



DRAFT Islands Trust Council Committee of the Whole Meeting Agenda

Date: Wednesday, July 9, 2025

Time: 9:00 a.m. - 4:00 p.m. (end time is approximate)

Location: Electronic Meeting, and a physical location to view the livestream of the meeting:
Islands Trust Victoria Office
#200 - 1627 Fort Street
Victoria, BC V8R 1H8

		Pages
1.	CALL TO ORDER	
2.	TERRITORIAL ACKNOWLEDGEMENT	
3.	APPROVAL OF AGENDA	
4.	ADOPTION OF MINUTES / RESOLUTIONS WITHOUT MEETING	
4.1	<u>Draft Committee of the Whole Meeting Minutes of May 6, 2025</u>	3 - 9
	For review and adoption.	
4.2	<u>Draft Committee of the Whole Meeting Minutes of May 13, 2025</u>	10 - 15
	For review and adoption.	
4.3	<u>TC COW RWM 2025-04 Cancel May 29, 2025 Committee of the Whole Meeting</u>	16 - 16
	Receive for information.	
4.4	<u>TC COW RWM 2025-05 Cancel June 6, 2025 Committee of the Whole Meeting</u>	17 - 17
	Receive for information.	
5.	FOLLOW UP ACTION LIST	
5.1	<u>Committee of the Whole Follow Up Action List</u>	18 - 18
6.	CLOSED MEETING	
	THAT the meeting be closed to the public subject to Sections 90(1)(i) of the Community Charter in order to consider matters related to the receipt of advice that is subject to solicitor-client privilege, including communications necessary for that purpose; and that staff attend the meeting.	
7.	RISE AND REPORT	
8.	BUSINESS	

THAT Committee of the Whole recommend to Executive Committee that it forward the draft new Policy Statement to Islands Trust Council for consideration of First reading.

9. NEW BUSINESS

10. NEXT MEETING

At this time, there are no scheduled Committee of the Whole meetings in the future.

11. ADJOURNMENT

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Trust Council Committee of the Whole Minutes of a Regular Meeting

Date: May 6, 2025
Location: Electronic Meeting

Executive Members Present:

1. Laura Patrick, Trust Council Chair, Salt Spring Trustee
2. Tobi Elliott, Vice-Chair, Gabriola Trustee
3. David Maude, Vice-Chair, Mayne Trustee
4. Timothy Peterson, Vice-Chair, Lasqueti Trustee

Members Present:

5. Sue Ellen Fast, Bowen Municipal Trustee
6. Judith Gedy, Bowen Municipal Trustee
7. Sam Borthwick, Denman Trustee
8. David Graham, Denman Trustee
9. Susan Yates, Gabriola Trustee
10. Joe Bernardo, Gambier Trustee
11. Jeanine Dodds, Mayne Trustee
12. Deb Morrison, North Pender Trustee
13. Mairead Boland, Saturna Trustee
14. Lee Middleton, Saturna Trustee
15. Kristina Evans, South Pender Trustee

Members Regrets:

16. Lisa Gauvreau, Galiano Trustee

Members Absent:

17. Ben Mabberley, Galiano Trustee
18. Kate-Louise Stamford, Gambier Trustee
19. Alex Allen, Hornby Trustee
20. Grant Scott, Hornby Trustee
21. Mikaila Lironi, Lasqueti Trustee
22. Aaron Campbell, North Pender Trustee
23. Jamie Harris, Salt Spring Trustee
24. Dag Falck, South Pender Trustee
25. Ken Hunter, Thetis Trustee
26. Peter Luckham, Thetis Trustee

Staff Present:

Rueben Bronee, Chief Administrative Officer
Stefan Cermak, Director, Planning Services
Clare Frater, Director, Trust Area Services
David Marlor, Director, Legislative and Information Services
Julia Mobbs, Director, Finance and Employee Services
Joe Elliott, Senior Indigenous Advisor
Alexandra Trifonidis, Executive Coordinator
Lisa Millard, Meeting Administrator/Recorder

Others Present: There were two members of the public in attendance.

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1. CALL TO ORDER

Chair Patrick called the meeting to order at 5:32 p.m.

2. TERRITORIAL ACKNOWLEDGEMENT

Chair Patrick acknowledged that the meeting was held on the territory of the Coast Salish First Nations and recognized that the previous day was Red Dress Day, a National Day of Awareness and remembrance for missing and murdered Indigenous women and girls (MMIWG) and 2slgbtqi+ people.

3. APPROVAL OF AGENDA

By general consent the agenda was approved as presented.

4. ADOPTION OF MINUTES / RESOLUTIONS WITHOUT MEETING

4.1 Draft Committee of the Whole Trust Meeting Minutes of February 6, 2025

By general consent the Committee of the Whole meeting minutes of February 6, 2025 were adopted as presented.

4.2 Draft Committee of the Whole Trust Meeting Minutes of February 21, 2025

By general consent the Committee of the Whole meeting minutes of February 21, 2025 were adopted as presented.

4.3 TC COW RWM 2025-01 Schedule Meeting

Received for information.

4.4 TC COW RWM 2025-02 Cancel March 31, 2025 Committee of the Whole Meeting

Received for information.

4.5 TC COW RWM 2025-03 Cancel April 15, 2025 Committee of the Whole Meeting

Received for information.

5. FOLLOW UP ACTION LIST

All previous items on the Follow Up Action List related to the draft Policy Statement Amendment Project have been moved to the Trust Programs Committee Follow Up Action List.

6. BUSINESS

6.1 Islands Trust Mandate - Discussion

6.1.1 Background

Chair Patrick provided written background information, included in the agenda package, which summarized a series of resolutions made by a previous Trust Council in 2021 and the 2022 Governance Report outlining the recommendation that Trust Council interpret the Object.

6.1.2 How did the September 2023 statement come about?

Trustees Gedye and Bernardo reviewed how the September 2023 *Islands Trust Council Statement on the Scope and Meaning of Section 3 of the Islands Trust Act* was prepared and highlighted the following:

- At the beginning of the term, the Governance Committee understood its task was to assess and prioritize the recommendations outlined in the Governance Report and bring forward implementation proposals for Trust Council's consideration;
- The report identified the lack of an agreed upon interpretation of the Section 3 mandate resulting in challenges establishing policy direction due to trustees competing conceptions of its meaning;
- The Governance Committee asked staff to go through archives to find any past legal opinions that addressed Section 3 interpretation;
- Two of the legal opinions were prominent including one provided by the law firm Young Anderson prepared at Trust Council's request in response to another prepared by the law firm Mandell Pinder requested by a third party;
- The Governance Committee discussed the legal opinions and determined to bring them to Trust Council's attention as part of the discussion on interpreting the Object of the Islands Trust;
- The Governance Committee provided an accompanying summary of the key points and issues of the legal opinions and the summary became the basis for subsequent discussion during an in-camera meeting;
- The Committee did not provide this information to staff for input or recommendations;
- During the September 2023 in-camera meeting the Governance Committee explained, to the best of their ability, the legal opinions;
- The statutory interpretation of the Object was pivotal to taking three distinct elements into consideration;
- Following the in-camera meeting, the edited and published version of the rise and report did not have the same understanding of importance of items of consensus; and
- Following the publication of the rise and report, and subsequent removal of the link for the website, it became apparent from feedback there were significant community concerns.

6.1.2.1 Islands Trust Council Statement on the Scope and Meaning of Section 3 of the Islands Trust Act (Object Clause)

Statement included in agenda package for reference.

6.1.2.2 Publicly Released Legal Opinion

Opinion included in agenda package for reference.

Trustee Middleton joined the meeting at 5:55 p.m.

6.1.3 How do we understand the mandate?

Each trustee contributed to a roundtable discussion and the following common themes were heard:

Results of the in-camera session and content and release of the *Islands Trust Council Statement on the Scope and Meaning of Section 3 of the Islands Trust Act*

- The controversy and confusion as a result of the in-camera session and communication following the discussion and decision as outlined in the September 2023 Statement was unfortunate and not anticipated;
- The in-camera session consisted of thorough consideration of the various legal opinions and the term “consensus” used in the public communication led to the implication that a decision was made in-camera;
- The in-camera session was not a decision-making process about the mandate but a decision-making process about the legal interpretation of the mandate which was appropriate for a closed meeting;
- The Statement was intended to be a summary statement and came to be called a consensus statement and many consider the term consensus to mean unanimous;
- The September 2023 release stated consensus about the Object of the Islands Trust to preserve and protect three specific elements including the Trust area, its unique amenities, and the environment for the benefit of its residents and the people of BC and there was consensus on this; however, the statement that it is Trust Council’s view that unique amenities are broad ranging was not a consensus view;
- The rise and report left the community with the impression that the preservation and protection of the natural environment would no longer be a priority;
- The statement made to the public that Trust Council’s view is that unique amenities are broad ranging and may include issues such as, but not limited to, housing, livelihoods, infrastructure and tourism was problematic and not framed correctly;
- The rise and report language ought to have been more robust, communication could have been timelier, and an explanation of why the meeting was held in-camera is important.

The elements of the Islands Trust Mandate and the Trust Policy Statement

- The 1975 Trust Policy Statement states “recognition of the islands are, first of all, an existing community of people, and the welfare of those peoples, and those who join them and come after them, must always be a primary concern of the Trust” and these words speak to the intent of the founders of Islands Trust;

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- The current Trust Policy Statement, and its meaning, remains valid and should be included in the amended Trust Policy Statement with the inclusion of First Nations reconciliation and obligations under the Declaration on the Rights of Indigenous Peoples Act (DRIPA);
- There is a misperception that Trust Council is attempting to redefine the Object;
- It is Trust Council's discretion to decide how much emphasis to put on each of the three elements of the mandate at any given time, or on any given issue while still balancing each of them;
- The statement reflects that a balance must be established between the needs of all stakeholders;
- The words preserve and protect the environment and the unique amenities show that there are parallel paths;
- Islands Trusts is a land use planning agency that must take the Object into consideration when making land use decisions;
- The Trust Area was not created as an ecological reserve and includes human and economic functions and environmental protections need to consider these factors;
- Positing the Trust mandate to support inclusive, sustainable, healthy communities as separate from the mandate to enhance and protect the natural ecosystem will fail to serve either of them as people are not separate from the land and the water;
- Ministry staff have reinforced the view that the statement is open to interpretation intentionally to permit and allow Trust Council to work within the words; and
- It would be beneficial to publish an information piece on the website which explains the Mandate, and Trust Council's interpretation of it, more fully.

The 1986 Agreement between Islands Trust and the Province of BC

- The 1986 position piece had not been referenced in previous discussions and it remains relevant and could be used to create an updated version; and
- Trust Council needs to take time to review and consider the 1986 agreement between the Trust and the Province and expand on the public facing opinion received from Young Anderson with focus on the July, 2007 opinion and clarify the legalese to the public.

Chair Patrick summarized the roundtable discussion as follows:

- A thoughtful, plain language, website page summarizing what the mandate means should be published;
- Include a clear version of the interpretation of the mandate within the Trust Policy Statement and provide clarity on how the mandate connects to the Statement;
- Create summary notes of the May 6, 2025 Committee of the Whole meeting to release to the public; and
- There is support for an archivist to aid in research.

During the roundtable discussion at 6.1.3, Trustee attendance was recorded as follows:

Trustee Maude joined the meeting at 6:12 p.m.

Trustee Peterson left the meeting at 6:20 p.m. and returned at 6:23 p.m.

Trustee Dodds left the meeting at 6:30 p.m. and returned at 6:40 p.m.

Trustee Bernardo left the meeting at 6:40 p.m.

Trustee Borthwick left the meeting at 6:47 p.m. returned 6:51 p.m.

Trustee Middleton left the meeting at an unknown time and returned at 6:54 p.m.

Trustee Morrison left the meeting at 7:40 p.m.

6.1.4 Next steps

Discussion ensued regarding potential recommendations to Trust Council on next steps.

TC-COW-2025-020

It was MOVED by Trustee Peterson, and SECONDED by Trustee Yates,

that Committee of the Whole recommend that Executive Committee direct staff to produce a short summary of the Committee of the Whole meeting of May 6 for public release.

CARRIED

A trustee requested Trust Programs Committee consider Section II of the Islands Trust's Object and it's meaning, Page 5, in the current Islands Trust Policy Statement, 1998 for inclusion in the current interpretation and reinstated in the new policy.

The Director of Trust Programs noted it would be prudent to look at feedback received from First Nations on language that was in the original Trust Policy Statement amendment.

Trustee Dodds left the meeting at 8:00 p.m.

At 8:00 p.m. quorum was lost due to a member leaving the meeting. As a result, the meeting was adjourned. A limited procedural action of confirming the next meeting date was taken during this time, but no formal voting was possible.

7. CLOSED MEETING (If needed) - None

8. RISE AND REPORT - None

9. NEW BUSINESS - None

10. NEXT MEETING

The next scheduled Committee of the Whole meeting will take place electronically on May 13, 2025 at 1:00 p.m.

11. ADJOURNMENT

Laura Patrick, Chair

Certified Correct:

Lisa Millard, Meeting Administrator/Recorder

Meeting minutes are not official until adopted at a subsequent meeting.



Trust Council Committee of the Whole Minutes of a Regular Meeting

Date: May 13, 2025
Location: Electronic Meeting

Executive Members Present:

1. Laura Patrick, Trust Council Chair, Salt Spring Trustee
2. Tobi Elliott, Vice-Chair, Gabriola Trustee
3. David Maude, Vice-Chair, Mayne Trustee
4. Timothy Peterson, Vice-Chair, Lasqueti Trustee

Members Present:

5. Judith Gedye, Bowen Municipal Trustee, Acting Chair
6. Sue Ellen Fast, Bowen Municipal Trustee
7. Sam Borthwick, Denman Trustee
8. David Graham, Denman Trustee
9. Joe Bernardo, Gambier Trustee
10. Kate-Louise Stamford, Gambier Trustee
11. Deb Morrison, North Pender Trustee
12. Jamie Harris, Salt Spring Trustee
13. Mairead Boland, Saturna Trustee
14. Lee Middleton, Saturna Trustee
15. Kristina Evans, South Pender Trustee
16. Dag Falck, South Pender Trustee
17. Peter Luckham, Thetis Trustee

Members Regrets:

18. Grant Scott, Hornby Trustee
19. Susan Yates, Gabriola Trustee
20. Lisa Gauvreau, Galiano Trustee
21. Mikaila Lironi, Lasqueti Trustee
22. Jeanine Dodds, Mayne Trustee

Members Absent:

23. Ben Mabberley, Galiano Trustee
24. Alex Allen, Hornby Trustee
25. Aaron Campbell, North Pender Trustee
26. Ken Hunter, Thetis Trustee

Staff Present:

Rueben Bronee, Chief Administrative Officer
Stefan Cermak, Director, Planning Services
Clare Frater, Director, Trust Area Services
David Marlor, Director, Legislative and Information Services
Julia Mobbs, Director, Financial and Employee Services
Joe Elliott, Senior Indigenous Advisor
Alexandra Trifonidis, Executive Coordinator
Lisa Millard, Meeting Administrator/Recorder

Others Present: There were no members of the public in attendance.

1. CALL TO ORDER

Acting Chair Gedye called the meeting to order at 1:05 p.m.

2. TERRITORIAL ACKNOWLEDGEMENT

Acting Chair Gedye acknowledged that the meeting was held on the territory of the Coast Salish First Nations.

3. APPROVAL OF AGENDA

By general consent the agenda was approved as presented.

4. ADOPTION OF MINUTES

At the time of agenda circulation, there were no Committee of the Whole draft meeting minutes for review and adoption.

5. FOLLOW UP ACTION LIST

At the time of agenda circulation, there were no items on the Follow Up Action List.

6. BUSINESS

6.1 2022 Governance Report Recommendations - Request For Decision

Chair Gedye stated the March 2022 Governance Review was commissioned by a previous Trust Council and the meeting was an opportunity for the Committee of the Whole to accept or amend the recommendations made by the Governance Committee pertaining to each of the 15 recommendations outlined in the Governance Report and ascertain what to put before Trust Council for further discussion.

