

Residents of Gabriola (see signatories)  
c/o Liz Steele & Terry Rollerson

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October 6, 2025

Local Trust Committee for Gabriola  
700 North Road  
Gabriola Island, BC  
V0R 1X3

Dear Trustees,

Re: Proposed 200-Metre Shoreline Buffer

Thank you for the work by you and your planning staff to address our challenges on Gabriola Island. We appreciate everything you do in service of our community.

We are writing about the proposed 200-metre shoreline buffer zone as described on your [web page](#) and by Derek Kilbourn, in his [article in The Gabriola Sounder on October 1, 2025](#) (printed pages 3/10). As land owners in this proposed zone, we are very concerned about it for the reasons listed below. Comments are presented about the article in the order the text appears in the newspaper, so they can easily be read side-by-side.

1. Generally, we question the reasoning for this zone when no explanation has been provided as to the rationale for using the number "200," nor has any explanation been provided as to the effect on a landowner whose property is not entirely within the zone.
2. Protection of ecosystems is very obviously an Island-wide responsibility and is mentioned multiple times in [Bylaw 177](#), so there is no need for the proposed zone for this item. We would appreciate the Islands Trust leading education about removing invasive plant species.
3. All land on Gabriola participates in filtering run-off to protect our water, so there is no need for the proposed zone for this item. We understand the Local Trust Committee has commissioned a report on water on Gabriola. We anticipate there will be information that will be useful to all Gabriolans in this report, and proposed changes need to wait for analysis of its recommendations. Amending present bylaws to discourage paved driveways in favour of gravel will help with infiltration and filtering run-off, as can other techniques to detain and infiltrate rainwater. We hope a comprehensive list of these techniques will be provided to Gabriolans.
4. It is the responsibility of all residents of Gabriola to maintain the natural character of our entire Island, as has always been a part of the Islands Trust mandate. This item is also already covered in [Bylaw 177](#) in multiple entries. There is no need for the proposed zone for this objective.
5. Maintaining an adequate supply of groundwater to prevent saltwater intrusion in wells is already covered in the provincial [Water Sustainability Act](#) and the [fact sheet](#) provided by the Province.

Additionally, areas in British Columbia where intrusion may be a problem are [already mapped](#) with a 4-level vulnerability scale, and every licensed well driller has already been provided with this information. There is no need for the proposed zone for this concern because groundwater conservation is best managed at the watershed level; in this case, that is the whole of Gabriola Island. There is a need to ensure Islanders are educated about water-conserving choices like questioning the need for a daily shower, taking “sailor” showers, and the like; distribution of this [fact sheet](#) can help the Trust accomplish this.

Additionally, distribution of the [provincial guidelines for groundwater use in a drought](#) could be very helpful to Islanders. Note that the Province distributes these guidelines for all British Columbians, not just those in drought-prone areas, and asks that **everyone** take action to conserve water. The [BC Drought Map](#) currently shows Gabriola to be experiencing moderate drought. We wonder if all Gabriolans are aware of this.

Ensuring Islanders are aware of these guidelines would be an important education focus for the Islands Trust.

