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Guidance for Filling Out the Islands Trust Draft Policy Statement Survey

The Islands Trust is circulating a survey on their draft Trust Policy Statement. The Trust Policy Statement (TSP) is important because it regulates what Local Trust Committees must do and what they cannot do to protect the Trust islands. It is the “guiding document required by provincial legislation”, the Islands Trust Act, “that sets out the principles and policy framework for planning and land use management within the lands and waters of the Islands Trust Area”. (‘Share Your Views on the Islands Trust Policy Statement’ brochure)

The draft (TPS) under review is considerably weaker than the current one and lacks measurable or enforceable goals. It has green-sounding goals but lacks required actions to protect the natural environment by limiting the rate and scale of development as expressed in the mandate of the Islands Trust Act. There are no requirements or policies to establish how much growth can be accommodated on the finite land base and with the resources of each island, essential to fulfilling the mandate. This guide highlights key points for filling out the survey from the perspective of supporting the mandate and limiting further adverse impacts.

Some trustees do not favour “prioritizing” strong environmental protections and we are concerned that this emphasis may be removed later. We hope that public objections will result in this document being strengthened and that the Minister of Housing and Municipal Affairs will not approve a weak TPS. We are asking you to express your concerns. Your voice matters.

Background - The TPS has Advisory Policies **and** Directive Policies.

Directives are the policies that form the basis for islands’ official community plans and bylaws. But the draft TPS says they “**should** be addressed, where possible”. **Directives must be mandatory and enforced through land use bylaws** for there to be real protection.

How to Approach the Survey

- The survey groups together many policies, giving little opportunity to distinguish between those that are OK and those that are not. If a section contains weak or missing policies, we recommend marking “Strongly Disagree.”
- Each section has a place for comments at the end of the section. Use **Comment boxes** to call for stronger, enforceable protections.

Core Concerns

- Define “environment” as the “natural environment.”
- Add measurable ecological targets tied to carrying capacity.
- Make Directive policies mandatory, not optional.
- Strengthen freshwater, forest and climate change protections.

Key Sections to Oppose

- **Guiding Principles** – precautionary principle and cumulative effects must be Directives, not just Principles.
- **Ecosystem Integrity** – restore protections for forests, wetlands, riparian and marine ecosystems.
- **Growth & Housing** – limit rezoning for more residential density to affordable housing within the confines of the environment and its resources.
- **Freshwater** – stronger bylaws needed to protect freshwater recharge-areas; current safeguards are inadequate.
- **Transportation** – restore policy in current TPS: no bridges or tunnels connecting islands to the mainland or each other.

Recommendation for final survey question: Strongly Disagree – the draft TPS is not effective as written.

👉 The survey is here:

https://singuser98e5cae1.co1.qualtrics.com/jfe/form/SV_881YFvDwrsd2p4G

Deadline to complete the survey – February 2, 2026

Section-by-Section Guidance

Guiding Principles

Recommendation: Disagree or Strongly Disagree

Suggested comments to add in the “Other Comments” box at the end of each section

- The word “environment” must be defined as “natural environment” (not including built structures).
- Make it a **priority** to preserve and protect natural ecosystems on the Trust islands.
- The precautionary principle and consideration of cumulative effects should be a Directive.
- Guiding Principle 2.1.3 (Limit the Rate and Scale of Development) should be a Directive.

Reconciliation Principles

Cooperation Principles

Goal 1 – Advance Reconciliation; Goal 2 – Preserve and Protect Indigenous Cultural Heritage and Significant Areas, Sites and Species

- Friends of the Gulf islands supports the ongoing consultation with First Nations on the TPS and agree this is vital in ensuring the mandate of the Islands Trust is effectively advanced.

Goal 3 – Preserve & Protect Healthy and Biodiverse Ecosystems

Ecosystem Integrity

Recommendation: Disagree or Strongly Disagree

Suggested comments:

- Consideration of the precautionary principle and cumulative effects must be Directives.
- The word “**prioritize**” must remain in Directives to uphold the “preserve and protect” mandate.
- Under Directives, list relevant ecosystems as in the current TPS (forest types: Coastal Douglas Fir (CDF), Western red cedar, Western hemlock, Garry oak, etc.).

