



Provincial Agricultural Land Commission - Staff Report Application: 52151

Applicant: Hans Buch
Local Government: Bulkley-Nechako

Proposal: SUBDIVISION - Proposal to subdivide 9.5 ha into a minimum of 4 parcels. A minimum of 3 lots are proposed on the eastern portion of the property and one 4 ha remainder lot on the western portion of the property. The western portion is only accessible by water.

BACKGROUND INFORMATION

The applicant is applying for subdivision because they feel that the land is not suitable for ranching but would be suitable as rural residential and/or small lot agriculture.

PROPERTY INFORMATION

PID: 015-493-164
Legal Description: District Lot 325 Range 4 Coast District
Property Area: 9.5 ha
ALR Area: 9.5 ha
Purchase Date: August 15, 2006
Location: 43077 and 43083 Blackwell Road on the north shore of Ootsa Lake
Owner: Hans Buch

Total ALR Area:

LAND USE

Current Land Use:

Residential - 2 dwellings, 2 shops

Surrounding Land Uses:

North: ALR - 80 ha Residential, road, forested pasture
East: ALR - 2.4 ha residential
South: Ootsa Lake
West: Ootsa Lake

PROPOSAL DETAILS

Subdivision - ALR Area: 9.5 ha

Number of Lots	ALR Area of Lot (ha)
1	2.2
1	1.2
1	4.0
1	2.1

Agricultural Capability:

The majority of the area under application is rated as: Secondary

Source: CLI

Mapsheet: 93E.089

PREVIOUS APPLICATIONS

Application ID: 22407

Legacy #: 11509

Applicant: Alan Blackwell

Note: December 1980 - The applicant applied to sell the portion of Lot 325 west of the Bay with that part east of the 1/2 Lot 467 which lies west and north of Lot A, Plan 4145.
The ALC approved the application.

RELEVANT APPLICATIONS

Application ID: 6495

Legacy #: 20942

Applicant: Alan Blackwell

Proposal: To establish four tourist cabins on the 2.3 ha property.

Decision:

Resolution #	Decision Date	Decision Description
511/1987	April 24, 1987	Allow as requested

LOCAL GOVERNMENT INFORMATION

Official Community Plan:

Bylaw Name: N/A

Zoning:

Zoning Bylaw Name: N/A

Comments and Recommendations:

Advisory Planning Committee

The RDBN should undertake the process to create an OCP for the southside of Francois Lake as soon as possible. There is concern regarding the potential for land use conflict between the proposed residential/recreational properties and surrounding agricultural uses. A reduction in the number of proposed parcels, and an increase in parcel size, would reduce this concern. If the ALC were to approve any subdivision of this parcel, that approval should be conditional on the Regional District first applying zoning to the property. This would allow the community an opportunity to provide input regarding development in the area.

Board/Council

The Bulkley-Nechako Regional Board recommend the application for subdivision for denial as per the Planning Staff's comments.

Ministry of Agriculture and Lands

The Ministry of Agriculture and Lands does not support the application for subdivision as it is currently presented for the following reasons:

- 1) The smaller lot sizes proposed will limit the agricultural options for the owners. Larger lot sizes allow more agricultural options.
- 2) The addition of many small lots in the area increases the possibility of future conflict with surrounding agriculture.

Planning Staff

As a result of the agricultural and land use concerns associated with this application the Planning Department is recommending that the application be denied. Also, the Planning Department recommends that if the ALC considers approving the subdivision, that approval not be given until the Regional District has had a opportunity to apply zoning to the property.

To ensure that the property owner must comply with any future rezoning, and not allow the property owner to take advantage of Section 911 of the Local Government Act (non-conforming status) a covenant ensuring compliance to zoning is also recommended prior to ALR approval for subdivision.

ALC STAFF COMMENTS

It is recommended that the Commission consider the following:

- 1) The CLI rating for the 9.5 ha land portion of the 127 ha property is 6:5T 4:4C, but is not currently used for agricultural purposes by the owner. 9.5 ha of land is in the ALR, the other 117.5 ha were inundated by flooding of the Reservoir in the 1950s.
- 2) The Applicant believes that the subject property's size and configuration limits its capability for agricultural use. In addition, the lakeshore location is subject to fluctuating water levels from the reservoir and subsequently has a steep eroding shoreline (See Background Info - Photos).
- 3) There is concern from the Bulkley-Nechako Planning Staff that the development of small lots for residential or recreational use will conflict with nearby agricultural operations.
- 4) The Applicant hopes that the western portion of the property can be used for agriculture by them, or by a new resident. The western portion is limited to water access only at this time.
- 5) Electoral Area E, south of Francois Lake where the subject property is located, has no official OCP and is not zoned. If the subdivision is allowed, the Regional Board of Bulkley Nechako and community believe that they will have no role in determining what type of density and development is appropriate for the area.
- 6) The applicant has included a rationale for their subdivision (See Background Info)
- 7) 3 letters of opposition of the subdivision were received by the ALC stating that:
 - The lots on Ootsa Lake are on the Rio Tinto Alcan reservoir which has large yearly fluctuations in water level and leads to erosion of shoreline.
 - An increase in small lots will inflate the value of surrounding agricultural land and increase taxes.
 - New residents may not be aware of, or conflict with the "Open Range Policy". Under this policy it is the responsibility of residents to fence their properties to keep cattle out, not the responsibility of cattle owners to fence them in.
 - Issues of sewerage and drainage on the sloping subject property
 - Disturbance of wildlife (fox) habitat
 - Conflict between pets and livestock