- A. Regarding recommendation 1 of the 2022 Governance Report [election of Trust Council leadership], that Trust Council *request staff to work with Governance Committee to review the process for election of the Executive Committee, and delegated authorities to the Executive Committee;*

Discussion ensued and there was general support for review of the process of Executive Committee elections and the following comments were noted:

- Establishing an interim Executive Committee for a three-month period would allow Trustees to get to know the candidates and their positions;
- Many authorities have been delegated to Executive Committee over a period of years and a review is necessary;
- Those interested in running for the Executive Committee could provide information about their qualifications during the period between the election and the first Trust Council meeting; and
- Emphasis should be put on training and orientation rather than evaluating qualifications for the role.

Trustee Falck joined the meeting at 1:50 p.m.

- B. Regarding recommendation 3 of the 2022 Governance Report [committee membership], that Trust Council consider whether any work is warranted;
- C. Regarding recommendation 4 of the 2022 Governance Report [committee mandates], that Trust Council *request staff to review how it establishes its committee work programs;*
- D. Regarding recommendation 5 of the 2022 Governance Report [roles of committees], that Trust Council *request staff to review how committees present and support their advice to Trust Council and the timing of the presentations to Trust Council,*

Discussion ensued on Items B, C, and D and there was general support to request Trust Council form a working group of the Governance Committee to provide options on topics regarding recommendations 2, 3, 4 and 5 of the 2022 Governance Report and the following comments were noted:

- Fewer trustees are participating in committees and consideration could be given to a policy requiring participation in at least one committee;
- Disclosure of the time commitment required to sit on committees is needed;
- Smaller committees with focussed topics might achieve higher participation;
- Exploration of options for inter-agency and inter-governmental committees could be returned to Governance Committee for discussion;
- There are administrative constraints on the committee structure and clarity is needed on what constitutes a committee versus a working group;
- Additional staff support is not available to review how committee work programs are established and Trust Council would need to determine how priorities fit into the work program.

Trustee Bernardo left the meeting 2:19 p.m.

Trustee Middleton left the meeting at 3:00 p.m.

The meeting recessed for a break at 3:00 p.m. and reconvened at 3:10 p.m.

- E. Regarding recommendation 6 of the 2022 Governance Report [helping trustees understand their roles], that Trust Council *request staff to work with the Executive Committee to develop, in advance of the 2026 election, communication materials on the roles of trustees;*
- F. Regarding recommendation 7 of the 2022 Governance Report [helping trustees fulfil their roles] that Trust Council *request staff to update, in advance of the 2026 election, the orientation approach for trustees with a focus on procedural and substantive matters;*

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Discussion ensued on recommendations 6 and 7 of the Governance Report and there was general support for developing additional materials to help inform trustees of their roles and the following comments were recorded:

- Provide initial training, ongoing support, and mentorship opportunities;
- Provide information on the estimated time commitments required to perform the role of a trustee at the Local Trust Committee and Federation levels prior to individuals committing to election-;
- Provide each trustee a professional learning budget; and
- Communicate to the public regarding the role of trustees.

Trustee Luckham left the meeting at 3:18 p.m.

Trustees Stamford and Morrison left the meeting at 4:00 p.m.

At 4:00 p.m. quorum was lost due to members leaving the meeting. As a result, the meeting was adjourned.

Staff noted the meeting notes would be provided to the Governance Committee.

Due to time constraints Item 6.1 (G) to Item 11 were not discussed and will be brought forward to a future meeting.

- G. Regarding recommendation 8 of the 2022 Governance Report [secretary to Trust Council] that Trust Council *request staff review the function of the Corporate Secretary*;
- H. Regarding recommendation 11 of the 2022 Governance Report [adoption of comprehensive, multi-year planning document] that Trust Council *request staff update and recommend to Trust Council policies to incorporate the Corporate Plan Planning Framework in its operations and budgeting processes*;
- I. Regarding recommendation 12 of the 2022 Governance Report [communications and engagement] that Trust Council *request staff work with the Executive Committee to review and update Trust bodies' advocacy policies*;
- J. Regarding recommendation 13 of the 2022 Governance Report [management alignment with Trust Council] that Trust Council *request staff to work with the Executive Committee to review staff support to Trust Council, identify strengths and weaknesses in that support, and options for addressing that analysis*;
- K. Regarding recommendation 14 of the 2022 Governance Report [exploiting the potential for synergy between ITC and other components of Islands Trust] that Trust Council *request staff to report back on the current situation, strengths and weaknesses, and options for addressing opportunities to improve synergy between Islands Trust Conservancy and Islands Trust operations*;
- L. That Trust Council not undertake any further work on the following recommendations of the 2022 Governance Report:
 - recommendation 2 [Number of Committees and Committee Mandates];

- recommendation 9 [First Nations Representation], pending the outcome of the request of the Province to review the Islands Trust governance structure;
- recommendation 10 [Provincial Representation] pending the outcome of the request of the Province to review the Islands Trust governance structure' and
- recommendation 15 [Trustee Compensation], pending the Trustee Remuneration Policy review.

M. That Trust Council request staff to prioritise in order these recommendations:

- G [secretary to Trust Council],
- H [adoption of comprehensive, multi-year planning document], and
- F [helping trustees fulfil their roles],

with the understanding that recommendations:

- A [election of Trust Council leadership],
- B [committee membership],
- C [committee mandates],
- D [roles of committees], and
- E [helping trustees understand their roles]

will be undertaken by staff as appropriate, and recommendations:

- I [communications and engagement],
- J [management alignment with Trust Council] and
- K [exploiting the potential for synergy between Islands Trust Conservancy and Islands Trust]

will be undertaken when prioritised by Trust Council.

7. CLOSED MEETING (If needed)

8. RISE AND REPORT

9. NEW BUSINESS

10. NEXT MEETING

The next Committee of the Whole meeting is scheduled to be held electronically on May 29, 2025 at 1:00 p.m.

11. ADJOURNMENT

DRAFT

Judy Gedye, Acting Chair

Certified Correct:

Lisa Millard, Meeting Administrator/Recorder

Meeting minutes are not official until adopted at a subsequent meeting.

ISLANDS TRUST COUNCIL
COMMITTEE OF THE WHOLE
RESOLUTION WITHOUT MEETING

RESOLUTION WITHOUT MEETING NO. TC-COW-RWM-2025-004

Pursuant to Trust Council RWM policy, the following resolution is considered urgent and cannot wait until the next regular business meeting:

- Cancel the May 29, 2025 Committee of the Whole meeting

Trustees were notified, via email, of the call for resolution on May 15, 2025.

Trustees were notified, via email, of the call for the vote on May 15, 2025.

It was Moved by Trustee Peterson and Seconded by Trustee Allen,
that Trust Council request staff cancel the May 29, 2025 Committee of the Whole meeting.

<u>TRUSTEES CONTACTED</u>	<u>DATE VOTE RECEIVED</u>	<u>VOTE</u>
1. Alex Allen	May 15, 2025	In Favour
2. Laura Patrick	May 15, 2025	In Favour
3. David Maude	May 15, 2025	In Favour
4. Joe Bernardo	May 15, 2025	In Favour
5. Lee Middleton	May 15, 2025	In Favour
6. Sue Ellen Fast	May 15, 2025	In Favour
7. Judi Gedye	May 15, 2025	In Favour
8. Tim Peterson	May 15, 2025	In Favour
9. Jeanine Dodds	May 15, 2025	In Favour
10. Sam Borthwick	May 15, 2025	In Favour
11. Tobi Elliott	May 15, 2025	In Favour
12. Mikaila Lironi	May 15, 2025	In Favour
13. Kate-Louise Stamford	May 15, 2025	In Favour
14. Mairead Boland	May 15, 2025	In Favour
15. Deb Morrison	May 15, 2025	Opposed
16. Ken Hunter	May 15, 2025	In Favour
17. Susan Yates	May 15, 2025	In Favour
18. Kristina Evans	May 15, 2025	In Favour
19. Dag Falck	May 16, 2025	In Favour
20. Peter Luckham	May 20, 2025	In Favour

TRUSTEES VOTE NOT AVAILABLE

1. Aaron Campbell
2. Lisa Gauvreau
3. David Graham
4. Jamie Harris
5. Ben Mabberley
6. Grant Scott

FINAL VOTE COUNT (19) IN FAVOUR (1) OPPOSED

DECISION: CARRIED

THE CHAIR DECLARED THE ABOVE RESOLUTION CARRIED PURSUANT TO SECTION 13 OF THE *ISLANDS TRUST ACT* ON MAY 20, 2025.

CHAIR'S SIGNATURE

RECORDER'S SIGNATURE

ISLANDS TRUST COUNCIL
COMMITTEE OF THE WHOLE
RESOLUTION WITHOUT MEETING

RESOLUTION WITHOUT MEETING NO. TC-COW-RWM-2025-005

Pursuant to Trust Council RWM policy, the following resolution is considered urgent and cannot wait until the next regular business meeting:

- Cancel the June 6, 2025 Committee of the Whole meeting

Trustees were notified, via email, of the call for resolution on June 5, 2025.

Trustees were notified, via email, of the call for the vote on June 5, 2025.

It was Moved by Trustee Fast and Seconded by Trustee Maude,
that Trust Council request staff cancel the June 6, 2025 Committee of the Whole meeting.

<u>TRUSTEES CONTACTED</u>	<u>DATE VOTE RECEIVED</u>	<u>VOTE</u>
1. David Maude	June 5, 2025	In Favour
2. Sue Ellen Fast	June 5, 2025	In Favour
3. Ken Hunter	June 5, 2025	In Favour
4. Kristina Evans	June 5, 2025	In Favour
5. Susan Yates	June 5, 2025	In Favour
6. Alex Allen	June 5, 2025	In Favour
7. Mairead Boland	June 5, 2025	In Favour
8. Tim Peterson	June 5, 2025	In Favour
9. Jeanine Dodds	June 5, 2025	In Favour
10. Joe Bernardo	June 5, 2025	In Favour
11. Sam Borthwick	June 5, 2025	In Favour
12. Laura Patrick	June 5, 2025	In Favour
13. Lisa Gauvreau	June 5, 2025	In Favour
14. Judi Gedy	June 5, 2025	In Favour
15. Deb Morrison	June 5, 2025	In Favour
16. Lee Middleton	June 6, 2025	In Favour
17. Kate-Louise Stamford	June 6, 2025	In Favour

TRUSTEES VOTE NOT AVAILABLE

1. Aaron Campbell
2. Tobi Elliott
3. Dag Falck
4. David Graham
5. Jamie Harris
6. Mikaila Lironi
7. Peter Luckham
8. Ben Mabberley
9. Grant Scott

FINAL VOTE COUNT (17) IN FAVOUR (0) OPPOSED

DECISION: CARRIED

THE CHAIR DECLARED THE ABOVE RESOLUTION CARRIED PURSUANT TO SECTION 13 OF THE *ISLANDS TRUST ACT* ON JUNE 6, 2025.

CHAIR'S SIGNATURE

RECORDER'S SIGNATURE

Follow Up Action Report

Committee Of The Whole

Progress	Activity	Responsibility	Dates	Status
100%	1 Staff to advise Executive Committee that Committee of the Whole recommend Executive Committee direct staff to produce a short summary of the Committee of the Whole meeting of May 6 for public release.		Meeting: 06-May-2025 Target: 16-May-2025	Completed



REQUEST FOR DECISION

To: Committee of the Whole

For the Meeting of: July 2, 2025

From: Trust Area Services

Date Prepared: June 24, 2025

SUBJECT: Policy Statement Amendment Project (PSAP) – Policy Statement Bylaw

RECOMMENDATION: That Committee of the Whole recommend to Executive Committee that it forward the draft new Policy Statement to Islands Trust Council for consideration of First Reading.

CHIEF ADMINISTRATIVE OFFICER COMMENTS: Adopting a new Policy Statement for the Islands Trust is one of the highest priorities in Trust Council's 2025-2028 Strategic Plan. The Policy Statement Amendment Project (PSAP) has been underway since 2019. Development of the draft new Policy Statement attached considered the feedback received from Island residents, Indigenous Governing Bodies, government agencies and local organizations. Between May 2024 and present, Committee of the Whole (CotW) and Trust Programs Committee (TPC) have met 15 times to discuss, receive information, and improve the draft new Policy Statement. Forwarding the draft new Policy Statement to Trust Council is not the end of the process, but rather an incremental step forward, opening the way for a new phase of public engagement and referrals to Indigenous Governing Bodies, government agencies and local organizations.

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- 1 **PURPOSE:** The purpose of this request for decision (RFD) is to provide CotW with an updated version of the draft new Policy Statement for consideration of forwarding to Trust Council for First Reading.
 - 2 **BACKGROUND:** At its meeting of March 2024, Trust Council amended its meeting procedures bylaw to enable CotW to convene to consider and revise the draft Policy Statement. At its meeting of March 2025, Trust Council returned that responsibility to Trust Programs Committee (TPC). TPC has now completed its review, and the draft bylaw is being brought back to CotW for a final look before it goes to Trust Council for consideration of first reading.

- 3 **IMPLICATIONS OF RECOMMENDATION**

ORGANIZATIONAL: None

FINANCIAL: None

POLICY: Will further the development of a new Policy Statement.

IMPLEMENTATION/COMMUNICATIONS: Staff will prepare Trust Council agenda materials and trustee speaking notes in anticipation of Trust Council's consideration of First Reading.

FIRST NATIONS RELATIONS: The draft new Policy Statement has been developed and revised to address many of the questions and comments raised by Indigenous Governing

Bodies up to this point in the project. However, these changes have not been workshopped with those Indigenous Governing Bodies, and staff anticipate further discussions and potential revisions following bylaw referral.

OTHER: None.

4 RELEVANT POLICY(S):

[Islands Trust Policy 1.3.1](#) – Policy Statement Implementation

[Islands Trust Policy 1.2.1](#) – Policy Statement Amendment

5 ATTACHMENT(S):

1) Draft Bylaw No. 183 – Islands Trust Policy Statement, redlined to May 29, 2025

2) Indigenous Governing Bodies Engagement Summary, June 2025

This table contains a summary of all feedback received from Indigenous Governing Bodies over the course of the Policy Statement Amendment Project and describes how that feedback was, or was not, addressed in the document.

3) What we Heard/What We Did, June 2025 - Draft

Staff have attached a draft updated “What we Heard/What we Did” table. This table was originally produced in 2024 based on feedback received during PSAP Phase 3 public engagement in 2022. Staff have updated it to illustrate how the current draft of the Policy Statement does, or does not, address the major themes identified by community members in earlier community engagement.

RESPONSE OPTIONS

Recommendation:

That Committee of the Whole recommend to Executive Committee that it forward the draft new Policy Statement to Islands Trust Council for consideration of First Reading.

Alternative:

COTW may determine there are additional revisions it wishes to make to the draft new Policy Statement before forwarding it to Trust Council. If this is the case, COTW could pass the following resolution:

That COTW revise the draft new Policy Statement as follows:

- By
- By

After making any additional changes to the draft new Policy Statement, COTW could then resolve to recommend to Executive Committee that it forward the draft new Policy Statement to the Islands Trust Council as amended for consideration of First Reading.

Prepared By: Jason Youmans, Senior Policy Advisor

Reviewed By/Date: Clare Frater, Director, Trust Area Services/June 24, 2025
Rueben Bronee, CAO/June 26, 2025



DRAFT FOR TRUST PROGRAMS COMMITTEE/TRUST COUNCIL

Islands Trust Policy Statement

Draft Bylaw No. 183

June 1, 2025

Proposed Revisions by Committee of the Whole/Trust Programs Committee made:

September 25, 2024
October 3, 2024
November 6, 2024
December 12, 2024
January 8, 2025
February 6, 2025

February 21, 2025
April 2, 2025 (TPC)
April 16, 2025 (TPC)
April 29, 2025 (TPC)
May 7, 2025 (TPC)
May 29, 2025 (TPC)

For Committee of the Whole meeting of July 9, 2025

Acknowledgement

Islands Trust Council respectfully acknowledges that the lands and waters that encompass the Islands Trust Area have been home to Indigenous Peoples since time immemorial and that their relationship to these lands and waters continues to this day. Islands Trust Council acknowledges that residential schools, forced removal, and colonial laws and restrictions ~~of~~on Indigenous governance and cultural practices have displaced and dispossessed Coast Salish peoples and disrupted their relationships with the islands and waters of the Salish Sea. Islands Trust Council acknowledges that a healthy environment is essential for Indigenous Peoples to be able to exercise their inherent and treaty rights. Islands Trust Council is committed to reconciliation and to working together to preserve and protect this ecologically, culturally, and spiritually significant region in the Salish Sea.

