

1.0 PROJECT BACKGROUND

The City of Campbell River is proposing amendments to the Official Community Plan's (OCP) Hazard Conditions (Steep Slopes) Development Permit Area technical guidelines and exemptions to meet professional practice guidelines set by the Engineers and Geoscientists of BC, to improve human safety and reduce the risk of landslide. The amendment bylaw has received first and second readings and a public hearing was held in July 2022.

After the public hearing, Council directed staff to conduct additional engagement to provide more information about the proposed amendments with a focus on the exemption criteria for vegetation management, development permit and exemption processes. To achieve this direction, a series of documents and an exemption form were produced to streamline vegetation management requests, website updates were completed including the development of a Steep Slopes project page on Get Involved Campbell River and two information events were held in June 2023.

2.0 INFORMATION EVENT GOALS

The goal of the June 2023 information events was to share information about the proposed steep slope regulatory changes and the process undertaken to date, to help the public better understand steep slopes requirements and the need for updates to the regulation. The focus of these events was at the INFORM level on the International Association of Public Participation (IAP2) spectrum for public engagement.

Increasing level of public involvement in decision-making

INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Provide balanced and objective information to residents	Obtain feedback on analysis, alternatives and/or decisions from residents	Work directly with residents to address concerns	Partner with residents to develop a preferred solution	Place final decision making in the hands of residents

More specifically, goals included:

1. Report back to the community about the amendment updates and process.
2. Explain the need to update guidelines and exemptions to reflect industry landslide knowledge.
3. Explain exemptions, development permits and application processes.
4. Respond to questions about recent landslide activity in the area.
5. Increase understanding of the shared responsibility between the City and residents to protect slope stability.

3.0 APPROACH

The two open house information events were held on:

- Thursday, June 22, 6-8 pm at the Campbell River Community Centre
- Tuesday, June 27, 3-5 pm at the Campbell River Community Centre

A drop-in style format was used to encourage participants to come when convenient. There were five members of the project team, including representatives from Long Range Planning and Sustainability, Capital works, Operations (Liquid Waste Services and Arboriculture) and Development Services, available to answer questions and hear public feedback. Ten information boards were on display, including information on:

- Why it's important to protect steep slopes
- Definition of steep slopes and buffer areas
- Work completed on the project to date (including public engagement)
- Presentation of the amendments
- What is a development permit area
- Exemptions table
- How to obtain an exemption
- Tree and vegetation maintenance Q&A and property Q&A

A series of information materials and “how to” documents were also available for takeaway at the events, including:

- Backgrounder
- Exemptions form
- Exemptions guide
- Exemptions table
- Map of affected area

Display/information materials were posted to the Get Involved Campbell River project webpage (created as part of this engagement), following the events. Feedback forms were also available to complete, both in person and online. The feedback form prompted attendees to include any outstanding questions on the proposed regulatory amendments, and to share suggestions to improve the vegetation management exemption form.

4.0 PROMOTION

Campbell River residents within the steep slope areas were invited to attend the events via traditional media advertising (print, and radio), social media posts for the City of CR Facebook account, direct mailouts to property owners within steep slope areas (1,678 total mailed) and media release.

Event details were also posted on campbellriver.ca/steep-slopes.

5.0 EVENTS SUMMARY

The events saw over 250 people attend between the two days – an excellent turnout highlighting the public interest in this topic. Eight feedback forms were submitted online, four were submitted delivered to City Hall and 33 in person. Additional enquiries came by phone and email and three letters were submitted to Mayor and Council. Staff were able to get a sense of people's understanding of the changes, how to better share information and in what areas people require more explanation.



The feedback received is summarized into key themes below, followed by potential solutions to some of the issues raised during the engagement period. Appendix 1 summarizes the feedback in detail, providing comments and answers to the letters, emails, phone calls, feedback forms and sticky notes arising from the information sessions.

6.0 KEY THEMES – WHAT WE HEARD

1. EXISTING DRAINAGE

An overarching strong message is that the proposed amendments do not address existing conditions related to drainage around, and on steep slopes. This is similar to the concerns expressed during the public hearing in July 2022 and these concerns were amplified after the landslide in 2023 between Ash Street and the Island Highway. Residents are looking to the City to address existing infrastructure that they feel is contributing to landslide risks, conduct assessments to understand groundwater movement including the location of springs, work to provide stormwater connections to City infrastructure where none exist and to assist private property owners with drainage solutions on their property.

Residents and developers indicated that groundwater flows and other existing conditions are too complex and overwhelming to be addressed by landowners and strata councils on their individual properties. Additionally, many felt that ongoing development and the climate crisis are intensifying groundwater flows and exacerbating drainage issues and that these issues are best addressed at a government level.

Further, some residents want to be included in a working group or attend workshops to share information on slope instability issues. Others near the most recent landslide want the City to assist with the stabilization of that slope and address/manage the spring flowing through private property down the bank and to the Island Highway.

Qualified Professionals and staff identified a need for professionals to have greater access to existing landslide reports to inform new landslide assessments, efficiently process development applicants and to support technical expectations of professionals by the Engineers and Geoscientists of BC.

POTENTIAL SOLUTIONS:

To address existing conditions, staff are researching potential funding sources including the Community Emergency preparedness Fund for Council consideration. This provincial funding source administered through the Union of BC Municipalities is intended to support First Nations and local governments to better prepare for disasters and reduce risks from natural hazards in a changing climate.

City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model that would help solidify levels of service, and a comprehensive 10-year Stormwater Capital Plan based on asset renewal and risk mitigation analyses. Such an approach could take into account local context such as drainage servicing along the top of steep slopes.

Any groundwater and hydrogeological studies completed in relation to drainage on or near steep slopes would help to inform landslide assessments conducted for private development.

2. VEGETATION MANAGEMENT ON STEEP SLOPES UNDER THE EXEMPTION CRITERIA

As expressed during the earlier phases of the project, many residents along the top of steep slopes felt that the exemptions for vegetation are too strict and misguided. Given the perception that the real issue is drainage, the focus on trees was thought to be unjustified and that this unnecessarily fetters wide-open views. Notably, these objections were made in relation to the exemption criteria only and not in relation to the development permit guidelines.

In contrast, a few of the Qualified Professionals felt that the guidelines and exemptions seemed reasonable and in keeping with the industry guidelines for landslide assessments. When triggered for site development, the steep slope guidelines span the range of technical considerations for the hazard analysis, including site topography, geology, hydrology, hydrogeology, site clearing and grading requirements, all aspects of existing drainage as well as vegetation management. Some of the professionals expressed concern that the exemption criteria do not address slopes that already lack tree cover as there are no provisions to require the establishment of recruitment vegetation.

Some participants found the proposed exemption form for vegetation management and the supporting guide helpful. Others cited an overly bureaucratic complex process and wondered how the City would be able to administer the applications in a timely fashion. In addition, the requirement to retain a certified arborist was felt to be unnecessary and expensive, and why couldn't the City arborist provide the necessary assessments on private properties. There was a desire for the City to educate various tree care professionals and companies to ensure they understand the City's bylaws and regulations.

Potential Solutions:

After the first round of public and stakeholder engagement, the exemption criteria permitting vegetation management on steep slopes were broadened in consultation with technical advisors. No further broadening of vegetation criteria was proposed or is recommended as this would result in a mismatch with the technical development permit guidelines.

Qualified Professionals were invited to the information sessions. Should the amendments proceed, additional workshops could be developed for the tree care industry.

A number of suggestions were made to improve the clarity of the exemption form and supporting documents to support the administration of the exemption criteria. These edits will be incorporated should Council endorse the amendments.

Many of those who objected didn't realize that the existing exemption criteria already require the sign off of a certified

arborist and that a version of the exemption form is already in use. The exemption forms allow for the consistent collection of information and most completed application forms are being processed within a few days. Although the City's certified arborist does not have the capacity to conduct assessments on private property, the position works closely with development services to review applications and works with certified professionals to help them understand the City's requirements.

3. BEST PRACTICES FOR STABILIZING STEEP SLOPES WITH VEGETATION

Many participants at the events wanted information and expertise on the best plant, shrub and tree species to help stabilize surface soils on their steep slope and approaches to get rid of invasive blackberry. As opposed to everyone undertaking restoration from scratch, there was a keen desire for the City to help landowners through the development of educational materials and the compilation of best management practices, assemble a list of Qualified Professionals experienced in slope remediation, provide site-specific expertise and to source plant material. Some participants felt that the City should also pay for and install plants on privately owned steep slopes.

