

Section 10: Environmental Management

Sub-Topic	Plan Reference	Feedback
Broad Objectives	10(D)	P. 78 – Broad objectives – do not include objectives. Mitigate noise – with what standard as an objective?
	10(B)	GWl strongly supports the Environmental Management Goal 10(B) that Victoria harbour and coastline supports healthy populations of fish and marine life.
Overview		Overview text and policy content is too much aspiration – Victoria isn't an ecosystem as clear from Map 9 – city is <u>urban</u> environment.
		Incorporate the message that density is good not bad; EIA should be measured per capita.
		Disconnect in meaning between 2 % of ecosystem and 18 % heavily treed – one is ecosystem, other is not.
		Give local and regional parks recognition for providing some habitat.
		Not enough emphasis on Victoria as a green city.
Ecosystem Management	Map 9	Map 9 Sensitive Ecosystems - Please note that the Harbour Shoreline Ecological Ratings are now about 10 years old and overdue for revision. For example Point Ellis Park (between Dockside and the Bay St Bridge) has undergo restoration and should be rated as high to very high. <i>The City should urge CRD to revise the ratings -perhaps co-funding with other municipalities</i>
	Map 9	Map does not recognize Rockland Woodland Garden (Joan Cr. And Craigdarroch Rd)
	Map 9	Consider the use of a legend with explanatory descriptions of each sensitive ecosystem.
	Map 9	Harbour Ecological Rating : A reference to the basis for these ratings, and/ or an appendix presenting that would be useful.
	Map 9	I just noticed that map 9 credits the Victoria and Esquimalt Harbours Society with the ecological rating information. It should actually be VEHEAP – Victoria and Esquimalt Harbours Environmental Action Program.
	10.1	Members were pleased to see the recognition of the importance of working with neighbouring municipalities and the CRD to coordinate the protection and restoration of the Gorge Waterway.
	10.1.1	I suggest including shore areas here as needing identification of additional priority areas.
	10.1.3.	I am a big fan of DPAs, in particular for protection of the natural environment, its ecosystems and biodiversity. If these will be ready for inclusion in the OCP I would appreciate the opportunity to review them.
	10.1.3.	The trouble with guidelines is that developers then take up so much of Council's time trying to argue for variances and exceptions.
	10.1.3.	I believe there should be no development at all in these areas. No need for guidelines
	10.1.3.	We have so few of these areas left in the city, let's fiercely protect them all.
	10.1.3.	I don't believe any permits should be allowed for environmentally sensitive areas, therefore there is no need to have guidelines as these areas should be permanently off limits to future development proposals.
	10.1.3.	Are you seriously going to adhere to this? e.g. Have you checked the harbour lately? Until some backbone is shown, these feel good declarations are a joke.
	10.1.3.	Don't allow development in sensitive areas.
	10.1.3.	Especially Garry Oak ecosystems.

Sub-Topic	Plan Reference	Feedback
	10.1.3.	I don't agree with development of these areas!!! I doubt very much that "guidelines" would be even remotely sufficient. These sensitive areas should allow MAINTENANCE, not development. Any good city plan has to include decent greenspace, and no I don't mean just a block of mowed lawn here and there with a park bench!!!! Too many of the questions in this survey are vague and nondescript. A "guideline" does NOT sound sufficient to me.
	10.1.3.	Let's develop more green spaces in our city!
	10.1.3.	I have to see the guidelines first.
	10.1.3.	With the assumption that only a very small proportion of those areas identified on Map 9 would ever be considered for development. It would add clarity to create another map that shows only those areas that are currently in private ownership (eliminate the parks and public spaces.
	10.1.3.	no. i agree that there should be NO development considered for environmentally sensitive areas. and there are more than you've identified here, for example the oak meadow at the corner of bank and leighton streets. greenspace should be increased and absolutely protected in our city.
	10.1.3.	The wording is a bit confusing - I am interpreting it as new proposals for development within environmentally sensitive areas, which then I disagree with.
	10.1.3.	Don't develop within environmentally sensitive areas. Development guidelines are development starting lines. Don't let the developers take the city there.
	10.1.3.	Ecological rating is a relative term: the entire harbour has been heavily modified by human activity and should be open to smart development.
