Jennifer Margison

Galiano Island, BC

April 29, 2025

Galiano Local Trust Committee (LTC) and Planner Kim Stockdill Islands Trust

RE: Galiano Application 16.2 PL-RZ-2024-0003 (Palmberg) and April 8, 2024 Staff Report

Dear Members of the Local Trust Committee and Planner Stockdill,

I am writing to express my concerns regarding Galiano Application 16.2 PL-RZ-2024-0003 (Palmberg) and the associated Staff Report dated April 8, 2024. The application proposes a rezoning from Rural 2—which designates principal uses as residential and agricultural under the Official Community Plan—to a site-specific Rural 2 zone (Rural 2[a]).

If approved, the rezoning would allow additional industrial/commercial land uses not currently permitted under Rural 2 zoning, including:

- Contractor yard
- Storage and sale of gravel, soil, and aggregates
- Sawmill, planing, and manufacturing of wood products
- Cidery, brewery, and/or winery operations (including production, storage, and sales)

These industrial/commercial activities constitute a substantial change in land use, with significant implications for noise, traffic, and—most critically—water resources. I would like to focus specifically on the impact of this proposal on our limited freshwater supply.

Although the application lacks details on the size of the proposed cidery, brewery, or winery, it is well documented that all such operations, along with supporting agricultural uses (orchards, hops, vineyards), are water-intensive. Despite this, the April 8 Staff Report marks Freshwater Resource Directives 4.4.2 and 4.2.3 on the Trust Policy Directives Checklist of the Trust Policy Statement (TPS) as "N/A – Not Applicable." The Report also concludes that Draft Bylaws 296 and 297 are not contrary to or at variance with the TPS.

This omission is deeply concerning. While I understand that water studies have not yet been conducted for this application, the impact on water availability—especially for neighbouring properties—must be a fundamental consideration. The subject property is adjacent to and upslope from the Sticks Allison Community Water System well, which supplies water to 37 households. This CRD-managed system experienced a critical low

aquifer warning in 2021 and remains under summer conservation restrictions. The local water committee has also implemented additional conservation strategies, including reducing household usage limits before higher user fees apply.

Additionally, CRD Integrated Water Services was not listed among the referral agencies for this application—a concerning oversight.

When I raised these points at the April LTC meeting, the Planner noted that the CRD Integrated Water Services will be added as a referral. She also stated that the Directive Checklist could be revised by the LTC. Though it is stated in Policy 1.3.1 Policy Statement Implementation, *"The primary responsibility for demonstrating that an official community plan or regulatory bylaw is not contrary or at variance with the Islands Trust Policy Statement rests with each local trust committee...", the policy also states that <i>"Staff may use the Directives Checklist to assess whether bylaw amendment applications in process and bylaws prior to first reading comply with the Policy Statement."* Completing this Checklist accurately and advising the LTC on potential environmental impacts as the IT Mandate requires surely is the Planner's responsibility.

Freshwater is our most critical natural resource, and it is under increasing strain from residential growth, tourism, and climate change. A recent CBC article outlines how the Sunshine Coast—previously unaffected by water scarcity—had to declare a state of local emergency due to drought. The article specifically profiles a cidery forced to suspend operations due to water shortages:

https://www.cbc.ca/radio/whatonearth/drought-planning-1.7518702

By contrast, the Gulf Islands have a long-standing history of water challenges. With climate change accelerating, the risk of severe water shortages is only growing. Approving this rezoning now—with an extended 10-year rollout of multiple water-intensive uses—poses a serious threat to the surrounding area. We have no way of knowing what our water capacity will look like even two years from now, much less ten.

I support the development of local businesses. However, not all business proposals are appropriate for areas with constrained natural resources—especially water. Groundwater should be reserved for essential household use—not allocated to high-consumption industrial/commercial such as cideries, breweries, or wineries. While the creation of local jobs is important, those jobs will not be sustainable if the water supply fails—and risking the community's water to support them is too high a cost.

I respectfully urge the LTC and the Planner to proceed with the utmost caution in reviewing this rezoning application, fully considering the limitations of our freshwater resources, the critical needs of adjacent properties and the precautionary principle in our OCP.

Sincerely, Jennifer Margison

c.c. Reuban Bronee, CAO, Islands Trust