The Applicant has provided a rebuttal to these concerns. (See Background Info - RDBN Letter)

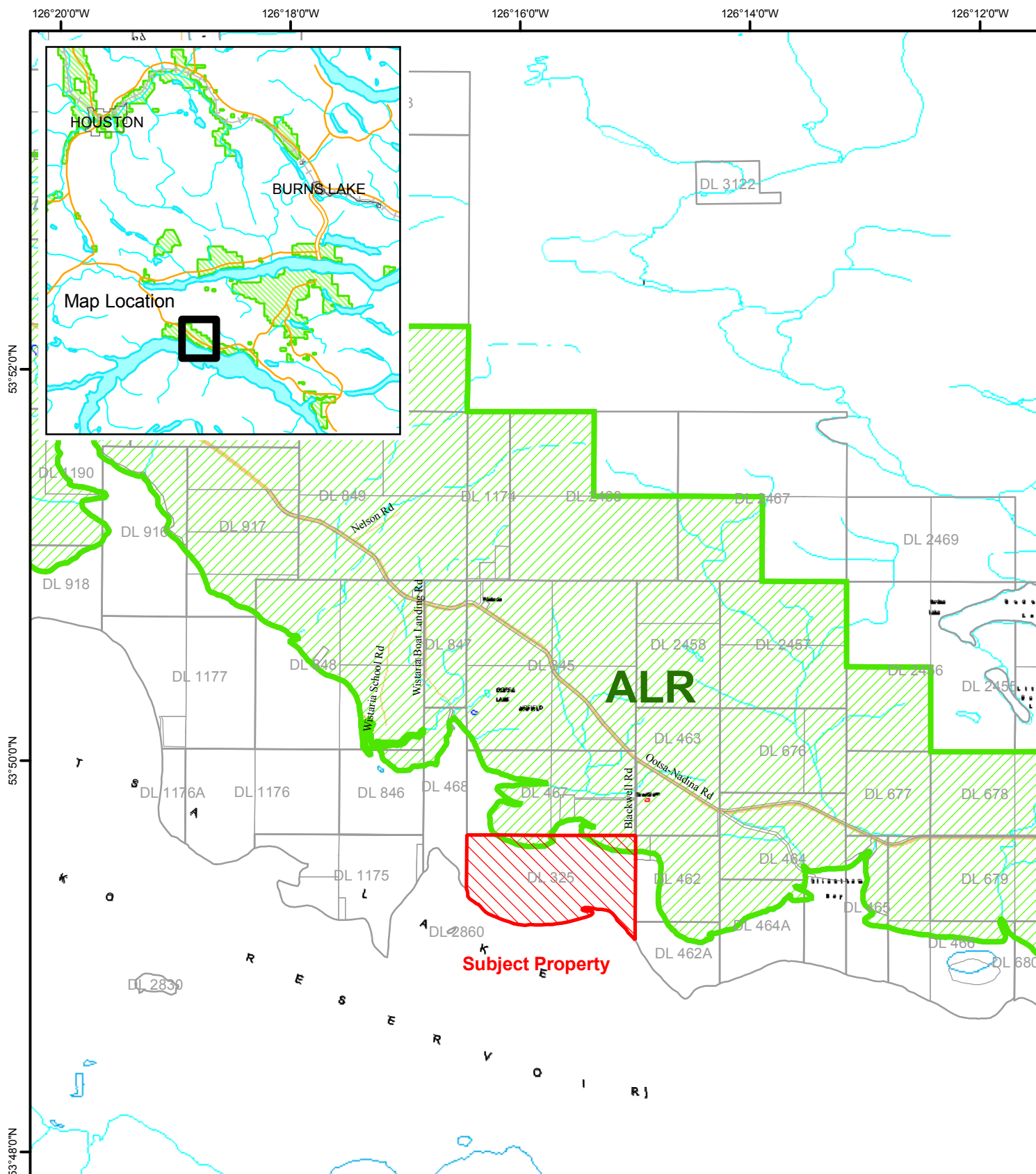
- 8) Note: The survey plan and proposal sketch are from the Applicant's original proposal for 7 lots. The Applicant is flexible in the number and configuration of lots.

ATTACHMENTS

52151_ContextMap50k.pdf
52151_AirphotoMap20k.pdf
52151_Proposal Sketch.pdf
52151_Survey Plan.pdf
52151_Background Info.pdf

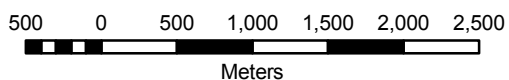
END OF REPORT

Prepared by: Liz Sutton (October 20, 2011)



