

From: consult kea [REDACTED]
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Appended

Francois Theriault
[REDACTED]

Response to Islands Trust Draft Policy Statement

An argument opposing -

1. Premise

A. The Draft Policy Statement¹ violates the principle Object of the *Islands Trust Act [RSBC 1996]*.

B. The Draft Policy Statement violates common sense by failing to acknowledge obvious limits to growth: infrastructure including roads, ferry access, public transit, and most notably, access to potable water.

2. Relevant Supporting Evidence

A. The Principal Object of the *Islands Trust Act [RSBC 1996]*² is to -

... preserve and protect the trust area and its unique amenities and environment ...

The current Policy Statement correctly defines the purpose of the Object.

Preserve - to maintain in a given condition. Preservation often requires maintaining the processes that generate the desired condition.

Protect - to maintain over the long-term by managing, or if necessary limiting, the type and intensity of development or activity to ensure that valued attributes are not compromised or destroyed.³ (emphasis added)

One of the six Guiding Principles listed in the same document again states –

Trust Council believes that to achieve the Islands Trust object, the rate and scale of growth and development in the Trust Area must be carefully managed and may require limitation.⁴ (emphasis added)

An external management review has identified the Council's misunderstanding of the Principle Object as "a dramatic example of Trust Council's collective leadership deficit".⁵ In their defence, the Trust Council must handle an alphabet soup of overlapping laws, regulations and agencies in addition to competing local interests that undermine comprehensive management.

The preamble of the current Policy Statement documents the longstanding and widespread concern regarding the enormous pressure for development of the Gulf Islands. In response, the public has expressed "overwhelming support for both the Islands Trust and its object".⁶ This informative preamble is deleted from the Draft Policy Statement. The growth and development directives proposed by the Islands Trust Council are the antithesis of preservation and protection.

B. The precarity of potable water supply on the Gulf Islands is well-documented by studies,^{7,8,9} including one commissioned by the Islands Trust.¹⁰ Seasonal shortage of groundwater, and salt water intrusion are expected to accelerate as withdrawal progresses. Surface water shortage is evidenced by

the moratorium on new permits, and the routine restriction implemented in eight of the last ten years. Failure of the Cedars of Tuam Utility suggests that the groundwater supply is already compromised. The need to transport water into the Cedars of Tuam Utility has increased the cost of one cubic meter of water to fourteen times greater than the current charge in Kelowna (\$9.00/m³ vs. \$0.63/m³).^{11,12}

3. Conclusion

A. Compliance with the law is non-negotiable. The Draft Policy Statement deletes all reference to control and restriction of development. The current Policy Statement's option to limit development must be maintained. The twelve paragraph preamble documenting the historical context of the Islands Trust Act must also be restored as a reminder to all of the consistent threat posed by development. The Principle Object of the *Islands Trust Act* must be respected.

B. The promotion of development will inevitably increase demand for infrastructure in general and potable water in particular. Given the current precarity of water supply, the Draft Policy Statement defies common sense. Management of the Gulf Islands must consider limits to growth as well as the Principle Object before unleashing development of any kind.

The promotion of an idyllic 'complete community' appears to motivate Council's Draft Policy Statement. This goal deserves a final comment. Firstly, the *Act* does not mandate the social engineering of the Gulf Islands population. Preservation and protection are the principle objectives. The Council is therefore reaching well beyond its jurisdiction. Secondly, employee-specific housing in an expense resort market is a nut that has already been cracked. The solution would require a non-profit corporate structure, stiff qualifying requirements, competent management, and a more extensive business sector prepared to subsidize housing, and pay a living wage (see Whistler Housing Authority¹³, Banff Housing Corporation¹⁴). And thirdly, the exceptional character of the Gulf Islands will continue to drive up demand and pricing. An unconstrained development policy in a highly desirable market will inevitably benefit current land owners and serve the wealthy at the expense of all that is currently valued.

References

1. Draft Policy Statement
<https://islandstrust.bc.ca/document/bylaw-183-policy-statement-schedule-a/>
2. *Islands Trust Act [RSBC 1996]*.
https://www.bclaws.gov.bc.ca/civix/document/id/rs/rs/96239_01
3. Current Islands Trust Policy Statement, Part 1, pg 1.
<https://islandstrust.bc.ca/document/islands-trust-policy-statement-consolidated-2023/>
4. Current Islands Trust Policy Statement, Part 1, pg. 6
<https://islandstrust.bc.ca/document/islands-trust-policy-statement-consolidated-2023/>
5. Islands Trust Governance Review. Great Northern Management Consultants, 2022.
<https://islandstrust.bc.ca/document/governance-review-final-report-february-2022>

A formal review of the Islands Trust Council has documented a longstanding difficulty with “Persistent divisions around the meaning of the Preserve and Protect Object”. Sadly, the report also tabulated a long list of dysfunctional Council features including:

- “leadership selection process flawed,
- key partners absent from decision-making,
- practices, proceedings and committee structure do not foster the development of consensus,
- Significant concerns regarding efficiency, and cost-effectiveness as well as timeliness,
- inadequate allocation of resources,
- performance measures largely absent,
- performance targets are virtually non-existent
- processes are obscure and overly bureaucratic.”

The content, development and delivery of the Draft Policy Statement suggest that little has changed.

6. Current Islands Trust Policy Statement, Part 1, pg.ii.
<https://islandstrust.bc.ca/document/islands-trust-policy-statement-consolidated-2023/>
7. Larocque I, Allen DM, Kirste D. 2015. The Hydrogeology of Salt Spring Island. Department of Earth Sciences, Simon Fraser University.
8. KWL. (2015a). St. Mary Lake Watershed Water Availability and Demand - Climate Change Assessment. Victoria: Kerr Wood Leidal Associates Ltd.
9. KWL. (2017). St. Mary Lake Watershed Water Availability and Demand - Climate Change Assessment 2017 Update. Victoria: Kerr Wood Leidal Associates Ltd.

“... Based on this finding, it is recommended that: 1. No additional water licences for St. Mary Lake be issued by the Province given the limitations of current lake storage to support the maximum water demand at the licenced withdrawal limit and the minimum environment flow in Duck Creek;”

Extracted from: <https://northsaltspringwaterworks.ca/documents/reports/> October 2025

10. Gorski, N. G. and J. P. Sacré. 2019. Aquifer mapping and monthly groundwater budget analysis for aquifers on Salt Spring Island. Water Science Series, WSS2019-01. Province of British Columbia, Victoria.

“... the current volume of water allocated under water licenses exceeds the available water under drought conditions.”

11. Cedars of Tuam Water Service Commission Meeting Agenda, 21 October 2024, pg. 3.
chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.crd.ca/media/file/2024-10-21agendabudget

12. Current Kelowna Water Rates
chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://apps.kelowna.ca/CityPage/Docs/PDFs/Bylaws/Water%20Regulation%20Bylaw%20No.%2010480.pdf

13. <https://whistlerhousing.ca/>

14. <https://banff.ca/156/Banff-Housing-Corporation>