The Islands Trust Area is located within Coast Salish Territory, in the treaty lands and territories of:

- BOŖÉĆEN (Pauquachin) First Nation
- Da'naxda'xw/Awaetlala First Nation
- K'ómoks (Comox) First Nation
- Lhaq'temish (Lummi) Nation
- MÁLEXEŁ (Malahat) First Nation
- Mamalilikulla First Nation
- Qualicum First Nation
- Quw'utsun Nation (comprised of **Cowichan Tribes**, **Xeláltxw** (Halalt) First Nation, **Lyackson** First Nation, **Spune'luxutth'** (Penelakut Tribe) and **Stz'uminus** (Chemainus) First Nation
- scəwaθən (Tsawwassen) First Nation
- səlilwətał (Tsleil-Waututh) First Nation
- **SEMYOME** (Semiahmoo) First Nation
- **shíshálh** (Sechelt) Nation
- **Skwxwú7mesh** (Squamish) First Nation
- **Snaw-naw-as** (Nanoose) First Nation
- **Snuneymuxw** (Nanaimo) First Nation
- **Songhees** First Nation
- **SṪÁUTW** (Tsawout) First Nation
- ṭaʔəmen (Tla'amin) First Nation
- Tlowitsis Nation
- **Ts'uubaa-asatx** (Lake Cowichan) First Nation
- **Wei Wai Kum** (Campbell River) First Nation
- **We Wai Kai** (Cape Mudge) First Nation
- **W JOŁŁP** (Tsartlip) First Nation
- **W SIŖEM** (Tseycum) First Nation
- **Xwémalhkwa** (Homalco) First Nation
- **Xwsepsum** (Esquimalt) First Nation
- **xʷməθkʷəy̓əm** (Musqueam) First Nation

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Part 1: The Islands Trust Act

In 1974, the Government of British Columbia established the *Islands Trust Act* to preserve and protect the Islands Trust Area and its unique amenities and environment against unrestrained growth and development. Islands Trust is a federated body responsible for protecting the Islands Trust Area and its unique amenities and environment. The Islands Trust Area is comprised of 13 major islands and more than 450 smaller islands and the surrounding waters in the southern Strait of Georgia and Howe Sound. Islands Trust regulates local land use, works with other levels of government, and, through the Islands Trust Conservancy, protects places of natural or cultural significance.~~The Act establishes Islands Trust as a special-purpose provincial government agency equipped with a suite of land-use planning powers and a conservation-oriented mandate to preserve and protect the region in cooperation with others.~~ This unique governmental mandate was defined in Section 3 of the *Islands Trust Act* and is commonly referred to as the “Islands Trust Object.”

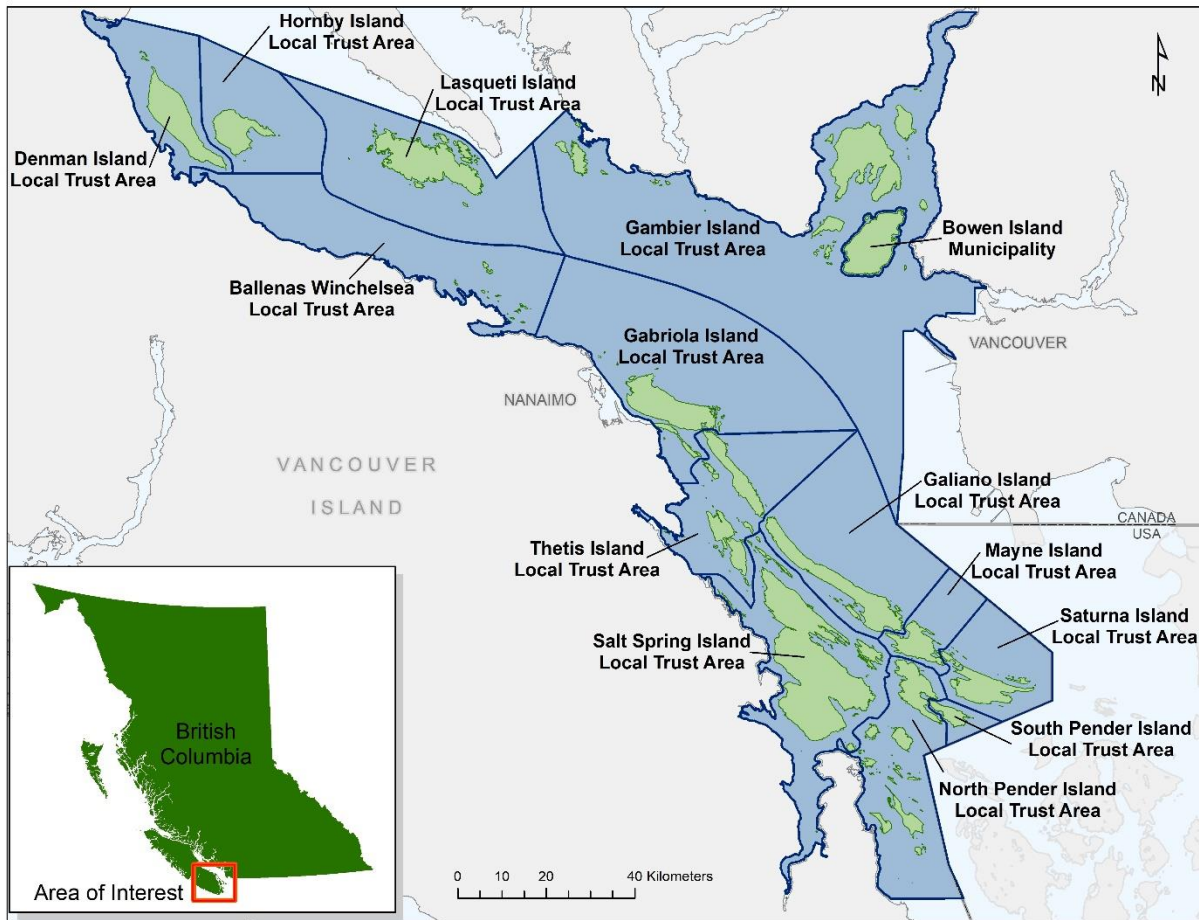
1.1 – The Islands Trust Object

“**The object of the trust** is to preserve and protect the Trust Area and its unique amenities and environment for the benefit of the residents of the Trust Area and of British Columbia generally, in cooperation with municipalities, regional districts, improvement districts, First Nations, other persons and organizations and the government of British Columbia.” (Section 3, *Islands Trust Act*)

1.2 – Map of the Islands Trust Area



This map is being replaced with the one below



NOTE: This map is a placeholder only. A new map of the Islands Trust Area will be created, identifying the boundaries of each local trust area and island municipality, and will include a legend, scale and recognition of the Indigenous Nations within whose territory Islands Trust operates

1.3 – Indigenous Inherent Rights Acknowledgment

Islands Trust Council respectfully acknowledges Indigenous inherent rights as protected under section 35 of the *Constitution Act, 1982*. Islands Trust Council respectfully acknowledges Indigenous rights to self-governance and the expressed interest of Indigenous Governing Bodies in working toward co-governance of the Islands Trust Area. Islands Trust Council is committed to advancing reconciliation with Indigenous Governing Bodies through ongoing discussion and recognition of these rights.

Given the *Declaration on the Rights of Indigenous Peoples Act* and the evolving legislative landscape in British Columbia, ~~this~~ bylaw the Policy Statement serves as a starting point for improved cooperation with Indigenous Governing Bodies. Islands Trust Council commits to an ongoing effort to co-develop planning and land use management processes with Indigenous Governing Bodies within the Islands Trust Area and acknowledges that this document does not serve as an endpoint. Islands Trust Council will be informed by the United Nations Declaration on the Rights of Indigenous Peoples as a framework for its approach to reconciliation.

1.4 – Purpose and Structure of the Policy Statement

~~Communications, Engagement, and Referrals:~~

Section 15 of the *Islands Trust Act* states that Trust Council must adopt, by bylaw, an Islands Trust Policy Statement that applies to the Islands Trust Area as a whole. The *Islands Trust Act* specifies that the Policy Statement must be a general statement of the policies of Trust Council to carry out the Islands Trust Object, that it may establish different policies for different parts of the Islands Trust Area, and that it must be approved by the provincial Minister responsible for Islands Trust prior to adoption.

~~The~~ Islands Trust Council is responsible for establishing and amending the Policy Statement, which in turn guides the development of more specific official community plans and regulatory bylaws by local trust committees and island municipalities across the region. The Act stipulates that official community plans and bylaws submitted to Executive Committee or Trust Council must not be approved 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.

The Policy Statement represents Trust Council's vision for the preservation and protection of the Islands Trust Area and its unique amenities and environment. It aspires to reflect the values and interests of island communities, Indigenous ~~government bodies~~ Governing Bodies and Indigenous Peoples, partner agencies, and all British Columbians, as well as the silent voices of island ecosystems, species at risk, and future generations.

Three Types of Policies in the Policy Statement:

1. **Guiding Principles** ~~(as listed in Part 2 of the Policy Statement)~~ are intended to establish general commitments of Trust Council that centre the Islands Trust Object in all daily decision-making across the Islands Trust Area by ~~Islands Trust bodies~~ Islands Trust Council, Islands Trust Executive Committee, local trust committees and island municipalities that are bound by the Policy Statement.
2. **Directive Policies** ~~(as listed in Part 3 of the Policy Statement)~~ are policies that are integral to carrying out the Islands Trust Object and that:
 - Local trust committees must address in the development of official community plans and/or regulatory bylaws, and amendments to those documents where relevant; and
 - Island municipalities must address in the development of an official community plan, and amendments to that document where relevant.

~~These are policies integral to carrying out the Islands Trust object.~~

3. **Advisory Policies** ~~(as listed in Part 3 of the Policy Statement)~~ are policies expressing select ~~goals-objectives~~ of Trust Council, that local trust committees and island municipalities are advised to ~~address-consider~~ in the development of official community plans, bylaws, and in discretionary land use decisions. Advisory policies are not intended to constitute a basis for Executive Committee or Trust Council review of local trust committee or island municipality bylaws, or for potential rejection of such bylaws.

All of the policies contained within the Policy Statement are interconnected and interrelate to each other in multiple ways. Therefore, the document should always be considered in its entirety to interpret its intended meaning and vision.

~~The policies in Part 3 have been included as they are considered by Trust Council to be important for preservation and protection of the Trust Area and its unique amenities and environment.~~

Part 2: Guiding Principles

In its decision making, Trust Council shall be guided by the following guiding principles:

2.1 – General Guiding Principles

In its efforts to carry out the Islands Trust Object, Islands Trust Council commits to the following set of shared principles ~~and priorities~~ to guide daily planning and decision making by ~~all bodies across the Islands Trust Area~~ Islands Trust Council, Islands Trust Executive Committee, local trust committees and island municipalities:

~~Trust Council commits to be guided by the following principles in its efforts to advance the Islands Trust Object:~~

Trust Council's Guiding Principles ~~and Priorities:~~

2.1.1	Acknowledge and Respect Indigenous Rights To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples, and to work together with Indigenous Governing Bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species.
2.1.2	Prioritize Environmental and Indigenous Cultural Heritage Protection To place priority on preserving, protecting and restoring the environment, and preserving, protecting, and supporting restoration of Indigenous cultural heritage in all decision making.
2.1.3	Limit the Rate and Scale of Development To define and maintain appropriate limits for the rate and scale of development in order to preserve and protect the Trust Area and its unique amenities and environment.
2.1.4	Foster Sustainable, Inclusive, and Resilient Communities To support planning and land use management decisions that foster sustainable, inclusive, and resilient communities, acknowledging the interdependencies between healthy communities and healthy ecosystems.
2.1.5	Take Guidance From the Precautionary Principle To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there may be uncertainty over the threats of serious or irreversible damage from development.
2.1.6	Account for Cumulative Effects To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats.
2.1.7	Foster Informed and Balanced Decision Making To be informed by a broad range of sources in its decision-making processes, including <u>Indigenous Knowledge, institutional knowledge, the best available science, Indigenous Knowledge, and local community knowledge, and science.</u>

2.2 – Reconciliation Principles

Islands Trust Council has declared its commitment to reconciliation with Indigenous Peoples of the Islands Trust Area, with the understanding that this commitment is a long-term relationship-building process.

Trust Council's Reconciliation Principles

Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area. . .

2.2.1	<u>Guidance from Truth and Reconciliation Commission</u> <u>Be informed by the 10 principles established by the Truth and Reconciliation Commission of Canada (TRC).</u>
2.2.2	<u>Guidance from United Nations Declaration on the Rights of Indigenous Peoples</u> <u>Be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).</u>
2.2.3	<u>Guidance from Missing and Murdered Indigenous Women and Girls Calls for Justice</u> <u>Be informed by the principles for change used by the National Inquiry into Missing and Murdered Indigenous Women and Girls.</u>
2.2.4	<u>Guidance from Indigenous Governing Bodies</u> <u>Be informed by guidance from Indigenous Governing Bodies and Indigenous Knowledge Holders.</u>

2.2.3 – Cooperation Principles

While Trust Council must provide the necessary leadership to carry out the Islands Trust Object, its mandate requires cooperation with partners who each have unique roles to play in preserving and protecting the region.

Trust Council commits to be guided by the following principles in its cooperation efforts to advance the Islands Trust Object:

Trust Council's Cooperation Principles:	
2.23.1	<u>Collaborate with the Islands Trust Conservancy Board</u> To collaborate closely with, and be informed by, the Islands Trust Conservancy Board, particularly in the areas of science-based conservation planning, ecosystem mapping, identification of core conservation areas and protected area networks, and protection of species and ecosystems at risk.
2.3.2	<u>Collaborate with Island Municipalities</u> <u>To collaborate with island municipalities, particularly in the areas of conservation planning, communications and engagement, the Policy Statement, and other areas supporting the Islands Trust Object.</u>
2.23.3 2	<u>Work Towards Collaborative Governance with Indigenous Governing Bodies</u> To work towards building strong relationships and foundations for collaborative governance with Indigenous Governing Bodies, including through the development of shared decision-making agreements under the <i>Declaration on the Rights of Indigenous Peoples Act</i> .
2.23.4 3	<u>Work Towards Strategic Inter-Agency Coordination</u> To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.
2.23.5 4	<u>Work Towards Accessible and Inclusive Public Communications and Engagement</u> To work towards accessible and inclusive public communications and engagement strategies that engage a wide range of Islands Trust Area residents, communities, local organizations, and British Columbians.
2.23.6 5	<u>Provide Public Education Opportunities</u> To provide education opportunities to Islands Trust Area residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the Trust Area and its unique amenities and environment, while respecting the confidentiality interests of Indigenous Peoples Knowledge Holders and Indigenous Governing Bodies.

2.3 – Reconciliation Principles

~~Trust Council has declared its commitment to reconciliation with Indigenous Peoples of the Islands Trust Area, with the understanding that this commitment is a long-term relationship building and healing process.~~

Trust Council's Reconciliation Principles:

~~Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area,~~

2.3.1	Guidance from Truth and Reconciliation Commission Be informed by the 10 principles established by the Truth and Reconciliation Commission of Canada (TRC).
2.3.2	Guidance from United Nations Declaration on the Rights of Indigenous Peoples Be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
2.3.3	Guidance from Missing and Murdered Indigenous Women and Girls Calls for Justice Be informed by the principles for change used by the National Inquiry into Missing and Murdered Indigenous Women and Girls.

Part 3: ~~Objectives~~ Goals, ~~and~~ Directives and Advisory -Policies

Objective-Goal 1:

Advancing ~~Advance~~ Reconciliation

Islands Trust Council is committed to reconciliation and to long-term ~~healing and~~ relationship building with Indigenous Governing Bodies and Indigenous Peoples across the region. The policies in this section aim to acknowledge the history and legacy of Indigenous Peoples in the area since time immemorial, to recognize and respect the interests of Indigenous Governing Bodies regarding planning and land use management decisions that impact their territories, and to build foundations for collaborative governance and shared decision making.

Directive Policies - Reconciliation

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.1.1 Cooperate with Indigenous Governing Bodies

Engage with Indigenous Governing Bodies and provide a record of the engagement at time of bylaw submission.

Advisory Policies - Reconciliation

Local trust committees and island municipalities should . . .