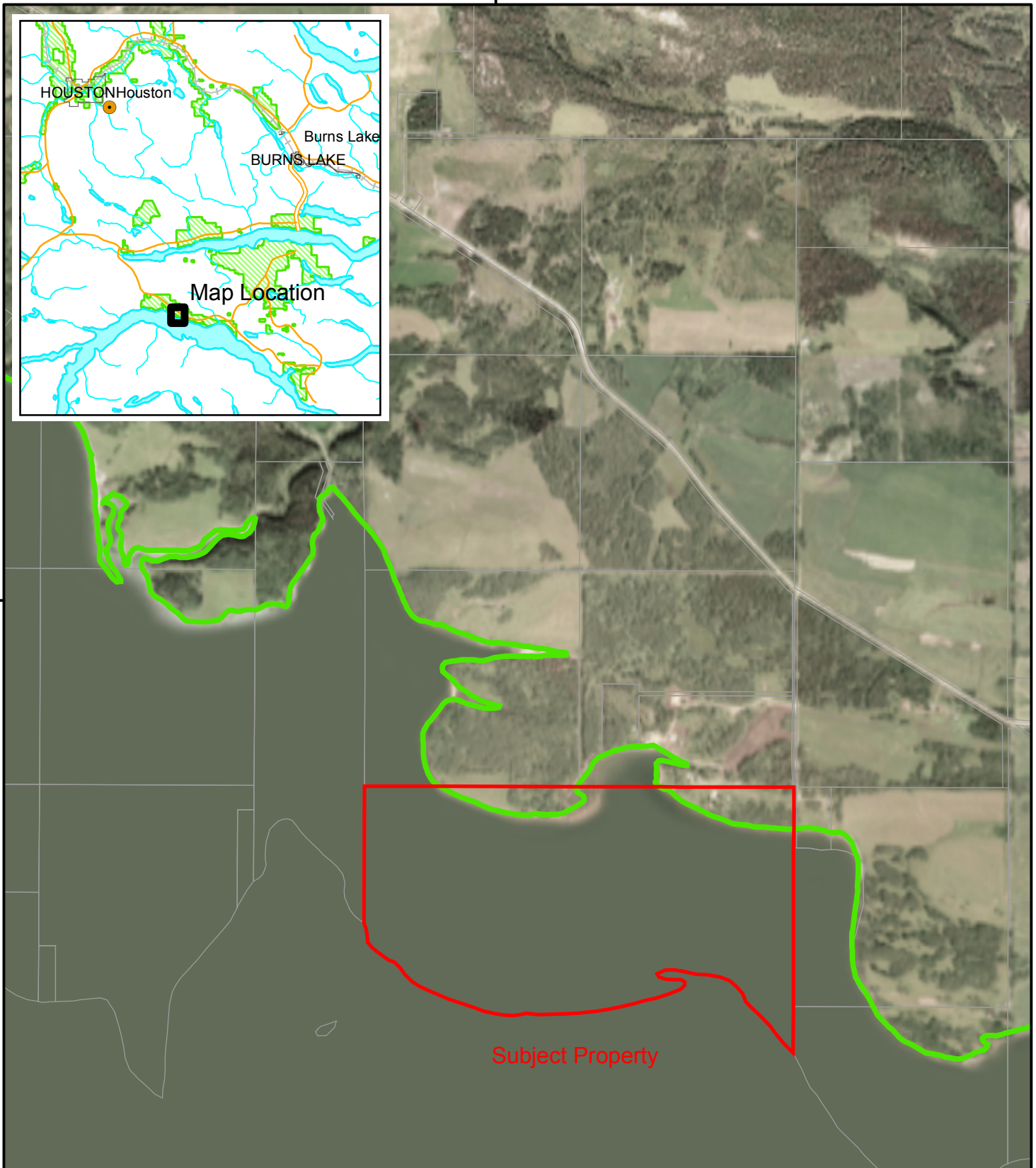
ALC Context Map

Map Scale: 1:50,000



ALC File #:	52151
Mapsheet #:	93E.089
Map Produced:	Feb 10, 2011
Regional District:	Bulkley-Nechako

