

To: Local Trust Committee (LTC), Gabriola Island Trust Area

Subject: Formal Submission Regarding Draft Official Community Plan (OCP) Review — General Deficiencies, Multi-Agency Co-Governance, and the Water Neutrality Framework

SECTION 1: GENERAL DEFICIENCIES OF THE DRAFT OCP

Across the Vision, goals, and targets comprising the draft Official Community Plan (OCP), there is a complete absence of quantifiable metrics, baseline stress indicators, and time-based priorities. While the draft highlights the urgent need for ecosystem stewardship, it fails to identify which specific elements of Gabriola's natural environment are under stress, the degree of that stress, or how these ecological realities are projected to change by 2050.

Furthermore, while the draft references the Trust Policy Statement mandate, it provides no clear definition of what is worthy of preservation, nor how that protection will be operationalized over the planning horizon. Key strategic relationships and initiatives are left equally vague: collaboration with the Snuneymuxw First Nation lacks a practical timeline or implementation roadmap, criteria for equitable housing access remain unstated, and open-ended projections for "diverse, accessible, and affordable housing options" are provided without establishing overall density ceilings over time.

Statutorily, the plan relies on passive population projections to the exclusion of community-defined growth limits and local carrying capacity. While the local planning framework requires map designations specifying the approximate location, amount, type, and density of residential development to meet anticipated needs over at least a 20-year period, these explicit specifications are absent. Equally missing are concrete targets for the reduction of greenhouse gas emissions and the actionable measures proposed to achieve them.

SECTION 2: THE GOVERNANCE BRIDGE — BRIDGING GENERAL SHORTCOMINGS TO ACTIONABLE SOLUTIONS

These structural deficiencies are not isolated flaws; they are the direct symptom of **institutional fragmentation**. Currently, decision-making on Gabriola is fractured across separate jurisdictional silos: the LTC regulates land use, the Regional District of Nanaimo (RDN) manages services, Island Health regulates potable safety, the Ministry of Transportation and Infrastructure (MOTT) dictates subdivision approvals and roadside drainage, and the Snuneymuxw First Nation holds unceded territorial rights and inherent water stewardship authority.

To cure both the accountability deficit and the institutional paralysis, the OCP must mandate the creation of a formal **Gabriola Water Stewardship Table**, adapting the proven

co-governance model established by the **Cowichan Watershed Board** under the statutory framework of the *BC Water Sustainability Act* (WSA).

GABRIOLA WATER STEWARDSHIP TABLE

(Co-Governance & Public Trust)

LTC	RDN	ISLAND HEALTH	SNUNEYMUXW	MOTT	COMMUNITY HYDROLOGISTS
landuse & zoning	waste & safety	potable & rights	stewardship	subdivision approval & oversight	community education & data

The Stewardship Table serves as the exact operational engine required to resolve the OCP's broader gaps through three fundamental benefits:

1. Aligning Fragmented Authorities & MOTT Subdivision Approvals

As the formal Approving Authority for land subdivision, MOTT's decisions heavily influence parcel creation, surface runoff, and aquifer recharge—yet its processes are frequently perceived as remote and disconnected from local land-use planning. Bringing MOTT, the RDN, Island Health, and the LTC to a shared Table creates direct operational alignment, ensuring provincial subdivision sign-offs and road drainage management comply with local water-neutral servicing standards.

2. Eliminating Administrative Overhead & Political Friction

Vague policies without measurable targets do not create flexibility; they create administrative drag. In the absence of objective quantitative thresholds, every development proposal that impacts community rights or obligations devolves into an open-ended, highly charged political debate before the LTC. Establishing clear, time-based targets through the Table streamlines application reviews, reduces legal costs, protects Trustees from ad-hoc political pressure, and restores community trust in consistent governance.

3. Operationalizing True Co-Governance & Science-Based Carrying Capacity

Drawing on the Cowichan Watershed Board model enabled by the *Water Sustainability Act*, the Table elevates the Snuneymuxw First Nation from passive stakeholders to equal co-governing partners. By linking real-time hydrogeological monitoring directly to land-use decisions, the Table replaces speculative population growth with an empirical ecological

ceiling—ensuring density caps, cluster housing evaluations, and canopy protection targets (such as Coastal Douglas-fir and wetland preservation) are directly anchored in proven water availability.

SECTION 3: THE CORE MANDATE — ISLAND-WIDE WATER NEUTRALITY

Once this multi-jurisdictional Table is established, its foundational policy objective becomes clear: managing Gabriola as a **single, continuous hydrogeological commons** through an island-wide commitment to **Water Neutrality**.

OCP Statutory Policy Provisions

1. **Island-Wide Groundwater Protection DPA:** Designating the entire island as a Development Permit Area requiring applicants to prove zero net increase in groundwater extraction.
2. **Mandatory Rainwater Catchment:** Establishing policy requiring all new construction and footprint expansions to rely on independent rainwater harvesting systems for potable and non-potable needs, prohibiting new well drilling for expanded density.
3. **Subdivision Servicing Bylaw (LGA Section 506):** Amending servicing regulations pursuant to Section 506 of the *Local Government Act* to mandate self-sufficient rainwater systems as a condition of subdivision approval.
4. **Development Approval Information (DAI) Bylaw:** Shifting the burden of proof to applicants, requiring independent, peer-reviewed hydrogeological assessments before applications are processed.

Land Use Bylaw (LUB) Implementation

- **Storage Minimums:** Establishing mandatory minimum cistern capacities (e.g., 30,000–45,000+ liters) tied to building footprint and occupancy.
- **Impervious Surface Ratios:** Replacing static lot coverage with maximum impervious surface caps and mandatory permeable paving to maximize localized recharge.
- **Non-Potable Restrictions & Incentives:** Restricting groundwater use for cosmetic irrigation, while granting automatic setback exemptions for water storage tanks to encourage voluntary retrofits.