

From: David Rapport [<mailto:>]
Sent: Wednesday, November 28, 2018 1:09 AM
To: Peter Luckham
Cc: Peter Grove; Laura Patrick; Sue Ellen Fast; Dan Rogers
Subject: SSIWPA's Funding Request for 2019-2020

November 28, 2018

Mr. Peter Luckham
Chair, Trust Council
Islands Trust
#200 1627 Fort Street
Victoria, BC V8R 1H8

Dear Mr. Luckham:

Please see attached letter.

Kindly acknowledge receipt, and formally distribute to the Trust Executive and the Trust Council.

Best wishes,

David Rapport

Mr. Peter Luckham
Chair, Trust Council
Islands Trust
#200 1627 Fort Street
Victoria, BC V8R 1H8

November 28, 2018

Dear Mr. Luckham:

We are writing to you to express our concerns regarding SSIWPA's request for a special tax requisition to fund its proposed work for 2019-20. It is our considered judgment that:

1. SSIWPA's request for 2019-2020 funding is without merit. We detailed our objections in our recent Guest Column in the *Driftwood* (November 14, 2018, "It's Time to End the SSIWPA Boondoggle") and an additional commentary in today's paper, as well as in various articles in previous years. Our most recent *Driftwood* articles (November 14 and 28, 2018) are attached.

Over the past five years, Salt Spring taxpayers have contributed some \$500,000 to SSIWPA's coffers by way of special tax requisitions. In spite of that significant amount of funding, SSIWPA has failed to show any concrete signs of progress in accomplishing its mission of coordination and science-based analysis of water issues on Salt Spring Island.

And that is certainly not just our opinion. SSIWPA's management plans for St. Mary Lake and Cusheon Lake (mostly regurgitations of pre-existing plans for the two lakes) have had little or no uptake. The Alliance's key objective of better coordination among agencies with a stake in water quality and quantity on the island has bit the dust with the very public withdrawal of SSIWPA's main partner, North Salt Spring Waterworks District (NSSWD). In severing its ties with SSIWPA, NSSWD openly stated that it can no longer justify its investment of time, energy, and resources in "subscribing to the distraction of SSIWPA". Behind the scenes, the NSSWD Trustees were more outspoken. They characterized SSIWPA's research as amateurish, duplicative, and carried out in a manner that would not meet "industry standards."

As well, Dr. John Sprague, a toxicologist who is intimately familiar with the issue of eutrophication of our lakes, expressed disappointment in SSIWPA (letter to the *Driftwood*, November 7, 2018), concluding that the monies given to SSIWPA for "coordination" would have been better spent on competent science-based research.

Reflecting the mood of the community, a November 14, 2018 Editorial in the *Driftwood* ("Dwindling Returns") calls for reconsideration of support for SSIWPA, as it has been "hard to see exactly how much benefit has been derived from the \$100,000 per year paid by Salt Spring taxpayers to the Islands Trust for SSIWPA."

While the idea of bringing together our water districts and other Agencies with an interest in the quality and quantity of water on Salt Spring is a worthy one, from the outset SSIWPA has woefully lacked the expertise and scientific authority to accomplish its goals. Its vision has been far too narrow: it espoused an approach that seeks to manage water downstream rather than "manage" (that is, modify) our behaviors upstream, so as to curtail further anthropogenic stress

on our fragile watersheds. Critically missing from SSIPWA's activities is a catalogue, let alone an analysis, of the development pressures that over the decades have led to the ongoing degradation of our water bodies and water sources.

Short of a broad vision and a solid framework, the Alliance has become little more than a clearinghouse for assembling catch-as-catch-can materials, regurgitating old management plans, and showcasing work done by other agencies and external consultants. In this connection, it is highly doubtful whether the recent study on groundwater wells, in which SSIWPA appears to have had only a minor role, will add any more substantive information relevant to water management or coordination. In sum, it has been hard to see what, if anything, SSIWPA has delivered by way of "value added" in relation to water issues on the island.

Given the above, we call upon Trust Council and Trust Executive to deny SSIWPA's request for funding for 2019-2020 and to terminate its support.

