

On Wed, 10 Jul 2024 at 16:06, Janet Land <[REDACTED]> wrote:

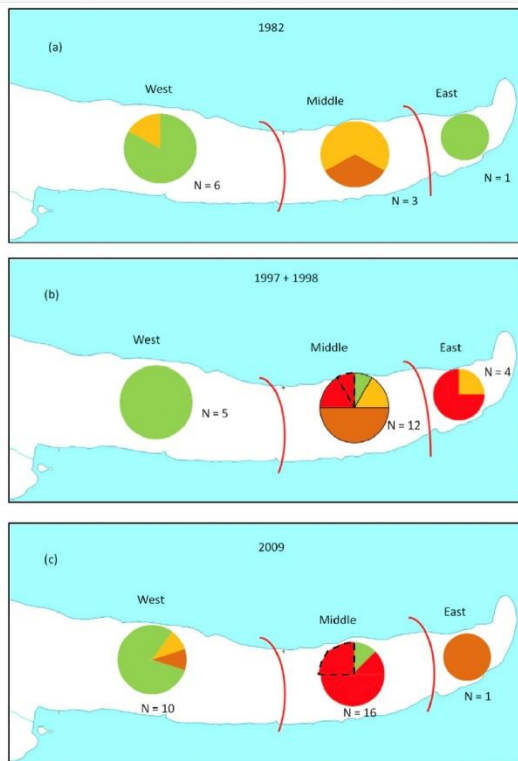
I want to offer the following comments on the Islands Trust Minor Housing Amendments Review Project.

A past proposal to allow secondary suites in most areas of Saturna was developed without any input from provincial groundwater specialists until the last possible minute and was thwarted as a result. The Ministry (now Water, Land and Resource Stewardship) needs to be involved at the beginning of this initiative as they have the historical perspective and expertise to advise on the impact of proposals on groundwater quality and specifically salt water intrusion.

The Lyall Harbour Boot Cove Water System provides a large number of properties with water from Money Lake but all other properties on Saturna use groundwater from wells many of which are located in areas at risk of salt water intrusion. There are some community water systems that use wells to provide water to a number of properties. These water systems are managed by qualified water operators who test and monitor water quality to ensure standards are met. These standards are set by the B.C. Drinking Water Protection Act and the Water Sustainability Act. The latter requires that a well must not be operated in a manner that causes saltwater intrusion. These water systems serve to protect groundwater since their community has the ability to prohibit certain land use activities that can negatively impact their wells.

By far the majority of the rest of the wells across Saturna are not part of any managed water system but are individual private wells owned and maintained by the property owner. There are no legal requirements for testing or monitoring of water quality for these private wells and no protection for the groundwater that is pumped.

Over past decades there have been a number of groundwater studies done on private wells on Saturna especially at East Point. The last study was done in 2009 https://www.env.gov.bc.ca/wsd/plan_protect_sustain/groundwater/library/aquifers/saturna_final_report2010.pdf and documented the spread of salt water intrusion in wells at East Point over the years.



The 2009 testing of wells was done only with the consent of the property owner. There has been no further testing done or action required by the Ministry even for those wells with salt water intrusion. Private well owners have complete autonomy and there is no oversight or enforcement of provincial groundwater quality requirements. Most if not all of the wells that had salt water intrusion are still in use today and their water quality status is unknown. Although testing of private wells on other areas of Saturna was done in 2000 <https://web.viu.ca/earle/geol304/allen-suchy.pdf> no further testing of those wells outside of East Pt has been done since. Given the amount of development that has taken place since 2000 the quality of groundwater may well be lessened but that can only be determined by further testing.

As salt water intrusion has become more prevalent and of concern some people have started collecting and storing rainwater and the Islands Trust has set requirements for rain water catchment in new construction or major renovations at East Point. While some property owners now rely solely on rain water catchment many continue to use their well for household use and use non potable rain water catchment for outdoor use. It is hard to determine what effect this augmentation with rain water catchment has had on groundwater quality without ongoing testing of well water.

It seems that there is now a proposal to require rain water catchment in areas identified as at risk of salt water intrusion in order to allow secondary suites where they have previously been prohibited. I certainly support the promotion of rain water collection and perhaps the requirement in new construction or renovations but this alone may not be sufficient to protect groundwater from existing wells where there could be a doubling of water for domestic use.

The area where secondary suites are currently prohibited includes properties served by the Lyall Harbour Boot Cove Water System. Since these properties are not using groundwater it would

seem reasonable to allow secondary suites there as long as the water system can support the extra use. They may wish to encourage or require rain water catchment as an adjunct to the water they provide if secondary suites are permitted.

Some other areas where secondary suites are currently prohibited are served by community water systems which may determine that secondary suites can be accommodated with the provision of rain water catchment . Since these systems are monitored regularly for water quality there is some assurance that groundwater will be protected even with additional use.

In all other cases where private wells are being used secondary suites should continue to be prohibited. At present there is no way to determine if these private wells are already salty or if an additional household would put the well over threshold and cause salt water intrusion. Nor is there any way to determine if the use of rain water catchment would be sufficient to counter balance the extra use by a secondary suite. In the absence of any outside oversight, testing or ability to prevent the pumping of salt water from private wells it would be irresponsible of the Island Trust whose mandate is to preserve and protect our water resources to allow a potential doubling of groundwater use in areas known to be at risk of salt water intrusion.

There are other concerns about secondary suites that should be considered. Secondary suites currently exist on Saturna. Some provide long term housing for local residents but others are more commonly used as accommodation for family or guests (paying or otherwise). Unless there are some enforceable restrictions on the permitted use it is likely that additional secondary suites will be used for other purposes than long term rental Their use as short term vacation rental not only puts additional pressure on water supplies during the critical dry summer season but drives up rental rates for long term housing. We have already seen this on Saturna. We have also seen the inability of the Islands Trust to shut down short term vacation rentals not permitted under our bylaws hence the need for an enforcement mechanism.

Respectively submitted,

Janet Land
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