

From: David Dunnison [REDACTED]
Sent: Saturday, February 5, 2022 1:45 PM
To: Islands2050
Subject: Opposition to New Draft Policy: Proposed Ban on Docks (I am for docks)

This is part 1 of 2: Opposition to New Draft Policy: Proposed Ban on Docks (I am for docks)

Regards,
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Islands 2050 Submission

Opposition to Ban on Docks

Part 1: Evacuation Planning and Critical Infrastructure

Islands Trust 15 July 2021 DRAFT Trust Policy Statement:

4.6.7 It is Trust Council's policy that the following restrictions are necessary in order to preserve and protect the sensitive coastal and marine waters of the Trust Area:

- *new private docks should be limited to boat access only properties; (new)^[i]*

4.6.14 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, prohibit new private docks except where properties are boat-access only. (new)^[iii]

Please consider:

1. All Island Trust Area properties are boat access only by definition. Existing roadways are inadequate and will be easily overwhelmed by large-scale evacuations. Existing evacuation plans for multiple islands within the Islands Trust Area include private boats and private docks by necessity.
2. Docks are not universally harmful to the marine environment. They can be beneficial and offer a convenient mechanism to reduce a major source of marine contamination – abandoned vessels.
3. A rigorous multi-jurisdictional approval process exists, including environmental and archeological assessments.



Figure 1: "Area of B.C. burned by wildfires at a 56-year high" (CBC) 29 July 2017.^[iii]

Part 1: All Island Trust Area properties are boat access only. Not only by definition, but by practicality.

(Part 2: Environmental Impact and Rigorous Existing Process will follow separately)

Minimally, this proposed Policy Statement provision should be amended such that qualifying road access meets FireSmart criteria and that this proposed addition of 4.6.7 and 4.6.14 are not in opposition to the proposed modification of section 6.1.18 to include wildfire risk mitigation. And that Section 4.4.6 be modified to incorporate 'FireSmart standards' to specify minimum road standards.

6.1.18 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, identify means to reduce the climate vulnerability of communities, including nature-based solutions and actions that prioritize:

- wildfire risk mitigation (new)^[iv]



Figure 2: Tourists, villagers evacuated by boat as wildfires ravage Turkish resorts. August 2021. (The Times of Israel) ^[v]

Major evacuation and rescue efforts around the world, including for island wildfire evacuation, would have been otherwise unsuccessful without the use of private boats and their private docks.^{[vi] [vii] [viii] [ix] [x]}

This has been true for both small and large communities.



Figure 3: Boats rescue half a million people during 9/11 attacks. © 2001. New York City Police Department. All rights reserved. (Smithsonian Magazine)^[xi]

However, even such an amendment solely for wildfire risk overlooks a number of factors that highlight private docks as critical infrastructure. Docks have proven critical for more than massive evacuations and even Covid tests on Salt Spring have required access to a private dock.^[xii]

Most islands within the Islands Trust Area have only one main road – one that can easily become overwhelmed by a wildfire event, landslide, flooding, forest windfall, or other environmental impact such as many experienced during the atmospheric river events of this past fall.^[xiii] Sheltering in place – the current default option for Salt Spring^[xiv], Southern Gulf Islands^[xv] and Juan de Fuca^[xvi] is not a viable option for wildland interface fires as many recent incidents throughout the Pacific Northwest, and around the world, have tragically revealed.

Many other islands within the Islands Trust Area, as well as neighbouring areas expressly include use of private boats and private docks in their formal evacuation plans. These communities include Bowen^[xvii], Denman^[xviii], Gabriola, Gambier^[xix], Hornby^[xx], Keats^[xxi] and Saturna^[xxii] along with the Sunshine Coast Regional District^[xxiii], Squamish and Whistler^[xxiv] among others.

While Gabriola, Mudge and De Courcy are still in the process of developing their evacuation plans, they note:

“These islands have unique evacuation challenges, including many one-way access neighbourhoods, forested properties and limited ferry capacity. A new evacuation plan for

Gabriola, Mudge and Decourcy Island will identify strategies and alternate evacuation methods to coordinate a safe and orderly multi agency evacuation response to the islands.”^[xxv]

FireSmart recommends at least two evacuation routes.

