



DATE OF MEETING: April 19, 2022  
TO: Salt Spring Island Local Trust Committee  
FROM: Jason Youmans, Island Planner  
Salt Spring Island Team  
COPY: Salt Spring Island Watershed Preservation Alliance (SSIWPA)  
SUBJECT: SSIWPA Situation Analysis and Options Identification / SSIWPA budget / First Nations  
Engagement

## RECOMMENDATION

1. That the Salt Spring Island Local Trust Committee receive the Situation Analysis and Options Identification Report included as Appendix 1 in the staff report of April 19, 2022.
2. That SS LTC continue to fund the SSIWPA coordinator up to \$60,000 for fiscal 2022/23, and authorize spending up to \$11,660 from unspent special property tax requisition funds from previous fiscal years to cover SSIWPA's meeting, events, and communications costs.

## REPORT SUMMARY

This staff report provides the Salt Spring Island Local Trust Committee (SS LTC) with a situation analysis and options identification report from Econics Services (Appendix 1) concerning the coordination of watershed protection efforts on Salt Spring Island. It also provides SS LTC with options for the Salt Spring Island Watershed Protection Alliance (SSIWPA) budget in light of the Islands Trust Council's decision to reduce the annual special property tax requisition for the service from \$75,500 to \$60,000, as well as a discussion of the First Nations engagement element of Phase 2 of the SS LTC's Watershed Stewardship and Protection Strategic plan.

This staff report makes two recommendations:

- 1) That SS LTC receive the Situation Analysis and Options Identification Report prepared by Econics Services and;
- 2) That SS LTC continue to fund the SSIWPA coordinator up to \$60,000, and authorize spending up to \$11,500 from unspent special property tax requisition funds from previous fiscal years to cover SSIWPA's meeting, events and communications costs.

It does not make any recommendations concerning First Nations engagement in Phase 2 of the Watershed Stewardship and Protection Strategic Plan, but does flag the tension between project timelines and meaningful First Nations engagement that has to be acknowledged, and may have to be addressed as the project advances.

## **BACKGROUND**

### *SSIWPA Situation Analysis and Options Identification Report*

In October, 2021 SS LTC adopted a project charter for the development of a watershed stewardship and protection strategic plan for Salt Spring Island (Appendix 2). Phase 1 of this plan was to be a qualitative assessment of SSIWPA's performance along with a discussion of alternative options and recommendations for how to improve the Island's coordination of watershed stewardship and protection. This report is now complete and is included as Appendix 1 to this staff report.

### *SSIWPA Budget and Special Property Tax Requisition*

At its March 2022 meeting Islands Trust Council adopted a budget that included a special property tax requisition for the Salt Spring Island Local Trust Area in the amount of \$60,000 to fund the coordination of watershed protection efforts. The adopted requisition now leaves an \$11,660 funding gap relative to the endorsed SSIWPA budget and workplan for fiscal 2022/23.

This \$60,000 special property tax requisition represents a \$15,500 reduction from the \$75,500 that was requisitioned in fiscal 2021/22 and 2020/21 and is a significant reduction from the \$98,500 that was requisitioned in fiscal 2017, 2018 and 2019 which was in turn further reduced from the \$110,000 annual requisition that started in fiscal 2014.

### *Salt Spring Island Watershed Stewardship and Protection Plan – Phase 2 – First Nations Engagement*

The project charter for the Salt Spring Island Watershed Stewardship and Protection Strategic Plan indicates that the project will "Engage First Nations in discussion about how they could be involved in water policy coordination."

At its October 10, 2021 meeting, SS LTC endorsed the First Nations Engagement Strategy attached as Appendix 4.

Furthermore, the recently adopted federation-wide Islands Trust Freshwater Sustainability Strategy contains the following proposed actions for Islands Trust to undertake in respect of freshwater resources in the Trust Area:

CKE 1 – Identify freshwater sites of cultural and spiritual significance to First Nations;

CKE 2 – Collaborate with First Nations and Indigenous organizations to increase community awareness of water-related cultural values, interests, and inherent rights; and

COA 1 – Collaborate with First Nations and Indigenous organizations to develop understanding and integrate their participation, perspectives, and interests into water-related decision making by all agencies.

It is also worth noting that the provincial government recently released its Action Plan to implement the Declaration on the Rights of Indigenous People Act (DRIPA) which contains the following action that will impact local governments:

- 1.11 Support inclusive regional governance by advancing First Nations participation in regional district boards.

## ANALYSIS

### Issues and Opportunities

#### *SSIWPA Situation Analysis and Options Identification Report*

The Situation Analysis and Options Identification report makes five recommendations as follows:

**Recommendation 1:** internalize watershed protection coordination as an operational function within Islands Trust, including the following steps:

- integrate activities currently done under SSIWPA with Islands Trust’s work on the federation wide Freshwater Sustainability Strategy and related functions;
- discontinue use of the independent SSIWPA brand identity, including the logo, Internet domain, and title, in favour of applying Islands Trust’s corporate brand to all internal and external communications going forward;
- continue a steering committee with revised terms of reference as an Islands Trust advisory committee and with a chair elected from its membership;
- continue to deliver watershed protection coordination services from Islands Trust’s Salt Spring Island office; and,
- continue to staff a coordinator position; improve integration the coordinator’s workplan with Freshwater Sustainability Strategy implementation.

**Recommendation 2:** in coordination with the Provincial Government and CRD, develop and implement a plan to improve engagement with First Nations on watershed protection and governance based on the principles set out in Islands Trust’s Reconciliation Action Plan and in the spirit of Islands Trust Reconciliation Declaration.

**Recommendation 3:** in collaboration with the Provincial Government and CRD, develop a policy or operational guideline for how volunteer/community science will be used in regulatory decision making based on national best practice.

**Recommendation 4:** develop a multi-agency, multi-year watershed protection strategy for Salt Spring Island in the next phase of this project; ensure this plan is nested under and integrated with Islands Trust’s Freshwater Sustainability Strategy.

**Recommendation 5:** through a structured decision-making process, strive to develop consensus on preferred longer term governance reforms to improve watershed protection based on the evaluation criteria and options set out in the body of the report.

SS LTC will see that the Phase 1 report concludes that it is difficult to disentangle the issue of watershed coordination from the greater governance challenges facing Salt Spring Island and on that basis the recommended interim solution is to reform the watershed protection coordination function such that it is brought under closer Islands Trust oversight and that the SSIWPA name and brand retired.

This recommended interim option, along with the other potential reconfigurations explored in the report, has benefits and drawbacks. Staff are unprepared to endorse specific actions on these recommendations at this point, and would reserve such until SS LTC has the opportunity to discuss the Econics report, identify what it considers to be SSIWPA’s shortcomings that should be addressed, and request staff to develop a plan to address those

shortcomings or action the recommendations of the Phase 1 report. Furthermore, SS LTC may wish to wait until Phase 2 of the Watershed Stewardship and Protection Plan is complete before taking action on Phase 1, as the latter may inform the former. Implementation of the report's primary recommendation would, at minimum, require a budget case for the 2023/24 fiscal year that may, or may not, align with Phase 2 of the watershed plan and local elections.

Staff note that recommendation 4 is already underway.

#### *SSIWPA Budget and Special Property Tax Requisition*

Islands Trust Council's decision to reduce the Salt Spring Island Local Trust Area special property tax requisition from the proposed \$75,500 to \$60,000 may impact SSIWPA's functioning depending on how SS LTC wishes to see that money allocated. The SSIWPA budget and workplan for fiscal 2022/23 envisioned total spending of \$71,660. See Appendix 3 for the anticipated spending breakdown. Given the proposed budget, staff present three potential scenarios SS LTC could consider given the reduced special property tax requisition:

##### Scenario 1

###### Carry out all SSIWPA activities within the \$60,000 raised through the special property tax requisition

This scenario assumes that SS LTC wishes to maintain the meeting costs and events/communications initiatives identified in the fiscal 2022/23 workplan. If this is the case, the coordinator's compensation would have to be capped at \$48,340 (\$60,000 less the \$11,660 value of meeting costs and event/communications costs).

Staff caution that a reduction in the coordinator's billable hours may result in an inability to complete event/communications projects, as in recent years this is where the SSIWPA coordinator has focused a considerable amount of their time. In fiscal 2021/22 the coordinator billed for the full value of the current contract. It is not clear whether the current SSIWPA coordinator would be willing to continue to provide the service at this reduced rate.

##### Scenario 2

###### Carry out all SSIWPA activities within the \$60,000 raised through the special property tax requisition, but reduce scope

This scenario assumes that SS LTC is willing to forego some of the spending identified in the 2022/23 SSIWPA budget and workplan. For example, if SS LTC determines that it does not want to see any communications materials developed during the fiscal year, it could amend the budget to remove that \$5,200 item and redirect that money to SSIWPA coordinator compensation.

##### Scenario 3

###### Carry out all SSIWPA activities identified in the 2022/23 workplan and budget and use unspent requisition funds from previous fiscal years as needed to meet budget requirements.

This scenario would see the SSIWPA workplan actioned in accordance with the budget in Appendix 3. Doing so would require using unspent special property tax requisition funds from previous fiscal years to meet the shortfall left by the \$60,000 special property tax requisition. Staff understand there to be at least \$15,000 in unspent special property tax requisition funds available for this purpose that have not already been allocated to other water sustainability projects (Weston Lake Climate Change and Water Availability Assessment, Salt Spring Island Watershed Stewardship and Protection Strategic Plan).

Staff are awaiting confirmation from the Director of Administrative Services as to the implications of using the unspent property tax requisition funds for this purpose and will update SS LTC at its April 19 meeting.

### *Salt Spring Island Watershed Stewardship and Protection Plan – Phase 2 – First Nations Engagement*

Staff are struggling to reconcile potential project timelines with the need to undertake meaningful engagement with First Nations in the development of the plan.

The consultant hired to undertake the work has advocated for a compressed timeline, such that Phase 2 of the plan would be largely complete by June 2022. This short timeline would be possible because the project will build on the extensive strategic planning work that has already been undertaken by SSIWPA over the past several years.

This timeline, however, would not allow for the depth of First Nations engagement that actions laid out in the Islands Trust Freshwater Sustainability Strategy cited above would seem to demand. Over the past few months planning staff have been in correspondence with staff from area Nations and organizations with whom Islands Trust has been building relationships about their interest in the project and capacity for participation. While these conversations have revealed some level of interest in the initiative they have not yielded a concrete plan for their participation. WSÁNEĆ Leadership Council staff, for example, have indicated that they do not have capacity to participate in this project. Indeed, planning staff anticipate that it could be several more months before concrete commitments could be established.

Staff will implement the First Nations Engagement Strategy as endorsed by SS LTC (Appendix 4) with the intent that a draft report be ready ahead of the October 2022 local government elections. Nonetheless, staff are obliged to flag that this approach may not engage First Nations at the level that would be ideal under Islands Trust's reconciliation commitments. This tension between timelines and robust engagement is not unique to this project, but rather is representative of where Islands Trust finds itself in the journey toward building better relationships with the Nations who have treaty and territorial interests in the Islands Trust Area. Suffice it to say, flexibility to address First Nations interests will be required as the project advances.

Staff have a meeting planned with a representative from the Centre for Indigenous Environmental Resources that staff hope may yield new opportunities for First Nations engagement in this project and will update SS LTC on the results of this conversation at the April 19 SS LTC meeting.

## Rationale for Recommendation

- 1. That the Salt Spring Island Local Trust Committee receive the Situation Analysis and Options Identification Report included as Appendix 1 in the staff report of April 19, 2022.**

As noted above, the recommendations contained in the Phase 1 report warrant some SS LTC discussion before staff recommend a path toward their implementation.

- 2. That SS LTC continue to fund the SSIWPA coordinator up to \$60,000 for fiscal 2022/23, and authorize spending up to \$11,500 from unspent special property tax requisition funds from previous fiscal years to cover SSIWPA's meeting, events, and communications costs.**

Staff recommend that the status quo for funding SSIWPA's work be maintained, despite the reduction in the special property tax requisition for fiscal 2022/23.

## ALTERNATIVES

### SSIWPA Situation Analysis and Options Identification Report

- 1. Request Amendments Prior to Receiving the Report**

If there are elements of the report that SS LTC believes require revision before it is accepted SS LTC could request staff to undertake those amendments and return with a revised report at a future meeting. If SS LTC pursues this alternative, it should be specific about the amendments that it is seeking.

If the LTC wishes to take this option it could pass the following resolution:

*That the Salt Spring Island Local Trust Committee request staff to make the following amendments to the Situation Analysis and Options Identification report included as Appendix 1 in the staff report of April 19, 2022:*

- 1) . . . .
- 2) . . . .

The implications of this resolution are that staff would return at a future meeting with a revised report for SS LTC's consideration.

- 2. That the Salt Spring Island Local Trust Committee request staff to develop a plan to implement the recommendations of the Situation Analysis and Options Identification Report included as Appendix 1 in the staff report of April 19, 2022.**

If SS LTC is confident that the recommendations contained in the Phase 1 report will improve coordination of watershed stewardship and protection on Salt Spring Island it can request staff to develop a plan to implement those recommendations.

### SSIWPA Budget and Special Property Tax Requisition

- 1. Amend SSIWPA Budget**

If SS LTC wishes to undertake all SSIWPA-related activities within the \$60,000 ceiling of the fiscal 2022/23 special property tax requisition it should amend the previously-endorsed SSIWPA budget to indicate where it would like to reduce expenditures. Such reductions could come either in the form of reduced coordinator

compensation, fewer meetings, or reduced events and communications initiatives. As noted above, there is an \$11,660 gap between the special property tax requisition and the endorsed SSIWPA budget (Appendix 3).

SS LTC could consider the following resolution:

*That the Salt Spring Island Local Trust Committee request staff to amend the SSIWPA budget as follows:*

1) . . . . .

2) . . . . .

The implications of this resolution are that reducing the coordinator’s compensation may impact the willingness of the current coordinator to continue their participation in the project. Reducing the number of meetings or events/communications initiatives may impact SSIWPA’s community profile.

**NEXT STEPS**

Staff will execute the directions of the SS LTC in respect of the foregoing issues.

