

Water and the draft Official Community Plan

Dear Mayor and Council,

Every municipal water system on Bowen is on Stage 3 restrictions. The Municipality's Water Conservation page states, today: *"All water systems are currently on Stage 3 Water Use Restrictions."* It lists all seven. Lawn watering is prohibited. Well owners are asked to follow the stages too, *"as doing so supports the long-term sustainability of local groundwater sources"*, and the page offers them tips on dealing with a dry well. The same page says: *"Bowen Island's water comes from rainfall collected in the aquifers and water sheds. We do not have a unlimited [sic] amount of water."*

Bowen has 42 water systems. Seven are municipal and carry about four fifths of all connections. Five of the seven draw on groundwater. The other 35 are private or community systems, most of them wells. Beyond all of them are households on single private wells. A well serving one home falls outside the Drinking Water Protection Act, so nobody permits, inspects or oversees that water.

That is the island this plan is for. The plan does not treat it that way.

This letter is written against the draft plan published in May 2026, and the 66 recommended policy changes in Attachment 8 of the report for this meeting, together with the map amendments in Attachment 9. No document combining the two exists. Changes are referred to below by their item number.

The water question was left out at the start

The consultant's Gap Analysis and Legislative Review, dated 19 November 2024, set the roadmap. It checked the current plan against the Local Government Act for housing. It did not review the provincial water statutes. The words groundwater, aquifer and water do not appear in its findings.

The Baseline Findings Report of February 2025 assessed the piped municipal systems one by one. Its Infrastructure Review Technical Memorandum of 21 February 2025 gives the households on private wells and surface water two sentences. It records that Vancouver Coastal Health had assessed private systems, and that those assessments *"were not reviewed"*. Assessments of water treatment on the municipal systems *"were not reviewed"* either.

Where the studies did look, they found trouble. Of the water supply studies the baseline reviewed, two found supply insufficient for existing demand and four found it sufficient. Among the findings it records: at Tunstall Bay, four of the seven wells were in an *"operationally unsustainable"* condition [sic]; at Bluewater Park, water supply recharge was *"approximately 7% less than current demands"* and about 43 per cent less than future demands. The baseline says groundwater, aquifer and lake level monitoring *"will be needed to understand long-term trends"*.

That monitoring was not done. The Municipality's Grafton Lake Watershed Management Plan excludes it. Addendum 1 to its request for proposals, October 2025, states: *"groundwater monitoring is beyond the scope of this study"*.

So the plan rests on work that set groundwater aside. No groundwater work has been commissioned since.

Fifty years of land use decisions here were built on water

Land use planning on Bowen has never been separable from water.

The Islands Trust was created in 1974 to preserve and protect these islands. Its Policy Statement directs island municipalities to address freshwater quantity and in-stream uses in their plans and bylaws. The plan adopted in 1982 set a four hectare floor in the Rural designation, discussed what the island could carry, and listed a groundwater supply study among studies it called *"necessary and should be done in the near future"*. That study has still not been done. Subdivision approvals in the 1980s were given on condition of covenants capping how many lots could ever be created. The current plan directs clustering *"in the least environmentally sensitive areas"* to protect significant watersheds, and requires a groundwater professional's report where a use needs more water than one home. The Watershed, Aquifer and Streamside Protection development permit area, adopted in 2011, has been applied about a hundred times in five years, by far the most applied for of the Municipality's permit areas.

Imperfect as it is, that record is why the parcel sizes, the covenants and the permit areas exist. It is the only account of why this island's rules take the form they do.

The review was advised to cut that history back. The Gap Analysis recommends reducing *"the amount of history provided at start of each section as there are other sources of historic information widely available and an OCP is not intended to provide historic perspectives, instead its primary function is the regulation of land use and development"*.

The reasons behind these rules are not held anywhere else. The 1982 plan, the covenants and the permit records are in the Municipality's own files. And here the history is not background to the regulation. It is the reason for it.

The draft keeps a page of history in *"We Are Bowen"*: the Squamish village, the arrival of Europeans, logging and mining, the steamship era, the parks. There is no water in it.

