professional Reliance Model (PRM) for development with no City environmental review is not an acceptable choice. Mark Haddock's 2018 Professional Reliance Review for the province of BC identified many issues with the use of the PRM.¹ Most of his recommendations have not been met. City oversight is needed to identify any errors and/or omissions in a development plan.

Very concerning to CREC is point 2.5-4 in the General Environmental Development Permit Area, Section 7 of the draft OCP which states that if a Qualified Environmental Professional (QEP) confirms there are no Sensitive Areas on a parcel identified on a Development Permit Area (DPA) map, then the applicant and the City shall treat the property as though it is not in the applicable DPA. Given that the QEP is hired by the applicant, would this not be a conflict of interest?

If they are to process and sign off on development applications, appropriately-qualified City staff must review applications and conduct site visits. In recent years, many developments have suffered erosion and sediment controls that failed in times of heavy rain, despite QEP involvement. We know that Campbell River experiences heavy rains every November and January so it should not be too difficult to plan for.

The Development Permit Area for Bald Eagle and Great Blue Heron nest trees needs to include all protections previously given in the existing OCP to ensure nest trees remain as healthy as possible and don't become hazard trees to new development.

Some wetlands identified by QEPs and on previous OCP maps are absent from the Draft OCP maps (e.g. wetlands at the headwaters of Simms Creek between Evergreen and Merecroft Roads and at 1650 Galerno Road). Mapping of wetlands and other Environmentally Sensitive Areas (ESAs) are used and relied on by developers, all City departments and the public. Accurate and up-to date mapping is critical to save taxpayers and developers money, streamline City processes, reduce environmental harm, and stay in regulatory compliance. See attached.

The OCP recognizes that the environment is an asset to be used for servicing. The number of housing units to be built is known, but there is no plan to identify the number of wetlands in the city. Environmentally Sensitive and Natural Areas need to be inventoried and included in a Natural Areas Asset Management Plan. These natural assets make for a high quality of living in Campbell River. Natural areas provide services (such as stormwater attenuation and treatment) that are often more affordable than human-made infrastructure. We are concerned that the very identity of our beautiful "Salmon Capital of the World" is being endangered by inadequate consideration for the environment and that controls such as environmental development permit areas needed to reduce environmental harm during development are being weakened.

Please reinstate all environmental protections into the Draft OCP before adoption and ensure mapping is both up to date and accurate.

Yours sincerely,

LeRoy McFarlane, President

Attachments (maps)

