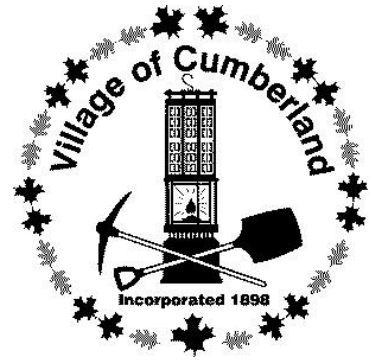


COUNCIL REPORT



REPORT DATE: October 29, 2025
MEETING DATE: November 10, 2025

File No. 5800 – Cumberland Community Forest Park

TO: Mayor and Councillors
FROM: Kevin McPhedran, Director of Community Services
SUBJECT: Cumberland Forest Land Strategy – Memorandum of Understanding and Financial Plan Amendment

RECOMMENDATION

THAT Council approve the *Cumberland Forest Land Strategy Memorandum of Understanding* (MOU) between the Village of Cumberland, Cumberland Community Forest Society (CCFS), United Riders of Cumberland (UROC), and Comox Valley Land Trust (CVLT) as attached to this report dated October 29, 2025 and that this new MOU replace the previously approved MOU for the collaborative development of a Cumberland Community Forest Park management direction statement approved on May 12, 2025; and

THAT Council approve the expenditure of an additional \$9,000, to be funded from the General Asset Renewal Reserve Parks Improvements for a total contribution of \$51,000 to the project and direct staff to bring forward an amendment to the adopted 2025–2029 Financial Plan Bylaw to reflect this expenditure.

PURPOSE

The purpose of this report is to obtain Council authorization to enter into a significantly revised and updated Memorandum of Understanding for “Cumberland Forest” land management planning, including for the Cumberland Community Forest Park, and to approve a financial plan amendment to reflect the Village’s revised funding commitment to the partnership project.

PREVIOUS COUNCIL DIRECTION

Date	Resolution
July 28, 2025 (Closed Session)	Council directed staff to revise the scope of the previously endorsed “Cumberland Community Forest Park Management Direction Statement” planning process, consider further trail planning and infrastructure development in the planning process, support the development of a “Cumberland Forest Land Strategy”, and work with the Cumberland Community Forest Society, United Riders of Cumberland, and Comox Valley Land Trust to revise and update the “Memorandum of Understanding for the Collaborative Development of a Management Direction Statement for the

	Cumberland Community Forest Park” previously adopted on May 12, 2025 to reflect the revised scope.
May 12, 2025	<p>THAT Council enter into a Memorandum of Understanding for collaborative management planning for the Cumberland Community Forest Park with the Comox Valley Land Trust, Cumberland Community Forest Society and United Riders of Cumberland as attached to the report dated May 2 2025;</p> <p>THAT Council direct staff to report back to Council with a draft Management Direction Statement for the Cumberland Community Forest Park to be developed based on the process, roles, responsibilities and schedule described in the Memorandum of Understanding;</p> <p>THAT Council approve a \$37,500 project budget funded by the re-allocation of the \$30,000 previously budgeted for the Arts and Cultural Strategy funded from the Host Community Amenity Reserve and a new \$7,500 allocation funded from the Parks Development Cost Charges Reserve; and</p> <p>THAT Council direct staff to bring forward an amendment to the adopted 2025-2029 Financial Plan Bylaw to reflect these allocations.</p>
May 13, 2024	THAT Council direct staff to initiate the Cumberland Community Forest Park Management Planning process in spring 2024, and report back to Council with a proposed project scope and Financial Plan budget amendment.

BACKGROUND

In May 2025, Council approved entering into a Memorandum of Understanding with the Cumberland Community Forest Society (CCFS), United Riders of Cumberland (UROC) and Comox Valley Land Trust (CVLT) to collaboratively develop a Management Direction Statement for the Cumberland Community Forest Park.

Shortly thereafter, and before the MOU was signed off, the CCFS presented updated land acquisition aspirations to Village Council in a closed session delegation, including a request to expand the scope of the Cumberland Community Forest Park management plan to include additional lands of interest to the CCFS. Some of these lands are currently part of the License Agreement that UROC holds for the management of trails, and are therefore also of high interest to UROC. Following this, in a July closed session, in addition to considering subject matter related to land acquisition and third party confidential information, Council endorsed the concept of expanding the scope of the previously endorsed Cumberland Community Forest (CCF) Park management plan to develop a **Cumberland Forest Land Strategy (CFLS)** and directed staff to work with the parties to that agreement to amend the previously approved MOU. The significantly revised, updated and re-titled MOU in support of this iteration of the project is the subject of this report.