“Every year, tens of thousands of Canadians are placed on evacuation notice or evacuated from their homes and places of work because of the risk of wildfire. ... Many incidents resulting in tragic and costly losses can be blamed on substandard water supply, or inadequate access and evacuation routes”^[xxvi]

Where roads exist within the Islands Trust Area, many if not most roads within the Islands Trust Area would be deemed inadequate as they do not “*provide safe simultaneous access for emergency vehicles and public evacuation*”^[xxvii] and would otherwise not meet minimum FireSmart guidelines for width, parking allowance, height clearance, minimum curvature radius, maximum road gradient, turnaround diameter, gate distances, etc.^[xxviii] In fact, the Islands Trust Policy Statement expressly directs roadbuilding to minimum standards necessary for service and not to FireSmart standards (Section 4.4.6).



Figure 4: “Thousands of Australian residents had to take refuge on a beach as wildfires raged” (CNN) 31 December 2019^[xxix]

Moreover, as the Islands Trust may be aware, the few roads that do exist within the Islands Trust are notorious for their poor condition.^[xxx] Maintaining our roads costs more than nearby areas on Vancouver Island. Our maintenance funding allocations are thus spread thinner. The roadwork is harder to coordinate. And our roadwork needs are at the bottom of the priority list.

According to a representative from the Ministry of Transportation and Infrastructure:

“A part of the reason for that is that our dollars get even less (roadwork maintenance) accomplished on the Southern Gulf Islands because of difficult mobilization costs and non-

existent sources of local material. For example, in order to provide the same square-meters of resurfacing on Pender as say, Shawnigan Lake, our costs are a minimum of 30-50% higher. A second reason is our need to prioritize on a larger regional scope – (where) your road is competing with primary collector routes on SSI, Shawnigan Lake, West Saanich, etc., for funding.”^[xxxix]

Even if roads within the Islands Trust Area did meet FireSmart criteria and even if they were well-maintained, “Secondary evacuation routes are also important.” Given that these are all islands, a secondary evacuation route is necessarily and most-effectively a marine evacuation. This requires docks – many docks spread throughout the islands.

As the Saturna Evacuation Plan underscores:

“the whole island could be lost in a very short space of time and evacuation off island is much more complicated. It is our personal responsibility to know where possible marine evacuation sites are located”^[xxxix]

BC Ferries, meanwhile, are easily overwhelmed,^[xxxix] typically have easily congested access at their Islands Trust Area terminals and are themselves, their wharves and fuel depots at high risk. Even Denman Island with two ferry terminals and a population of barely 1,000 people, for example, includes private boats and docks as an option in its current Evacuation Plan.^[xxxix]

It is not an inflammatory statement to observe that, within the Islands Trust Area, limiting the construction of docks puts lives at risk. Increasingly so under Climate Change.

Private docks represent critical infrastructure throughout the Islands Trust Area and may always remain as such. Funded by private landowners, private docks are clearly the most cost-effective means from a local governmental point-of-view to provide primary and secondary evacuation routes.

Recommendations:

Please amend the Draft Policy Statement to include the need to incorporate consideration of and provisions for evacuation plan support in official community plans. Please especially consider the need to pro-actively confront wildfire risk. Please recognize that private docks are critical infrastructure throughout the Islands Trust Area. Please remove all newly added restrictions on docks and revert and return this responsibility to those bodies best equipped to oversee dock permits, construction and maintenance. Please modify Section 4.4.6 to incorporate ‘FireSmart standards’ to specify a reference for minimum road standards.

^[i] Islands Trust Council Draft Bylaw No. 183: Islands Trust Policy Statement Bylaw, 2021. Islands Trust. 15 July 2021. pp 24. Accessed at: <https://islandstrust.bc.ca/document/draft-new-policy-statement-clean-version-july-2021/> 30 January 2022.

