



May 6, 2008

Honourable Ida Chong,
Minister of Community Services
PO BOX 9056, STN PROV GOVT.
Victoria, BC V8W9E2

Dear Minister Chong:

Smart Growth BC wishes to commend you for the tabling of Bill 27, the Local Government (Green Communities) Statutes Amendment Act, 2008. This Bill is an excellent step towards climate protection, and many of the tools will assist local governments in addressing energy and greenhouse gas emissions. We are particularly pleased that the Bill has addressed a number of the issues we have raised in previous correspondence with the Province. We look forward to working with your ministry as well as with local governments on implementing these new provisions.

We also have some specific comments and recommendations to offer:

Parking Space Requirements

We applaud the amendment to the Community Charter that allows local government payment in lieu of providing parking spaces to now be applied to transportation infrastructure that supports walking, bicycling, public transit or other alternative forms of transportation. This funding will help to give citizens the transportation options they need, and begin to better balance the financing of the infrastructure of transportation.

Development Cost Charges (DCCs)

The exemption of paying development cost charges for residential units no larger than 29 square metres will encourage construction of more and smaller, affordable homes such as laneway housing, which Smart Growth BC strongly supports. The ability for local governments to waive or reduce DCCs for affordable housing, reduced GHGs and low environmental impact developments is a strong tool to encourage more sustainable development. We encourage your ministry to support local governments in developing a framework for sustainable development by which projects can be exempted. This framework must tie into Official Community Plans in order to link land use strategies with energy reduction and affordable housing strategies. The objective of offering DCC reductions should be to encourage highly efficient buildings, including affordable housing, located

in compact communities where the public costs of providing infrastructure are lower and where transportation options including public transit are feasible. In addition, tying a reduced DCC structure to the Province's Brownfield Renewal Strategy would encourage development in key urban areas, which would also help meet other energy and affordable housing objectives.

Development Permit Areas (DPAs)

Expanding the requirements for Development Permit Areas to include energy and water conservation and reduction of greenhouse gases is an excellent way to encourage better development on land already zoned for development. However, the question of what qualifies as special conditions for the municipality to require the DPA for these objectives needs to be answered.

Official Community Plans (OCPs)

Bill 27's requirement that Official Community Plans must include targets for the reduction of greenhouse gas emissions, with proposed Council policies and actions, is a progressive and essential step in addressing the land use impacts on GHGs. Its failing is that, without a mechanism to ensure that those targets be met, it is uncertain how the actual results will be achieved.

Regional Growth Strategies (RGS)

Smart Growth BC submits that a Regional Growth Strategy is one of the most potentially effective tools that local governments have in regulating land use, growth management and regional planning, and we encourage the Provincial Government to strengthen the requirements for the development and adherence of RGS in each regional district. In the preparation of an RGS, we submit that making consultation with affected parties an option instead of a requirement, as proposed in Bill 27, is a step backwards, and respectfully urge that this provision be dropped. We strongly support the requirement that Regional Growth Strategies must have greenhouse gas targets, but again question the lack of accountability.

Once again, we applaud your ministry and the Provincial government in tabling this Bill, and urge you to consider the recommendations we have submitted. We congratulate your ministry for all its important work with local governments and for leading North America in recognizing and addressing the need for effective actions against climate change.

Thank you for your attention to this letter.

Sincerely yours,



Cheeying Ho
Executive Director

Copy: Premier Gordon Campbell
Deputy Minister of Community Services, Dale Wall