Potential Solutions:

Planting vegetation and managing invasive plants are activities that are currently permitted under the existing exemption criteria under the direction of a QEP and this exemption is proposed to carry forward.

Operational staff have started to assemble a vegetation list appropriate for slopes and best management practices that could be used as a resource for those wishing to remediate slopes. Should funding become available, these materials could be formalized and published as a resource for the community.

4. WILDFIRE RISK ON STEEP SLOPES

A number of participants wanted to see wildfire guidelines included in the proposed steep slope amendments. In some cases, it appeared that the driving concern was the fire risk posed by standing vegetation and trees. For others the concern was the increased fuel load created when branch and vegetation debris from maintenance activities are left on the slope. There were also requests for the City to clean up debris on publicly owned slope areas to reduce fire risk.

Noting that living root structures contribute to soil stability and integrity on steep slopes, the City's Fire Chief considers standing green timber as a reduced hazard. However, numerous dead branches and downed trees on slopes are ladder fuels, which propagate fire and increase the risk of tree crown fires.

Potential Solutions:

The proposed amendments to the exemption criteria require the removal of larger cut branches arising from maintenance activities from the slope at the time of cutting (where it is safe to do so). This guideline was introduced to prevent existing understorey vegetation from being smothered by debris as these plants assist with soil stability and guard against surface erosion. This guideline also supports fire smart principles.

Currently, the Official Community Plan contains an Interface Fire Hazard Development Permit Area that designates areas with high and moderate fire hazard ratings, non-wildland interface areas and areas where there is a natural firebreak. Most steep slopes fall outside of the high-risk zone that would trigger a wildlife hazard assessment under new development. In 2024, all of the development permit areas will be reviewed as part of the comprehensive OCP review process. This process could include an assessment as to whether additional wildfire guidelines should be applied to

steep slopes.

5. STEEP SLOPE DEVELOPMENT PERMIT GUIDELINES AND PROCESS

Overall, there were very few comments about the proposed technical development permit guidelines themselves. The strongest objection was that the proposed guidelines would continue to allow digging into the toe of steep slopes to maximize the developable footprint during new construction. The feeling was that even when that area is reinforced with an engineered retaining structure under geotechnical guidance, the structure cannot compensate for reduced slope integrity and surficial soils are far more likely to slide.

Additional concerns centered on the integrity of the professional reliance model, the concern that there are no geotechnical engineers on staff to review landslide assessments and the need for enforcement options to back up the development permit guidelines. Citing perceived unstable existing conditions and safety concerns, some felt it was appropriate to pause new development applications in steep slope areas until the proposed development permit amendments come into force.

Potential Solutions:

The proposed development permit guidelines contain detailed, specific requirements pertaining to the content of professional landslide assessments that reflect expectations from the Engineers and Geoscientists of BC professional practice guidelines. Although there is no intention on restricting removal of the slope toe, the proposed development permit guidelines require more detailed and comprehensive reports to address slope stabilization and other development activities. Under the professional reliance model, professionals can be asked to clarify report deficiencies and if necessary, concerns can be reported to the registrant's professional body for potential investigation.

Previously in the process, an option was presented to the City's Advisory Committees to support third party peer reviews of landslide assessment reports. That option was not endorsed by the committees, but Council could choose to revisit peer reviews and/or retaining second opinions.

7.0 NEXT STEPS

- Once received by Council in September 2023, this engagement summary will be posted to the City's Steep Slope project page at Get Involved Campbell River.
- If Council chooses to direct staff to proceed to a public hearing, the date would be advertised on the City website, newspaper and through social media. Additional public feedback would be received as part of that process and added to the written record.
- Third reading and adoption of the amendment bylaw would occur thereafter.
- If Council direct staffs to make changes to the amendment bylaw, it would require redoing first and second reading prior to scheduling a public hearing.
- Council could also choose not to proceed with the bylaw.

ATTACHMENT 1:

Summary of public feedback (paraphrased) arising from the steep slope mail out and the June 2023 Information Sessions

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Mapping 	Although their property is shown in the steep slope development permit area, they do not believe the mapping is correct.	Discussed technical aspects / difficulties involved with mapping steep slopes perfectly. If properties fall outside of the steep slope buffer area of the designation, the development permit guidelines would not apply.
<ul style="list-style-type: none"> Mapping 	Steep slope mapping may be inaccurate along Nebraska.	It is possible that previously constructed retaining walls incorrectly triggered the steep slope designation. If the properties are not within the 20m buffer of a defined steep slope (30% grade and >10m high) the development permit guidelines would not apply.
<ul style="list-style-type: none"> Hazard trees 	Resident is concerned that trees on the slope and on an adjacent property are hazardous and they want to be on record that this has been communicated to the neighbour.	A note was added to the property file.
<ul style="list-style-type: none"> Mail out 	Strata manager for a property at the base of the slope was concerned that not everyone in the building received a letter about the information sessions.	GIS system mapping does not capture all units in a building if they fall outside of the Development Permit Area. A number of stratas were flagged where this occurred and a separate mail out was completed to include all affected units within these buildings.
<ul style="list-style-type: none"> Soil stability 	Resident called to find out more information about the sessions noting the importance of trees anchoring the soil and following science. Caller expressed concern that the people at the	Discussion about EGBC landslide professional practice guidelines and the technical review completed to inform the proposed amendments to the guidelines and exemptions.

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	bottom of slopes are at greater risk than people at the top of the slope.	
<ul style="list-style-type: none"> Bald Eagle nest trees 	Resident reported on activity at a Bald Eagle nest tree at the top a steep slope.	The resident has an active eagle nest tree and observes/reports on nesting behaviour. The residents is aware that the Bald Eagle nest tree 60m Development Permit Area applies to the property as well as the Steep Slope Development Permit Area.
<ul style="list-style-type: none"> Mapping Permitting process 	Updated steep slope mapping now includes their property when it did not before. What will the process be to install a new path and repair a retaining wall?	If the property is not within the 20m buffer of the steep slope the development permit guidelines would not apply, regardless of the mapping. Before any new significant landscaping occurs, it was advised that property owners should always contact development services to discuss specifics and to determine what permits are applicable.
<ul style="list-style-type: none"> Fir Street slope 	Concern about slope stability near Fir Street and Rose Harbour in relation to infrastructure repairs and the water main.	The new water main on Fir was installed according to industry best practices to minimize the likelihood and consequence of any water main break. The City also placed strict requirements on the developer for backfilling and landscaping the slope after the installation of the new main for stabilization purposes. The sanitary main along Fir was recently reinforced via Cured-in-Place Pipe lining effectively renewing the pipe and helping to reduce the likelihood of a leak from the system that would destabilize the slope. After a leak exposed the water main on Dogwood, the Water Dept. is looking at how best to abandon the main to mitigate risk and in the interim, that section has been isolated to minimize the risk of failure.
<ul style="list-style-type: none"> Wildfire guidelines Stormwater management 	Are wildfire vegetation management guidelines and water management included in the amendment bylaw?	Stormwater management requirements are included in the proposed development permit guidelines and EGBC professional practice guidelines. Requirement to remove debris arising from vegetation management (where feasible) supports FireSmart principles.

