

Written Submission to the Parks, Environment, and Climate Action Advisory Committee (PECAAC)

Re: RZ-2026-0014, 620 Laura Road (proposed cidery rezoning)

For: PECAAC consideration, meeting of 7 July 2026

To: Parks, Environment, and Climate Action Advisory Committee

c/o: the Committee Clerk,

From: Heather Miller

Date: 29 June 2026

Members of the Committee,

I am writing about the proposed rezoning at 620 Laura Road, which Council referred to your Committee on 13 April 2026. I lived downstream of this property on Bowen Island for thirty-three years, from 1990 to 2023, and have followed and engaged with this matter through every avenue open to me since 2021. I am closely familiar with the record set out below, and I have kept the points to the parts of this application that fall within your Committee's work.

Those matters fall within the Committee's Terms of Reference, which name water quality, biodiversity and ecosystem health, water conservation, and cumulative impacts among its concerns, and which task it with reviewing the environmental requirements for new development referred to it by Council. That is the lens I am asking the Committee to apply.

I rely on my fuller submissions in this matter, which I attach rather than repeat here, and I draw out below only the environmental matters that fall within this Committee's mandate.

The rezoning rests, in substance, on two things: the temporary use permit and Vancouver Coastal Health's oversight of the water system. My 15 June submission examines both in detail, and I will not repeat that here.

A brief note on one recent event, so there is no confusion. Two days after I sent my submission to Council, Vancouver Coastal Health attended the property and rescinded the water quality advisory it had issued on 28 May. On the surface that might look as though it answered the concerns I raised; on the substance, reading the inspection itself, it does not. The advisory was lifted at the point a new chlorinator had been installed and was producing chlorine, not on any demonstrated record of stable, verifiable operation; on the day of the rescission the system was over-chlorinating, the test kit still carried reagent expired in 2024, and the treatment-chain inconsistency identified earlier is not recorded as resolved. A momentary fix was again treated as an answer to a question that has not actually been examined, which is the same pattern this submission, and the Committee's own environmental remit, are concerned with.

I make no more of it than that, because I am not drawing conclusions ahead of the records. Formal records requests are underway, including Freedom of Information requests with Vancouver Coastal Health and with the Municipality, and questions to the Islands Trust, seeking the documented basis for two things: why the environmental, groundwater and wastewater assessments this submission identifies were never required or carried out; and how this approval pathway as a whole, the original temporary use permit, its renewal, and now the rezoning, was constituted at each stage. Other Provincial layers, including the Ministry of Water, Land and Resource Stewardship, are engaged and are now also the subject of requests. Until those records are in hand I will not characterise them. I

mention the 17 June inspection only so the rescission is not mistaken for a resolution. I will continue to bring what these records show to the Municipality's attention as the work progresses. Whatever is decided here, that record should be complete and available, both so that this decision rests on it, and because these questions reach beyond this application.

1. The environmental requirements are not met on the current record

The record before the Committee does not yet show the environmental protections in place that this application would need. In particular, it does not show:

- a defined and adequately sized streamside protection and enhancement area (SPEA), with a proper riparian buffer;
- a secured, lasting way to protect the riparian area, by covenant or parkland dedication, rather than a stated intention;
- a credible plan for handling the site's wastewater, including what the application describes as "greywater," so that it does not reach the riparian area or the groundwater; and
- an assessment against the Conservation Development Policy.

I ask the Committee to advise Council that, on the record as it stands, these environmental requirements are not met.

2. The Committee has already set the standard, next door

This is not an abstract test. For the neighbouring property at 1355 Westside Road (OCP/RZ-2025-0113), the Committee passed a unanimous recommendation on 4 February 2026. That recommendation included:

- protecting the riparian and stream area by restrictive covenant or parkland dedication;
- a larger SPEA buffer;
- environmental monitoring during construction;
- measures to prevent the disposal of waste into the riparian area; and
- keeping half of the property in conservation, under the Conservation Development Policy.

620 Laura Road sits nearby, draws on and drains to the same groundwater and surface water, and raises the same risks. I ask the Committee to apply the standard it set next door, consistently, to this application.

3. The wetland this property drains into is the feature this Committee protected next door

The surface water from 620 Laura Road runs down Murray Creek into the wetland complex immediately below 1355 Westside Road. That wetland is mapped as a sensitive ecosystem in Metro Vancouver's Sensitive Ecosystem Inventory, it appears in more than one mapping program, and it is identified as a groundwater recharge zone for the aquifers that supply this part of the island.

The protection of this wetland and the riparian system was a stated concern when this Committee considered the neighbouring applications. For 1355 Westside Road, the recommendation was for riparian and stream protection. For Lot 7 Adams Road, the Committee looked for assurance from qualified professionals that the groundwater recharge area would not be harmed, that the wetlands

would be protected, and that the Grafton Lake watershed would not be contaminated. No equivalent wetland or riparian assessment has been required for 620 Laura Road, the property whose creek flows into that wetland.

4. Other applications came with environmental evidence. This one has not.

When the Committee considered 1355 Westside Road, the record before it included a groundwater assessment (whatever its merits, an assessment was at least required and filed), and the Committee was able to recommend covenant or parkland protection on that basis. Other rezoning applications on this part of the island have likewise come forward with environmental assessments, well or groundwater reports, and covenant or parkland protections.

