

RE: **Islands Trust DRAFT OCP, 2026**

Comments (public feedback) from Howard Bashaw, Gabriola resident

Preliminary

It is clear that an enormous amount of time and energy went into the current OCP Draft. Its comprehensive scope, transparent organization and straightforward presentation make it a remarkably helpful document. I offer a big 'thank you' to all those involved.

In providing feedback to the Draft, one could address any number of topics. I will focus on only two: the word 'should' and Gabriola water.

1) Use of the word 'Should'

Even though this particular 'should' topic is addressed in the posted FAQ, I still feel it necessary to offer comments with the hope that many 'shoulds' will lean more toward, or actually become, 'musts'. The IT explanation for the use of 'should' is that it reflects 'desired direction' and that there is a bigger, limiting context at play. Nevertheless, it really seems that 'desired direction' should, in many cases, be better focused as, and understood as, mandated direction.

Moreover, on the face of it, it does seem contradictory that - to a certain extent at least - a policy statement (*per se*) even allows for the interpretive flexibility that will invariably arise with the word 'should'; with one possible result here being an increase in regulation side-stepping (if there are those so inclined ...).

One example: should actions or steps now needed to meaningfully protect and preserve the natural environment and groundwater resources be anchored or facilitated by the word 'should'? These actions must, wherever possible, be based on inflexible terminology such as 'can' or 'cannot', or 'must' or 'must not'.

Another example (**OCP page 53 / Guidelines 2.8.1.4 (1-9)**):

Of the nine guidelines presented here, only two (nos. 4 and 9) use the assertive term 'must'; either 'should' and 'may' are used in the remaining 7 guidelines. I have some difficulty in understanding why or how the passive 'should' is appropriate in this particular topic area. Consider **2.8.1.4.2** "The applicant should provide evidence that ..." Why not: "Upon demand, the applicant *must* provide evidence that the required ..." And so on.

Becoming a story of two 'shoulds'?

Maybe a substantial number of 'shoulds' could be marked (asterisked, or whatever) to indicate that a second-layer of desired direction is also at hand. Hypothetically: for those so marked, IT has set itself the goal of eventually converting 'shoulds' into 'musts' (or equivalents); the reader thereby understands that (1) not all 'shoulds' are equally passive, (2) there is an underlying view as to where certain Policy and Guideline statements really need to go, and (3) work is either upcoming or in progress on strengthening certain policy and guideline statements.

It is my guess these marked, dual 'shoulds' would likely be appreciated by many readers.

2) Water

To be clear at the onset, the following statement is just my opinion (but one probably shared by a number of others): while groundwater is, and will continue to be, an essential resource, the way forward for achieving long-term water sustainability could have as much to do with rainwater harvesting as it does with groundwater wells and well-water management.

For sure, the OCP Draft does include important topics related to rainwater harvesting and cistern storage (great!), but I would like to see an increased emphasis on this topic area. If Gabriola aquifers do decline more rapidly than might be expected, it follows that the need to *ensure* freshwater availability from sources other than groundwater will rise proportionally.

OCP page 9 / 1.2.5. Groundwater Resources

The topic here is groundwater, so why would - or should - rainwater harvesting be mentioned in this introductory section? Here's why:

Paragraph 2 "Groundwater is the primary source of freshwater for most properties..." I do not question the above; but for Gabriola surely there is room for additional, key information.

How many of these 'most properties' that are equipped with wells:

1. have dual water systems: both well and rainwater?
2. also require regularly (or seasonally) delivered water?
3. have failing wells in dry, summer months?
4. have failing wells that gradually yield less overall in each passing year?

So, although groundwater is the primary source of freshwater, it might not be the primary source all year around for some (or for many?) - I could imagine the paragraph including an additional sentence: *The availability of groundwater can, however, in certain areas be variable in especially dry seasons; wells can and do fail, resulting in situations where freshwater must come from alternate sources such as rainwater harvesting and/or delivered water.*

(Note: strictly speaking, the above likely qualifies as hearsay and therefore probably disqualifies itself for inclusion; but - and really, who hasn't heard about wells running dry - both sooner and more often - on Gabriola? Is reliable, documented information on wells that are active, yet annually fail, actually available? Those in the water delivery business will surely have very good awareness of increased water demands, failing wells, and which geographic areas on Gabriola are most susceptible.) Anyway, the above can be seen to link directly to:

OCP page 27 / Policy 2.3.2.3

Yes! Hooray.

OCP page 85 / Supports and Advocacy

Rainwater harvesting is included the list. Perfect! Perhaps this could be expanded a little with emphasis on the importance of RDN Well Smart and Rainwater Harvesting workshops, and the possibility of these being offered on an yearly or two-year alternating cycle. I suppose this falls in the category of advocacy for programs - but where details of the sort just mentioned nevertheless likely fall outside the OCP. But, I think advocacy for maintaining an open, ongoing connection with RDN - especially with regard to the key topics of well-water and rainwater harvesting - is vital.