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Sent: Monday, September 14, 2026 2:49 PM
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Subject: ATTN: Manager of Regional & Community Planning & Electoral Area B Director

EXECUTIVE REFERRAL MEMORANDUM

TO: Regional District of Nanaimo (RDN) — Planning & Regional Services

DELIVERED VIA EMAIL / REFERRAL INTAKE

SUBJECT: Section 475 Local Government Act Referral — Draft Gabriola Island Official Community Plan (OCP) Bylaw: Regional Growth Strategy (RGS) Consistency, Watershed Alignment, and Inter-Jurisdictional Service Liability

EXECUTIVE SUMMARY

As part of the statutory referral process under Section 475 of the *Local Government Act* for the First Reading draft Gabriola Island Official Community Plan (OCP), this memorandum highlights key regional planning and infrastructure considerations for the Regional District of Nanaimo (RDN).

Gabriola Island (Electoral Area B) functions on a closed, singular bedrock aquifer system with zero mainland pipe connections. The First Reading draft OCP attempts to manage water protection through static, two-dimensional hazard mapping on surface plans—an approach that fails to reflect 3D hydrogeological fracture connectivity and risks creating localized water deficits in high-density areas.

To align with the **RDN Regional Growth Strategy (RGS Goal 2: Environmental Protection and Goal 5: Water Services)** and protect the RDN from future downstream service expectations or emergency water infrastructure liabilities, the RDN is urged to recommend an **Island-Wide Water Neutrality Mandate** in its formal Section 475 referral response to the Local Trust Committee (LTC).

KEY TECHNICAL CONCERNS FOR RDN REVIEW

1. RGS Policy Alignment & Service Boundary Risks

- **Growth vs. Carrying Capacity:** RGS Goal 2 requires land-use decisions to reflect true environmental carrying capacities. The First Reading draft OCP evaluates growth targets primarily against surface footprints rather than proven groundwater recharge bounds.

- **Preventing Downstream Service Demands:** Unchecked build-out without strict, island-wide water neutrality increases the long-term risk of localized groundwater failure during extended summer droughts. In rural electoral areas, severe aquifer depletion inevitably creates public pressure on the Regional District to intervene with costly municipal water haulage, emergency utility creation, or service expansion liabilities.

2. Inadequacy of Static Hazard DPAs vs. Regional Consistency

- **Fracture Compartment Dynamics:** Drawing static "Water Hazard Areas" on surface maps grants a false sense of security to developments outside mapped zones while connected to the same fractured sandstone matrix.
- **The Regional Standard Solution:** Replacing static hazard zones with a universal, island-wide requirement for **100% engineered rainwater harvesting and seasonal storage for net-new density** provides a clear, equitable, and enforceable standard that supports RDN liquid waste and water management objectives.

3. Inter-Jurisdictional Parks, Greenways, and Watershed Connectivity

- **High-Elevation Recharge Integrity:** High-elevation recharge zones (such as the Kensington Upland) feed down-gradient coastal aquifers and RDN regional park ecosystems alike. Preserving these recharge corridors through coordinated land-use policy protects shared regional natural assets.

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RECOMMENDED RDN SUBMISSION TO THE LOCAL TRUST COMMITTEE

It is requested that the RDN's official Section 475 referral reply to the Local Trust Committee include the following specific recommendations prior to the OCP advancing to Second Reading:

1. **Island-Wide Water Neutrality Mandate:** Recommend that the LTC replace static hazard mapping with a binding, island-wide Water Neutrality requirement in the OCP, mandating 100% rainwater harvesting and seasonal cistern storage for all net-new residential, commercial, and institutional density.
2. **Closing Groundwater Top-Up Loopholes:** Advise the LTC that rainwater harvesting requirements must be accompanied by extraction caps or metering provisions to ensure cisterns are not replenished from shared aquifers during peak late-summer drought periods.
3. **Formal Co-Governance & Watershed Table Integration:** Support the establishment of the **Gabriola Water Stewardship Table** as a permanent multi-jurisdictional coordinating body uniting the LTC, RDN Electoral Area B, Snuneymuxw First Nation, Island Health, and MoTI to oversee regional watershed health and climate adaptation.

4. **Biological Retention & Canopy Multipliers:** Encourage the integration of explicit biological retention targets in the OCP to maintain forest canopy and soil infiltration capacity across Electoral Area B.

Respectfully submitted for RDN consideration,

Ewout van Dishoeck

[Redacted Signature]

Gabriola Island, BC

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Copy provided to the Gabriola Island Local Trust Committee for the official Section 475 referral record.