The record for 620 Laura Road contains none of these. Through both the temporary use permit and this rezoning, no environmental assessment, no well or groundwater report, and no secured covenant protection has been placed before the Committee. The Committee is being asked to support a permanent approval on a thinner environmental record than it required for the property next door, on the same groundwater and watershed.

These are not gaps to be filled by assurances offered outside the process, or by material that arrives late and is not open to the same scrutiny. The place to answer them is the application itself: the published application package and the staff report on which the public, this Committee, and Council are entitled to rely. If these environmental questions are to be met, the application should be revised and reviewed so that the answers sit in the public record, where they can be seen and tested, before any permanent decision is made. A decision that rests on what is not in that record is not one the public has been able to consult on. On a matter of this kind, the public interest lies not only in being able to comment, but in having a properly informed application on which to comment.

5. The rezoning sets no limit on production, or on the risk to Bowen

There is one feature of this application that bears directly on the scale of what would be permitted, and it is easily missed. This is not a new proposal: the same definition has governed the operation throughout its temporary use permit, and the applicants now ask that it be rolled over, unexamined, into permanent zoning.

Once rezoned, there is no limit on how much cider can be made here, and not one apple of it need be grown on Bowen. The definition the applicants carry forward requires only that a quarter of the cider come from “the same lot, or from another lot which is part of the same business,” and the applicants’ business already leases an orchard in the Similkameen; that leased orchard can supply the whole of the required quarter, and the rest may be imported. So the orchard and the production can sit off-island, while the water drawn and the light-industrial effluent produced, and the risk it carries to groundwater, stay here, in this watershed. The rezoning fixes that to the land permanently, for any owner, who could lease an orchard of any size, anywhere in British Columbia, and supply this site accordingly. There is, in effect, no ceiling on production, and none on the waste it generates. In five years it has never been examined, and it is now about to become permanent.

Nor is this only a question about one property. The draft Official Community Plan would newly admit “agricultural processing” as a supported use across Rural Residential land without defining it or limiting its scale; a permanent approval here, on this definition, would set the working template for that use island-wide: the same uncapped production, the same risk to the same kind of shared

aquifer, wherever it is next invoked. I have put this point to the Official Community Plan update directly.

I have brought these matters forward at each stage at which they could be raised, at the temporary use permit, at its renewal, and now, and I raise them again here, while a permanent decision is still open, so that it cannot later be said the questions were never put.

6. The three applications on this part of the island should be looked at together

Three rezoning applications are currently live on neighbouring properties in this part of the island: 620 Laura Road (RZ-2026-0014), 1355 Westside Road (OCP/RZ-2025-0113), and Lot 7 Adams Road (RZ-2025-0015). They are being handled separately, each on its own file.

These properties share the same local groundwater and watershed, and the way the three have been handled is itself telling. For Lot 7 Adams Road, the Advisory Planning Commission reserved support pending hydrogeological testing and watershed protection; for 1355 Westside Road, it recommended deferral until the Official Community Plan update and the Grafton Lake Watershed Management Plan are complete, and Council deferred on that basis. The Advisory Planning Commission also recommended that the Official Community Plan consider whether there should be limits on the types or intensity of development allowed in watershed areas island-wide, “not just on a case-by-case basis.”

620 Laura Road is different from the other two in a way that matters here: the neighbouring applications are residential, while the cidery is a commercial operation producing light-industrial process effluent, a higher-organic-load, lower-pH stream than domestic wastewater, and it sits upstream of both, in the same watershed and the same Watershed, Aquifer and Stream Protection Development Permit Area. It is nonetheless the application being advanced without the scrutiny the other two received. The combined effect of the three on this shared system is the kind of question that only comes into view when they are considered together, and it falls squarely within this Committee’s environmental remit, which names cumulative impacts among its concerns.

I attach two documents that set this out more fully than I can here: a table laying side by side what each of the three applications filed, the scrutiny each received, and how each is being handled; and a report on the watershed itself: the mapped sensitive ecosystems, the Watershed, Aquifer and Stream Protection Development Permit Area, the well density, and the groundwater conditions across the three properties. The contrast, and the sensitivity of the ground it plays out on, are easier to see laid out than described.

What I am asking, in short

That the Committee advise Council:

1. the environmental requirements for 620 Laura Road are not met by the application as it stands, which does not include environmental assessment, groundwater or well reporting as filed for comparable applications nearby;
2. this application should be held to the same riparian, wetland, waste-handling and conservation standard the Committee recommended for the neighbouring applications in this watershed; and
3. the application should be assessed for its combined effect on the groundwater and watershed alongside the two neighbouring applications, not on its own; and

4. the environmental questions raised here should be answered within the application record itself, with the application package and staff report revised and reviewed accordingly, rather than through assurances outside that process, so that any permanent decision rests on a complete public record.

If the Committee does visit the site, as it has for comparable applications nearby, the attached note sets out what the application materials do not show about the water on this property: the course of Murray Creek, the registered wastewater system, and the features a visit might bring into view. That a site visit may be the first occasion any of this is examined is itself part of what the note records.

The supporting submissions have been attached with this letter, all via a single email sent to your committee mailbox, June 29, 2026.

Yours sincerely,

Heather Miller

Attachments: (1) Submission to Council, 15 June 2026; (2) Three related rezoning applications: a comparison; (3) Aquifer, groundwater and watershed evidence (the watershed mapping, the Watershed, Aquifer and Stream Protection Development Permit Area, well density, wetland and groundwater conditions); (4) A note on current site plan and potential site visit.