Submitted By:	Jason Youmans, Island Planner	April 7, 2022
Concurred By:	Stefan Cermak, Regional Planning Manager	April 7, 2022

**ATTACHMENTS**

1. Situation Analysis and Options Identification Report, 2022
2. Project Charter – Salt Spring Island Watershed Stewardship and Protection Plan, v1.1
3. SSIWPA Budget and Workplan – 2022/23
4. First Nations Engagement Strategy – Watershed Stewardship and Protection Strategic Plan – Endorsed October 10, 2021

**Islands Trust**

**Salt Spring Island Watershed Stewardship and  
Protection Coordination  
Situation Analysis and Options Identification Report**

**April 2022**

Prepared for



Prepared by





## Table of Contents

Executive Summary .....	ii
1.0 Introduction .....	1
1.1 Methodology .....	1
1.2 Limitations .....	2
2.0 Background .....	3
2.1 Watershed Protection and Stewardship Jurisdictions .....	3
2.2 SSIWPA Overview .....	4
2.3 SSIWPA History .....	10
2.4 Highlights of SSIWPA Accomplishments .....	10
2.5 Policy Context .....	12
2.6 Recent Strategic Planning .....	12
3.0 Research Findings .....	13
3.1 SSIWPA Fulfills its Role as a “Big Tent” .....	13
3.2 SSIWPA’s Unincorporated Status and Limited Authority .....	13
3.3 SSIWPA’s Autonomous Brand Identity .....	14
3.4 Capacity and Mandate Versus Member Expectations .....	14
3.5 Procedural and Governance Issues .....	16
3.6 Facilitating Volunteer Science .....	16
3.7 Engagement with First Nations .....	17
3.8 Desire for Local Control .....	17
3.9 Long Range Planning .....	18
3.10 Despite the Challenges, Participants Value SSIWPA .....	18
3.11 Broader Governance Quandaries .....	19
3.12 Synthesis .....	19
4.0 Options for Watershed Protection Governance and Coordination .....	21
4.1 Status Quo (or Modified Status Quo) .....	21
4.2 Internalize Coordination Function within Islands Trust .....	22
4.3 Transfer Coordination Function to CRD .....	23
4.4 Incorporate SSIWPA as a Not-for-Profit Organization .....	24
4.5 Create Ministerial Advisory Board under the <i>Water Sustainability Act</i> .....	24
4.6 Transfer the Coordination Function to the Provincial Government .....	25
4.7 Transfer Coordination Function to New Local Authority .....	26
5.0 Summary and Recommendations .....	28
6.0 Conclusion .....	30
7.0 References .....	31
Appendix 1: Methodology .....	35
Appendix 2: Water Service Providers and Jurisdictional Responsibilities .....	38
Appendix 3: 2019 SSIWPA Priority Problems and Actions “Report Card” .....	40

## List of Tables

Table 1: Water Management Partners on Salt Spring Island .....	3
Table 2: SSIWPA Membership (2021) .....	5
Table 3: SSIWPA Workplan (1 April 2021 to 31 March 2022) .....	8
Table 4: SSIWPA Timeline .....	11
Table 5: Options for Watershed Protection Coordination .....	21

## Executive Summary

Multiple players have roles in watershed stewardship and protection on Salt Spring Island. This includes Provincial, Federal, First Nations, and local governments, health authorities, water service providers, industry, and volunteer residents acting through stewardship groups and other community non-governmental organizations. Given the significant water sustainability challenges facing the island, coordinating this effort is no small undertaking.

For the past nine years, coordination has been spearheaded through the Salt Spring Island Watershed Protection Alliance (SSIWPA), a forum established by Islands Trust to harmonize management among the agencies responsible for regulation and policy for watersheds and freshwater.

The purpose of this report is to provide a situation analysis that reviews the current approach to coordinating watershed protection on Salt Spring Island. It focuses primarily on SSIWPA, including current strengths and weaknesses, how its work might be improved, and alternatives to it. It evaluates seven alternative governance options and makes recommendations for future enhancements.

The report was informed by semi-structured virtual interviews with 15 informants, two workshops with individuals involved with SSIWPA, and a literature review of several dozen documents.

### **Background**

SSIWPA was established in 2013. This followed Islands Trust Council's approval of Bylaw 154 in the same year, which delegates certain powers around watershed protection coordination to the Salt Spring Island Local Trust Committee, noting that this bylaw does not actually mandate establishing a coordinating committee or forum. Five key attributes define SSIWPA:

1. a steering committee,
2. a technical working group,
3. a dedicated budget,
4. a contracted coordinator position, and
5. an independent brand.

### **Research Findings**

Key report findings are as follows:

- There was widespread (though not universal) agreement that SSIWPA does serve its primary intended function of bringing together many of the involved government agencies and non-governmental organizations. It provides a forum that allows people with different backgrounds, opinions, and interests to gather, acts as a sounding board for new policies, and advises on technical and operational projects as they develop.
- In legal terms, SSIWPA is an “unincorporated” forum, meaning that it is not mandated under legislation, regulation, or bylaw, nor is it a society, registered charity, business corporation, or any kind of legal entity. It operates at arm's length from Islands Trust, its sponsoring organization.

- When SSIWPA was first established, a decision was made to vest it with its own brand identity (e.g., logo, website domain, etc.) almost completely autonomous of Islands Trust. The continuation of this almost certainly contributes to heightened expectations of what SSIWPA can deliver on its own. The current approach also makes it very difficult for residents to connect SSIWPA's activities to the taxes they pay to Islands Trust.
- The most common complaint we heard about SSIWPA concerns its limited jurisdictional authority flowing from its unincorporated status and the constraints imposed under Islands Trust Bylaw 154. Typically, this was articulated as frustration that SSIWPA cannot, as many interviewees and others put it, "do things". We understand this to mean that it typically does not commission studies and projects, particularly technical and scientific ones, independent of its participating agencies.
- We heard concerns about two procedural and governance matters. First, some members questioned the need for segregated voting rights among Steering Committee members given that SSIWPA has little decision-making authority. Second, some informants questioned whether it is appropriate for an elected official, an Islands Trust Trustee, to chair the forum.
- Since its outset, SSIWPA has had challenges with facilitating the inclusion of volunteer/community science produced by its members in agency decision making. This was an acute challenge in the mid-2010s around water quality science work involving St. Mary Lake. However, it continues today in a more muted form.
- Thirteen First Nations have treaty and territorial interests in Salt Spring Island and its surrounding waters. Attempts to engage these Nations and Indigenous organizations to become involved in SSIWPA or its activities have been scarce. If SSIWPA's main task is coordination among agencies and organizations with interest in watershed protection, the absence of concerted effort to engage Nations and offer them a meaningful role at the SSIWPA table stands out as a deficiency.
- A recurrent theme from interviews was a desire that decisions and coordination activities be delivered directly from Salt Spring Island. This is driven by wanting to maintain control locally, but also for reasons of cost effectiveness.
- There was a general agreement among interviewees that SSIWPA is hampered by the absence of a long-term, multi-agency strategic plan for watershed stewardship on Salt Spring Island.
- Despite the many challenges, participants value SSIWPA and the unique role it plays in watershed protection on Salt Spring Island. In particular, they mention the important role of the coordinator to maintain momentum and workplan tracking.
- Participants recognize that problems with SSIWPA are intractably wrapped up in larger governance issues facing the island. Broader governance reform is seen to offer potential benefits including reduced administrative fragmentation and clarified responsibility for watershed protection.

## Options for Watershed Protection Governance and Coordination

We identify seven options for watershed protection coordination governance arrangements for the future. These are itemized roughly in order of how difficult they would be to implement based on current legislative, regulatory, and bylaw authorities (and therefore presumably how long they might take to realize).

1. status quo
2. internalize coordination function within Islands Trust
3. transfer coordination function to Capital Regional District (CRD) under a new or existing service under the *Local Government Act*
4. incorporate SSIWPA as an independent not-for-profit organization
5. create a ministerial advisory board under the *Water Sustainability Act*
6. transfer the coordination function to the Provincial Government under a water sustainability plan or area-based regulation under the *Water Sustainability Act*
7. transfer the function to a not-yet-existent local water services and/or watershed protection authority

## Recommendations

The report stops short of recommending a preferred long-term governance option for watershed protection coordination from the list above. Instead, we recommend an interim solution. We do so for two reasons.

First, conversations with SSIWPA participants over the course of this project indicate that, while there is widespread appetite for governance reform, preferences for what this should look like vary dramatically.

Second, there are broader governance reform discussions underway on Salt Spring Island that need time to unfold. This cautions against piecemeal restructuring narrowly focused on watershed protection coordination.

While these discussions progress, we recommend the interim approach set out below as a path to address some of the most immediate issues identified above. Principally, this includes managing participant expectations, improving engagement with First Nations, addressing procedural concerns, and the issue of SSIWPA's lack of authority in its own right.

**Recommendation 1:** internalize watershed protection coordination as an operational function within Islands Trust, including the following steps:

- integrate activities currently done under SSIWPA with Islands Trust's work on the federation wide Freshwater Sustainability Strategy and related functions;
- discontinue use of the independent SSIWPA brand identity, including the logo, Internet domain, and title, in favour of applying Islands Trust's corporate brand to all internal and external communications going forward;
- continue a steering committee with revised terms of reference as an Islands Trust advisory committee and with a chair elected from its membership;
- continue to deliver watershed protection coordination services from Islands Trust's Salt Spring Island office; and,

- continue to staff a coordinator position; improve integration of the coordinator’s workplan with Freshwater Sustainability Strategy implementation.

In parallel, we also recommend the following:

**Recommendation 2:** in coordination with the Provincial Government and CRD, develop and implement a plan to improve engagement with First Nations on watershed protection and governance based on the principles set out in Islands Trust’s Reconciliation Action Plan and in the spirit of Islands Trust Reconciliation Declaration.

**Recommendation 3:** in collaboration with the Provincial Government and CRD, develop a policy or operational guideline for how volunteer/community science will be used in regulatory decision making based on national best practice.

**Recommendation 4:** develop a multi-agency, multi-year watershed protection strategy for Salt Spring Island in the next phase of this project; ensure this plan is nested under, and integrated with, Islands Trust’s Freshwater Sustainability Strategy.

**Recommendation 5:** through a structured decision-making process, strive to develop consensus on preferred longer term governance reforms to improve watershed protection based on the evaluation criteria and options set out in the body of the report.

## 1.0 Introduction

Multiple players have roles in watershed stewardship and protection on Salt Spring Island. This includes Provincial, Federal, First Nations, and local governments, health authorities, water service providers, industry, and volunteer residents acting through stewardship groups and other community non-governmental organizations. Given the significant water sustainability challenges facing the island, coordinating this effort is no small undertaking.

For the past nine years, coordination has been spearheaded through the Salt Spring Island Water Protection Alliance (SSIWPA), a forum established by Islands Trust in 2013 to harmonize management among the agencies responsible for regulation and policy on various aspects of watersheds and freshwater resources.

The purpose of this report is to provide a situation analysis that reviews the current approach to coordinating watershed protection on Salt Spring Island. It focuses primarily on SSIWPA, including current strengths and weaknesses, how its work might be improved, and alternatives to it. It evaluates seven alternative governance options and makes recommendations for future enhancements.

Econics was selected to complete this review through a competitive procurement process based on our experience with similar programs across Canada and previous program evaluation projects. We are a Victoria-based firm whose mission is to help sustain water systems and the communities that depend on them.

Following this introduction, the report has four main sections, as follows:

- Section 2 provides a brief history of watershed protection coordination over the past decade and an overview of SSIWPA,
- Section 3 summarizes research findings,
- Section 4 identifies and evaluates alternative governance arrangements for watershed protection coordination, and
- Section 5 provides a summary and recommendations.

## 1.1 Methodology

This report was informed by the three primary sources:

- **Interviews** - fourteen interviews were conducted involving 15 informants (one session included two people). Interviewees included staff, contractors, elected officials, and volunteers from Islands Trust, the Capital Regional District (CRD), water service providers, the Provincial Government, and community non-governmental organizations.
- **SSIWPA Workshop** - a virtual workshop was held on 13 December 2021, involving 17 attendees from the SSIWPA Steering Committee, its Technical Working Group, and support staff from government agencies. A follow-up session with the Steering Committee took place on 28 January 2022.
- **Literature Review** - we reviewed several dozen documents provided to us by Islands Trust staff, contractors, or other sources. These documents provided context for the program review and are referenced throughout this report (see section 7).

Collectively, research participants painted a comprehensive picture of their understanding and attitudes about watershed protection coordination on Salt Spring Island and SSIWPA's role. Additional details on the project methodology can be found in Appendix 1.

## **1.2 Limitations**

The reader should be aware of several limitations. First, due to scope constraints, our work is not a formal performance or financial audit of SSIWPA. Rather, it is a general review informed by interactions with a group of key stakeholders and examination of resources largely directed to us by Islands Trust staff and contractors. Despite this, we are confident that the report provides an objective and well-informed assessment of SSIWPA's work to date.

Second, the summary in the body of the report focuses on program highlights - major achievements and identified challenges. It should be noted that a great deal of work has been completed over the past eight years by Islands Trust staff, contractors, and partners either directly under SSIWPA or related to it, far more than what can be detailed here.

Third, we did not engage directly with any of the 13 First Nations with treaty and territorial interests on Salt Spring Island and its surrounding waters. This is mainly because this report is largely retrospective in nature and, since SSIWPA's inception in 2013, no First Nation has been extensively involved in this forum directly. This issue is discussed further in section 3.7 and elsewhere below.

## 2.0 Background

This section provides background on watershed protection and stewardship on Salt Spring Island, SSIWPA, and some relevant recent strategic policy and planning context.

### 2.1 Watershed Protection and Stewardship Jurisdictions

Responsibility for water management on Salt Spring Island is shared among 13 First Nations, four Federal Government agencies, six Provincial Government agencies, a health authority, two local government agencies, four improvement districts, several strata and private water service providers, community groups, and the private sector. Table 1, below, provides an extensive but still incomplete list of the many players involved. Appendix 2 provides an overview of drinking water systems and a matrix that demonstrates the intricate nature of jurisdictional responsibility. With this “messy” regulatory and service provision landscape, and considering the real water sustainability challenges, the need for a coordination is evident.