The working knowledge sits in the Municipality too. The hundred permits issued under that development permit area covered tree clearing, roadwork, driveway access, onsite works, septic upgrades, tank installations, new houses and subdivision. Each was a decision about ground that feeds a well or a creek. Behind them sit the subdivision conditions, the covenants, and the servicing bylaw requiring a professional's certification on groundwater supply, and on effect on existing wells, before a community water system is expanded.

A plan written from that record would say how this island differs. That ground disturbance and tree loss change what reaches a wetland or a creek, and how much rain soaks in rather than running off. That steep ground and thin soils over rock shed water instead of storing it. That a septic field on a slope does not behave like one on level ground. That in fractured bedrock, water and what it carries travel along fractures nobody has mapped, so one well can be affected by something far off and its neighbour not at all.

None of that is in the draft.

The Municipality already acts on this knowledge, elsewhere

The Municipality adopted Water Conservation Bylaw No. 695, 2025 on 9 March 2026, with restrictions from 1 May to 31 October. It publishes what residents may not do with water, and what well owners should do when a well fails. It moved land out of Neighbourhood Residential on the map because those areas are *"not on Municipal or Utility water systems"*.

So the Municipality treats water as a limit when it manages demand, and when it draws lines on the map. It does not treat water as a limit when it writes the policies that decide how much building the land will carry.

That bylaw reaches only the municipal systems. Households on private wells and small private systems are asked to conserve voluntarily. The Province licenses water use, but does not decide what is built above an aquifer. The health authority permits drinking water systems, and does not confirm quantity. So for those households the Official Community Plan and the Land Use Bylaw are the only protection, and this plan sets what the Land Use Bylaw may say.

Joining a municipal system does not secure a supply either. The Municipality's application for a water service connection, revised 22 September 2025, requires the applicant to initial this line: *"The Municipality cannot guarantee pressure or quantity at our water service."*

The public raised water, and it was set aside

The Round Two survey asked residents how far they agreed with twenty-one statements about the draft. They covered the vision, the guiding principles, ecological corridors, a tree bylaw, housing forms, tourism, paths and road shoulders, pay parking, accessibility, heritage, land use

designations, neighbourhood commercial uses, a wildfire development permit area, and one on water: a development permit area that would require new development to collect rainwater. Nothing asked about water supply, wells, aquifers, or whether the island can carry more demand.

People raised it anyway. Water supply appears in all eight open comment questions. No question invited them to. Of the 1,796 comments published with the report, 111 raise water supply. Every one of those was read: 107 express concern or ask for stronger protection, four are unclear or object to the cost of water measures, and none says supply is adequate. In the housing question, 35 comments raise water supply and 23 raise affordability.

The notes from the in-person events say the same. Under Environmental: *"Concerns about water supply - long term", "aquifer capacity/sufficient data to assess supply for private systems", "island capacity (water esp.)", "every system constrained", "How to support densification when water source is limited?"*

The consultant's own tally of the emails puts *"does not offer enough environmental protections, or water source protections"* at the joint top of the list. Its memorandum of 29 July 2026 then says:

"No further changes are recommended as a result of the email submissions given high levels of public support attained through the online survey and at in-person events."

The *"high levels of public support"* are the agreement scores from those twenty-one statements. Most of them have nothing to do with water. The one that does asked about rainwater collection, and it drew the highest agreement in the survey. That shows residents supported a water measure when one was put to them. None was put to them about supply. None of them asked whether the plan deals adequately with water supply, so none of them can show that it does. Agreement with what the plan proposes is not an answer to a concern the plan was not asked about. The What We Heard Report then gives no water supply theme, and no count for any theme, so the weight of what people said about it cannot be seen.

So a concern raised throughout the survey, at the events and in the letters was measured by questions that could not record it, and then set aside on the strength of the score those questions produced.

What the plan will say about water

The draft already contains a clear rule. Policy 2.2.68: *"Do not permit land use and associated water demands when not supportable by a sustainable water supply."* An objective in the same section, which the draft labels 2.2.Y, states that all water supplies are *"operated within their sustainable yield limits"*.

Nothing says how that is tested, by whom, or on what evidence. No amendment before the Committee touches it.

The one water change, item 1, is to policy 2.1.6, which would *"Require lots to prove an annual sustaining yield of potable water supply, that does not compromise existing [sic] water users, prior to a building permit being issued or a rezoning application being approved."*

The aim is right. As written it does nothing.

