

*KSAN's Review
Of
Kelowna's Draft 2040 OCP*

March 12, 2021

KSAN's Review of the Draft 2040

Introduction

The Kelowna South Central Association of Neighbourhoods (KSAN) is located roughly between the downtown area and Pandosy and areas south, and from the lake to as far east as Burtch Road (Figure 1). The KSAN area is affected by traffic and people from the north, the south, the east, and from the West Kelowna area as they all pass through our central location to go to other areas. Therefore, the draft 2040 OCP is of great interest to KSAN as the policies and plan will affect the livability and sustainability of the KSAN area. As well, many aspects of the OCP affect all citizens, such as climate change effects, transportation, consultation, food security, institutions such as Kelowna General Hospital, densification, and affordability. The KSAN Board has therefore reviewed the draft 2040 OCP generally and in some cases specifically, though it is not a thorough review of the whole document due to its size and complexity as it is currently not hyperlinked.



Figure 1. The KSAN area.

As a broad statement, the KSAN Board does find the document generally well done but our concern such as with many citizens of Kelowna, is that the OCP polices may not be followed. One of the 10 pillars

of the 2040 OCP is the protection of agricultural land and yet even as recently as noted in the Daily Courier of March 6, 2021, the Planning Department supported the use of agricultural land for the expansion of a non-agricultural use (a school at Benvoulin Road). These kinds of supports for non-conforming projects that are contrary to this proposed OCP suggests that for whatever reason, even though this is a new OCP, it will not be followed.

The following are our comments and areas where the KSAN Board recommends revisions to improve the draft 2040 OCP. Please feel free to reach out to Susan Ames, KSAN President at s.ames@telus.net if you require clarification on any parts of this document or if you would benefit from any other input from the KSAN Board.

Densification

The City is projecting an increase in population (Map 2.2, Page 29) and has planned it to reduce urban sprawl. The City's proposed 2040 OCP response to an increase in population is to permit no additional growth in these outlying/hillside communities. *KSAN supports this.*

Currently up-zoning is increasing density in the KSAN area but not in a balanced way. Up-zoning is resulting in an increase in real estate prices as homes have now become a commodity. High density RU7 zoning on single family lots is resulting in the loss of green space as much of the lot is paved over or used for parking (Photo 1). The loss of setbacks and green space is reducing the sustainability of the KSAN area and the City in general.



Photo 1. RU 7 zoning resulting in loss of greenspace (Cadder Street).

The costs of the individual RU7 units are generally higher than the original cost of the single home and lot and are decreasing affordability. The costs of homes that can be zoned RU7 have increased substantially as such homes are destined for demolition and replacement with four high priced units. For

example, a single-family home lot (883 Sutherland Avenue) where the house has been removed (Photo 2) is asking \$1,500,000 (March 07, 2021).

The Description for this property on MLS states:

“RU7 ZONING! Development Permit issued for a unique corner lot 4 unit townhome Development on the Ethel St bike corridor, Back Lane! Downtown Development Property, Lot 0.187 acre (50 ft x 136 ft).”



Photo 2. Single family lot asking \$1,500,000 (March 2021).

The KSAN Board recommends that the city pause on these zonings until they can carry out a complete review of the impacts of the RU7 zoning.

KSAN is opposed to any plans to four-lane Pandosy and Richter, which would irreparably harm our peaceful enjoyment of our property, our environment, our thriving local businesses, and our quality of life. Moreover, this would not achieve the City’s goals of affordability and livability and countering climate change. We suggest that a less impactful, more affordable and sustainable option would be to instead allow more infill and densification of the neighbourhoods but limiting the surface coverage. We generally support low rise to four storey apartment buildings along the Pandosy transit corridor (exclusive of the Heritage Conservation Areas) which will reduce the impact of loss of views compared to taller buildings. *KSAN supports the adoption of design guidelines to fit the neighborhoods.*

KGH & Institutional Projections

Kelowna General Hospital (KGH) is required for a growing community. KSAN understands that IH is a Provincial jurisdiction. However, the KGH precinct as Council knows, is pushing out long-standing KSAN

residents, which is something KSAN cannot support, as this attacks our neighbors, increases traffic and parking intrusion, and our quality of life.