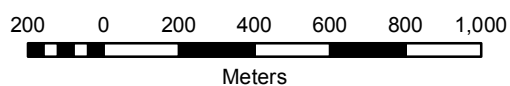
126°16'0"W



Airphoto Map

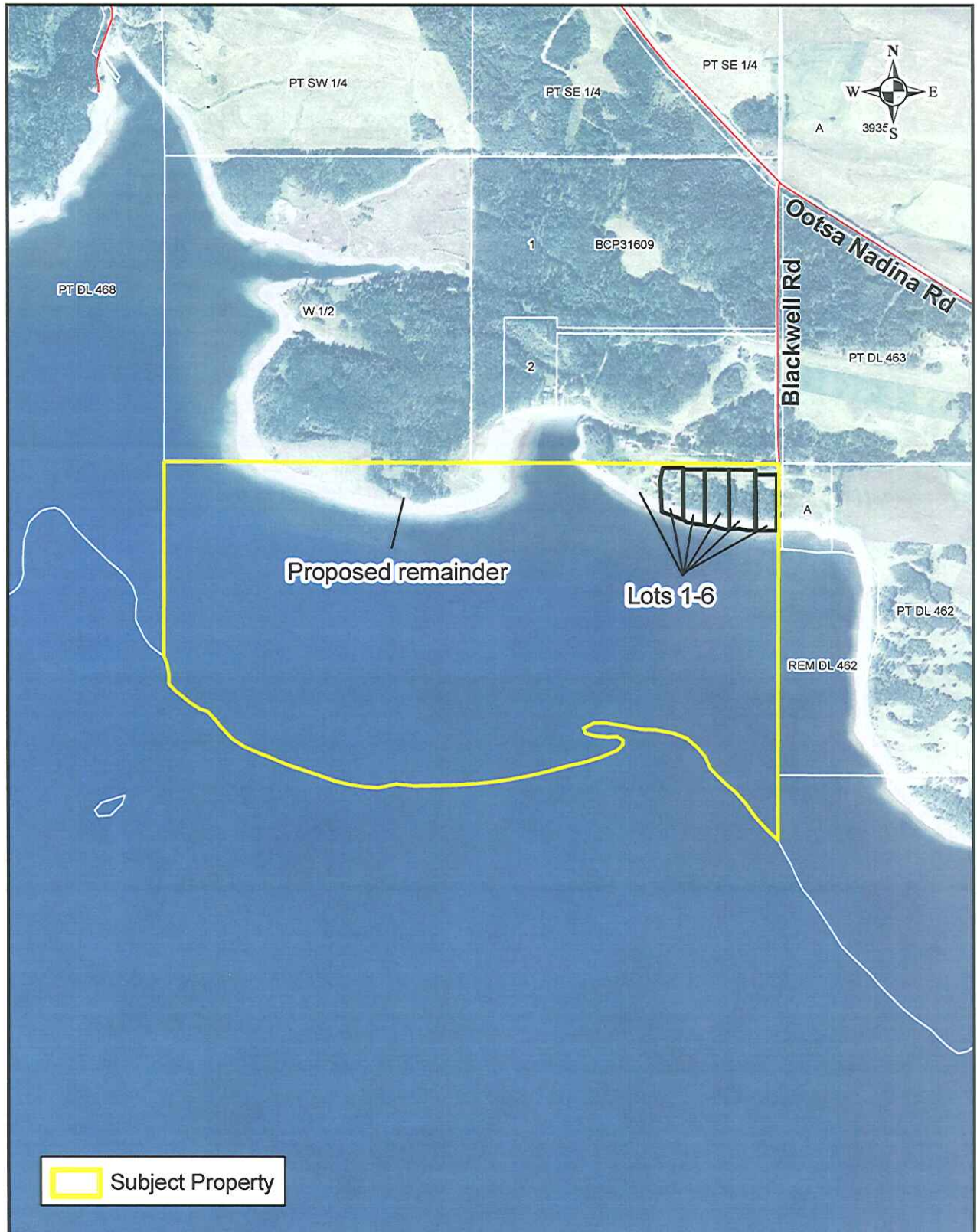
Provincial Orthophoto 2006

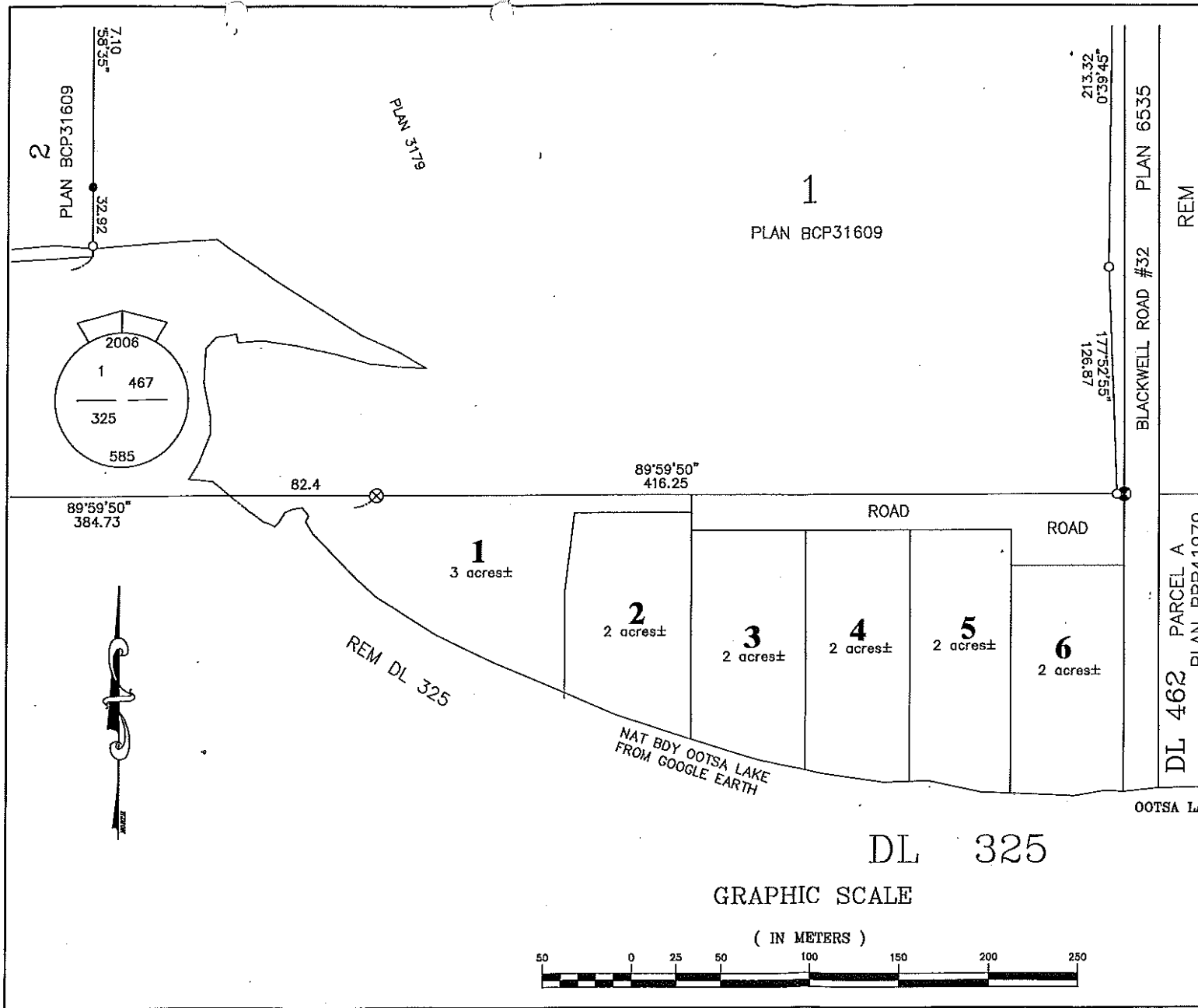
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Specific Location