2. The compensation paid to the SSIWPA Coordinator ought to come under intense scrutiny. Justification for the Coordinator's high-level compensation remains opaque. Few Salt Spring Islanders were aware that the overwhelming bulk of SSIWPA's taxpayer-funded budget over the past five years went to compensate the Alliance's Coordinator (approximately \$425,000 total, of which exactly \$84,965.77 for fiscal 2017-2018 alone). More than a few eyebrows have been raised on the island as that disturbing fact has become more widely known. As far as one can tell, what islanders got for that significant portion of their taxpayer dollars was mainly secretarial services (arranging meetings, corresponding with partners, assembling materials, etc.).

Furthermore, that high level of compensation went to an individual whose professional credentials are irrelevant to SSIWPA's mission and who had not previously commanded comparable pay. Originally Mr. Grams, SSIWPA's Chair, introduced the Coordinator as a high-end academic, a Professor from UBC. However, an online CV for the Coordinator (dated 20/07/2012) paints an entirely different picture. According to the CV, the Coordinator has a background in plant genetics rather than fields central to advancing SSIWPA's goals such as aquatic ecosystem assessment and water management. As well, it appears that, prior to joining SSIWPA, the Coordinator only held minor appointments at UBC—most recently, since 2008, as "adjunct professor" and "sessional lecturer". Such positions, the Trust should have known, are in no way comparable to that of a career Professor, in either status or remuneration. It would appear that, in repeatedly approving SSIWPA's special requisitions, the Trust may have failed to exert due diligence and adequate oversight with respect to Coordinator's qualifications and contract fee.

Given these circumstances, we call upon Trust Council and Trust Executive to initiate an independent, detailed audit of expenditures for "coordination services" from the onset of SSIWPA's operations; in particular, to examine: 1) the Coordinator's credentials in water management/assessment, 2) the rationale for the rate of compensation given to the Coordinator, and 3) the nature of services provided with time billed. Depending on the findings, redress in the expenditure of public monies may be called for.

We ask that you kindly acknowledge receipt of this letter of concern and the two related attachments, and circulate these three documents to the **incoming Trust Executive** and to the **newly elected Trust Council**, in good time for their consideration of SSIWPA's request for funding for 2019-2020.

Sincerely,

David J. Rapport, PhD, F.L.S. (London)

Luisa Maffi, PhD

Dr. Rapport served as Senior Scientist and Science Advisor to Statistics Canada from 1982 to 1996. In that capacity, he co-managed and co-authored Canada's First State of the Environment Report. He also spearheaded the development of the Pressure-State-Response Statistical System, subsequently adopted worldwide for assessing and monitoring the impacts of human activities on the environment. He served as Professor and Eco-Research Chair at the University of Guelph from 1994 to 2004, and has held numerous Titular and Visiting professorships in Canada and abroad, including at the University of Toronto, Western University (London, ON), University of Tokyo, and the Institute for Applied Ecology, Chinese Academy of Sciences, Shenyang.

Dr. Maffi is an anthropologist who has pioneered the concept and field of biocultural diversity—the interconnected diversity of life in nature and culture. She has held research grants and fellowships from numerous science councils and foundations in the USA and research positions at the Field Museum of Natural History in Chicago and the Smithsonian Institution in Washington, DC, and has collaborated with and lectured at research and academic institutions worldwide. She is co-founder (1996) and Director of Terralingua, an international NGO devoted to sustaining biocultural diversity, and spearheads the organization's multifaceted research, policy, education, and outreach work.

Maffi and Rapport have served as advisors to major environmental programs of the World Bank, the United Nations Environment Program, the International Union for the Conservation of Nature, the United Nations Development Program, the World Wildlife Fund, UNESCO, the Convention on Biological Diversity, the Helsinki Commission, US-EPA, the Auditor General of Canada, Fisheries and Oceans Canada, and Environment Canada, among others.

Attachments:

Rapport and Maffi, Guest Column, *Driftwood*, November 14, 2018: "It's Time to End the SSIWPA Boondoggle"

Rapport and Maffi, In Response, *Driftwood*, November 28 (forthcoming).

Time to End the SSIWPA Boondoggle

David Rapport and Luisa Maffi

We Salt Spring Islanders are a patient lot, and more often than not give the benefit of doubt to those who are keen to be of service. We did this in a major way with the Salt Spring Island Water Protection Alliance (SSIWPA), formerly the Salt Spring Island Water Protection Authority. After all, water on this island (and all of the Gulf Islands) is a long-festering concern, and it's becoming ever more critical in the face of climate change—especially so when coupled with rapid growth in our population and the associated development within our watersheds. Against that background, the idea of bringing together agencies that have a stake in the quality and quantity of water available on Salt Spring is a worthy one. However, SSIWPA has proved to be the wrong vehicle for accomplishing any of this.