	10.1.3.	Zone sensitive areas to further protect them from development.
	10.1.3.	Include zoning areas that have native ecosystems for its preservation.
	10.1.3.	A rise in sea levels and discouraging high densities in these areas; Implications of rising sea levels in Climate Change and Emergency Management sections; dealing with the potential impact on property.
	10.1.3.	Suggestion that density not occur within 10 feet above sea level. Planning for weather impacts in the next 40-50 years with respect to sea bluffs and Ross Bay Cemetery.
	10.1.3.	To the best of my knowledge there has been no study done of the extent of pollution in the harbour --- especially harbour sediments. There is not mention of cleaning up the harbour or even assessing its ecological health. The City continues to allow float plans that emit Volatile Organic Compounds into the harbour along with excessive noise and air pollution. The plan does not deal with the air and noise pollution from Ogden Point and places no real restrictions on similar activities that could occur elsewhere by the GVHA (e.g. Fisherman's Wharf).
	10.1.4.	Concerns related to protecting sensitive lands that are regulated by other levels of government;

Sub-Topic	Plan Reference	Feedback
		Some regulations in place to protect these lands; other regulatory tools may provide additional protection.
	10.1.4., 10.5	Expecting volunteers to control invasive species is not viable without a paid workforce working on maintenance. Volunteer efforts are never evenly continuous and setbacks in invasive control are rapid and frequently irreversible. Where is stream daylighting in the document?
	10.1.5	Look at conservation covenants for preserving green space since contributes to whole community
	10.1.5., Map 9	Include "marine foreshore" in the statement encouraging conservation covenants. In particular, the foreshore along the Gorge Waterway above Selkirk Trestle should be given special consideration as indicated on Map 9, Sensitive Ecosystems.
	10.2	S.1 0.2 -replace 'biodiversity' with 'resilience'
	10.2	Biodiversity is important but not as important as properly functioning, healthy ecosystems.
	10.3	S.10.3 -is the Natural Assets Inventory the same as the Natural Areas Atlas?
	10.3	The policy to create and monitor a natural asset inventory is a great initiative. I recommend including a policy that directs partnering with community organizations and schools to help complete the monitoring. Perhaps schools could undertake biological and species monitoring on their properties each year as part of the science curriculum, and some environmental non-profit organizations would be pleased to assist with counting species/specimens in different areas. There are also a few University of Victoria courses that could be integrated into the inventory as well. I am happy to brainstorm a list of these organizations and contacts if you need it.
	10.3.3	S.10.3.3 -replace 'initiatives such as' with 'coordination of'
	[gap]	Perhaps as an objective (or an action item in Plan Administration) , "Conduct Environmental Assessments of plans and development proposals to identify potential adverse effects and seek ways to avoid, mitigate, or compensate for such impacts."
		Positive: policies around natural assets, native species, wildlife
	[gap]	Incorporate policy on impervious surfaces in S. 10. Specifically, use % of impervious surfaces as standard for development, consider relative to densification: tie to green building policy; tie to storm water utility fees.
		GWJ recommends that species that are considered threatened or at risk in Victoria should be addressed, and provisions made for their protection (e.g. Great Blue Heron, Olympia Oyster)
		Highlight protection of blue and red list species in environmental management section
		These are all motherhood statements. The OCP has no substance behind these statements. There are no targets, no objectives, no standards. Put in performance zoning.
		At a complete loss to determine how public works and development can ever promote local ecosystems.
		SEI mapping for Harbour Eco Rating is out of date. Mapping should be ground tracked and updated to reflect eel grass beds, shorebird habitat use, and riparian cover.
		The principles are great. There needs to be stronger words, though, when addressing developers. The City needs to not only "encourage" but to "demand". These are the green and energy-efficient guidelines, period. No "wishy-washy" back-and-forth at this stage of the climate dilemma.
		Guidelines are good if you're not prepared to block development in environmentally sensitive areas - but keeping our parks and wildlife areas intact is far more important.

Sub-Topic	Plan Reference	Feedback
		We must do everything we can to protect and preserve the sensitive ecosystems in and around Victoria! I support the concept of designating the entire area a UN Biosphere Reserve!
		Yes. Definitely.
		I do not agree with the areas selected as sensitive areas necessarily. For example the Victoria Harbour is a harbour not a sensitive wetland. There are already numerous levels of regulation regarding activities in this area. We do not need another layer of regulation.
		We need to protect what is left. Force developers to create something inspired to co-exist with those ecologically sensitive zones.
