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Sent: Thursday, July 16, 2026 10:57 AM

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Subject: Additional points for OCP discussion for the July 16th LTC meeting

To be added to the OCP discussion at the LTC meeting today.

To the Trustees and Gabriola Local Trust.

There is no discussion in the project Charter Review (phase 3) Appendix on the following critical issues and we request changes to the OCP project be made. The Draft does not focus on the protection of fully functioning ecosystems, the natural environment biodiversity and instead mostly concerns itself with density increases. To address this oversight, changes to the project Charter maybe necessary.

Additional OCP discussion points that have not been included in the appendix:

1. The Provincial legislative regulations do not identify or acknowledge the uniqueness of the Islands.
2. Freshwater sustainability (2.4.2.9.3) requiring all *new residential, commercial, institutional developments to incorporate cisterns for the collection of rainfall...* And, *where it is not intended for property owners to fill these cisterns with water trucked to the island*, is not well thought out. This policy ignores the mathematics (average occupancy, average precipitation, average water consumption and average roof size). Do you have any idea of the size of the roof that is necessary and the number of cisterns that would be required by a 2person home for a 6-8 months period. Plus, if affordability is the goal cistern systems are very costly to install and maintain.
3. Gabriola's groundwater supply is finite and with the increasing demand being placed on it from density increase and as a result of longer drier summers we have to import water. The island groundwater supply cannot provide the extra 15 million liters a year that is currently being hauled to its residents and this year, it will likely be more as the dry season has started earlier and will be longer.
4. Any notion of "Flexible Housing" (policies 2.4.2.2-5) needs to provide assurances that adjacent properties will not be affected by loss of groundwater and contamination by effluence: and, should this occur it needs to made clear in the OCP who is legally responsible for damages, the Trust or new property Owners? What evidence does the Trust have that these policies and zoning changes will reduce housing costs: and what due diligence will be applied by Trustees to assure the public that this will solve the perceived housing shortage?
5. "Flexible Housing" is market housing and does not fit with the multi-density policies of affordable non-market housing for seniors and low-income residents. This is just another way to add even more densities to the struggling island ecosystem.
6. The Freshwater Footprint recommends basic planning to ensure growth to be in line with what the islands water can support. High to severe Hazard areas call for more caution or stronger requirements. For instance, the Village is a severe water stressed area according to GW Solutions but in the draft OCP there is no acknowledgement that *high to extreme FF hazard areas* cannot **support any additional growth**. In fact, there is no discussion on zoning to limit growth at all in the OCP for this area or any other Freshwater Hazard areas.
7. Without more stringent terms we will not be able to sustain a healthy environment. **"Must "**, according to the review is only used in Provincial mandatory and regulatory

processes. "Shall" provides inadequate protection for critical zoning and policies. If "must" cannot be used in the OCP, then the term ***ensure* would guarantee a specific outcome and is a stronger term to use when drafting the new mandatory obligations** to protect Gabiola's sensitive ecosystems and threatened groundwater.

To conclude, I ask why **growth limits** are not being considered and discussed. Where in the Trust Act or Charter does it say that growth limits cannot be enacted to protect and sustain the island's delicate and unique ecosystems, forests and water supply?