6. The preservation of archaeological and cultural sites is already being done *via* building permits and the Heritage Conservation Act. Further, as the text of the article notes, sites have been identified on shoreline areas **and beyond**, i.e., on areas of Gabriola outside the proposed zone. So, this proposed zone is not required for the preservation of any and all sites. A better approach is to supplement the current process with information distributed to Gabriolans on how to identify likely sites and important artifacts, etc. A map that identifies all known and high potential sites on Gabriola could be added to the bylaw document. [More on Heritage Conservation Areas below.]
7. While the article states that the shoreline buffer zone is not a regulation, it is indeed a regulation in its suggested need for Development Permits. This additional layer of administration amounts simply to a tax on people, and it is well known that taxpayers are already burdened. Our own Island has faced significant increases in taxes for our fire department for the last two years, and yet another is projected for next year. There was a full page of houses on the chopping block for unpaid taxes in a recent Nanaimo Bulletin. People are struggling! Do not ask us to pay more for unnecessary permits.
8. Management for flood, erosion risks and sensitive ecosystems are already set out in [Bylaw 177](#), and foreshore concerns are monitored by Fisheries & Oceans. Many of us have lived full-time on the Island for years, and we have not noticed much if any flooding along coastal areas; so, we do not believe this is even an issue, much less rationale for a buffer zone. Construction standards are already covered in the Building Code, and do not require duplication that can only bring on confusion, delays and frustration. “Low impact” foundations (whatever they are) may be a worthwhile goal, but it is certainly an Island-wide concern. Nothing in the text of the article on Development Permit Areas requires a shoreline buffer zone.
9. Regarding Heritage Conservation Areas, we are concerned about the reasoning behind any application. We were told that the Hesquiaht First Nation is proud of their negligible footprint on the Earth; and beyond the occasional culturally modified tree, their history of life on the land has not changed the land and its natural processes. It is very sad that precious petroglyphs on Gabriola are eroding, but that is natural process. Perhaps landowners and First Nations can jointly erect covers for some of the petroglyphs. Not only could this give the petroglyphs a longer life, it will build on the relationships already being established by the friendship offerings of the First Nations, as

evidenced by their gracious hosting of Oceans Day. But more important perhaps than protecting the petroglyphs themselves is protecting the reason for their creation, i.e., the possible sacredness of the site they represent.

Everyone understands the needs for spirituality and ancestral connection. These are needs that are common to all humans, regardless of one's faith or origin. The common understanding of these needs is part of what generates the empathy that supports Reconciliation.

More connection to First Nations is further generated by the increasing understanding by everyone of the connectivity to our environment and the requirement for our survival to protect it, a principle we understand to be deeply rooted in First Nations life.

So, we have a strong basis for a robust and enduring bond going forward among all Gabriolans, First Nations or not.

That bond, however, will be seriously damaged, perhaps even lost, if restrictions and obligations are imposed on a landowner, such as through this proposed zone or particularly due to a designation for Heritage Conservation. If the landowner wants to sell, such a designation can limit possible buyers and thereby require reductions in the sale price, reducing the equity that could be necessary if one has to relocate, for example, due to expropriation. While the text of the article says no plans for expropriation are in place, we can only take that as effective at time of writing. Tomorrow, the sweeping decision in favour of Aboriginal Title to private land by the judge in the [Cowichan Tribes/Richmond\\* case](#) may stand the test of our courts.

The uncertainty of unsettled land claims sabotages our ability to find peace with a process toward sacredness, like Heritage Conservation. Let's not lose sight of the Province's financial responsibility in land claims, which have an end, unlike sacredness, which continues. If proving First Nations use of the land is part of the land claims process, that is not the financial responsibility of landowners under the suggestion of Heritage Conservation for sacredness. What is needed is ongoing, up-to-date information (education) about the land claim settlement proposals on Gabriola because they affect all Gabriolans, not just those in the proposed zone. We can't let the temporary aspect of land claims settlements affect the bond we can have going forward in perpetuity.

10. It seems perhaps that the 200-metre shoreline buffer is being proposed primarily to flag the possibility of archaeological potential. This is already covered by the Heritage Conservation Act, so a shoreline buffer zone is not needed. What is needed is education about the present and soon-to-be revised Heritage Conservation Act.
11. There is already a process for variance to permit that applies to all of Gabriola. The proposed zone is not needed to activate that process.
12. Subdivision of lands on Gabriola for residential re-zoning has always involved a public process, and parcels of land large enough to subdivide are minimal in this proposed zone. There is no need for the proposed zone for this item as this is a Gabriola-wide issue.
13. Rezoning for additional units and secondary units on all of Gabriola is already limited due to property size and will likely remain that way until affordability dictates otherwise, so there is no need for the proposed zone for this item.