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- [ii] Ibid.
- [iii] Tara Carmen. Area of B.C. burned by wildfires at a 56-year high. CBC. 29 July 2017. Accessed at: <https://www.cbc.ca/news/canada/british-columbia/area-of-b-c-burned-by-wildfires-at-a-56-year-high-1.4226227> 5 February 2022.
- [iv] Ibid.
- [v] Mehmet Guzel and Zeynep Bilginsoy. Tourists, villagers evacuated by boat as wildfires ravage Turkish resorts. The Times of Israel. 2 August 2021. Accessed at: <https://www.timesofisrael.com/tourists-villagers-evacuated-by-boats-as-wildfires-ravage-turkish-resorts/> 4 February 2022.
- [vi] Hanc. On 9/11, a Flotilla of Ferries, Yachts and Tugboats Evacuated 500,000 People Away From Ground Zero. Smithsonian Magazine. 9 September 2021. Accessed at: <https://www.smithsonianmag.com/history/911-flotilla-boats-evacuated-500000-new-yorkers-safety-180978614/> 3 February 2022.
- [vii] The Little Ships of Dunkirk. The Maritime Executive. 22 February 2020. Accessed at: <https://www.maritime-executive.com/blog/the-little-ships-of-dunkirk> 3 February 2020.
- [viii] Turkey evacuates panicked tourists by boat from wildfires. Canadian Press. 31 July 2021. Accessed at: <https://www.sasktoday.ca/world-news/turkey-evacuates-panicked-tourists-by-boat-from-wildfires-4184472> 3 February 2022.
- [ix] Fire devours Greek island's forests; residents urged to flee. Canadian Press. 8 August 2021. Accessed at: <https://lethbridgenewsnow.com/2021/08/08/fire-devours-greek-islands-forests-residents-urged-to-flee/> 3 February 2022.
- [x] Capt. [Nicole Sours Larson](#). Dock Lines: Preparing your boat as an evacuation home. The Log. 9 June 2016. Accessed at: <https://www.thelog.com/dock-lines/dock-lines-preparing-your-boat-as-an-evacuation-home/> 3 February 2022.
- [xi] Hanc. On 9/11, a Flotilla of Ferries, Yachts and Tugboats Evacuated 500,000 People Away From Ground Zero. Smithsonian Magazine. 9 September 2021. Accessed at: <https://www.smithsonianmag.com/history/911-flotilla-boats-evacuated-500000-new-yorkers-safety-180978614/> 3 February 2022.
- [xii] <https://vancouver.sun.com/news/local-news/covid-19-salt-spring-man-says-complying-with-test-at-land-border-was-a-nightmare>
- [xiii] Emelie Peacock. Salt Spring Public Asked To Not Travel On Closed Roads. 25 November 2021. Accessed at: <https://www.gulfislandsdriftwood.com/news/salt-spring-public-asked-to-not-travel-on-closed-roads/> 1 February 2021.
- [xiv] Salt Spring Island Emergency Program. Capital Regional District. Accessed at: <https://www.crd.bc.ca/service/fire-and-emergency-programs/ssi-emergency-program> 3 February 2022.
- [xv] Southern Gulf Islands Emergency Program. Capital Regional District. Accessed at: <https://www.crd.bc.ca/service/fire-and-emergency-programs/sgi-emergency-program> 3 February 2022.
- [xvi] Juan de Fuca Emergency Program. Capital Regional District. Accessed at: <https://www.crd.bc.ca/service/fire-and-emergency-programs/jdf-emergency-program> 3 February 2022.
- [xvii] Bowen Island Municipality Evacuation Plan 2020. Bowen Island Municipality. Accessed at: <https://bowenland.civicweb.net/document/224961> 3 February 2022.
- [xviii] Denman Island Evacuation Operational Guidelines. Comox Valley Emergency Program. pp 10. Accessed at: https://www.comoxvalleyrd.ca/sites/default/files/docs/Services/Emergency_Services/denman_island_evacuation_operational_guidelines.pdf 3 February 2022.
- [xix] Emergex. Gambier Island and Keats Island Hazard, Risk And Vulnerability Analysis. 2005. Accessed at: <https://www.scrd.ca/files/File/Community/EmergencyOps/Gambier%20and%20Keats%20Island%20Supplement%20to%20the%20SCRD%20HRVA,%20Nov%207,%202005.pdf>
- [xx] Hornby Island Evacuation Operational Guidelines. Section 5 Transportation: Marine Transport. Section 10 – Resources: Private Boats. Accessed at: https://www.comoxvalleyrd.ca/sites/default/files/docs/Services/Emergency_Services/hi_evacuation_guidelines_1_dec2020.pdf 3 February 2022.
- [xxi] Emergex. Gambier Island and Keats Island Hazard, Risk And Vulnerability Analysis. 2005. Accessed at: <https://www.scrd.ca/files/File/Community/EmergencyOps/Gambier%20and%20Keats%20Island%20Supplement%20to%20the%20SCRD%20HRVA,%20Nov%207,%202005.pdf>