**Table 1: Water Management Partners on Salt Spring Island**

<b>First Nations</b>	
<ul style="list-style-type: none"> <li>• BOKÉCEN (Pauquachin) First Nation</li> <li>• Cowichan Tribes</li> <li>• Halalt First Nation</li> <li>• Lake Cowichan First Nation</li> <li>• Lyackson First Nation</li> <li>• MÁLEXEŁ (Malahat) Nation</li> <li>• Penelakut Tribe</li> </ul>	<ul style="list-style-type: none"> <li>• SEMYOME (Semiahmoo) First Nation</li> <li>• SẂÁUTW_ (Tsawout) First Nation</li> <li>• Stz'uminus (Chemainus) First Nation</li> <li>• Tsawwassen First Nation</li> <li>• WJOŁEŁP (Tsartlip) First Nation</li> <li>• WŚIKEM (Tseycum) First Nation</li> </ul>
<b>Federal Government</b>	
<ul style="list-style-type: none"> <li>• Fisheries and Oceans Canada</li> <li>• Natural Resources Canada</li> </ul>	<ul style="list-style-type: none"> <li>• Geological Survey of Canada</li> <li>• Water Survey of Canada</li> </ul>
<b>Provincial Government</b>	
<ul style="list-style-type: none"> <li>• Ministry of Agriculture, Food and Fisheries</li> <li>• Ministry of Environment and Climate Change Strategy</li> <li>• Ministry of Transportation and Infrastructure</li> <li>• Ministry of Health</li> </ul>	<ul style="list-style-type: none"> <li>• Ministry of Forests, Lands, Natural Resource Operations and Rural Development</li> <li>• Ministry of Land, Water and Resource Stewardship</li> </ul>
<b>Regional/Local Government</b>	
<ul style="list-style-type: none"> <li>• Islands Trust</li> <li>• Capital Regional District</li> </ul>	<ul style="list-style-type: none"> <li>• Island Health</li> <li>• Improvement districts</li> </ul>
<b>Non-Government Entities</b>	
<ul style="list-style-type: none"> <li>• Stratatas and other water purveyors</li> </ul>	<ul style="list-style-type: none"> <li>• Community and stewardship groups</li> </ul>
<b>Other</b>	
<ul style="list-style-type: none"> <li>• Agricultural sector</li> <li>• Development sector</li> <li>• Education sector</li> <li>• Hydrogeologists, hydrologists, and other technical professionals</li> </ul>	<ul style="list-style-type: none"> <li>• Irrigation and landscaping sector</li> <li>• Planning sector</li> <li>• Water service sector</li> <li>• Private landowners</li> </ul>

Source: adapted from Islands Trust (2021a); may not be comprehensive



## 2.2 SSIWPA Overview

SSIWPA was established in 2013. This followed Islands Trust Council’s approval of [Bylaw 154](#) in the same year, which delegates certain powers around watershed protection coordination to the Salt Spring Island Local Trust Committee, noting that this bylaw does not actually mandate any particular coordinating committee or forum.<sup>1</sup>

As discussed further below, SSIWPA is an “unincorporated” forum, not a legal entity. As such, the existence and *raison d’etre* of both SSIWPA and its governing Steering Committee are both constituted by Terms of Reference endorsed by the Salt Spring Island Local Trust Committee and by the Steering Committee itself.

Under the current Terms of Reference, which have been amended seven times since 2013, the purpose of SSIWPA is to:

- “provide a framework for freshwater resources in the Salt Spring Island Local Trust Area to be managed in a manner that integrates and considers both human and ecosystem needs through integrated planning, policy development and recommendations for implementation by member agencies and organizations;
- advise on policies of regional, local, and provincial government organizations that are related to freshwater resources; [and,]
- coordinate the implementation of those policies.” (SSIWPA, 2021)

Five key attributes define SSIWPA:

1. a steering committee,
2. a technical working group,
3. a dedicated budget,
4. a contracted coordinator position, and
5. an independent brand.

Details on each of these attributes are discussed next.

### 2.2.1 Steering Committee

Membership in SSIWPA’s Steering Committee has evolved over time and currently includes the organizations listed in Table 2. Its role and conduct are established by the Terms of Reference. These set out 11 different objectives, including to make recommendations to member agencies, share information, engage the community, support outreach and education, seek funding, and develop strategies.

Under the Terms of Reference, consensus decision-making is preferred. However, in the event that this fails, there is a formal decision-making procedure under which participants are assigned different authorities. For example, members-at-large and attending agency staff are

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<sup>1</sup> Islands Trust Council Bylaw No. 154: A Bylaw to Delegate Certain Powers of the Islands Trust Council to the Salt Spring Island Local Trust Committee Related to Preservation and Protection of Water Resources in the Salt Spring Island Local Trust Area.  
<https://islandstrust.bc.ca/wp-content/uploads/2020/05/TCbylaw154delegationpowers.pdf>

not entitled to vote on formal decisions, noting that most decisions are made by consensus (see SSIWPA, 2021a, p. 4).

Under the Terms of Reference, First Nations with treaty and territorial interests and areas on Salt Spring Island are offered voting seats on the Steering Committee (up to three seats). However, to date these have gone unfilled.

Meetings are held at least quarterly and more often if required. Atypical of forums of this kind in our experience, the Steering Committee is chaired by an elected official, an Islands Trust Trustee.<sup>2</sup> A regular meeting might be attended by 15 or 20 participants including staff advisors and the SSIWPA coordinator.

**Table 2: SSIWPA Membership (2021)**

Islands Trust Salt Spring Island Local Trust Committee Capital Regional District Ministry of Forests, Lands, Natural Resource Operations and Rural Development First Nations (up to 3 seats)* Beddis Water Service Area Commission Cedar Lane Water Service Area Commission Cedars of Tuam Water Service Area Commission* Fernwood-Highland Water Service Area Commission* Fulford Water Service Area Commission Harbourview Improvement District* Mt. Belcher Improvement District* North Salt Spring Waterworks District Scott Point Waterworks District
<b>Members at-large organizations:</b> Cusheon Lake Stewardship Committee Salt Spring Island Conservancy Salt Spring Island Water Preservation Society Salt Spring Water Company Salt Spring Island Agricultural Alliance Transition Salt Spring Society
<b>Member agencies participating on a project basis:</b> Ministry of Agriculture Ministry of Health (Island Health) Ministry of Environment and Climate Change Strategy

\* denotes seats currently not filled

Source: Adapted from <https://www.ssiwpa.org/about/steering-committee>

### 2.2.2 Technical Working Group and Other Standing Committees

The Terms of Reference provide that the steering committee may appoint members of standing committees or working groups. The most enduring example of this has been the Technical Working Group, which has its own terms of reference and, currently, [five members](#). This includes staff representatives from CRD and Islands Trust and three community members who have relevant technical background. There are also two additional members who take

<sup>2</sup> Note that SSIWPA’s Terms of Reference allow any “authorized representatives of the core agencies, i.e., the Islands Trust, the Capital Regional District and the North Salt Spring Waterworks District” to be elected chair. In practice, the chair has always been an Islands Trust Trustee. For a brief time, the CRD Electoral Area Director acted as co-chair.

part on a project basis (one community member and one Provincial Government staff person). Chairs are elected from the group’s membership and decisions are made by consensus.

As with SSIWPA generally, the role of the Technical Working Group has evolved over time. However, its stated purpose is “to provide scientific and technical support to the SSIWPA Steering Committee” (SSIWPA, 2018).

Among other roles, the Technical Working Group provides a means to assess volunteer or community science, and a place to refer matters of a technical nature that members of the Steering Committee may not have the expertise to comment on.

SSIWPA also established a three-member Conservation And Efficiency Working Group, which wrapped up its work in December 2019 after its terms of reference were completed (see Ungerson, 2019). Very recently, a nascent water purveyors working group was created with some support from SSIWPA to focus on matters of direct interest to improvement districts and CRD water commissions. At time of writing, this group has not been ratified as a formal SSIWPA body.

### 2.2.3 Budget

The Islands Trust Act, Islands Trust policy and Islands Trust Bylaw No. 154 authorize the Local Trust Committee to establish a special tax requisition.<sup>3</sup> Residents see this as a line item on their annual property tax bill. The funds from this can be used for purposes related to the bylaw.

This tax requisition accounts for the majority of SSIWPA’s annual budget, and in recent years the great majority. Other funds come from grants, contributions from other agencies (e.g., the Province or CRD) and unspent amounts from previous years. Figure 1 shows how the budget has changed over time, demonstrating that it has generally declined.

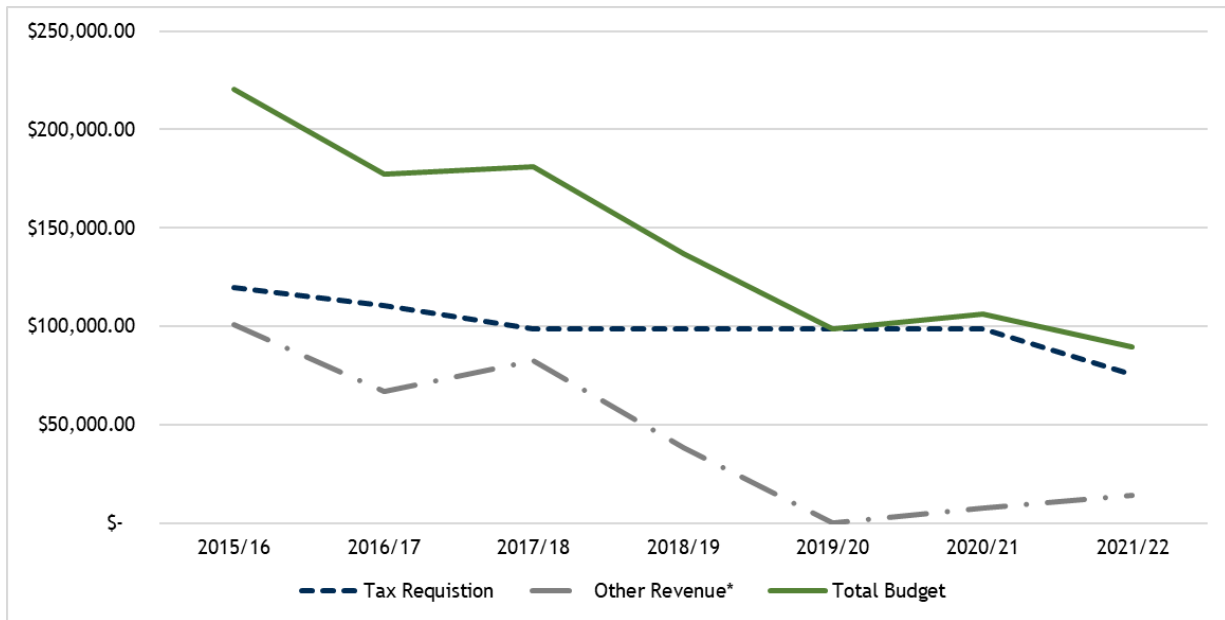
The 2021/22 tax requisition amount is \$75,500. Additional revenue is \$14,097 for a total budget of \$89,597 (SSIWPA, 2021b). In the 2021/22 budget, most funds (\$60,000 or 80%) go to the SSIWPA coordinator’s contract. The remainder funds outreach, events, and meeting logistics. We understand that budgets have been underspent over several recent cycles, leading to accumulation of a modest reserve.

The Steering Committee provides advice to the Salt Spring Island Local Trust Committee about budget needs and recommended spending. The Local Trust Committee in turn recommends a special property tax requisition amount to Islands Trust Council. All SSIWPA spending must be authorized by Islands Trust, and ultimate fiscal responsibility rests with Islands Trust Administrative Services department.

Note that this discussion does not account for the substantial in-kind and/or associated contributions to watershed protection from other agencies such as the Province, CRD, and North Salt Spring Waterworks District, much of which would almost certainly not have flowed without SSIWPA’s existence.

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<sup>3</sup> Under section 47 (2)(a)(ii) of the *Islands Trust Act*.



**Figure 1: SSIWPA Budgets (2015/16 to 2021/22)**

Sources: based on [SSIWPA \(n.d.\(b\)\)](#) for 2015/16 to 2019/20; [Islands Trust, \(2020b\)](#) for 2020/21; [SSIWPA, \(2021b\)](#) for 2021/22

#### 2.2.4 Contracted Coordinator Position

As noted above, the special tax requisition funds an ongoing contract to administer SSIWPA. The contractor’s tasks include: coordinating internal project-based communications; work planning; data-sharing; compiling and facilitating expert review of educational materials; organizing and facilitating meetings; managing the SSIWPA website; undertaking outreach work; record keeping; tracking expenditure; and, preparing annual reports among others. The same individual has acted as coordinator since SSIWPA’s inception.

More concretely, the coordinator assists with coordination and completion of various science projects. For example, the coordinator played a prominent role in gathering key data to assist Golder Associates, the contractor responsible for the 2019 aquifer mapping and monthly groundwater budget analysis, a project led by the Province (Gorski and Sacré, 2019). Similarly, the coordinator gathered data and undertook extensive analysis to complete the 2020 Water System Survey (Cowan, 2021b).

Other examples include outreach and education efforts (e.g., work to promote rainwater harvesting), public presentations, consultation on the St. Mary Lake Integrated Watershed Management Plan, and development of the Non-Potable Rainwater Harvesting Best Practices Guide (SSIWPA, 2020a). In 2019, the coordinator also led SSIWPA’s most recent strategic planning process, the results of which are discussed further below.

An important part of the job is updating and coordinating an annual SSIWPA workplan, which guides work through the year and tracks the status of various projects that participating agencies have agreed to undertake. The approved workplan for 2021/22 can be found in Table 3.

The coordinator position is filled through a “time and materials” contract with Islands Trust, where a Salt Spring Island planner is responsible for contract management and its Administrative Services Department is responsible for financial reporting. Initially the role was full time but now typically requires 20 to 25 hours per week.

This role is ongoing, has reasonably clear and standardized requirements year-to-year, and is operational in nature. As such, Islands Trust would have the option of filling this as an in-house, staffed position, as has been done in other jurisdictions we have worked with that have similar jobs. However, Islands Trust has continued to prefer the contracting-out route, largely for reasons of expedience and cost management.

It is also notable that the coordinator has very little interaction with Islands Trust staff in Victoria, which appears to take an “arm’s length” approach to SSIWPA’s work. For example, work on outreach related to rainwater harvesting over the past several years has been only modestly coordinated with the Trust Area Services department, which is responsible for communications and outreach for Islands Trust broadly. The implication is that opportunities for efficiencies and collaboration may be overlooked at present.

Finally, we point out that the work of the coordinator over the past eight years is highly regarded by virtually every one of the project informants we spoke with. There is also a strong consensus that having a paid coordinator in place is essential to maintaining momentum on watershed protection coordination given the many moving parts in play.

