Our File: 2211-47840-00

September 14, 2026

Town of Comox – Planning Department
1809 Beaufort Avenue
Comox, BC
V9M 1R9

Attention: Randy Houle, Director of Development Services

Proposed Development of Lot 1, District Lot 217, Comox District, Plan 15375, Except that Part in Plan 50460 VIP15375 – Development Permit Area (DPA) 9 Application

On behalf of our client, Comox Valley Airport Commission (CVAC), we are pleased to submit this NE Comox Development Permit Application for 1200 Military Row ("subject property") for the Town's review and processing. The proposed development of 1200 Military Row includes expansion of the airport's (YQQ) long-term parking area, which will be sited within the footprint that was previously occupied by Vancouver Island Enterprises' (VIE) landscaping supply business. VIE is currently relocating to 1301 Knight Road to allow the proposed development on the subject property to proceed. The general site plan for the subject site is shown in **Figure 1** below and shown more clearly in the supporting documents included in this application.

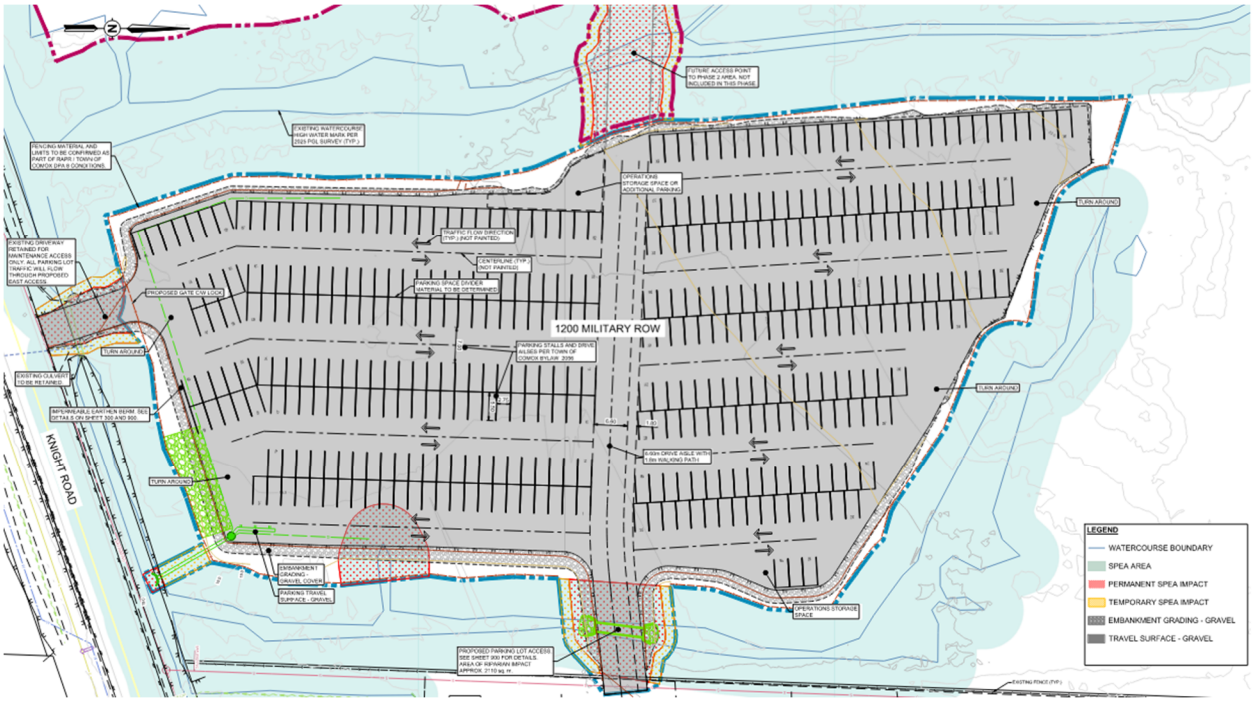


Figure 1: Preliminary Site Plan – 1200 Military Row

The subject property is a 9.45 ha property located at 1200 Military Row. The property is zoned E-3, “Light Industrial” (previously I2.1, “Aeronautical Industrial”). Shown in Figure 2, the subject property is within a North East Comox Permit Area.



Figure 2: Town of Comox: DPA 9 North East Comox

To facilitate the project, the following site activities are anticipated:

- Remove existing soil stockpiles from the site.

- Prior to commencing construction, install Erosion and Sediment Control (ESC) measures on the property, consistent with Town Bylaw No. 1824.
- Construct an underground stormwater detention system to offset changes in hydrology.
- Construct gravel parking lot.

Development Permit Guideline Compliance

Per DPA 9 Guidelines, no alteration of land can occur unless the applicant first obtains a development permit. Table 1 outlines both the applicable DP guideline and how this proposal is compliant.

The previous land use was the VIE landscaping supply operation, with soil stockpiles occupying most of the site. Access is presently provided by a gravel driveway, which is planned to be retained under the proposed use as a maintenance access.

