

# Scott Point Waterworks District

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September 22, 2021

Islands Trust  
200 – 1627 Fort Street  
Victoria, BC V8R 1H8



RE: Islands 2050, Draft Bylaw 183

Thank you for the correspondence with Scott Point Waterworks District (“the District”) regarding the review of the Islands Trust Council Policy Statement (draft Bylaw 183). It is refreshing that during this review of the policy statement, it was realized that the Object requires the cooperation of municipalities, regional districts, **improvement districts** (emphasis added), other persons and organizations and the government of British Columbia. This was an omission during what staff describes as the Stage 1 public engagement.

The District has concerns regarding Part 4 of the Islands Trust Council Draft Bylaw No 183.

1. Under the Freshwater Stewardship Policy (4.2.7) additional protections for groundwater are proposed. The District supports these changes.
2. Under the Freshwater Stewardship Policies (4.2.5 and 4.2.9) Trust Council is proposing to not permit new desalination projects in the Trust Area.

The District does not agree that it is appropriate to rule out the use of desalination, particularly for public water utilities like the District. In an environment where the impacts of climate change on water supplies is uncertain, it would be irresponsible to prohibit certain technologies. While the District recognizes that certain desalination processes may cause problems in some instances, we believe that the technology of desalination is evolving to improve efficiency, reduce power use, and reduce adverse environmental impacts. It is possible that in the future desalination could be the most appropriate solution for the District to use to supply potable water to residents in specific applications.

3. Under Forest Stewardship Policy 4.3.9, Islands Trust is advocating that the provincial government grant it authority to regulate tree cutting in the Trust Area.

The District is not necessarily opposed to regulating tree cutting. The District is opposed to bureaucratic processes that require multiple consultations and add prohibitive costs to programs to remove dangerous trees from falling on the

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District's water treatment works, or remove growing trees on water main right-of-ways where roots could negatively impact facility integrity. Experience with tree removal by-laws in cities such as Vancouver and Victoria does not provide any confidence that Islands Trust could manage this regulation in an effective manner.

4. Under Agriculture Land Stewardship Policy 4.4.3, Islands Trust is already required to identify and preserve appropriate areas for agricultural land. The draft Bylaw is proposing to add the requirement to carefully consider downstream impacts to this policy.

The District supports this initiative, but believes downstream impacts should be expanded to include the careful consideration of the impact on groundwater aquifers and freshwater resources relied upon by other users.

The District believes that this draft Bylaw was prepared without any of the required consultation with improvement districts and holds that it would be appropriate to institute a process for detailed discussion on the points raised above. It would not be appropriate to simply work on revisions to the draft wording.

Scott Point Waterworks District believes that approval of this draft Bylaw should not be recommended at this time.

We look forward to being involved with these further detailed discussions.

Yours truly,

Richard T. Ballantyne, Chair  
Scott Point Waterworks District

cc: Peter Grove, Trustee, Salt Spring Island  
Laura Patrick, Trustee, Salt Spring Island