3.1.2 Cooperate with Indigenous Governing Bodies

Engage with Indigenous Governing Bodies on discretionary planning and land use management decisions ~~that may have potential significant impacts on Indigenous Governing Bodies' territories or the ecological health of the Islands Trust Area.~~

3.1.3 Land Back

Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies as an amenity contribution in applications seeking additional development potential.

3.1.4 Respect Indigenous Protocols for Information and Data Provided

Respect Indigenous Governing Bodies' and Indigenous Knowledge Holders' protocols about how their data and information should be collected, protected, used and shared.

Objective-Goal 2:

~~Preserving~~ Preserve and ~~Protecting~~ Indigenous Cultural Heritage and Culturally Significant Areas, Sites, and Species

This objective advances Guiding Principle 2.1.2 [Prioritize Environmental and Indigenous Cultural Heritage Protection]. ~~Islands~~ Trust Council recognizes Indigenous cultural heritage as a unique amenity in the Islands Trust Area that must be preserved, protected, and where possible, restored. The Islands Trust Area is home to many culturally significant areas, sites, and species of importance to present and future generations of Indigenous Peoples. This section lays out general types of Indigenous cultural heritage and culturally significant areas, sites, and species that should be identified and protected in each local planning area; this should be guided by Indigenous Peoples, Indigenous ~~G~~governing ~~B~~bodies and Indigenous Knowledge Holders and undertaken in a culturally sensitive manner that respects confidentiality protocols around the sharing of Indigenous Knowledge, and that many of these places are the resting places of ancestors.

Directive Policies - Indigenous Cultural Heritage & Culturally Significant Areas, Sites and Species

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.2.1	Indigenous Cultural Heritage Sites Address-Minimize potential <u>adverse</u> impacts to Indigenous cultural heritage sites including, but not limited to, known-identified village sites, burial sites, <u>camp sites</u> , middens, cairns, petroglyphs, culturally modified trees, fish traps, clam gardens, and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.
3.2.2	Indigenous <u>Marine</u> Harvesting Areas Address-Minimize potential <u>adverse</u> impacts to known-Indigenous-marine harvesting areas <u>used by Indigenous Peoples, on-land-and-marine-foreshores</u> including, but not limited to, fish weirs and clam gardens.
3.2.3	<u>Indigenous Harvesting and Hunting Areas</u> <u>Minimize potential adverse impacts to land-based harvesting and hunting areas used by Indigenous Peoples.</u>

Advisory Policies - Indigenous Cultural Heritage & Culturally Significant Areas, Sites and Species

Local trust committees and island municipalities should . . .

3.2.34	Indigenous Cultural Heritage Sites Through engagement with Indigenous Governing Bodies, identify and protect-prioritize protection of Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, <u>camp sites</u> , middens, cairns, petroglyphs, culturally modified trees, fish traps, clam gardens, and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.
3.2.45	Indigenous Harvesting Areas Through engagement with Indigenous Governing Bodies, identify and <u>prioritize protection of</u> protect Indigenous harvesting areas on land and marine foreshores including, but not limited to, fish weirs, clam gardens, camas meadows, and other areas used for Indigenous hunting, fishing, trapping, and gathering of plants and medicines.
3.2.6	<u>Indigenous Harvesting and Hunting Area Access</u> <u>Through engagement with Indigenous Governing Bodies, identify and pursue opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas.</u>

3.2.75	Other Culturally Significant Areas for Indigenous Peoples Through engagement with Indigenous Governing Bodies, -identify and <u>prioritize protection of</u> protect areas of importance for Indigenous cultural <u>and</u> , spiritual, medicinal and ceremonial practices <u>and</u> gathering areas.
3.2.86	Culturally Significant Species and Medicinal Plants Through engagement with Indigenous Governing Bodies, identify and , <u>prioritize protection</u> , protect and support restoration of culturally significant species and medicinal plants <u>and</u> ochre.
3.2.9	Cultural Monitors <u>Through engagement with Indigenous Governing Bodies, support opportunities for cultural monitors to be present for ground-disturbing activities.</u>

Objective-Goal 3:

~~Preserving~~Preserve and ~~Protecting~~ Healthy and Biodiverse Ecosystems

~~This objective advances Principle 2.1.2 [Prioritize Environmental Protection].~~ Islands Trust Council acknowledges that preserving and protecting the ecological integrity of the Islands Trust Area is essential to the Islands Trust Object and to supporting community well-being across the region. The policies in this section aim to identify and protect key ecosystem types and characteristics that safeguard biodiversity ~~(excluding invasive species)~~ and promote resilience to climate change.

Directive Policies - Ecosystem Integrity

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.3.1	Protected Area Networks Identify, establish, and maintain <u>sustain</u> a network of protected areas of sufficient size and distribution to preserve the environmental integrity of ecosystems in their planning area.
3.3.2	Sensitive Ecosystems Identify and prioritize the preservation, protection, and restoration of sensitive ecosystems in the Islands Trust Area, classified as the following ecosystem types: cliff; freshwater; herbaceous; old and mature forest; riparian; wetland; and woodland.
3.3.3	Forest Ecosystems Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forest ecosystems, <u>with a</u> with a particular focus on <u>the maintenance and restoration of their ecological integrity.</u> remaining stands of relatively undisturbed Coastal Douglas fir, Western redcedar, Arbutus, Garry oak, and Coastal Western Hemlock and their associated ecosystems.
3.3.4	Coastal Oak and Prairie Ecosystems <u>Identify and prioritize the preservation and protection of coastal oak and prairie ecosystems, with a particular focus on their maintenance, restoration and management of their ecological integrity.</u>
3.3.5	Watershed Ecosystems Identify and prioritize the preservation, protection, and restoration of watershed ecosystems, freshwater sources, and groundwater recharge areas.
3.3.6	Marine Shorelines and Nearshore Areas Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.

3.3.7	Critical Habitat for Species at Risk Identify and prioritize the preservation, protection, and restoration of critical habitat for species at risk.
3.3.8	Islets and Small Islands Identify and prioritize the preservation, protection, and restoration of relatively undisturbed islets and small islands.
3.3.9	Light Pollution <u>Minimize light pollution through the application of dark sky principles.</u>

Advisory Policies - Ecosystem Integrity

Local trust committees and island municipalities should . . .

3.3.10	Indigenous Ecosystem Management <u>Through engagement with Indigenous Governing Bodies, support opportunities for Indigenous-led ecosystem management.</u>
3.3.11	Indigenous Protected and Conserved Areas <u>Support Indigenous Governing Bodies in the establishment of Indigenous Protected and Conserved Areas.</u>

Objective Goal 4:

Fostering Sustainable, Inclusive, and Resilient Communities

This objective advances Principle 2.1.2 [Limit the Rate and Scale of Growth and Development], and Principle 2.1.4 [Foster Sustainable, Inclusive, and Resilient Communities]. Islands Trust Council recognizes that the Islands Trust Object is for the benefit of residents of the Islands Trust Area and all British Columbians, who in turn have a role in preserving and protecting this region. The policies in this section support the preservation and protection of unique island character and aim to foster sustainable, inclusive, and resilient island communities.

Directive Policies - Managing Growth and Development

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.4.1	Sustainable Development <u>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. Ensure development is compact, energy efficient, and appropriately situated on the island and on the site in order to: reduce dependency on private automobile use, and support increased 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.</u>
3.4.2	Growth Management Density Limits <u>Establish appropriate density limits for efficient and sustainable use of the land base that help to safeguard protected area networks, and is compatible with preservation and protection of the Trust Area and its unique amenities and environment. Manage community growth and its associated impacts by directing residential, commercial and industrial development and mixed use development into appropriate suitable locations, to prevent sprawl and minimize fragmentation of forest lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas. relieve growth pressures in the surrounding rural areas, and to help safeguard protected area networks.</u>

3.4.3	Impacts of Development Consider the aesthetic, environmental, and social impacts of development.
3.4.4	Community Facilities and Services Ensure that each community's <u>and local Indigenous communities'</u> current and projected long-term needs for educational, institutional, community, health, cultural, and recreational facilities and services <u>and outdoor recreation</u> are considered and planned for.
3.4.5	Climate Change Mitigation and Adaptation Identify and encourage adoption of <u>Implement</u> planning and land use management strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.
3.4.6	Hazardous Areas Identify areas at elevated risk of natural and climate change-related hazards and restrict development within these areas including, but not limited to, areas subject to flooding, sea-level rise, erosion, slope instability and wildfire. -with consideration of climate change, areas hazardous to development activities, including, but not limited to, areas subject to flooding, erosion, wildfire, or slope instability, and direct development away from such hazards.
3.4.7	Economic Activities Support <u>sustainable</u> economic activities that are compatible with the preservation and protection of the Trust Area and its unique amenities, environment, <u>community health</u> , and community character <u>that consider transportation and infrastructure capacity.</u>
3.4.8	Community Heritage Sites Identify, preserve, protect, and support the restoration of community heritage sites.

Advisory Policies – Managing Growth and Development

Local trust committees and island municipalities should...

3.4.9	Existing Development Potential <u>Identify land where existing development potential is not suitable and consider policy and/or regulatory options to reduce development potential or minimize the impacts of future development.</u>
3.4.10	Economic Development Opportunities for Indigenous Communities <u>Through engagement with Indigenous Governing Bodies, support economic development opportunities for Indigenous communities.</u>

Directive Policies - Housing

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.4.911	Appropriate Suitable Locations for Additional Housing Identify appropriate suitable locations where density increases that could support <u>increased density for</u> the development of safe, secure, diverse, and <u>affordable attainable</u> housing while reducing dependency on private automobile use, and increasing use of trail systems, public transportation, and active transportation, and without adversely impacting the Trust Area and its unique amenities and environment.
3.4.12	Housing Diversity <u>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</u>

3.4.13	<u>Clustered Small Dwelling Units</u> <u>Support alternatives to conventional single-detached dwellings by establishing policies to permit clusters of small dwelling units in suitable areas.</u>
3.4.10	<u>Short Term Rentals</u> <u>Identify and assess the impacts of short term rentals of dwellings on the availability of safe, secure, and affordable housing and, where necessary, regulate and limit the number of short term rentals accordingly.</u>
3.4.141 4	<u>Floor Area and Lot Coverage Limits</u> <u>Determine appropriate floor area and lot coverage limits for residential development to minimize negative environmental impacts, including on land used for agricultural purposes. Determine appropriate floor area and lot coverage limits for residential development to minimize greenhouse gas emissions and cumulative impacts to the Trust Area and its unique amenities and environment, including impacts on agricultural land.</u>
3.4.15	<u>Affordable and Special Needs Housing</u> <u>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.</u>
3.4.16	<u>Short-Term Rentals</u> <u>Identify and assess the impacts of short-term rental of dwellings on the availability of safe, secure and affordable housing and, where necessary, regulate and limit the number of short-term rentals accordingly.</u>
3.4.12	<u>Housing Diversity</u> <u>Support housing agreements for affordable housing, and special needs housing.</u>

Advisory Policies - Housing

Local trust committees and island municipalities should...

3.4.13	<u>Housing Options</u> <u>Support a range of housing types and tenures, including rentals, co-operatives and other alternatives to fee simple ownership.</u>
3.4.17	<u>Housing for Indigenous People</u> <u>Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.</u>
3.4.18	<u>Multi-Unit Residential</u> <u>Implement land use regulations for affordable and special needs housing and other multi-unit residential development that allow for a range of potential configurations on the site to accommodate changing construction conditions, with form and character controlled through development permit areas.</u>
3.4.19	<u>Natural Building Materials and Techniques</u> <u>Encourage construction of buildings and structures using local natural building materials and techniques, and minimize barriers to their use.</u>

Directive Policies - Transportation

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.4.14 20	Public and Active Transportation Networks Identify and establish appropriately-situated, safe, comfortable, and equitable transportation networks, both on the islands and to the islands that reduce dependency on private automobile use, encourage electric vehicles <u>zero emission modes of transportation</u> , and support increased use of trail systems, public transportation, and active transportation.
3.4.15 21	Rural Roadways Identify and protect rural roadways, including scenic and/or heritage roads.

Advisory Policies - Transportation

Local trust committees and island municipalities should...

3.4.16 22	Road Systems Ensure that road location, design, construction, and road systems are compatible with preservation and protection of the Trust Area and its unique amenities and environment.
3.4.23	Transportation Network Vulnerabilities <u>Cooperate with relevant agencies to identify parts of the local transportation network at risk of damage or deterioration and participate in planning to address mitigation or infrastructure relocation where necessary.</u>

Directive Policies - Waste

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.4.17 24	Disposal of Waste <u>Where required, identify appropriate locations for waste transfer stations for the removal of waste from the Islands Trust Area on islands with vehicle ferry service that are compatible with the preservation and protection of the Trust Area and its unique amenities and environment.</u>
3.4.18 25	Septic Wastewater Disposal Systems Establish requirements for the location and siting of new septic wastewater disposal systems to mitigate adverse impacts on the Trust Area and its unique amenities and environment, <u>including with a focus on</u> Indigenous Peoples' cultural heritage sites and marine harvesting areas.

Directive Policies - Recreation

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.4.19 26	Preservation of Natural Heritage Identify, preserve, protect, and support the restoration of natural heritage sites.
3.4.20 27	Location and Types of Recreational Facilities Identify appropriate locations <u>for, and</u> types of, <u>and access to,</u> facilities for low-impact and active recreational activities, and discourage high-impact recreational facilities <u>activities</u> that may adversely impact the preservation and protection of the Trust Area and its unique amenities and environment.

3.4.21	Access to Recreational Facilities Identify appropriate locations, types, and safe public access to recreational facilities
3.4.22 28	Access to Community Marinas, Boat Launches, and Docks Identify <u>and support</u> safe public access <u>and routes</u> to community marinas, boat launches, and docks.
3.4.23 29	Access to Anchorages Identify appropriate and safe small-craft anchorage public-access locations.
3.4.24 30	Trail Systems Identify appropriate locations <u>for</u> , types <u>of</u> , and safe public access to public pedestrian, equestrian and bicycle trail systems to support active recreation that is compatible with preservation and protection of the Trust Area and its unique amenities and environment.
3.4.25 31	Public Shoreline Access Identify <u>new, and</u> protect <u>existing, and support the acquisition and protection of, areas providing</u> safe public access to marine shorelines and along marine shorelines that are appropriate for low-impact, public recreational use and do not adversely impact the Trust Area and its unique amenities and environment, <u>including Indigenous Peoples' identified cultural heritage sites and marine harvesting areas.</u>
3.4.32	Public Access to Public/Crown Land <u>Identify and support the acquisition and protection of public access and routes to publicly-owned lands.</u>
3.4.26 33	Destination Gaming Facilities Prohibit destination gaming facilities such as casinos and commercial bingo halls.

Objective-Goal 5:

Fostering Sustainable Stewardship of Lands and Waters

This objective advances Principle 2.1.3 [Limit the Rate and Scale of Growth and Development] and Principle 2.1.2 [Prioritize Environmental and Indigenous Cultural Heritage Protection]. Islands Trust Council recognizes that sustainable use of lands and waters in the Islands Trust Area is important to the long-term well-being and resilience of ecosystems in the Islands Trust Area and the communities that depend on them. This section lays out policies for sustainable land and water use that support the long-term health of ecosystems and sustainability of freshwater.

Directive Policies - Freshwater

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.1	Freshwater Sustainability Ensure that 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.
3.5.2	Freshwater Demand and Supply Projections Ensure that existing, anticipated, and seasonal water demand and water availability are considered.
3.5.3	Freshwater Self-Sufficiency Ensure that islands are self-sufficient in their supply of freshwater.

3.5.4	<u>Saltwater Intrusion</u> <u>Identify areas at elevated risk of saltwater intrusion and restrict development serviced by groundwater within these areas.</u>
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Advisory Policies - Freshwater

Local trust committees and island municipalities should ...

3.5.45	Freshwater Quality Ensure that freshwater quality is maintained or remediated.
3.5.56	Freshwater Uses Strive to ensure that freshwater use <u>water quality in lakes, streams and wetlands is maintained, and that freshwater use</u> is not to the detriment of other uses of the waterway such as fish and fish-amphibian habitat uses, Indigenous cultural and spiritual uses, <u>and</u> aesthetic and recreational uses, and the maintenance of water quality in lakes, streams, and wetlands.
3.5.7	Freshwater Storage <u>Encourage freshwater storage in groundwater regions where the quality or quantity of groundwater is likely to be inadequate or unsustainable.</u>

Directive Policies - Forest Lands

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.6 8	Forest Lands for Sustainable Management Maintain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the Trust Area and its unique amenities and environment.
3.5.7 9	Forest Lands and Road Systems Consider siting of roads and utility corridors to minimize the fragmentation of forest lands.
3.5.8 10	Forest Lands and Wildfire Risk Management 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 local planning area.