- Directive 3.3.3 refers to “the preservation, protection and restoration of **unfragmented forests** but there is no definition of “un-fragmented forest”. All forest ecosystems should be preserved and protected.
- Include protection of wetland and riparian areas and **all types of marine ecosystems**.
- State that natural ecosystems of all types should be protected against further degradation and adverse impacts of growth/development/land use, as in the current TPS.

Goal 4 – Fostering Sustainable, Inclusive and Resilient Communities

Background: The title “managing” growth reveals the intention of these policies to allow for all types of growth that may not be in keeping with the islands’ environmental capacity and rural character. The housing section allows density increases for “attainable” housing but “attainable” is not defined. Zoning by floor area covered could allow for many small residences or “tiny home villages” on single-residence lots, stressing freshwater and septic capacities and resulting in more forest loss.

Managing Growth and Development

Recommendation: Strongly Disagree

Suggested comments:

- Retitle this section “Limiting Growth and Development.” Replace “growth management” with “limiting growth” throughout this section.
- The Islands Trust declared a **Climate Emergency** in 2019; yet only Directives 3.4.5 and 3.4.6 reference climate-change and do so very generally. More specific mitigation Directives are needed.

Housing

Recommendation: Strongly Disagree

Suggested comments:

- Rezoning for density increases should only be for **affordable housing** within the confines of the environment and its resources. If “attainable” housing means middle-class affordable housing, it should be defined as such in the TPS Glossary.
- Omit Directive on Floor Area Lot Coverage (3.4.14) which could be used to allow for multiple residences on a single family lot. Instead, add a Directive limiting house size as appropriate for each island.

Transportation

Recommendation: Disagree

Suggested comments:

- Restore current policy 5.3.2: “...no island in the Trust Area should be connected to Vancouver Island, the mainland, or another island by bridge or tunnel notwithstanding the existing bridge between North and South Pender Islands.”

Waste, Emissions and Pollutants

Recommendation: Disagree

Suggested comments:

- Restore current policy 5.4.2: “Neither hazardous nor industrial waste should be disposed of in the Trust Area.”

Recreation - No suggested comments.

Goal 5 – Foster Sustainable Stewardship of Lands and Waters

Freshwater

Recommendation: Disagree or Strongly Disagree

Background: This section needs stronger Directives given the precarious water resources on all islands due to impact by development and climate change. Many islands already rely on imported water. Draft fails to adequately protect ground/surface water through forest and recharge-area protection.

Suggested comments:

- Add a Directive to protect water by protecting recharge areas, forests and native ecosystems via zoning/development permits.
- Recognize that many islands are not self-sufficient in water; density/zoning increases must be limited.
- Advisory Policy, 3.5.6 Freshwater Uses should be a Directive to ensure that water quality is maintained and use is not to the detriment of habitat needs, Indigenous cultural and spiritual uses, and aesthetic and recreational uses.

Forest Lands and Wildfire Risk

Recommendation: Disagree or Strongly Disagree

Suggested comments: Add a Directive to reduce wildfire risk and impact: Consider preventing additional “wildland-urban” interface/intermix development.

Agricultural Lands - No recommendation.

Soil and Fill - No recommendation.

Marine Shorelands - No recommendation (marine ecosystems are addressed in Ecosystem Integrity).

Final Section: Overall Effectiveness of Draft TPS

Recommendation for final survey question: Strongly Disagree – the draft TPS is not effective as written.

Suggested focus for comments

- Define “environment” as “natural environment” (otherwise little protection is given).
- Directive policies must be mandatory for all islands as required by the Islands Trust Act, not optional with justification.
- The Islands Trust was created to prevent overdevelopment. Rezoning for density increases should be **only for affordable housing**.
- TPS should have Directives with measurable goals determining thresholds for habitat health, water sustainability, population density and aligning growth with ecological carrying capacity.
- Groundwater and freshwater protection is inadequate. We need enforceable safeguards/Directives against unsustainable ground and surface water use.
- Climate Change Mitigation/Adaptation is a critical, escalating issue. The Islands Trust declared a Climate Emergency in 2019 and it was identified as a major public concern in prior TPS public consultations. It should be a Goal with specific Directives rather than two very general Directives in this draft under Managing Growth and Development.
- Information about the history, past and present context of the Islands Trust, and implementation of the TPS (including the roles and responsibilities of various bodies involved) has been removed from this draft. Where will this information be found to help people understand why the Islands Trust Act was established and how it is governed? Little education on the Islands Trust is provided to residents or visitors.