

From: Islands2050
Sent: Wednesday, June 9, 2021 10:23 AM
To: Islands2050
Subject: FW: Islands Trust is failing to protect the environment
Attachments: Water letter for distribution.docx

From: ALIX HODSON [REDACTED]
Sent: Wednesday, May 19, 2021 9:37 AM
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Subject: Islands Trust is failing to protect the environment

Please be advised that there is growing concern with the lack of environmental policy directives being considered in the policy statements amendments proposed by the Islands Trust. A current survey shows (Housing Matters Survey) that 76%+ of island residents on Gabriola do not want any further development or increase in density. Respondents want to maintain the existing population with a decrease in the potential population (density). Your own survey from 2016 reinforces these results. The Trust has no mandate to promote development on any of the Islands that are at a tipping point for environmental health.

Please find attached an analysis of proposed water and forest policies for the Island Trust Area with Gabriola Island examples.

Thankyou

May 18, 2021

Islands Trust Review

Upon recent review of the 67-page document that forms the bulk of the Trust Programs Committee's May 4/21 agenda package. We have serious concerns in regards to the protection of the environment. Specifically, protecting and preserving groundwater recharge areas (potable water sources) and Coastal Douglas fir forests in the Trust Area.

Ground water:

Islands like Gabriola, rely upon groundwater in fissures and fractures of the underlying bedrock for their potable water supply. The island has the second highest population density of the entire Trust Area and is at the tipping point for environmental health. All test wells on the island have shown a continuous drop in water level. Wells that were once rich in water have gone dry; and yet, there is virtually no mention or reference to groundwater recharge areas, protection of wells, watersheds, wetlands, lakes, streams, etc., in this document.

Nor, do proposed policies address utilities and the infrastructure to protect surface groundwater from sewage seepage and run off. Consequently, groundwater is being contaminated, wells polluted and the destruction continues on throughout all the island's ecosystems.

Coastal Douglas Fir Forests:

This problem is further compounded by the removal of all trees contributing to global warming, flooding, soil erosion and the loss of our carbon sync. With the loss of the trees that absorb carbon dioxide, atmospheric CO₂ builds up and contributes to acidification by increasing salinity and decreasing the ph levels. In the ocean this results in increased algae blooms, decreased plankton available to species, exoskeleton dissolution, damaging the sensory organs of crustaceans and eventually crippling the food chain.

Unfortunately, there appears to be no policy in place to stop the destruction of CDF Forests: over the past month Gabriola has seen up to 4 logging trucks per day leaving the island for mills elsewhere. Moreover, these logs range in size from young trees to old, indicating that the land has not been selectively logged, but instead clear-cut.

Climate change resulting from elevated CO₂ levels contributes another layer of concern for ground water resources and island ecosystem health. There is little mention of how this problem will be tackled in relation to the continued destruction of groundwater recharge areas, forests, and island eco systems.

In the directive policy statement amendments 2020, ecosystem 3.1.1, Trust Council holds that: proactive land use planning is essential for the protection of Trust area's ecosystems; and that, protection must be given to the these area's natural processes, habitats and species including those of the area's old forests, Coastal Douglas fir forests, Garry Oak/Arbutus forests, wetlands, open coastal grasslands; the vegetation of dry rocky areas; lakes, streams; estuaries, tidal flats, salt water marshes, drift sectors, lagoons; kelp, eel grass beds; fish and all marine life.

DPS (Directive Policy Statements) also use the definition of "sustainable" as the capability of being maintained indefinitely; capable of meeting the environmental, economic and social needs of current generations without compromising the ability of future generations to meet their needs.

Unfortunately the word "sustainable" is not precise enough to be a strong directive to guide the Trust when making decisions on land-use, development and rezoning to increase densities. This term turns out to be too fuzzy, undefined and only serves to add to the confusion and perpetuates the ineffective, effete, inconsistent and useless policies which plague the Trust.

For example, the process of development, that includes both subdivisions and upzoning to smaller parcels of land, is "not sustainable"; especially, when islands are at the tipping point of environmental health, as previously mentioned on Gabriola; and yet, the process of rezoning and "density increase" continues under the guise of being "sustainable".

Policy 4.2 acknowledging the impacts of climate change on freshwater availability in the Trust area and LTC's and 4.3 the impact on CDF and CWH forests both need additional directive policies that are specific and clear. These policies must develop and incorporate a methodology to define/measure each island's carrying capacity in collaboration with the ITC and independent scientists to inform consistent, scientifically informed decision-making across the Trust Area and include a "cumulative effects framework" into revision of development proposals within the Trust Area, particularly, but not exclusively, in water and ecologically sensitive areas that need to be protected by environmental development permits (DPA's).

According to a media release from the Islands Trust, which was circulated during the meeting, "development applications more than doubled on Salt Spring Island to 105%" and increased by 90% on the other southern islands in the first quarter of this year. With immense development pressure exacerbating the already tangible impacts of climate change on the Gulf Islands, as well as further fragmenting and degrading natural habitats throughout the Gulf Islands, it is essential to consider island carrying capacity (particularly in relation to freshwater availability {1}) and the consideration of cumulative effects when making any development decisions. Both terms should be defined within the TPS to improve clarity and operationality.

We ask that you please place the **environment first** in all your considerations and when making land-use decisions. Policies must be updated to reflect the importance of “preserving and protecting” the environment and act with the urgency and boldness that a climate emergency warrants. Ensure that there are strong linkages between the objective and directives of the Trust Act and Policy Statement and the implementation of these priorities in local planning areas and services. The TPS must reflect the Trust’s duty of care in implementing the Trust Object and ensuring that it is both operational and enforceable at the local planning level.

Thankyou for your consideration,

Alix Hodson (M.Ed)

{1} Carrying capacity is the level of human activity, population growth, land use, and physical development that the environment can support without serious degradation and irreversible changes.(Świądera, etal ,2020, p. 57).