

**Friends of the Gulf Islands Society**  
**Analysis and Recommendations on the Proposed New Draft Trust Policy Statement**  
**January 9, 2025**

**Abbreviations:**

- LTCs – Local Trust Committees
- IMs – Island Municipalities
- OCP – Official Community Plan
- TPS – Trust Policy Statement

<b>Recommendations on the Draft TPS</b>		
<b>Text in Current TPS</b>	<b>Text in Draft TPS</b>	<b>Suggested Text</b>
<b>Part 1: The Islands Trust Act. Section 1.4 Purpose and Structure of the Policy Statement</b>		
Page 1 Part 1: Purpose and Implementation of the Trust Policy Statement	“Islands Trust is a federated body responsible for the Trust Area, comprised of 13 major islands and more than 450 smaller islands and the surrounding waters in the Strait of Georgia and Howe Sound. Islands Trust regulates local land use, works with other levels of government, <i>and, through the Islands Trust Conservancy, protects places of natural or cultural significance.</i> This unique governmental mandate is defined in Section 3 of the Islands Trust Act and is commonly referred to as the “Islands Trust Object.” (Page 4, first paragraph)	<p>This new second paragraph directs protection of areas of natural or cultural significance entirely to the Trust Conservancy, i.e. away from the Trust Council Local Trust Committees.</p> <p>This responsibility lies with all bodies of the Islands Trust. The 2023 draft TPS language should be used: “The Act establishes Islands Trust as a special-purpose provincial government agency equipped with a suite of land use planning powers and a <b>conservation-oriented mandate</b> to preserve and protect the region in cooperation with others. This unique governmental mandate was defined in Section 3 of the <i>Islands Trust Act</i> and is commonly referred to as the “Islands Trust Object”.</p>
The current TPS page 2 Item b) states “Where a policy requires a LTC or IM to address a particular matter, the OCPs <b>must</b> contain policies that implement the policy stated by the Trust Council unless the plan sets out explicitly the reasons and justifications for local policies that do not implement that policy.”	<p><b>Page 6 Section 1.4</b> states:            “The Act stipulates that official community plans and bylaws required to be submitted to Executive Committee or Trust Council under the Act <b>must not be approved</b> if they are contrary to or at variance with the Policy Statement. This ensures that the Islands Trust Object is at the core of all planning and land use management decision-making in the Islands Trust Area”.</p> <p><b>Page 7 under “Directive Policies”</b> states:            “...regulatory bylaws of LTCs or Island municipalities should be consistent to avoid rejection or objection when presented by LTCs or island municipalities for consideration or approval</p>	<p>The page 7 reference to “<b>should</b>” conflicts with the Section 1.4 statement because “should” could be read as giving LTCs latitude in being consistent with the policy. This creates confusion and ambiguity.</p> <p>If a directive is a requirement, then there should be no exceptions. If there are exceptions, a Directive fails to be a requirement.</p> <p>The words “<b>should be</b>” should be replaced with “<b>must be</b>”. The words “<b>where possible</b>” should be omitted.</p>

