

To: CAO for the Electoral Area Services Committee

Date: 2019-09-10

From: Katelyn Hipwell, Planner II

File No: 6480-20-427

Subject: Consultation Summary – Popkum-Bridal Falls Official Community Plan Update

INTENT

This report is intended to provide the Electoral Area Services Committee with a summary of the community engagement undertaken since the Regional Board gave first reading to the Popkum-Bridal Falls Official Community Plan update and the feedback received thus far. Staff is not looking for a recommendation and is providing this summary for information.

STRATEGIC AREA(S) OF FOCUS

PRIORITIES

Support Environmental Stewardship

Priority #2 Air & Water Quality

Foster a Strong & Diverse Economy

Priority #4 Tourism

Support Healthy & Sustainable Community

Priority #5 Outdoor Recreation

Provide Responsive & Effective Public Services

BACKGROUND

The current Electoral Area “D” OCP has served the community for over 20 years. The OCP was first adopted in 1998, with several amendments to facilitate suburban residential and commercial developments. Overall, the OCP has been an effective tool and development has occurred generally as set out in the Plan policies.

Looking ahead, Popkum-Bridal Falls is expected to continue growing and an updated Community Plan ensures future growth reflects community values, best practices and legislative requirements.

The Regional Board gave first reading to the Popkum-Bridal Falls Official Community Plan in December 2018 and subsequently authorized staff to proceed with community engagement to allow intensive review of the draft and opportunities to provide feedback.

This memo summarizes the engagement undertaken by staff and the feedback received throughout the process to date.

DISCUSSION

Community Engagement Program

Community engagement initiatives for the Popkum-Bridal Falls Official Community Plan update began in January 2019 after release of the Plan for public review in December 2018. The following community engagement and consultation has taken place:

1. Popkum Residents Association Annual General Meeting

Staff presented the draft Plan and highlighted key policy updates at the AGM in January 2019. The meeting was well attended by approximately 50 residents. The meeting provided an opportunity for residents to express concerns and ask questions.

2. Public Online Survey

The survey, which was made available online and in hard copy, received a total of 47 responses. Survey questions and responses are summarized entirely in **Appendix "A"**.

3. Community Newsletter

A newsletter (**Appendix "B"**) was distributed in March 2019 advising residents of an upcoming Open House and other opportunities to provide feedback on the draft Plan. The newsletter was made available on the FVRD website, through bulk mail to all Area D residents, and addressed mail to non-resident property owners.

4. Social Media

Information regarding the draft Plan was routinely posted to FVRD social accounts to raise awareness of ongoing consultation and opportunities to provide feedback.

5. Public Open House

The FVRD hosted a public open house in April 2019 to showcase the draft Plan. Over 60 residents attended the event, with a total of 45 written comment submissions. The Open House is summarized in **Appendix "C"**.

6. Plan Review Team

A team comprised of seven community volunteers met with FVRD staff four times throughout May and June 2019 to methodically review and discuss each section of the plan. The detailed feedback received by the Plan Review Team is summarized in **Appendix "D"**.

7. Referrals to Stakeholders

Referral letters were sent in February and July 2019 to various agencies and stakeholders requesting comments on the draft Plan. A total of 20 letters were sent. To date, staff has received eight formal responses and continue to engage and receive comments in response to these referrals.

8. Meeting with Cheam First Nation

Staff met with Cheam First Nation in May 2019 to discuss the draft Plan and receive comments. Discussions with regard to areas of mutual interest are ongoing at this time.

Feedback and Resultant Revisions

Staff has received a wide array of comments concerning various aspects of the draft Plan. Responses to referrals continue to be provided by a number of agencies. Revisions to the draft Plan in response to the feedback received will be consolidated and presented to the Board at second reading.

Next Steps

Milestone	Target Date
Feedback to Draft OCP <ul style="list-style-type: none">Plan Review TeamNewsletterOpen House EventSurveyReferrals to Stakeholders (Ongoing)	Spring/Summer 2019
Revisions <ul style="list-style-type: none">Based on feedback	Summer 2019
Consider the OCP in conjunction with Financial Plan & other plans 2 nd Reading of OCP Electoral Area Services Committee and Regional Board	Fall 2019
Open House and Public Hearing	Fall 2019
3 rd Reading and Adoption Electoral Area Services Committee and Regional Board <small>*subject to consideration of public hearing feedback</small>	Fall 2019

COST

Costs associated with the development, review and revision of this plan are provided for in the EA Planning budget. This includes public consultation initiatives.