Directive Policies - Agricultural Lands

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.9 11	Protection of Agricultural Lands Identify and protect agricultural lands for current and future use consistent with the Agricultural Land Commission Act and its regulations for agricultural land within the Agricultural Land Reserve while considering downstream impacts, wildlife habitat, and adjacent properties.
3.5.10 12	Agriculture and Adjacent Properties Minimize any adverse impacts of land uses from adjacent properties on agricultural lands.

3.5.11 13	Agriculture and Road Systems Consider siting of roads and utility corridors to minimize fragmentation of agricultural lands.
3.5.12 14	Economic Viability of Farms Consider land uses and activities that support the economic viability of farms without compromising the agricultural capability of agricultural land or adversely impacting the Trust Area and its unique amenities and environment.

Advisory Policies - Agricultural Lands

Local trust committees and island municipalities should ...

3.5.13 15	Sustainable Agriculture Preserve, protect, and encourage sustainable farming and the sustainability of farming.
3.5.16	Food Security and Food Sovereignty <u>Support initiatives that advance food security and Indigenous food sovereignty.</u>

Directive Policies - Soil and Fill

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.14 17	Soil Removal and Deposit Foster the preservation, protection, and restoration of soils in the Islands Trust Area.
3.5.15 18	Soil and Fill from Middens and Foreshore Areas of Cultural Significance Prohibit alteration, removal or excavation of soil or fill from <u>all identified archaeological sites, including</u> middens or foreshore areas identified as culturally significant areas.

Directive Policies - Marine Shorelands

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.16 19	Aquaculture Tenures Direct commercial aquaculture tenures to appropriate locations that will not adversely impact areas <u>identified as culturally significant by Indigenous Governing Bodies, that provide critical habitat for species at risk, are of recreational significance of cultural, spiritual, archaeological, medicinal or recreational significance,</u> or established or designated upland land uses, anchorages or moorages.
3.5.17 20	Setbacks from the Sea Consider the <u>Incorporate</u> current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by the federal and provincial governments.
3.5.18 21	Soft Shoreline Protections Consider <u>Prioritize</u> and foster soft shoreline approaches first , such as those identified by the “Green Shores” program, to set requirements for shoreline preservation, and to mitigate erosion of shoreline and foreshore cultural heritage sites.

3.5.22	<u>Vessel Moorage</u> <u>Prohibit the moorage of vessels in sensitive marine areas, including, but not limited to, eelgrass meadows, kelp forests, forage fish spawning areas, estuaries and mud flats.</u>
3.5.19 23	Marinas Identify requirements for the location, size, and nature of marinas that are compatible with <u>the</u> preservation and protection of the Trust Area and its unique amenities and environment.
3.5.20 24	Sharing of Coastal Facilities Identify opportunities for the sharing of coastal facilities such as docks, wharves, floats, jetties, boat houses, board walks, and causeways.
3.5.21 25	Private-Marine Docks <u>Consider the cumulative effects of docks, and</u> Limit or prohibit new private docks in areas identified as culturally significant by Indigenous Governing Bodies and Indigenous Knowledge Holders, in areas that provide critical habitat for species at risk, and in areas of recreational significance; and consider the cumulative effects of docks.
3.5.26	<u>Marine Structures</u> <u>Limit or prohibit the construction of installation of breakwaters, groynes, rock weirs and jetties in marine areas that are not zoned for group wharfage, marine commercial or industrial use, or ferry terminals.</u>

Directive Policies — Emissions and Pollutants

Local trust committees and island municipalities shall, in the preparation of official community plans and amendments; and

Local trust committees shall, in the preparation of regulatory bylaws and amendments . . .

3.5.22 27	Emissions <u>and Pollutants</u> to Air, Land, and Water Regulate land use and development to reduce detrimental emissions <u>and pollutants</u> , including greenhouse gas emissions, to air, land, and water.
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Part 4: Implementation

4.1 – Policy Statement Implementation

Organizational Policy Alignment

Section 15 of the *Islands Trust Act* requires that Islands Trust Council must, by bylaw, adopt a trust policy statement that applies to the Islands Trust Area, and that this Policy Statement must be a general statement of the policies of Islands Trust Council to carry out the object of the Trust.

Section 4(1) of the *Islands Trust Act* confirms that the Trust Council, Executive Committee, local trust committees and Islands Trust Conservancy are continued for the purpose of carrying out the object of the Trust.

Islands Trust Council, Islands Trust Executive Committee, local trust committees and island municipalities are expected to take general policy direction from the Policy Statement to ensure that decisions and activities of the organization are for the purpose of carrying out the Islands Trust Object. The Policy Statement should form the basis of Islands Trust Council's strategic planning process. To ensure consistency between the Policy Statement and the activities of Islands Trust Council, Islands Trust Executive Committee, local trust committees and island municipalities, staff should reference the Policy Statement and its relevant sections in meetings, staff reports, work programs, inter-governmental agreements (including protocols, letters of understanding and memoranda of understanding) and responses to referrals from other agencies. All inter-governmental coordination agreements, external communications, and advocacy should be consistent with the principles and policies set out in the Policy Statement.

Statutory Bylaw Approval Process:

The main implementation mechanism to ensure that the Policy Statement is implemented in local planning and land use management decision making is the statutory bylaw referral process, as stipulated in the *Islands Trust Act*.

Executive Committee Approval: Under Section 15(4) of the *Islands Trust Act*, bylaws submitted to the Islands Trust Executive Committee must not be approved by the Executive Committee, or Trust Council, if they are contrary to or at variance with the Islands Trust Policy Statement.

Local Trust Committees: Under Section 27 (1) of the *Islands Trust Act*, a local trust committee must submit its bylaws to Islands Trust Executive Committee for approval before adoption. If Islands Trust Executive Committee returns a bylaw with requested changes or refuses to approve a bylaw, the local trust committee may refer the bylaw to Islands Trust Council for approval. A bylaw has no effect until it is approved by Islands Trust Executive Committee or Islands Trust Council. A bylaw adopting or amending an official community plan has no effect until it is approved by the Minister responsible for Islands Trust.

Island Municipalities: Under Section 38 (1) of the *Islands Trust Act*, the council of a municipality, all or part of which is in the Islands Trust Area, must submit official community plan bylaws to Islands Trust Executive Committee for approval before adoption. If Islands Trust Executive Committee returns a bylaw with requested changes or refuses to approve the bylaw, the municipality may refer it to Islands Trust Council for approval. If Islands Trust Council returns or refuses to approve a bylaw, the municipality may submit it to the Minister for approval. Bylaws have no effect until they are approved by Islands Trust Executive Committee, Islands Trust Council, or the Minister responsible for Islands Trust.

Executive Committee Approval: Under Section 15(4) of the *Islands Trust Act*, bylaws submitted to the Executive Committee must not be approved by the Executive Committee, or Trust Council, if they are contrary to or at variance with the Islands Trust Policy Statement.

Implementing Reconciliation

The main mechanism by which Islands Trust Council's commitment to Reconciliation will be implemented through the Policy Statement is the requirement for local trust committees and island municipalities to engage Indigenous Governing Bodies on official community plan and land use bylaw amendments set out in Directive Policy 3.1.1.

Additionally, the Policy Statement advises local trust committees and island municipalities to engage with Indigenous Governing Bodies on discretionary planning and land use management decisions, and on topics that need engagement with Indigenous Governing Bodies in order to be effectively addressed.

Policy Statement Implementation Plan

Prior to, or following the adoption of, a new Policy Statement, or amendments to it, Islands Trust Council should develop a plan to implement the Policy Statement. Execution of the Implementation Plan may inform the content of, or revisions to, the following documents:

- The Islands Trust Council Strategic Plan
- The Islands Trust Council Annual Budget
- The Policy Statement Implementation Policy
- Local trust committee and island municipality workplans
- Other documents as applicable

The Policy Statement Implementation Plan may guide the development of:

- A timeline to bring official community plans and land use bylaws into alignment with the Policy Statement
- A revised assessment tool that Islands Trust Executive Committee and Islands Trust Council can use to assess whether local trust committee and island municipality bylaws are contrary to or at variance with the Policy Statement
- Targets and indicators with which Islands Trust Council can monitor and evaluate implementation of the Policy Statement
- Annual monitoring and reporting activities
- Changes to existing Islands Trust Council policies, or new policies, to implement the Policy Statement
- Changes to existing Islands Trust Council agreements, or new agreements, with other levels of government, agencies, and Indigenous Governing Bodies, to implement the Policy Statement
- Communications regarding Policy Statement implementation
- Other implementation actions as applicable

Monitoring and Evaluation:

~~Trust Council will report on its progress in implementing the objectives contained in the Policy Statement each year through the Islands Trust Annual Report.~~

4.2 – Policy Statement Amendments

Policy Statement Amendment Projects:

At the beginning of each term, in conjunction with its strategic planning process, Islands Trust Council can identify any Policy Statement amendment tasks to be undertaken that term. Newly elected Islands Trust Councils will likely wish to engage with Indigenous Governing Bodies, and may wish to engage with other key partners and interested and affected parties across the Islands Trust Area to define priorities for Policy Statement amendments that term. Any topics that are not able to be addressed in a particular term could be noted on a “Policy Statement Amendment Topic Review Inventory” for consideration by Islands Trust Council at a later date. Once an amendment project is initiated, Islands Trust Council could assign the Executive Committee or a council committee the task of leading and coordinating the Policy Statement review and amendment project, with the support of other committees as appropriate. As part of its annual budget cycle, Islands Trust Council should consider allocating resources required for a Policy Statement amendment project, including for any related communications and engagement.

Communications, Engagement, and Referrals:

As soon as practicable after the initiation⁷ of a Policy Statement amendment process, ~~the assigned committee~~ Islands Trust Council should adopt a communications and engagement plan appropriate to the scope and scale of the amendment project.

Proposed Policy Statement amendments must be referred to regional district boards in the Islands Trust Area and should be referred to Indigenous Governing Bodies.

While there are no statutory requirements for public engagement or public hearings related to the Policy Statement, in cases where major amendments are being considered, Trust Council should inform and consult members of the public and relevant partner agencies. Engagement and referral partners could include, but would not be limited to: local trust committees and island municipalities; the Islands Trust Conservancy Board; residents and non-resident property owners in the Islands Trust Area; other residents of British Columbia; municipal councils, improvement district boards operating within the Islands Trust Area; relevant provincial government agencies; and other persons and organizations who would be interested and affected by the proposed Policy Statement amendments.

Legislative Process:

Adoption of a Policy Statement amendment bylaw occurs only after Trust Council has undertaken four readings of the proposed Policy Statement bylaw and received approval by the Minister responsible for Islands Trust. Policy Statement amendment bylaws become effective upon date of adoption and are not retroactive.

Implementation of Policy Statement Amendments:

~~Policy Statement amendment bylaws become effective upon date of adoption and are not retroactive. Following the adoption of Policy Statement amendments, Trust Council should in consultation with each local trust committee and island municipality develop a “Policy Statement Implementation Plan”. The Policy Statement Implementation Plan will set a timeline for official community plans and regulatory bylaw amendments to bring them into compliance with the amended Policy Statement. As part of its budget processes, Trust Council may allocate resources to support local trust committees and island municipalities to undertake this work.~~

Glossary of Terms

NOTE: The source references listed in this draft glossary would be removed prior to first reading and are included here solely for informational purposes during the amendment review process. Citations are not typically included in glossaries.

Aboriginal (see Indigenous Peoples)	This is a collective name for all of the original peoples of Canada and their descendants. The Constitution Act of 1982 specifies that the Aboriginal Peoples in Canada consist of three groups—First Nations, Inuit and Métis—with unique heritages, languages, cultural practices and spiritual beliefs. The term Aboriginal peoples should not be used to describe only one or two of the groups. Because Aboriginal peoples is the term used in Canada’s constitution, it has specific importance within a Canadian legal context. Other terms include Indigenous Peoples, Native Peoples, Original Peoples, or First Peoples. For our purposes, the term “Indigenous Peoples” is currently the preferred and most respectful term to use. (Source: Assembly of First Nations)
Active Recreation	Active recreation means recreation that is of a formal nature, often performed with specific people or teams, requires specialized equipment or prescribed places, sites or fields, but excludes recreation that primarily involves the use of a power-driven conveyance.
Archaeological Sites	Archaeological sites consist of the physical remains of past human activity. All archaeological sites in British Columbia are protected under the <i>Heritage Conservation Act</i> . This applies whether sites are located on public or private land, and whether the site is known or unknown. Protected archaeological sites may not be altered or changed in any manner without a permit. There are over 60,000 archaeological sites recorded in BC’s Provincial Heritage Register including the remains of village and other habitation sites, as well as resource procurement activities such as fishing weirs and culturally modified trees. These sites may date anywhere from recent times to 14,000+ years ago, and studies continue to uncover new information. (Source: BC Archaeology Branch)
Biodiversity	Biodiversity (biological diversity) is the variety of living things, including diversity within species (genetic diversity), diversity between species, and diversity of ecosystems. When biodiversity characteristics are assessed for any location or region, three attributes are considered: 1) composition (describes the parts of each biodiversity component in that area – e.g. habitat types, species present, genetic diversity within species); 2) structure (refers to the physical characteristics supporting that composition – e.g. size of habitats, forest canopy structure, etc.); 3) function (means the ecological and evolutionary processes affecting life within that structure – e.g. pollination, natural disturbances, predator-prey relationships). (Source: Biodiversity BC)
Colonialism	Colonizers are groups of people or countries that come to a new place or country and steal the land and resources from Indigenous peoples, and develop a set of laws and public processes that are designed to violate the human rights of the Indigenous peoples, violently suppress the governance, legal, social, and cultural structures of Indigenous peoples, and force Indigenous peoples to conform <u>with to</u> the structures of the colonial state. Historical and ongoing colonialism, including the dispossession of lands, has a deep and devastating impact on Indigenous people and communities. (Source: BC Addressing Racism Working Glossary; BC Office of the Human Rights Commissioner)
Community Heritage Site	A community heritage site is real property that is considered to be heritage property. (Source: Local Government Act)
Conservation	Actions, legislation, or institutional arrangements that lead to the protection or preservation of a given species, group of species, habitat, natural area, or property or areas of human heritage value or character.
Critical Habitat	Under the federal <i>Species at Risk Act</i> , critical habitat is the habitat that is necessary for the survival or recovery of listed extirpated, endangered, or threatened species, and that is identified as critical habitat in a recovery strategy or action plan. Extirpated species means a wildlife species that no longer exists in the wild in Canada, but exists elsewhere in the wild. Endangered species means a wildlife species that is facing imminent extirpation or extinction. Threatened species means a wildlife species that is likely to become an endangered species if nothing is done to reverse the factors leading to its extirpation or extinction. (Source: <i>Species at Risk Act</i>)

