

**From:** David Rapport <[REDACTED]>  
**Date:** January 4, 2019 at 1:39:02 AM PST  
**To:** Laura Patrick <[lpatrik@islandstrust.bc.ca](mailto:lpatrik@islandstrust.bc.ca)>, Gary Holman <[ssidirector@crd.bc.ca](mailto:ssidirector@crd.bc.ca)>  
**Cc:** "[pluckham@islandstrust.bc.ca](mailto:pluckham@islandstrust.bc.ca)" <[pluckham@islandstrust.bc.ca](mailto:pluckham@islandstrust.bc.ca)>, "[pgrove@islandstrust.bc.ca](mailto:pgrove@islandstrust.bc.ca)" <[pgrove@islandstrust.bc.ca](mailto:pgrove@islandstrust.bc.ca)>, Luisa Maffi <[REDACTED]>, davidrapport <[REDACTED]>  
**Subject: Request for update on our concerns about SSIWPA**

January 4 2019.

Trustee Laura Patrick and CRD Director Gary Holman, Co-Chairs, SSIWPA  
Dear Laura and Gary,

We are writing to ask what follow-up has taken place or is in the offing to our request (in our letter to you of December 19, 2018 and previously in our letter to Peter Luckham of November 28, 2018) for an in-depth review of SSIWPA's accomplishments and audit of their expenditures, with special reference to the coordinator's fees (nearly the entire budget paid by taxpayers of SSI under the special tax requisition).

As senior academics and professionals, with expertise that is highly relevant to the issue at hand, we spent a considerable amount of our time and effort to bring this matter to your attention. We did this as a pro bono service to our community, as we were convinced that the matter does warrant a careful and thorough review, in the interest of transparency and responsibility for the use of public funds.

Our letters of November 28 and December 19, 2018 are attached here for your convenience. To those documents, we can only add and/or reiterate the following:

1. Regarding SSIWPA's accomplishments or lack thereof, Gary has suggested that we are the most critical of all commentators. We may perhaps be the *most* critical, but we are certainly not the *only* knowledgeable people to have been highly critical of SSIWPA. Dr. John Sprague, who has been closely involved in water issues on the island, has said explicitly in the Driftwood that the money given to SSIWPA would have been far better used to do credible science rather than "coordination". Furthermore, already prior to SSIWPA, qualified scientists such as Profs. Asit Masumder and Rick Nordin had unambiguously made the same key point that we have: if you don't stop the bleeding (that is, stop development in the watersheds), you will not stop the consequences (that is, stop the deterioration of the watersheds). In other words, the thinking of senior scientists who have studied the situation of our watersheds and/or reviewed the outputs of SSIWPA converge on the same or similar conclusions.
2. Regarding our call for a comprehensive audit of SSIWPA's expenditures – particularly the coordination fees for 2013-2019, based on what is a matter of public record we have made the following points:
  - a. Although the person who was hired as SSIWPA coordinator was initially presented as a highly qualified "Professor from UBC", that person actually has no professional credentials in water management or the health of ecosystems and watersheds, and never held a full professorship.
  - b. The coordinator was paid an exorbitant amount for the duties performed, which appear to have been largely secretarial and part-time. The Coordinator appears to have never previously held a long-term position at a rate of compensation anywhere close to what was paid, out of public coffers, to support this activity.
  - c. The coordination aspect itself was seemingly a fiasco, as evidenced in particular by the public withdrawal of NSSWD, the main player, from the Alliance, and by their sharp critique of SSIWPA activities, which they claimed were a distraction and not meeting professional standards.

We respectfully request an update on the process and timeline for a through and transparent review of SSIWPA activities over the past 6 years, the serious critiques of the validity of their work, and the questions we have raised about justification for expenditures made for coordination activities .

Sincerely,

David J. Rapport, Ph.D, FLS (London)  
Luisa Maffi, Ph.D

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

**Bionotes:** *David Rapport and Luisa Maffi have been [REDACTED] residents of Salt Spring Island [REDACTED].*

*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).