CONCLUSION

The draft Popkum-Bridal Falls Official Community Plan was made available for public review in December 2018. Since that time, a number of community engagement initiatives have been undertaken to solicit feedback and comments on the draft. This has included a survey, newsletter, open

house, volunteer based Plan Review Team, referrals to stakeholders, and various meetings. Revisions arising from feedback received as a result of community engagement will be consolidated and presented to the Board at second reading. The public hearing will be scheduled after second reading has been given by the Board.

COMMENTS BY:

Graham Daneluz, Deputy Director of Planning & Development: Reviewed and supported.

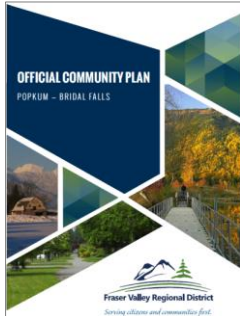
Margaret Thornton, Director of Planning & Development: Reviewed and supported.

Mike Veenbaas, Director of Financial Services No further financial comments.

Jennifer Kinneman, Acting Chief Administrative Officer Reviewed and supported.

Appendix "A"

Popkum-Bridal Falls Official Community Plan Survey Response Summary



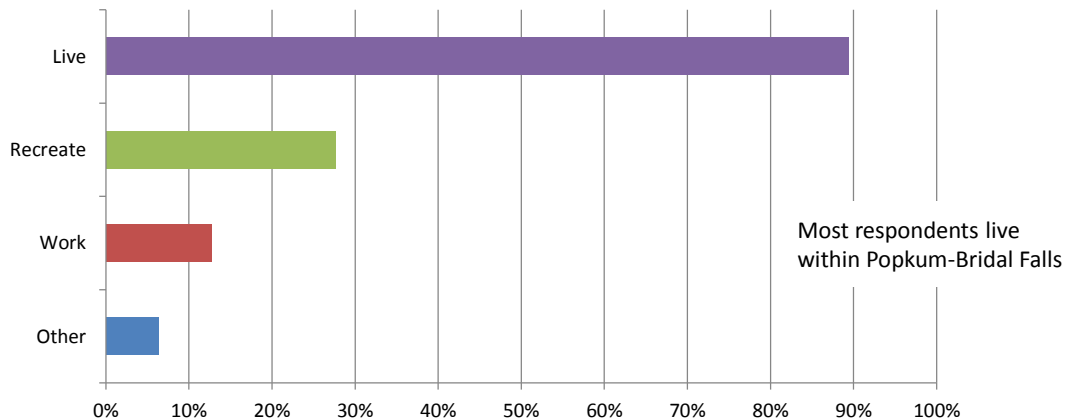
Online survey open from March 24, 2019 to June 2, 2019

We received 47 responses

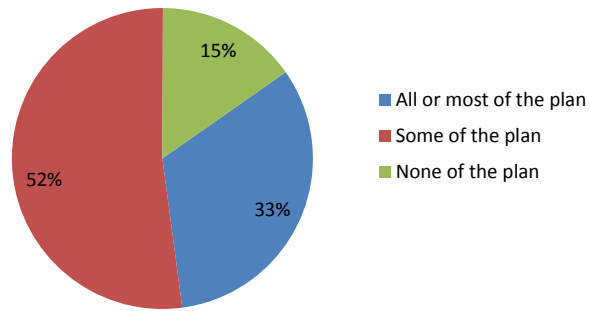


Popkum-Bridal Falls Official Community Plan – Survey Response Summary (2019)

Do you live, work, recreate, or have another interest within the Popkum-Bridal Falls area (Electoral Area D)? Check all that apply

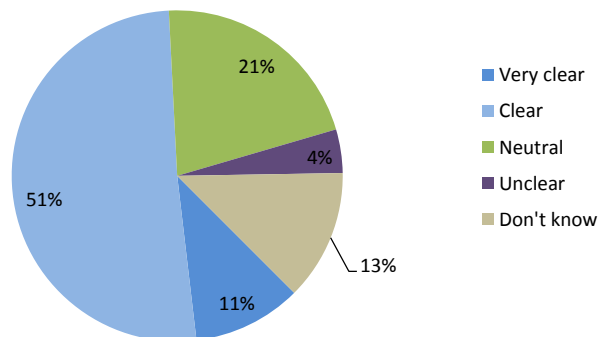


Have you read the Draft Official Community Plan for Popkum-Bridal Falls? I have read:



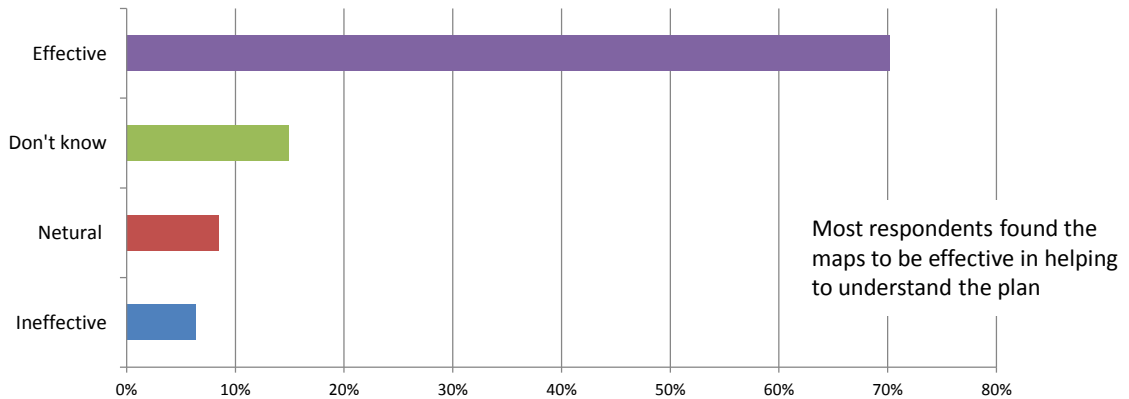
Most respondents read some or all of the plan

How clear and readable is the plan?

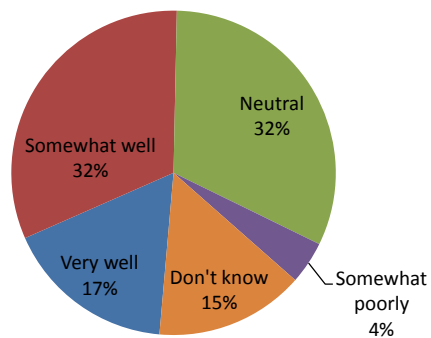


Most respondents considered the plan to be clear, or very clear

How effective were the maps in helping you understand the plan?

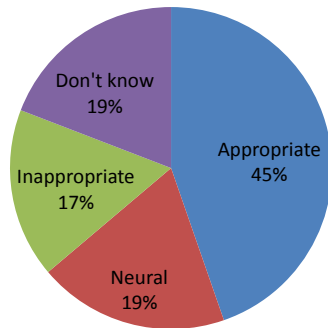


Overall, how well does the plan reflect the challenges and opportunities of the community?



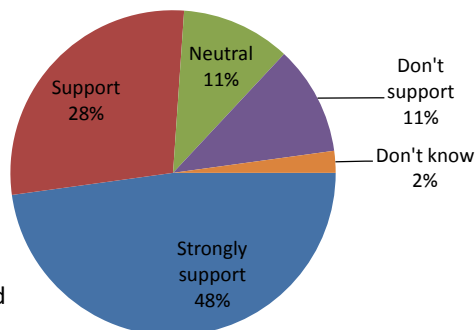
49% of respondents indicated the plan reflects the communities opportunities and challenges, while 32% were neutral.

Do you think the current pattern of growth is appropriately sensitive to existing development?



