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Dear Narissa and Stephen,

RE: Gabriola Island Official Community Plan

Thank you for the companion document and the opportunity to provide comments on the Official Community Plan (OCP). The updated OCP demonstrates a thoughtful response to key challenges facing Gabriola Island, including demographic shifts, climate change, housing affordability, environmental health impacts, and the interests of First Nations.

The BCCDC's *Healthy Built Environment Linkages Toolkit (HBE Toolkit)*¹ and the BC Ministry of Housing's *Complete Communities Guide (CCG)*² provide evidence-based guidance for community planning that supports planetary health, climate resilience, and equitable population health outcomes. These frameworks have informed the comments below.

Natural Environments and Resource Stewardship:

Groundwater resources identified in the *Freshwater Footprint Study*³ are highly vulnerable to climate change, making aquifer protection and its influence on land-based decisions an important focus of Section 2.2.2, Objectives 2.2.3.1 and 2.2.3.3, and Policy Actions 4.4.2 and 4.4.3. Recognizing these risks strengthen the OCP, as protecting water supports a sustainable water supply, healthy aquatic ecosystems, and shared responsibility with water stewardship^{3,4}.

While there is strong emphasis on water protection, it does not clearly establish performance measures to track progress, evaluate effectiveness, or guide adaptive management. Additional objectives addressing ecosystem health and natural landscape preservation would strengthen accountability and long-term resilience. Indicators related to soil health, air quality, and pollinator populations are well-correlated with biodiversity and ecosystem health.¹ Incorporating these objectives would improve monitoring, inform adaptive management, and support protection of the natural environments.

Recommendations:

- Include an objective in Section 2.2.3 to enhance groundwater infiltration for improved water quality and aquifer recharge by promoting nature-based solutions, such as permeable paving, rain gardens, and bioswales.

- Incorporate an objective in Section 2.2.3 to develop a soil management plan that prioritizes preservation of native soil structure and quality to support biodiversity and climate resilience. Preserving native soils also helps preventing erosion, improve groundwater filtration, and provide habitat for a range of species.⁵
- Include an objective in Section 2.2.3 or action under Policy Action 4.4.3.1 to establish responsible water stewardship bylaws and visitor messaging that reduce pressure on the aquifers.
- Add ecosystem health indicators to Policy Action 4.4.2.1 to track environmental performance and inform adaptive management.

Recreation and Community Spaces:

The OCP recognizes that natural environments support long-term social and physical wellbeing, as reflected in the overall goal of Section 2.2.3, Objective 2.2.3.3, and Policy Actions 4.4.5.3 and 4.4.5.5. This is a strength of the OCP, as it acknowledges the contribution of parks, beaches, shorelines, and natural spaces for recreation, social connection, and community wellbeing.¹ These policy statements also align well with the HBE Toolkit, which identifies access to parks and green spaces as a key factor in promoting physical activity, reducing chronic disease, and strengthening social cohesion.¹

However, the OCP does not explicitly address equitable access or safety within recreational spaces. Barriers related to mobility, location, and socio-economic factors may limit access for some residents. The OCP also contains no objectives or guidance on safe environmental design or falls prevention despite promoting public access to beaches and recreational areas. Evidence also shows that most drownings occur in unpatrolled or unsafe locations⁶. Addressing these gaps would help ensure recreational spaces are safe, accessible, and inclusive for people of all ages and abilities, while reducing barriers and improving public safety.

Recommendations:

- Consider incorporating diversity, equity, and inclusion (DEI) principles into the Section 2.2.3 goal statement by stating “ensure all residents have equitable and safe access to healthy natural environments, green spaces, shorelines, and ecosystem services regardless of their income, cultural identity, age, mobility, and location on the island.”
- Enhance Policy Action 4.4.5.3 to improve access to parks, beaches, recreation, and community spaces through affordable, sustainable mobility options, such as connected trail networks and active transportation. Improved transportation can reduce socio-economic barriers and enable more residents to benefit from nature.¹
- Strengthen Policy 2.5.1.5.4 by incorporating safety considerations for public waterfront and park access, including designated swimming areas and separation from hazards such as boating zones.