Specifically, the revised MOU reflects the expanded project scope from a Cumberland Community Forest Park-specific management plan to a broader land strategy encompassing the “Middle Earth” parcel (not part of the existing CCF Park but part of a Licence Agreement that UROC currently holds with the private landowner and subject to a current CCFS public campaign to acquire), as well as other lands adjacent to the CCF Park that is of interest to all parties, including

lands of interest to the CCFS and in which UROC also currently holds a License Agreement for trail management.

The MOU reflects the collaborative and at times complex negotiation work that staff have been working on since August to reach agreement on a revised and updated MOU. This MOU serves to formalize the partnership among the Village, CCFS, UROC, and CVLT to jointly develop and implement a 10-year *Cumberland Forest Land Strategy*.

Key components of the MOU include:

- Expanded planning area including the Cumberland Community Forest Park, Middle Earth, and adjacent lands of interest;
- Clear role definitions for each partner including the Village being the project lead and primary liaison with K'òmok's First Nation;
- Commitment to cultural and ecological assessments, in addition to working together to develop other land management goals for topics such as trails and ecological restoration planning;
- A defined project schedule for development of the strategy (2025–2026) and its implementation (2026-2035) and funding structure, including contributions from each partner;
- Public engagement scope; and
- Recognition that the Strategy will serve as the Cumberland Forest Park Management Plan until replaced or updated.

Specifically in regards to consultations with K'òmok's First Nation (KFN), as part of the pre-project planning, in spring 2025 the Village commissioned a Cultural Values Report authored by KFN's consulting archeologist, and supported by KFN Guardians, and Archeological and Ecological Monitors. This report is intended to inform park planning, with further consultations with KFN proposed as part of the strategy development process.

The Cumberland Forest Land Strategy represents a collaborative and forward-looking framework to guide land management, acquisition, conservation, and recreation planning across the Cumberland Forest landscape.

While it is not a typical practice in park planning to also include lands adjacent to the park in management planning scope, the unique situation whereby adjacent lands are currently part of a License Agreement held by UROC that enables public access, but are also proposed for acquisition by CCFS, has created a scenario requiring a creative response in parks planning. Accordingly, staff believe there is merit in considering a broader landscape than just the CCF Park in the planning process - an area informally known as the "Cumberland Forest" - given the CCF Park is heavily influenced by issues and factors outside of the park boundaries. This includes trails planning and development; trailheads and access corridors; and cross property boundary ecosystems.

The development of such a comprehensive strategy will then serve to provide guidance for current and future projects and operations of each of the four parties involved in the MOU.

FINANCIAL IMPLICATIONS

The total project budget is \$78,000, proposed to be funded as follows:

- Village of Cumberland: \$51,000

- Cumberland Community Forest Society: \$22,000
- United Riders of Cumberland: \$4,000
- Comox Valley Land Trust: \$1,000

Council previously approved \$42,000 in budget toward this project (including contingency). An additional \$9,000 is now required to meet the finalized Village contribution of \$51,000 per the MOU (as a result of increased scope). As an outcome of MOU negotiations, the remaining \$26,000 of the \$78,000 budget is proposed to come from contributions each partner. This project budget includes the KFN Cultural Values Report, as well as additional budget allocated for future KFN consultations.

The additional \$9000 in Village funding is proposed to come from the from General Asset Renewal Reserve Park Improvements; by the end of the 2025-2029 Financial Plan, the balance of this reserve is forecasted to be approximately \$26,000; if this expenditure is approved, the forecasted balance of this reserve would decrease to \$17,000.

OPERATIONAL IMPLICATIONS

The project remains a key deliverable in the Community Services 2025–2027 Strategic Workplan. Development of an expanded and more complex strategy will extend the previously forecasted project timeline from completion in summer 2026 to targeted completion in winter 2026-2027. The next Council is then forecasted to receive the final Strategy for approval and implementation.

The project will be directed by the Village’s Director of Community Services with park planning consultant and partner support.

Consideration of Village future resources and capacities will be part of the Strategy development, however, implementation of it will require future Council consideration in annual financial planning processes to fund the implementation of it, including capital project funding and potential parks staffing considerations.