The KSAN Board is very concerned about Objective 5.6 (Page 71):

“Support the strategic and planned growth of the Kelowna General Hospital campus as the region’s most critical health facility.”

KGH is already too large for a residential neighbourhood. It has been compared to a factory along the lake front (Photo 3).



Photo 3. KGH expansion into the KSAN area.

KSAN suggests that a more convenient approach for all of Kelowna’s residents that would address KSAN’s concerns would be a more system-based approach that KSAN is seeking from the City including:

- Decentralize – promoting the building of more satellite urgent care centers in locations such as in Rutland, Capri Mall, West Kelowna, etc. This would stop the ongoing KGH expansion and intrusion into our residential neighbourhoods.
- H-Pass - a traffic study done a decade ago suggested several innovative ways to promote active transport of staff to work to reduce staff traffic through our neighbourhoods or the demolition of homes for parking lots. In particular, KSAN supports the notion of all staff getting an H-Pass to

reduce traffic and parking demand, which spillover into our quiet roads and result in the demolition of homes for parking.

- Pay Parking - We understand that there is a 9- year waiting list for KGH staff to get parking at approximately \$1/day. This could be priced to a more modern rate which would promote and pay for the staff H-Pass and reduce the request for more staff parking facilities.
- The City has designated neighbourhoods as Health District which has resulted in residential homes being demolished for parking and hospital buildings such as on Speer St. This spread of the Health District boundary into our neighbourhoods has caused inflated costs to housing as speculation has increased and up-zoning has been allowed by the City. KSAN does not want to lose any more neighbourhoods to KGH or to speculation related to KGH.
- HD3 Transition Zone –reverse the recent decision to allow multi-family housing in this zone as this violates the process and agreement made with neighboring residents, KSAN, FRAHCAS, KGH and the City; the original HD3 zoning should be implemented.

Heritage Overview

Heritage is covered in Chapters 3 (Future Land Use), Chapter 5 (The Core Area), Chapter 11 (Heritage), and Chapter 23 (Heritage Conservation Area Development Permit Area). KSAN requests that a reference be made in the opening paragraph of Chapter 11 (Heritage) to Chapter 23 (Heritage Conservation Area Development Permit Area). Although it is recognized that the OCP is laid out to separate out Permit Areas, the public does not always recognize the inuendo of permit areas so it will not be expecting Heritage Conservation Areas (HCAs) to have a separate chapter. They will stop at Chapter 11 and think that is all there is concerning heritage unless they are alerted to Chapter 23.

The following are more specific revision requests/concerns related to heritage.

Chapter 3 – Future Land Use

Page 4. Map 3.1- Future Land Use Map

Heritage Conservation Areas (HCAs) are designated as Core Area Neighbourhood (C-NHD) in this draft OCP. This is a new designation for the City and for the HCAs. This designation allows:

- four-plexes
- row housing
- small scale commercial and complementary uses
- small lots
- low rise apartment housing and mixed use along transit supportive corridors

This designation of C-NHD will threaten the existence of the HCAs. Heritage, as defined by the standards and guidelines for the conservation of historic places in Canada, cannot be replaced as it has been previously constructed.

Remove the HCAs from Core Area Neighbourhood and return the HCAs to single/two unit residential or as HCA (single/two unit residential).

Page 32. Core Area Neighbourhood (C-NHD) Growth Strategy

The following statement under “Growth Strategy Role” is a concern to the KSAN Board as it has loose wording including “largely” and “particularly”:

“Except where located along a Transit Supportive Corridor, new development would be *largely* in keeping with the existing scale and building orientation of the neighbourhood to maintain the overall feel, *particularly in Heritage Conservation Areas.*”

This implies that new development may or may not be in keeping with existing scale and building orientation in the HCAs. Assuming that the HCA is removed from the CORE area, then please remove reference to HCAs from this paragraph.