Land Use Density and Intensity	Density is regulated through zoning. Density may be defined by the number of units per given area of land. Density may also be measured by dividing the built area including all floor area, by the total area of the lot, e.g., floor area ratio (FAR). <i>is an example</i> Intensity of use refers to the impacts of different types of land uses, e.g., certain types of commercial or industrial uses could be more intense with more impacts than residential or vice versa. Of note, density and intensity of use can combine to increase cumulative impacts of the land use.
Ecosystem	An ecosystem is a collection of communities of both living and non-living things that are connected. The biotic elements in an ecosystem include living things such as plants and animals. The abiotic elements found in an ecosystem include non-living things like land forms or climate. Healthy ecosystems provide important “services,” like clean air and water, healthy forests and farms, and habitat for plants and animals. (Source: Government of BC)
Ecosystem Integrity	Ecosystems have integrity when their native components, such as native species, biological communities, natural landscapes and ecological functions, are intact and are likely to persist. (Source: Government of Canada)
Environment	The components of the Earth, including: 1. land, water and air, including all layers of the atmosphere, 2. all organic and inorganic matter and living organisms, and 3. the interacting natural systems that include components referred to in paragraphs (a) and (b). (Source: Impact Assessment Agency of Canada)
Equity / Equitable	Equity refers to achieving parity in policy, process and outcomes for historically and/or currently underrepresented and/or marginalized people and groups while accounting for diversity. It considers power, access, opportunities, treatment, impacts and outcomes. (Source: Equity & Inclusion Glossary, UBC)
First Nations	First Nations is not a legal term but came into common use in the 1970s to replace Indian, which some people found offensive. Many communities have also replaced “band” with “First Nation” in their names. Symbolically, the term elevates First Nations to the status of “first among equals” alongside the English and French founding nations of Canada. It also reflects the sovereign nature of many communities, and the ongoing quest for self-determination and self-government. First Nations people may live on or off reserve, they may or may not have legal status under the <i>Indian Act</i>, and they may or may not be registered members of a community or nation. “First Nations” should be used exclusively as a general term as community members are more likely to define themselves as members of specific nations or communities within those nations. (Source: Assembly of First Nations)
Groundwater Recharge Areas	Groundwater recharge areas are terrain that inherently provide geographical and ecological conditions for the infiltration of water from the land surface to the subsurface through soils, sediments, and fractured bedrock to replenish groundwater sources. Groundwater recharge areas can be <i>diffuse</i> where widespread precipitation on the landscape infiltrates into groundwater sources or <i>localized</i> where discrete surface water sources such as streams, lakes, septic fields, and/or irrigation fields infiltrate into groundwater sources. Groundwater recharge areas that have a significant groundwater recharging effect for drinking water sources or groundwater dependent ecosystems in the Islands Trust Area are defined as <i>Critical Aquifer Recharge Areas</i>.
Groundwater Region	<u>A groundwater region is a defined geographic area characterized by shared groundwater recharge, flow patterns, usage, and hydrogeological features, and that has clusters of wells that draw from common recharge zones. Analogous to surface-water watersheds – which are delineated based on drainage to a common outlet – groundwater regions are mapped to support the sustainable assessment, protection, and management of subsurface freshwater resources. Unlike surface watersheds, groundwater regions may span multiple watershed boundaries due to the complex movement of groundwater. These regions serve as practical planning units to guide evidence-based decisions regarding land use, water allocation, and ecosystem protection.</u>
Heritage Site	Heritage site means, whether designated or not, land, including land covered by water, that has heritage value to British Columbia, a community or an aboriginal people. (Source: BC Heritage Conservation Act)

Housing Diversity	<u>Housing diversity refers to the range of housing types and tenures in a community that allow people to find appropriate housing as their needs change over time, and at all stages of life.</u>
Inclusive / Inclusion	Inclusion is an active, intentional, and continuous process to address inequities in power and privilege, and build a respectful and diverse community that ensures welcoming spaces and opportunities to flourish for all. (Source: Equity & Inclusion Glossary, UBC)
Indigenous Cultural Heritage	Indigenous Peoples understand and describe cultural heritage according to their distinct perspectives, traditions, and languages. For Indigenous Peoples, cultural heritage refers to ideas, experiences, objects, artistic expressions, practices, knowledge, and places that are valued because they are culturally meaningful, connected to shared memory, or linked to collective identity. Indigenous cultural heritage cannot be separated from either Indigenous identity or Indigenous life. Indigenous cultural heritage can be inherited from ancestors or it can be created by people today as a legacy for future generations. Indigenous Peoples have a right to identify their own cultural heritage, interpret its meaning, and safeguard its value. (Source: Indigenous Heritage Circle)
Indigenous Governing Body	Indigenous Governing Body means an entity that is authorized to act on behalf of Indigenous peoples that hold rights recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> .
Indigenous Knowledge / Knowledge Holders	There is no single definition of Indigenous Knowledge. For the purposes of this document our purposes, we understand "Indigenous Knowledge" as a term that refers to a set of complex knowledge systems based on the worldviews of Indigenous peoples. Indigenous Knowledge reflects the unique cultures, languages, values, histories, governance and legal systems of Indigenous Peoples. It is place-based, cumulative and dynamic. Indigenous Knowledge systems involve living well with, and being in relationship with, the natural world. Indigenous Knowledge systems build upon the experiences of earlier generations, inform the practice of current generations, and evolve in the context of contemporary society. Different First Nations, Inuit and Métis communities each have distinct ways of describing their knowledge. Knowledge Holders are the only people who can truly define Indigenous Knowledge for their communities. It is important to note that some Indigenous communities are struggling to maintain their Indigenous Knowledge due to ongoing impacts of colonialism. (Source: Impact Assessment Agency of Canada)
Indigenous Peoples (see Aboriginal Peoples)	Indigenous Peoples has the same meaning as aboriginal peoples in section 35 of the <i>Constitution Act, 1982</i> . The Assembly of First Nations also states: There is no official definition of Indigenous Peoples. In part, Indigenous communities, peoples and nations can be described as those which, having a historical continuity with pre-invasion and pre-colonial societies that developed on their territories, consider themselves distinct from other sectors of the societies now prevailing on those territories. Other terms include Aboriginal Peoples, Native Peoples, Original Peoples, or First Peoples. (Source: Assembly of First Nations)
Indigenous Rights	The term 'Indigenous Rights' is to be interpreted in accordance with the Province of British Columbia's Distinctions-Based Approach Primer, December 2023.
Middens	Midden, or 'shell midden' archaeological sites are indicative of past First Nations settlement activity. Formed by the accumulation of stratified cultural deposits over thousands of years, shell midden sites represent some of the most complex archaeological sites in the world. Source: McLay et al (2008) <i>A'lhut tu tet Sul'hweentst Respecting the Ancestors</i> Note: A midden may be an archaeological indicator of village and burial sites, and may contain ancestral remains

<u>Natural Heritage Sites</u>	Natural heritage sites are natural areas that: • <u>Furnish outstanding examples of Earth’s record of life or its geologic processes;</u> • <u>Provide excellent examples of ongoing ecological and biological evolutionary processes;</u> • <u>Contain natural phenomena that are rare, unique, superlative, or of outstanding beauty; or</u> • <u>Furnish habitats for rare or endangered animals or plants or are sites of exceptional biodiversity.</u>
Nature-based solutions	Nature-based solutions are actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature. Nature-based Solutions address societal challenges through the protection, sustainable management and restoration of both natural and modified ecosystems, benefiting both biodiversity and human well-being. Nature-based Solutions are underpinned by benefits that flow from healthy ecosystems. They target major challenges like climate change, disaster risk reduction, food and water security, biodiversity loss and human health, and are critical to sustainable economic development. (Source: International Union for Conservation of Nature (IUCN))
Precautionary Principle	Principle 15 of the Rio Declaration, known as the precautionary principle, states: “In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.” Four central components of the precautionary principle include: taking preventive action in the face of uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making. (Source: <i>The Precautionary Principle in Environmental Science</i>, Kriebel et al., 2001)
Preservation	To maintain in a given condition. Preservation often requires maintaining the processes that generate the desired condition.
Protection	To maintain over the long term by managing, or if necessary limiting, the type and intensity of development or activity to ensure that valued attributes are not compromised or destroyed.
Reconciliation	Reconciliation is about establishing and maintaining a mutually respectful relationship between Aboriginal and non-Aboriginal peoples in this country. In order for that to happen, there has to be awareness of the past, an acknowledgement of the harm that has been inflicted, atonement for the causes, and action to change behavior. (Source: Truth & Reconciliation Commission)
Restoration	Restoration is the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecological restoration seeks to initiate or accelerate ecosystem recovery following damage, degradation, or destruction. (Source: Society for Ecological Restoration)
<u>Restrict</u>	<u>To confine, bound or limit, not necessarily prohibit.</u>

Sensitive Ecosystems	Sensitive ecosystems are classified as ‘sensitive’ because of their rarity and vulnerability to disturbances such as human impacts and climate change. The BC Sensitive Ecosystems Inventory identifies sensitive ecosystem types, which have been adapted by the Islands Trust Conservancy to identify sensitive ecosystems commonly found in the Islands Trust Area, including: <u>Cliff</u>: Steep slopes, often with exposed bedrock. Very little soil accumulation, and only exceptionally hardy trees and plants. Cliffs are important vegetation refugia because they are often inaccessible to deer browsing or livestock grazing and can be important nesting habitat for birds. <u>Freshwater</u>: all freshwater networks including but not limited to streams, lakes, wetlands, groundwater sources, springs, and precipitation⁵. <u>Herbaceous</u>: Shallow soils characteristic of herbaceous ecosystems support low-growing vegetation, such as grasses, forbs (low, broad-leaved plants), wildflowers, mosses and lichens. Few trees and shrubs survive on these sites due to the fast-drying and often shallow nature of the exposed soils. <u>Old and Mature Forest</u>: Dry to moist forests dominated by conifer or deciduous tree species with a canopy cover of over 30%. Old forests have a stand age of over 250 years.; Mature forests have a stand age of 80–250 years. <u>Riparian</u>: Located adjacent to lakes, streams and rivers and characterized by plant communities and soils dependent on increased moisture. Influenced by erosion, sedimentation, flooding and seepage. <u>Wetland</u>: Feature moisture-dependent plants that thrive in an environment where water remains at or above the surface of the soil during most of the year. <u>A wetland can be bog, fen, marsh, swamp, shallow water, wet meadow or a mixture of these types.</u> <u>Woodland</u>: Dry and open forests dominated by a mix of broadleaf and coniferous tree species with canopy coverage of 10–30%. Generally restricted to south-facing slopes and ridges with shallow soils and bedrock outcroppings. (Source: BC Sensitive Ecosystems Inventory, as adapted in Islands Trust Conservancy Regional Conservation Plan 2018-2027)
Species At Risk	An extirpated, endangered, threatened species, or a species of special concern. Extirpated species means a wildlife species that no longer exists in the wild in Canada, but exists elsewhere in the wild. Endangered species means a wildlife species that is facing imminent extirpation or extinction. Threatened species means a wildlife species that is likely to become an endangered species if nothing is done to reverse the factors leading to its extirpation or extinction. Species of special concern means a wildlife species that may become a threatened or an endangered species because of a combination of biological characteristics and identified threats. (Source: Federal <i>Species at Risk Act</i>)
Stewardship	Voluntary, cooperative actions that nurture and take responsibility for the long-term integrity of the environment and amenities in the Islands Trust Area. <u>For Indigenous Peoples, stewardship may be mandatory under Indigenous law.</u>
Sustainable	Capable of being maintained indefinitely; capable of meeting the environmental, economic, and social needs of current generations without compromising the ability of future generations to meet their needs.
Treaties / Treaty Nations	Treaties are constitutionally protected, government-to-government agreements that identify, define and implement a range of rights and obligations, creating long-term, mutually binding commitments. Treaties negotiated through the BC treaty negotiations process are tripartite agreements between the governments of Canada, British Columbia, and a First Nation. The goal of treaties is reconciliation. Treaties signed with First Nations in Canada between 1701 and 1923 are commonly referred to as historic treaties. In BC, there are Douglas treaties, signed with First Nations on Vancouver Island, and Treaty 8 covering a portion of northeastern BC. Treaties signed today are called modern treaties, and cover where there are no historic treaties, and can also deal with matters not addressed in historic treaties. (Source: BC Treaty Commission)
Watershed	<u>A watershed is a topographically-defined area where all precipitation – rainfall and snowmelt – flows downslope via surface or subsurface pathways to a common receiving water body such as a stream, wetland, lake, or the ocean. Due to the islands’ high shoreline-to-area ratio, many watersheds in the Islands Trust Area are non-basin watersheds the ephemeral flows and no defined channels or permanent receiving water bodies.</u>



Islands Trust

Policy Statement Amendment Project

First Nation comments on July 2021 and September 2023 versions of the draft Policy Statement

This table provides a reference sheet about input from First Nations on Drafts of the Policy Statement with staff comment.

Cowichan Tribes (see also below feedback provide verbally by Quw'utsun Nation members to Islands Trust staff)		
Text from September 2023 version	Cowichan Tribes comments	Comments from Islands Trust Staff
General Comments		
	As a general comment, as noted above [reference to section 1.4], and per BC's DRIPA legislation, BC has committed to implementing UNDRIP including bringing all provincial legislation into accordance with UNDRIP. This is not in contradiction of the Object itself, but rather strengthens the degree to which IT must engage meaningfully with Indigenous Peoples in order to achieve Free, Prior and Informed Consent within our territories. Both Guiding and Directive policies must incorporate the principles and articles of UNDRIP. Municipalities and IT are both bodies created through provincial legislation and thus are subject to implementation of UNDRIP as well.	Revisions made within the limits of existing legislation. To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that "Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)."

Part 1: The Islands Trust Act – 1.2 – Map of the Island Trust Area

	Realizing that this is a placeholder, there is no legend or scale (noting to ensure that these are on the updated map). Cowichan Tribes would be interested to see the new map referenced here. The new map should include recognition of the Indigenous Nations within whose territory Islands Trust operates. Additionally, it is important to bring forward that even though there are no Cowichan Tribes Indian Reserves on the Gulf Islands, they are part of Quw'utsun Nation territory	Staff have prepared a new map. At present it shows only local trust area boundaries. Staff are working on a second map that shows the names of the Indigenous Governing Bodies with treaty and territorial interests in the Trust Area. It does not show territorial boundaries due to the complexity of presenting overlapping and shifting boundaries. Staff would like to workshop the draft map with Indigenous Governing Bodies before including it in the Policy Statement.
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Part 1: The Islands Trust Act – 1.3 – Interpretations of the Islands Trust Object

Unique Amenities, Environment and Residents of the Trust Area	[Unique Amenities] A lot of this is referring to indigenous cultural heritage: "patterns of human occupation, heritage, gathering places, and culturally significant places." "Landforms, freshwater sources, plants, [and] animals" are also distinctly connected with Quw'utsun Mustimuhw relationships with the land and land management practices. All of this history, knowledge and heritage is skipped over with a description of our heritage and knowledge as signifying "pleasantness" and "charm", continuing the attempted erasure of our people from our territory and our relationships. If Islands Trust desires to highlight these "features", it makes much more sense to work with nations for a name in one of our languages to refer to our relations and our heritage. At the very least, the Quw'utsun Nation must be recognized in this	This section was removed. Principle 2.2.2 signals Trust Council intent to work towards the foundations of collaborative governance. The Policy Statement is a statement of the general policies of Islands Trust Council and is not an action plan.
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	section as the stewards of our territory - including listed features - and our cultural heritage must be recognized as our own. I understand that "unique amenities" is in the Islands Trust Act. Nevertheless, this definition should be expanded and should include the recognition that Islands Trust operates within Quw'utsun Nation territory. For example: The Islands Trust Area includes unique landforms, water sources and water bodies, plants, animals and culturally significant places within the territories of [First Nations or Indigenous Nations listed above], peoples who have cared for these lands and waters since time immemorial. These places include, but are not limited to, village sites, harvesting areas (on land, sea and intertidal areas) and spiritual places. Islands Trust commits to working in collaboration with [listed First Nations and Indigenous Nations] to care for these unique heritage and ecological values [Environment] Noting that there are culturally at-risk species as well, which may or may not be classified as species at risk under the federal act, but which may be uncommon, inaccessible or otherwise difficult for Quw'utsun people to acquire. Such species, and their habitats (including teachings around caring for and harvesting those species), are important to protect and ensure that Quw'utsun people have access to them.	
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	[Residents of Trust Area] How will Islands Trust work in collaboration with Cowichan Tribes and the Quw'utsun Nation with regards to shared decision making in our territory?	
Part 1: The Islands Trust Act – 1.4 –Purpose and Structure of Policy Statement		
“The Policy Statement represents Trust Council’s vision for the preservation and protection of the Islands Trust Area and its unique amenities and environment. It aspires to reflect the values and interests of island communities, Indigenous government bodies and Indigenous Peoples, partner agencies, and all British Columbians, as well as the silent voices of island ecosystems, species at risk, and future generations.”	This includes commitments to implement UNDRIP (which are also commitments made by the Province generally under DRIPA), the Provinces' Draft Principles that Guide the Province of BC's Relationship with Indigenous Peoples, TRC Calls to Action. While IT can aspire to reflect interests and values of British Columbians, an "aspiration" is not enough when it comes to working with Indigenous Peoples who have rights to self-determination. Free, Prior and Informed Consent MUST be obtained from Indigenous Peoples prior on any projects within our territories. This commitment structures the relationship between IT and Indigenous Nations, including the Quw'utsun Nation, of which Cowichan Tribes is a member community.	Revisions made within the limits of existing legislation. To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - “Indigenous Inherent Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”
Part 1: The Islands Trust Act – 1.4 –Two Types of Policies in the Policy Statement		
	As a general comment, as noted above, and per BC's DRIPA legislation, BC has committed to implementing UNDRIP including bringing all provincial legislation into accordance with UNDRIP. This is not in contradiction of the Object itself, but rather strengthens the degree to which IT must engage meaningfully	Revisions made within the limits of existing legislation. To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - “Indigenous Inherent Rights Acknowledgement” was added to the draft document.