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Development guidelines Stormwater management 	<p>All areas in the red must have guidelines of the potentially hazardous conditions, including water management. Concern that residents in the red zone are not following proper watering guidelines are injecting water into the bank – City should mandate residents to hook up their watering to storm drains instead of rock wells.</p>	<p>All areas in red on City maps (denoting the steep slope and the buffer portion of the development permit area) are subject to the development permit guidelines and exemptions. Staff are exploring funding options to address existing stormwater management issues. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p>
<ul style="list-style-type: none"> Strata Councils 	<p>Mail out should come to Strata Council as well as owners since all land bordering slope is common property.</p>	<p>Noted and this will be considered for any future mailouts.</p>
<ul style="list-style-type: none"> Slope stabilization with plantings 	<p>How do you best stabilize the steep slope and what is the best plant for root structure?</p>	<p>Native vegetation is always recommended. The most appropriate species of trees and shrubs depend on specific soil and moisture conditions. Pending funding, the City is exploring publishing planting guidelines that could help owners take care of their slopes.</p>
<ul style="list-style-type: none"> Recent landslide 	<p>How can the hill behind the condo blocks be stabilized and could the City look into getting the information instead of each individual member of Council?</p>	<p>Given this is privately owned land (no different than a front lawn or a driveway), the City has limited ability to engage on any in-depth geotechnical assessments or stabilization work. City Operations follows best practices regarding the management of at-risk infrastructure. As such, Operations completed an exhaustive inspection and testing of City infrastructure in the area of the mudslide earlier this year, which determined that no City assets had been impacted nor had contributed in any way to the slide.</p>
<ul style="list-style-type: none"> Existing development permits 	<p>What about development permits already issued in a steep slope zone? Will the City provide a surveyor to come to</p>	<p>Existing and in process development permits would not be retroactively subject to new guidelines. The City does not have the resources to survey individual private properties.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Steep Slope Verification 	private properties to confirm or deny conformity to the steep slope designation?	
<ul style="list-style-type: none"> Stormwater management Disturbing the slope toe 	What about storm sewers at the top of the hill to deal with ground water issues? Why is there nothing about the responsibilities of the developers? Development should not be permitted to dig at the bottom of the bank under the technical guidelines even with geotechnical sign-off - this causes sloughing.	Staff are exploring funding options to address existing stormwater management issues and options. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes. The proposed development permit guidelines draw from EGBC technical professional practise landslide assessment guidelines. Under the professional reliance model, concerns about professional practise can be reported to the governing body (EGBC).
<ul style="list-style-type: none"> Existing development permits Wildlife tree modifications 	How are current/active development permits or variance requests being handled before the amendments are completed? Public safety concerns exist; work should be paused until the amendments are completed. Add promotion of wildlife tree/habitat modification to the exemption form for vegetation management.	Current/active DPs are proceeding according to the existing development permit criteria; however, the professionals would still need to apply the EGBC professional practice landslide guidelines. Wildlife tree modifications proposed in the exemptions can be added to the exemption form.
<ul style="list-style-type: none"> Enforcement 	Municipal bylaw fines could be considered the "cost of business" and ignore regulations; how can enforcement be given teeth?	The provincial <i>Community Charter Bylaw Enforcement Ticket Regulation</i> sets the maximum fine amount at \$1,000. Sometimes more powerful than ticketing, are the powers to immediately suspend development and mitigate damages under the "Enforcement, Cost Recovery and Penalties" section of a regulatory bylaw. These provisions will be included in the Environmental Protection Bylaw.
<ul style="list-style-type: none"> Restrictive covenants 	How does a restrictive covenant for tree topping work? Would it follow the same terms of hiring an arborist and a permit to top trees? How long	Any vegetation works completed in relation to a restrictive covenant would also have to go through the DP exemption process and this would also apply to trimming blackberries on the slope. An exemption form for vegetation

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Vegetation maintenance Stormwater Management 	would this process take? If I wanted to trim a blackberry bush, what is the process and timeline for approval? For the vegetation management exemption form, a storm sewer has to be installed at the lower base of the bank to manage water.	management is currently in use and most requests are process by development services in a few days.
<ul style="list-style-type: none"> Stormwater management 	Vegetation management exemption form is a cost saving measure and does not deal with the real problem of water management. The City should add a storm drain beside the storm sewer at the bottom of the bank.	Staff are exploring funding options to address existing stormwater management issues and options.
<ul style="list-style-type: none"> Beech Street slope Blackberry management 	Does the City have any steep slope protection plan for the Beech Street parking lot/slope? What is the process for blackberry removal and re-planting?	<p>The City reviewed the Beech Street slope as part of a previously proposed nearby development. With the cancellation of that development, the City will look at revising the review to include maintenance in its current state. Specific actions will be determined during the revision, in general however, the best approach to maintaining slope stability is to minimize disruption to existing vegetation and soil, which the City is committed to continue doing for this slope.</p> <p>Blackberry removal and replanting native vegetation on a steep slope is permitted in the exemption criteria under the direction of a Qualified Environmental Professional with an exemption form filled out.</p>
<ul style="list-style-type: none"> Stormwater management 	When will the City stop water from coming down into 738 South Island Highway? (Remainder of the comments were not legible)	Operations completed an exhaustive inspection and testing of City infrastructure in the area of the mudslide earlier this year, which determined that no City assets had been impacted nor had contributed in any way to the slide. Since the water coming down the bank is occurring on private land not related to City

