

From: Gerry Kristianson [REDACTED]
Sent: Thursday, October 21, 2021 1:04 PM
To: Islands2050
Cc: Secretary, PIID
Subject: Islands Trust new Draft Bylaw No 180 - Policy Statement

As a long-time permanent resident, and on behalf of my family, which owns three lots on Piers Island, I wish to offer the following comments on the draft policy document circulated by the Trust. I look forward to the time when Trust representatives from Salt Spring can visit Piers to discuss these issues with the community.

Freshwater Stewardship: In section 4.2.6, under the heading of Directive Policies for Freshwater Stewardship, the document reiterates a previous assertion that official community plans shall ensure that islands be “self-sufficient in their supply of freshwater”. It adds in a footnote “with the sole exception of Piers Island which is already piped into the Capital Regional District water supply.” We are grateful for this acknowledgement that Piers was made exempt from an earlier attempt by the Trust to force us to sever our connection with the CRD system. However, we should note that we created the connection to North Saanich because the groundwater available on a small island like Piers was insufficient and costly to provide at the required level of quality. We suspect that also is the case on other small islands. In this context we have to question the suitability of the proposed ban on desalination as an alternative.

Forest Management: Section 4.3.4 proposes a new policy “that management plans related to sustainable forest harvesting in the Trust Area should include appropriate monitoring and evaluation mechanisms to uphold the long-term environmental integrity of forest ecosystems, and should preserve and protect the inherent rights of First Nations to harvest forest resources for cultural purposes.” It will be helpful to have clarification of the relevance of this statement to management by the Piers Island Association of the 150 acres of land which it holds on behalf of the adjacent private property owners.

Seawalls: Under the heading of Coastal and Marine Stewardship Policies, Section 4.6.7 proposes that “seawalls and other hard shoreline armoring should not be developed.” This seems a harsh and inconsiderate provision for properties on an island like Piers that must contend with the repetitive passage of ferries and their attendant wake. A subsequent section (4.6.10) calls on the Trust to ensure that “structures” (like seawalls?) do not “interfere with natural coastal processes” while (4.6.15) urges regulators to “consider the current and anticipated impacts of sea level rise and determine shoreline buffers and setbacks accordingly.” Does the Trust believe that ferry wake is a “natural coastal process”? Are there to be retroactive setback requirements for properties that are forbidden seawall protection?

Docks: Another paragraph in section 4.5.7 says that “private docks should be limited to boat access only properties.” This is supported in Section 4.6.14 by a proposed rule that would “prohibit private docks except where properties are boat access only.” We look forward to confirmation that properties on Piers are defined as boat access only.

Public Access: Section 6.1.6 seems to have potential implications for Piers. It says that “there should be public access on each island in the Trust Area to beaches and areas of recreational significance.” From

the Trust's point of view, Is the common land held by the PIA an area of "recreational significance" to which there must be "public access"?

Climate Change and Forest Management: A new policy with possible relevance to our island's forest management policy is in section 6.1.20 which says the Trust is to "identify means to reduce the climate vulnerability of communities by prioritizing ...protection of the carbon capture and storage capacity of natural areas". Would adoption of this policy affect the current community rules with respect to the harvesting of firewood from PIA or private land on Piers Island?

Short Term Rentals: A new section 6.2.5 directs that Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, "identify and assess the impacts of short term rentals of residential dwellings on the availability of safe, secure, and affordable housing in their planning area and, where necessary, regulate and limit the number of short term rentals accordingly." The current Piers Island community plan defines and restricts such rentals and does not allow permanent occupation of auxiliary guest cottages. Would this bylaw be in conflict with the proposed new policy?

Indigenous Housing: An interesting element of the new policy document is found in Section 6.2.8. The Trust Council is to "advocate to property owners" the need to "foster safe, secure and affordable housing for Indigenous Peoples in the Trust Area." How does the Trust propose to apply this advocacy to property owners on Piers, the largest of which is the PIA which holds 150 acres of common property on the basis that it cannot be developed or subdivided? .

Transportation Policy: A new section 6.3.1 states that the "Trust Council holds that community sustainability and resilience are supported by appropriately situated public and active transportation networks that serve to reduce greenhouse gas emissions and promote health and well-being." This could be read as obliging the Trust to support efforts to secure a subsidy for the privately operated shuttle that operates between the island and Swartz Bay, thereby reducing emissions related to the use of private vessels. Section 6.3.10 says the Trust Council "shall advocate to provincial government agencies in support of the electrification of ferries in the Trust Area." Can we expect the Trust to advocate for an electrified shuttle to Piers?

Waste Disposal: Section 6.4.1 of the document states that "It is Trust Council's policy that it is acceptable for waste originating in the Trust Area to be safely disposed of within the Trust Area." While it goes on to make clear that this does not mean disposal of hazardous or industrial waste, and that there should be only "minimal burning of solid waste", we are told in section 6.4.4. that our official community plan should be amended to "identify acceptable locations for the disposal of solid waste." The Piers Island Improvement District closed our one solid waste disposal site many years ago and the community has been diligent in its efforts to reuse and recycle, and to make responsible use of the CRD's Hartland Landfill. Selection of a new disposal location is likely to prompt a vigorous debate, or is it proposed that Piers Island garbage should be transported to Salt Spring so that it remains within the "Trust Area"?

Gerry Kristianson



Piers Island