	by Executive Committee or Trust Council. They are also policies that <b>should be</b> directly addressed, <b>where possible</b> , in all community plans and bylaws of a local trust committee or island municipality.”	
<b>Part 2 - General Guiding Principles</b>		
Page 6 - Guiding Principles “When making decisions and exercising judgement, the Trust Council will place <b>priority</b> on preserving and protecting the integrity of the environment and amenities in the Trust Area.”	<b>General Guiding Principles 2.1.</b> - “In its efforts to carry out the Islands Trust Object, Trust Council commits to the following set of shared principles to guide daily planning and decision making by all bodies across the Islands Trust Area.”	The word “ <b>priorities</b> ” should be included in this Guiding Principle as in the following paragraph: “In its efforts to carry out the Islands Trust Object, Trust Council commits to the following set of shared principles <b>and priorities</b> to guide daily planning and decision making by all bodies across the Islands Trust Area.”
	<b>Guiding Principle 2.1.3 Limit the Rate and Scale of Development</b>	This principle should be a Directive that reads: “Limit the rate and scale <b>of growth</b> and development.”
	<b>Guiding Principle 2.1.5. - Take Guidance from the Precautionary Principle</b> “To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there <b>is uncertainty</b> over the potential for serious or irreversible damage from development.”	This Guiding Principle should be a Directive under Ecosystem Integrity 3.3.1 – 3.3.9
Page 7 -The current TPS Policy 3.1.1 states that “planning must account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies and Trust Area species and habitats.”	<b>Guiding Principles 2.1.6 - Account for Cumulative Effects</b> “To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, <b>groundwater supplies</b> , culturally sensitive areas and cultural heritage sites, and species and their habitats.”	Replace words “ <b>to strive to account for</b> ” with “ <b>Prioritize accounting for cumulative effects. . .</b> ” The principle should say “freshwater supplies” instead of “groundwater supplies”. This principle should also be a Directive under Ecosystem Integrity 3.3.1 – 3.3.9. Only Directive 3.5.24 (Marine Docks) refers to cumulative effects.
5.8.1 – Trust Council holds that public participation should be part of the decision-making process and all levels of government. 5.8.2 It is the position of the Trust Council that LTCs and IMs should, in establishing their official community plans and regulatory, provide opportunities for public input.	No similar policy in the draft TPS	Add a policy after Guiding Principal 2.1.7 <b>Foster Public Participation in Decision Making.</b> “Foster public participation in all government decision-making processes and provide opportunities for public input in establishing OCPs and regulatory bylaws.”
	No such policy in the draft TPS	There should be a guiding principle that it is a priority to preserve and protect the natural ecosystems of the Trust

		islands. The lack of such a policy implies there is no commitment to protecting the environment as required by the Trust Object. Our concern is reinforced by the fact that Trust Council published an interpretation of “unique amenities” as including housing, livelihoods, infrastructure and tourism. Under that interpretation of the mandate, if protection is given to human development, there is no real protection for the environment. We interpret “unique amenities” as was interpreted by 1986 Ministry of Municipal Affairs/Islands Trust " <a href="#">Position Paper: The Object of the Islands Trust: Renewing the Consensus</a> " and the 2021 " <a href="#">Discussion Paper: The Islands Trust Object: Past, Present and Future</a> ".
	This principle is missing from the draft TPS	There should be a guiding principle that the word “environment” means the “ <b>natural environment.</b> ” Without this definition, the word “environment” can refer to anything that exists in the world.
<b>Goal 3 - Preserve and Protect Healthy and Biodiverse Ecosystems – Directive Policies – Ecosystem Integrity</b>		
Current TPS section 3.3.2 states “LTCs and IMs shall, in their OCPs and regulatory bylaws address means to prevent further loss or degradation of freshwater bodies or watercourses, wetlands and riparian zones and protect aquatic wildlife.”	<b>Directive Policies 3.3.2 -3.3.8</b> use the words “Identify and prioritize the preservation, protection and restoration of...” etc. for all of these items.	Retain the word “ <b>prioritize</b> ” in these policies. All these items should also say “prevent the further loss and degradation of (each ecosystem).”
3.2.1 Commitment “The remaining stands or relatively undisturbed Coastal Douglas fir, Coastal Western Hemlock, Garry Oak and Arbutus should be preserved.”	<b>3.3.3 Forest Ecosystems</b> “Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forest with a particular focus on the maintenance and restoration of their ecological integrity.”	Suggested preferable text: 3.3.3 “Identify and protect unfragmented forest ecosystems, the remaining stands of relatively undisturbed Coastal Douglas-fir, Western Red Cedar, Arbutus, Garry Oak and Coastal Western Hemlock and their associated ecosystems within their local planning areas from potentially adverse impacts of growth, development and land-use.” For clarity and completeness, the suggested text names <b>specific ecosystems</b> to be protected.
Prairie Ecosystem is not mentioned in the current TPS.	<b>3.3.4 Coastal Oak and Prairie Ecosystems –</b> “Identify and prioritize the preservation, protection of coastal oak and prairie ecosystems, with a particular focus on the maintenance, restoration and management of their ecological integrity.”	No explanation is given as to why this is identified as a separate category of ecosystem. Many ecosystems are omitted. The Directive should list all appropriate forest ecosystems. See 3.2.1 from current TPS quoted above under policy 3.3.3.
<b>Directive 3.3.2</b> “LTCs and IMs shall, in their	<b>3.3.5 Watershed Ecosystems</b> - “Identify and	Add “ <b>wetlands and riparian areas</b> ”.

