



# Appendix B – Delegation Presentation Material

Pages 2-21

**Jennifer Margison, Friends of the Gulf Islands Society** – Addressing the need for growth limits assessments in the islands of the Trust Area.

# Growth Limits for the Islands Trust Area

Friends of the Gulf Islands Society



# The Purpose of the Islands Trust

- Created in 1974 as a public trust to preserve and protect the islands' natural environment, rural character and unique amenities
- Recognized **then** that development would have to be controlled in order to achieve these goals



# Why This Issue Matters Now

- Unprecedented growth pressures in recent years
- Between 2016 and 2021, population increased 27% while BC grew only 7.6% and Canada 5.2%
- Ecosystem conversion has already surpassed safe thresholds on some islands



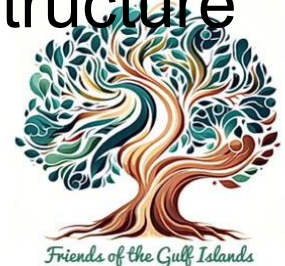
# The Critical Questions

- How many residents and visitors can the islands sustain without compromising the very values the Trust was created to protect?
- What level of development is compatible with ecosystem health?
- What preserves long-term livability?



# Why Growth Limits Matter

- Some argue: “It’s not how many people, but how we live.”
  - But the evidence shows: numbers do matter for sustainability
  - Each person uses water, creates waste and relies on ferries, roads and services
- Population affects ecological resilience and infrastructure



# Environmental Pressures

Development harms ecosystems by:

- Removing vegetation and fragmenting forests
  - Impacting wildlife and species-at-risk
- Reducing groundwater recharge and ecosystem health



# The Warning Signs

- Significant water trucking is already happening on islands
  - Gabriola, Galiano, Pender, Mayne, Saturna
- Indicates islands may already have exceeded their natural capacity
- A Trust-declared Climate Emergency in 2019 adds urgency



# A Pressure-State-Response-Model

Organization for Economic Co-operation and Development

- Pressure: Human activities that stress ecosystems
  - State: The condition of these ecosystems
- Response: The policies and actions taken to reduce damage



# Build-out Numbers: the Missing Piece

- Build-out = full development by current zoning
- Essential to estimate future population and impacts
- Zoning should reflect what the island can actually support



# What to Measure in Each Island Study

## 1. Ecosystem Health

- species diversity, forest cover, invasive species, water quality

## 2. Freshwater Availability

- balance between human use and ecosystem needs

## 3. Waste Absorption Capacity

- septic system impacts on groundwater and marine life

## 4. Service and Infrastructure

- ferries, roads, health care, housing, schools



# Key Concerns on Water and Waste

- Groundwater sustains forests, wildlife, wells
- Rainwater collection and desalination have limits
- On-site septic systems do not remove all contaminants



# Facing the Challenge

- Determining growth limits is complex but possible
  - Political courage will be required
- Some landowners may not be able to expand beyond their existing development potential



# The Precautionary Principle

*"A well-informed estimate is better than none at all."*

- Uncertainty must not justify inaction
  - Control now to preserve:
    - Ecosystem health
    - Community resilience
    - Longterm livability



# Conclusion: Plan for Limits, Plan for the Future

- Growth limits = sustainable future
- Protecting nature protects community well-being
  - The time to act is now

*"For the sake of current and future generations – and the natural world we all depend on – it's time to act."*



# Friends of the Gulf Islands Society

See our two new reports:

Build-out Analysis Needed for Each Islands Trust Island

Growth Limits Assessment for the Islands Trust Area

[friendsofthegulfislands.ca](http://friendsofthegulfislands.ca)



**Friends of the Gulf Islands Society**  
**Build-out Analysis Needed for Each Islands Trust Island**  
**British Columbia, Canada**  
**November 17, 2025**

A build-out analysis for each island would determine how many people would likely be living there if all properties were developed to their current zoning potential. This document explains in more detail what “build-out” is, how it is determined and why it is needed.