CLIMATE CHANGE IMPLICATIONS

Parkland protection and management provides significant environmental protection benefits as it relates to community resilience from climate change impacts.

ALTERNATIVES

The project was initiated in fall 2024, and as a result of primarily external factors, the pre-planning phase has taken more time than previously forecast by Village staff. Accordingly, in recognition of the opportunity costs of prioritizing this work (e.g. initiation of the Village Park Master Planning process has been delayed), staff have prepared the below alternative options; however, in light of the important progress made with the partners to date in the project, staff are not recommending these alternatives, but believe it prudent that they are presented to Council for consideration of all options.

1. THAT Council not proceed with entering into the revised MOU and scope change in the land management planning area. (I.e. focus on developing the Cumberland Community Forest Management Direction Statement as per previous direction provided on May 12th).

This option may result in minor time savings on the project – estimated to be 1-2 months – but would have the downside of not resolving cross boundary park issues - issues important to community partners – and to the detriment of the “Cumberland Forest” as a landscape.

2. THAT Council rescind approval of the May 2025 MOU, and direct staff to proceed to develop a Management Direction Statement for the Cumberland Community Forest Park without formal involvement of community groups / partners (outside of covenant approval requirements).

A variation of alternative 1 above, but by not formally working with each partner (and instead treating them each as a stakeholder), further time savings on the project could be achieved – estimated to be 2-4 months; downsides of this approach also include not be positioned to resolve cross boundary park issues - issues important to community partners – and to the detriment of the “Cumberland Forest” as a landscape, as well as risks to the Village in partner relations.

3. THAT Council direct staff to pause all work on Cumberland Community Forest Park planning until further notice (and instead shift to initiating the Village Park Master Plan project).

The most drastic of the three alternatives proposed, this option would have the benefit of the Village being able to pivot to initiating the Village Park Master Planning project in Q1 2026; however, the significant downside would be the many issues and risks in the CCF Park - and other issues and risks important to the Village partners in the proposed MOU – would remain unresolved until such time as a land management planning project was revived.

STRATEGIC OBJECTIVE

- ☐ Diverse & Healthy Community
- ☐ Sustainable Service *Delivery* & Asset Management
- ☐ Community Planning

ATTACHMENTS

1. Cumberland Forest Land Strategy – proposed Memorandum of Understanding

CONCURRENCE

None.

Respectfully submitted,

K. McPhedran

Kevin McPhedran
Director of Community Services

M. Mason

Michelle Mason
Chief Administrative Officer



MEMORANDUM OF UNDERSTANDING FOR THE DEVELOPMENT AND IMPLEMENTATION OF A CUMBERLAND FOREST LAND STRATEGY

This Memorandum of Understanding (“MoU”) is effective as of _____, 2025.

AMONG:

The Corporation of Village of Cumberland (“Village”) - municipal government, 2673 DUNSMUIR AVE., BOX 340, CUMBERLAND, B.C., V0R 1S0

AND:

Comox Valley Land Trust (“CVLT”) - a society registered in British Columbia (Registration No. S-39579), 2356 ROSEWALL CRES., BOX 3462 COURTENAY, B.C., V9N 5N5:

AND:

Cumberland Community Forest Society (“CCFS”) - a society registered in British Columbia (Registration No. S-42346), 2715 DUNSMUIR AVE., BOX 1239, CUMBERLAND, B.C., V0R 1S0

AND:

United Riders of Cumberland (“UROC”) – a society registered in British Columbia (Registration No. S-0054471), BOX 960, CUMBERLAND, B.C., V0R 1S0

COLLECTIVELY: “The Parties” or the “Partners”

WHEREAS: the Parties have both independent and overlapping interests in the Lands identified on the map in Appendix A, *“Cumberland Forest Land Strategy Proposed Planning Area, 2025”*, informally known as the “Cumberland Forest” (the “Lands”). See Appendix B. for a summary of these interests.

NOW THEREFORE, in recognition of the mutual interest in the Lands, the parties agree:

- To formally partner to develop and implement a **Cumberland Forest Land Strategy** (the “Strategy”).
- That the Strategy will serve to provide overall guidance and direction in land management decisions until such time as the Strategy is revised and updated or rescinded.
- That the Cumberland Forest Land Strategy will serve as the Cumberland Community Forest Park Management Plan, until such time as the Strategy is revised and updated, or an independent Park Management Plan has been completed,

Under the following terms:

1. PURPOSE

This MOU is intended to outline the terms of the partnership to develop and implement a Cumberland Forest Land Strategy, including the roles and responsibilities of each party, and the overall scope of the Strategy and the planning process to develop it.