OCPs and regulatory bylaws, address means to prevent the further loss or degradation of freshwater bodies or watercourses wetlands and riparian zones and to protect aquatic wildlife.”	prioritize the preservation, protection, and restoration of watershed ecosystems, freshwater sources, and groundwater recharge areas.”	Add. “ <b>Prevent further loss or degradation of ...</b> ”.
<b>Directive 3.4.5</b> “LTCs and IMs shall, in their OCPs and regulatory bylaws, address the planning for and regulation of development in coastal regions to protect natural coastal processes.”	<b>3.3.6 Marine Shoreline and Nearshore Areas</b> – “Identify and prioritize the preservation and restoration of eelgrass meadows kelp forests, forage fish spawning area, clam beds, estuaries, tidal salt marshes, mud flats and coastal wetlands.”	This item only prioritizes specific ecosystems. There are coastal ecosystems beyond the several mentioned here. The words “ <b>and other marine ecosystems</b> ” should be added.
<b>Goal 4 - Directive Policies – Managing Growth and Development (Heading should be changed to “Limiting Growth and Development”)</b>		
	<b>3.4.1 Sustainable Development</b> - “Consider site capabilities, environmental and protected areas, and existing development patterns when determining the land use designation and appropriate locations and intensities of various uses of the land.”	Recommend restoring language as in Trust 2023 staff draft TPS as repeated below. <b>3.4.1 Sustainable Development</b> “Ensure development is compact, energy efficient and appropriately situated on island and on the site in order to reduce dependency on private automobile use, and support increase use of trail systems, public transportation, and active transportation, be compatible with preservation and protection of the Trust Area and its unique amenities and environment, and limit impacts on indigenous cultural heritage harvesting and hunting areas.”
	<b>3.4.2 Growth Management</b> - “Manage community growth and its associated impacts by directing residential, commercial and industrial development into suitable locations to prevent sprawl, relieve growth pressures in the surrounding rural areas, and help to safeguard protected area networks.”	Change heading to “ <b>Limit Growth and Development</b> ”. Should read: “Establish appropriate density and <u>population limits</u> to prevent sprawl, conserve freshwater resources, protect groundwater recharge areas prevent septic contamination, maintain rural character, prevent salt water intrusion and protect unique amenities and natural environment of the trust area.”
	<b>3.4.5 Climate Change Mitigation &amp; Adaptation</b>	This item should be under a separate Goal with specific Directives. Climate change was identified as a key issue in past public engagement and the Trust declared a climate emergency in 2019.
<b>Commitment of Trust Council 5.6.1</b> “Trust Council holds that the natural and human heritage of the Trust Area – that is the areas of property of natural, historic, cultural, aesthetic, educational or scientific heritage value or character – should be identified preserved, protected and enhanced.”	<b>3.4.8 Community Heritage Sites</b> - “Identify, preserve and protect and support the restoration of community heritage sites.”	Restore language similar to that in the current TPS sections 5.6.1 and 5.6.2 “Identify sites of natural or human heritage that are of natural, historic, cultural, aesthetic, educational or scientific heritage to be preserved and protected.”
<b>Directive Policy 5.6.2</b> “LTCs and IMs shall, in their OCPs and regulatory bylaws, address the		