		I largely agree but specifically, where the dark green line is located along the Songhees, I think the City is making a mistake. The Songhees is culturally dead and a marina there that will improve the seabed and cultural amenities, without harming the marine environment, should be supported. At Fisherman's Wharf, opposite, there is abundant wildlife - seals, otters, birds, and undersea critters, living the high life thanks to the human activity there and free herring.
		Natural areas need to be zoned off limits for development proposals - not left to the mercy of future planning. These maps are sadly outdated - drawn from old information and should be discarded for a better, more current study. In addition, they are based solely on the presence of individual, threatened species and don't reflect the endangered status of the ecosystem remnants themselves that aren't included on these maps. Trying to save species without saving the environment they need to survive is futile.
		Why do we need development permit guidelines in environmentally sensitive areas? There MUST not be any development in environmentally sensitive areas, period!
		I'm not 100% sure what this question is asking. I feel that the City of Victoria needs to strongly protect our limited greenspaces and environmentally sensitive areas. I feel that no development should take place within environmentally sensitive areas and that even developments adjacent to environmentally sensitive areas should have to take into consideration what impact they will have on these areas. We need to protect our greenspaces as well as we can within the City of Victoria.
Terrestrial Ecosystems	10.4	Further, the question is posed as to whether the parks planning referenced in S.10.4 could be linked to the Regional Parks Strategic Plan, currently in draft?
	10.5	"The only comment I can make (and this may be covered somewhere else in the document?) is section 10.5. They can also use bylaws under the Community Charter Act to control or eradicate invasive species."
	10.6	Bylaw to address soil deposition would be good, as affects grade.
	10.6	The clastic material underneath most of Victoria is glacio-marine sediments laden with heavy metals. Disturbance of this material must be kept to a minimum. Construction projects that require excavation of this material must have

Sub-Topic	Plan Reference	Feedback
		very strong controls to insure this clay does not get into the storm drains. Vacuuming the clay out after it has reached the drain is a very poor practice. Excavation into the clastic layer must be restricted to a very small area in the central core.
		Natural Features should mean Native Ecosystems that do not require seasonal plantings. In Beacon Hill Park we have wetlands, old growth forest, Garry oak parkland and herbaceous meadows. These should be maintained as a legacy of our native landscape and support towards Climate Change policy.
		For horticultural features, encourage aesthetic native and edible plants, and especially community gardens.
		Sensitive areas like the Southeast woods and the wetlands of Beacon Hill Park are perceived as negative spaces. Do not develop because people can be educated that these are wonderful and rare places to enjoy. Also, make village designs take cues from the neighbourhood they are in. Unlike Castana!
Fresh Water Ecosystems		And please take the lead in cooperating with Saanich and Oak Bay in developing the natural corridor of Bowker Creek. Take the lead in developing the Victoria section of that green corridor which can be a valued and renowned attribute of our city for many generations.
	10.7, overview	Could also mention the historic burying of creeks throughout Victoria. The BCI is particularly encouraged by direction outlined in Fresh Water Ecosystems, towards integrated watershed planning (although we would suggest the term “integrated watershed management” planning) and the stated direction for collaboration, daylighting of streams and improvement to riparian habitat, including implementing management plans for the Bowker Creek and Cecelia watersheds.
	10.9	Strong interest in protecting the Bowker Creek watershed and daylighting some portions in accordance with the Blueprint Plan.
	10.9	The BCI encourages the City of Victoria to integrate the Bowker Creek Blueprint’s Principles and Actions for Watershed Management into the OCP. These principles are (please see Bowker Creek Blueprint section 4, for full details): 1. Use creek-friendly management approaches wherever possible. 2. Adopt requirements to reduce effective impervious area for new developments. 3. Construct infiltration and retention features in boulevards. 4. Incorporate Bowker Creek goals into municipal plans. 5. Maintain effective communication of the Bowker Creek vision, goals and actions. 6. Plant trees and shrubs and protect existing trees. 7. Purchase and protect key land in the watershed. 8. Incorporate proposed greenways into land use planning. 9. Include climate change adaptation and mitigation in all activities.
