

From: [Alison Nicholson](#)
To: [J Schmidt](#)
Cc: [Zoning](#); [legislativeservices](#)
Subject: RE: Zoning Changes Threaten Small Farm Viability
Date: Sunday, March 29, 2026 3:01:24 PM

Thanks for your clarification – I will forward your note to staff so they can make sure it is clarified. A.

Alison Nicholson
CVRD Director,
Cowichan Station/Sahtlam/Glenora
250 510 3544

From: J Schmidt [REDACTED]
Sent: Sunday, March 29, 2026 1:31 PM
To: Alison Nicholson <alison.nicholson@cverd.bc.ca>
Subject: Re: Zoning Changes Threaten Small Farm Viability

Dear Alison,

Thank you for your response and for providing the definition of agriculture.

I understand that agriculture is a permitted use within the proposed zones and that the definition includes poultry and apiculture. However, my concern is not whether agriculture is permitted, but how the general regulations are applied within the bylaw.

In reviewing the draft, Section 4.5 (Backyard Hen and Beekeeping) is located within the General Regulations, and Section 2.5 indicates that where no specific regulation applies, the general regulations are to be applied. I have not been able to find any explicit clause that exempts agricultural uses or farm-status properties from these particular limits.

As a result, the current wording appears to allow for an interpretation that the hen and hive limits could still apply broadly, including to rural or farm-status properties, unless clearly stated otherwise.

For those of us operating small-scale agricultural activities, this lack of explicit exemption creates uncertainty. Clarity in the bylaw wording is important to ensure that regulations intended for small-lot residential properties are not inadvertently applied to legitimate agricultural uses.

Could you please point me to the specific section in the draft bylaw that explicitly exempts agricultural or farm-status properties from Section 4.5, or confirm whether such clarification will be included in the final version?

Thank you again for your time and for engaging on this matter.

Sincerely,
Johanna Schmidt

On Sun, Mar 29, 2026 at 12:52 PM Alison Nicholson <alison.nicholson@cverd.bc.ca> wrote:

Dear Johanna,

I don't have your address but I know that RF50/50 zones are proposed as Rural Residential either 1 or 2. Regardless, Agriculture is a permitted use in both those zones so the regulation about backyard chickens does not apply. Below I've copied the definition for agriculture from the proposed bylaw – as you can see it is broad with few restrictions.

“Agriculture” means the use of land, buildings, or structures for the growing, rearing, producing, or harvesting of livestock or agricultural crops, and includes the processing on a parcel of the primary agricultural products harvested, reared, or produced on that parcel and the use and storage of associated farm machinery, implements, and agricultural supplies. Includes: Apiculture; aquaculture (land-based); horticulture; nursery; poultry. Excludes: Cannabis micro production and processing; cannabis standard production and processing; domestic pet breeding; intensive agriculture; kennel.

Farm status properties exist in the proposed zones that permit agriculture including A1&2, F1 and RR1&2.

Hope I've clarified.

Alison Nicholson
CVRD Director,
Cowichan Station/Sahtlam/Glenora
250 510 3544

From: J Schmidt [REDACTED]
Sent: Sunday, March 29, 2026 9:48 AM
To: Alison Nicholson <alison.nicholson@cvrd.bc.ca>
Subject: Re: Zoning Changes Threaten Small Farm Viability

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Dear Alison,

Thank you for your reply and for raising concerns about fence heights and backyard chickens at the directors' meeting.

I have carefully reviewed draft Bylaw 4710 on the planyourcowichan.ca website. While I appreciate your assurance that the strict backyard chicken regulations are intended only for small-lot residential areas, the current wording in the general regulations section does not clearly exempt rural properties like mine and appears to apply more broadly across zones.

My property is zoned RF-50/50 (Rural Residential / Forestry Conservation) with farm status. The proposed limits — including a maximum of six hens, a prohibition on roosters, and only four hives — would make my small-scale farm operations unsustainable.

Maintaining a higher number of hives is necessary in rural areas to support healthy, resilient colonies, particularly through winter. At a time when bees are facing serious declines that threaten food security

and agricultural stability, restrictive hive limits in rural zones are counterproductive. Pollinators are essential to roughly 75% of flowering plants and a significant portion of global food production, and policies should reflect the need to support—not constrain—their survival and the agricultural systems that depend on them.