identification, protection, preservation and enhancement of local heritage.”		
	<b>3.4.9 Advisory Policy</b> - “Identify land where current zoning or other land use regulations allow development that could be inconsistent with the object of the trust and consider policy and/or regulatory options to reduce development potential or minimize the impacts of future development.”	This Advisory Policy should be a Directive. “3.4.9 Identify land where current zoning or other land use regulations allow development that could be inconsistent with the object of the trust and implement policy and/or regulatory options to reduce development potential or minimize the impacts of future development.”
<b>Directive 5.2.6</b> “LTCs and IMs shall, in their OCPs and regulatory bylaws, address means for achieving efficient use of the land base <b>without exceeding any density limits defined in their OCPs.</b> ”		This Directive from the current TPS should be added to the new TPS under <b>Directive Policies – Limiting Growth and Development.</b>
.	This Directive is missing from the draft TPS	A Directive should be added to <b>Directive Policies – Limiting Growth and Development</b> to require each LTC to assess growth limits and then set those limits as per the 2023 draft TPS.
<b>Goal 4 - Continued – Directive Policies – Housing</b>		
<b>5.8.6</b> “LTCs & IMs shall, in their official plans and regulatory bylaws, address their community’s current and projected housing requirements and the long-term needs for educational, institutional, community and health-related facilities and services, as well as the cultural and recreational facilities and services.”	<b>3.4.11 Suitable Locations for Additional Housing</b> - “Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable housing.”	The title of this section should read “Suitable locations for <b>Affordable Housing.</b> ” An online search provides many definitions of “attainable housing” all generally aimed at persons who cannot afford market housing. The use of this term requires a definition in the Glossary with a precise income level that is targeted. Without this, the policy allows for LTCs to make zone changes and give other benefits to developers of any type of market housing and will not necessarily produce housing for those persons providing community services. Suggested alternate wording for this policy: “3.4.11 “Identify suitable locations that could support increased density for the development of affordable housing where there is sufficient water and sewage disposal capacity, where it will not adversely affect other groundwater users, groundwater recharge areas, and native ecosystems.”
	<b>3.4.15</b> Prioritize the processing of rezoning applications from non-profit housing providers and public agencies, and the processing of housing agreement bylaws for affordable and special needs housing.	This policy does not require housing agreements for housing built by private developers. There should be a <b>Directive</b> that increased density should <b>only be for affordable housing or worker housing always with housing agreements</b> to assure affordability to persons at

		specific income levels.
Current TPS has no policy on clustering dwellings	<b>3.4.13 Clustered Small Dwelling Units</b> – “Support alternatives to conventional single-detached dwellings by establishing policies to permit clusters of small dwelling units in suitable areas.”	<p>Alternatives to single-detached are connected units, i.e. multi-family development. This is a conventional structure type.</p> <p>We support subdivision by clustering existing densities on a lot but not adding densities for market housing with no restrictions to assure affordability to target residents.</p> <p>Alternate Language: “As an alternative to a conventional subdivision, support clustering currently allowed densities where water supplies and sewage disposal capacity is available and will not adversely affect other groundwater users, groundwater recharge areas, and native ecosystems.”</p>
Current TPS has no policies on floor area coverage	<b>3.4.14 Floor Area and Lot Coverage Limits</b> – Set floor area and lot coverage limits for residential development to minimize negative environmental impacts, including on land used for agricultural purposes.”	The use of “floor area” is inappropriate for the islands to use as a zoning tool because it allows several residences on properties currently zoned for one residence. Additional residences, means more residents which has major impacts on the environment, more water use, more sewage produced, more cars, and greater impact on community infrastructure and services. This Directive is poorly worded when read in conjunction with the Glossary definition of “density” and will be problematic. This policy should read: 3.4.14 Lot Coverage Limits – Set lot coverage limits for residential development to minimize negative environmental impacts ...etc.”
	This Directive is missing from the draft TPS	Add this Directive to this section after 3.4.16: “To <b>protect rural character and reduce impact on the natural environment</b> , LTCs should establish a limit on the size of single family residences on their island.”
<b>Goal 4 - Continued - Directive Policies Transportation</b>		
5.3.4 “LTCs and IMs shall, in their OCPs and regulatory bylaws address the development of a classification system of rural roadways, including scenic or heritage road designations, in recognition of the Object of the Islands Trust.”	This Directive is missing from the draft TPS	After 3.4.21 add a Directive “Identify and establish regulatory bylaws to support development of a classification system of rural roadways, including scenic or heritage road designations, in recognition of the Object of the Trust.”
5.3.2 (Commitment) “No island in the Trust Area should be connected to Vancouver Island, the	This policy is missing from the draft TPS	Add Advisory Policy – Transportation-“No island in the Trust Area should be connected to Vancouver Island, the

