

From: PETER ROBINSON [REDACTED]
Sent: Saturday, March 19, 2022 10:29 AM
To: Islands2050
Subject: Comments About the Draft Policy Statement
Attachments: Draft Islands Trust Policy Statement.docx

Please find attached our comments about the Draft Islands Trust Policy Statement.

Sincerely,

Peter Robinson and Kristine Webber
Mayne Island

March 15, 2022

Peter Robinson and Kristine Webber

████████████████████
Mayne Island, BC V0N 2J1

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

Re: Draft Islands Trust Policy Statement

To whom it may concern:

We own ██████████, a 143-acre property on Mayne Island located at ██████████. The farm is made up of hay fields, an orchard, upland forests, and a 25-acre wetland – together with residential and farm buildings.

The farm dates to 1871, so it is one of the oldest in the Gulf Islands. Since that time, it has been in continuous agricultural use. Roughly half of the property is in the Agricultural Land Reserve (ALR). Today, we supply hay to animal owners on Mayne Island, along with fruit for sale or juicing. Our plans are to increase the amount of food grown on the farm and diversify into areas that are not well-served by growers on the island.

We are writing to you about the Draft Islands Trust Policy Statement, which is currently out for comment. We agree with the overarching need for the Trust to have a “conservation-oriented responsibility to preserve and protect the Islands Trust Area ...” (p. 2), however we do have three concerns about the current draft.

1. Proposed Agricultural Land Stewardship Policies

The first has to do with proposed revisions to the Agricultural Land Stewardship Policies noted in Section 4.4.

In our experience, “soft” definitions can be used by to justify almost anything. This is problematic with respect to wording such as “small-scale, sustainable, regenerative, supportive of local climate action and food security, respectful of indigenous harvesting areas, and protective of the environmental integrity of the Trust Area” (Section 4.4.2).

There is no definition of what small-scale or sustainable mean, and in the absence of clarity it leaves farm owners such as us wondering what the Trust intends. Do our 60 acres of hay fields count as small-scale? What does sustainable really mean, as the word is used in so many contexts that it can mean anything now. If sustainability means, as defined on page 15, “the ability to meet the needs of the present without compromising the ability of future generations to meet their own needs”, this archaic definition from the 1980s could be used to justify almost any actions that could impair the ability of farmers to be productive, innovative, or respectful of natural systems.

Our concern is also consistent with the letter the Islands Trust received from the Ministry of Agriculture, Food and Fisheries sent on October 19, 2021. In that letter, Ministry staff noted “There is no description of what differentiates “small-scale” from “medium-scale” and “large-scale”. This becomes a purely subjective matter.” We agree with the Ministry’s comment.

We cannot support the current wording of Section 4.4 without clarity about what the Islands Trust means with the new wording. It makes no sense to have someone who is not a working farmer, or who doesn’t understand regenerative agriculture, define how farmers should go about their work.

2. Hyperabundant Deer Populations

At the same time, we find the absence of language about managing the hyperabundant deer population on the island to be a total lapse. Aside from development activities, there is no other factor contributing to the degradation of island ecosystems that compares with the lack of action on deer. Over the years we have owned this farm, we have seen herds of invasive Fallow Deer increase to sizes of 30 or 40 at a time in our fields. They graze virtually everything, and our uplands forests are now almost “green deserts”, with no underbrush or young trees. To deal with this, we have had to invest in expensive deer fencing, which must be regularly maintained and repaired. Even then, it is almost impossible to enclose all our fields and forests.

The impacts of deer are a disaster with respect to the “conservation-oriented responsibility to preserve and protect the Islands Trust Area ...” which is core to the Islands Trust mandate. The absence of language to address deer is a glaring omission, particularly for farmers.

3. Water Management

In addition to the absence of language on deer, the absence of language about encouraging rain-water collection is also a glaring omission. We have installed a number of rain-water harvesting systems to reduce our uptake of well-water. And such systems work. By doing this, we help to preserve the aquifer in our area, which we also depend on. So not making rain-water collection a part of the Policy Statement is an example of a lack of focus on the very urgent issues facing island residents.

We conclude by saying we agree with much of the new language in the Policy Statement. In addition to agricultural experience, we both have extensive backgrounds in the environment, housing, and land stewardship fields, so the new policy statement mostly resonates with us.

However, the ambiguous nature of some of the language, plus the failure to address other serious issues facing farmers such as ourselves, means the document should not be adopted as written.

Sincerely

A handwritten signature in black ink, appearing to be 'Peter Robinson and Kristine Webber', written in a cursive style.

Peter Robinson and Kristine Webber
Hedgerow Farm

cc: Adam Olsen, MLA Saanich North and the Islands
Jeanine Dodds, Trustee
David Maude, Trustee