Reasons why DL 325 in Wistaria B.C. is not suitable for agricultural use and should be considered for subdivision into residential lots.

- 1 The economy of the Lakes District rests mainly on the forest and tourist industries while farming and ranching decline due to unsatisfactory financial returns.
- 2 An increasing number of people from Canada and other parts of the world are presently buying rural property - especially waterfront – in British Columbia for recreational and residential use. This growing demand is being met by fewer and fewer smaller land parcels. Most of the available rural lands being offered for sale today are larger properties contained within the ALR. Consequently, many buyers who would prefer smaller pieces of land are forced to purchase these larger agricultural properties and under-utilize them for their private purposes, thus driving prices and taxes for agricultural land up and the available agricultural land acreages down.

Higher investment and taxation costs to the rancher in purchasing more land as a result of less availability makes ranching operations less profitable and therefore less attractive to surrounding ranchers and farmers.

Allowing subdivision of DL325, which is unsuitable for agricultural use as shown below, would make several smaller properties available while taking some of the pressure off the larger parcels that are more conducive to ranching and farming.

The Lakes District would also benefit from more residents who provide a workforce, purchase goods and services, and add to the local tax rolls.

- 1 The size and shape of the property in question make it impractical for today's agricultural use for the following reasons:

DL325 consists of two parts naturally subdivided by a bay after the flooding of Ootsa Lake in the 1950's. Today, the remaining acreage of the originally large DL325 is approximately 23 acres. Both parts are very narrow and stretch along the lake shore with the west piece being approximately 10 acres and no wider than 90 meters, while the east part is approximately 13 acres and no wider than 130 meters.

Use of Eastern portion of DL325 for grazing livestock is not suitable because the narrow stretch of land slopes towards the lake. Animal waste would eventually pollute the lake and affect the drinking water intakes of the neighbouring properties to the east and west as well as residences on DL325 itself. Given the slope, clearing the property of existing trees would lead to potential erosion of what soil there is. In addition, the steep bank of the lake would put cattle to risk of injury or death trying to get to the water.

The western ½ portion of DL325 is not used at all since it has no legal road access, leaving it with water access only.

The agricultural capability of the property, based on Canada Land Inventory mapping, is for 60% of the subject property class 5 land limited by topography and for 40% of the subject property class 4 land limited by adverse climate.

The property was purchased by the present owner in 2006. Since then it has been used for recreation and residential purposes. Before that, the property was owned by a US couple for their residence for over a 25 year period.

Hans Buch
54075 Ootsa Lake Rd E Burns Lake B.C. V0J 1E4 Canada
PH/FAX: 1-250-694-3417 e-mail: Hans@canada-farm-ranch.com

August 08, 2011

Regional District of Bulkley-Nechako
37 - 3rd Avenue,
PO Box 820,
Burns Lake B.C. V0J 1E0

By email to Maria Sandberg <maria.sandberg@rdbn.bc.ca>

Attention: Maria Sandberg

Re: Proposed Subdivision Wisteria, District Lot 325, RD File 1100

Dear Maria,

I submit this as a request for reconsideration of my subdivision application for the following reasons:

With their letter dated May 20, 2011, W.D. McIntosh Land Surveying Ltd., informed you that:

- they will no longer be my agent anymore and that I will personally represent my application.
- that they did not give me timely notification of meetings of the Regional District (RD) Board or Advisory Planning Commission's (APC) meetings and did not provide me information of the content of the original RD staff report to the APC and RD Board prior to the APC and RD Board meetings.
- that as a result of their lack of information I did not have the opportunity to prepare a response to negative comments of the RD staff when I attended the APC meeting, which, by the way, I only found out by accident (for the same reasons I also did not have the opportunity to attend the RD Board meeting).

W.D. McIntosh Land Surveying Ltd., also informed you of my requests:

- to ask the Agricultural Land Commission to put my application on hold and,
- to ask the Regional District to reconsider my application after I submitted additional information for their consideration.

