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April 17, 2023

File No.: 11-5420-30

Via email: [livingwatersmart@gov.bc.ca](mailto:livingwatersmart@gov.bc.ca)

The Honourable George Heyman  
Water Protection and Sustainability Branch  
Ministry of Environment and Climate Change Strategy  
PO Box 9362 STN PROV GOVT  
Victoria B.C. V8W 9M2

Dear Minister Heyman,

**Re: Feedback on Watershed Security Strategy and Fund Intentions Paper**

I am writing on behalf of the Islands Trust Council to offer feedback on the Watershed Security Strategy and Fund Intentions Paper.

We are pleased to see the provincial government co-developing a Watershed Security Strategy, with First Nations, and that development and implementation of the Strategy will honour the spirit and intent of the UN Declaration on the Rights of Indigenous Peoples. We are supportive of the policy intentions in the intentions paper and look forward to being involved in its eventual implementation. This topic is of great importance to the Islands Trust Area.

In 2019, the Islands Trust Council declared a climate change emergency, committing to take urgent and fair climate action. In 2021, Trust Council affirmed that a housing equity and workforce shortage crisis exists in many of the islands within the Trust Area. As a federation of island governments, watershed protection and protection of freshwater is central to our work and our responses to the climate emergency and workforce shortage crisis.

The Islands Trust was created by the Province to:

***“preserve and protect the trust area and its unique amenities and environment for the benefit of the residents of the trust area and of British Columbia generally, in cooperation with municipalities, regional districts, improvement districts, First Nations, other persons and organizations and the government of British Columbia.”***

A key word in this object of the trust statement is ‘cooperation’. Watershed protection and sustainability, as with all land use, in the Islands Trust requires cooperation with regional districts, First Nations, improvement districts and the Province. We hope that the provincial interest to “preserve and protect” the Trust Area is considered in all relevant Watershed Security Strategy development processes and development of any subsequent legislation.

It is important to highlight that the majority of the drinking water supply on the islands is from privately managed domestic groundwater wells. The watersheds in the Islands Trust Area that generate this drinking water are lived on by residents and also support industry, transportation, recreation, and the general livelihoods of island communities. These watersheds are equivalent to engineered water systems in urban areas, but the programs Islands Trust undertakes to protect and enhance “natural freshwater assets” of the islands are not recognized by provincial infrastructure and asset management funding programs.

Thanks to funding from the Province's Healthy Watershed Initiative the Islands Trust Council developed its [Freshwater Sustainability Strategy](#) (2022-2032). This Strategy, which was informed by a number of partners including provincial government staff, identifies a number of actions. Many of these actions are not possible without external funding.

The Islands Trust has already advanced this Strategy by undertaking local and regional projects that included data collection, modeling, and mapping to provide a baseline understanding of freshwater and groundwater resources throughout the Islands Trust Area. Baseline information includes critical aquifer recharge areas and identifying vulnerable groundwater regions. Islands Trust planners are now undertaking land-use planning using this evidence-based science for a number of the Southern Gulf islands to understand water availability now and into the future of a changing climate. This type of planning is critical to evidence-based decision making, especially on islands striving to provide affordable housing to their residents while meeting the Islands Trust provincial mandate to preserve and protect the environment.

Watershed security and freshwater sustainability projects are critical to understanding growth limits and climate change impacts, and are tied directly to the implementation of housing options that increase density of development and intensity of land use.

We appreciate that the Province is proposing to consider and address risks and pressures to water sources early, in particular those related to climate change. The *Islands Trust Freshwater Sustainability Strategy* identifies actions that range from:

- improving data management and monitoring;
- completing existing research processes;
- harmonizing approvals;
- developing freshwater stewardship outreach programs;
- protecting watersheds to ensure sustainable island communities; and
- ensuring that Indigenous cultural heritage sites and practices are not adversely impacted by land-use planning.

**Requests:**

1. As the Province looks at building a strong foundation of watershed science and knowledge, we would like the Islands Trust Area to be a priority area. The Islands Trust needs the Province's support to undertake watershed security projects and increase water literacy in island communities.
2. As the Watershed Security Strategy and Fund are implemented, we ask for provincial support, through coordination and funding, for implementation of the Islands Trust Freshwater Sustainability Strategy.

Islands Trust is a special-purpose government representing over 30,000 people living within the Islands Trust Area and 10,000 non-resident property owners. The Islands Trust Area is located within Coast Salish territory and is the homeland of many Coast Salish Peoples who have called this place home since time immemorial. Islands Trust is responsible for preserving and protecting the Islands Trust Area's unique amenities and the environment through conservation-oriented land use planning and regulation, education, and cooperation with First Nations and other agencies. The Islands Trust Area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major islands and more than 450 smaller islands covering 5,200 square kilometres.