KSAN agrees that new development such as carriage houses should be in keeping with the existing scale and building orientation in the HCAs to maintain the overall feel of the HCAs.

Page 32. Core Area Neighbourhood Summary Table:

Under the column head “Other Characteristics” in this table, the characteristic “Sensitivity to Heritage Conservation Areas” is a concern. Sensitivity is a loose word and has no firm meaning. Presuming the HCA is removed from the CORE area, remove “Sensitivity to Heritage Conservation Areas” from this table. The HCAs should **not** be referenced in this table nor as this designation (C-NHD).

Chapter 5: The Core Area

Page 69. Policy 5.3.6: “Respect the Heritage Conservation Area.”

Under this policy, KSAN has very serious concerns about the loose wording italicised in the following paragraph:

“Consider *limited* opportunities for infill, such as carriage homes, second homes, *subdivisions*, *the conversion of existing detached homes into suites*, and *new multiple housing* where such developments maintain the appearance of a single detached homes in a manner consistent with the Abbott Street and Marshall Street Heritage Conservation Areas Development Permit Guidelines. *Discourage larger infill projects where lot consolidations are required.*”

This whole paragraph is all about replacement and re-development of the HCAs. Words such as “consider limited opportunities” and “discourage” are words that allow for the replacement of the HCAs and violates the City’s own Heritage Plan Policy. The HCAs should not be part of the Core Area Neighbourhood and not be part of this Chapter 5. Policy 5.3.6 should be removed.

Chapter 11: Heritage

Page 115. Proposed New Policy 11.1.5

The KSAN Board recommends a new policy related to demolition:

Demolition Strategy. Conserve buildings in the Heritage Conservation Areas (HCAs) and on the Heritage Register by placing a value on demolition permits, based on construction replacement cost of wood windows, roof in good condition, wood floors, and other parts deemed of significant heritage value.” As a general demolition policy, value should be on replacement value of parts of a house in good condition rather than giving them a value of \$0 which is the current city policy. This will give value to the embedded energy of the building and encourage re-use and salvage. If it will cost to demolish a liveable heritage house, or any home, there will be less incentive to demolish it. Furthermore, strengthen enforcement on the current policy that “A demolition permit shall not be issued prior to the approval of a HAP and Building Permit, to properly comply with clause 605 (1) of the Local Government Act.” The current regulations are not being followed.

Page 117. Policy 11.4.1:

The KSAN Board recommends to add the italicized wording to Policy 11.4.1:

“Guide redevelopment in the Abbott Street and Marshall Street Heritage Conservation Areas outlined on Map 23.1 using the Abbott Street and Marshall Street Heritage Conservation Areas Development Guidelines in Chapter 23 *with principals reflected in the RU1 and RU1c zoning (large lots, single/two unit residential).*”

Heritage Planner

The KSAN Board recommends that the City should hire a qualified Heritage Planner on a part-time basis, with certified Heritage planning expertise, to oversee and proactively implement its Heritage Policy.

Currently, heritage planners from other jurisdictions are hired by developers to present/review their projects. Heritage is complex and such planners are sometimes unaware of the history of the heritage of the area and its importance in the City. A city heritage planner could work directly with the local heritage experts located in the City.

Consultation/Public Input

Residents have been silenced in effect due to cessation of in-person meetings and advisory committees. One of the foundations for OCP 2040, from Imagine Kelowna, is missing: Collaborative – meaning ‘foster resident-driven solutions’. We need to come back to look at the role of community/neighbourhood associations.

KSAN agrees with Objective 9.3 (Page 108):

“Develop diverse partnerships to advance complex social planning issues and increase community wellbeing”.

The KSAN Board would like to see more community involvement into City policy making, including:

- Funding & admin support to invoke, facilitate, acknowledge Neighbourhood Associations (NAs) meetings/input.