- *"Annual sustaining yield", "compromise" and "existing water users"* are not defined.
- Nobody is named to assess it and no standard is set. The qualified professional's report that would answer the question sits in the same plan at policy 2.3.5, where it *"may be required"*.
- It applies at building permit and rezoning only. Not at subdivision, and not to a permitted use that grows.
- It asks whether one more lot would compromise existing users, when every municipal system is already restricted.
- It is annual. Bowen's shortages come in summer.

The fourth point has no answer in the plan. If existing users are already restricted, either no new lot can meet the test, or *"compromise"* is read so loosely that it never bites. The plan does not say which.

The plan also assumes something that is not settled. Where it touches water, it relies on a report by a qualified professional, and nowhere provides for that report to be reviewed or measured against a municipal standard. A report filed becomes a question answered.

That assumption was put to the Legislature in 2025, as Bill M216, the Professional Reliance Act, which would have required local governments to accept certified submissions without peer review. Local governments opposed it, including five whose letters came to this Council in December 2025 and January 2026. So did the professions. All six regulators under the Professional Governance Act told the committee the bill was unworkable as drafted, raising liability transfer, scope of practice and public safety. The sponsor asked the committee to end consideration in April 2026. This plan would do, by default, what that bill would have required: a certified report accepted without review.

An adequate plan for a place this complicated does not let one professional's report stand as the answer.

Density is added where the water is least known

Water supply is the stated reason for several of the map changes. Parcels are moved out of Neighbourhood Residential because they are *"not on Municipal or Utility water systems"*, or to limit subdivision of *"undeveloped lots not within water systems"*. Most of that land moves into

Rural Residential Transition, where up to sixteen units are now allowed. So the absence of a water system is the reason for moving that land, and the designation it moves into asks nothing about water.

Rural Residential Transition covers large areas outside the municipal systems, on small private systems and private wells. Item 58 allows clustered neighbourhoods there of four units per hectare, up to sixteen units, on lots of one hectare or more. The water test is whether the site can be serviced *"to the satisfaction of the applicable approval authorities"*. Writing to the Municipality on the rezoning application at 1355 Westside Road, Vancouver Coastal Health said it *"does not regulate or confirm adequate quantity of ground or surface water"*.

The growth strategy has the same gap. The plan records a need for 1,393 units over twenty years and answers it with infill. Its stated reason is that these housing forms make *"efficient use of serviced land"* and capitalise on *"infrastructure efficiencies"*. The only qualifier on the infill policy is *"servicing and infrastructure capacity"*. But most land here is not serviced. There is no sewer outside Snug Cove, and outside the seven municipal systems there are small private systems and wells. Land with no pipes has no servicing capacity to measure, so that qualifier does not reach it. And the plan does direct growth onto that land, through the clustered neighbourhoods it now allows in Rural Residential Transition.

Density has been decided here one lot at a time before, with water never asked about. In June 2022, under Bylaw No. 581, the Municipality permitted detached secondary suites on every residential property, removing the minimum lot size. On referral to the Islands Trust its position was that this did not increase intensity or density. Trust staff concurred, and the freshwater directives of the Islands Trust Policy Statement, 4.4.2 on the quantity and quality of supply and 4.4.3 on in-stream uses, were recorded as not applicable. So nothing was asked about water. In November 2024 the same measure appears in the Municipality's Interim Housing Needs Report as one of the actions by which 1,393 units will be accommodated. The first document counts one lot at a time. The second counts the island. Neither asks what those lots are served by.

The aquifer receives the total. A well is not affected by how the homes above it were permitted, whether as suites, pocket neighbourhoods, infill or new lots. It is affected by how many there are and how much they draw. The Official Community Plan is the only instrument that sees the whole island at once, and the only one every later bylaw must be consistent with. If the total is not held here, nothing downstream will hold it.

Directive policy 4.4.2 of the Islands Trust Policy Statement, which this plan must satisfy before the Executive Committee approves it, requires island municipalities to address measures ensuring that neither the density nor the intensity of land use is increased in areas known to have a problem with the quality or quantity of freshwater, and that existing, anticipated and seasonal demands for water are considered and allowed for.