**Table 3: SSIWPA Workplan (1 April 2021 to 31 March 2022)**

SSIWPA Workplan April 1, 2021 - March 31, 2022									
	Area or Watershed	Lead Agency	Quarter:	1	2	3	4	Partner Agencies	Status
<b>Water Availability Analysis</b>									
Groundwater Availability	Cedar Lane	CRD						FLNR, Cedar Ln Commission	In process
Water Availability and Climate Change Assessment	Weston	CRD						FLNR, Fulford Commission	In process
<b>Monitoring</b>									
Groundwater Well Monitoring	Island	IT+FLNR							Ongoing
Lake Level Monitoring	Bullock	IT							Ongoing
	Cusheon	IT							Ongoing
	Weston	IT							Ongoing
	Stowell	IT							Ongoing
Water System Data Management Assistance		SSIWPA						In process	
<b>Policy and Planning</b>									
Bloom Notification Alert System	Cusheon, SML	Water Preservation						CRD, CLSC, Island Health	In process
Blackburn Legacy Landfill Pollution Assessment	Blackburn	Water Preservation						CRD, CLSC, ENV	In process
Watershed Protection Plan	Island	IT							In process
Proof of Sufficient Water (Time of Subdivision)	Island	IT						CRD, FLNR	In process
<b>Communications - Rainwater Best Practices</b>									
Rainwater Rebate Program	Island	Transition SS						CRD, SSIWPA	In process
Groundwater Brochure	Island	SSIWPA - TWG						FLNR	In process
Virtual Rain Tour, Online Water/Watershed Resources	Island	SSIWPA							Ongoing
Annual Report	Island	SSIWPA							Annually

Source: Provided by SSIWPA Coordinator

## 2.2.5 Distinct Brand

A final element that contributes to SSIWPA's character is that it operates under its own brand that is largely disconnected from the brand of its parent organization, Islands Trust.

In this discussion, it is important to understand that a brand is more than an organization's logo. A brand does include logos, but it also includes all the tangibles and intangibles that represent an organization. From the organization's perspective, a brand encompasses the positioning, messaging, communications, visual design, voice, promotions, and presence. From the audience's perspective, a brand is the organization's reputation, how the business makes them feel, what their experience is like with the organization, and what they think of it (Bourne, 2021).



Figure 2: SSIWPA Wordmark and Logo

In SSIWPA's case, brand independence from Islands Trust includes the fact that it has a unique logo (see Figure 2). However, it also includes that it has its own web domain ([ssiwpa.org](http://ssiwpa.org)) instead of a sub-page of Islands Trust (e.g., [islandstrust.bc.ca/ssiwpa](http://islandstrust.bc.ca/ssiwpa)). It is found in many small but important ways that the forum conducts business, for example in that meeting agendas, minutes, and other correspondence is branded with only SSIWPA visual elements.

See, for example, the exhibit in Figure 3, below. This is notable for the absence of Islands Trust's logo or other brand recognition of its role in sponsoring this work (or that of any other project sponsor), notwithstanding that the publication does certainly follow Islands Trust's corporate style guide in terms of fonts, colors, layout, etc. (see Islands Trust, 2021c).



Figure 3: Cover of Recent SSIWPA Education Outreach Publication  
Source: SSIWPA (2020a)

From project informants we understand that the decision to imbue SSIWPA with a brand identity that is separate and distinct from Islands Trust was a deliberate one made at its formation. We also understand that this was motivated by the desire to create a semblance of independence, even if from legal and administrative perspectives SSIWPA is in many important respects a creature of Islands Trust. The implications of this are discussed further in section 3.3, below.

## 2.3 SSIWPA History

Table 4 on the following page provides a timeline for watershed protection generally and SSIWPA specifically, focused primarily on the past decade. Although a young forum at only nine years' old, SSIWPA's history can be divided into four different phases:

1. **Before SSIWPA** - SSIWPA was preceded by another coordinating forum called the Salt Spring Island Water Council. This Council was established in 2002 and became a society under the *BC Society Act* before ceasing operations in 2017.
2. **Formation and Early Activity** - from formation in 2013 through to 2015/16, SSIWPA focused largely on water quality issues in the St. Mary Lake watershed, including completing the St. Mary Lake Integrated Watershed Management Plan (SSIWPA, 2015).
3. **Expanded Focus** - from about 2015 to 2019, SSIWPA's focus shifted to include other watersheds, starting with Cusheon Lake. Attention to water quantity issues also increased, and a conservation and efficiency working group was established. During this period, SSIWPA's name was also changed from "Authority" to "Alliance".
4. **Post 2018** - following the autumn 2018 local government elections, SSIWPA membership expanded further to include additional water commissions and members-at-large. Increased effort has gone into public education, particularly around conservation and rainwater harvesting, and a number of important water science projects were completed as noted in Table 4.

## 2.4 Highlights of SSIWPA Accomplishments

An inventory of all the accomplishments and activities related to watershed protection over the past decade, either by SSIWPA directly or its member agencies, is beyond the scope of this project. However, the list below highlights just some achievements to illustrate the type and breadth of work in which SSIWPA has played some role.

- completion of the St. Mary Lake Integrated Watershed Management Plan;
- local research and technical reviews of datasets on water availability, drought and climate change impacts, lake nutrient-loading and cyanobacterial bloom models, and groundwater recharge models;
- groundwater, lake level, and stream flow monitoring programs;
- aquifer analysis, groundwater budgets and recharge mapping;
- two surveys of small water systems' consumption, production, and operating needs;
- public education about water resources and conservation including an online reference library, water fairs, rain harvesting tours, displays at events, brochures, maps, open houses, interactive displays, workshops, and publications.

**Table 4: SSIWPA Timeline**

1974	<ul style="list-style-type: none"> <li>Islands Trust created</li> </ul>
1982	<ul style="list-style-type: none"> <li>Salt Spring Island Water Preservation Society established</li> </ul>
2002	<ul style="list-style-type: none"> <li>Salt Spring Island Water Council established; becomes a <i>Society Act</i> society in 2011</li> </ul>
2007	<ul style="list-style-type: none"> <li>Cusheon Watershed Management Plan released</li> </ul>
2009	<ul style="list-style-type: none"> <li>First St. Mary Lake Management Plan produced</li> </ul>
2012	<ul style="list-style-type: none"> <li>St. Mary Lake Working Group formed, later superseded by SSIWPA</li> <li>Options For Collaborative Watershed Management Of St. Mary Lake report prepared by Islands Trust (August)</li> </ul>
2013	<ul style="list-style-type: none"> <li>Islands Trust Council passes Bylaw No. 154, delegating powers related to preserving and protecting water resources to the Salt Spring Island Local Trust Committee</li> <li>SSIWPA is created (as the Salt Spring Island Water Protection “Authority”)</li> <li>SSIWPA Open House (2013-15)</li> </ul>
2014	<ul style="list-style-type: none"> <li>Salt Spring Island water resource document library established</li> </ul>
2015	<ul style="list-style-type: none"> <li>St. Mary Lake Integrated Watershed Management Plan completed</li> <li>Analysis of drought and implications for Salt Spring Island completed</li> <li>SSIWPA organized Salt Spring Island Water Fair (2015 and 2016)</li> <li>SSIWPA co-lead Rainwater Harvesting Tour (sole leadership in 2017 and 2018)</li> <li>Cusheon Lake Watershed Community meeting (September)</li> </ul>
2016	<ul style="list-style-type: none"> <li>SSIWPA membership expanded to include the Province (FLNRO and Agriculture) and Beddis Water Service Commission</li> <li>SSIWPA Conservation and Efficiency Working Group established</li> <li>Cusheon Lake Watershed Water Use survey completed (September)</li> </ul>
2017	<ul style="list-style-type: none"> <li>Salt Spring Island Water Council ceased operations</li> <li>Salt Spring Island municipal incorporation referendum defeated</li> <li>Groundwater Wells Inventory completed</li> <li>Provincial - SSI Non-Domestic Groundwater Licensing &amp; Agriculture Workshop (Jan)</li> <li>Islands Trust’s Senior Freshwater Specialist position created (permanent in 2020)</li> <li>Agricultural Water Demand Model completed</li> <li>SSI Rainwater Harvesting Survey completed by Royal Roads with SSIWPA support</li> </ul>
2018	<ul style="list-style-type: none"> <li>First Water System Survey completed (part of Golder project data collection)</li> <li>SSIWPA name change from “Authority” to “Alliance”</li> <li>New Terms of Reference adopted for Steering Committee</li> <li>Strategic planning meeting led by Mike Wei (June)</li> <li>Salt Spring Island Freshwater Sustainability Framework developed</li> <li>Groundwater well monitoring pilot project commenced</li> </ul>
2019	<ul style="list-style-type: none"> <li>New SSIWPA co-chairs appointed (later changed to single chairperson from LTC)</li> <li>Aquifer Mapping and Monthly Groundwater Budget Analysis for Aquifers report (the “Golder Report”) released by the Province; work supported by SSIWPA</li> <li>Priority-Setting Special Meeting and Report (April)</li> <li>Trust Council Reconciliation Declaration</li> </ul>
2020	<ul style="list-style-type: none"> <li>Non-Potable Rainwater Harvesting Best Practices Guide completed</li> <li>Rainwater harvesting virtual tour</li> <li>Salt Spring Island Water Service Optimization Study released</li> </ul>
2021	<ul style="list-style-type: none"> <li>Salt Spring Island Water System Survey completed</li> <li>Contributed to Rainwater Harvesting Rebate - a partnership by Transition Salt Spring and CRD</li> <li>Federation-wide Islands Trust Freshwater Sustainability Strategy completed</li> </ul>



## 2.5 Policy Context

Key Islands Trust documents frame the policy environment in which SSIWPA operates. The following list provides a brief overview of the most germane examples, some of which are referred to further below.

[The Islands Trust Policy Statement](#) - last updated in 2003, this document contains the principles and policies that guide the Islands Trust's work. Among these is a commitment that islands in the Trust Area should be self-sufficient in regard to their supply of freshwater. A pending update under the Islands 2050 Policy Statement Amendment Project may expand on this commitment with new policies (Islands Trust 2021c).

[2018 - 2022 Islands Trust Strategic Plan](#) - this plan includes the objective to “protect quality and quantity of freshwater resources of the Trust Area”, along with three supporting strategies.

[Islands Trust Reconciliation Action Plan 2019 - 2022](#) - this document provides a vision, principles, goals, actions, and timelines to guide Islands Trust commitment to reconciliation with First Nations, building on its 2019 Reconciliation Declaration.

[Islands Trust Freshwater Sustainability Strategy](#) - accepted by Trust Council in late 2021, this strategy identifies actions for the Islands Trust to take across the whole Islands Trust Area over the next decade to protect water resources, address supply constraints, and adapt to climate change.

## 2.6 Recent Strategic Planning

In recent years, SSIWPA members have participated in strategic planning, as follows:

- 2016-2018 - development of Integrated Freshwater Management multi-year workplan (see SSIWPA, 2018).
- June 2018 - Strategic Planning workshop (see Wei, 2018)
- 2018 - SSIWPA Strategic Planning Project (see Shulba, 2018a and 2018b)
- April 2019 - Priority Setting Special Meeting (see Cowan, 2019)

The most recent planning process, in April 2019, resulted in identification of three priority problems, listed below, along with 12 supporting actions.

- Priority Problem 1: Water availability and use (demand) is unknown for all watersheds and groundwater neighbourhoods.
- Priority Problem 2: There is a need for clear guidelines, promotions and incentives for rainwater harvesting systems.
- Priority Problem 3: Policies for proof of water lack clarity, harmonization, and specifications for alternative sources (Cowan, 2019).

A table summarizing the 12 supporting actions along with a status “report card” can be found in Appendix 3. This indicates that, on the whole, SSIWPA has been quite successful in achieving its goals when they are clearly articulated, particularly where implementation is more directly within the control of the SSIWPA coordinator (e.g., outreach activities).

### 3.0 Research Findings

This section provides a summary of research findings, supported with information from interviews, workshops, and the literature review. Text balloons provide illustrative quotes from interviewees or other project informants.

#### 3.1 SSIWPA Fulfills its Role as a “Big Tent”

There was widespread agreement that SSIWPA does serve its primary intended function of bringing together many of the involved government agencies and non-governmental organizations. It provides a forum that allows people with different backgrounds, opinions, and interests to gather. The mandate to serve as a “big tent” is threaded throughout the SSIWPA Terms of Reference, including a guiding principle that it will “include all stakeholders that wish to be involved.” (SSIWPA, 2021a, p. 2).

*A strategic focus benefits from having broader input.*  
Project interviewee

*What works well? Just having a regular, well-organized forum for discussion among involved parties.*

Project interviewee

Agency representatives spoke about how the broad membership of SSIWPA provides the opportunity to use it as a sounding board for policy proposals, for example as Islands Trust has done recently with policy for “proof of water” requirements for new subdivision applications. Members-at-large spoke about the benefits of having long-serving community representatives involved to provide corporate-memory and local history.

Note that positive sentiment around this point was not completely universal. Some participants wondered if there are not “too many cooks in the kitchen”, each with their own priorities and interests, resulting in conflicting pull on limited agency resources. Others thought that membership should be expanded even further to include virtually every organization with interest in watershed management such as Salt Spring Island Fire Rescue or the Island Streams and Salmon Enhancement Society.

#### 3.2 SSIWPA’s Unincorporated Status and Limited Authority

In legal terms, SSIWPA is an “unincorporated” forum, meaning that it is not mandated under legislation, regulation, or bylaw, nor is it a society, registered charity, business corporation, or any kind of legal entity. It operates at arm’s length from Islands Trust, its sponsoring organization. This, combined with the limited authority around watershed protection vested in the Salt Spring Island Local Trust Committee under Bylaw 154 (limited to “coordination”) significantly constrains what SSIWPA can accomplish, discussed further below.

*SSIWPA is not a thing in its own right. It only exists because of the work of member agencies.*

Project interviewee

In the simplest of terms, SSIWPA is a collection of people with shared interests. Islands Trust contracts a coordinator on its behalf. Indeed, the first guiding principle in the Terms of Reference “recognize[s] that SSIWPA itself does not carry authority but is rather a collective of agencies, each with independent responsibilities or authorities” (SSIWPA, 2021a).

This results in no small amount of consternation for some participants and confusion about purpose. Participants seem to variously desire the Steering Committee to be:

*This is a fundamental flaw with the model. It is an alliance rather than a managed group.*

Project interviewee

1. an operational committee that acts as a clearinghouse to coordinate the activities of members;
2. an agency and organizational roundtable that reviews policy and operational activities;
3. a stakeholder or community advisory board; and/or
4. a decision-making forum on watershed protection.

The Terms of Reference attempt to provide clarity on this, but elements of all four of these roles can be found therein. For example, among SSIWPA’s stated purposes is that it will “advise on policies of regional, local and provincial government organizations,” and “coordinate the implementation of those policies”. This implies that it is both a coordinating body (i.e., a place for agency staff to align policies and projects) and an advisory body (i.e., a place for community members to advise government on their views and desires).

### 3.3 SSIWPA’s Autonomous Brand Identity

As discussed above, when SSIWPA was first established, a decision was made to vest it with its own brand identity (e.g., logo, website domain, etc.) almost completely autonomous of Islands Trust.<sup>4</sup> SSIWPA is positioned to members and the public as an autonomous entity despite its financial and administrative dependence on Islands Trust.