- Formal structures & processes to recognize and involve NAs in decisions that impact them; strengthen language and invoke consequences that all processes that do not follow this policy be rendered unenforceable.
- Prepare/review consultation annually to ensure consultation is being carried out.
- Adding NAs as key partners (see Policies 9.3.2 & 9.3.3).
- Reinstate the practice of developers getting sign off on a project from NAs before the project is reviewed by the Planning Department. Neighbourhoods Associations know their neighbourhoods best and often give good ideas to developers.
- Reinstate the reporting of the public's response to projects, at public hearings.

We attended several OCP workshops and noted that less than 50 residents were allowed to sign up and participate, despite many low-cost on-line (e.g., Zoom) software packages that allow upwards of 300 participants. Moreover, we note over the past decade the degree of resident inclusiveness has steadily declined. It is not surprising that resident input is often negative as a result when Council decisions impact us directly without our knowledge. The spiral continues downward as resident blame staff who work closely with the developers and support the projects before going to council and without alerting the NA that these projects are being reviewed by the Planning Department. These kinds of surprises result in the lack of trust by residents.

KSAN suggests several ways the city could turn this lose-lose into a win (Council)-win (staff)-win (resident), patterned after several successful civic examples that already exist:

- UDI has a committee of developers that regularly meet with staff and Councillors, regarding development matters (e.g., DCCs, zoning changes, up-zoning, height and setback variances, loss of views). KSAN suggests that a similar resident taxpayer/voter perspective of NAs would create balanced consultations.
- Commissions - Stronger linkages between Council and Advisory Committees – The cities of Vancouver and North Vancouver structure all their committees to include: one sitting councillor as council liaison, one city staff member as technical expert, associated advocacy group members, and several interested public volunteers. All meetings are open to the public and include admin support. KSAN suggests this would increase transparency, engagement, and support for City planning, especially as we head into some very difficult decisions on how to combat climate change and manage growth.

KSAN recommends the following commissions/committees:

1. Climate Change & SMARTer Growth
2. Heritage & Health Precinct
3. First Nations Partnerships
4. Taxation & Infrastructure
5. Congestion & Transport
6. Housing & Socialization
7. Waste Management
8. Food Security & ALR
9. Parks & Recreation

Climate Change

Overview

The introduction to “Chapter 12 – Climate Change Mitigation and Adaptation” in the document focuses on human urban activities and the built environment. As this chapter is about climate change, the important part of maintaining/planting vegetation and trees throughout the city needs to be mentioned right up front in this chapter. Even though climate change is an environmental issue, the focus in the chapter is on managing the built environment. It is recognized that trees are addressed in Chapter 4: Urban Centres and in Chapter 14: Natural Environment, but the preservation of trees and growing more trees in this chapter is noted towards the end of the chapter, in the 37th policy of the chapter: Policy 12.10.1.

Policy 12.1.1: “GHG emission reduction targets”

The City did not meet (and in fact retroactively weakened) its original climate change targets. KSAN would like to know how the City will achieve them this time, and what adaptive management program it will put in place as a back-up if/when it realizes it is not progressing as planned. Moreover, KSAN recommends that the OCP 2040 use more explicit language such as “climate crisis” and other drastic words.

Further, KSAN recommends and asks new policies are included for the following initiatives to counter climate change effects:

- Instigate car free zones in each urban center.
- Rotate Sunday car-free corridors connecting all City neighborhoods until the City’s active transport network is completed.
- Publicly display Happy/Frown Faces Air Quality monitors in each urban center core area, to engage and inform public on invisible impacts of air pollution, similar to what has been done in The Hague, NL and helped sway public support for car-free downtown business & tourism revitalization.
- Trial Neighborhood resident U-Pass (ComPASS), similar to the NECO Pass offered in Boulder, CO since 1990, and demonstrated in a joint Kelowna-UBCO 2012 study in Glenmore, which increased transit ridership by 30%, with 75% potential resident take-up.
- Expedite approval on permits for housing energy retrofits for heritage houses for example for furnaces, storm windows, roof insulation, etc.
- Replace all civic diesel engines with hydrogen fuel cells (HFCs)
- Make a goal to Net Zero CO₂ emissions by 2035. (Software such as Envision & California GREET can be used to assess all civic policy and infrastructure decisions).