So three things have to be accounted for before the plan is settled. Where the 1,393 units are expected to go. How many of those lots sit within a municipal water system. And for the rest, what supplies them, and whether the aquifer can carry it.

Nobody is named, and no statute is named

The draft does not mention the Water Sustainability Act, the Drinking Water Protection Act, the Environmental Management Act or the Riparian Areas Protection Regulation anywhere. Where responsibility for water appears, it is unattributed. Water and septic for clustered housing go to *"the applicable approval authorities"*. Wetlands and recharge areas go to *"the provincial regulator responsible for the environment"*. Home-based businesses must meet *"applicable provincial public health legislation"*. At building permit stage the Building Bylaw leaves the water supply decision to *"the Municipal engineer"*, a role no bylaw defines. One amendment, item 21, does name a body. It replaces Vancouver Coastal Health with the BC Ministry of Environment for effluent at garbage handling sites. It does not name the statute that gives the Ministry that power.

So a reader cannot tell, from the plan that governs land use here, who protects this island's water or under what law. The plan does not work out where its own responsibility begins and ends, and does not say what it can require.

That matters most on density, because density is the one thing nobody else decides. Neither the Province nor the health authority decides how many homes may be built on a hectare of land over a fractured bedrock aquifer. Only the Municipality decides that, through this plan and the bylaws that must follow it.

The Province says as much in its own groundwater records. It defines aquifer vulnerability as *"the susceptibility of an aquifer to contamination from surface sources"*, and states that vulnerability *"is based on hydrogeology alone and does not consider the existing type of land use or nature of the potential contaminants"*. The provincial rating says how exposed the aquifer is. What sits on top of it is a land use decision, made here.

Nature and drinking water are one system here

The Islands Trust's Senior Freshwater Specialist told Council in December 2023 that all of Bowen's groundwater comes from rain, snow and fog, that ecosystems play a part in recharge, and that protecting critical recharge areas was the first of his next steps. On an island with no imported water, rain becomes well water by passing through forest, soil and wetland. Wetlands hold water on the land instead of letting it run off steep ground to the sea. A policy about wetlands is a policy about drinking water.

The draft keeps the two apart. Its ecological policies cover corridors, tree canopy, biodiversity and parks. Its water policies cover systems, servicing and conservation. The one policy that treats

them together, 2.2.84(b), asks the provincial regulator to *"discourage the disturbance of wetlands and critical groundwater recharge areas"*. That policy asks the Province to act, so a soft verb there is at least consistent. The difficulty is elsewhere: the plan says nothing about what the Municipality itself will do to protect recharge areas on the land it regulates.

Two recharge changes the consultant itself recommended, in its memorandum of 29 July 2026, are not before the Committee. On policy 2.2.4, it recommended adding *"groundwater recharge areas"* to the areas given priority for protection; item 12 of the recommended changes rewrites that policy and leaves them out. On policy 2.2.63, which reads in full *"Develop protections for freshwater-recharge areas"*, it recommended adding *"by mapping groundwater recharge areas and creating a Development Permit Area for this purpose"*; that policy is not amended at all. The memorandum is in the package for this meeting. Neither recommendation appears in the 66 recommended changes, and nothing in the package explains why. The word recharge appears nowhere in them.

The plan's forward commitment on water is policy 2.2.61, *"Complete a Water Master Plan and update municipal water supply systems, as needed, to store and deliver fire-flows to current standards"*, which item 15 would extend to *"green infrastructure assets such as wetlands and stream riparian corridors"*. On its own wording that plan covers the municipal systems and fire flows. A Water Master Plan first appears in municipal documents in October 2025, and exists now as a single budget line of \$200,000 for 2026, with nothing in the four years after. It does not answer the questions in this letter about how much water this island has, or what protects it. There is more to say about it, and it will be said separately.

The staff report for this meeting states: *"There are no ecological, environmental, or climate considerations as a direct result of this report."* The changes before the Committee include the water supply test, clustered housing on land served by wells, and the designation of land across the island. The report says the ecological discussion will come with the report at first reading, after these decisions are made.

The Steering Committee's own chair says the policies will not do anything

At the Steering Committee meeting of 10 September 2026, while these changes were being worked through, the committee's chair said:

"this is a small municipality with a limited staff and all these policies that will do nothing but sit here as policies. So we're really giving lip service to a lot of things that are all very honourable things to give lip service to, but they're not going to affect land use in any any substantive way."