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		infrastructure, the City is not planning on any further works to address the water flow.
<ul style="list-style-type: none"> Stormwater management Bureaucratic process Vegetation maintenance Amendment timing 	<p>Has City considered water run off with regards to bank stability? Can homes tie storm run-off to sewer lines that run along the bank or add storm drains? Do City departments work together on sewer and storm drain projects? Seems like that instead of installing storm drains, the City is transferring the problem to homeowners. The process is too bureaucratic and creates too many barriers and costs. By being able to prune alders and maples you keep banks safer because they aren't getting too big, where they'll topple in a southeast or north wind and take the bank with it. By regular pruning there is less leaves on a bank and better for maintenance and bank safety. Oct/Fall 2023 is too soon to decide.</p>	<p>City Operations follows best practices regarding the management of at-risk infrastructure. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes. The existing exemption criteria already require certified arborist sign off and a version of the exemption form is currently in use. Most exemption forms are being processed within a few days and the certified arborists reported that it takes about 10 minutes for them to fill out the form.</p>
<ul style="list-style-type: none"> Stormwater management 	<p>Concerns about ground/storm water – there is not much information.</p>	<p>The proposed bylaw amendment is about new development going forward and updating the regulations that need to be followed.</p>
<ul style="list-style-type: none"> Stormwater management 	<p>What is being considered in relation to storm drain run off on the steep bank? Why wouldn't those issues be dealt with before bringing in these trimming changes?</p>	<p>The proposed development permit amendments are comprehensive covering all aspects of site development well beyond tree trimming. Staff have been working to amend regulations to address new development for a number of years in order</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		<p>to correct errors and bring the language into alignment with professional practice guidelines for landslide assessments.</p> <p>Concurrently, City Operations is following best practices regarding the management of at-risk infrastructure. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p>
<ul style="list-style-type: none"> Recent landslide Stormwater management 	<p>Too little, too late. What do you plan on doing regarding the current situation? Do you not have a responsibility to put in a pipe behind 758 South Island Highway? A stream does not grow to a river without drainage being ignored, what have you done to bring all parties together to facilitate fixing the problem? Who signed the original building permit for this development on Ash and below the slope on South Island Highway? How can the people at the bottom of the slope deal with the fallout of the slide when they don't own the property that caused the slide? What water is additionally coming down that slope, the stream grew. Why? Put in a pipe.</p>	<p>The City has limited ability to engage on any in-depth geotechnical assessments or stabilization work on privately owned land. City Operations follows best practices for the management of at-risk infrastructure and an exhaustive inspection and testing of City infrastructure was conducted in the area of the mudslide earlier this year. No City assets contributed to the slide nor were they impacted in any way.</p> <p>Previous building permits and development permits were signed off according to rules and standards and the permitting structure in place at the time. Permits are limited to the impact of the proposed development on the installed capacity of City infrastructure, not the performance of individual private systems.</p>
<ul style="list-style-type: none"> Recent landslide 	<p>This is all good for future works but what is being done that will aid the people of slide of last January? Future drainage works upgrades are a little late for us. This has been a known issue for some time. When I called the City to</p>	<p>Drainage systems must be operated under industry standards and regularly maintained to avoid performance/capacity issues. If the drainage system at the slide location wasn't operating as per its designed capacity, it is the responsibility of the property owner to address the issues within their property.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	look at this several years ago, I was sent out an employee not an Engineer. Why? He looked at the situation, shrugged his shoulders and I never heard from anyone after. Who signed off on the original building permit for Hillside Place at 738 South Island highway? The water was exiting the bank back in 1992 as drainage piping was installed to get this water to the drainage ditch at South Island Highway. This pipe was installed by the developer. There didn't seem to be any concerns at the time. Why not?	Previous building permits and development permits were signed off according to rules and standards and the permitting structure in place at the time. Permits are limited to the impact of the proposed development on the installed capacity of City infrastructure, not the performance of individual private systems.
<ul style="list-style-type: none"> Information accessibility Recent landslide QEP lists Slope vegetation Stormwater management 	Clear and precise information where to locate steep slope hazard develop permit amendments on the City website (or elsewhere) would be helpful. List required professionals such as engineers, geotechs and arborists as most people have no idea who or how to contact the necessary people required. Suggest that the City should help with the planting of correct vegetation on slopes. Lack of City staff presence and help when the recent slide happened. No stormwater management on Ash street, water from Ash St flows down the steep slope onto property. City continues to issue building permits without enforcing water management.	<p>All project information can be found at: https://getinvolved.campbellriver.ca/steepslopes</p> <p>The City has a list of local Qualified Professionals available on request through Development Services that is periodically updated.</p> <p>Operational staff have started to assemble a vegetation list and best management practices that could be used as a resource for those wishing to remediate slopes. Should grant funding become available, these materials could be formalized and published as a resource for the community. However, there isn't the capacity or resources for City staff to assist with planting on private property.</p> <p>An exhaustive inspection and testing of City infrastructure was conducted in the area of the mudslide earlier this year.</p> <p>Staff are exploring funding options to address existing stormwater management issues and options.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Approval process Vegetation management 	<p>Will the properties below the steep slope be informed of an approved exemption to cut/trim/remove trees, especially important to know if work is done on a long weekend and if it's approved? Is there a "second check" to an arborist recommend to trim/cut/remove trees? Can a clean-up of debris be part of the work reimbursement?</p>	<p>The City is not in the position to inform adjacent residents when exemptions are approved for a specific property. The City's certified arborist acts as a "second set of eyes" and is currently consulted by Development Services to review exemption requests under the existing development permit process and this would continue if the exemption criteria are amended. The proposed vegetation management exemption criteria includes the requirement to remove large branches wherever it is safe to do so.</p>
<ul style="list-style-type: none"> Vegetation management Stormwater management 	<p>The mature trees on the City owned Spruce Street hill are dying off with their root structure exposed. What is the City doing to protect this property from sliding? Improve the drainage along Spruce Street behind our property.</p>	<p>Operations has removed a number of dead and dying trees along the Spruce Street hill that could be considered a hazard. For any further issues of concern, whether related to trees, drainage or slope stability on City-owned land the best approach is to contact Dogwood Operations Centre at 250-286-4033 dogwood.centre@campbellriver.ca</p>
<ul style="list-style-type: none"> Recent landslide 	<p>Update on slide</p>	<p>City Operations follows best practices regarding the management of at-risk infrastructure. As such, Operations completed an exhaustive inspection and testing of City infrastructure in the area of the mudslide earlier this year, which determined that no City assets had been impacted nor had contributed in any way to the slide. After completing and publishing the geotechnical report for the event and conducting an on-site structural inspection of the affected building in order for it to be re-occupied by the residents, the City completed its scope of work related to this event.</p>
<ul style="list-style-type: none"> Permits 	<p>Difference between variance and permits?</p>	<p>A development permit under the Hazard Conditions (Steep Slope) Development Permit Guidelines is required when new works are proposed on a steep slope or within the 20m buffer areas from the crest or the toe of the slope. This permit process requires a professional landslide assessment that meets the standards in</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		<p>the Engineers and Geoscientists BC professional practise guidelines for addressing the scope, level of effort, hazard analysis and reporting requirements. The report evaluates the proposed development and site-specific conditions to determine risk, prescribe mitigation measures, make recommendations and prescribe setbacks. The landslide professional is also required to include a completed “Landslide Assessment Assurance Statement”.</p> <p>There is no such thing as a “variance” permit for steep slopes. Some attendees at the information sessions were referring to a development permit for steep slopes as a “variance” because the permit allows work to occur in the steep slope development permit area under the evaluation of landslide professional’s assessment.</p>
<ul style="list-style-type: none"> Sanitary sewer 	Is the sewer system overflowing?	Operations completed an exhaustive inspection and testing of City infrastructure in the area of the mudslide earlier this year, which determined that no City assets had been impacted nor had contributed in any way to the slide. The sewer system is not overflowing.
<ul style="list-style-type: none"> Blackberry management 	If blackberries are not a good choice as they grow massive, how should they be removed? And replaced with what?	Operational staff have started to assemble a vegetation list and best management practices that could be used as a resource for those wishing to remediate slopes. Specific removal techniques and replacement vegetation depend on the individual site-specifics as well as the timing and scope of removals. Should grant funding become available, these materials could be formalized and published as a resource for the community. Planting native trees and other native vegetation is an exempt activity on steep slopes in accordance with written advice of a Qualified Environmental Professional that provides recommendations for follow up monitoring until establishment.

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Stormwater management 	What considerations are being made for storm run-off? Why wouldn't that be considered before creating this plan?	Staff are exploring funding options to address existing stormwater management issues and options. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes. Addressing existing conditions is a process that is separate from setting conditions for new development and these two separate processes are happening concurrently.
<ul style="list-style-type: none"> Disturbing the slope toe 	Addressing developer encroachment at bottom of slope	The existing and the proposed amendments allow development within the 20m buffer area and infringement into the toe of steep slopes. However, the proposed amendments to the development guidelines are far more prescriptive and require a more detailed analysis of geohazards including drainage that could affect the proposed development, regardless of whether the geohazard originates on or beyond the development property boundaries.
<ul style="list-style-type: none"> Bureaucratic exemption process 	Getting a certified arborist for an exemption and then City permission is too involved with time, cost and creates barriers. How can this be less bureaucratic?	The existing exemption criteria already requires certified arborist sign off and a version of the exemption form is currently in use. Most exemption forms are being processed within a few days and the certified arborists reported that it takes about 10 minutes for them to fill out the form.
<ul style="list-style-type: none"> Amendment timing 	Fall 2023 is too soon, can you extend this deadline?	The June 2023 information sessions are part of the third round of public and stakeholder engagement sessions that began in 2021. There are no plans to extend the engagement timeline.
<ul style="list-style-type: none"> City assistance 	Could a property owner ask a City professional (e.g. Arborist, Geotech, Engineer) for an opinion on their hazardous slope?	The City does not have a professional on staff qualified to conduct landslide assessments and provide opinions on slope stability. For vegetation maintenance on steep slopes, property owners are required to retain a certified arborist to sign

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		off on the works through an exemption form. Development Services would then request review by the City arboriculture technician.
<ul style="list-style-type: none"> Terms of reference 	What was the term of reference for the consultant?	The scope of work for the Hazard Conditions (Steep Slope) DPA included: a detailed review of the existing steep slope guidelines and exemptions and other relevant DPAs in the OCP; review of similar DPAs from other municipalities; review of the existing steep slope mapping and recommend improvements to the steep slope guidelines and exemptions based on the review and in line with professional practice guidelines for landslide assessments.
<ul style="list-style-type: none"> Enforcement 	How is bylaw enforcement (fines) proportional to developer budget? If “fines” = cost of business, law is not enforced.	The Official Community Plan Development Permit Guidelines are not enforceable through ticketing. However, offences can be set under a separate regulatory bylaw that established fines and a remediation framework. Staff have drafted an amendment to the Environmental Protection Bylaw. With respect to the amount of a fine, the provincial <i>Community Charter Bylaw Enforcement Ticket Regulation</i> sets the maximum fine amount at \$1,000.
<ul style="list-style-type: none"> Legal access 	Although we have a friendly relationship with our Ash Street neighbours, we have no legal access to view our top of slope and buffer zone and are worried about how to check it if one of our neighbours refuse access. Could the City help?	When the lands are privately owned, it is up to private property owners to discuss solutions with each other.
<ul style="list-style-type: none"> Stormwater management 	What is the process in place to review stormwater systems and plan for review and updating?	Staff are exploring funding options to address existing stormwater management issues and options. City Operations is also pursuing Council’s directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Engineering and Fire Department comments 	Are the comments from engineering and fire department available?	To access this information, please submit a Freedom of Information (FOI) available at: https://www.campbellriver.ca/your-city-hall/freedom-of-information .
<ul style="list-style-type: none"> Planting new trees 	What's the logic in getting permission to plant new trees?	Since steep slopes are hazard lands, it is prudent to have a qualified professional provide guidance on new plantings through the exemption process that defines the scope and adheres to best management practices.
<ul style="list-style-type: none"> Current development 	Current development proposals in steep slope areas should be paused while regulations are being updated to protect public safety.	Current/active development permits are proceeding according to the existing Development Permit criteria; however, the professionals would still need to apply the EGBC professional practice landslide guidelines.
<ul style="list-style-type: none"> Stormwater management Debris removal Fix bank 	Why is the ground water not dealt with, it's the root cause of all slides. Removal of pruned limbs and trees would require a helicopter. These banks have been here forever, they are ironically new lots and have been paid. So instead of wasting money on studies, it should be used to help fix it.	<p>A geotechnical review of a slide in Campbell River concluded that landslides are typically caused by a combination of factors, some of which can exist for years without causing slope failure but then the landslide is triggered by a change in conditions, often weather-related. The typical contributing factors are the terrain, loss of trees and vegetation, fill placement including compost, concentrated drainage and removal of toe support.</p> <p>The City is continuously looking at how to improve its delivery of drainage services around steep slopes. This includes aspects such as drainage installation oversight, maintenance programs and capital replacement projects. This process is occurring concurrently with the proposed development permit amendments.</p>
<ul style="list-style-type: none"> Taxes 	Is there going to be a reduction of taxes due to this problem?	The proposed steep slope regulatory changes will not impact service delivery so there will not be a direct tax decrease. However, since the amendments aim reduce landslide risk, minimizing these events will provide a cost savings to taxpayers as these can pose a risk to the City and its infrastructure, which can be