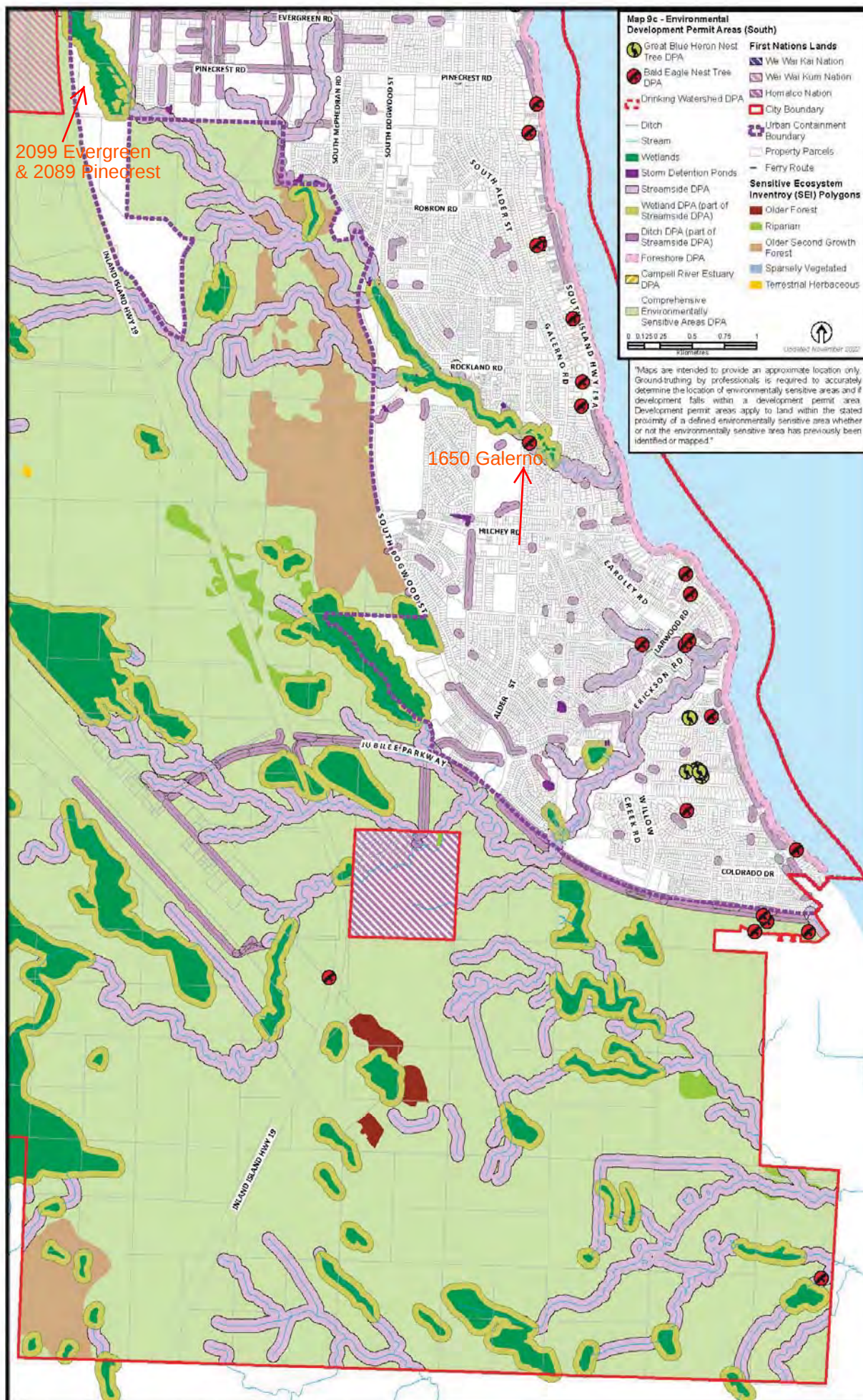
Reference:

1. https://www2.gov.bc.ca/assets/gov/environment/natural-resource-policy-legislation/professional-reliance/professional_reliance_review_final_report.pdf

Attachment 1: Maps

Map 1: Pre 2023 City SOCP Maps showing wetlands at 2099 Evergreen Rd., 2099 Pinecrest Rd. and 1650 Galerno Rd.

Map 2: New Draft OCP Map. No wetlands shown at 2099 Evergreen Rd and 2089 Pinecrest Rd. Not accurate wetlands shown at 1650 Galerno Rd. Map is Difficult to read.