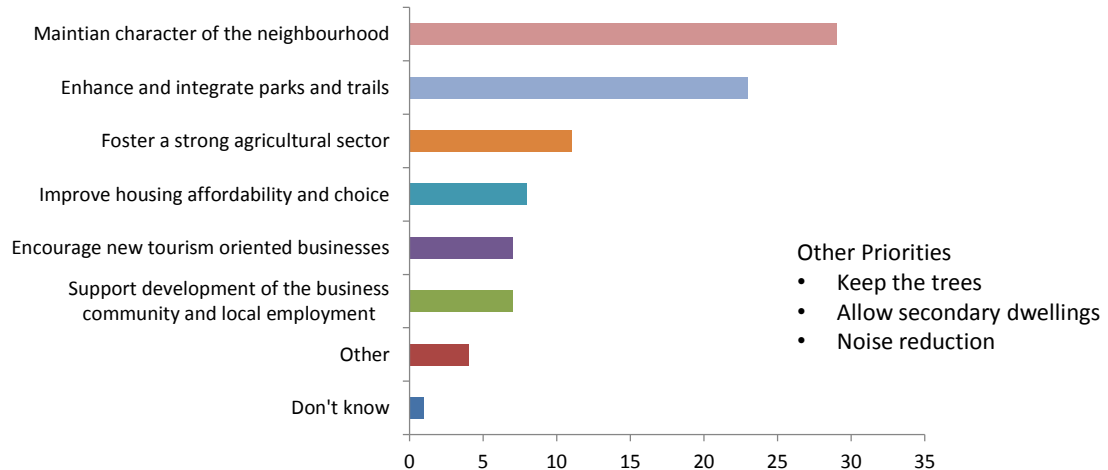
45% of respondents indicated the current pattern of growth is sensitive to existing development while 19% were neutral, and another 19% did not know and skipped the question.

Do you support the vision in the plan to enhance and connect existing parks and trails?

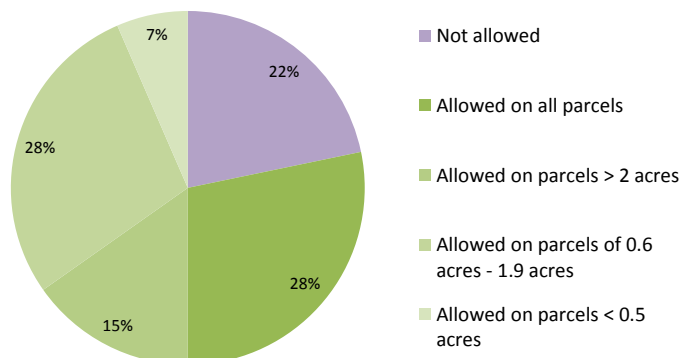


Over ¾ of respondents support or strongly support the parks vision and policies to enhance and connect parks and trails

What are the top priorities the plan should focus on?



How do you feel about secondary dwellings such as basement suites, garden suites, or carriage houses within Popkum-Bridal Falls? Should they be:



- 78% of all respondents indicated support for some type of secondary dwelling
- 22% of respondents were not supportive of secondary dwellings

What parts of the plan did you like the most?

- The parks plan
- Connecting parks & trails
- Parks & trails will be maintained
- Parks & trails
- That the plan includes trails & greenways
- Continued expansion of the trail network and expansion of parks
- Parks and recreation
- Maintaining the character of the area
- Plan is very comprehensive (x2)
- Future development
- Not impressed with the sewage proposal
- Sorry, nothing stands out
- First Nation neighbour content
- Emphasis on maintaining the unique character of Popkum and the plan to develop walking and cycling trails, acknowledgment of Sto'lo land use needs
- The maps helped locate the different areas. Plan is well written
- Maps were very informative
- Protecting the view of the mountains, and watching development to avoid a congested highway access



Is there anything else you would like to see included or changed in the plan?

- More information on secondary dwellings
- I'd like to see more real parks. Linear parks should not count as parks
- Secondary dwellings supported
- Improved safety along Yale Road and other arteries (Hwy 9)
- A long term plan for the sewer system that encompassed all of Popkum, not just areas within
- Put more emphasis on the Hwy 9 corridor. It has great potential for future business and tourism
- Stronger efforts to control the destruction of trees. Better signage for Bridal Falls park to help reduce traffic on side roads by lost tourists
- Illegal dumping on Cheam Forest Service Road needs to be addressed
- Address illegal dumping in the cul-de-sac on Popkum Road S and Cheam Forest Service Road
- Address the need for a truck stop. Trucks currently congregate on the small road in Bridal Falls
- Did I miss the recycling plan? It would be great to have curbside collection for composting in addition to recycling pick-up
- How about a dog park?
- No mention of a plan to reduce air pollution by commercial and backyard burning. There should be a complete ban on outdoor burning as it is a significant cause of poor air quality and health problems
- Options for a grocery store and restaurants
- Internet services and fiber in rural areas
- Plan refers to what it can do for residents of the Popkum community. It should include what is expected of the residents, i.e. their responsibilities. I'm personally tired of the 'one-way' planning procedure. Address the responsibilities not just the rights and expectations!