He went on: *"So I just be cautious about making, adding more and more policies that will really not give you any guidance or give the municipality any guidance as we look to future development."*

Nobody disagreed.

The diagnosis is sound. A policy that requires nothing does sit there and guide nobody. The conclusion drawn from it was to add fewer policies, which leaves the plan exactly as described.

There is no other moment for this. A new Official Community Plan is the one occasion when a community stops, looks at the whole island at once, and decides what it will and will not allow for the next twenty years. It happens roughly every ten or fifteen years. Between times, decisions are made one application at a time, against whatever the plan already says.

So the work of making a policy mean something can only be done now. That work is detailed. It means taking a policy, asking what it would actually require, of whom, at what point in a process, on what evidence, and with what consequence if the answer is no. It means following it through to the development permit area, the bylaw and the permit counter, and checking that something happens there. Nothing else in the cycle does that.

That is what the last two years were for. This is what the 21st is for.

The committee itself had already worked out how to do it. In May 2026, after Council reviewed the draft, the committee agreed that an edit for consistency was a priority, and that the plan should carry an appendix explaining its word choices. Its rule was that *"activities under BIM purview"* would use *"must"* or *"shall"*, and activities controlled by others would use *"encourage"* or *"allow"*.

That appendix has not been produced, and the rule has not been applied. In the draft, *"must"* appears six times, most of them describing what the Local Government Act requires of a plan, and *"shall"* ten times. *"Support"* appears 220 times, *"encourage"* 75 and *"consider"* 59.

The words are not decoration. Under section 478 of the Local Government Act, every bylaw adopted after this plan must be consistent with it, and the plan must be approved by the Islands Trust Executive Committee against its Policy Statement. A policy that requires nothing cannot constrain a rezoning. A policy that requires something can.

The answer to policies that do nothing is not fewer policies. It is to write the ones that matter so they require something. Water comes first.

Definitions

The plan will permit agriculture, hobby farms and agricultural processing in the Rural Residential and Rural Residential Transition designations, which cover most of the island. Item 55 adds all three to Rural Residential Transition. None of the three is defined in a way that limits anything. Agricultural processing would be defined as *"The use of agricultural land for storing, packing, preparing and processing farm products produced primarily on that lot."* *"Primarily"* is not a number. *"Farm products"* is not defined. *"Agricultural land"* means land in the Agricultural Land Reserve, which most land in those two designations is not. Agriculture itself is not defined in the plan at all.

These terms decide what may be built and operated above the island's aquifers, so they belong with the water question. The definitions are a larger subject than this letter, and will be addressed separately.

What is not yet settled

My letter to Mayor and Council of 15 September 2026 set out that no draft of the amended plan exists, that a second draft was promised twice in writing, in the Steering Committee minutes of 14 July 2026 and in the What We Heard Report, and that neither the public nor the Steering Committee has seen the text. Nothing in this letter is put forward as a way of advancing the plan without a published draft. The plan should be prepared and published so that everyone can read it, and what follows applies whenever it is considered.

The water policies and the designation changes should not be recommended for a bylaw on 21 September. That means at least these items of Attachment 8: item 1, the water supply test at policy 2.1.6; item 12, the conservation policy at 2.2.4; items 55 and 58, the uses and pocket neighbourhoods in Rural Residential Transition; item 61, the pocket neighbourhood limit in Neighbourhood Residential; and item 66, the definition of agricultural processing. It also means the changes to the land use map in Attachment 9 that move land into Rural Residential Transition.

These are the things that have to be settled before this plan goes to first reading.

1. Complete the groundwater work the baseline set aside: an assessment of what the island's aquifers can supply, and of how much of that is already committed.
2. Set out where the 1,393 units are expected to go, how many of those lots sit within a municipal water system, what supplies the rest, and whether the aquifers can carry it.
3. Give policy 2.2.68 a test: who assesses whether a water supply is sustainable, to what standard, and at what point in the process.
4. Revise policy 2.1.6 to require a report by a qualified groundwater professional, apply at every stage where demand is added, including subdivision, and account for summer conditions.
5. Provide for the Municipality to review a professional's report against a stated standard, rather than accepting it as the answer.
6. Map groundwater recharge areas and protect them through a development permit area, and add them to the priorities for protection in policy 2.2.4, as the consultant recommended in its memorandum of 29 July 2026.
7. Define agriculture and agricultural processing, with a measured limit, before item 55 adds agricultural processing to a second designation.