	10.9	We would suggest adding the following into the Fresh Water Ecosystem after bullet 10.9: o 10.10 Protect and enhance fresh water ecosystems/habitat by: 10.10.1 Establishing Zoning regulations and applying Development Permit Area guidelines in consideration of best practise, that include appropriate building setbacks, guidance for enhancing habitat values and integration of climate change adaptation planning; 10.10.2 Investigating the acquisition and designation of creek side ecosystems through a parks acquisition strategy and; 10.10.3 Integrating restoration of natural creek side features into the development of the Greenways, where appropriate.
	10.9	Nature: High density and good access to nature are entirely compatible. In particular, the Large Village Centre at Fort and Foul Bay has a wonderful resource, Bowker Creek. Daylight Bowker Creek in that section and make it the wonderful natural feature of the Large Village Centre. With Bowker Creek running at the heart of the Large Village Centre at Fort and Foul Bay, with the natural sounds of running water and of the birds that populate its green

Sub-Topic	Plan Reference	Feedback
		corridor, the many people who live, work and shop there can be refreshed and balanced by nature without travel to the country to find it. Give the creek a wide corridor where it may curve and pool, and where native plants may grow on its banks. The creek is ready and waiting beneath the site of the Large Village Centre at Fort and Foul Bay. Feature it!
	10.9	5 other major stream systems to consider.
	10.9	And please take the lead in cooperating with Saanich and Oak Bay in developing the natural corridor of Bowker Creek. Take the lead in developing the Victoria section of that green corridor which can be a valued and renowned attribute of our city for many generations.
	10.9	Daylight more creeks such as Cecelia. Overall some good concepts.
	10.9, 20.22.5	20.22.5 Integrate Bowker Creek watershed protection into land use planning and consider daylighting opportunities. COMMENT: Good idea and would welcome the opportunity to do this. This might actually help to solve the traffic congestion at Doncaster entrance and would encourage pedestrians and biking. ACTION: Work with Mall owners to see how this could be accomplished.
		It is essential that we start protecting our fresh water.
		Stop pumping underground streams into the ocean in storm drains. This water can have many uses but is currently wasted.
Marine Ecosystems and Shoreline Management	10.10.6	Focus on what will get done – follow through to implementation.
	10.11	10.11 This proposal, of the City elevating a private land owner to a status above residents is just wrong. It also shows an absence of understanding of the area.
	10.12	I'm worried when partnerships could make poor recommendations or not favour natural systems for their idea of a solution. There has been a history of recommendations to deal with shoreline erosion that negatively impact the natural ecosystems. Please ensure all recommendations make sensitive areas a priority rather than a solution that devalues the native landscape.
	10.13	[Assess and mitigate climate change impacts on marine and shoreline Ecosystems...] A very ambitious and challenging item!
	10.13	The sea level is not going to rise appreciably during the thirty+ years this community plan is in effect. Nor will the climate change much during that time.
	[gap]	There should be recognition of the fish and other marine species that migrate through Victoria Harbour and into the Gorge. This includes salmon, cutthroat trout, herring and the variety of birds, otters, seals and other animals that feed on them....
		It is critical to maintain biodiversity in the face of a changing climate. This is another reason to provide protection for our shorelines and adjacent nearshore and subtidal habitats...[e.g. area below Dallas bluffs for fish spawning]... An important component of a comprehensive approach should include ongoing monitoring of marine and aquatic flora and fauna.
		Not good enough to regulate shoreline development. Need to protect all shoreline as marine habitat and to prepare all of to be healthy, functioning ecosystems after sea level changes - not by hardening it to protect human-valued structures.
		Section 10.10-10.13 an excellent addition which was missing in the earlier version 10.10.3 makes reference to

Sub-Topic	Plan Reference	Feedback
		planning for sea level rise - and refers to Section 12 where Sea Level Rise is conspicuously absent
Urban Forest Management	10.14	<p>Please allow for nut trees on public land to increase urban forest and food security, and to diversify the canopy so more resilience in urban forest.</p> <p>Preservation of tree cover - please revive the Urban Forest Master Plan.</p> <p>We the undersigned artists, photographers, writers and tree lovers have produced a five week show of urban tree art and held a day of talks/readings (October 30/10 at Overleaf Café/Bookshop, Pandora Avenue) expressing concern for local trees and green space preservation. We urge you to improve provision in Victoria's new Official Community Plan for protecting Garry oaks, other native and non-native tree species, and green space and gardens generally, both private and public. We are alarmed at the pace of development and the destruction of the urban forest and heritage gardens. We submit that the Official Community Plan must decide on a minimum percentage of landscape to be reserved for continuous tree canopy and be backed up with a Significant Tree Designation and revised zoning rules for the protection of unpaved space. We would like to remind you of the priceless benefits derived from trees: they clean the air, provide shade, sustain water, support wildlife, moderate temperature (shading streets in summer, insulating buildings in winter), and generally provide aesthetic value to the city. The presence of large tree groupings has been shown in numerous studies to increase real estate values, lower crime rates, buffer noise, and lower the incidence of depression in the human population.</p>
	10.14	An effective tree protection bylaw would do more than any of the above proposals to achieve the above objectives. Allow fewer exemptions in the tree bylaw.