Agriculture and Food Systems:

Resilient local food systems are essential for supporting affordable, healthy food options^{1,2}. These principles are reflected in objectives under Section 2.2.3 and policies under Sections 4.4.3.2 and 4.4.4.4. The OCP demonstrates a strong commitment to protecting agricultural land, promoting local food production, and supporting community-based initiatives. These approaches can strengthen food security, support the local economy, and increase access to diverse, healthy food options¹.

However, the OCP does not explicitly address equitable access to healthy food nor Indigenous food sovereignty. For example, the HBE Toolkit and Complete Communities Guide emphasize the importance

of locating healthy food retail within walkable, active transportation networks (e.g., within 800 meters of a grocery store)^{1,2}. This perspective is missing in the OCP. Addressing these gaps, as well as Indigenous food sovereignty, would improve access for residents facing transportation, financial, or cultural barriers to food and waters that promotes health and well-being¹

Recommendations:

- Prioritize healthy food retail and other food assets in locations accessible by active transportation under Policy Action 4.4.4.4 to improve equitable access.
- Add a food sovereignty objective to Section 2.2.3 that supports protection of First Nations' traditional food lands, stewardship, and harvesting practices.
- Expand Section 2.2.3 and Policy Action 4.4.4.4 to support agriculture on public lands and edible landscaping to increase community access to local food.
- Strengthen community food security under Policy Action 4.4.4.4 by supporting food recovery programs that redistribute surplus, quality food at low or no cost while reducing food waste.
- Increase opportunities for local food production by supporting shared commercial kitchens and temporary markets under Policy Action 4.4.4.4.
- Consider potential environmental public health impacts of commercial food production on nearby residences in Section 2.2.3. For example: *"Limited food processing may be permitted within or near growth areas when integrated with retail or restaurant uses, provided measures are in place to mitigate potential adverse impacts such as noise, odour, and air quality."*

Accessible and Sustainable Housing:

The Islands Trust's 2025 Housing Needs Assessment highlights the need for more affordable and non-market housing. The OCP responds well by supporting diverse housing forms and locating housing near services, particularly in Sections 2.2.5, 2.4, and 2.5 and Policy Action 4.4.5.1. These approaches align with the HBE Toolkit and Complete Communities Guide, which emphasize a diverse housing supply to meet varying affordability and accessibility needs.^{1,2} Affordable, well-located housing improves financial security, supports access to essential services, and helps residents remain connected to their communities.¹

While the OCP addresses housing supply, it provides limited direction on housing quality, accessibility, and public health considerations associated with increased residential density and accessory dwellings in areas without municipal drinking water and sewer services. Strengthening these areas would help reduce health risks from failing onsite systems and climate change, while also supporting safe, long-term housing. One such solution would be referencing the BC Building Code's Adaptable Housing Standards, which would reinforce accessible, age-friendly housing that enables older adults and people with disabilities to live independently.^{1,2} Research shows that home accessibility improvements can support aging in place, reduce reliance on emergency services, and lower healthcare costs.¹

Given that Section 2.4.2.1 supports flexible housing and secondary suites on lots of two hectares or less, it is also important to consider servicing capacity. The Subdivision Standards require adequate native soil depth to support primary and reserve onsite wastewater systems, helping ensure long-term wastewater performance and reducing the need for future sewer extensions.⁷ In addition, shared private wells for accessory dwelling units may create small water systems regulated under the *Drinking Water Protection*

Act and Regulations, with requires subsequent approval, maintenance, and water quality monitoring.^{7,8} Early consultation with Island Health and the local Drinking Water Officer can improve regulatory compliance, reduce public health risks, and support informed housing development decisions.^{8,9}

Recommendations:

- Reference the Subdivision Standards under Policy 2.4.2.13.6 when assessing the suitability of individual or community onsite wastewater systems.
- Include guidance under Policy Action 4.4.5.1 to educate current and future homeowners about the responsibilities and public health implications of shared private wells.
- Reference the BC Building Code's Adaptable Housing Standards under Section 2.4.3.7 to support accessibility, aging in place, and features such as non-slip surfaces for older adults and people with disabilities.^{10,11}
- Include Island Health as a partner under Policy Action 4.4.5 to provide public health, regulatory, and climate resilience expertise for housing and development projects.