**Explaining build-out** Each island in the Trust Area is divided into parcels or lots. This is how land ownership is held and tracked in British Columbia. Each lot has a Parcel Identification Number or PID that allows the Provincial government and others, to track who owns each parcel of land.

Local government (or in this case each island’s elected Local Trust Committee) passes a Land Use Bylaw to control what uses can occur on each category of lots. For example, some lots are zoned residential and certain uses are allowed there. Other lots are zoned commercial or industrial, likewise with a list of allowed uses. Generally, the zoning depends on lot size and location.

**What is subdivision potential?** When most people buy a lot, that lot cannot be further divided without special permission from their local government. However, there are lots (usually larger) that have what is called “subdivision potential”. This means they can be further divided into more lots with the number being controlled by the Land Use Bylaw. Subdividing property is a complicated process involving (in the Trust Area) the Ministry of Transportation, proving adequate water, location of driveways and more. At the end of the process and if approved, the land has been divided into more lots and the owner can sell the new individual lots to new owners.

**How to count development potential?** To determine how many residences are allowed on an island by current zoning, first we count the number of existing lots on an island. Then we also have to count how many additional lots are allowed to be created by dividing the lots with subdivision potential under the zoning bylaw.

**Lots zoned for multiple residences** If there are lots that are zoned to allow multi-unit residences, i.e. apartments or condos, duplexes, suites or cottages, then those additional residences must be counted.

**Floor Area Ratio** Another example of zoning for more than one residence is a policy known as Floor Area Ratio (FAR) or Flexible Zoning Model. This policy permits adopting a zoning (Land Use Bylaw) that would set a maximum area to be covered by a building footprint and gives the land owner a choice how to allocate that space, i.e. by allocating that building footprint to one or more residences.

For example, Mayne Island’s Local Trust Committee adopted such a bylaw that allows the following on a few lots, previously zoned for only one residence:

(a) On lots less than 1.5 acres, one additional dwelling is permitted if the total combined square footage of all dwellings does not exceed 2500 square feet.

(b) On lots having between 1.5 acres and 3 acres, two dwellings, and a cottage are permitted if the total combined square footage of all dwellings does not exceed 3500 square feet.

(c) On lots between 3 acres and 10 acres, three dwellings and a cottage are permitted if the total combined square footage of all dwellings and cottages does not exceed 4750 square feet. (It is not clear whether 3 acre lots fit into category (b) or (c).

Such a bylaw could allow even more residences for larger floor areas. Since the number of future possible residents is not known, an estimate would be made.

**How to estimate the number of residents?** We can estimate how many people will live in those residences by multiplying the average number of residents in each residence on that particular island (as determined by Statistics Canada) by the number of allowed residences. The average number of residents per residence across the Islands Trust area is two.

**Objections to determining build-out** When one of our members asked a staff person about determining build out, she was told that that this was too complicated, too expensive and that residents would not understand the result. We disagree. Those residences may not be built in the next year or even the next few years but development is likely to eventually occur. -Planning is not just about “now” but about planning for the future.

**Is it possible to do a build out analysis?** The answer is “yes”. It has already been done on Gabriola Island. A build-out report was prepared for Gabriola in 2021. According to a Gabriola trustee at that time, it still needed some tweaking but gave a general idea of build-out based on current zoning. The method used to prepare the Gabriola build out analysis was to be made publicly available for use on other islands. But that has not yet happened. The lack of such data was also referenced in the 2022 Islands Trust Governance Review.

**Why is build-out data needed?** Many islands are considering adopting zoning bylaws that ~~will~~ could allow significantly more people to live on each island than are allowed now. Good planning anywhere requires a clear understanding of how many residents you have already planned for, before expanding those plans further. This especially important on islands with limited water supplies and services.

A build-out analysis would give us hard data from which to plan for worker housing, necessary services such as health care. Decisions should be made with consideration and knowledge of the entirety of the development picture on our islands. This is good planning.