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		costly to repair. Encouraging the maintenance of trees and vegetation promotes better drainage and has positive climate impacts. This natural asset management also promotes cost savings as these methods are often less expensive than engineered solutions and can decrease not only capital costs, but operations and maintenance costs as well which would have a positive impact on taxation.
<ul style="list-style-type: none"> • Buffer zone • Professional reliance and report quality • Vegetation maintenance • Slope stabilization 	<p>How did you come up with the 20m buffer? This appears grossly deficient for any landslide runout. What are you doing to improve geotechnical assessments? EGBC requires professionals conducting this work to review upslope hazards; they aren't always. Do you have staff qualified to review geotechnical reports and accept them? This is important. Why would you allow exemptions? Why are you focused on vegetation when more focus is needed to protect downslope residents from the actions of those above (i.e.; retention walls, slope stabilization infrastructure) as per the recent reports produced after the events of Feb 2023. These recommendations for further assessments appear to be not addressed.</p>	<p>The 20m buffer at the crest and toe of steep slopes is part of the designated development permit area that exists now. This buffer distance is not the same thing as a prescribed setback from the crest or the toe of the slope that is determined through a landslide assessment. The proposed amendments to the development guidelines are far more prescriptive and require a more detailed analysis of geohazards including drainage that could affect the proposed development, regardless of whether the geohazard originates on or beyond the development property boundaries. Although we do not have landslide assessment professionals on staff, having very specific development permit guidelines drawing from EGBC's professional practice guidelines allows staff to reject reports that don't include the required information. The exemption criteria allow for low-risk (determined through technical review) activities to still occur.</p> <p>Operations completed an exhaustive inspection and testing of City infrastructure in the area of the mudslide earlier this year, which determined that no City assets had been impacted nor had contributed in any way to the slide. After completing and publishing the geotechnical report for the event and conducting an on-site structural inspection of the affected building in order for it to be re-occupied by the residents, the City completed its scope of work related to this event. Any further report recommendations concerning slope stabilization would be the responsibility of the private property owners.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Community engagement 	Really shocked given input from 2022 Council meeting that the bylaw is proceeding as proposed. How can we find a reasonable approach to these issues? I find community input severely lacking in this process. The comments raised at the April meeting in 2022 have not been addressed. Thought there was to be a workshop with dialogue not a static session with a predetermined outcome.	The exemption criteria permitting vegetation management were broadened in consultation with technical advisors after the initial public engagement in 2021. Staff cannot recommend further broadening of the vegetation removal criteria from a technical perspective. The purpose of the information sessions as directed by Council were to clarify, explain and inform.
<ul style="list-style-type: none"> Topping trees 	Concern of topping a tree (not kill the tree) in my sea view that hasn't been topped before. For the vegetation management exemption form, allow topping trees as long as arborist agrees this will not kill the tree.	Many trees, especially large conifers, do not respond well to topping and become weakened. This matters when we are relying on large trees to help manage water and stabilize soils on steep slopes. Tree topping is not a recommended practise in the tree care industry.
<ul style="list-style-type: none"> Pool placements Tree management Stormwater management 	Placement of a pool in the upper buffer zone? Arborist checking trees (large) in close proximity to residence. Waterfall flow being buried on an adjacent property (Spring Road). For vegetation management exemption form, review of dead tree removal.	Pool placement in the 20m buffer zone at the crest of a steep slope is not an exempt activity and would trigger the development permit process. Trees can pose many types of hazards to human safety and property. Hazard tree removal is an exempt activity not requiring a development permit under most circumstances and details have been included on the exemption form.
<ul style="list-style-type: none"> Wildfire guidelines 	How is fire-smarting on steep slopes being addressed? A fire would reduce slope stability considerably. Does the City have plans to reduce fuel loading on steep slopes within the City?	Requirement to remove debris from vegetation management (where feasible) supports FireSmart principles.

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	Have concerns with the area adjacent to Spruce Street.	Operations has removed a number of dead and dying trees along the Spruce Street hill that could be considered a hazard. For any further issues of concern, whether related to trees, drainage or slope stability on City-owned land the best approach is to contact Dogwood Operations Centre at 250-286-4033 dogwood.centre@campbellriver.ca .
<ul style="list-style-type: none"> Stormwater management 	Vegetation and water are the two issues. Seems like you are focusing on vegetation when water would be easier. First step, when will the City deal with water that goes over the slope?	<p>For new developments that trigger the steep slope permit process, all aspects of drainage need to be addressed in the landslide assessment report.</p> <p>For existing drainage issues, the City is continuously looking at how to improve its delivery of drainage services around steep slopes. This includes aspects such as drainage installation oversight, maintenance programs and capital replacement projects. Staff are exploring funding options to address existing stormwater management issues and options. City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p>
<ul style="list-style-type: none"> Information follow up 	Will you provide the specific information to those living in the area? I appreciate the new information and look forward to more specific guidance	<p>As new project information becomes available it will be posted to the City's steep slopes project information page at:</p> <p>https://getinvolved.campbellriver.ca/steepslopes.</p>
<ul style="list-style-type: none"> Buffer zones Slope stabilization 	I live along Island Highway South and I see there will be a 20-metre buffer zone to new builds. Our building has no buffer zone, what do you suggest we do? Are retaining walls appropriate for our very steep slope?	The 20m buffer at the crest and toe of steep slopes is part of the designated development permit area that exists now and that is being carried over to the improved guidelines. Whenever a new development is proposed within the 20m buffer areas, it triggers the permit process and a professional landslide assessment to determine the setback and any mitigations measures required. As such, the 20m buffer is not the same thing as a prescribed setback. If a property