OFFICIAL COMMUNITY PLAN

POPKUM – BRIDAL FALLS

March, 2019

The 1998 Official Community Plan (OCP) built Popkum and Bridal Falls from a population of 900 people to a community of 1,600.

The job of the next OCP is to move from community building to integration. What does that mean? It means the 2019 plan—now in draft form for public review—will guide the next phase of development to ensure that it fits well with the existing community. It focuses on ensuring sensitive infill; completing the park and trail network; supporting efficient environmentally sensitive services such as sewer; and, enhancing local commercial amenities.

This Plan is for YOU!

No two communities are alike. Below you can see the differences between Electoral Area D versus the FVRD region as a whole.



Open House
April 24 6 pm - 9 pm
Rosedale Traditional School
50850 Yale Road

Online Survey
www.fvrd.ca/areadocp
Closes May 24



Fraser Valley Regional District

AREA D

Average Age
40

Median Household
Income
\$92,160

Married or
Common-law
72%

Have Children
51%

Own Their Home
92%

Live in Single
Family Home
86%

FVRD

Average Age
41

Median Household
Income
\$69,289

Married or
Common-law
60%

Have Children
50%

Own Their Home
73%

Live in Single
Family Home
58%

Contact

Join our OCP Review Team



Get involved and have your say

The Draft OCP can be found at www.fvrd.ca/areadocp. Please read it and tell us your thoughts. There are several ways you can reach us:



Attend our Open House
Wednesday, April 24: 6 pm to 9 pm
Rosedale Traditional School
50850 Yale Road



Fill out our Online Survey by
visiting www.fvrd.ca/areadocp



Email your comments
to planning@fvrd.ca



Call us to chat
1-800-528-0061

Maybe you have a lot to say and a survey, email or open house isn't going to cut it. So call us. Let's meet for coffee. We will meet with you one-on-one or with small neighbourhood or community groups. Invite us to your book club! We need your input to be sure we are on the right track.

Looking for volunteers

Are you a detailed-oriented person who really likes to get into the nitty-gritty? Or are you the "big picture" type who can see possibilities and opportunities for miles? Whatever type of person you are, if you're passionate about your community consider volunteering for our OCP Review Team. The time commitment involves meeting with us for a couple of hours in the evening three or four times during the month of April. We want to review the draft plan as a whole (that's you big picture people), but also to examine every facet of it, which is where we need you detailed folks.

If this sounds like something you'd like to be part of, please contact Graham Daneluz at 604-702-5046, or gdaneluz@fvrd.ca.

45950 Cheam Avenue. Chilliwack, BC V2P 1N6
www.fvrd.ca | planning@fvrd.ca
(604) 702-5000 or 1-800-528-0061

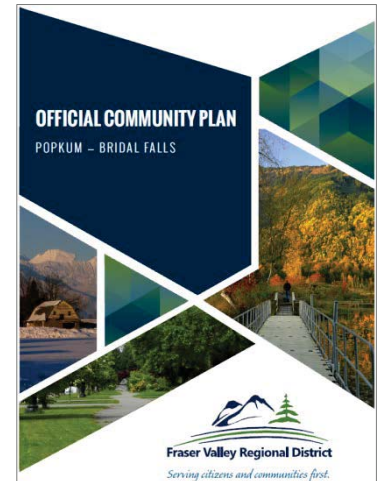
Popkum Bridal Falls Open House – Overview

The Fraser Valley Regional District hosted an open house on April 24, 2019 to showcase the draft Popkum-Bridal Official Community Plan. The Official Community Plan (OCP) was created based on information collected from the community, and sets the direction for growth and change in Popkum-Bridal Falls over the next 15 - 20 years.

The open house provided an opportunity for residents to view the plan and to provide feedback to FVRD.