Page 118. Policy 12.1.2: “Land use planning”

This is the second policy under climate change and it is called land use planning but it does not include the role of parks, trees, green space, vegetated setbacks around structures or the natural ecosystem in climate change and moderating climate change effects. This should be added as a bullet to this policy.

Page 122. Objective 12.10: “Invest in ecosystem services and green infrastructure to mitigate and adapt to a changing climate.”

Objective 12.10 is the 10th objective of this chapter. It should be moved to the beginning of the chapter and be the first objective of the chapter to reflect the value of a greener city. There needs to be more policies that relate to tree protection, green space protection, etc. The focus should be to leave enough room to allow for vegetated setbacks, green spaces, trees, etc., including in downtown Kelowna, before starting the construction of new buildings.

Page 122. Policy 12.10.1. “Tree canopy”.

KSAN recommends that the tree canopy as identified in the Urban Forest Strategy be described as it is not clear what this is. There are 36 policies in Chapter 12 written before this one suggesting to the reader that the role of trees and vegetation are rather insignificant with respect to climate change. It is well understood that trees provide shade to reduce temperatures which prevents evaporation and the drying out of soils reducing the potential of soil erosion. The cooler temperatures provided by trees increase biodiversity and plant survival. Trees are big storers of carbon with the release of oxygen. Trees moderate rainfall, runoff, and flooding (and provide bird and other wildlife habitat). This Policy is very brief and doesn’t explain or direct the reader where to find the “Urban Forest Strategy”. (Is this a policy?)

Policy 12.10 needs to be expanded as it is not clear what the Urban Forest Strategy is about and where to find it.

KSAN recommends the following new policies:

New Policy

Reduce construction waste by recycling more of buildings before they are demolished.

New Policy

Add a system-based policy related to SMARTer Growth Neighborhood design that includes parks, bus connections, STEP code buildings, and auto-alternatives.

New Policy

Add the plan for roundabouts at most intersections to increase traffic flow which will reduce idling time, a lead cause of fossil fuel emissions and climate change.

New Policy

Require the laying of electric conduits under all new sidewalks to the curb in commercial and residential areas to allow for future street charging of electrical vehicles.

New Policy

Limit non-vegetated surface coverage of residential sites to 60% or the like.

New Policy

Kelowna to subsidize the cost of purchasing and installing solar panels on residential buildings.

Concrete Buildings

KSAN recommends that the impact of adding more concrete towers be reviewed/investigated. Concrete preparation is a major contributor to carbon dioxide (CO₂) emissions. The cement industry is one of the two largest producers of CO₂, creating up to 8% of worldwide man-made emissions of this gas, of which 50% is from the chemical process and 40% from burning fuel.

Airport

KSAN recommends that the expansion of the airport be limited and reviewed as airplanes are massive CO₂ emitters. Please see related article:

<https://www.theguardian.com/environment/2020/feb/27/heathrow-third-runway-ruled-illegal-over-climate-change>

Further, the airport has been located on agricultural land. Much of the airport is surface parking and buildings. Any expansion of runways or the airport will have to occur on agricultural land. As one of the 10 pillars of this 2040 OCP is the preservation of agricultural land, the expansion of the airport will be contrary to the OCP mandate and reduces our potential for food security which is even more critical if the population is predicted to increase.

Page 120. Objective 12.7: “Support the transition to emerging low-emission transportation technologies”

Given that 40% of all GHG emissions come from transportation, KSAN wants to see the City revise Objective 12.7 to include the underlined phrase ‘emerging low- and zero-emission transportation technologies’. This is in keeping with the federal Hydrogen Strategy launched in December 2020, for which Infrastructure & Communities Canada, as well as CleanBC are now offering significant funding to retrofit existing fleets as well as replace them with new Zero-Emission-Vehicle (ZEV) transportation technologies, including Hydrogen Fuel cells (HFCs), a leading made-in-BC technology, and one that more and more transit, heavy duty trucks, cars, and rail vehicles are using. HFCs produce no GHGs, only water as a by-product, and eliminate nuisance engine noise and carcinogenic particulates in high traffic areas, both of which Kelowna is experiencing in increasing severity.