Can you please clarify or confirm whether the final version will clearly exempt:

- Farm-status properties?
- Larger rural parcels in the proposed A1, A2, F1, RR, or rural resource zones that my RF-50/50 property is expected to fall under?
- Existing lawful small-scale agricultural operations?

I will also be submitting detailed written comments to zoning@cvrd.bc.ca as you recommended.

Thank you for your efforts to protect Area E's rural character. I look forward to any specific updates on amendments related to livestock, poultry, and beekeeping in rural zones.

Sincerely,
Johanna Schmidt

On Fri, Mar 27, 2026 at 12:11 PM Alison Nicholson <alison.nicholson@cvrd.bc.ca> wrote:

Dear Johanna,

Thank you for writing.

This is the beginning of the review stage for the proposed comprehensive zoning bylaw. There is plenty of time to change/refine based on community comments and input from the advisory planning commissions. The EA directors had their first opportunity to read and comment on the proposed regulations yesterday and I can assure you there will be changes – for example, we have raised concerns about fence height rules and we have asked staff to relax the regulations about **backyard chickens – which should be noted only apply to small lot residential areas**. Folks living on rural acreages (proposed zones A1, A2, F1 and RR 1 & 2 which is much of Area E) have agriculture (livestock and crops) as a permitted use. I am not sure where you live but it sounds from your description that the backyard chicken regulation would not apply to you.

I can assure you in Area E I am working hard to maintain the rural lifestyle we depend on and enjoy. Unfortunately there is misinformation circulating on social media. We would appreciate it if you took a look at the draft regulations and the proposed zoning map for your lot to check to make sure the proposed regulations make sense for you. Materials can be found here <https://www.planyourcowichan.ca/zoning-bylaw-project> So far I have not noticed many significant changes from the existing zoning for Area E apart from a

relaxation of rules about accessory dwellings but to be sure I am encouraging everyone to review the material and provide specific comments. Everything will be considered. Send comments to zoning@cverd.bc.ca.

Any questions please reach out.

regards

Alison Nicholson
CVRD Director,
Cowichan Station/Sahtlam/Glenora
250 510 3544

From: J Schmidt [REDACTED]
Sent: Friday, March 27, 2026 9:59 AM
To: Alison Nicholson <alison.nicholson@cverd.bc.ca>
Subject: Zoning Changes Threaten Small Farm Viability

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Dear Alison Nicholson

I am writing to add my voice to the concerns regarding the proposed zoning changes, which would have serious consequences for our farm and our ability to continue operating.

Our property has farm status, and we rely on a mix of small-scale agricultural activities, including beekeeping, honey production, and the sale of duck eggs, chicken eggs, and fertilized eggs. The proposed limits on hive numbers and poultry, along with the prohibition on roosters, would directly impact these operations. We recently made a significant investment in heritage-breed chickens with the intention of building a fertilized egg business. Without the ability to keep a rooster, that investment and future income stream would be lost.

Reducing the number of hens to six would also make egg production impractical, effectively ending our ability to supply farm-fresh eggs. Our chickens currently free-range across our 2.5-acre property, contributing naturally to soil health and supporting the broader ecosystem that sustains our bees. Restricting them to confinement would not only change their quality of life but also diminish these environmental benefits.

The proposed four-hive limit is equally concerning. Beekeeping is already challenging, particularly through the winter, and maintaining a higher number of hives increases the likelihood of colony survival. Imposing such a low cap at a time when bee populations are under pressure feels both restrictive and counterproductive.

Our property is rural and surrounded by wilderness, which makes a one-size-fits-all approach to zoning inappropriate. Regulations that may be reasonable in more densely populated areas do not reflect the realities of properties like ours.

We have invested considerable time and financial resources into building our farm. These proposed changes would place that investment at risk and could force us to scale back or cease operations. I ask that the broader impacts on small, rural farms be carefully considered.

Flexible solutions—such as recognizing differences between rural and residential zones, introducing a grandfather clause, and maintaining allowances for existing farm-status properties—would go a long way in addressing these concerns.

Thank you for taking the time to consider the real-world effects these changes may have on small farmers like us.

Sincerely,
Johanna Schmidt