The continuation of this brand autonomy almost certainly contributes to heightened expectations of what SSIWPA can deliver on its own given its unincorporated status and lack of independent decision-making authority. The current branding approach also makes it very difficult for residents to connect SSIWPA’s activities (e.g., the recent rainwater harvesting outreach) to the taxes they pay to Islands Trust. We also understand that residents sometimes confuse SSIWPA with other organizations, particularly the closely named Salt Spring Island Water Preservation Society.

### 3.4 Capacity and Mandate Versus Member Expectations

The most common complaint we heard about SSIWPA concerns its limited jurisdictional authority flowing from its unincorporated status and the constraints imposed under Bylaw 154. Typically, this was articulated as frustration that SSIWPA cannot, as many interviewees and others put it, “do things” (see, for example, Driftwood Staff, 2019). We understand this to mean that it typically does not commission studies and projects, particularly technical and scientific ones, independent of its participating agencies.

SSIWPA presents as an autonomous alliance with watershed protection built into its name, heightening the expectations of participants, particularly non-government members. Unfortunately, it cannot possibly meet these expectations based on the limitations imposed by its administrative status, supporting bylaw, and budget capacity.

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<sup>4</sup> Many interviewees brought to our attention the fact that SSIWPA was originally called an “Authority”, later changed to the current “Alliance”. They did so to point out that this historical misnomer suggested that, as a body, SSIWPA has more authority than it actually does.

The Terms of Reference attempt to clarify this by focusing on a “coordination” mandate, but understandably this does not stop members from attempting to use SSIWPA as a forum to advocate for delivery of projects that they believe will improve watershed sustainability. In the past, this has also resulted in extensive discussion about what “coordination” means.

*There have been too many maddening discussions about what does and does not constitute coordination.*  
Project interviewee

*Right now, we go around cap in hand for every project.*  
Project interviewee

When members identify a project that they believe needs doing, they must “shop it around” to find a sponsor agency, typically the Province, CRD, or Islands Trust. When a sponsor cannot be found, disappointment results.

A recent example was brought to our attention by several different interviewees. In this case, a number of SSIWPA Steering Committee and Technical Working Group members invested considerable effort in scoping out a statement of work for a technical groundwater project that would benefit one of the CRD water service areas. However, when CRD was approached to take the project on, it was unable to do so due to capacity constraints and because it was not part of already confirmed workplans. As one member put it, “should SSIWPA have even got involved with designing this when we don’t know if there a pathway to completion?... It’s frustrating.”

Compounding things, if “coordination” is interpreted narrowly to mean hosting meetings and some additional work to assist agencies with projects of mutual interest, for example the work done to support the 2019 aquifer mapping and groundwater budget study (Gorski and Sacre, 2019), SSIWPA is arguably over-resourced. Similar kinds of coordination are achieved in other jurisdictions by simply establishing committees and assigning coordination tasks to line agency staff as a small part of their job description.

That SSIWPA is resourced to do more than coordinate is reflected in the fact that it has built up reserves in recent years (albeit relatively modest ones) and that the coordinator does extensive work in the area of outreach and education that arguably goes beyond coordinating such tasks on behalf of members.

In sum, SSIWPA is between something of a rock and a hard place. On the one side, it is not resourced or mandated to deliver the technical and scientific projects that members desire of it. On the other side, it is arguably over-resourced to simply coordinate operational activity and advise on policy development, something that could be accomplished at lower cost and with less ceremony.

### 3.5 Procedural and Governance Issues

Two procedural matters came to our attention through interviews and research. First, the SSIWPA Terms of Reference stipulate a decision-making framework wherein decisions are to be made by consensus. Confusingly, however, when consensus cannot be reached a voting procedure can be used, but members-at-large and ex-officio members (i.e., Provincial

*If all the money goes into education and things like that, what decisions need to be made?*  
Project interviewee

government staff) are not eligible to vote. Several members of these groups expressed feeling disenfranchised by this during interviews, but this appears to be a largely incidental given that the body has no real decision-making power and since most decisions are made by consensus in any case.

Second, a number of interviewees questioned the appropriateness or need for SSIWPA to be chaired by an elected official. The Terms of Reference stipulate that the Chair must be elected by the membership from “authorized representatives of the core agencies, i.e., the Islands Trust, the Capital Regional District and the North Salt Spring Waterworks District” (SSIWPA, 2021a, p. 5). In practice, however, it has always been chaired by an Islands Trust elected Trustee (barring a short period when it was co-chaired by an elected CRD Director). Several interviewees questioned whether this is either necessary or appropriate.

In our experience, elected officials chairing a body such as this is unusual. Governance best practices typically dictate that the role of elected officials is to enact bylaws and provide strategic policy direction and guidance to appointed officials (i.e., staff), rather than to become directly involved in the kinds of operational and administrative activities that SSIWPA is concerned with (see, for example, Stewart, 2012).

Further, the approach is inconsistent with comparable forums sponsored by Islands Trust. For example, neither the Salt Spring Island Agricultural Advisory Planning Commission nor the Salt Spring Islands Trust Advisory Planning Commission are chaired by Trustees. In both cases, the chair is elected from the committee membership and is typically a community member (see Islands Trust, 2013b). If SSIWPA’s role is mainly advisory and/or operational, then this is likely a preferable approach.

*The chair should not be from either the Island’s Trust or from the CRD but elected from the other steering committee members.*  
Project informant

### 3.6 Facilitating Volunteer Science

Since its outset, SSIWPA has had challenges with facilitating the inclusion of volunteer/community science produced by its members in agency decision making. A founding idea with establishing this forum in 2013 was that it would be a means to take advantage of the expertise of local volunteers, particularly retired professionals with subject matter expertise in water-related sciences. This would serve to reduce costs and leverage local knowledge. Unfortunately, agency staff have consistently struggled to use the recommendations and in some cases scientific data and analyses that has been produced because of perceived issues with the technical qualifications and the work quality, resulting in what one informant called a “divisive environment”.

This was an acute challenge in the mid-2010s around water quality science work involving St. Mary Lake. However, it continues today in a more muted form. Volunteers believe their work has value and technical merit. Agency staff are not always sure how to deal with the results, noting that their statutory decisions are subject to public and proponent scrutiny and possibly review by oversight bodies such as the Environmental Appeal Board, dictating high standards.

Greater clarity in the form of a policy and/or operational guidelines about how volunteer science will be used on Salt Spring Island for watershed protection and what role volunteers can play is recommended. This may serve to avert future frustration for participants.

### **3.7 Engagement with First Nations**

Thirteen First Nations have treaty and territorial interests in Salt Spring Island and its surrounding waters. Islands Trust has made strong commitments to reconciliation with Indigenous people under its 2019 Reconciliation Declaration and the 2019-22 Reconciliation Action Plan (Islands Trust, 2019a). The SSIWPA Terms of Reference include provision for three Steering Committee seats for First Nations representatives (Islands Trust, 2021a). However, to date those seats have not been filled.

Attempts to engage First Nations and Indigenous organizations to become involved in SSIWPA or its activities have also been scarce. The coordinator did attempt to involve five Nations in St. Mary Lake planning in 2014 and 2015 through mail outs and phone calls and attempted to contact seven different Nations again via phone in April/May 2017 about island-wide planning. Annual reports were shared via a limited email distribution list in 2017 through 2019 (Cowan, 2021a). However, in general, effort has been limited, directed by the steering committee and effected by the coordinator, and has offered an unclear value proposition to potential First Nations participants.

Indeed, it is not immediately clear why First Nations would want to take part in SSIWPA. The forum has no decision-making authority, Nations have many competing priorities and resource constraints of their own, and typically oversee territories much larger than Salt Spring Island. We suspect they would prefer to engage directly with agencies on a government-to-government basis at a separate table rather than sitting at a multi-stakeholder forum. Based on experience elsewhere, we suspect that Nations may also require capacity funding to take part and would likely need to clearly understand the benefits of participating. However, to confirm this, they would need to be asked.

Clearly, SSIWPA on its own is not equipped for this task given its resource constraints and unincorporated status. As an alternative, it has been suggested that engagement should be coordinated through Islands Trust or another government agency. However, this once again begs the question of why SSIWPA has been positioned as an autonomous entity.

In any case, if SSIWPA's main task is coordination among agencies and organizations with interest in watershed protection on Salt Spring Island, the continued absence of First Nations and Indigenous organizations in its activities stands out as a deficiency.

### **3.8 Desire for Local Control**

A recurrent theme from interviews was a desire that decisions and coordination activities to be delivered directly from Salt Spring Island. This is driven by wanting to maintain control

locally, but also for reasons of cost effectiveness. Many we spoke to believe that delivery of SSIWPA’s activities out of Victoria (as could be the case under a CRD lead) or Nanaimo (as could be the case under a Provincial Government lead) would result in higher costs and decisions that are not fully informed by local interests.

This issue is colored by recent discussions about CRD’s role in water system management and debate about the future of North Salt Spring Waterworks District resulting from the 2020 Salt Spring Island Water Service Optimization Study (Innova Strategy Group, 2020). In

part because of this, as discussed further below, some SSIWPA members support a greater role for CRD in watershed protection, along the lines of services delivered in Regional District of Nanaimo and Cowichan Valley Regional District. Other members are decidedly against this for a variety of reasons. However, there is a general (though not universal) consensus that, even under an imagined CRD or Provincial Government lead, coordination should be delivered out of Salt Spring Island.

*My vision is that services should be delivered out of Salt Spring Islands as much as possible.*  
Project interviewee

### 3.9 Long Range Planning

There was general agreement among interviewees that SSIWPA is hampered by the absence of a long-term, multi-agency strategic plan for watershed stewardship on Salt Spring Island. They pointed to the need to follow through in planning efforts in recent years (i.e., Wei, 2018; Shulba, 2018b, Cowan, 2019). A number of people mentioned the tension between those who would like to see effort directed to addressing water quantity constraints and meet needs of water service providers versus those who are primarily interested in water quality or watershed protection more broadly. Strategic planning is one avenue to reconcile this. Several people mentioned Regional District of Nanaimo’s 10-year Drinking Water and Watershed Protection Plan (RDN, 2020) as a possible model. Strategic planning is also seen as

*The SSIWPA table does not have a long-range plan, so there are constant efforts to change the annual workplan.*  
Project interviewee

a means to account for and clarify the role of non-governmental organizations (e.g., Transition Salt Spring and the Water Preservation Society) in SSIWPA. It can also assist with bolstering the case for SSIWPA or its members to be eligible for future grants and other resources from senior governments and funders.<sup>5</sup>

### 3.10 Despite the Challenges, Participants Value SSIWPA

Despite the many challenges, participants still value SSIWPA and the unique role it plays in watershed protection. In particular, they mention the important role of the coordinator for maintaining momentum and workplan tracking. People pointed to specific examples to illustrate. One example was coordination of data collection for the 2019 groundwater study (Gorski and Sacre, 2019). Another is the ongoing groundwater monitoring project, which, as one interviewee put it, is “happening because SSIWPA is there. We now have a really great dataset”.

*[SSIWPA] is an anchor point for so many things that are being left adrift.*  
Project interviewee

<sup>5</sup> Note that Econics has been provisionally commissioned to assist Islands Trust and SSIWPA to prepare such a strategic plan in the next phase of this project.

There is general consensus that, if SSIWPA did not exist, some other forum would need to be created to coordinate the diverse interests and players.

*I give SSIWPA top marks. The chair does a great job running meetings and the coordinator is fantastic. [But], it does a great job within the limits of what SSIWPA can actually do.*

Project interviewee

This praise was always tempered, however, with frustration about SSIWPA's many challenges, particularly its perceived inability to "do things" as highlighted in section 3.4 above.

### 3.11 Broader Governance Quandaries

SSIWPA participants recognize that problems with watershed and aquifer protection on Salt Spring are intractably wrapped up in larger governance issues facing the island.

At the end of each interview, each participant was asked, hypothetically, how they would structure watershed stewardship coordination on Salt Spring Island if they could remake the world any way they wanted. Virtually everyone indicated that they would start with deep changes to the governance structure. For some, this means municipal incorporation. For others, it means a greater role for the CRD. Still others envision a new model involving changes to the *Local Government Act*.

*Blaming SSIWPA for the impotence is a mistake. It's our governance structure.*

Project interviewee

For some, this means municipal incorporation. For others, it means a greater role for the CRD. Still others envision a new model involving changes to the *Local Government Act*.

Governance reform is seen to offer a range of potential benefits, chief among them reducing administrative fragmentation, and clarifying responsibility for watershed protection. The implications of this are examined further in Section 4.7, below.

### 3.12 Synthesis

Synthesizing the findings above, agencies and stakeholders working on watershed protection on Salt Spring Island want the following:

- incremental progress towards improved watershed and aquifer protection;
- a harmonized, multi-agency strategic plan to guide watershed protection efforts;
- ability for the coordinating agency or body to substantively enhance watershed and aquifer science, efficiency, water service provision, land use planning, etc.;
- a regular, structured, and formal meeting forum where government agencies and community organizations come together to share information, coordinate, and seek efficiencies in program delivery;
- improved coordination and engagement with First Nations with treaty and territorial interests in the island and surrounding waters and with Indigenous organizations;
- ability to coordinate information collection, management, storage, and access;
- ability to harness and coordinate enthusiasm from volunteer community members to contribute to watershed and aquifer science and/or stewardship;
- local control, with coordination functions delivered from Salt Spring Island;
- reduced administrative and governance fragmentation; and,
- administrative and cost efficiency.



These goals can be summarized in the following ten-point table, which could also serve as an evaluation criteria to help assess different watershed protection governance models.