Minister Heyman

April 17, 2023

Page 3

Thank you for considering this feedback. We look forward to hearing from you.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "P. Luckham".

Peter Luckham

Chair, Islands Trust Council

[pluckham@islandstrust.bc.ca](mailto:pluckham@islandstrust.bc.ca)

Attachment 1: Islands Trust Council Policy applicable to Watershed Security Strategy

cc:

Islands Trust Area MLAs

Bowen Island Municipal Council

Islands Trust Council

Islands Trust Website

**Attachment 1.** Islands Trust Council Policy applicable to Watershed Security Strategy

Related specifically to the drafting of the Watershed Security Strategy, I draw your attention to the following policies in the Islands Trust Policy Statement, approved by the BC Minister of Municipal Affairs in 1994, which set out the commitment (position or philosophy) of Trust Council:

Policy Statement Policy	Trust Council Policy	Applicability to Policy Intention
3.1.1	Trust Council holds that: <ul style="list-style-type: none"> <li>• proactive land use planning is essential for the protection of Trust Area ecosystems,</li> <li>• protection must be given to the Trust Area’s natural processes, habitats and species , including those of the Area’s old forests, Coastal Douglas-fir forests, Garry Oak/Arbutus forests, wetlands, open coastal grasslands, the vegetation of dry rocky areas, lakes, streams, estuaries, tidal flats, salt water marshes, drift sectors , lagoons, and kelp and eel grass beds, and</li> <li>• planning must account for the cumulative effects of existing and proposed development so as to avoid detrimental effects on watersheds, groundwater supplies and Trust Area species and habitats.</li> </ul>	5
3.3.1	Trust Council holds that: <ul style="list-style-type: none"> <li>• the freshwater wetlands, bodies of surface water, natural drainage patterns, water courses, fish-bearing streams, watershed and groundwater recharge areas of the Trust Area should be identified, protected and, where possible, restored or rehabilitated, and</li> <li>• the natural wetlands of the Trust Area, including those in the Agricultural Land Reserve that have not been altered in the past for agriculture, should not be drained, filled or degraded.</li> </ul>	3
4.4.1	It is Trust Council’s policy that islands in the Trust Area should be self-sufficient in regard to their supply of freshwater.	All
5.2.1	Trust Council holds that growth and development in the Trust Area should be compatible with preservation and protection of the environment, natural amenities, resources and community character.	All
5.2.1	Trust Council holds that tree cover on the islands is of great importance and should be preserved.	3
5.1.7	Trust Council holds that economic opportunities should be compatible with conservation of resources and protection of community character.	5

The Islands Trust Policy Statement also includes the following recommendation policies which offer recommendations from Trust Council to government agencies and other decision-makers:

Policy Statement Policy	Trust Council Policy	Applicability to Intention Paper Section
3.1.3	Trust Council encourages all government agencies and non-government organizations to consider both monetary and non-monetary costs when making resource management and land use decisions.	All
3.1.4	Trust Council encourages the Provincial government and the government of Washington State to proceed with their proposal for a joint environmental monitoring system for the Georgia Basin Region.	3
3.1.5	Trust Council encourages the Provincial government to establish property tax incentives for conservation or habitat protection.	4
3.1.6	Trust Council encourages actions and programs of other government agencies which: <ul style="list-style-type: none"> <li>• place priority on the side of protection for Trust Area ecosystems when judgement must be exercised,</li> <li>• protect the diversity of native species and habitats in the Trust Area, and</li> <li>• prevent pollution of the air, land and fresh and marine waters of the Trust Area.</li> </ul>	All
3.2.2	Trust Council encourages government agencies, non-government organizations, property owners and occupiers to protect forested areas through voluntary conservation covenants and careful management.	4
3.3.2	Trust Council encourages government agencies, non-government organizations, property owners and occupiers to protect freshwater bodies, water courses, wetlands, riparian zones and aquatic wildlife habitats through voluntary conservation covenants and careful management.	4
4.2.7	Trust Council encourages the Provincial government to implement education and extension programs to promote sustainable forestry and the protection of forest ecosystems.	4
4.4.3`	Trust Council encourages the Provincial government to implement property tax incentives for the retention of groundwater and watershed recharge areas and freshwater wetlands.	4

4.4.4	Trust Council encourages the Provincial government to adopt legislation which protects the sustainability and quality of the groundwater of the Trust Area.	2
4.4.5	Trust Council encourages government agencies, corporations, property owners and residents to use innovative technologies which will permit more efficient use of the Trust Area's freshwater resources, including: cisterns, alternative sewage disposal systems, reuse of water, the treatment and use of grey water, and the use of water saving devices.	2,4