As advised by W.D. McIntosh Land Surveying Ltd., I am hereby providing you with my comments and additional information for your consideration, as well as a copy being forwarded to the Agricultural Land Commission for their information.

The Comments of the Regional District in their attached 'Area E Board Report re meeting Nov 25. 2010' to the Regional District Board of Directors appear to have been the basis for the Board's negative decision on my application to subdivide my property in Wisteria B.C.

It seems to me that the rationale the RDBN used in considering my application for a subdivision in the ALR was not applicable to my situation. This same rationale, on the other hand, was not applied in the RDBN's approval of the Mund subdivision application for land outside the ALR in 2010 (see details below). Now I am concerned that the Board's negative decision could have a strong and unfair influence on the ALC's final decision on my subdivision application. For this reason, my following comments will mainly focus on the attached RDBN 'Area E Board Report re meeting Nov 25, 2010' to the Regional District Board of Directors, on the Mund rezoning and subdivision case on Francois Lake, and to point out the contradictions I see compared to my case on Ootsa Lake.

1. Ministry of Agriculture and Lands

The above Ministry does not support my application for the following two reasons:

a. "The smaller lot sizes proposed will limit the agricultural options ..."

In my opinion, this statement is not applicable because my land is neither capable nor suitable for agriculture use in general. Both parts of DL 325 are very narrow and stretch along the lake shore while the east part of the land slopes towards the lake, presenting the risk of polluting the lake and the drinking water supply for my property and adjacent homes. Clearing the property of existing trees, which cover most of the east part, would lead to potential erosion of what soil there is. Also, the steep bank down to the lake puts animals at risk of injury or death trying to get to drinking water. Following the flooding of Ootsa Lake back in the 1950's by Alcan Aluminum Company of Canada, the major portion of DL 325 was swallowed up by Alcan's new reservoir leaving two narrow properties separated by water. The eastern portion of the property has been used mainly for residential to this day. The two long narrow stretches of property along the lake have been providing a buffer zone for water pollution control between the lake and the ranch land that lies immediately to the north.

b. "The addition of many small lots in the area increases the possibility of future conflict with surrounding agriculture."

In my opinion, this argument is also not realistic. Considering the size of Wisteria where there are mostly large pieces of ranch land and no other subdivisions creating smaller lots, a total of seven lots cannot be considered as "many". My land is already divided by a bay thanks to Alcan's flooding of Ootsa Lake. My requested subdivision of the east part would provide for only five additional building lots while the west part would remain at its present size as a landlocked field of 10 acres. Therefore, talking about an "addition of many small lots" creates a wrong impression to the reader.

(Also see 7. below; A comparison to the 'Mund Subdivision' on Francois Lake)

I don't understand how my proposed subdivision would result in "... the possibility of future conflict with surrounding agriculture." Lots within my subdivision would have access from the existing public road that runs from the highway down to a public easement to the lake. During a meeting with the Advisory Planning Commission, on October 19, 2010, I offered to isolate the proposed subdivision from the property to the north and from the public access road to the lake by installing suitable fencing along with an approved cattle guard. Ranchlands in the surrounding area are already fenced barring unauthorized access. The main interests of potential subdivision residents would be mainly recreational use of the lake and surrounding wilderness. Each lot would have its own direct lake access.

2. Advisory Planning Commission and Planning Department

The Advisory Planning Commission appears to have the same basic concerns as the Ministry of Agriculture and Lands, which I addressed above. They recommend the creation of an, “Official Community Plan for the southside of Francois Lake.” And yet the Planning Department states; “The area has a very limited amount of residential development and the land use is dominated by agriculture, forestry, and outdoor recreation.” As it looks, I happen to own one of these very few residential properties in Wisteria. For decades, my property has been used for residential purposes because it is neither capable nor suitable for agriculture use, again as a result of flooding in the 1950’s. Obviously, this is an ideal property for the development of a residential subdivision at this time in Wisteria with several advantages for the ranches in the area.

In this regard I want to point out that the Advisory Planning Commission, just a few months ago, recommended the approval of the Mund Subdivision comprising seven 2.5 acres lakeshore parcels in the same Electoral Area E on the southside of Francois Lake.
(see 7. below; A comparison to the ‘Mund Subdivision’ on Francois Lake)

3. Planning Department

It is correct that “the area has a very limited amount of residential development.” This is why people talk about Wisteria as a ‘dying community’. Not everybody who would like to live in Wisteria wishes or can effort to buy a large piece of land. Besides, such land is very seldom available.

The very limited amount of residential development in Wisteria is, on my opinion, not a denying factor against my application, but rather a good reason to approve my subdivision of land. The fact that the property is not capable or suitable for agriculture presents a real opportunity for the area to attract a few more families to live and work there.

4. “2820 line”

I do not believe the “2820 line” should be an argument against my subdivision as it appears to have been. As shown on the ‘2820 contour map’ in the attached ‘RDBN Area E Board Report re meeting Nov 25. 2010’, most of my land is above the 2820 foot mark and there is enough land for buildings and septic systems above the elevation of 2820 feet.