#	Criterion	Description
1	Ability to host “big tent”	Ability to continue to act as a forum where government agencies and community organizations can come together to share information, coordinate, and seek efficiencies in program delivery
2	Ability to “do things”	Ability for the forum (or the agency it is nested in) to undertake activities to enhance watershed and aquifer science, water use efficiency, water service provision, land use planning, etc.
3	Ability to plan	Ability to develop and coordinate implementation of a harmonized, multi-agency strategic plan for Salt Spring Island
4	Capacity to coordinate with First Nations	Capacity to engage and coordinate with First Nations with treaty and territorial interests or areas on Salt Spring Island and/or with Indigenous organizations
5	Ability to manage data & information	Ability to coordinate data and information collection, management, storage, and open access
6	Facilitate volunteer science	Ability to harness enthusiasm from volunteer community members to contribute to watershed and aquifer science and/or stewardship and facilitate use in agency decision-making
7	Local control	The coordination function is delivered from Salt Spring Island and key decisions are made locally
8	Reduced fragmentation	The coordination function serves to reduce rather than increase administrative and governance fragmentation of water resource stewardship on Salt Spring Island or across the Islands Trust Area.
9	Cost efficiency	Residents receive value for money from expenditure on watershed protection coordination
10	Ease of implementation	The new governance and administrative arrangements can be put in place quickly, easily and/or cost effectively

SSIWPA members and support staff were canvassed on their preferences on these criteria at their 28 January 2022 regular meeting. They were asked to choose which criterion ranked first, second, third and least important to them through an online polling exercise. No clear consensus emerged from this exercise, with the exception of the following points:

- Ability to “do things” (criterion #2) was most highly ranked by a wide margin. This is consistent with the discussion in s. 3.4, above, and reaffirms that what members desire most from their coordinating body is that it also has substantive ability to deliver projects and policies related to enhancing watershed and aquifer science, water use efficiency, water service provision, land use planning and so forth.
- Ability to plan (criteria #3), local control (criteria #7), and ability to host a forum where agencies and organizations can come together (criteria #1) also ranked highly, again consistent with the analysis provided above.
- Implementation issues, such as cost efficiency (criteria #9) and ease of implementation of a new governance model (criteria #10) were generally less valued, perhaps indicating that results on enhanced watershed protection are people’s highest priority.

In sum, review of the evaluation criteria by SSIWPA members generally served to validate the findings set out in this section. With this in mind, the next section identifies a range of alternative governance and administrative options for watershed protection coordination.

## 4.0 Options for Watershed Protection Governance and Coordination

This section lists and describes options for watershed protection coordination governance arrangements for the future. These are itemized roughly in order of how difficult they would be to implement based on current legislative, regulatory, and bylaw authorities (and therefore presumably how long they might take realize).

Note that ability to provide at least the following results to a lesser or greater degree is considered a minimum requirement for inclusion in this analysis:

- ability to provide a forum for agencies and organizations to come together to share information, coordinate, and seek efficiencies in program delivery (i.e., can host the “big tent”); and,
- ability to coordinate harmonized, multi-agency strategic planning.

Table 5 summarizes the options.

**Table 5: Options for Watershed Protection Coordination**

- |  |
|--|
| <ol style="list-style-type: none"><li>1. status quo (or modified status quo)</li><li>2. internalize coordination function within Islands Trust</li><li>3. transfer coordination function to CRD under a new or existing service under the <i>Local Government Act</i></li><li>4. incorporate SSIWPA as an independent not-for-profit organization</li><li>5. create a ministerial advisory board under the <i>Water Sustainability Act</i></li><li>6. transfer the coordination function to the Provincial Government under a water sustainability plan or area-based regulation under the <i>Water Sustainability Act</i></li><li>7. transfer the function to a not-yet-existent local water services and/or watershed protection authority</li></ol> |
|--|

The following discussion describes each option and provides qualitative considerations for how well each one generally fares against the evaluation criteria set out in section 3.12.

### 4.1 Status Quo (or Modified Status Quo)

This option would continue the status quo. Islands Trust would continue to fund SSIWPA and the coordinator function via a special tax requisition under Bylaw 154. The independent SSIWPA brand would be maintained, as would the current committee structure and membership, perhaps with modest changes to improve delivery. The coordinator role would continue, presumably delivered by contract on a part-time basis.

#### Considerations:

- This option is the easiest to implement; no major administrative changes or governance reforms are required.
- Many of the factors that participants value most highly can be maintained. SSIWPA can continue to bring stakeholders and agencies together, the coordination function would continue to be delivered from Salt Spring Island, and the capacity to develop a long-term strategic plan for watershed protection is available.

- Sources of frustration would remain, notably the limited capacity to deliver desired policies and projects due to lack of authority.
- Preliminary analysis indicates that this option is among the most cost-efficient on a per unit basis (i.e., in terms of fully on-costed hourly staff rates).
- On its own, SSIWPA will likely remain hard pressed to engage First Nations due to capacity constraints and because it offers an unclear value proposition to Nations.
- Minor changes could be made to improve efficiency and effectiveness. For example, this might mean improved coordination with other Islands Trust functions, such as with Trust Area Services on matters involving communication and outreach.

## 4.2 Internalize Coordination Function within Islands Trust

Under this option, the SSIWPA brand would be retired, and the function would be treated as an operational one under Islands Trust, perhaps in the form of a freshwater advisory planning commission. Delivery would be more integrated with other Islands Trust activities (e.g., Trust Services' outreach efforts, freshwater science, intergovernmental relations).

The coordinator position could continue under one of two possible approaches, both of which would see greater oversight by senior staff:

1. The position could be in-housed to Islands Trust. Under this scenario, a new position would need to be created on the expectation that it would provide support not only to SSIWPA's successor forum, but federation-wide to support implementation of the Islands Trust Freshwater Sustainability Strategy. This would require Trust Council budget approval as well as BC Public Service Agency approval regarding job duties, etc.; or
2. The position could continue to be contracted out and paid for through the special property tax requisition for the Salt Spring Island Local Trust Area. Under this scenario, the contractor could provide support only to the Salt Spring Island Local Trust Committee and SSIWPA's successor forum.

### Considerations:

- This option is relatively easy to implement. No major legislative changes are required. Coordination activities can continue to be delivered under the authority of Bylaw 154.
- Islands Trust is relatively well positioned and committed to better engagement with First Nations under its Reconciliation Action Plan, noting its capacity and staffing constraints.
- Costs would likely be comparable to the status quo; however, this option would provide Islands Trust with more flexibility to manage the budget currently allocated to SSIWPA in coordination with budgets for groundwater science projects and/or the corporate Freshwater Sustainability Strategy.
- This approach could create opportunities to realize efficiencies by utilizing skills and resources of other Islands Trust staff and departments.
- Islands Trust has capacity to undertake activities related to watershed science, education and outreach, planning, etc., but only within limits of the *Islands Trust Act*.

### 4.3 Transfer Coordination Function to CRD

Under this option, CRD would take over watershed protection coordination and deliver this under [Bylaw 2454](#) and [Bylaw 4178](#) (its Salt Spring Island stormwater management bylaws, noting that Bylaw 4178 includes authority to provide “watershed assessment, protection and enhancement” services). CRD would staff a part-time coordinator position, either internally or via contract at its discretion. This would be delivered out of Victoria or Ganges, again at CRD’s discretion, but from Salt Spring Island would be recommended. Service provision would be modelled on current programs CRD coordinates on behalf of local governments and community organizations (e.g., Victoria Harbour Action Plan, Bowker Creek Initiative). A new coordinating committee would be established modelled on, for example, CRD’s existing Water Advisory Committee (CRD, 2014) or the Regional District of Nanaimo’s multi-stakeholder Drinking Water and Watershed Protection Technical Working Group (RDN, 2020).

In the future, a new “watershed protection service” could also be established, like the ones in place in Regional District of Nanaimo and Cowichan Valley Regional District, under which more ambitious activity could take place. However, it is our understanding that this would not be immediately required given the existing authorities under Bylaw 4178 (i.e., the coordination activities currently carried out by SSIWPA could be undertaken by CRD under its already existing authorities). As such, this option could be implemented in short order.

#### Considerations:

- This option is relatively easy to establish. Services can be delivered under an already existing service bylaw. No referendum is required, and no immediate bylaw change would be necessary.
- CRD is less limited in what it can do related to watershed protection activities compared to Islands Trust (due to limitations of Bylaw 154 and the *Islands Trust Act* versus the *Local Government Act*).
- Services could be expanded later if required by establishing a watershed protection service (noting that this may require a referendum).
- CRD is relatively well positioned to engage with First Nations through its First Nations Relations Division, noting that it too likely has capacity constraints.
- Local delivery can be maintained through the CRD Salt Spring Island office, although this is not assured as CRD may elect to deliver watershed protection coordination from Victoria.
- CRD could realize efficiencies by utilizing skills and resources of existing CRD staff and departments.
- This approach could lead to modest reduction of administrative fragmentation because watershed protection can be coordinated internally with water service provision for the services CRD manages.
- This option is likely somewhat more expensive on a per unit basis compared to Option 1 or 2 because, as we understand it, CRD has relatively higher hourly charge out rates.
- The tax requisition limit under CRD Bylaw 4178 is less than the current limit under Islands Trust Bylaw 154. As a result, less funds may be available. Alternatively, the CRD limit may require an increase, an implementation issue that will need to be addressed if this option is seen as viable.

#### 4.4 Incorporate SSIWPA as a Not-for-Profit Organization

Under this approach, SSIWPA would become an independent, incorporated entity, likely a society under the *British Columbia Societies Act*. This would be similar to the approach taken by the former Salt Spring Island Water Council in the mid-2010s. It would operate under the governance of a board of directors and would have no formal reporting responsibility to any one government agency, barring around any funding arrangements. Elected officials would likely not be able to participate on such a board because of conflict of interest. It could retain the current SSIWPA brand (logo, etc.). The coordinator role would be staffed as either a society employee or contractor, likely in some form of “executive director” capacity. Funding would need to come primarily from member government agencies. However, Islands Trust could not fund this approach under Bylaw 154 given its very limited authority to provide grants.<sup>6</sup> In any case, a non-profit organization would also be free to pursue other funding opportunities such as grants or membership fees.

##### Considerations:

- A not-for-profit would have relatively unhindered ability to conduct science and outreach-related activities but would have no regulatory authority under the *Local Government Act* or other statutes.
- This model could enable pursuit of innovative funding models and project delivery.
- Local delivery of the coordination function would almost certainly be maintained.
- Staffing costs would be comparable on a per unit basis to the status quo, but efficiencies from coordinating with other governmental departments would be much less readily available.
- It would take considerable effort to establish and create governance structures (e.g., determine board of director arrangements; attain society status).
- This approach does not reduce administrative and governance fragmentation and may exacerbate this by creating another management entity.
- A society could have broad membership, including government agencies, but has no positional authority to attract and retain members over the long term.
- A society could not approach First Nations on a government-to-government basis about watershed protection coordination; however, First Nations may be interested in participating in such a forum if a value proposition can be clearly demonstrated.
- A society would be well positioned to coordinate volunteer science but would still depend on the willingness of member government agencies to utilize the results.
- This model will always be dependent on outside sources for funding.

#### 4.5 Create Ministerial Advisory Board under the *Water Sustainability Act*

Section 115 of the *Water Sustainability Act* enables the responsible Provincial minister to create an advisory board to provide advice in relation to various matters under the Act. The chair would be appointed by the minister, and there is provision for paid remuneration for some or all members. This provision has never been used, so this would set a precedent.

Creating such a board would still require one or more of the member government agencies to fund it. Conceivably, this forum could be established under Provincial legislation, but still be

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<sup>6</sup> See <https://islandstrust.bc.ca/document/policy-2-1-14-hist-heritage-and-conservation-grants/>

hosted by another agency (i.e., CRD or Islands Trust) or it could be independent. As such, this option could be simply a variation of options 1 through 4 above. However, establishing it as a ministerial board could bestow additional status and authority.

#### Considerations:

- This model and legislative provision are untried. As a result, it would take some time and effort to establish and would depend on Provincial Government willingness.
- Some agency would still need to fund and host this forum. At time of writing, there is no readily available source of Provincial funding, implying that either CRD or Islands Trust may still need to contribute funding and/or support services to make this viable.
- An ongoing and high-profile forum may increase visibility of Salt Spring Island's water sustainability challenges and potentially Provincial Government resourcing.
- This option would likely be administered out of the Nanaimo regional office where the Province's Vancouver Island Region staff are headquartered.
- Much like the status quo, this body would have no regulatory or legislative authority on its own (it would be purely advisory to the Minister). As a result, it would continue to depend on individual agencies to deliver desired policies and projects.
- The relatively higher profile of this approach may attract First Nations' interest, especially if a standalone First Nations caucus or table were to be established.

The remaining two options are both within the realm of possibility. However, they have challenges, in that they require some combination of new regulations, legislation, bylaw or electoral referendum. This is not to dismiss or downplay them, but simply to clarify that they would take time to implement, and so may require an interim solution from the first five options (including the status quo option) while they are pursued.

#### 4.6 Transfer the Coordination Function to the Provincial Government

Under this option, the responsibility for coordination would transfer to the Provincial Government, which would play out this role under a water sustainability plan or area-based regulation under the Part 3, Division 4, or Section 124 respectively of *Water Sustainability Act*. These legislative options have yet to be exercised in BC, so it is not immediately clear how this would be done, but it is almost certain that the Province would have to create new regulations, approved by Cabinet.<sup>7</sup> Under this framework, the Province might implement additional requirements, such as requiring licenses for domestic well owners, or requiring domestic users to meter and report water use. As the department responsible for water management does not currently have offices on Salt Spring Island, this function would likely be delivered out of the regional office in Nanaimo.

Note that the Province could, in theory, take on coordination responsibility without developing a water sustainability plan or new regulations, but recent historical experience suggests this is unlikely to happen.

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<sup>7</sup> Note that that work on water sustainability plans is now underway for the Koksilah River on Vancouver Island and with the Township of Langley in the Lower Mainland.

## Considerations:

- The Province has broad authority around water management including licensing use and other abilities to regulate under the *Water Sustainability Act*.
- The Province has significant experience with First Nations engagement and a fiduciary obligation to consult on key decisions.
- The Province is well equipped to coordinate information management.
- A program of this kind would likely be administered out of Nanaimo, where water management staff are headquartered.
- Large cost overheads would be incurred to create and support a water sustainability plan and associated regulations.
- The Province would likely not entertain this option without first seeing significant engagement with First Nations by local governments.
- The Province is not directly involved with local land use decision making (zoning, building approvals, etc.) or water service provision, so continued coordination with local governments and improvement districts would be required.
- The Province is not particularly well positioned to harness volunteer science.

## 4.7 Transfer Coordination Function to New Local Authority

Under this option, responsibility for coordination would transfer to a not-yet-existent local water services and watershed protection authority.

Various options for creating such an authority have been identified, including:

- a Salt Spring Island municipal government (see, for example, Urban Systems (2013);
- a Local Community Commission (LCC) under the CRD (see, for example, SSICAGWG, 2018; Holman, 2022);<sup>8</sup>
- an independent, island-wide water services and watershed utility not associated with a municipal government created under proposed amendments to the *Local Government Act* (sometimes referred to as a “Greater Board”); or,
- a watershed protection authority established under Provincial legislation with taxation authority, but no direct role in drinking water provision (somewhat akin to the Okanagan Basin Water Board).

There are important differences between these options with respect to issues such as retention of local control and cost to ratepayers. They all have different implications for governance. As well, some options are more immediately viable than others. For example, a Local Community Commission is already enabled under the *Local Government Act* (Division 9), whereas a “Greater Board” would possibly require amending the Act, and an island-wide municipal government is probably unlikely soon given the failed 2017 referendum.