TOPICS	SPECIFICS	ANSWERS/COMMENTS
		owner has a concern about bank stability it is advised that they contact a qualified professional for expert advice
<ul style="list-style-type: none"> Slope stabilization Vegetation management 	Has the City considered retaining walls in critical areas to prevent a landslide from affecting properties below? For vegetation management exemption form, tree removal and allowing waste on steep slope can be dangerous. Is there consideration to have the property owner below consulted?	<p>The City has limited ability to engage on any in-depth geotechnical assessments or stabilization work on privately owned land. If a property owner has a concern about bank stability it is advised that they contact a qualified professional for expert advice.</p> <p>The City is not in the position to inform adjacent residents when exemptions are approved for a specific property.</p>
<ul style="list-style-type: none"> Exemptions Public safety 	Exemptions are generous and probably strike a good political balance. City should definitely be primarily focussed on public safety first and above all else. Exemption 3g – who will have a final say on this item?	Exemption 3 g) speaks to tree modification to support nesting opportunities for Bald Eagles. Requests would have to be evaluated based on the individual assessments and site conditions. The City would have the final say.
<ul style="list-style-type: none"> Exemptions 	If a person receives an exemption to top large maples, can that exemption be extended to subsequent years, so long as the guidelines of the certified arborist is followed?	Any new vegetation management request would need to adhere to the new exemption criteria.
<ul style="list-style-type: none"> Stormwater management 	You need to put more thought into drainage issues in existing areas like Ash and Galerno, north end.	There are a number of initiatives being explored/developed concurrently to address existing drainage issues. City Operations is pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Yard waste dumping Vegetation removal Stormwater management 	<p>Alder street between 5 and 6 residential dwellings on the east side developing yard waste and water runoff – no storm sewers? Homeowners removing trees at the top of the slope: 1. Removal of trees 2. Storm water 3. Yard waste. All potentially impacting the slope on Thulin.</p>	<p>The proposed amendments would regulate tree removal under both the guidelines and the exemption criteria as well as regulate yard waste dumping on steep slopes to reduce landslide risk.</p>
<ul style="list-style-type: none"> Wildfire Vegetation maintenance 	<p>Fire safety, clearance around home, different rules for maples.</p>	<p>Requirement to remove debris from vegetation management (where feasible) supports FireSmart principles. Certified arborists evaluating trees would take into consideration tree species as well as site-specific conditions in their evaluations.</p>
<ul style="list-style-type: none"> Irrigation 	<p>Any mention of irrigation systems above slopes? Limit on how close or not at all?</p>	<p>New developments triggering the development permit process would have to consider irrigation in the technical assessment process. For existing developments, irrigation installation is not covered.</p>
<ul style="list-style-type: none"> Liability 	<p>I live in a strata bordering 3 steep slopes. It says slope maintenance and remediation costs in case of failure would be shared by the City & Owners. How is the Owners liability assessed assuming that failure was a force majeure and not negligence?</p>	<p>The information presented stated that hazard slope management is a shared responsibility between property owners and the City. This means that property owners can assist reducing landslide risk by adhering to science-based guidelines and exemptions for steep slopes on their private property. Similarly, the City is continuously looking at how to improve its delivery of drainage services around steep slopes. This includes aspects such as drainage installation oversight, maintenance programs and capital replacement projects.</p>
<ul style="list-style-type: none"> Exemptions 	<p>1. In the Buffer Zone: 4(c) of the proposed amendments says that a tree 15 cm or less at 1m can be cut. What do we do when that tree is</p>	<p>1. If the tree in the buffer zone is >15cm diameter (measured at 1.3m from the base) please check with development services. The City's goal is to allow yard maintenance to occur without unnecessarily triggering the DP process. For</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Vegetation management 	<p>17 cm at 1m? Does this trigger a Development Permit or Exemption Form?</p> <p>2. On the guide to the Exemption Form: what is meant by debris not being able to be removed “safely”? Is this referring to safety for the slope stability or to the personnel removing the debris? Or both?</p> <p>3. City approval of a QEP: what criteria, other than is required by the regulatory body of a QEP would the City be looking for in “approving” a QEP?</p>	<p>instance, depending on distance of the tree from the slope crest and the tree species, it could be possible to remove the tree without triggering the permit process. The City is not proposing that an exemption form be filled out for works meeting the exemption criteria in the buffer zones.</p> <p>2. The safety reference refers to the people working on the slope.</p> <p>3. The City’s approval means that staff are review a QEP’s recommendations to determine if they are consistent with the City’s regulations and professional practice guidelines.</p>
<ul style="list-style-type: none"> Buffer zones Public input 	<p>I think a 20 m buffer zone at the top, and the bottom of the steep slope is quite excessive. 20 feet seems more reasonable - 5 sheets of plywood 4’ x 8’ laid side-by-side is 20 feet. What possible reasons for 3x that width is necessary? It could be that the necessary buffer zone required either at the top, or the bottom, or both of the steep slope might be a function of the individual property being discussed. As I remember from the July City Hall meeting 2022, someone suggested that parts of these new amendments should be written into each individual properties’ description. More time needed for discussion and getting community</p>	<p>You are correct that the setback from the crest or the toe of a steep slope is a function of the individual property’s existing conditions as well as the nature of a proposed development or activity. For new development in the development permit area (includes the buffer zone), the landslide professional determines the actual setback from the crest of toe through technical analysis. The landslide professional also completes a “landslide assessment assurance statement” as set in the EGBC professional practise guidelines.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	input or individual property owner input the proposal	
<ul style="list-style-type: none"> Education Vegetation management 	<p>I have lived here for 50+ years and family or friends have managed to keep deciduous trees trimmed enough to try to preserve a view of the harbour. (City trees on island highway are now blocking some of the view). My understanding is that this maintenance routine can be continued. I need to use the help when family is in town. Permitting rules can sometimes make this difficult. For vegetation management exemption form: I believe a lot more education about erosion, fire and drainage issues would be more helpful than threatening bylaws. When people understand the reasoning behind these issues there would be less tension. Hire consultants rather than more bylaw officers.</p>	<p>The proposed hazard slope development permit area exemptions continue to allow some tree maintenance on steep slopes to allow for views. Prior to any routine maintenance, residents are required to work with their certified arborist to ensure that the works meets the exemption criteria for vegetation management</p> <p>Staff are exploring funding options to assist with steep slope educational information on steep slopes. This could include erosion, drainage, yard waste and planting information.</p>
<ul style="list-style-type: none"> Stormwater management Bureaucratic exemptions Vegetation management Public workshop 	<p>Why is the issue of water run off not being addressed in these bylaw changes? It is a significant (and likely greatest cause) of slope instability. The focus on very prescriptive exemptions is not going to address the issue of slope instability. Proposed process is unduly complicated, bureaucratic and potentially costly to citizens. Bylaw is very arbitrary - e.g. any land alteration “can” require a Development Permit and “may” trigger a landslide assessment</p>	<p>For new developments, all aspects of stormwater management and water run off are included in the development permit guidelines and landslide professionals are also required to evaluate drainage according to the EGBC professional practice guidelines</p> <p>For existing drainage issues, which are not covered under the development permit guidelines, staff are exploring funding options. City Operations is also pursuing Council’s directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
<ul style="list-style-type: none"> Processing times 	<p>professional. Why are there such prescriptive criteria to deal with trees? Why cannot a certified arborist determine if removing, pruning is appropriate. I worry that slope property owners will focus on removing and pruning immature trees that fall within the exemptions. Would it not be better to support trees to mature but have a reasonable way for citizens who own slope property to maintain their views? Why was there not a workshop as discussed at the summer 2022 Council Meeting? I was left believing there would be a workshop with meaningful two-way dialogue not an information session of what has already been decided. Why is the onus on the individual property owner of the slope as the biggest issue is water runoff of which the City has a major responsibility? Who will review the exemptions and what is the criteria that will be used to determine if they are accepted? In reviewing the current documentation, it seems arbitrary. What is the timeframe that the City will be able to response to exemption requests? Why do the Certified Arborists have to be approved by the City? If they hold the appropriate qualifications they should be able to be used. The approach outlined seems like an unfair business practice limiting competition. For vegetation</p>	<p>steep slopes. Addressing existing conditions is a process that is separate from setting conditions for new development and these two separate processes can be concurrent.</p> <p>For the exemptions criteria, it is the City's goal to allow as much flexibility as possible to landowners while still adhering to professional practice guidelines to reduce the risk of landslide. The exemptions allow for landowners to grow trees to maturity and prune for views.</p> <p>The purpose of the information sessions as directed by Council were to clarify, explain and inform the proposed amendments.</p> <p>The existing exemption criteria already requires certified arborist sign off and a version of the exemption form is currently in use. Most exemption forms are being processed within a few days and the certified arborists reported that it takes about 10 minutes for them to fill out the form. Development Services reviews the exemption forms to see if they conform with the exemption criteria and in consultation with the City Arborist as required.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	management form, if not so prescriptive it would not be so complicated.	
<ul style="list-style-type: none"> Public workshop Neighbourhood cooperation Vegetation management Tree/View covenants 	<p>I was looking forward to a workshop where feedback was going both ways based on information previously delivered to Council - there wasn't any where that I could see that some of our information could be passed to you in this process. I spoke to you briefly about my personal situation with my neighbor, which is an excellent relationship with many years of previously topping an old hedge that has gotten out of control, but we both like it for the privacy. Also, my home is one of the ones we've discussed that have tree height covenants on the properties below me. I am hoping that being a practical guy that a group could be formed amongst the residence of the steep slopes that we could work together as a group as a neighbourhood to improve our personal bank situation. As we know they're all different. And then in some form or fashion, police ourselves for the safety of the bank, community and homes. I'm not sure exactly how that would look but it's something but I've been talking to a few people about painting every property with the same brush is my problem. My personal tree covenants are left four times higher to</p>	<p>The purpose of the information sessions as directed by Council were to clarify, explain and inform. The exemption criteria permitting vegetation management were broadened in consultation with technical advisors after the initial public engagement in 2021. Staff cannot recommend further broadening of the vegetation removal criteria from a technical perspective.</p> <p>With respect to existing drainage issues, which are not covered under the development permit guidelines, City Operations is also pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p> <p>Addressing existing conditions is a process that is separate from setting conditions for new development and these two separate processes are proceeding concurrently.</p> <p>It is encouraged that property owners work with each other wherever possible to address steep slope management and to be aware of the regulations and exemptions in place. Where property owners have covenants that require tree maintenance, it is strongly encouraged that owners revisit those covenants to ensure that they don't require activities that contribute to landslide risk; it may be appropriate to consult with a landslide assessment professional.</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	maintain our privacy and that's one of our neighbourly concessions about our trees.	
<ul style="list-style-type: none"> Stormwater management Vegetation management City Engineering Viewscales Access to internal review comments High risk areas Cost of amendments Public workshop 	<p>1. If the proposed regulatory amendments are being packaged as a safety initiative why is it all about tree retention and not addressing real safety concerns such as storm water management and wildfire interface? 2. Why are the proposed changes being crafted by the city's environmental dept and not the engineering dept? 3. Why aren't view corridor being valued as outlined in the city's OCP and every multifamily development permit application that posed the slightest threat to taxpayer's views? 4. Why wasn't there a meaningful round table workshop conducted as requested by previous city council at the last public meeting that capitalized on impacted property owners lived experiences? 5. Was the proposal circulated to city fire dept and city engineering dept for comments? And if so can those comments be made public? 6. Is there a proposed budget for the additional cost of the proposed changes?</p> <p>For vegetation management form, put the effort into identifying the actual high-risk areas and work directly with impacted land owners in mitigating the risk instead of a blanket policy</p>	<p>For new development in the steep slope DP area, the proposed amendments to the development guidelines are far more prescriptive and require a detailed analysis of geohazards including drainage that could affect the proposed development, regardless of whether the geohazard originates on or beyond the development property boundaries. There are other concurrent City processes in motion to address existing stormwater management concerns. The requirement to remove debris from vegetation management activities where possible is consistent with wildfire management.</p> <p>OCP amendment bylaws are under the purview of the Long Range Planning and Sustainability Department. The amendment bylaw has been circulated to other departments including the engineering function of capital works, liquid waste services and development engineering.</p> <p>The proposed amendments for steep slopes are meant to align with professional practice guidelines for landslide assessments focusing on human safety. With human safety prioritized, the exemption criteria do allow for some maintenance for viewscales.</p> <p>Council made no resolutions at the public hearing concerning a workshop. In April 2023, Council directed staff to host the information sessions which were the sessions held in June 2023.</p> <p>To access internal departmental review comments, please submit a Freedom of Information (FOI) available at: https://www.campbellriver.ca/your-city-hall/freedom-of-information</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	that negatively impacts properties that don't pose a high risk.	There is no additional cost to staff processing of steep slope development permits and exemption forms resulting from the proposed amendments.
<ul style="list-style-type: none"> Vegetation management Exemptions Public workshop Permit/Exemption process and timelines Viewscape Stormwater management 	<p>If a homeowner wants to prune a conifer bigger than 2 inches will a DP be required? If a homeowner wants to prune or top a maple bigger than 8 inches will a DP be required? If debris can't be removed from the slope will a DP be required? In order to remove a hazardous tree would a DP be required? If we want to plant trees to strengthen the steep slope will a DP be required? How long does it take to get a DP? Will more City staff have to be hired to deal with this bylaw? Was the information session at the community hall the "workshop" that was promised at the 2nd reading? City staff has to get more realistic regarding 1500(?) properties wanting to maintain views. Having to get a DP is complete overkill. We all want safe steep slopes but water management is the problem not occasional pruning and tree topping.</p>	<p>A development permit would not be required to prune a conifer with a diameter >2 inches. An exemption form would be required with sign off from a Certified Arborist stating that the activity would not kill the tree and that ANSI A300 pruning standards are being utilized. A similar exemption process would be in place for pruning a maple with a diameter >8 inches. A development permit would not be required if debris cannot safely be removed from the slope.</p> <p>Planting native trees and vegetation on a steep slope is permitted in the exemption criteria under the direction of a Qualified Environmental Professional with an exemption form filled out. Most exemption forms are being processed in a few days.</p> <p>The proposed amendment bylaw including the exemption form process reduces staff processing time. The exemption form and process is meant to assist landowners with routine hazard and vegetation maintenance activities without triggering a costly and time consuming Development Permit process.</p> <p>Council made no resolutions at the public hearing concerning a workshop. In April, Council directed staff to host the information workshops.</p>
<ul style="list-style-type: none"> Exemption fees Stormwater management 	<p>Fees? For trimming trees that have been trimmed for 30-40 years with no problems. There should be no fees. Just another form of taxation. I think this is more of a water run off problem than tree and bush problem.</p>	<p>If the proposed vegetation maintenance falls within the steep slope exemption criteria, there is no fee. There are a number of initiatives being explored/developed to address existing drainage issues that occurring concurrently but unrelated the steep slope development permit area amendment process. City Operations is pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk</p>