Infrastructure – Environmental Management

Page 123. Policy 13.1.1: Infrastructure Investment Priorities

KSAN would like to see the City bump Priority 4: “Environmental responsibility” of Policy 13.1.1 to Priority 2, or possibly include it as a Regional need.

Moreover, this OCP does not have chapter called “Environmental Management”. Environmental Management could be included with the Climate Change Chapter 12: “Climate Change Mitigation and Adaptation and Environmental Management”.

Variances & Zoning

Kelowna approves 95% of variances (quote from Ryan Smith). Examples that have affected KSA area:

- Roof heights
- Number of stories
- Density (apt vs SFR)
- Heritage retention/restore vs demolition

KSA would like stronger wording to say that variances should be the exception and not the rule in the KSA area and across the city. We suggest that appropriate wording be included as a new policy in Chapter 16, Page 145, under Administration. Threat of enforcement/being caught/awareness can be avoided if the process is more transparent. As well, the risk of 'backroom deals circumventing policy' will be reduced as the risk of being 'outed' (i.e., public shaming) increases.

KSA has noted that as soon as an orange sign "**In Your Neighbourhood**" appears there will generally be an inappropriate development. This causes stress to the residents. They know there will be a public hearing and a successful application of inappropriate project often in established neighbourhoods. The introduction of developments/use that do not fit into the neighbourhood seems to occur no matter the public outcry. Good planning and consultation will reduce such stress felt by the residents.

Transportation

Urban sprawl is considered unsustainable in terms of costs of new infrastructure distant from the core area of the city, in terms of increasing vehicle traffic which is a major cause of climate change through congestion, idling, general requirements of car usage, and infringement on green sites. Such increased traffic from these outlying areas is also an intrusion through our core area neighborhoods which reduces the sustainability of the neighborhoods. Gordon, Ellis, Pandosy, and Sutherland occur in the KSA area and are now major throughfares.

Page 41. Figure 3.1 Future Land Use Map

The KSA Board supports the potential for low-rise apartments (4 storeys maximum) along transit support corridors as buffers to the single-family homes behind (except in the HCAs). As well, we are wondering how active transportation (AT) gets between urban centers. As avid cyclists, we would prefer parallel bike friendly streets like they have in Vancouver and other cities, away from busy, noisy, polluting, unsafe, higher-speed, vehicle traffic.

New Policy

Require electrical conduits under all new sidewalks throughout the city where on-street parking is allowed, to plan for charging for electrical vehicles.

In terms of technology innovation to address climate change, safety, and congestion (Policies 4.12, 5.22, 6.20), KSA would like the City to study hydrogen-powered civic ZEV tram/train technology (hydral) to provide more equitable low-cost, hi-capacity mobility for all ages, all abilities, including connections in the city and region wide for our residents and tourism. This was first introduced and recommended by our 2005 Okanagan Partnership public consultation process. UBCO research has

confirmed the business case, and technical feasibility for hydrail, which has been running in the EU tourism precincts for several years. Kelowna has an opportunity to increase its tourism attractiveness and be the first in the area to re-introduce tram trains. Similar systems are being advocated in the Fraser Valley and on Vancouver Island in the next five years.

Under Policy 4.21.2: To address traffic congestion, which occurs at intersections most often, KSAN would like to see 'roundabout retrofit' and 'roundabout first' programs in place of traffic signals, which are much less safe for pedestrians, bicycles, and vehicles, and which cause much higher delays, polluting congestion, and unsafe shortcutting through our neighborhoods.

Related to Policies 4.17.8 & 5.16.9:

Policy 4.17.8. **Roadway Modifications.** Implement roadway modifications based on the goals and priorities of the Transportation Master Plan to support mobility options for all modes.

Policy 5.16.9. **Roadway Modifications.** Implement roadway modifications based on the goals and priorities of the Transportation Master Plan to support mobility options for all modes.