The open house included:

- 10 display boards
- 2 poster boards to write comments on
- A station to 'Name that Park'
- An information table with copies of the OCP, technical studies, and past presentations to the community
- A table with laptops to take a survey about the OCP
- An 'Ask me about your property' station
- FVRD Planning staff available for discussion, questions, and to hear any concerns



The event resulted in:

- Over 60 attendees
- Submission of 45 written comments
- Many in person conversations
- A list of individuals interested in participating in an OCP review committee



Summary of what we heard (Comment Board & Comment Cards)

- **Parks and Trails** are an important component of the community
 - More parks and trails are needed
 - Trails under the powerlines
 - Keep as many trees as possible
 - Develop and create access to Ferry Island Park
 - Develop Bridal Falls hiking areas
 - Change OCP to protect the wetland within Rose Garden
 - Add more swings to Shannon park
- There is a need for safe **Road Crossings** in Popkum. Suggested crossing locations include:
 - The Yale Road and Hwy 9 roundabout and
 - Hwy 9 near Rose Garden
- **Lot Sizes:** Large lot sizes of at least ¼ acre are important
- Maintaining the **Character of the neighbourhood** is very important
- **Amenities:** There is a desire for more amenities which serve the community including, a community hall, a medical clinic, and a grocery store
- **Other Concerns:**
 - There is too much noise and litter at the round about
 - Semi truck braking systems are excessively noisy
 - Schools capacity needs to be available to handle proposed growth
- **Secondary dwellings.** We heard mixed opinions about secondary dwellings in the community.
 - In the online survey , over three-quarters of respondents indicated some acceptance of secondary dwellings.

Online Survey

FVRD conducted an online survey about the OCP and community priorities that was still running at the time of the open house. The survey was available from March 24 to June 2, and will have the results published as a separate document.



Official Community Plan Review Team

The Fraser Valley Regional District would like to thank the individuals who participated in the Official Community Plan (OCP) Review Team. Community input is vital to ensure the plan is on the right track and reflects the values and wishes of the community. So, thank you!

The review team met four times in May and June 2019 to methodically review the entire plan. Seven community volunteers with varied backgrounds, two FVRD staff members, and the Director for Electoral Area D reviewed and discussed each policy and section of the OCP. The detailed feedback is now being integrated into the plan.



What we heard (key themes)

- Large lot sizes and neighbourhood character is to be retained
- Preservation & enhancement of parks and greenspaces is valued
- Tree retention at the subdivision stage should be improved
- School planning is required to meet growth
- Greater focus on environmental sustainability, including on air and water quality preservation
 - Consider further restriction of uses on conservation lands
- Policies to protect farmland need to be strengthened
- Address litter issues
 - Require commercial areas to provide garbage receptacles
- Address large truck parking: properly accommodate trucks, or take measures to prohibit them
- Consider expanding 'Good Neighbour Practices' to all residents, not just construction sites
- Consider inclusion of privacy in the design guidelines for West Popkum Development
- Sidewalks should be included as a community service with capital replacement reserves
- Encourage landowners to limit impervious services to address on-site storm water management
- Prioritize connectivity of pedestrian and bicycle trails. Utilize Right-of-way lands for recreation
- Include park spaces for broad range of users, including community meeting spaces, sports facilities, dog parks, etc.
- Need to clarify some geohazard components
 - Reduce technical language to improve ease of reading, and increase readability of maps
- Greater sensitivity to fire concerns
 - Increase awareness of wild fire hazards and strategies to reduce fire risk
 - Address illegal burning and fires in residential neighbourhoods

The final plan is coming soon!

AREA D OFFICIAL COMMUNITY PLAN REVIEW TEAM

MEETING NOTES

Date: Thursday, May 30, 2019

Time: 10:30 am – 12:45 pm

Location: FVRD, Meeting Room 224, 45950 Cheam Avenue, Chilliwack, BC

1. Welcome and Orientation

- a. Group Discussion - Key issues facing the community:
 - i. Desire to maintain large, executive style lots
 - ii. Preservation of community/regional/provincial parks and greenspaces
 - iii. Numerous issues associated with growth require increased regulation and more effective enforcement, e.g.:
 - Burning
 - Dog control
 - Litter associated with commercial uses at roundabout
 - "No Parking" zones being ignored
 - Inadequate parking for commercial uses
 - iv. Tree retention during subdivision stage of development should be improved
 - v. Accessibility and disability issues underrepresented in plan
 - Inaccessible park trails
 - Lack of access in commercial developments
 - vi. Community revitalization required – lack of sense of community
 - Community centre or meeting space required
 - Increase in park diversity required (e.g. dog park)
 - vii. Rosedale School at capacity – school site planning required
 - viii. Increased focus on environmental sustainability required
 - ix. Community based emergency preparedness plan required
- b. Reviewed proposed meeting schedule
 - i. Consensus was to maintain schedule as proposed
 - ii. Option to email Graham with comments if unable to attend a specific meeting date