	10.14	Please revive the urban forest.
	10.14	Consider using softer more naturalistic and native plantings in roundabouts, medians, etc to provide a continuity and extension to the surrounding native landscape. They do this very well in the town of Bend, Oregon AND they incorporate (in roundabouts for example) large sculpture within it. So...integrate landscaping with public art/sculpture. In Berlin, Germany the medians are planted with tall grass, softening the hard cityscape and making it feel very relaxing!
	10.14	Our native landscape gives a "sense of place" as we live in this special Garry oak ecosystem, old growth coastal fir forest and wetland. We need to protect it and encourage to expand it with native plantings and removal of invasive species.
	10.14	There is little said about trees, an important indication for environment. So many places lose their mature growth like the new Terra Verde which covers the whole ground. There is no terra showing and the only green are spindly little trees. At least 8 trees were cut including a large one, possible planted as a a Mclure garden.
	10.14	On p. 81, Urban Forest Management, add "Balances the use of education, incentives, and regulation to protect trees and expand forests on private land."
	10.14	Tree protection bylaw? Such a bylaw could include special protection for native/endangered species of trees.
	10.14	This section could be enhanced by adding the statement about the importance of planting native trees and shrubs wherever possible. The City could take a leading role in planning for climate change by planting native Garry Oak ecosystem vegetation, adapted to a warmer drier climate that experts are predicting for the Victoria area.
	10.14	Another recommendation is to encourage planting along marine and riparian shorelines to provide cover for intertidal and stream habitats. Vegetated shorelines help reduce temperature extremes by providing shad in summer and protective cover in winter.
	10.14	Food systems are incompatible with urban forest enhancement. Section 10.14.2 is pure nonsense. What is needed is an awareness of how much trees depend on shrubs and bushes to retain leaf droppings and thus enhance the soil. The City of Victoria needs a lot less of the current practice of removing bushes to improve site-lines. The

Sub-Topic	Plan Reference	Feedback
		aggressive removal of undergrowth such has been seen over the last ten years is guaranteed to deplete the urban forest. The Community Plan needs an initiative to restore the shrubs and bushes.
		Trees, shrubs and bushes are sufficient tools for addressing noise impacts. Development proposals that anticipate removing trees to open up sitelines will always have noise problems.
Ecological Education	10.15	Make more specific: broadly include examples of education initiatives including those in operation, e.g. PRC programs involving naturalist interpretation.
	10.15, 11.16, 15.20	Add an education component: how do we empower citizens to reduce solid waste?
Pollution	10.16-10.18	While air, noise and light pollution are addressed here, there is no mention of aquatic and marine pollution prevention. Though this may be addressed in other sections of the OCP, it would be appropriate to include a statement here as well.
	10.16- 10.17	Concern about vehicular pollution along Fort St. and Shelbourne St. and its health impacts on residents and hospital patients. Several comments calling for more transportation options to reduce the volume of SOVs and other motor vehicles to and from Jubilee Hospital, including the relocation of the transit exchange proposed at Foul Bay Road to the Bay Street side of the JH site.
	10.16	Provide quiet tools and vehicles for city workers. Create a system for composting without the terrible smells residents living near the Parks, Recreation and Culture yard encounter at specific times of the year.
	10.16	Impacts of lighting (i.e. harbour pathway)on fish and bird habitat
	10.16	include requirements to meet enviromental standards for noise & pollution
	10.16	Where is there any mention of how to manage tourism's affect on residents? We must develop better transportation and focus on air quality problems generated by float planes, helicopters and cruise ship emission as well as the noise and emission from buses serving cruise ships. There should be agreed upon targets on air quality. Measuring should continue to make sure it improves.