**Friends of the Gulf Islands Society**  
**Growth Limits Assessment for the Islands Trust Area**  
**British Columbia, Canada**  
**November 17, 2025**

### **Introduction**

Islands Trust is a unique “public trust” created by the British Columbia legislature in 1974 to stop unrestrained development and preserve the natural environment, rural character and unique amenities of these islands for all British Columbians. It was recognized then that development would need to be controlled in order to achieve these goals. Now, these islands are faced with unprecedented growth pressures and calls to increase the number of residences allowed. Before this is done, it is essential that it be determined how many residents and visitors the islands can sustain without compromising the values that the Trust was created to protect.

### **The Need is Critical**

A 2019 Islands Trust report, [\*State of the Islands Indicator Project: Final Report\*](#) indicates (on page 19) that natural areas converted to human use had already surpassed the accepted threshold for ecosystem health on one island and were nearing this threshold for two other islands.

Population and development have only increased in the years since. Between 2016 and 2021, the Islands Trust Area experienced its most rapid period of population growth on record. According to Statistics Canada, the total population rose from 26,218 to 30,512, representing a 27.0% increase over five years—significantly higher than British Columbia’s overall growth of 7.6% and Canada’s 5.2% during the same period. See [Population Growth in the Islands Trust Area 2011-2021](#) report.

This is why we are urging Islands Trust to determine the growth limits appropriate to each Trust Area as soon as possible.

### **Why Growth Limits?**

An argument is being circulated that the number of residences, and hence residents, is irrelevant. To quote Trust Vice-Chair Toby Elliott: “the real issue is not how many people live here, but how we live here”. The argument goes that limiting the population doesn’t necessarily protect ecosystems; that dispersed housing and big houses can cause more damage than carefully clustered, small homes.

We wish this optimistic evaluation was true but it is not. All development harms the natural environment. The question is how much development, where it goes and what type of development is compatible with preserving the natural environment of the Trust islands. Several small homes can destroy more natural vegetation than a one large house depending on the number and size of the “small homes” and the size of the supposedly large home it is compared to. We are however, in support of bylaws limiting the size of houses on the islands. An inquiry on Salt Spring revealed that most new homes being built were of modest size.

Given that supplies of freshwater from Vancouver Island may eventually be limited, each island should at least be self-sufficient in water. However, significant amounts of water are now being trucked to Gabriola, Galiano, the Penders, Mayne and Saturna islands. This is a warning sign that islands are exceeding their ability to support their current population.

### **The number of residents is critical because:**

- Although zoning for one house on a lot does not control the number of residents living there, according to the 2021 census data, most homes are occupied by 2 or less people.
- Each person uses about the same amount of water and produces about the same amount of sewage regardless of how large or small their house is.

- Small homes clustered in a small area, even if very water conserving, can use enough groundwater in that particular area that the production of wells of nearby residents can be reduced.
- More people place more pressure on all island services including ferries, schools, roads and health facilities.
- Dispersed new development will increase the number of cars and fuel used, ignoring the need to reduce Greenhouse gases. The Islands Trust declared a “Climate Emergency” in 2019.

### **Pressure on the Natural Environment**

It is obvious that development harms the natural environment because it removes vegetation and uses more resources. Fragmenting the forest canopy diminishes the recharge to groundwater that supplies water to streams, wetlands and lakes especially during the dry months.

Development has less impact on the natural environment if it is located near the main road, rather than into the forest. Building near the road renders homes more resistant to fire.

Pressure of development on the natural environment can be measured by the “Pressure-State-Response framework” developed by the Environmental Secretariat of the Organization for Economic Cooperation and Development (OECD). In this framework, which is based on ecosystem and watershed mapping, “pressure” refers to the constellation of human activity that places stress on ecosystems; “state” refers to the condition of ecosystems as a consequence of pressure from human activity and “response” relates to the policies and other actions that are taken to mitigate environmental damage – e.g. through regulations, laws, moral suasion, monetary and fiscal policy, etc. ([Rapport, David, “An Ecosystem Health Perspective relevant to Salt Spring Island’s OCP Review”, February 27, 2007 p 4\).](#))

### **Build-out Numbers are Essential**

A critical step in determining growth limits is to estimate the population that would result if all properties were developed to their current zoning potential (build-out). Zoning is the primary tool used to plan for island development. It is foolhardy to zone for more population than the island can support on the assumption that it may never be developed. Zoning should reflect a reasonable estimate of an appropriate development level.