14. We all understand that extra care to protect all of Gabriola and other Gulf Islands is the reason we have the Islands Trust, so there is no need for the proposed zone for this item.
15. There is no “planning accordingly” for landowners when an archaeological assessment reveals significant items. It has already been for some Islanders a bottomless pit of expense and delay, and building costs are already outrageously high. Additionally, this item is covered already in the Heritage Conservation Act. Again, this proposed buffer zone simply duplicates legislation already in place, and as acknowledged already, archaeological significance is not limited to the proposed 200-metre buffer. It applies upland areas as well, so it applies to all of Gabriola. There is no need for this proposed zone.

We do, however, appreciate the aspect of providing the landowner with the ability to plan for costs. If the goal of identifying sacred sites can't be separated from establishing Reconciliation and land claims settlements, let's not place the entire financial burden for archaeological assessments on the landowner. Could a nominal amount payable by the landowner be established beyond which the Province picks up the tab? Perhaps the Province should pick up the entire tab; that way, all British Columbians share the cost and the burden is not placed on an individual landowner. First Nations may want to contribute as well.

16. The statement about property rights being maintained and the right to build are directly contradicted by the statement that confirms application of restrictions related to location, construction method, and setback, “etc.” If more restrictions are needed, they can be added to those already set out in [Bylaw 177](#). There is no need for the proposed zone for this item.
17. While existing buildings may be “grandfathered in” for this proposed zone, it is no comfort given that the proposed zone adds a level of administration that is not required.

In summary, while the article may suggest a shoreline buffer is a “tool,” it's clearly intended to be a set of rules that unnecessarily duplicate review processes already in place. Of more importance is its glaring avoidance of a focus on concerns as being Island-wide and unfairly holding to account some residents more than others. Further, it contributes to confusion and delay due to duplication of references to regulations, bylaws and guidelines already in place.

We ask that the Trustees to:

1. Continue to utilize and revise regulations, guidelines, rules, policies, etc. that apply to all Islanders and are already in place.
2. Provide ongoing updates on the progress of land claims settlements and how they are affected by archaeological finds; and commit to an open process for all stakeholders regarding plans for land claims settlements on Gabriola.
3. Build on the relationships already in place among First Nations and Gabriolans by educating Gabriolans about the roots of sacredness for the First Nations on sites on Gabriola. This will foster empathy and commitment to preserving these sites.
4. Quickly put forward a suggestion to add to the proposed amendments of the Heritage Conservation Act to include the stipulation of a nominal amount for landowners to pay for archeological assessments, with the Province paying for the remainder. First Nations may also want to contribute to the expense.
5. Instead of imposing zoning, choose education first because it builds rather than discourages relationships.

Thank you for considering our requests.

Sincerely,

Liz Steele and Terry Rollerson, [REDACTED]  
Julie Davies, [REDACTED]  
Michael Davies, [REDACTED]  
Barbara Hunt and Brian Hunt, [REDACTED]  
Roy Innes, [REDACTED]  
Peter Phillips, [REDACTED]  
Terry Stonehouse, [REDACTED]  
Luke van der Horst, [REDACTED]

\*The Claim Area, which the plaintiffs call the Lands of Tl'uq̓tinus, is located on what is now the south shore of Lulu Island, across from Tilbury Island, in Richmond, British Columbia. Today, land in the Claim Area is owned by the federal Crown, the Vancouver Fraser Port Authority ("VFPA"), the City of Richmond ("Richmond"), and private third parties. It covers approximately 1,846 acres of land, as well as certain surrounding lands held by Canada or Richmond. See the map attached to the reasons for judgment as Schedule "B", depicting the Federal Tl'uq̓tinus Lands and the Richmond Tl'uq̓tinus Lands.  
<https://www.bccourts.ca/jdb-txt/sc/25/14/2025BCSC1490.htm>