**From:** David Rapport  
**Sent:** December 20, 2018 12:04 AM  
**To:** Gary Holman; Laura Patrick  
**Cc:** pluckham@islandstrust.bc.ca; pgrove@islandstrust.bc.ca; Luisa Maffi; davidrapport  
**Subject:** SSIWPA Follow-up and Request

December 19, 2018  
Trustee Laura Patrick  
CRD Director, Gary Holman, Co-Chairs SSIWPA  
Dear Laura and Gary,

I have recently spoken with each of you about the concerns that I and my partner Luisa Maffi have long had about SSIWPA, the way it has been run over the past five years. As you know, our concerns have focused on two key points: 1) SSIWPA's lack of vision, direction, and accomplishment (a judgment on which numerous other observers and even some of the SSIWPA participants converge), and 2) the lack of transparency and accountability about the SSIWPA budget over this period of time, with special reference to the budget justification for about 85% of the budget going to pay the coordinator.

You saw our recent articles in the Driftwood about this matter (November 14 and 28, 2018), as well as my recent correspondence with Peter Luckham (November 27, 2018) in this respect. For further background, Luisa and I wish to share with you previous correspondence with the Trust, some of which goes back all the way to 2014, when SSIWPA was just getting going.

We had expressed the same concerns from Day 1 about the lack of transparency in the SSIWPA budget. George Grams's responses at that time remained vague. Neither did we get any more clarity from Linda Adams when we then went on to addressing the issue to her. We found her response mostly perfunctory and of the "checking the boxes" kind, not at all getting into the substance of our concerns. We are forwarding to you that 2014 thread of correspondence with Grams and Adams in a separate message.

We again expressed our concerns about SSIWPA last year, when the special requisition request for 2018 was going to be tabled. I wrote to Peter Luckham several times, detailing the reasons for our concerns and sending him ample background information (see the two threads of correspondence with Luckham that we also send separately, with the related attachments). In this instance too, however, we felt that the case was not given serious consideration and that the circumstances were not carefully looked into. Dissatisfied with the persistent lack of proper consideration of the matter, we subsequently decided to forward the relevant correspondence and background material to Minister of Finance, Carol James, who has promised to look into it. This is ongoing at the Provincial level.

As the case has now become better known and understood in the community, we are also aware that our concerns are shared by many more people, including several who have held island governance positions and/or have been closely involved in island water and environmental issues.

As we mentioned to you before, we feel that the matter is quite serious and raises many red flags concerning Trust oversight, use of public funds, payments for services rendered, and actual accomplishments by SSIWPA. It is apparent to us (both as taxpayers and as seasoned professionals in relevant fields) that, before any more plans and requisitions are proposed for SSIWPA, a full investigation is required to shed light on what actually happened and to take necessary remedies for whatever may have gone wrong so far.

Specific questions that should be raised in our opinion are:

- Was this position for a Coordinator advertised? If so, when, where, and how widely was that position advertised on this island and beyond?
  - Were there other candidates, and if so, what was the selection process?
  - What were the specified qualifications and required expertise for the position, and were those appropriate and adequate for the intended role of SSIWPA Coordinator?
    - How was the level of compensation determined? Was it based on an hourly fee that the individual who was hired received for unrelated work on a short-term basis (there is mention in the documentation we're forwarding to you of a fee of \$50/hr.)? In other words, was the compensation for what appears to be (at least from the budget allocation) full-time work for 50 plus weeks/year calculated on the basis of an hourly fee for short-term work (something that would be totally out of line with professional practice)?
    - What evidence is there that the tasks (it seems largely secretarial in nature) took anywhere close to that amount of time?
    - How exactly was Trust approval undertaken? What checks and balances were applied to the fee, and the accomplishments?

From discussions with several community members, we know that they are appalled that the Coordinator, with no particular knowledge of the subject matter, was accorded nearly the entire amount of the requisition. From what we have seen of the output, there was practically zero value for money expended. And yet year after year the requisition was approved, seemingly perfunctorily, by the Trust. We, and a growing number of other island taxpayer, feel that the matter has been swept under the rug long enough, and that this cannot be allowed to happen again now. The public's faith in the Trust and our other governing institutions is on the line.

We urge the two of you, as current SSIWPA co-chairs, to launch a full audit of the past five years of SSIWPA expenditures of the Special Tax Requisition and what was accomplished for those expenditures, and to communicate the results and any related remedial action openly and clearly to the public.

With best regards,

David Rapport and Luisa Maffi

- ps. three forwarded messages with previous correspondence with the Trust and related attachments will follow.