2. What is an OCP?

- a. Scope of an OCP - high level policy document; a statement of policies and objectives to guide development over the long term
- b. Content of an OCP - land use management focus but also addresses issues such as environmental protection, infrastructure (roads, sewer, water), etc.
- c. Power of an OCP – once adopted, all subsequent bylaws and works must be consistent with the Plan

3. Plan Review

- a. *Section 1 – Introduction*
 - i. General Comments
 - Incorrect name of Popkum Residents Association is used
 - List of key partners is incomplete (MOTI, RCMP, Fire Department, etc.)
 - ii. Policy Suggestions
 - Highlight Ministry of Transportation as key partnership
- b. *Section 2 – Our Community*
 - i. General Comments
 - Should Rosedale School be listed as an amenity for Popkum-Bridal Falls?
 - Number of mobile homes cited may not be accurate
 - ii. Policy Suggestions
 - Inclusion of Halq'eméylem and historical references in place naming (streets, parks, etc.)
- c. *Section 3 – Vision and Values*
 - i. General Comments
 - ii. Policy Suggestions
 - Stronger language required for “big-picture goals” to include: accessibility; air and water preservation; climate change; ensuring infrastructure keeps pace with rate of growth, particularly highway safety
- d. Comments provided by email from absent team member

AREA D OFFICIAL COMMUNITY PLAN REVIEW TEAM

MEETING NOTES

Date: Thursday, June 6, 2019

Time: 10:30 am – 1.00 pm

Location: FVRD, Meeting Room 224, 45950 Cheam Avenue, Chilliwack, BC

1. Plan Review

a. Section 4 – General Land Use Policies

i. General Comments

- Various numbering corrections required

ii. Policy Suggestions

- Include language in support of compensation offered to landowners within utility corridors whose lands are not returned to a farmable state after utility works are carried out

b. Section 5 – Land Use Designations

i. General Comments

- Land use designations summaries are slightly misleading in their descriptions

ii. Policy Suggestions

- Additional land use designation created for areas affected by geohazards – forest/limited use designations are too broad with allowable uses to be suitable for areas subject to serious geotechnical hazards
- Limitations pertaining to bio-solid composting on agriculturally designated land
- Strengthen language to ensure preservation of farmable land is prioritized over the long term
- Covenanted areas of Rose Garden should be re-designated as conservation and not suburban residential – also consider including neighbourhood parks

- Conservation should include a sub-designation for “Sanctuary” Areas” that further restricts public access in order to protect environmental sensitives e.g. bird nesting
 - Include accessibility language in Highway Tourist Recreation Commercial designations
 - Include language requiring adequate trash receptacles in commercial areas
 - Consider taking a position on transport truck parking – either to properly accommodate them to eliminate the current illegal roadside parking issues, or prohibit them by creating more physical barriers (coordinate with MOTI)
 - Expanded commercially designated lands west of the roundabout along Yale Road – is this balanced, or is this commercial corridor too large for the community?
 - Can “Good Neighbour Practices” be expanded to neighbours more broadly instead of limited to a new construction context? (i.e. target non-developers as well)
- c. Comments provided by email from absent team member

AREA D OFFICIAL COMMUNITY PLAN REVIEW TEAM

MEETING NOTES

Date: Thursday, June 13, 2019
Time: 10:30 am – 12:30 pm
Location: FVRD, Meeting Room 224, 45950 Cheam Avenue, Chilliwack, BC

1. Plan Review

a. Section 6 – Local Area Policies

i. General Comments

- Consider incorporating Bridal Falls Uplands as a third neighbourhood “One Community – Three Neighbourhoods”
- Interface conflicts between Agricultural and Suburban Residential uses are inherent without a more gradual transition from agriculture to density

ii. Policy Suggestions

- Clarify “At-ground Design” guidelines and further articulate goal of preserving privacy – consider how prescriptive/restrictive this policy should be
- Incorporate Building Schemes as a preferred method of assuring design guidelines
- Include preference for native species planted within linear parks for longevity
- More flexible timeline considerations for development of Bridal Falls Uplands (less tied to substantial build out of West Popkum)
- Strengthen language for Policy 6.3.1.a.ii – a major or compelling community benefit should be presented as part of any exclusion or boundary review of ALR lands, possibly exceeding legislative requirements

b. Section 7 – Infrastructure and Services

i. General Comments

- Confirm accuracy of current sanitary system capacities as numbers may have changed