TOPICS	SPECIFICS	ANSWERS/COMMENTS
	The lots where our home is are from the 50's and there are no storm drains. For the vegetation management exemption form, I will leave that to the experts and not the ones at city hall.	assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.
<ul style="list-style-type: none"> • Viewscapes • Responsibility of owners at slope toe and the City • Vegetation management • Stormwater management 	We want to preserve our view and are concerned about the integrity of our slope and native habitat. We believe that the proposed bylaw is unresponsive to the concerns of up-slope owners and could be costly to property owners. Proposed bylaw's intent is to create an urban native forest of mature trees on the slope, even though other native species and other bio-engineering methods have proved highly effective in improving and restoring slope stability. The up-slope landowners are beginning to feel like scapegoats for the action and inaction of the City and others. The landowners at the toe of the slope have no responsibility to repair the degradation they have caused to their slopes. The proposed bylaw addresses only the responsibilities of the up-slope private landowner in prevention of landslides, focusing on restoring the slope of these private properties to a mature native forest. This has led to a proposed bylaw that totally ignores the issues of groundwater and landslide risk and the City's responsibilities for	<p>The existing and the proposed amendments address new development and new vegetation management falling under the exemption criteria. The existing and proposed regulatory improvements are not retroactive. Upslope and downslope residents wanting to address slope stability and previous damage are encouraged to work with a landslide professional and prior to any proposed works, owners must contact the City to determine if any permits are required.</p> <p>The proposed amendments apply to all landowners in the hazard slope development permit area wanting to maintain trees on the slope. Upslope owners tend to contact the City wanting to maintain vegetation for viewscapes. Downslope owners tend to contact the City wanting to maintain vegetation to address hazard trees.</p> <p>For new development in the steep slope development permit area, the proposed amendments to the development guidelines are far more prescriptive and require a detailed analysis of geohazards including drainage that could affect the proposed development, regardless of whether the geohazard originates on or beyond the development property boundaries. There are other concurrent City processes in motion to address existing stormwater management concerns.</p> <p>Note that hazard tree removal does require permission through a completed exemption form by a certified arborist. As is noted, a hazard tree is only hazardous if there is a target. As a general rule, hazard tree removal does not trigger the full development permit process requiring a landslide assessment. The</p>