	with Indigenous Peoples in order to achieve Free, Prior and Informed Consent within our territories. Both Guiding and Directive policies must incorporate the principles and articles of UNDRIP. Municipalities and IT are both bodies created through provincial legislation and thus are subject to implemented of UNDRIP as well	Several directive and advisory policies elsewhere in the document, including 3.1.1, 3,1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”
PART 2: Guiding Principles – 2.1.1 – Acknowledge and Respect Indigenous Rights		
To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples in decision making, and to work together with Indigenous governing bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species.	Working with Indigenous Nations as decision-makers within their territories: lands and waters in which Islands Trust operates. Quw'utsun Nation Chiefs are decision-makers in our lands and waters. Looking for a meaningful commitment to shared decision-making by IT, as per DRIPA commitments. For example, Islands Trust Council can approach Cowichan Tribes leadership to discuss on a government-to-government basis how we can acknowledge past wrongs and work together. There could be a formal agreement committing to shared decision making and a body to implement it.	Islands Trust Executive Committee has requested staff to work with Quw'utsun Nation on a protocol agreement, however this work is delayed. Cowichan Tribes/Quw'utsun Nation could also pursue a UN Declaration agreement with the Province concerning the Islands Trust.
PART 2: Guiding Principles – 2.1.2 – Prioritize Environmental Protection		
To place priority on preserving, protecting and restoring the environment in all decision making	With respect to and including Indigenous nations as decision-makers. Quw'utsun mustimuhw (people) have invaluable traditional ecological knowledge about our territory that informs our governance of the territory. Additionally, "preserving, protecting and restoring" must include space for the exercise of aboriginal	Draft principles 2.1.2 and 2.1.3 in Draft 2 were blended to reflect Cowichan Tribes' comments. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3,1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing

	rights, such as harvesting.	Bodies. Policies 3.2.2-3.2.7, 3.4.25 and 3.4.31 address protections for harvesting and/or hunting areas in support of continued exercise of Aboriginal rights.
PART 2: Guiding Principles – 2.1.3 – Prioritize Indigenous Cultural Heritage Protection		
To place priority on preserving, protecting and supporting restoration of Indigenous cultural heritage in all decision making.	Yes, but it should be explicitly stated that IT will work with Indigenous Nations who are the decision makers over our cultural heritage. We know how to protect and care for our cultural heritage.	Draft principles 2.1.2 and 2.1.3 in Draft 2 were blended to reflect Cowichan Tribes' comments. To address comments from Cowichan Tribes, other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that "Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)."

PART 2: Guiding Principles – 2.1.3 – Limit the Rate and Scale of Development

To define and maintain appropriate limits for the rate and scale of development in order to preserve and protect the unique amenities and environment	Yes. However, in considering and determining development, this must be done through meaningful engagement with Indigenous nations. Cowichan Tribes has an extreme housing crisis and we need to ensure that our members are housed. Municipalities and other such bodies, such as IT, must coordinate with Cowichan Tribes to account for our housing needs in their plans (for example, developing an OCP with the understanding that CT has housing needs that are not able to be fulfilled on reserve. So limits must include planning for a percentage of the allowed housing for CT and other First Nations as well as needs of the non-indigenous community.) Include working with the Quw'utsun Nation when developing limits for rate and scale of development to ensure that needs of indigenous and non-indigenous peoples are met	Draft policy 3.4.12 has been revised to read: Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> Draft advisory policy 3.4.17 says “Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.”
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PART 2: Guiding Principles – 2.1.5 – Foster Sustainable, Inclusive and Resilient Communities

To support land use planning decisions that foster sustainable, inclusive, and resilient communities, acknowledging the interdependencies between healthy communities and healthy ecosystems.	Land use planning must be done in a collaborative manner with Indigenous Nations. We are developing our own land use plans and must work together on this.	Principle 2.3.3 signals Trust Council intent to work towards the foundations of collaborative governance. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies.
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PART 2: Guiding Principles – 2.1.6 – Account for cumulative Effects		
To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats.	Delete "to strive to". Account for the cumulative effects...	"Strive to" has largely been eliminated from the draft Policy Statement. Where it remains, it is used in policy areas where not solely within the jurisdiction of the Islands Trust or, while within its jurisdiction, the authority is limited/constrained.
PART 2: Guiding Principles – 2.2.3 – Work Towards Strategic Inter-Agency Coordination		
To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.	including coordination and collaboration with Cowichan Tribes and the Quw'utsun Nation with regards to spill response and Guardians programs, for example	During day-to day Island Trust work it is anticipated that Cowichan Tribes and the Quw'utsun Nation will be invited to applicable inter-agency coordination forums.
PART 2: Guiding Principles – 2.3.6 – Provide Public Education Opportunities		
To provide education opportunities to Islands Trust Area residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the region's unique amenities and environment, while respecting the confidentiality interests of Indigenous Peoples and Indigenous governing bodies	Yes, but it could be included that working with Indigenous Nations around public education is needed. Public education is IT's responsibility but it is important that Indigenous history and culture are shared and respected, as shared and directed by the nation. In line with principles of OCAP (Ownership, Control, Access and Possession), recognizing the Quw'utsun Nation as a self-determining nation with regards to our knowledge - how it is shared, with whom it is shared.	Agreed.
PART 3: Guiding Principles – Table 1– Truth & Reconciliation Commission of Canada (TRC) – 10 Principles		
(B) First Nations, Inuit, and Métis peoples, as the original peoples of this country and as self-determining peoples, have Treaty, constitutional, and human rights that must be recognized and respected	Yes, but noting that only First Nations have aboriginal rights and title within the Gulf Islands.	The table of the TRC's 10 Principles has been deleted from the draft Policy Statement. Instead, the document is referenced in the general sense.

PART 2: Guiding Principles – Table 2 –Applicable UN Declaration on the Rights of Indigenous Peoples (UNDRIP) Articles		
First Nations, Inuit, and Métis peoples, as the original peoples of this country and as self-determining peoples, have Treaty, constitutional, and human rights that must be recognized and respected.	Please include also articles 3, 4, 10, 24 and 26. Of course, all UNDRIP articles apply per DRIPA, but it is important to include the recognition of Indigenous Nation's inherent right to self-determination. This underlies and gives support to the need for shared decision-making with regards to IT activities. Article 24 speaks to harvesting rights, rights protected as aboriginal rights under s.35. Cowichan people's harvesting rights, including access to harvesting places, must be protected.	The table of specific UNDRIP policies has been deleted from the draft Policy Statement. Instead, the document is referenced in the general sense.
PART 2: Guiding Principles – Table 1 – Principles for Change used by the National Inquiry into Missing and Murdered Indigenous Women and Girls		
Self-Determined and Indigenous Led Solutions and Services	Hope to see Islands Trust implement a commitment to the MMIWG Principle for Change: Self-Determined and Indigenous Led Solutions and Services (see page 6)	The table of specific policies from the MMIWG inquiry was deleted from the draft Policy Statement. Instead, the document is referenced in the general sense.
PART 3: Goals and Directive Policies – Goal 1 – Advancing Reconciliation		
This goal advances Guiding Principle 2.1.1 [Acknowledge and Respect Indigenous Rights]. Trust Council is committed to reconciliation and to long-term healing and relationship building with Indigenous governing bodies and Indigenous Peoples across the region. The policies in this section aim to acknowledge the history and legacy of Indigenous Peoples in the area since time immemorial, to recognize and respect the existing rights of Indigenous governing bodies regarding land use decisions that impact	As commented by Cowichan Tribes on a previous draft of the policy statement, it would be useful to consider a mechanism whereby IT earmarks funds to purchase and return private lands to Cowichan Tribes and to the Quw'utsun Nation. Lands prioritized could be those for cultural protection (which includes ancillary ecological benefits). As IT is a body created by the Province, they too have a role in returning land to First Nations. It would be good to see this goal woven throughout the other goals in the document,	New draft advisory policy 3.1.3 has been added under Goal 1: Advance Reconciliation: Land Back <i>Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies as an amenity contribution in applications seeking additional development potential.</i>

their territories, and to build foundations for collaborative governance and shared decision making	made more explicit.	
PART 3: Goals and Directive Policies – 3.1.2 – Cooperate With Indigenous Governing Bodies		
Cooperate with Indigenous governing bodies on significant discretionary land use decisions that may impact their territories and the ecological health of the Salish Sea, and when addressing all Policy Statement directive policies (i.e. those under Part 3’s Goals 2, 3, 4, and 5)	Significance level to be determined by the Indigenous Nation, not IT or a regulator.	Draft policy 3.1.2 has been revised based on Indigenous Governing Body comments to read: Cooperate with Indigenous Governing Bodies <i>Engage with Indigenous Governing Bodies on discretionary planning and land use management decisions..</i> Islands Trust is currently examining and seeking to refine its referral process to address some of the issues raised by IGBs during the Policy Statement review and through other communication channels. Islands Trust staff are hopeful that through agreements we can establish what is of significant to Indigenous Governing Bodies and refine our referral process, including the types of referrals submitted, as guided by the Indigenous Governing Bodies.
PART 3: Goals and Directive Policies – Goal 2		
this should be guided by Indigenous Peoples, Indigenous governing bodies and Indigenous Knowledge Holders and undertaken in a culturally sensitive manner that respects confidentiality protocols around the sharing of Indigenous Knowledge	Including OCAP	New draft advisory policy 3.1.4 has been added under Goal 1: Advance Reconciliation Respect Indigenous Protocols for Information and Data Provided <i>Respect Indigenous Government Bodies’ and Indigenous Knowledge Holders’ protocols about how their data and information should be collected, protected, used, and shared.</i>

PART 3: Goals and Directive Policies – 3.2.1 – Indigenous Cultural Heritage Sites		
Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, middens, cairns, petroglyphs and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.	It's a bit odd to say that local trust committees and municipalities shall identify indigenous cultural heritage sites. They should work (in a structured manner, including providing capacity funding) with Indigenous Nations to protect cultural sites, cultural landscapes including harvesting areas etc	Draft policies 3.2.1 and 3.2.3 address this feedback. Trust Council will need to consider creating a Trust Council policy on capacity funding to guide future decisions about providing funding to Indigenous Governing Bodies to support engagement/cooperation.
PART 3: Goals and Directive Policies – 3.2.2 – Indigenous Harvesting Areas		
Identify and protect Indigenous harvesting areas on land and marine foreshores including, but not limited to, fish weirs, clam gardens, camas meadows, and other areas used for Indigenous hunting, fishing, trapping, and gathering of plants and medicines.	Previous Cowichan Tribes comment asking how IT will work with Cowichan Tribes to address land return. IT identified that this section would be the place ("identify" areas for protection). Identifying areas for protection is not synonymous with land return, nor is there any indication in this section that IT will work with Cowichan Tribes and the Quw'utsun Nation to recognize our jurisdiction within our territory, including, but not limited to harvesting sites. I suggest that this applies more broadly than just harvesting places and areas (which are certainly important but not the only areas of our territory to which we have jurisdiction)	New advisory policy 3.1.3 has been added under Goal 1: Advance Reconciliation: Land Back <i>Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies as an amenity contribution in applications seeking additional development potential.</i>
PART 3: Goals and Directive Policies – Goal 3		
This goal advances Principle 2.1.2 [Prioritize Environmental Protection]. Trust Council acknowledges that preserving and protecting the ecological integrity of the Islands Trust Area is essential to the Islands Trust Object and to supporting community well-being across the region. The policies in this section aim to identify and protect key	Removal of invasive species is safeguarding biodiversity so I don't see the need for these parentheses.	Intro para to Goal 3 has been amended to by removing "(excluding invasive species)." This change also responds to a previous Trust Council request to shorten and simplify the document, and represents a common-sense understand of safeguarding biodiversity.

ecosystem types and characteristics that safeguard biodiversity (excluding invasive species) and promote resilience to climate change.		
PART 3: Goals and Directive Policies – Goal 3 – Ecosystem Integrity		
Local trust committees and island municipalities shall...	Work with Indigenous Nations to do the following...	Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies.
PART 3: Goals and Directive Policies – 3.3.1 – Protected Area Networks		
Identify, establish, and maintain a network of protected areas of sufficient size and distribution to preserve the environmental integrity of ecosystems in their planning area.	Protected areas should be focused on cultural protection as determined by First Nations whose territory the place is within. As a minimum, this will necessitate shared decision-making with First Nations; preferably would be governance entirely by First Nations. It is a widely researched and understood that indigenous land management, including care for cultural landscapes and places, has great ecological benefits as well as cultural benefits. Indigenous governance and land management would enhance the goals of IT while working towards greater recognition of Indigenous nations as self-determining, focusing on the protection of indigenous cultural heritage (which nonetheless includes ecological integrity).	Draft advisory policy 3.3.11 has been added to Goal 3 Indigenous Protected and Conserved Areas <i>Support Indigenous Governing Bodies in the establishment of Indigenous Protected and Conserved Areas</i> Several directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies.
PART 3: Goals and Directive Policies – 3.3.3 – Forest Ecosystems		
Identify forest ecosystems and prioritize the preservation, protection, and restoration of	Previous comment from Cowichan Tribes that Garry Oak and arbutus forests and meadows	Draft policy 3.3.4 addresses this comment.

unfragmented forest ecosystems, with particular focus on remaining stands of relatively undisturbed Coastal Douglas-fir and Coastal Western Hemlock and their associated ecosystems.	be included here.	Coastal Oak and Prairie Ecosystems <i>Identify and prioritize the preservation and protection of coastal oak and prairie ecosystems, with a particular focus on their maintenance, restoration and management of their ecological integrity.</i>
PART 3: Goals and Directive Policies – 3.4.1 – Sustainable Development		
Sustainable Development	Work with First Nations on revenue-sharing, jobs and other economic development opportunities. Collaboration with First Nations in regards to their housing needs, including the development of affordable housing for Cowichan Tribes members.	Draft policy 3.4.1 has been revised since this comment. The intention of this policy is to speak to development patterns. Draft directive policy 3.4.12 has been amended to read: Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> Draft advisory policy 3.4.17 says “Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.” Draft policy 3.4.7 already addresses economic opportunities: Economic Activities <i>Support sustainable economic activities that are compatible with the preservation and protection of the Trust Area and its unique amenities, environment, community health, and that consider transportation and infrastructure capacity</i>

		A new advisory policy 3.4.10 has also been added: Economic Development Opportunities for Indigenous Communities <i>Through engagement with Indigenous Governing Bodies, support economic development opportunities for Indigenous communities</i> Specific Trust Council initiatives that support economic opportunities for Indigenous communities would happen separately from implementation of the Policy Statement.
PART 3: Goals and Directive Policies – 3.4.2 – Sustainable Development		
Establish appropriate density limits for efficient and sustainable use of the land base that help to safeguard protected area networks, and is compatible with preservation and protection of the area's unique amenities and environment.	Land including foreshore and water. Ex. considering the impacts of existing private docks on eelgrass and on harvesting abilities and access for First Nations.	Draft directive policy 3.5.25 has been revised to read: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i> Directive policy 3.3.6 require local trust committees and island municipalities to “<i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i>” Draft advisory policy 3.2.4 addresses protection of Indigenous Harvesting Areas.
PART 3: Goals and Directive Policies – 3.4.3 – Impacts of Development		

Consider the aesthetic, environmental, and social impacts of development.	Work with First Nations to have Indigenous artists involved in public design.	This would be captured through OCP development. In particular, form and character development permit guidelines. To date Trust Council has not signaled a desire to require OCPs to include specific content and as such staff have not recommended such. Individual LTCs/island municipalities can implement DP guidelines encouraging Indigenous design.
PART 3: Goals and Directive Policies – 3.4.4 – Community Facilities and Services		
Ensure that each community's current and projected long-term needs for educational, institutional, community, health, cultural, and recreational facilities and services are considered and planned for.	Working with First Nations to ensure that our community needs are met as well. Cowichan Tribes does not have IRs on the Gulf Islands but these are still our homelands which were preempted. It is common for municipalities not to work with Cowichan Tribes and the Quw'utsun Nation as a whole when developing OCPs and other regional plans, thereby planning for maximum growth without accounting for use by Cowichan Tribes members.	Draft policy 3.4.4 has been revised to read: Community Facilities and Services Ensure that each island community's, and local Indigenous communities', current and projected long-term needs for educational, institutional, community, health, cultural, recreational facilities and services, and outdoor recreation are considered and planned for. Draft policies 3.1.1, 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies.
PART 3: Goals and Directive Policies – 3.4.5 – Climate Change Mitigation and Adaption		
Identify land use strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.	Yes, including ecological restoration - mitigation and enhancement specific to that ecosystem.	Restoration of sensitive ecosystems addressed in draft policy 3.3.2.