Transportation and Road Safety:

Car dependency increases the risk of motor vehicle collisions and injuries, particularly for vulnerable road users.¹² ICBC collision data for Gabriola show that crashes are concentrated near the Descanso Bay ferry terminal (North Road and Taylor Bay Road), where vehicle volumes are high and safe walking and cycling infrastructure is limited.¹³

The OCP recognizes the health benefits of active transportation through Objectives 2.2.4.5 and 2.2.5.11 and Policy Action 4.4.4.1, which support walking, cycling, physical activity, and well-being. Island Health supports these policies, particularly the focus on improving active transportation around the ferry terminal. Consistent with the HBE Toolkit and Complete Communities Guide, active transportation is a key component of complete communities that provides affordable mobility, improves access to employment and daily needs, and supports equitable health outcomes for children, older adults, newcomers, low-income households, and others with limited access to a vehicle.^{1,2}

However, the OCP could more explicitly address road safety, accessibility, and injury prevention. Incorporating safe environmental design principles, such as clear sightlines, context-sensitive lighting, and connected street networks, can reduce injuries, improve perceptions of safety, and encourage more people to walk and cycle.¹ The *BC Active Transportation Design Guide* also provides practical guidance for implementing these improvements.¹⁴ Strengthening road safety policies would increase confidence among people of all ages and abilities to choose active transportation, resulting in health, environmental, social, and economic benefits.^{15,16}

Recommendations:

- Revise Objective 2.2.5.11 to refer to "all ages and abilities", recognizing that mobility and accessibility needs extend beyond age alone.
- Strengthen Policy 2.3.1.4 by incorporating injury prevention approaches, such as Vision Zero and safe routes, to support safe active transportation for all ages and abilities.
- Under Section 4.4.4.1, prioritize safe design standards, street connectivity, and healthy environmental design, consistent with the BCCDC *Healthy Built Environment Linkages Toolkit*¹ and the BC Ministry of Housing's *Complete Communities Guide*.²

- Improve walkability for commercial and retail areas under Policy 2.3.1.4 through measures such as wider, even walking surfaces, benches, street greenery, physical separation from traffic, and relocating parking away from pedestrian routes.¹⁴

Community Resilience and Climate Readiness:

Climate change-related health hazards will disproportionately affect vulnerable populations.² The OCP appropriately incorporates climate mitigation and adaptation considerations through Objective 2.2.4 and Policies 2.3 and 2.5, with strong emphasis on protecting critical systems, infrastructure, and land-use decisions.

However, the OCP provides limited direction on how residents can be supported in preparing for climate-related hazards, particularly those with certain vulnerabilities (e.g. experiencing homelessness, low-income households, and people with disabilities or limited mobility). Strengthening the OCP with equity-focused policies, community-based initiatives, and preparedness programs would help ensure residents have the knowledge, resources, and social connections needed during emergencies. Improved preparedness can reduce health impacts, support faster recovery, decrease reliance on emergency services, and minimize economic losses associated with disruptions and recovery efforts.

Recommendations:

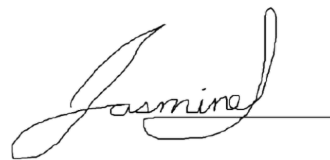
- Ensure climate adaptation and emergency planning under Objective 2.2.4 incorporate an equity lens to identify and address barriers experienced by vulnerable populations.
- Consider adding language under Policy 2.5.1.4 to support well-designed community gathering spaces with year-round functionality that can serve as critical infrastructure during emergencies and support distribution of essential services.
- Many OCP objectives align with Island Health's *Climate Change and Planetary Health Strategy*.¹⁷ To further strengthen implementation, the OCP could consider identifying Island Health as a partner within relevant policies and advocacy sections (2.2.6 and 4.4). Our multidisciplinary team is available to support evidence-based approaches to climate resilience, healthy community design, and emergency preparedness.

Overall, this OCP provides a strong foundation for guiding future growth and building climate-resilient communities. Island Health appreciates the opportunity to contribute and looks forward to continued collaboration with the Islands Trust.

Yours sincerely,



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