However, from the point of view of coordinating watershed protection, there are important commonalities, at least in the short term. For example, implementing any of these variations

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<sup>8</sup> Note that the option of CRD taking over responsibility for water service provision from improvement districts island-wide is also discussed (see, for example, Innova Strategy Group, 2020). However, if an expanded CRD drinking water utility were to also take on responsibility for watershed protection coordination without other governance changes (e.g., establishing an LCC), this approach would be more consistent with Option #3, above.

would require approval from the electorate (and in some cases legislative change), so would take time. As such, for reasons of simplicity, all these options are treated as one for the purposes of this analysis.

**Considerations:**

- A new or enhanced local authority could have wide-ranging powers related to watershed protection under the *Local Government Act* or other statutes.
- This option would likely entail the highest level of local control.
- This option could serve to reduce administrative and governance fragmentation (for example, by reducing the number of agencies and/or commissions involved in water service provision).
- The capacity to engage with First Nations, harness community/volunteer science, and the cost implications are all not immediately clear.
- This option would be the most difficult one to establish.

With these alternatives in mind, the next section turns to summarizing and providing recommendations.



## 5.0 Summary and Recommendations

Summarizing the findings and analysis above, there are a number of known and widely agreed-upon challenges with the way SSIWPA currently works. These challenges are certainly systemic, meaning that they are a result of the governance structure itself rather than the people involved. Many participants want reform and are able to identify what they desire from a new governance arrangement. There are also readily identifiable alternative governance approaches. These involve varying levels of difficulty to implement and would have varying effectiveness in achieving the evaluation criteria set out in section 3.12, above.

The table is therefore set to select a preferred long term governance option for watershed protection coordination. However, this report stops short of doing so for two reasons. First, conversations with SSIWPA participants over the course of this project indicate that, while there is widespread appetite for governance reform, preferences for what this should look like vary dramatically.

For example, some SSIWPA participants enthusiastically endorse transitioning responsibility for coordination to CRD under its existing stormwater service (option 3, above). On paper, this option has a number of strong attributes. It would be relatively simple to implement, CRD is less hindered in ability to deliver watershed protection services compared to Islands Trust, CRD already delivers similar programs elsewhere, and necessary administrative architecture is in place. However, it is equally apparent from discussions with SSIWPA participants that others would strongly oppose this approach in the absence of further consensus building and governance reform. Motives vary but include fear of loss of local control, cost concerns, and historical reasons mainly rooted in past experience with issues related to water service provision.

Second, there are broader governance reform discussions underway on Salt Spring Island that need time to unfold and caution against piecemeal restructuring narrowly focused on watershed protection is warranted. Notably, some SSIWPA members would prefer to postpone modest change in favour of pursuing more comprehensive governance change (i.e., of the kind described in options 6 or 7 above). For example, North Salt Spring Waterworks District indicates in its draft 2021-2024 Strategic Plan a priority objective to seek “a governance structure that enables coordinated and efficient water service delivery and resource management including the potential for an island-wide governance water authority” (see NSSWD, 2021; Sjuberg, 2022). In parallel, CRD is scheduling public consultation for spring 2022 on establishing a Local Community Commission (Holman, 2022). Details on this are not yet available, but we assume this would be based on a model similar to the one set out by the Salt Spring Community Alliance Governance Working Group in its 2018 report (see SSCAGWG, 2018). A citizen referendum on this alternative could be held as early as October 2022.

In sum, there is lack of consensus among participants, and we are unable to resolve this within the scope of this phase of the project. There are also broader discussions underway about water service provision and governance for the island generally that could have significant repercussions for watershed protection. It is therefore the considered view of the authors that recommending any one approach from the list of options set out above as a long-term solution is unlikely to result in any kind of immediate common agreement among participants. As a result, focused, structured effort on consensus building on long term governance reform is needed first.

Meanwhile, we recommend the interim approach set out below as a path to address some of the most immediate issues identified in section 3, above. Principally, this includes managing participant expectations, improving engagement with First Nations, addressing procedural concerns, and SSIWPA's lack of authority in its own right. The recommended interim solution, based on Option 2 as described in section 4.2, is as follows:

**Recommendation 1:** internalize watershed protection coordination as an operational function within Islands Trust, including:

- integrate activities currently done under SSIWPA with Islands Trust's work on Freshwater Sustainability Strategy implementation and related existing functions;
- discontinue use of the independent "Salt Spring Island Watershed Protection Alliance" brand identity, including the logo, Internet domain, and title, in favour of applying Islands Trust's corporate brand to all internal and external communications going forward;
- continue the SSIWPA steering committee with revised terms of reference as an Islands Trust advisory committee and with a chair elected from its membership;
- continue to deliver watershed protection coordination services from Islands Trust's Salt Spring Island office;
- continue to staff a coordinator position, funded through special tax requisition under Islands Trust Bylaw 154, filled as either an internal staff position or on a contract basis at Islands Trust's discretion; improve integration of the coordinator's workplan with related Islands Trust activities on Freshwater Sustainability Strategy implementation;

In parallel, we also recommend the following:

**Recommendation 2:** in coordination with the Provincial Government and CRD, develop and implement a plan to improve engagement with First Nations on watershed protection and governance based on the principles set out in Islands Trust's Reconciliation Action Plan and in the spirit of Islands Trust Reconciliation Declaration.

**Recommendation 3:** in collaboration with the Provincial Government and CRD, develop a policy or operational guideline for how volunteer/community science will be used in regulatory decision making based on national best practice.

**Recommendation 4:** develop a multi-agency, multi-year watershed protection strategy for Salt Spring Island in the next phase of this project; ensure this plan is nested under and integrated with Islands Trust's Freshwater Sustainability Strategy.

**Recommendation 5:** through a structured decision-making process involving current SSIWPA members and other interested stakeholders, strive to develop consensus on longer term governance reforms to improve watershed protection based on the evaluation criteria and options set out above in section 3.12 and section 4.

## 6.0 Conclusion

The report reviewed the current approach to coordinating watershed protection policy on Salt Spring Island, focused primarily on SSIWPA, including current strengths and weaknesses. It identified a number of challenges with the status quo. However, it also revealed that SSIWPA participants value the opportunity to come together in a collaborative forum to discuss shared policy concerns and develop programs and projects. The report identified seven alternative long-term governance arrangements.

Our recommendations favor an interim solution, wherein current activities coordinated under SSIWPA would be delivered as service by Islands Trust going forward. Meanwhile, governing authorities are advised to improve engagement with First Nations, develop a multi-agency, long-term plan for watershed protection, and develop consensus on governance reform through a structured decision-making process.

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## **Appendix 1: Methodology**

This report was informed by the three primary sources:

### **Literature Review**

We reviewed several dozen documents directed to us by Islands Trust staff, contractors, and other sources. These included Islands Trust Council reports and policies, annual reports, planning documents, presentations, educational collateral, websites, several key technical reports completed by staff consultants, and other miscellaneous documents. A bibliography of literature reviewed can be found in Section 7. This literature review provided context for the situation analysis and key documents are referenced throughout this report.

### **Interviews**

The methodology for the interview portion of the research started with the project team identifying and contacting candidates. Interviewees included staff, contractors, elected officials or volunteers from regional governments, water service providers, the Provincial Government, and community non-governmental organizations. All interviewees are involved in monitoring, planning, advocacy, or outreach related to water services or watersheds on Salt Spring Island. Interview appointments were booked ahead of time, generally a week in advance. The interviewee was sent a discussion guide beforehand (found below). In total, 14 interviews were conducted involving 15 informants (one session included two people). All interviews were conducted virtually using Zoom. Interviews were semi-structured in nature, typically lasting about an hour. Interviewees were advised that they would not be identified personally in project reports, but that brief, unattributed quotes from them might be used to illustrate findings. Interviews generally followed the questions set out in the discussion guide, but the interviewer was free to follow new topics in the context of the discussion. Afterwards, a copy of our notes was sent to each informant for validation. Some individuals provided additional feedback, which was incorporated into revisions.

### **SSIWPA Workshop**

A virtual workshop was held on 13 December 2021, involving 17 attendees from the SSIWPA Steering Committee, its Technical Working Group, and support staff from government agencies. A short pre-reading package was distributed a week before the event. The session started with an overview presentation then moved into plenary and small group discussions that were actively facilitated. The format was designed to solicit input from the group on SSIWPA's role in watershed protection coordination and on specific issues identified during interviews and the literature review. Notes were taken and this information was subsequently digitized, compiled, and analyzed to inform this report. A follow up session was held with SSIWPA Steering Committee on 28 January 2022 to discuss research findings and member preferences around evaluation criteria. Results are discussed in section 3.12 in the main body of the report.



## Salt Spring Island Watershed Stewardship and Protection Situation Analysis and Options Identification Report Interview Discussion Guide

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Multiple players have roles in watershed stewardship and protection on Salt Spring Island. However, there is currently no comprehensive plan to coordinate the actions of the agencies, organizations, and individuals with an interest in these issues.

Islands Trust engaged [Econics](#) to produce a situation analysis and options identification report that will review the current approach to coordinating watershed protection policy on Salt Spring Island. The project will also look Salt Spring Island Water Protection Alliance's (SSIWPA) strengths and weaknesses, how it can be strengthened, or alternatives to it. The process will include:

- a literature review to identify the policy context,
- interviews with key stakeholders, and
- two workshops with SSIWPA members and one workshop with Islands Trust staff.

Subject to the report's recommendations, a subsequent phase of this project may include developing a Salt Spring Island Watershed Stewardship and Protection Strategic Plan.

All work will build on and support implementation of the federation-wide *Freshwater Sustainability Strategy*, which was developed in 2021 and is scheduled for endorsement by Islands Trust Council in December.

The questions below will guide our scheduled interview, which will take about one hour to complete. More information about the project and how your input will be used will be provided at the start of the interview. Meanwhile, if you have any questions or concerns, please contact Kirk Stinchcombe at [kirk@econics.com](mailto:kirk@econics.com) or +1 250 588 6851.

### Discussion Questions

1. How did you become involved in watershed stewardship on Salt Spring Island? What is your current role?
2. How long have you been involved with SSIWPA? Which group or organization do you represent on the SSIWPA Steering Committee? What is the mission of that group?
3. What do you think SSIWPA's major accomplishments have been since 2014?
4. Is watershed protection on Salt Spring Island adequately resourced? How big an issue is resourcing?
5. What currently works well with SSIWPA? What are the major shortcomings with SSIWPA watershed stewardship coordination processes and results? What could be improved?
6. If you could remake the world any way you wanted, how would you structure watershed stewardship coordination on Salt Spring Island?

# Agenda

**What:** Salt Spring Island Watershed Protection Alliance  
Situation Analysis Workshop

**When:** Monday December 13  
9am to 12pm

**Who:** SSIWPA Steering Committee members, Technical Working Group members,  
select Islands Trust and CRD staff and contactors, and Econics

**Where:** Virtual Meeting Via Zoom

- Why:**
- To gather input from SSIWPA members about the current approach to coordinating watershed protection on Salt Spring Island
  - To discuss specific challenges around citizen science, drinking water source protection, and inter-agency coordination (including with NGOs)
  - To discuss SSIWPA’s strengths and challenges
  - To review next steps in the project

1. Introductions
2. Project overview and key findings to date (presentation)
3. Brief review of SSIWPA objectives from previous planning exercises (plenary)
4. Break out groups
  - SSIWPA and citizen science
  - SSIWPA and drinking water source protection
  - SSIWPA and inter-agency coordination (including NGOs)
5. Break
6. SSIWPA strengths and challenges (plenary)
7. Next steps

**Notes:**

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**Facilitator:** Kirk Stinchcombe, Econics (cell: 250 588 6851; [kirk@econics.com](mailto:kirk@econics.com))

## Appendix 2: Water Service Providers and Jurisdictional Responsibilities

The following table provides a summary of water service provision on Salt Spring Island. The table on the next page provides an overview of how jurisdiction over freshwater sustainability matters is divided among different agencies and organizations.

**Salt Spring Island Water Service Providers**

Water System*	Estimated Population	Ownership	Serviced by	Source of Water
North Salt Spring Waterworks District	5,500	NSSWD	NSSWD	Surface
Highland/Fernwood Water Service	672	CRD	CRD	Surface
Beddis Water Utility	267	CRD	NSSWD	Surface
Fulford Water Service	200	CRD	NSSWD	Surface
Mt. Belcher Improvement District	100	ID	NSSWD	Ground
Cedar Lane Water Service	78	CRD	NSSWD	Ground
Erskine Water Society	76	Private	NSSWD	Ground
Scott Point Improvement District	58	ID	NSSWD	Ground
Harbour View Improvement District	35	ID	Private	Ground
Cedars of Tuam Water Service	34	CRD	CRD	Ground
Private wells/strata systems/other water systems (estimated)**	3,620	Private	Private	Ground
<b>Total***</b>	<b>10,640</b>			

ID = Improvement District

\* List does not include Piers Island Improvement District or Secret Island Waterworks District, both of which are in the Salt Spring Island Local Trust Area, but not on Salt Spring Island itself.

\*\* Strata systems include Croftonbrook, High Hill, Maracaibo Estates, Merchant Mews, Reginald Hill, and Swan Point. This group also includes resort and cottage systems and other water systems regulated by Island Health that are not served by water systems listed above.

The list also does not include the CRD-operated Ganges Sewer System or the Burgoyne Bay Transfer Station.

\*\*\* Population estimate based on [Statistics Canada 2016 census profile](#).