Please confirm the meaning of the term 'roadway modifications = 'improvements' = widening'. More road lane-kms, means widening and displacement of badly needed housing, and degradation of living environment and quality of life by cars. We would like priorities in transport infrastructure to clearly state that investments be made in this order: AT, Transit, Shared, Freight, HOVs, then SOV (Policy 4.16.1; Page 52). Moreover, KSAN is against any road widening thru it. We request a moratorium on all new roads in Kelowna pending a study on the congestion reducing benefits of replacing signals with roundabouts, and roads with imbedded rails for tram / trains, (all of which could be funded by reduced road building budgets).

Related to Policy 5.17.7:

Policy 5.17.7. **Safe Crossings.** Create safe & accessible crossing opportunities on collectors and arterials.

What does safe crossings mean? KSAN is against installing any more signals. There are many other more sustainable and affordable safe options that exist.

Related to the following related to the Okanagan Rail Trail (ORT):

Objective 5.19. **Protect and enhance the Okanagan Rail Trail as a vital transportation corridor linking communities in the Okanagan Valley.**

Policy 5.19.1. **Okanagan Rail Trail Protection.** Ensure the long-term protection of the Okanagan Rail Trail by avoiding encumbrances within the Okanagan Rail Trail corridor, including but not limited to: driveways, crossings, and utilities.

Policy 13.8.3. **Okanagan Rail Trail Partnership.** Continue to partner and collaborate with the Okanagan Rail Trail Committee to manage and enhance the trail as well as protect the trail for the long-term opportunity to develop a multi-modal transportation corridor linking the communities along the corridor.

KSAN residents and businesses will benefit significantly from the City's many active transport corridors, both in health outcomes and tourism economic spin-offs. We see similarities in impact between our ORT and Canmore's bike/cross-country trail, and Victoria's Galloping Goose trail. We would hate to see

our ORT corridor used for a general purpose road link, which would destroy its pristine natural experience and resident/tourism value as a quiet, ambient cycling/walking/hiking route. Therefore, KSAN would like to have the City explicitly define “multi-modal corridor”. KSAN does not support its use for general purpose traffic. KSAN would support its use for quiet, slow-moving, ZEV transit and hydrail, which would promote regional and KSAN tourism economic spin-offs and resident health outcomes.

The introduction of Transportation (Page 98. Chapter 7) states the following:

The majority of people living in Kelowna’s Suburban Neighbourhoods are reliant on personal automobiles for most of their day-to-day trips due to their distance from employment hubs and their largely hillside context. As a result, there is limited opportunity to shift transportation trips to more sustainable forms of transport such as walking, biking or transit. Each new development in Suburban Neighbourhoods often require costly roadway expansion that create significant long-term costs for the City.

As new development areas continue to build roads, sidewalks and paths to connect to the existing transportation network, efforts will be made to improve connectivity to destinations like schools, parks and Village Centres through walking, biking and other transportation options. However, the City will continue to prioritize efforts for biking and transit expansion in **Urban Centres** and the **Core Area**.

Objective 7.10. Reduce dependence on the automobile where possible.

Policy 7.10.1. Accept Congestion. Recognize and accept that Kelowna’s streets will become busier as the city grows. Suburban neighbourhoods will have limited potential to shift away from driving, meaning that greater roadway capacity will be needed to support growth in suburban areas. Increases to roadway capacity should consider ways to mitigate impacts on livability of neighbourhoods in the **Core Area** and **Urban Centres**.

As we stated earlier under densification and growth, there are more affordable ways to accommodate growth than adding roads, and at the same time enhance liveability and equitable access. We are against four-laning Pandosy and Richter Streets – these corridors are already too narrow for safe cycling nor comfortable walking. Instead, we look to the City to use parallel bike friendly streets (e.g. , Ethel and Abbott), and promote a more complete adjacent communities with local jobs and services closer to homes that reduce vehicle kilometers travelled and increase bicycling/walking.

Please do not hesitate to contact KSAN if you have any questions or would more input. We hope this has been helpful.

Susan Ames, PhD, MSc, BSc

KSAN President