2. TERM

2.1 The MOU will remain in effect for:

2.1.1 Phase I - Strategy Development: until each party has formally adopted the Cumberland Forest Land Strategy via their internal approvals process, including approval authorities and rights as defined in section 219 covenants subject to certain properties within the Lands; and

2.1.2 Phase II – Strategy Implementation: for the duration of the implementation of the Strategy, estimated timeline: 10 years (to 2036).

2.2 The Parties agree that the adopted Strategy will include specific content on future partnership and collaboration opportunities in the implementation of objectives and actions described in it.

2.3 The Parties agree to formally review the MOU and the terms of the partnership within five years of signing (on or before December 31, 2030)

3. SCOPE

3.1. The Strategy will focus on the lands that currently form the Cumberland Community Forest Park and the two informal parcels proposed for future purchase and protection by the Cumberland Community Forest Society to the east and the west of the current Cumberland Community Forest Park. Further, the Strategy will also consider adjacent lands identified as being of high interest in the management of certain issues and amenities relevant to, and under the management purview of the Parties, the “Cumberland Forest”, including: Coal Creek Historic Park, Village Park and other areas as outlined in the dashed line on the map in Appendix A

3.2. The Strategy will consider the history of the lands; land values and permitted uses per previous agreements (including the [Section 219 Covenants on the Cumberland Community Forest Park](#) and UROC Licence Agreements with private landowners); land management issues and opportunities; management objectives and strategies; and an implementation action plan (including opportunities for future partnerships and collaborations).

4. FUTURE LAND OWNERSHIP AND MANAGEMENT

4.1 The Parties recognize that the Strategy will inform future Village of Cumberland decisions related to the acquisition, ownership, and management of lands proposed for purchased by the CCFS to the east and the west of the current Cumberland Community Forest Park

4.2 The Parties recognize that by entering into this agreement, the Village is under no obligation to acquire any lands outside of the existing Cumberland Community Forest Park.

4.3 The Parties recognize that the Strategy will inform collaborative landscape scale planning and decision-making on the subject lands in support of agreed upon objectives in the strategy.

4 ROLES

- 5.1 The Village of Cumberland will act in the lead role in the development of the Strategy, including, but not limited to:
- 5.1.1 Leading the development of this MOU;
 - 5.1.2 Overall project management and coordination of the development of the Strategy, including securing the services of a parks and land management planning consultant to support the planning process and document drafting, as well as technical services in support of the document (e.g. mapping and graphics), as required;
 - 5.1.3 Project budget management;
 - 5.1.4 Drafting and coordination of any group communications for public issuance by the Parties; and
 - 5.1.5 Acting as the primary liaison between the parties and K'òmoks First Nation (KFN) on issues and engagement related specifically to the development of the Strategy, including commissioning a Cultural Values Assessment by KFN to inform management planning for the Lands.
 - 5.1.6 Obtaining approval of the Strategy, as per internal processes.
- 5.2 The Cumberland Community Forest Society and the United Riders of Cumberland will act in a primary supporting role in the project, including:
- 5.2.1 participating in all planning functions including written (primarily email) correspondence, meetings, workshops and public engagement sessions;
 - 5.2.2 coordinating input from internal society stakeholders, including elected board members, members, donors and others, as determined by the Societies at their own discretion;
 - 5.3.3 disseminating group communications;
 - 5.3.4 supporting the Village in formal engagement with KFN;
 - 5.3.5 obtaining approval of the Strategy, as per internal processes.
- 5.3 In addition to the above, the Cumberland Community Forest Society, will commission an Ecological Inventory Report for the Lands by a Registered Professional Biologist that describes the ecological and anthropogenic features of the Lands. The Report will be used to support the development of Park/Land management zones in the Strategy, as well as long-term monitoring.
- 5.4 The Comox Valley Land Trust will act in a secondary supporting role in the project, participating at their own discretion in the planning process in order to best inform their final review of the Strategy in their formal approval authority role for the Management Plan requirement of the section 2019 covenants on the properties that form the Cumberland Community Forest Park, including representing other covenant holders (such as the Comox Valley Regional District and The Land Conservancy, as applicable.)