Source: modified from Innova Strategy Group (2020)

### Freshwater Sustainability Jurisdictional Responsibilities

	Water Service Provision	Drinking Water Regulation	Land Use Planning and Regulation	Building Permit Approvals	Water Knowledge and Science	Water Allocation and Licensing	Pollutant Discharge	Parks and Recreation	Roads and Drainage	Agriculture	Fisheries and Wildlife
Islands Trust			X		X						X
First Nations Governments	X		X		X		X			X	X
Federal - Fisheries and Oceans Canada					X						X
Federal - Natural Resources Canada					X						
Federal - Geological Survey of Canada					X						
Federal - Water Survey of Canada					X						
BC Ministry of Environment and Climate Change Strategy		X			X	X	X	X			X
BC Ministry of Transportation and Infrastructure			X						X		
BC Ministry of FLNR		X			X	X	X				X
BC Ministry of Agriculture					X					X	
BC Ministry of Health		X			X						
BC Environmental Assessment Office	X		X		X						
Capital Regional District	X		X	X	X			X			
Island Health		X			X		X				
Improvement districts and other water purveyors	X				X						
Community and stewardship groups					X						
Private sector	X		X		X					X	X
Residents	X				X		X			X	X

Source: Adapted from Islands Trust, 2021

## Appendix 3: 2019 SSIWPA Priority Problems and Actions “Report Card”

\* also "ongoing"

Priority Problem 1:	Water availability and use (demand) is unknown for all watersheds and groundwater neighbourhoods.	Complete	In progress	Not started	Lead	Notes
1-1	Quantify supply and demand for the following lake sources: Cusheon, Weston, Bullock and Stowell. (Model and/or empirical evidence.)		✓		IT, WPS - Flow & Level Monitoring; CRD - Weston	Lake level monitoring first step - all C, W, B, S ; Weston - Water availability and Climate Change Assessment (CRD)
1-2	Determine consumption from all surface and groundwater sources. (Survey)	✓			SSIWPA	SSI Water System Survey 2020 (Cowan, October 2021)
1-3	Delineate well catchment areas, hydraulic conductivity and supply capability for groundwater sources.		✓		IT (FLNR, TWG)	GW Recharge 2019 delineates zones; Supply capability in progress each GW zone
1-4	Meter non-domestic wells and non-domestic surface water withdrawals.		✓		IT (FLNR, TWG)	Water system non-domestic GW = completed/metered; Agriculture/commercial non-domestic GW = not metered; Surface non-domestic = not metered
Priority Problem 2:	There is a need for clear guidelines, promotions and incentives for rainwater harvesting systems.	Complete	In progress	Not started	Lead	Notes
2-1	Develop and implement incentives for rainwater harvesting.	✓	✓*		TSS, CRD (SSIWPA)	2021 complete; plan to repeat; funding not long term
2-2	Create a "User Guide for Residential Rainwater Harvesting", including topics as follows: Non-potable, Potable, CSA Standards, Island Health Guidelines, New BC Building Code Requirements, System Maintenance Guide, New Construction and Retrofits	✓	✓*		SSIWPA (TWG)	2021 Non-Potable RWH Guide, Removed: Regional Potable RWH Guidelines for Professionals
2-3	Develop and deliver education about rainwater harvesting, including: workshops for professionals, workshops for user types (e.g. residential, agricultural, etc.).	✓	✓*		SSIWPA (TWG)	3 webinars, campaigns, Fall Fair, Virtual Tour, Potable and Multi-family RWH Myth Busters, more.
2-4	Conduct advocacy and assembly of agencies (ie. CRD Building Department, Island Health) re: Building Code, multi-family, Islands Trust Policy 4.4.2.	✓			SSIWPA	Was completed for feasibility of potable RWH guide for professionals - not feasible
Priority Problem 3:	Policies for proof of water lack clarity, harmonization and specifications for alternative sources	Complete	In progress	Not started	Lead	Notes
3-1	Amend Salt Spring Island Official Community Plan to strengthen policies about alternative servicing; include required quantities, impact on neighbouring wells.			✓		
3-2	Amend Land Use Bylaw (355) to require specific quantities and demonstrate non-impact on adjacent properties and ecosystems/surface water elements. (*Make prescriptive.)			✓		
3-3	Amend Building Code to meet Land Use Bylaw requirement for proof of water.			✓		
3-4	Develop and implement a Terms of Reference for proof of water that specifies alternative source equivalents and serves to harmonize applicable regulations.		✓		IT (TWG)	Proof of water at time of subdivision amendment LUB 355.

Source: Provided by SSIWPA Coordinator

**Purpose**

To develop, under the guidance of a qualified consultant, a strategic plan to guide and prioritize watershed protection work on a medium-term basis (5-to-10 years) to better support Salt Spring Island Watershed Protection Alliance member agencies in advancing effective, equitable and modernized land and water use planning.

**Background**

Section 24(2)(b) of the Islands Trust Act allows Local Trust Committees to regulate the development and use of land for the purposes of carrying out the object of the Trust. This means that local trust committees can use their regulatory powers to preserve, protect and guide restoration of watersheds.

In 2013, Islands Trust Council adopted Bylaw No. 154 which delegated authority to the Salt Spring Island Local Trust Committee (LTC), for the purpose of preserving and protecting the quality and quantity of water resources within the Salt Spring Island Local Trust Area, the power to:

- Coordinate and assist in the determination of regional, improvement district and government of British Columbia policies;
- Coordinate the implementation of regional, improvement district and government of British Columbia policies; and
- Coordinate the carrying out of regional, improvement district and government of British Columbia policies

To date, the LTC has used this delegated authority to fund and coordinate the Salt Spring Island Watershed Protection Alliance (SSIWPA). SSIWPA has advanced understanding, agency cooperation, and community engagement in watershed issues. SSIWPA undertakes an annual work planning exercise to identify water issues of concern to SSIWPA’s membership and wider community in the hope that member agencies will undertake projects to address the issues raised. However, a longer range strategy for watershed protection on SSI has not been developed.

**Objectives**

This project has two objectives:

- 1) Improve the coordination of watershed stewardship and protection policy on Salt Spring Island through:
  - a) an external review of current approaches to watershed stewardship protection policy; and
  - b) Analysis of, and recommendations for, the types of planning processes, policy/guidance documents, or mechanisms that will improve watershed stewardship and protection.
- 2) to better support Salt Spring Island Watershed Protection Alliance member agencies in coordinating and advancing effective, equitable, and modernized land and water use planning by developing a strategic plan to guide and prioritize watershed protection work on Salt Spring Island on a medium term (5-to-10 years) time frame.

**In Scope**

- 1) Situation Analysis and Option Identification
  - Review current approaches to watershed stewardship and protection policy coordination on Salt Spring Island;
  - Review documented watershed protection issues facing salt Spring Island;
  - Stakeholder interviews w/in and outside of SSIWPA about SSIWPA and watershed protection issues generally;
    - Engagement will include subject-specific stakeholder engagement on Coastal Douglas-fir and Associated Ecosystem Protection in the context of watershed protection
  - Engage First Nations in discussion about how they could be involved in water policy coordination;
  - Assess the performance SSIWPA;
  - Recommendations to improve watershed protection policy coordination based on best practices in other jurisdictions, in order to implement future watershed protection plans;
  - Recommendations to appropriately fund coordination of watershed protection policy on Salt Spring Island;
  - Recommendations about appropriate planning processes, policy/guidance

**Out of Scope**

- Watershed Assessments
- Implementation of strategic plan
- Development of new tools

	<p>documents, or mechanisms to improve watershed stewardship and protection; and</p> <ul style="list-style-type: none"> <li>• Recommendations and justification for the 2022/23 special tax requisition amount.</li> </ul> <p>2) Watershed Stewardship and Protection Strategic Plan</p> <ul style="list-style-type: none"> <li>• Apply POLIS Water Champion Handbook Stepping Stones;</li> <li>• Identify and engage relevant agencies, First Nations, stakeholders and broader community to: <ul style="list-style-type: none"> <li>○ Establish stakeholder roles and responsibilities as they relate to watershed protection on SSI, as well as their respective capacities and desired outcomes;</li> <li>○ Identify watershed protection challenges;</li> <li>○ Identify knowledge gaps;</li> <li>○ Identify and prioritize potential tools (including Water Sustainability Act) and best practices to address those challenges;</li> </ul> </li> <li>• Situate SSI watershed strategic plan in the context of other plans and initiatives (CRD/NSSWD Integrated Water Management Service Review, IT Freshwater Sustainability Strategy, IT Strategic Plan, SSI OCP, SSI Area Farm Plan, SSI CAP 2.0; Islands Trust Conservancy Regional Conservation Plan)</li> <li>• Apply a methodology that can be reproduced across the Southern Gulf Islands and/or Islands Trust Area</li> </ul>	
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**Work Plan Overview**

Deliverable/Milestone	Date
LTC endorse project charter and direct staff to proceed with procurement	May 25, 2021
Procurement process	September 2021
Situation Analysis and Option Identification Process	October 2021 to January 2022
Situation Analysis and Option Identification report received	February, 2022
Strategic Plan development	March 2022 to August 2022
Final Deliverables received	September 2022

Project Team		Budget		
Jason Youmans	Project Manager	Salt Spring Island Water Sustainability Top Priority Project		
Shannon Cowan	Project Coordination	Fiscal	Item	Cost
William Shulba	Technical Support	21/22	Consulting Services	\$15,000
Lisa Wilcox	First Nations Support	21/22	FN Engagement	\$2,500

Rob Pingle	Administrative Support	<b>21/22</b>	<b>Total</b>	<b>\$17,500</b>
<b>Director Approval:</b>  <b>Date:</b> DD, MM, YYYY	LTC Endorsement: Resolution #: SS-2021-98 Date: 25, 05, 2021	22/23	Consulting Services	\$35,000
		22/23	FN Engagement	\$5,900
		<b>22/23</b>	<b>Total</b>	<b>\$40,900</b>



**ISLANDS TRUST**  
**SSIWPA Coordination Budget 2022-23**

Adopted November 25, 2021

	<b>Draft Budget 2021-22</b>	<b>In-Kind</b>
<b>REVENUES</b>		
SSI LTC Tax Requisition	75,500	
In-Kind Staff Time	-	1,000
<b>Total Revenues</b>	<b>75,500</b>	<b>1,000</b>
<b>EXPENSES</b>		
<u>Coordination</u>		
Coordinator Contract	60,000	
	60,000	
<u>Events and Communications</u>		
Communications Materials	5,200	
Events	2,700	
Website Hosting	2,000	
	9,900	
<u>Meetings</u>		
Steering Committee	280	
Technical Working Group	280	
Rainwater Subcommittee	280	
Minute-taker	800	
Meeting Software Licensing Fees (Zoom)	120	
In-Kind Staff Time	-	1,000
	1,760	1,000
<b>Total Expenses</b>	<b>71,660</b>	<b>1,000</b>
<b>Annual Surplus (Deficit)</b>	<b>3,840</b>	<b>-</b>

SSIWPA Workplan April 1, 2022-March 31, 2023									
Area or Watershed	Lead Agency	Quarter:	1	2	3	4	Partner Agencies	Status	
<b>New Project:</b>									
<b>Policy and Planning</b>									
Watershed Protection Strategic Plan Phase 2	Island	IT					All	Not Started	
<b>Ongoing Projects:</b>									
<b>Water Availability Analysis</b>									
Water Availability and Climate Change Assessment - Results Integration	Weston	CRD, IT					FLNR, Fulford Commission	Not Started	
Groundwater Availability	Cedar Lane	CRD					FLNR, Cedar Ln Commission	Not Started	
<b>Monitoring</b>									
Groundwater Well Monitoring	Island	IT+FLNR						Ongoing	
Lake Level Monitoring	Bullock	IT						Ongoing	
	Cusheon	IT						Ongoing	
	Weston	IT						Ongoing	
	Stowell	IT						Ongoing	
<b>Communications</b>									
Messaging and outreach: existing materials - rainwater rebates	Island	Transition SS					CRD, SSIWPA	funding permitting	
Messaging and outreach: existing materials - rain systems, groundwater & lakes (algal blooms)	Island	SSIWPA - TWG					FLNR	Ongoing	
Climate Change Adaptation for Watershed Resilience...	Maxwell and Rosemurgy Lakes	Transition SS					TWG (36 person-h), SSIWPA (20 h)	Not Started	
Annual Report	Island	SSIWPA						Annually	

September 14, 2021

## Salt Spring Island Watershed Stewardship and Protection Strategic Plan

### **First Nations Engagement Strategy**

With the assistance of Islands Trust Senior Intergovernmental Policy Advisor, staff intend to implement a First Nations engagement strategy building on the work done as part of the greater Islands Trust Freshwater Sustainability Strategy. This work will occur in two streams:

- At the community level, engage with Cultural Knowledge Holders and Elders to gain a greater understanding of the cultural significance, oral history, and Indigenous ways of knowing related to the watersheds of the Salish Sea Basin - specifically Salt Spring Island - and the stewardship of the lands and waters of the watershed; and
- At the governmental-to-government level, engaging First Nations staff or representatives of the First Nations that have treaty or territorial rights and title in and around Salt Spring Island.

Islands Trust staff have used the engagement model described above in other projects, with successful results and, depending on capacity, may hire a consultant to facilitate the watershed planning process and event management involving First Nations community engagement with Elders, Cultural Knowledge Holders, and/or youth. This draft strategy has been assembled for the purpose of fiscal 2022/23 budgeting.

#### *Cultural Learning*

- 1) Staff and/or a consultant will familiarize themselves with relevant documents related to Indigenous perspectives on watersheds and freshwater, including, but not limited to, relevant articles from the UN Declaration on the Rights of Indigenous People; Assembly of First Nations National Watershed Protection Strategy; First Nations Fishery Council Protecting Water Our Way; Indigenous Water Governance in Canada: Annotated Bibliography; Indigenous Watershed Initiatives and Co-Governance Arrangements: A British Columbia Systematic Review. As well, any consultants hired to this project will familiarize themselves with Islands Trust reconciliation work and principles.
- 2) Staff and/or a consultant will review the recordings, meetings notes, and final outcomes of the Indigenous engagement framework used in the Islands Trust Freshwater Sustainability Strategy.
- 3) Staff and/or a consultant will seek information interviews with Indigenous Cultural Knowledge Holders with specific knowledge of Salt Spring Island and ensure that plan development incorporates and is informed by the engagement. Staff will return to those knowledge holders to determine whether their perspectives have been accurately captured.

#### *Engagement with Nations with Treaty and Territorial Interests*

- 1) Staff will advise First Nations of the LTC's plan to begin the watershed planning process and seek guidance from First Nations on Indigenous Cultural Knowledge Holders or community members they would like to put forward to assist.

- 2) Staff will share any draft documents with WSANEC Leadership Council and First Nations with treaty and territorial areas within Salt Spring Island for their review and feedback. Staff will incorporate feedback received via these two bodies.

*Anticipated Budget*

<b>Activity</b>	<b>Cost</b>
Indigenous Cultural Knowledge Holder engagement	\$4,000
WSANEC Leadership Council engagement	\$1,700
Individual First Nations engagement eg: Penelakut, Halalt, Malahat, Cowichan, BOKÉĆEN,	\$2,700
<b>Total</b>	<b>\$8,400</b>

*Funding Sources*

First Nations engagement in the development of the Salt Spring Island Watershed Stewardship and Protection Strategic will be funded through unspent special property tax requisition funds accumulated over previous fiscal years. This is the same account from which development of the greater plan is being funded.

While the necessary funds are available in the unspent special property tax requisition reserve, staff will seek grant opportunities as appropriate to offset costs to the SS LTC, or expand the scope of the engagement program if feasible.