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	such. The bylaw has (in their words) a "Two-Inch Rule," where up-slope property owner needs a development permit (a "DP") to cut a needle tree greater than 2" in diameter. This will be costly. If a tree is hazardous, it may be cut down without permission, but it depends on the "scale of removal". Even if it's dead, the City may still require property owners to get an expensive steep slope assessment for "dead trees". So, the exemption isn't really an exemption because it still requires a DP. It might be cheaper to just let hazardous trees fall naturally. The QEP that the property owner hires to apply for the exemption has been chosen by the City, creating their own pseudo-regulatory body for arborists. The processes and criteria are still uncertain and non-transparent.	full development permit process would only be triggered if extensive hazard tree removal was required.
<ul style="list-style-type: none"> • Groundwater • Yard waste dumping • Public workshop • Vegetation and soil disturbance • Infrastructure 	Groundwater is major contributing factor to landslides. Many of us left the 2022 public hearing with the impression there would be a City run workshop to identify the real problems. What happened to that workshop? Nobody is disputing that dumping of yard waste etc over the bank can add to landslide potential or that destruction of growth and soil can impact stability - don't focus solely on vegetation retention. In every case where there has been a landslide, there were wet conditions	<p>Council made no resolutions at the public hearing concerning a workshop. In April 2023, Council directed staff to host the information sessions which were the sessions held in June 2023.</p> <p>Agreed: surface water, ground water and wet conditions are major contributing factors to landslides. For new developments that trigger the steep slope development permit process, the proposed guidelines require that all aspects of drainage must be addressed in the landslide assessment report. As such, the proposed guidelines are much more comprehensive than the existing guidelines.</p> <p>With respect to existing drainage issues, which are not covered under the development permit guidelines for new development, City Operations is pursuing</p>

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<ul style="list-style-type: none"> • Neighbourhood Issue • Development Permits • City issue 	<p>or flowing water. It is ground water making its way downhill until it daylight somewhere. Groundwater may follow an old excavation with porous backfill, a stratum of granular material, or flows on top of hardpan. Kms of sewer mains downhill from homes on slopes or along tops of ridges may have been constructed without drains or trench dams to intercept groundwater and concentrating flows. This water eventually daylight and saturates the soil on the slope. I do not know if any sewer trench water was a factor in the most recent landslide. The City owns numerous strips of roadways up the hill and all those sewer trenches so they would share responsibility for groundwater control. These are complex, neighbourhood issues with legal responsibilities. City needs to coordinate efforts with all parties/ landowners to collect water and dispose of it safely. Otherwise, more landslides will occur. When people report a water problem, they should take some responsibility along with other property owners and the City. The City needs to assist with funding and administration because it usually is a neighbourhood issue. The focus of this process is still on tree and vegetation retention. DRAINAGE IS THE MAJOR ISSUE, as discussed at the Public Hearing. I have yet to hear of a</p>	<p>Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p> <p>Addressing existing conditions is a process that is separate from setting conditions for new development and these two separate processes are being pursued concurrently.</p>

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	Development Permit calling for ground water collection up the slope. What I have heard about is drainage collection at the toe of the slope. How does that help stabilize the slope?	
<ul style="list-style-type: none"> Views Vegetation maintenance Groundwater City responsibilities Acceptability of arborists 	<p>Proposed bylaw is costly, unreasonable and unresponsive to up-slope owners concerns. Public safety is being made the responsibility of the up-slope property owners through a process of tree-retention, where our views and property values are sacrificed.</p> <p>There are 3 main issues:</p> <p>1) Lack of holistic approach to slope stability with an overemphasis on large native tree retention. Man-made and natural water run-off, natural shifting of soil and restoration of habitat in the buffer zone at the toe of the slope should also be included. Proposed bylaw ignores City responsibilities. Proposed bylaw misses the responsibility that landowners at the toe of slopes have to repair damages caused by their developments.</p> <p>2) Two-Inch rule: upland owners are being forced to sacrifice views and property values if they want to cut a needle tree >2" in diameter by requiring a DP. A DP is also required to leave debris over 2" in diameter, <i>from any tree</i>, on</p>	<p>1) There is agreement that slope management has many aspects spanning issues with existing developments, new risks that occur over time as site conditions change, potential risks posed by aging infrastructure as well as risks that may be introduced during new development. The proposed amendments address new development and ongoing activities on steep slopes. With respect to existing drainage issues, which are not covered under the development permit guidelines for new development, City Operations is pursuing Council's directive to establish a Stormwater Utility and a user fee funding model which would support a system needs and risk assessments for a comprehensive 10-year Capital Plan including drainage servicing along the top of steep slopes.</p> <p>Addressing existing conditions is a process that is separate from setting conditions for new development and these processes are being pursued concurrently.</p> <p>2) The '2 inch rule' in the proposed exemption criteria is in place now within the existing steep slope exemption criteria. The exemption reads:</p> <p>Removal of trees where the tree trunk diameter is less than 5cm (measured 1m from the base); and d) Where the tree trunk diameter is greater than 5cm (measured 1m from the base) pruning, limbing and topping of trees provided a Certified Arborist provides a written opinion stating that the activity will not kill the tree.</p> <p>The proposed exemptions carry forward the 5cm removal allowance for needed trees and broadens the removal allowance for deciduous trees such as alders and</p>

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	<p>the slope. DPs are costly and require landslide assessments etc.</p> <p>3) The Exemptions are not exemptions because large scale removals may trigger a DP with associated assessments after the fact. Concern that a QEP or certified arborist that is <i>acceptable</i> to the City of Campbell River limits an owners ability to retain an arborist that is in good standing with their professional association and provincial regulatory standards. Concern that City is creating a pseudo-regulatory body without the legal authority based on unknown criteria. Fear that City will build a list of “acceptable” arborists who can apply for the exemptions on behalf of a property owner, but who advise that activities such as removal of previous yard debris and non-native plants be undertaken – a DP like process.</p>	<p>maples up to 20cm. A development permit will not be required to leave branch debris on the slope if it cannot be removed safely.</p> <p>3) There is already a caveat in the existing general environmental development permit guidelines (which also applies to hazard lands) that a development permit may be required for large scale hazard tree removal. This condition is being carried over to the proposed amendments. The existing exemption reads:</p> <p>Emergency management: Procedures to prevent, control or reduce flooding, erosion or other immediate threats to life, public or private property, are temporarily exempted from the requirement to obtain a City of Campbell River development permit. Following completion of emergency procedures, submission of a Development Permit may be required depending on the degree of the works and based the discretion of the Director of Development Services or other delegate. Emergencies eligible for an exemption include:</p> <ul style="list-style-type: none"> actions required to remove a hazard, including a tree, or to address an unstable steep slope, that presents an imminent danger to the safety of persons or are likely to damage public or private property, as determined by a Qualified Environmental Professional hazard tree condition assessments must specify assessment targets and must reference the Wildlife Tree Committee of British Columbia Wildlife/Danger Tree – Parks Recreations Sites module <p>Only on rare occasions has a development permit been required after hazard tree removal, such as the removal of many live trees where soils are wetted.</p> <p>A certified arborist following recommended professional pruning practises would not be rejected by the City. If there are questions concerning the</p>

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		arborist report, the protocol is for City staff to clarify the information. An arborist may well recommend an applicant consider restoration activities, but these additional works cannot be required under the exemption criteria.
<ul style="list-style-type: none"> • Difficult to hear • Fear of future landslides • City arborist assessments 	<p>It was extremely hard to hear what was being said, but the representatives did their best. I think perhaps a question and answer forum would have been more informative. There is tremendous concern about future landslides but no solutions were presented. Could the City arborist write a report for every property along the hazardous portion of the strip, perhaps every few years? That would produce a starting point with suggestions on keeping the bank as healthy and stable as possible. The City has already paid for a geotechnical report, so they are aware of areas that might need special drainage or retaining walls, if that information was given to property owners they would at least not be able to say the City didn't advise them. I know there are no guarantees, but it feels like this is a situation that needs</p>	<p>Although staff and certified arborists rely on the City arborist to review tree reports and answer technical questions, that position does not have the capacity to assess individual private properties.</p> <p>The geotechnical that was recently commissioned by the City was specific to the recent landslide and City infrastructure.</p>

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	cooperation between the city, the upper property owners and those below.	