



Info@friendsofthegulfislands.ca
<https://www.friendsofthegulfislands.ca>

April 22, 2025

Islands Trust Programs Committee

Dear Members of the Trust Programs Committee

Friends of the Gulf Islands Society wishes to provide input regarding the Draft Trust Policy Statement sections numbered 3.5.1 through 3.5.5. The paramount importance of water supplies for the islands demands that it be given strong protection.

Recommendation #1: Sections. 3.5.1 through 3.5.5 should all be Directives, not merely advisory.

Explanation: Assuring sufficient supplies of water for the islands may be considered the most important single resource necessary for the islands to have healthy communities, healthy economies and healthy natural ecosystems. It is the resource that is most stressed by over-development and therefore should have the strongest protection possible. .

Below are Sections 3.5.1, 3.5.2 and 3.5.5 with recommended amendments to the current draft indicated in red. An explanation follows each item.

Recommendation #2: 3.5.1 should be amended as indicated below.

Words recommended to be added to draft text are red.

3.5.1 Freshwater Sustainability

Ensure that neither the density, nor intensity of land use is increased in **watersheds (or groundwater capture areas)** where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable, **given current development, development allowed by current zoning, and the needs of the natural ecosystems.**

Explanation: The term “watersheds” is not adequate because this term usually indicate areas where the water flows from the height of land then downhill to streams and then to the ocean. However, because of the nature of the geology in the Trust area, groundwater may flow to a different watershed than where the surface water flows. Therefore, the words “groundwater capture areas” should be added.

Additionally, it is important that it be stated for what the supply of freshwater is likely to be inadequate, i.e. development and the natural environment. The water needs of landowners who have not yet developed their land should be specifically considered.

Recommendation #3: Section 3.5.2 should be amended as follows:

3.5.2 Freshwater Demand and Supply Projection

Ensure that existing, anticipated, and seasonal water demand and water availability are considered, **including possible changes in water supply due to climate change, status and density of existing wells and yet undeveloped properties.**

Explanation: It is best to specifically state what needs to be considered, otherwise, these items may not be considered.

Recommendation #4: Section 3.5.5 Freshwater Uses should be amended as follows:

3.5.5 Freshwater Uses

Strive to ensure that freshwater use is not to the detriment of other uses of the waterway such as fish and fish habitat uses, **other in-stream uses and uses by natural ecosystems**, Indigenous cultural and spiritual uses, aesthetic and recreational uses, and the maintenance of water quality in lakes and streams.

Explanation: The draft wording only recognizes the need to protect fresh waterways for the benefit of fish. Streams and lakes on our islands support a wide variety of plants and animals some of which depend on each other to survive. For example, some fish eat small insects that insects fall into the water from overhanging plants. Overhanging plants shade streams to prevent their becoming too warm for some fish. Other animals are dependent upon stream water for drinking and there are likely many plants and animals that depend on plants that only grow in wet areas. These uses together are often referred to as “in-stream uses”. The words “used by natural ecosystems” have been added to be inclusive of other natural uses.

For comparison, the current Trust Policy Statement specifically recognizes in-stream uses. See below:

“4.4.2 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address measures that ensure:

- neither the density nor intensity of land use is increased in areas which are known to have a problem with the quality or quantity of the supply of freshwater,*
- water quality is maintained, and*
- existing, anticipated and seasonal demands for water are considered and allowed for.*

4.4.3 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address measures that ensure water use is not to the detriment of in-stream uses.¹⁸

¹⁸ In-stream Uses - include water uses such as fish and habitat uses, aesthetic uses, recreational opportunities and the maintenance of water quality in lakes and streams and wetland.”

Recommendation #5: The following principles and policies should remain as they are in the current draft.

Explanation: These policies are as relevant and essential today as when they were written, and will continue to be relevant and essential in the future.

2.1.6 Account for Cumulative Effects

To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats.

3.3.2 Sensitive Ecosystems

Identify and prioritize the preservation, protection, and restoration of sensitive ecosystems in the Islands Trust Area, classified as the following ecosystem types: cliff; freshwater; herbaceous; old and mature forest; riparian; wetland; and woodland.

3.3.5 Watershed Ecosystems

Identify and prioritize the preservation, protection, and restoration of watershed ecosystems, freshwater sources, and groundwater recharge areas.

We hope you will give these recommendations your most serious consideration. Please feel free to contact us if you have any questions.

Sincerely,

Jennifer Margison, President
Friends of the Gulf Islands Society