5 STRATEGY DEVELOPMENT PROCESS AND PROJECT SCHEDULE

PHASE/TASK		TIMELINE
1	Project Initiation and Engagement Strategy Planning	Spring / Summer 2025
2	Partner Engagement Session #1	June 2025 (complete)
3	Project Press Release (Public Engagement #1)	Winter 2025/ 2026
4	Partner Engagement Session #2	Winter 2025 / 2026
5	Draft Land Strategy Framework	Spring 2026
6	Partner Engagement Session #3	Spring 2026
7	Open House to Present Draft Strategy (Public Engagement #4)	Summer 2026
8.	Draft Land Strategy Presented to council	Fall 2026
8	Final Land Strategy, including adoption	Winter 2026 / 2027

6 PROJECT BUDGET AND FUNDING

7.1 Project Budget

The overall budget for the project is \$78,000. This includes all consulting fees and expenses (including in support of the development of the MOU, drafting and development of the Strategy and partner, public and KFN engagement scope); Ecological Baseline Inventory Assessment (completed by a Registered Professional Biologist commissioned by CCFS valued at \$15,000), technical mapping support; the KFN Cultural Values Assessment, and project contingencies.

7.2 Cost Sharing

The Parties agree to contribute to the project in the following amounts:

Village of Cumberland:	\$51,000
Cumberland Community Forest Society:	\$22,000
United Riders of Cumberland	\$4000
Comox Valley Land Trust:	\$1000

7.3 The Village will retain any outstanding funds remaining at the completion of the project, should contingencies not be required.

7.4 The Village will invoice UROC and the CVLT in the amount outlined in 7.2 before December 31, 2025.

7.5 The Village will invoice the CCFS for \$7000 before December 31, 2025

7.5 The Village agrees to share project expense tracking records with the parties upon request at any time.

7 CONTACTS

Village of Cumberland –	Kevin McPhedran Director of Community Services
Cumberland Community Forest Society –	Meaghan Cursons, Executive Director
United Riders of Cumberland –	Dougal Browne, Executive Director
Comox Valley Land Trust –	Tim Ennis, Executive Director

SIGNATURES

The Village of Cumberland, by its authorized signatories:

Comox Valley Land Trust, by its authorized signatories:

Cumberland Community Forest Society, by its authorized signatories:

United Riders of Cumberland, by its authorized signatories:

Appendix A – Map Cumberland Forest Land Strategy Proposed Planning Area, 2025



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- C. The Lands are within the Unceded Traditional Territory of the K'ómoks First Nation (KFN), the traditional keepers of this land and contain cultural values and may contain archeological values of significance to KFN.
- D. Three Section 219, *Land Title Act* covenants exist on title for the properties that make up the Park, registered in 2005, 2006 and 2020; each covenant requires the development and adoption of a park management plan.
- E. The Covenant on the lands identifies primary values of importance for protection, as follows:
 - I. The Park contains significant ecological values, including flora, fauna, and natural features.
 - II. The Park contains significant cultural and heritage values.
 - III. The Park contains significant recreational values.
 - IV. The Park contains significant utilities, including drinking water supply infrastructure and associated access roads.
 - V. The Park protects community drinking water quality objectives.
 - VI. The Park contains fish habitat, including opportunities for future fish habitat restoration works.
- F. The CVLT is the primary covenant holder for each of the 2005, 2006 and 2020 covenants, and in this role, has provided the Village with management guidance, feedback and project approvals related to the Park. Further, the CVLT is obligated to formally represent secondary Covenant Holders as follows: The Land Conservancy of B.C. (2005 and 2006 Covenants) and The Comox Valley Regional District (2020 Covenant) in management planning.
- G. The CCFS has been fundamental in fundraising for parkland acquisition since 2000 and supporting the successful management of the Park to date. In addition to being the community covenant holder for the 2020 covenant applied to the 2016 and 2020 acquisitions, the CCFS has:
 - I. Provided leadership in the securement of funding, negotiation of purchase agreements and management of acquisitions processes for all lands that now form the Park; and
 - II. Secured resources to support educator and school outreach, research, and assessments within the park; and
 - III. In partnership with the Village, lead the successful completion of select park improvement and restoration projects.
 - IV. Developed a 2024-2028 Strategic Plan referencing several topics and projects of interest to the trail's community and Cumberland Forest land management planning.
 - V. Aspires to purchase lands adjacent to the park for the purpose of parkland protection.
- H. The UROC has been fundamental to the establishment of the Cumberland Trail Network; the non motorized trails in the Park are part of this network and act as the primary point of access and egress to the Access Agreement Areas beyond Park boundaries. The UROC has held formal trail management responsibility for the majority of the trail network located on private forest lands since 2015. Further
 - I. In the 2022 Memorandum of Understanding for Access, Collaborative Management, and Use of a Cumberland Trail Network, the Village and UROC agree to coordinate trail

management with other landowners, and to work collaboratively on trail network planning.