mainland or another island by a bridge or tunnel, notwithstanding the existing bridge between North and South Pender Islands.”		mainland or another island by a bridge or tunnel, notwithstanding the existing bridge between North and South Pender Islands.”
<b>Goal 4 - Continued - Directive Policies - Waste, Emissions and Pollutants</b>		
	<b>3.4.26 Disposal of Waste</b> - Establish requirements for the location and siting of new wastewater disposal systems to mitigate adverse impacts on the Trust Area and its unique amenities and environment, with a focus on Indigenous Peoples; cultural heritage sites and marine harvesting areas.	Attention should also be given to protecting the entire population from pollution, protecting groundwater and freshwater. “Mitigate” is a weak word to use here. Suggested policy below. “Establish requirements for the location and siting of new wastewater disposal systems to prevent negative impacts on Indigenous people’s cultural heritage, marine harvesting areas, groundwater, freshwater and marine environments.”
5.4.2 Commitments of Trust Council “Neither hazardous nor industrial waste should be disposed of in the Trust Area.”	The current draft TPS has no such directive.	After 3.5.7. add a Directive “Neither hazardous nor industrial waste should be disposed of in the Trust Area.”
	The current draft TPS has no such directive.	After 3.5.7 add a Directive “Use land use planning powers to ensure that groundwater users are not harmed by pollution from septic systems.”
<b>Goal 5 - Directive Policies - Freshwater</b>		
	<b>Goal 5: Foster Sustainable Stewardship of Lands and Waters</b> - “ITC recognizes that sustainable use of lands and waters in the IT Area is <b>important</b> to the long-term well-being and resilience of ecosystems in the IT Area and the communities that depend on them.”	Wording should be “ <b>Ensure</b> Sustainable Stewardship of Lands and Waters”  The word “ <b>important</b> ” should be changed to “ <b>essential</b> ” as in “ITC recognizes that sustainable use of lands and waters in the IT Area is essential to the long-term well-being and resilience of ecosystems in the IT Area and the communities that depend on them.”
	<b>3.5.2 - 3.5.3 Freshwater</b>	Add in the beginning of each Directive: “When considering zoning changes or increases in density, ensure that .....etc.”
4.4.2 “LTCs and IMs shall, in their official community plans and regulatory bylaws, address measures that ensure: - neither the density nor intensity of land use is increased in areas which are known to have a problem with the quality or quantity of the supply of freshwater, - water quality is maintained, and - existing, anticipated and seasonal demands for water are considered and allowed for.”	<b>3.5.1 Freshwater Sustainability</b> - “Ensure the neither the density, nor intensity of land use is increased in watersheds where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable.”	<b>Suggested alternate language 3.5.1:</b> “Ensure that neither the density nor intensity of land use is increased in watersheds <b>or neighbourhoods</b> where there is likely to be or already is, a problem with the quality or quantity of the supply of freshwater.” The inclusion of the word “neighbourhoods” allows for consideration of local knowledge.
	The current draft TPS has no such directive.	Add a directive to ensure that local

		knowledge/experience with water shortages is considered on an equal footing with estimates based on computer models.
	<b>3.5.3 Freshwater Self-Sufficiency</b> - “Ensure islands are self-sufficient in water.”	Because many islands are already NOT self-sufficient in water, we suggest this policy be worded: “Identify which islands are not self-sufficient in water, take action to minimize additional dependence on off-island water and assure other islands maintain self-sufficiency in water.”
	The current draft TPS has no such directive.	<b>Add a Directive after 3.5.4</b> “Use land use planning tools such as large lot zoning and DPAs to protect ground and surface water by protecting groundwater recharge areas, forests, and native ecosystems.”
<b>Advisory Policies – Freshwater</b>		
	<b>3.5.7 Freshwater Storage</b> - “Encourage freshwater storage in groundwater regions where the quality or quantity is likely to be inadequate or unsustainable.”	<b>Reword this policy thus:</b> “Encourage freshwater storage and water conservation strategies in all areas of the Trust islands.”
<b>Goal 5 - Continued - Directive Policies – Forest Lands</b>		
	<b>3.5.10 Forest Lands and Wildfire Risk Management</b> - “Identify planning and land use management strategies that mitigate wildfire risk and that are appropriate to the unique biogeoclimatic zones and settlement patterns of each planning area. “	Wildfire risk will be reduced by reducing areas of interface between development and the forest. We <u>do not</u> want to continue current “settlement patterns” that intersperse development in the forest.  Suggest alternate language: “Identify planning and land use management strategies that mitigate wildfire risk, that are appropriate to the islands’ unique biogeoclimatic zones and reduce or prevent additional wildland urban interface and intermix.”
	The current draft TPS has no such policy.	Add additional policy “Implement Local Fire Department Wildfire Resiliency Plans”
Directive 3.2.2 “LTCs and IMs shall, in their official community uplands and regulatory bylaws, address the protection of unfragmented forest ecosystems within their local planning areas from potentially adverse impacts of growth, development and land-use.”	<b>Directive 3.3.3 Forest Ecosystems</b> – “Identify forest ecosystems and prioritize the preservation and protection of unfragmented forests, with a particular focus on the maintenance of and restoration of their ecological integrity”.	Restore Directive 3.2.2 from the current TPS that specifically identifies “ <b>potentially adverse impacts of growth, development and land-use.</b> ”
	The current draft TPS has no such Goal.	<b>Add a Goal 6 - Climate Change Mitigation &amp; Adaptation.</b> There is little focus on climate change in this draft; yet it was one of the 3 identified “pillars” of