	10.16, 10(d)	The sustainability strategy of both the City [and the CRD] should be based upon best-practice standards, including those for local air-shed quality and community noise, as promoted by the World Health Organization. The OCP pays insufficient attention to environmental issues associated with tourism such as cruise ships, and people movement problems such as the use of large highway buses for tourist travel. Alternate modes of transportation such as water-craft shuttles need to be considered
	10.16, 10.17	<p>the vision 20.15 and strategic directions 20.16 look very good, except: CRUISE SHIPS AND THEIR POLLUTION. something regarding the cruise ships and their significant environmental impact is needed. the OCP, as far as i can tell, seems to ignore the impact of the cruise ships. there is a small mention in 20.15.2. but there needs to be a line in 20.16 and also section 12 (climate change and energy) stating something like:</p> <ul style="list-style-type: none"> improve and work to reduce the serious negative impacts of the cruise ships and their related buses, taxis and other transportation in James Bay. encourage environmentally friendly transportation for cruise ship passengers. <p>the cruise ships (and related transportation) cause considerable air, water, light, and noise pollution. the city seems</p>

Sub-Topic	Plan Reference	Feedback
		intent to ignore all the pollution, but that is only causing more and more frustration. a better system for buses and taxis needs to be designed, and (half-empty) bus and taxi trips needs to be reduced. other environmentally friendly transportation needs to be implemented for the passengers so that they can get to downtown WITHOUT causing more pollution and disruption to the people living in James Bay.
	10.16, 10.17	The OCP focuses on GHG Policy – rather than local pollution issues. The GVH policy has rules and guidelines that do not necessarily address GHG being emitted within the region. Of particular note is the exclusion, within GHG mapping exercises, of cruise ship and perhaps tourism transportation emissions. Failure to take account of cruise ship emissions, including both local pollutants and green-house gases, and to work to reduce them, makes a mockery of local estimates and related targets.
	10.16 – 10.18	Pollution should not be belittled/diminished by referring to it as 'concerns'. The City has real problems. Standards should be included within the plan. Not absolute standards, but recognized best practices - link to WHO, CSA, or whatever organization has best standards. City needs to address all pollution - not just fro new developments. very shortsighted plan. Can't claim to be green when City is permitting (and sometimes subsidizing) pollution.
	10.16 – 10.18	Environmental management - Need to improve part on air quality and noise. Tiny mention is all, no standards. The City should adopt WHO air quality and noise guidelines.
	10.16 – 10.18	As well, noise pollution needs consideration. Dumpsters/pick up/collection causes increased noise so these disposal units need improved access/link with trucks to reduce crash/bang early morning noise.
	10.17	P. 81 Pollution – 10.17 talks about transportation planning, yet transportation section ignores air and tourism transportation
	10.17	Carbon footprint - Ignores impact of tourism. Must address: diesel buses, cruise ship emissions, float plan emissions, helicopter emissions.
	10.17	If the City wants to be a world class city, it needs to adopt, at minimum, WHO guidelines for noise.
	10.17	Sustainability has little to do with greenhouse gases. It has much more to do with local air pollutants. If you fix the local pollution problems, the results will be good for greenhouse gas emissions. The opposite corollary does not necessarily hold. Think local and act local and your global contribution will follow.
	10.17	If the City wants to be a world class city, it needs to adopt, at minimum, WHO guidelines for air quality.
	10.17	The SO ₂ and particulate emissions from cruise ships and the VOCs from floatplanes and helicopters are the most important large pollutants. But no ones seems to be counting these in the sustainability process. Indeed counting only local building and locally-owned vehicle emissions while not counting tour bus, aircraft and particularly cruise ship emissions makes a mockery of the number counts and leads to erroneous advertising of the city's air quality and sustainability.
	10.17	If you are considering making downtown Victoria more attractive PLEASE CONSIDER: Enforcing no-smoking LAW that is constantly disregarded. It is disgusting to walk around the Urban Core inhaling others' poisons constantly. Consider HIRING LOCALS TO ENFORCE THIS LAW.
	10.18	Noise and air pollution are major problems and the City must address them with respect to site-specific conditions. General policy in the OCP isn't sufficient
	10.18	Need to address pollution in areas beyond Harbour, such as parks where light pollution from special events has impacts on nearby residential areas.
	10.18	Noise, light and pollution and their effect on the quality of life of Victoria's residents does not seem to be included in any of the sections.