### **What Parameters should be Measured to Determine Growth Limits?**

The islands cannot sustain themselves with food or fuel, just as the province of BC is not self-sufficient in either. But, each island should have a clear understanding of how much of, and where, the natural environment must be protected and what size of human population can be supported without adversely impacting healthy ecosystems, while keeping the islands as liveable and affordable as possible. A study for each island should include the following:

- **Ecosystem health** - A comprehensive determination of the current health of island ecosystems by measuring specific indicators such as species diversity, stresses from human activities, effects of invasive species, contiguous forest cover, fresh and marine water quality. A potential method is described by David J. Rapport’s in “*An Ecosystem Health Perspective relevant to Salt Spring Island’s OCP Review*”.
- **Freshwater availability** –A determination of the amount of fresh water that is available for human use without compromising water needed for the natural environment. Groundwater not only supplies wells for human use; some of its other essential uses are nourishing our forest and other vegetation, providing water for terrestrial and marine wildlife, and maintaining creeks through the dry season. This information is likely already available through the Islands Trust Freshwater Sustainability Project. If not, it should be.

Importing water is not a substitute because the expense increases the cost to live on the islands, and other off-island and on-island commercial water sources may not be available forever.

Rainwater collection, while useful for garden and farming during the summer, cannot fully replace well or surface water for household use several reasons: A very large amount is needed to sustain a family through our long dry season. Systems needed to ensure rainwater is safe to use for potable water are expensive and need detailed maintenance. Both of these factors will increase the cost of living on the islands, making the islands less not more affordable. Additionally, as long as the property qualifies for a well, there does not appear to be a way to require that rainwater collection systems be used instead of well water.

Desalination is problematic because it is costly and uses a large amount of electricity, something to be reduced to fight climate change. It also produces a salt byproduct that, when released to the sea, can harm native ecosystems.

- **Waste absorption capacity** – The amount of waste from on-site septic systems that can be successfully treated without polluting ecosystems and domestic wells should be determined. Studies have shown that onsite household septic treatment plants do not necessarily remove a variety of contaminants (including pharmaceuticals) that can be carried into groundwater and into the ocean where they can harm marine ecosystems. This is concerning given the demand for high density of housing adjacent to the coast on some islands.
- **Services and infrastructure** – An estimate should be made of the resident population and visitors that can be supported by services and current infrastructure such as housing, ferry service, health care, roads and schools. Some islands are reporting several hours of wait time to catch a ferry in the summer months or the inability to get required reservations for days. At some point, this will become too burdensome on residents and will discourage visitors on whom many island businesses and economies rely. It is already very difficult to recruit healthcare workers for the islands and it is more expensive to maintain island roads than elsewhere.

### **Facing the Challenge**

We have been told that determining limits to growth is “too difficult”. We say that it is complex, but it can and must be done. We suspect that one challenge is that the resulting information may indicate that elected officials should make decisions that will displease some. Some property owners who want to increase the development potential of their property may not be able to do so. It is hard to say “no”. But in the end, if we don’t acknowledge these limits, current and future residents, visitors and our natural ecosystems will suffer and the very values that Islands Trust was created to protect could be lost.

### **Conclusion: Plan for Limits, Plan for the Future**

We have suggested some elements of determining growth limits with the recognition that the result will always be an estimate. But a well-informed estimate is better than none at all. We welcome further suggestions about other parameters that should be measured. The use of technology has allowed humans to override the limits of their immediate environment and resources, i.e. natural limits. But this comes at a cost. Overuse is difficult to measure until those resources are gone. It is crucial therefore, and in everyone’s interest, to implement the precautionary principle and err on the side of caution.

For the sake of current and future generations – and the natural world we all depend on – it’s time to act.