The proposed land use is to construct a gravel parking lot, resulting in a change in the hydrologic response of the area. To mitigate these impacts, an underground stormwater detention facility is proposed at the south end of the property. The intent of the underground stormwater detention facility is to slow down the rainfall runoff leaving the property.

Per the preliminary master land use plans previously presented to the Town, development on the subject property will be completed in two phases. The stormwater detention storage for Phase 1B is provided in an underground stormwater detention storage. In Phase 2 development (commercial and hotel uses being considered at this time), stormwater detention storage is provided in an above-ground dry detention pond. The underground stormwater detention storage for Phase 1B will meet the performance requirements of the Town's Northeast Comox Stormwater Management Plan (NECSWMP). It should be noted that the underground stormwater detention storage would be sited on airport lands and operated and maintained by the airport.

The risk to existing downstream infrastructure is considered low, given existing and proposed conditions on the property and the size of the property relative to the Queen's Ditch drainage catchment. The proposed underground stormwater detention pond can be designed to mitigate changes in peak flows up to the 100-year storm event (per Bylaw 2048 and NE Comox design principles).

Table 1: DPA 9 Guideline Compliance

DPA 9 Guideline	*Response / compliance*
The quantity and quality of ground water flows to Lazo Marsh, Hilton Springs and ALR lands to the north of Lazo Marsh, east of Pritchard Road and south of Knight Road, should be maintained in relation to existing site conditions	Stormwater management for the development will be in accordance with the Town of Comox North East Comox Stormwater Management Plan methodology towards mitigating the post-development stormwater impacts on the Lazo Marsh. Past geotechnical investigations (by others), current groundwater monitoring programs, and prior infiltration testing (by McElhanney) indicate that there is low groundwater recharge potential due to confining layers at and below ground surface. The proposed concept will maintain existing patterns and proposes to discharge runoff to the Knight Road ditch. McElhanney submitted concept plans to the Town in June 2025.
The impact of surface and ground water flows on flood frequency and duration on lands downstream and down-slope of this DPA for up to and including the100-year storm event should be the same or less than existing site conditions.	DPA 9 and North East Comox Special Requirements (Bylaw 2048, Schedule 7) set engineering standards for long-term watershed-scale development. For the development on the subject property, the Town of Comox's “NE Comox” stormwater management approach to stormwater will be referenced, ensuring downstream protection. Proposed strategies will keep cumulative storm flows at or below current site levels for events up to a 100-year storm. Infiltration requirements for the entire property will be satisfied as part of Phase 2.
A 15-metre undisturbed natural state buffer must be provided from the Natural Boundary of Hilton Springs and the Top of Bank of the conveyance ditch located along the road dedication for Cambridge Road, as identified on a BCLS certified by a British Columbia Land Surveyor (BCLS) certified site plan.	The natural boundary of Hilton Springs is noted to be located along the east end of Cambridge Road and is several hundred meters away from the site development at 1200 Military Row. The buffer requirements are not applicable to 1200 Military Row development.
A report by a professional engineer with expertise in geotechnical engineering or hydrology and a professional agrologist may be required in accordance with Comox Planning Procedures Bylaw 1780 addressing measures necessary to ensure: • the quality and quantity of ground water flows are maintained in relation to existing site conditions; and • the impact of surface and ground water flows on flood frequency and duration on lands downstream and down-slope of this DPA for up to and including the 100-year storm event should be the same or less than existing site conditions	In addition to a Stormwater Management Plan for the development, a hydrogeology investigation and report (prepared by a Professional Engineer) will be prepared to demonstrate compliance with quality and quantity of groundwater flows (maintained to existing site conditions) and that surface and groundwater flows will be equal to or less than existing site conditions as per the North East Comox Stormwater Management Plan.

The subdivision of land; alteration of land, including vegetation; or construction of, addition to, or alteration of a building or other structure should be in accordance with any required professional engineer and professional agrologist impact assessment report, including any works or protective measures specified.	The subject site is partially occupied by VIE (the Phase 1B area) and that portion of the site was covered with soil stockpiles (relocation is in progress). There are riparian areas at the north, east, west, and south ends of the Phase 1B development area. Environmental permitting requirements indicate that a portion of these riparian areas will be enhanced, and the proposed development will not encroach into the riparian areas. The subject property does not directly border ALR lands and does not require an ALR buffer.

Rationale

The intent of this application is to support the proposed development of the site. An Erosion and Sediment Control Permit Application, Tree Cutting Permit, and DPA 8 Application for the development will be submitted separately.

The DPA 9 Application was made via the Citywide Portal. To support the online application, the following documents were uploaded:

- Current title search
- Copies of charges/covenants
- Agent authorization form
- Contaminated sites screening form
- Stormwater Management Plan accompanied by Issued for Development Permit Drawings
- Cheque in the amount of $1,000 representing the application fee (Delivered to Town Hall, separately)

Should additional information or clarification be required, please contact the undersigned.

Sincerely,
McElhanney Ltd.

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