	10.18	U se all tools available to address noise impacts in development proposals adjacent to the Working Harbour. Given

Sub-Topic	Plan Reference	Feedback
		the orientation of the Harbour designations and boundaries, it is assumed that this is directed at industrial and commercial development. It would seem that this could well be applied to all developments throughout the various areas of the Harbour.
	10.18	If people don't want to live in an active, working harbour, let them move away. Noise and activity is a part of a functioning, living city.
General – Other		Protect private land for food production, not public. Farm the farms, Garden the gardens - not the Parks, Recreation and Culture.
		The OVP puts too much emphasis on planning - as opposed to doing.
		In general I think the draft is much improved with respect to addressing shoreline management issues, particularly Section 10.10. However there are still some issues that merit further consideration
		Sections 10 (Environmental Management) and 11 (Infrastructure) could benefit from additional cross-reference. For example, the broad objectives of Section 10 could also include reference to proper management of liquid and solid waste, and indicated in Section 11.12 for example.
		A vision of a revitalized harbour area is not reflected in the Plan. The Plan ties the City to old technology and an inhospitable environment with unknown chemical pollutants creating airshed difficulties and no healthy or beautiful gathering place for residents.
		It is not enough to say the City has intentions of becoming “green”, and it is hypocritical to ignore the major sources of pollution and green house gases in the City because the GHG “rules” permit their exclusion.
		Environmental Metrics - air quality, noise, and traffic volume/congestion measures - are not identified within the OCP. Although traffic is discussed under transportation, the discussion is quite limited, with a focus on public transit.
		The sustainability strategy of both the City and the CRD should be based upon best-practice standards for local airshed quality and community noise, as promoted by the World Health Organization.
		Given the environmental challenges, the direction from higher-level governments and their plans, and the resources available to develop a comprehensive local planning process, the Draft OCP addresses many concerns and provides ample opportunity for neighbourhood participation in actions that will improve the liveability of the City in general and the Rockland neighbourhood, in particular
		I am disappointed that environmental health targets aren't included in the OCP
		Need stronger language about using parks/urban forest to connect ecological areas. Rockland plays a role.
		Chapter Title The title to this chapter lumps the environment into infrastructure with the use of the word “management.” This aim of this chapter is to enhance ecological function or health with a goal of improving ecosystem processes. If the City wants to “manage” the environment as part of infrastructure I recommend using the term green infrastructure. However, I believe that what we are doing in this chapter is to enhance the environment. I recommend renaming this chapter something like ecological function or ecosystems. I note that we do not manage the economy, which is composed of similarly permeable systems as the environment.
		Use bio-swale image in Climate Change and Energy
		Weak language is some policy statements. For example, what is meant by “support education...?”

Sub-Topic	Plan Reference	Feedback
		<p>Progress measures for this Chapter could include:</p> <ul style="list-style-type: none"> • Percentage increase in the urban forest on City land (in parks and on boulevards); • Percentage increase in shoreline protected through development permit area designation; • Percentage increase in shoreline on which ecological restoration activities have occurred in partnership with community organizations; • Percentage increase in rainwater detained [link to infrastructure chapter].
		Integrate animal/natural habitat into the city overall. Conditions need to be improved for pets as well as wild animals.
		The term shoreline is no longer an acceptable descriptor of marine shore boundaries. In tidal waters, the land-water interface ebbs and peaks twice daily, and varies continuously both laterally and vertically in between. As such there is no static identifiable “shore line” ? More appropriate terms for this in the context of harbour and coastal management would be “shore zone” or “land-water interface”.
		Plan does a good job discussing biodiversity. However, quality of the environment needs to be a central theme of the plan. A community is first of all a people place.
	[gap]	Steps towards analysing where fresh water moves and preparing for potential changes that may come with climate change.
		Section 10 – P. 81 – No “Measuring Progress” performance indicators. I highly recommend “Measuring Progress” performance indicators be included in each section.
		Section 10 appears to contain only one explicit reference to the Capital Regional District (CRD) (S. 10.50); otherwise, the policies reference "senior government". It is not clear whether the CRD is considered senior government in these instances? For example, in S. 10.15, there is opportunity for regional support and coordination through the Sustainability Institute, Parks Programs and outreach and it may be beneficial to list the region specifically, rather than the broad reference to 'senior government'.