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- [xxii] Seasonal Wildfire Danger Alert & Evacuation Practice. Saturna Island Community Website. 22 May 2016. Accessed at: <http://www.saturnacan.net/in-depth/seasonal-wildfire-danger-alert-evacuation-practice> 2 February 2022.
- [xxiii] Emergex. Gambier Island and Keats Island Hazard, Risk And Vulnerability Analysis. 2005. Accessed at: <https://www.scrd.ca/files/File/Community/EmergencyOps/Gambier%20and%20Keats%20Island%20Supplement%20to%20the%20SCRD%20HRVA,%20Nov%207,%202005.pdf>
- [xxiv] Sea to Sky Multimodal Evacuation Plan. Resort Municipality of Whistler and District of Squamish. Accessed at: <https://squamish.ca/assets/Uploads/054d5f7a8d/RMOW2951-EvacuationPlanDocument-v7.pdf> 3 February 2022.
- [xxv] Gabriola Evacuation Route Planning. <https://www.getinvolved.rdn.ca/gabriola-evacuation-route-planning> Accessed at: 3 February 2022.
- [xxvi] FireSmart: Protecting your Community from Wildfire. Partners in Protection. July 2003. Accessed at: <https://www.firesmartcanada.ca/wp-content/uploads/2018/10/FireSmart-Protecting-Your-Community.pdf> 1 February 2022.
- [xxvii] FireSmart: Protecting your Community from Wildfire. Partners in Protection. July 2003. Accessed at: <https://www.firesmartcanada.ca/wp-content/uploads/2018/10/FireSmart-Protecting-Your-Community.pdf> 1 February 2022.
- [xxviii] Ibid p 30.
- [xxix] Jessie Yeung et al. Thousands of Australian residents had to take refuge on a beach as wildfires raged. CNN. 31 December 2019. Accessed at: <https://www.cnn.com/2019/12/30/australia/australia-mallacoota-beach-fire-intl-hnk-scli/index.html>
- [xxx] Elizabeth Nolan. Short and long term fixes on for Walker's Hook Road. Gulf Islands Driftwood. 28 September 2016. Accessed at: <https://www.saltspringseasalt.com/wp-content/uploads/2018/07/Driftwoodroyalefleur2-copy.pdf> 2 February 2022.
- [xxxi] Private Correspondence. Ministry of Transportation and Infrastructure. 23 August 2018.
- [xxxii] Seasonal Wildfire Danger Alert & Evacuation Practice. Saturna Island Community Website. 22 May 2016. Accessed at: <http://www.saturnacan.net/in-depth/seasonal-wildfire-danger-alert-evacuation-practice> 2 February 2022.
- [xxxiii] BC Ferries implements temporary service changes to Southern Gulf Islands due to staffing challenges. CHEK News. 17 January 2022. <https://www.cheknews.ca/bc-ferries-implements-temporary-service-changes-to-southern-gulf-islands-due-to-staffing-challenges-938901/>
- [xxxiv] Pp 10. https://www.comoxvalleyrd.ca/sites/default/files/docs/Services/Emergency_Services/denman_island_evacuation_operational_guidelines.pdf