- II. The UROC's 2022 Trail Strategic Plan references several topics and projects of interest to CCFP management planning; and
 - III. The UROC provides contracted trail maintenance services for trails in the Park under the 2023-2027 Community Services Partnership Agreement with the Village, while has also made additional contributions to other park trail improvement projects.
-
- I. The CCFS has expressed interest in participating in strategic planning for the Cumberland Trail Network.
 - J. UROC has expressed interest in participating in strategic planning on matters relating to Cumberland Forest ecosystem health, restoration, and conservation.

Appendix C – Definitions

- a. **Access Agreement Areas** - private forest lands adjacent to the park accessed through agreements between the UROC and private timber companies.
- b. **Biodiversity Protection Zone** - is mapped in the baseline documentation report and describes the Land and the Amenities in the form of text, maps, photographs and other records of the Land and the Amenities as of the date of registration of the Covenant attached as Schedule B, available at <https://cumberland.ca/wp-content/uploads/2025/01/CCFS-Covenant-VS-21-Aug24-2020.pdf>;
- c. **Coal Creek Historic Park** - the Village of Cumberland municipal park adjacent to the Park and the location of the historic Chinese-Canadian and Japanese-Canadian town sites.
- d. **Comox Valley Land Trust (CVLT)** - a regional land trust and co-covenant holder for the CCFP. The CVLT is designated as the Primary Covenant Holder and is responsible for monitoring compliance with the covenants which it does annually, and for taking enforcement actions in the case of a breach of the covenants. CVLT has parks management plan approval authority, and any activity the Village intends to undertake that is expressly restricted by any of the covenants requires the prior written approval of the CVLT in its sole discretion.
- e. **Comox Valley Regional District (CVRD)** - local regional district and co-covenant holder for the Space Nugget and Perseverance parcels. The CVRD has parks management plan approval authority for activities within the defined Watershed Protection Zone.
- f. **Covenant** - the Agreement between the Village of Cumberland, Comox Valley Land Trust, Comox Valley Regional District, and Cumberland Community Forest Society, an example available online at <https://cumberland.ca/wp-content/uploads/2025/01/CCFS-Covenant-VS-21-Aug24-2020.pdf>
- g. **Cumberland Community Forest Park (CCFP)** - the 200-hectare public park purchased with funds raised by the Cumberland Community Forest Society and owned and managed by the Village of Cumberland.
- h. **Cumberland Trail Network** - general name used for the trail network adjacent to the village including both Access Agreement Areas and the Cumberland Community Forest Park
- i. **Cumberland Community Forest Society (CCFS)** – a non-profit organization that raised funds for the purchase and negotiated the conservation covenants for the CCFP. The CCFS is a co-covenant holder for the “Space Nugget” and “Perseverance” parcels, acquired in 2016 and 2020, respectively, and has parks management plan approval authority.
- j. **K’òmoks First Nation (KFN)** – “Care takers of the ‘land of plenty’ since time immemorial”. This land of plenty includes the Park and is part of the KFN’s unceded traditional territory.
- k. **The Public** means Park users focused on local residents and organizations with an interest in the Park.
- l. **United Riders of Cumberland (UROC)** - a local mountain biking advocacy and trail management organization that manages the trails in the Access Agreement Area and provides contracted trail services to the Village of Cumberland for trail maintenance work in the CCFP.
- m. **Village Watershed Lands** -230 hectares of forested land owned by the Village of Cumberland in the upper Perseverance and Cumberland Creek watersheds. Primary land management

objectives are for the protection for community drinking water resources; secondary objectives include managing for low impact trail-based recreation.

- n. **Village of Cumberland** -an incorporated municipality of approximately 4500 residents, governed by the Province of BC Community Charter, and in which delivers a parks service to the benefit of its residents.
- o. **Watershed Protection Zone** means the 30 meters from the high-water mark of any waterbody or watercourse on the Land which drains into Comox Lake as defined in the Covenant.