		the January 2021 Policy Directions: Visual Policy Analysis & Public Engagement Phase II document. As well, the Trust declared a Climate Emergency in 2019. There were Directives on Climate Change suggested in the Islands 2050 - Fact Sheet that are not reflected here. It is only mentioned briefly in Directive 3.4.5.
<b>Glossary</b>		
No definition of “environment” in the current TPS	The draft TPS currently has no definition of the word “environment”.	We suggest this definition: The 2023 TPS draft had this definition of the environment, “The term “environment” in this document is interpreted to mean the natural environment.” Or “Environment as a term is most commonly used to describe the <i>natural environment</i> , which includes physical components such as air, temperature, landforms, soils, and bodies of water, as well as living components such as plants, animals, and microorganisms. The natural environment exists in contrast to the <i>built environment</i> , which includes all human-made elements and processes. Damon P. Coppola, in <u>Introduction to International Disaster Management (Third Edition)</u> , 2015.
No such definition in the Current TPS	<b>Glossary definition: Land Use Density &amp; Intensity</b> - Density is regulated through zoning. Density may also be defined by the number of units per also be measured by dividing the built area including all floor area, by the total area of the lot, given area of land. e.g., floor area ratio (FAR).”	We object strongly to this definition of density. Density is the number of residences (and indirectly the number of likely residents) allowed to be built on a property. Allowing more residences and residents by defining density by occupied floor area will allow many more residences (and residents), i.e. an increase in density because more people use more water, produce more sewage, likely have more vehicles, etc.  This definition should read: “Density is regulated through zoning that states the number of residences, or businesses allowed on a particular property.”
	The current draft TPS has no such definition	Insert a definition similar to this: “Local knowledge refers to the understanding and insights of individuals have about their own community culture, neighbourhood, environment, and practices, often accumulated through personal experience. By valuing and integrating local knowledge, communities can contribute to land use discussions, preserve cultural

		heritage and promote more effective decision-making aligned with their unique needs and circumstances.” Based on the definition of local knowledge at: <a href="https://www.vaia.com/en-us/explanations/anthropology/museum-studies/cultural-heritage/">https://www.vaia.com/en-us/explanations/anthropology/museum-studies/cultural-heritage/</a>
	The current draft TPS has no such definition.	A definition of aquaculture is needed. Many people do not know what this is.
	The current draft TPS has no such definition.	A definition of “attainable housing” is needed that includes the requirement for a housing agreement that assures affordability to people providing island services and does not subsidize developers of expensive housing.
<b>Part 4: Implementation</b>		
	Policy 4.1 states in part, “Islands Trust Council, Islands Trust Executive Committee and LTCs are expected to take general policy direction from the Policy Statement....etc.”	The Trust Policy Statement should provide more than “ <b>general direction</b> ” because otherwise it has little meaning. Directives should be requirements, not policies that can be avoided by providing excuses. There is no reason that all islands in the Trust Area should not have OCPs and Bylaws consistent with these Directives. This statement should read: “Islands Trust Council, Islands Trust Executive Committee and LTCs <b>must</b> take policy direction from the Policy Statement....etc.”