5. Impact on agriculture

I agree with the Regional District that, ‘the subject property has limited agricultural potential given its size and location along the lake.’ I would like to add to this, as outlined above under 1.a. that the land sloping towards the lake poses a risk of polluting the lake and drinking water supply, not to mention the resulting soil erosion should the trees, covering the major part of the land to be subdivided, be cleared, as would be needed for any attempt at agriculture. Also with the steep bank comes the danger of injury or death to animals trying to reach the water.

In addition, the attached 'RDBN Area E Board Report re meeting Nov 25. 2010', describes on page 172 the agricultural capability of the land as follows:

60% Class 5 land limited to topography capable of production of cultivated perennial forage crops with soil- and/or climate conditions that severely limit the capability of the land and

40% class 4 land limited by topography, capable of a restricted range of crops with soil and/or climate conditions that require special management considerations.

Looking at the whole picture of this land I ask myself, given the conditions described and the necessity of an economically meaningful operation, who in the world would be willing to ranch or farm this small stretch of land? Even if I would offer to lease the accessible east part of my land to a rancher in the area, who would want to add 13 acres with very limited agricultural potential to his operation of probably hundreds of acres; having to deal with the risk of polluted drinking water from the lake; the risk of animals falling down a steep bank into the lake; soil erosion and the disadvantages of class 4 and class 5 land qualities?

In this regard I should mention that the west part of my land, referred in my application as the remaining 10 acres, was hayed until I purchased the property. Since my purchase, access to that property via its northern boundary has been denied by the adjacent land owner, and therefore the land can no longer be used for agricultural purposes by myself or a lessee.

6. Land Use

I believe that all authorities involved in the decision making process about my application, need to consider the whole situation in their weighing of interests. This means to not only focus on possible theoretical disadvantages for agriculture but also on the real advantages that the subdivision has to offer to farms and ranches as well as to other businesses in the area and the community in general. After all, developments and subdivisions are a necessary key factor in economic stability and growth while they almost never fully satisfy the wishes and needs of all parties involved and affected.

An important aspect in this regard is the fact that my subdivision would make several smaller properties available to people who want to live in that area while taking some of the purchase pressure off the larger parcels that are more conducive to ranching and farming. I have observed over the last 15 years how this private purchase pressure drove prices and taxes up for agricultural properties in the whole area from Smithers B.C., to Vanderhoof B.C., while many of those purchasers would have rather bought smaller lots if available. New people in Wisteria B.C., would also provide a workforce for the ranches in the area. More families would be purchasing goods and services in the area, and adding to the local tax rolls.

7. A comparison to the 'Mund Subdivision' on Francois Lake

In 2010 the Regional District of Bulkley Nechako approved an application for re-zoning an area of Francois Lake lakeshore from RR1 (Rural Resource) to RR4 (Waterfront Residential II) known as Bylaw number 1540. It should be noted that the area included in the bylaw change is not in the ALR but is within the boundaries of Electoral Area E. The lakefront property is also surrounded by large acreages of "notable agricultural uses". It should also be noted that the owner's intention all along has been to

subdivide the property into smaller lots with one remaining 257 acre parcel. The owner also makes reference to further subdivisions at a later date.

There are several interesting similarities between the application for re-zoning on Francois Lake and my own application for subdivision on Ootsa Lake at Wisteria B.C.:

- a.** In 2010 the Advisory Planning Commission recommended to approve the 2.5 acres parcels of the Mund Subdivision (see attached 'Planning Department Report, dated February 11, 2010', page 218). In my case the Advisory Planning Commission would prefer a Community Plan be developed and in place. They are also concerned about conflicts with the surrounding agriculture use. It appears, however, they were less concerned with larger parcels (more than 2 acres).
- b.** The Planning Department Staff had some concerns with the parcel size of 2.5 acres in the Mund subdivision, but states clearly: "In isolation the proposed development will not have a significant impact." (see attached 'Planning Department Report, dated February 11, 2010', page 219, top). In my case, the Planning Department states, "... concerns regarding the development of waterfront parcels of this size given the potential for long term negative environmental, health and community character impacts." (see attached 'Area E Board Report re meeting Nov 25. 2010' page 174, Land Use). I believe that "isolation" is even a stronger supporting argument for my application because this would be the only subdivision of its kind on Ootsa Lake, while there are smaller 2 acres lots existing near the 'Mund subdivision'. The whole area around Francois Lake is more developed in general.
- c.** Another concern of the Planning Department with my application is:
"The area is characterized by larger parcels, and the introduction of smaller parcels, as proposed, would result in change to the character of the area. The local community may also have concerns regarding the proposed development of the property." (attached 'Area E Board Report re meeting Nov 25. 2010', page 174, Land Use). In the Mund case, staff asked the applicant to consider parcels larger than 2 acres or a Bare Land Strata. (see attached 'Planning Department Report, dated February 11, 2010', page 219, bottom).

According to the applicant, Mr. Mund, the recommendation of Bare Land Strata would have meant 15 lots of .5 acres and smaller with joint water treatment system. I agree with Mr. Mund where he says, "This contradicts the argument of too small a parcel size and assumes that a strata corporation would better manage waste water and reduce the amount of phosphorus release.", (see attached 'Planning Department Report, dated February 11, 2010', page 226).

In my opinion these statements indicate that the Planning Department's real concerns seem to be the effectiveness of waste water management and its possible impacts on health and environment, not the actual size of the parcels.