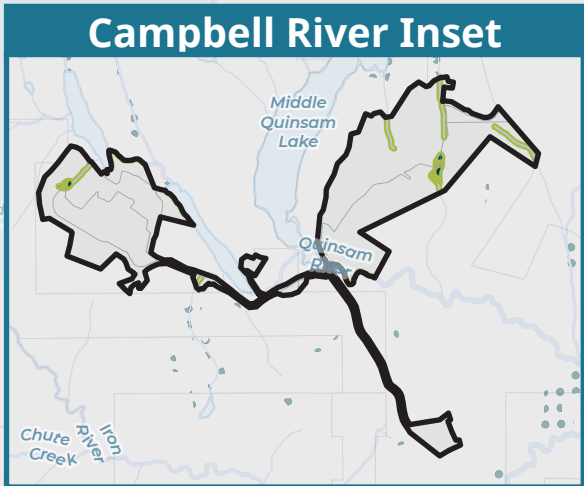
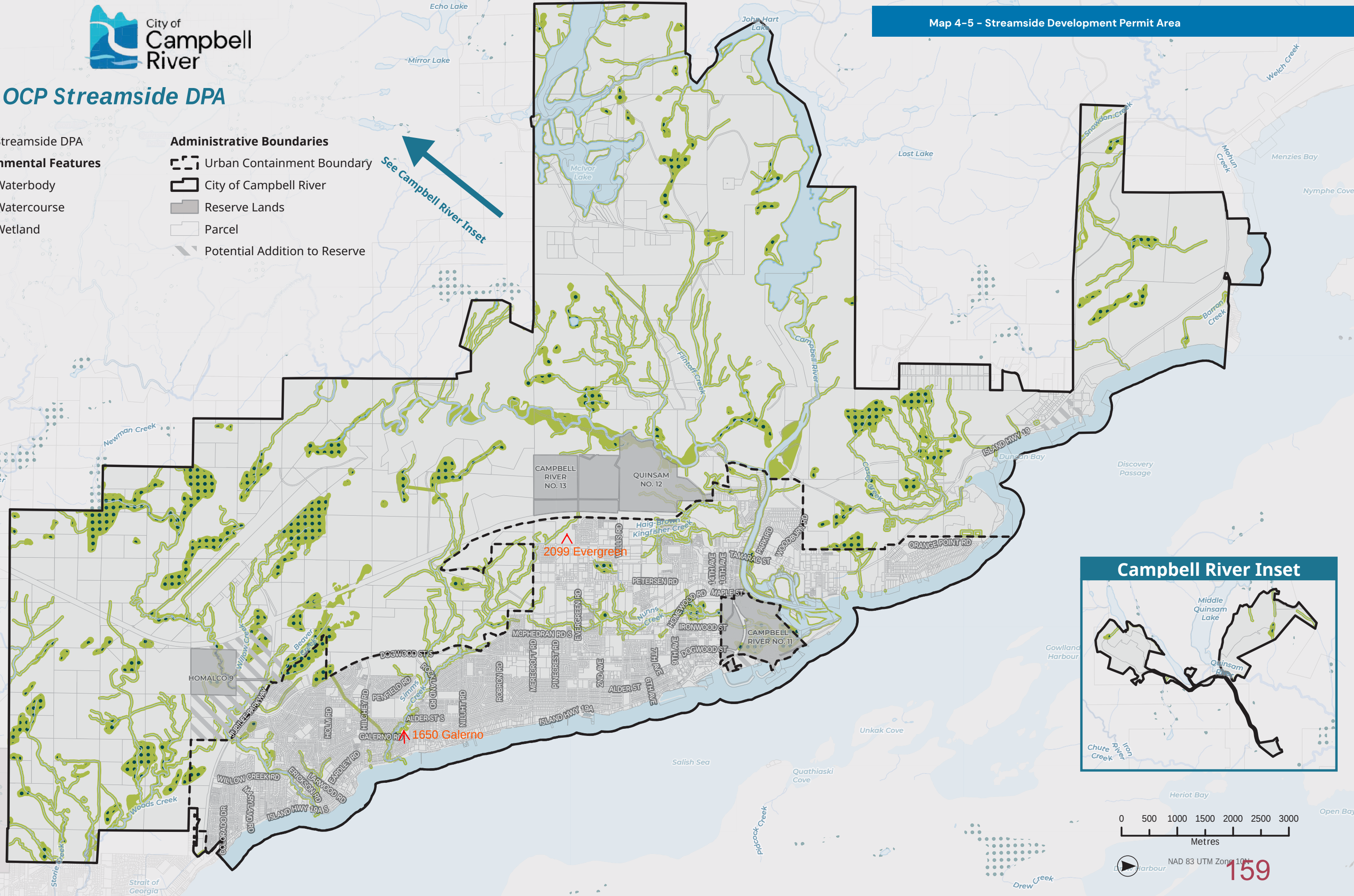
OCP Streamside DPA

- Streams**
- Streams
- Environmental Features**
- Waterbody
 - Watercourse
 - Wetland

- Administrative Boundaries**
- Urban Containment Boundary
 - City of Campbell River
 - Reserve Lands
 - Parcel
 - Potential Addition to Reserve

See Campbell River Inset

Map 4-5 - Streamside Development Permit Area



0 500 1000 1500 2000 2500 3000
Metres



NAD 83 UTM Zone 10N