- Ensure language pertaining to DCCs is accurate
- General interest in seeing increased police resources in community (through increased officers)
- ii. Policy Suggestions
 - Include Sidewalks as community service requiring capital replacement reserves
 - Noted inconsistent application of FVRD Subdivision and Development Servicing Bylaw – stronger language to ensure enforcement is consistent
 - Consider including policy in support of exploring servicing partnerships with Cheam First Nation
 - Should policy advocating for landowners to limit impervious surfaces contain stronger language to better address on-site storm water management
 - Telecommunications Policy as recommended in Policy 7.8.6 should include requirements that are attainable for telecom companies to achieve in order to successfully establish a project to improve cellular coverage
- c. *Section 8 – Parks and Trails*
 - i. Policy Suggestions
 - Prioritize increased connectivity of existing to new linear trail developments
 - Identify gaps in “parks and trails” at the community level e.g. sports facilities, school site offering community and recreational amenities, dog park or dog friendly parks, parks appealing beyond the “tot lot” demographic – broader appeal
 - Capitalize on opportunity to use SROW lands for recreation and parks
 - Prioritize the following pedestrian/bicycle connections into order to better connect the separated development nodes and expand access to park and rec opportunities, acknowledge investment required, reaffirm that a solution is desired beyond what currently exists :
 - a. East and West connection separate from traffic level roundabout crossing
 - b. North and South connection in West Popkum across Yale Road

AREA D OFFICIAL COMMUNITY PLAN REVIEW TEAM

MEETING NOTES

Date: Thursday, June 20, 2019
Time: 10:30 am – 1:00 pm
Location: FVRD, Meeting Room 224, 45950 Cheam Avenue, Chilliwack, BC

1. Comments forwarded from Dir. Dickey from Popkum Residents Association

- a. There continues to be discussion surrounding the need to identify a school site within Popkum-Bridal Falls – discussion with SD required
- b. Establishing a community/recreation facility within Popkum-Bridal Falls is a priority for the residents

2. Plan Review

- a. *Section 9– Hazard and Risk Management*
 - i. General Comments
 - Given complexity and importance of details covered in this section it may be useful to further clarify the topics covered with less technical language so it can be more easily understood by property owners affected by the hazards discussed
 - Map 2 – Geologic and Stream Hazards is difficult to read and understand, especially at a scale of 11x17 or smaller. Perhaps the legends can be enlarged on the reverse side for easier interpretation
 - West Popkum being generally free of hazards (flood and rock avalanche) presents further rationale for establishing a community centre that could also serve as an evacuation centre during an emergency or hazard event
 - Consideration should be given to more publicly disseminate Policy 9.5.5 annually to residents to further reduce risk of wildfire
 - ii. Policy Suggestions
 - FVRD should support establishing a Fire Hazard Rating/Fire Ban sign at the entrance to the community or near campgrounds to further disseminate

information regarding wildfire risks/venting index to the community and visiting tourists

- Policy language to further empower the Fire Department to issue permits for fires as well as enforcement and fines should be included
- Stronger language is required to emphasize and encourage enforcement of burning restrictions in residential neighbourhoods, especially for illegal burning of garbage and other debris

b. Section 10 – Environment and Resources

i. General Comments

- Consideration should be given to more publicly disseminate information pertaining to Noxious Weeds

ii. Policy Suggestions

- FVRD should pursue increased education and outreach for landowners adjacent to environmentally sensitive areas and for tree retention pursuant to Policy 10.5.2, language should be strengthened
- Should consider policy pertaining to the reduction of greenhouse gases created by illegal burning, encourage responsible burning from residents

c. Section 11 – Development Permit Areas

i. General Considerations

- Vague language in DP guidelines creates difficulties for developers and landowners – the less room for discretion or interpretation the better
- A more proactive approach may be considered to advising property owners affected by DPA 2-D/restrictive covenants of their responsibilities to preserve environment

ii. Policy Suggestions

- DPA 1-D Exemptions: c. “redevelopment or expansion of existing commercial uses that do not include overnight accommodation” – should there be a distinction between a restaurant vs. campground (mobile accomm.) expansion? Is this the best place to draw the line?
- Consequences/Offence language could be strengthened for DPA 2-D
- DPA 4-D should contain language ensuring accessible design (for disability, strollers, elderly, etc.)