8. Produce the appendix on word choice that the Steering Committee agreed in May 2026, using *"must"* or *"shall"* where the Municipality controls the outcome.
9. State who is responsible for what, and under which law: the Province for water licensing and allocation under the Water Sustainability Act; Vancouver Coastal Health for registered drinking water systems under the Drinking Water Protection Act; the Ministry of Environment for waste discharge under the Environmental Management Act; and the Municipality for land use, development permit areas and the conditions it places on particular uses. Where a policy relies on an approval authority, name it.
10. Report plainly what the engagement showed about water, with the comments counted rather than summarised away.
11. Bring the ecological assessment of the plan forward, so that it informs these decisions rather than following them.

Water decides what this island can carry. A plan that will govern land use for a generation should be built on it. This one is not, and the people who said so were counted as satisfied.

Yours sincerely,

Heather Miller

SOURCES

Municipal documents

- Draft Official Community Plan, May 2026.
- Official Community Plan Update, report to the Committee of the Whole, 21 September 2026, with Attachment 8, recommended policy changes, and Attachment 9, land use map amendments.
- Official Community Plan, Bylaw No. 282, 2010, consolidated April 2023.
- Official Community Plan, Bylaw No. 14, dated March 1981 and adopted 1 May 1982.
- Water Conservation Bylaw No. 695, 2025, adopted 9 March 2026, and the Municipality's Water Conservation page, read 18 September 2026.
- Application for Water-Service Connection, Municipal Water System, revised 22 September 2025.
- Building Bylaw No. 489, 2019, sections 10.1 and 10.52.
- Subdivision and Development Servicing Bylaw No. 447, 2017, Schedule A.
- Section 215 covenants registered on subdivision of Blocks C and D, District Lot 492, 1986.
- Interim Housing Needs Report, November 2024.
- Land Use Bylaw amendment Bylaw No. 581, 2022, permitting detached secondary suites.
- Letter to Mayor and Council, 15 September 2026, on the absence of a draft.
- Grafton Lake Watershed Management Plan, request for proposals, Addendum 1, October 2025.
- Five-Year Financial Plan 2026-2030, Water Master Plan budget line.

Consultant documents

- Assessment of OCP Accomplishments, Gap Analysis and Legislative Review, 19 November 2024.
- Baseline Findings Report, February 2025, with the Infrastructure Review Technical Memorandum, 21 February 2025, and the Development Permit Analysis.
- OCP Recommended Changes Technical Memo, 29 July 2026, which carries the recharge recommendations for policies 2.2.4 and 2.2.63 and the tally of email submissions.
- Phase 2 Engagement What We Heard Report, July 2026.

Engagement records

- Survey responses published as Attachment 3 to the report for this meeting, 1,796 open comments.
- Engagement event feedback, listed as Attachment 6 to that report and published with the Steering Committee agenda of 10 September 2026.

Meeting records

- Official Community Plan Steering Committee, minutes of 14 May 2026 and 14 July 2026, and the recording of the meeting of 10 September 2026.
- Council, recording of 11 May 2026.
- Council agenda of 11 December 2023, item 3.1, Islands Trust Groundwater Sustainability Science Program presentation.
- Council agendas of 8 December 2025 and 26 January 2026, correspondence from Port Moody, Pitt Meadows, View Royal, Valemount and Highlands on Bill M216.

Islands Trust

- Islands Trust Policy Statement, directive policies 4.4.2 and 4.4.3.
- Referral of Bylaw No. 581, 2022, and the Municipality's response on intensity and density.

Provincial

- Local Government Act, section 478.
- Groundwater Wells and Aquifers, aquifer records and field definitions, read 17 September 2026.
- Bill M216, Professional Reliance Act, 2025, with the submissions of the Union of BC Municipalities and of the regulators under the Professional Governance Act.

Health authority

- Vancouver Coastal Health, response to the Municipality on rezoning application at 1355 Westside Road.