Year after year for the past five, our Trustees have recommended a special tax requisition—on the order of \$100,000 per year—to fund the activities of SSIWPA. At every turn, we have been persuaded by the SSIWPA Chair (and outgoing Trustee) Mr. George Grams, that ‘tremendous achievements are just around the corner’. We’ve heard these unsupported statements over and over again, while hearing precious little as to how the monies have been spent.

In fact, unbeknown to most of us, nearly all that yearly amount has gone to a single individual for what has been vaguely described as “coordination services”. As far as one can tell, that has amounted to little more than organizing sparsely attended meetings of SSIWPA partners, distributing the minutes of said meetings, and cobbling together a few reports from existing materials on watershed management—with a couple of recycled “expert” assessments, previously done by others for other purposes, thrown into the mill. It's a meager output to say the least, hardly justifying the more than \$500,000 of taxpayer monies spent thus far.

And yet, despite the increasing dissatisfaction and disinterest of SSIWPA partners and others, SSIWPA is once again asking for additional funding to the tune of nearly \$100,000 to carry on its activities for the coming year. In one of its last acts, the outgoing LTC voted to support this request. With this prospect before us, it's time to call in the cards.

SSIWPA's essential and most important partner, North Salt Spring Waterworks District (NSSWD), has already cut bait, publicly justifying their withdrawal with a cryptic statement in the Driftwood (October 31): “Subscribing to the distraction of SSIWPA is probably not a good investment of our time, our energy, and our resources.” We are aware, however, that behind the scenes there was growing unease within NSSWD that SSIWPA was going nowhere; that the research of SSIWPA's Technical Working Group was amateurish, duplicative, and not carried out in a manner that would meet industry standards.

We have long publicly questioned SSIWPA's research, as well as its lack of transparency about its budget allocations. While purporting to focus on the health of the island's freshwater bodies, the best SSIWPA has been able to do in that connection seems to have been to (literally!) send St. Mary Lake a “Get Well Soon” card. And to recap its “flagship” finding: on the basis of sampling a handful of septic fields around St. Mary Lake, SSIWPA concluded that leakage from

septic fields had little or nothing to do with the algal blooms in the lake. Such results are lacking not only in statistical validity, but as well in the fundamental understanding of the complexity of factors contributing to algal blooms in inland waters. Yet, Mr. Grams is on record as claiming that this singularly flawed study may have saved our community millions that otherwise might have been spent linking properties in the St. Mary Lake watershed to the Ganges sewer system.

In our view, and in the view of at least some of SSIWPA's partners, it has become a rather mindless exercise in gathering "catch as catch can" data relating to our water, collected by other agencies for a variety of special purposes, and filing them away in the vain hope that they will contribute to new insights as to how to improve the health of watersheds. That is most unlikely. Such a hodgepodge of data and reports will only result in clouding over the basic issues of what has caused the deterioration in the health of our watersheds and what can be done about it.

What SSIWPA has lacked from the outset has been direction. Years back, Jack Vallentyne, one of Canada's most illustrious limnologists, penned an editorial for *Science Magazine*, by the title of "First Direction, Then Velocity". Without a clear sense of the complexity of how our collective activities influence the health of our watersheds, there is no prospect for adding value to what we already know from past efforts to come to grips with the declining water quantity and quality on the island. Without an integrated approach, there is no possibility for generating the critical data sets to track the health of our watersheds, the impacts of changes in water availability and quality on the health and wellbeing of our community, and whether or not our efforts at remedial actions amount to a row of beans.

NSSWD severed its ties with SSIWPA; it's high time that we taxpayers follow suit. SSIWPA's poor grasp of the dynamics of the watershed renders it incapable of making a meaningful contribution. Its new request for a tax requisition should be firmly rejected and its past expenditures carefully scrutinized. SSIWPA has pulled the wool over our eyes for far too long and should now be disbanded. More holistic and solid approaches to protecting our watersheds are urgently needed.