Regarding their argument that the "the local community may also have concerns" with my development, I notice the overwhelming concerns of the local community about the 'Mund Subdivision' did not seem to have an impact on the approval at all (see attached 'Report of the Public Hearing for Bylaw 1540, dated May 20, 2010', pages 54-69).

8. Letters of Opposition:

From the RDBN/ALC file that you sent me this year, after I found out about the Board's negative decision on November 25, 2010, I saw for the first time the 3 letters of opposition from the public.

These are my comments on the issues of those letters:

a. Letter from Julie and Gary Blackwell, dated November 23, 2010:

The Blackwells are my neighbours to the north. They address the issues of dogs and fences. I have lived in ranching areas myself for over 20 years, always surrounded by my neighbours' cattle and understand from my own experience the general importance of good fences between neighbours with animals as well as the concept of 'fencing out'.

I am committed to avoid from the beginning any interferences between animals on my subdivision and my neighbours' lands. For this reason I will build a strong mesh wire fence around the subdivision and a cattle guard on the driveway to the lots.

Based on my information, Blackwells are part time ranchers.

b. Letter from Pat Kalaman, dated November 15, 2010

Mrs. Kalaman's main concern seems to be that my property is taken off the ALR. This is not part of my application.

As my vendor told me, Mrs. Kalaman used to put up hay on the west part of DL 325. After I purchased the land in 2006, she told me, she would not be interested in haying the land anymore. Based on my information, Mrs. Kalaman is not involved in active ranching anymore.

I do not know on which part of the ranch she ever got some grain(?) crops and how long ago this would be. I assume it was the west part.

The erosion concerns are addressed below in my comments about Heather and Robert Anderson's letter.

The sewer issue will be dealt with in accordance with the applicable provisions of BC Health. Mrs. Sherry Applegate, from the Ministry of Transportation, Smithers, confirmed to me in 2010, that the Ministry of Transportation did not have problems approving lots smaller than 2.5 acres because efficient sewer systems are possible on small lots.

I did not know about the fox den and so far have not seen any sign of it. I will ask Mrs. Kalaman to show me the den. In case it still exists, I will do everything possible to protect the den because one of my principles is the protection of nature. If the den sits right above the lake shore, as Mrs. Kalaman says, it will be far below the 2820 contour and protected from buildings anyway.

c. Letter from Heather and Robert Anderson, dated November 17, 2010:

Mrs. and Mr. Anderson are addressing the erosion issue. The '2820' contour of Ootsa Lake, backed up by easements registered against the lakefront properties in favour for Alcan and Bylaws of the RDBN, does not allow buildings within 2820 feet elevation. Most of my land

provides for sufficient space for buildings and septic systems above the elevation of 2820 feet (see page 179 of the attached 'Area E Board Report re meeting Nov 25. 2010').

The Andersons also address the issue of inflating land values. As I outlined above under 6., it was, in contrast to their concerns, rather a lack of smaller properties for sale that inflated the values and taxes of agricultural lands in surrounding communities. Private buyers had to buy larger agricultural lots for their private purposes. In fact, my subdivision would support the Anderson's interest to keep values and taxes for their and other ranch land in Wisteria down.

The Anderson's concerns regarding fences and the "Open Range Policy" were addressed above in my comments to Blackwell's letter.

Based on my information, Andersons are not active ranchers but lease their land to a local rancher. From what I know, their lessee, who runs on my opinion the largest ranch operation in the area, has no concerns about my subdivision.

9. In Conclusion

After carefully looking at the Regional District of Bulkley Nechako concerns and comments regarding the 'Mund Subdivision' and comparing them to the Regional District's concerns about my subdivision application, I am a little disturbed. I'm surprised the RD didn't suggest an increase in parcel size to say, 2.5 acres, and to prove evidence that an effective waste water management would be provided.

With respect to the Mund Subdivision, the Planning Department also said:

"Planning staff would prefer to see the parcels developed in this area to a larger size. However, it is recognized that this applicant has developed similar size subdivisions in this area in the past and had an expectation that he could continue developing in a similar manner. It is noted that there is no Official Community Plan in place providing policy direction to property owners regarding development in the area. Therefore staff agreed to support the proposed rezoning ..." (see attached 'Planning Department Report, dated February 11, 2010', page 220, bottom).

I would hope this statement could be applied in my favor as well in the Regional District's recommendation to the Agricultural Land Commission.

As outlined above, the Regional District Board of Directors knew nothing of my opinion about the RDBN staff's findings because I did not have a chance to present my arguments, now outlined in this letter, before the Board prior to their decision to oppose my application.

I am well aware that the ALC is the final deciding authority over my application. Nevertheless, one main reason for this letter is to prove that if the ALC goes along with my application, the proposed subdivision would not be in contradiction with the Regional District's principals and deciding factors as applied in the comparable Mund Subdivision.

In support of a positive decision by the RD Board of Directors and the ALC and to avoid an additional time-consuming zoning procedure as wanted by the Regional District, I would, if necessary, also offer to negotiate an increase of my new lot sizes on the east part of DL 325 while the west part would stay at 10 acres with water access as a remainder of DL 325.

For the reasons, presented in the beginning of this letter, I hereby ask the Regional District to reconsider my application.

Respectfully,

Hans Buch

#52151



#52151





#52151



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