David Rapport and Luisa Maffi are Salt Spring residents that have worked for decades on ecological and cultural health of large-scale ecosystems worldwide.

Lack of Vision the Main Problem with SSIWPA

(in Press. Driftwood . November 28, 2018)

by David Rapport and Luisa Maffi

Our article in the November 14 Driftwood (“It’s Time to End the SSIWPA Boondoggle”) drew reactions in the paper’s November 21 issue from two community members who have had a close involvement with SSIWPA.

Ron Hawkins (“SSIWPA: An Essential Water Commitment”) expresses a strong faith in this “coordinated, voluntary, collaborative team approach” to bringing together agencies that have some authority over water management on the island. He suggests that we have done a “grave disservice” to SSIWPA by casting doubt upon SSIWPA’s good work, and that we have ignored the “array of significant accomplishments” displayed on SSIWPA’s website. He surmises that, to so “jaundicedly” dismiss SSIWPA, we must be “personally bitter”.

We are not sure what Ron feels we may be bitter about. We are certain of one thing, though: regarding SSIWPA, we are bitter about nothing but concerned about a lot. As we said in our November 14 article, we think the idea of bringing together agencies that have a stake in the quality and quantity of water on the island is a worthy one, but find SSIWPA to have been the wrong vehicle for that effort, and question its accomplishments. The SSIWPA website may well be chock-a-block full of self-proclaimed achievements. There is scant evidence, however, that after five years of SSIWPA activity we are one step closer to improving the condition of our island’s water. As well, the public withdrawal of NSSWD from SSIWPA casts doubt on the Alliance’s capability to not only “bring” key players together, but also “keep” them together.

For his part, Don Hodgins (“In Defense of SSIWPA... Sort of”) defends the study he spearheaded to test the long-held belief that phosphorus leaching from septic fields around St. Mary Lake is a major source of excess nutrients seeping into the lake and thus a major cause of prolonged algal blooms in the lake’s waters. He may well be right that the contribution from this source is negligible, but data collected from a handful of wells cannot prove it. Hodgins is too good a scientist not to be aware that the sample size was far too small to be conclusive. It was budget constraints rather than adequate methodology that dictated the small number of fields tested. Hodgins is also well aware that drainage from septic fields along the lakeshore is not the only potential source of nutrient input into the lake, but his study was not designed to address other potential causes of algal blooms – including runoff from disturbance in the watershed, as well as other human-induced ecological imbalances such as fisheries management and climate change.

The fundamental problem with SSIWPA has been its lack of a broad vision. That is attributable to the fact that the Alliance has lacked expertise in the fields of ecology,

anthropogenic stress on the environment, ecosystem health, economics, ecological economics, and so forth—all fields that would have helped frame the larger picture. While community-based studies or “citizen science” can serve a very useful purpose by engaging all interested parties, they can easily lead to fruitless exercises if the broad vision is not there to begin with to pinpoint and guide specific research efforts.

In grappling with our island’s environmental issues, we have fallen into the trap of seeking technical fixes to the problems “out there” instead of focusing on the problems “in here”: our maladaptive behaviors that inflict blows to the health of the island’s ecosystems—from eutrophication of our waters to loss of groundwater in the dry season, degradation of our forests, coastlines, and marine waters, ongoing loss of habitats that support biodiversity, and pollution from both on-island and outside sources. A more productive approach would look upstream to the human activities that are causing these injuries, and would seek to alter our ways of living on the island to be more respectful of the life systems that sustain us.

Concerning St. Mary Lake, that is precisely the advice that was offered years ago already by outside experts such as Profs. Asit Mazumder and Rick Nordin, both of whom made extensive studies of the eutrophication of the lake: what they recommended to address the problem was to reduce human disturbances in the watershed. A moratorium on future development in our sensitive watersheds would be a good start in the effort to pull back from anthropogenic pressures that are compromising the health of our ecosystems.

We have choices: we can either continue along the present path and limit ourselves to monitoring the degradation of our ecosystems until the island is no longer viable as a place to live; or we can pull back from the pressures while we still can, and allow the island’s ecosystem to heal and recover their capacity to sustain reasonable human needs.

825 words

David Rapport and Luisa Maffi are Salt Spring residents who have worked for decades on the ecological and cultural health of large-scale ecosystems worldwide.