PART 3: Goals and Directive Policies – Goal 4– Recreation		
Recreation	Concern that recreation mandates often overtake harvesting rights and protection of indigenous cultural landscapes and places. IT must work closely with Indigenous Nations around any development of recreational sites to ensure that our cultural heritage and rights are protected.	Draft directive policy 3.4.31 concerning public access to the shoreline has been revised to read: “Identify new, protect existing, and support the acquisition and protection of, safe public access to marine shorelines and along marine shorelines that are appropriate for low-impact, public recreational use and do not adversely impact the Trust Area and its unique amenities and environment, including Indigenous Peoples’ identified cultural heritage sites and marine harvesting areas.” The “unique amenities” of the Islands Trust Area are understood to include Indigenous cultural heritage sites. Draft policies 3.1.1 and 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with First Nations. Draft advisory policies 3.2.5 and 3.2.6 addresses opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas.
PART 3: Goals and Directive Policies – 3.4.19 – Low Impact Recreation		
Identify appropriate locations and types of facilities for low-impact and active recreational activities, and discourage high-impact recreational facilities that may adversely impact the preservation and protection of the area’s unique amenities and environment.	Low-impact rec can still impact cultural activities, depending on the teachings associated with that activity. Quiet and seclusion are important characteristics needed for certain cultural activities - highlighting the need to work collaboratively with First Nations on such plans.	Draft policies 3.1.1 and 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies.
PART 3: Goals and Directive Policies – 3.4.21 – Access to Community Marinas, Boat Launches and Docks		
Identify safe public access to community marinas, boat launches, and docks.	Concerns around the environmental and cumulative impacts of docks. Community/public marinas are generally a	Draft policies 3.1.1 and 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous

	better way to go, however, it is necessary to work collaboratively with First Nations regarding such developments.	Governing Bodies.
PART 3: Goals and Directive Policies – 3.4.23 – Trail Systems		
Identify appropriate locations, types, and safe public access to public pedestrian, equestrian and bicycle trail systems to support active recreation that are compatible with preservation and protection of the area's unique amenities and environment	Compatible with aboriginal rights and title and indigenous self-determination - all of these recreational decisions need to be made in explicit collaboration with the Quw'utsun Nation.	Draft policies 3.1.1 and 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies..
PART 3: Goals and Directive Policies – 3.4.24 – Public Shoreline Access		
Identify and protect areas providing safe public access to marine shorelines and along marine shorelines that are appropriate for low-impact, public recreational use and do not adversely impact unique amenities and the environment.	Noting that there are many archaeological sites along the beaches and foreshore which need to be protected, working with the Quw'utsun Nation as the right and title holding nation. Additionally, beaches and foreshores should be cleaned up, access for Quw'utsun Nation members with regards to harvesting rights is necessary.	Draft directive policy 3.4.31 concerning public access to the shoreline has been revised to read: <i>“Identify new, protect existing, and support the acquisition and protection of, safe public access to marine shorelines and along marine shorelines that are appropriate for low-impact, public recreational use and do not adversely impact the Trust Area and its unique amenities and environment, including Indigenous Peoples’ identified cultural heritage sites and marine harvesting areas.”</i> Draft directive policy 3.5.18 concerning foreshore excavation has been revised as follows: <i>“Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.”</i> Draft advisory policy 3.2.5 addresses opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas

PART 3: Goals and Directive Policies – 3.5.1 – Freshwater Sustainability		
Ensure that 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.	Yes, need to ensure planning with the Quw'utsun Nation regarding our housing needs.	Draft directive policy 3.4.12 has been revised to read: Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> <i>Additionally, draft advisory policy 3.4.17 has been added as follows:</i> Housing for Indigenous People <i>Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.</i>
PART 3: Goals and Directive Policies – Agricultural Lands		
Directive Policies - Agricultural Lands	Noting the need for shared decision making with the Quw'utsun Nation. Determining future use of land must include the nation.	Draft policies 3.1.1 , 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies. New advisory policy 3.5.16 has been added: Food Security and Food Sovereignty <i>Support initiatives that advance food security and Indigenous food sovereignty.</i>
PART 3: Goals and Directive Policies – 3.5.15 – Soils and Fill from Middens and Foreshore Area of Cultural Significance		
Prohibit alteration, removal or excavation of soil or fill from middens or foreshore areas identified as culturally significant areas.	Not all culturally significant sites - not all archaeological sites are recorded and/or known to the Archaeology Branch. The policy must include how IT will work in collaboration (per DRIPA) with the Quw'utsun Nation around the protection of our material cultural	Soil and fill directive policy 3.5.18 has been revised as follows: Soil and Fill from Middens and Foreshore Areas of Cultural Significance <i>Prohibit alteration, removal or excavation of soil or fill</i>

	heritage. How will chance finds be addressed? Noting that this was a previous comment made by Cowichan Tribes, which has not been addressed.	<i>from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.</i> Draft directive policy 3.2.1 and advisory policy 3.2.4 address protection of Indigenous cultural sites. Draft policies 3.1.1 and 3.1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies. Development of a process for chance finds is best addressed through an agreement and associated Trust Council policy/staff procedure, rather than the Policy Statement.
PART 3: Goals and Directive Policies – 3.5.18 – Soft Shoreline Protections		
Consider and foster soft shoreline approaches first such as those identified by the “Green Shores” program to set requirements for shoreline preservation	As stated by Cowichan Tribes in comments on a previous draft, development of stretches of foreshore that don't have existing infrastructure should be prevented. There are very few areas in our territory where Quw'utsun Mustimuhw can harvest resources on the foreshore, which is an aboriginal right and important for food security and cultural transmission. IT should also commit to working with the Quw'utsun Nation, DFO and municipalities to restore contaminated beaches so that harvesting can occur in the future.	Islands Trust Council does not wish to direct local trust committee and island municipalities to prohibit seawalls and other hard shoreline armouring in the Islands Trust Area, nor is it prepared to mandate Green Shores approaches to managing shoreline erosion. However, it has revised directive policy 3.5.21 as follows: Soft Shoreline Protections Consider and Prioritize and foster soft shoreline approaches first, such as those identified by the “Green Shores” program, to set requirements for shoreline preservation, and to mitigate erosion of shoreline and foreshore cultural heritage sites. Draft policies 3.1.1 and 3.1.2 speak to how Islands

		Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies. Revised draft policy 3.4.25 addresses prevention of contamination by wastewater disposal systems which can impact cultural heritage and marine harvesting sites. While the restoration of contaminated beaches is outside the jurisdiction of Islands Trust Council, new draft advisory policy 3.3.10 addresses supporting opportunities for Indigenous-led ecosystem management.
PART 3: Goals and Directive Policies – 3.5.19 – Marinas		
Identify requirements for the location, size, and nature of marinas that are compatible with preservation and protection of the area's unique amenities and environment.	and protection of Quw'utsun Nation cultural landscapes including, but not limited to, archaeological sites.	The term 'unique amenities' encompasses archaeological sites.
PART 3: Goals and Directive Policies – 3.5.20 – Sharing of Coastal Facilities		
Identify opportunities for the sharing of coastal facilities such as docks, wharves, floats, jetties, boat houses, board walks, and causeways.	these often have ecological impacts impacting aboriginal rights	The draft policy has not been revised.
PART 4: Policy Statement Amendments – Policy Statement Amendment Projects		
"Trust Council can identify any Policy Statement amendment tasks to be undertaken that term. Newly elected Trust Councils shall cooperate with Indigenous governing bodies..."	[Comment 1] "What mechanism for Indigenous nations in whose territory IT operates to put forward policy amendments?" [Comment 2] "Need higher level discussions between IT and Quw'utsun Nation to negotiate structures for shared decision-making. Cooperation is not a specific commitment that can be evaluated heldup."	Staff will advise Cowichan Tribes that the method by which Indigenous Governing Bodies put forward policy amendment suggestions to Trust Council could be as simple as writing a letter at any time outlining the request. As desired, specific methods can be agreed to in an agreement. It is anticipated that any future Policy Statement Amendment Process will involve Indigenous Governing Bodies from the outset. Executive Committee has requested staff to work with

		Quw'utsun Nation on a protocol agreement, however Islands Trust staff have been delayed in advancing this work. Cowichan Tribes/Quw'utsun Nation could also pursue a UN Declaration agreement with the Province concerning the Islands Trust. However, a leadership-to-leadership meeting may be appropriate first. Guiding principle 2.2.2 states that Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
PART 4: Policy Statement Amendments – Implementation of Policy Statement Amendments		
“Trust Council may allocate resources to support local trust committees and island municipalities to undertake this work”	Need to ensure adequate resourcing to Quw'utsun Nation member communities to ensure we can participate in engagement with IT.	This comment needs to be address outside the Policy Statement draft. Trust Council will need to consider a policy on capacity funding to guide future decisions about providing funding to Indigenous Governing Bodies to support engagement/cooperation.
Glossary of Terms – Archaeological Sites		
All archaeological sites in British Columbia are protected under the Heritage Conservation Act. This applies whether sites are located on public or private land, and whether the site is known or unknown. Protected archaeological sites may not be altered or changed in any manner without a permit. There are over 60,000 archaeological sites recorded in BC's	Not a major point, but as this is a glossary, it should define the term. This isn't a definition of an archaeological site. Not for the glossary, but as general information: archaeological sites are where material evidence of past human activity. There are many places where material evidence may not have been found but that does NOT mean that areas where material evidence has not been found were not	In response to this feedback, the draft definition was previously revised to include: <i>Archaeological sites consist of the physical remains of past human activity.</i>

Provincial Heritage Register including the remains of village and other habitation sites, as well as resource procurement activities such as fishing weirs and culturally modified trees. These sites may date anywhere from recent times to 14,000+ years ago, and studies continue to uncover new information. (Source: BC Archaeology Branch)	occupied (any archaeologist would confirm this). As such, it is imperative to understand that the entire Quw'utsun territory is and was a lived landscape and that importance of sites is not limited to recorded arch sites.	
Glossary of Terms - Middens		
Middens are the heaps of shells, bones, utensils and artifacts that accumulated sometimes over thousands of years of Indigenous Peoples' occupation of a site. Indigenous Peoples were originally thought to be nomadic but the existence and dates of middens are proof positive that some Indigenous Peoples occupied their villages year round. In British Columbia, all middens are protected if they contain artifacts, features, materials or other physical evidence of human habitation or use before 1846. Protection means that a permit is required to alter the site. There are approximately 5700 recorded shell midden sites in the province, and thousands of additional sites that have not been identified to date. (Source: Indigenous Corporate Training Inc.)	Comment: Quw'utsun elders have emphasized that middens are cultural heritage, they are ancestral places, not "heaps" of refuse. There could be other material cultural heritage (artifacts) or ancestral remains (burials) in middens. "these archaeological sites are indicative of past First Nations settlement activity. Formed by the accumulation of stratified cultural deposits over thousands of years, shell midden sites represent some of the most complex archaeological sites in the world" (McLay et al 2008) Comment: Why this reference? For a discussion of middens by Quw'utsun elders, see McLay et al 2008 "A'lhut tu tet Sul'hweentst Respecting the Ancestors"	In response to this feedback the draft definition was revised.

Cowichan Tribes	
July 2021 version	Comments from Islands Trust Staff
Highlights of comments	
Mention that First Nations have Rights and Title assured under the Constitution Act, Section 35.1	Indigenous Inherent Rights Acknowledgement has been revised with the following additional clause: "Islands Trust Council is committed to advancing reconciliation with Indigenous Governing Bodies through ongoing discussion and recognition of these rights."
The IT Act and Islands Trust's jurisdiction were established without any consultation with FNs. Should this be stated explicitly?	This was not added to the draft document.
Somewhere in the document there needs to be a section on present day lands held by FNs in the Islands Trust Area. And an explanation of who has treaties (Douglas or modern day), who has reserve land on the islands, why the Quw'utsun Nation does not have reserve land, who are presently negotiating treaties, as well as negotiations toward establishment of treaty settlement lands. There needs to be an understanding set in this document that despite Quw'utsun not having reserve lands here, there is still a significant strength of claim, and rights and title. This is important since Quw'utsun Nation often receives lower Indigenous impact assessments by BC likely at least in part due to lack of treaty and lack of reserve land on the islands	In keeping with Trust Council direction to make the document shorter, this content has not been recommended as it would be impractical to achieve for 30+ Indigenous Governing Bodies. Islands Trust may develop a map that reflects general territorial interests of Indigenous Governing Bodies for future inclusion in the Policy Statement, but such a map would require the buy-in on all IGBs.
The threshold is 30% development in a watershed before loss of ecosystem/watershed function is permanent.	The original sentence referenced has been deleted. It had stated "A widely accepted threshold for the region is approximately 30-40% of converted area for any given habitat."
There may be still be areas where culturally important species persist, a great barrier to FNs is access because vast majority of lands in the islands are held privately.	Now addressed through advisory policy 3.2.6.
Marine and terrestrial harvesting opportunities are vulnerable. And vulnerable not just to climate change, but to intensive development that converts environments important for harvesting by indigenous peoples.	This comment is address through draft policies 3.2.1 through 3.2.3.
Many FN people still harvest in the IT area, and may who do not, would like opportunities for them or their descents to harvest here	This comment is address through draft policies 3.2.1 through 3.2.3.
DRIPA incorporates the principle of Free, Prior and Informed Consent ("FPIC"). A commitment to aligning policies and processes with DRIPA requires something greater than "cooperative decision-making"; i.e., it requires Islands Trust (and the province) to participate in consent-seeking from Indigenous groups.	Revisions made within the limits of existing legislation. To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies draft section 1.3 - "Indigenous

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	Inherent Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”
Islands Trust could gather funds from residents of the IT area that would be ear-marked for purchasing lands entirely for indigenous use and ownership. The IT could work with FN governments to identify and plan for lands for eventual purchase. The lands could be for eg sensitive use areas, arch sites, or cultural and sacred sites purchased as they come onto the market. Cowichan Tribes supports all mechanisms toward #landback.	New draft advisory policy 3.3.11 has been added as follows: Indigenous Protected and Conserved Areas <i>Support Indigenous Governing Bodies in the establishment of Indigenous Protected and Conserved Areas.</i> New advisory policy 3.1.3 has been added under Goal 1 as follows: Land Back <i>Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies as an amenity contribution in applications seeking additional development potential.</i>

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Provide an additional statement saying that although there are a large number of culturally important species, access to them by FNs is often restricted or altogether absent, when attempting to harvest important materials, foods and medicines.	Indigenous harvesting and hunting area access is addressed through draft advisory policy 3.2.6.
Simply securing access to freshwater for cultural and spiritual purposes is not sufficient for the exercise of aboriginal and indigenous rights related to cultural/spiritual uses of freshwater; Islands Trust decision-making must also support flow levels that facilitate such uses.	Draft advisory policy 3.5.6 addresses striving to ensure that water quality in lakes, streams and wetlands is maintained, and that freshwater use is not to the detriment of other uses of the waterway such as fish and amphibian habitat uses, Indigenous cultural and spiritual uses, and aesthetic and recreational uses.
As what is happening in many places in the territory, forests and designated forestry lands are being sold for residential, commercial and institutional developments. This practice serves to convert forest lands and all of the environmental services provided by forests, including indigenous uses, to another purpose, so that they will never be forested again. This as opposed to lands designated for forestry activities which at least with time will be forests again (Note - this statement does not apply to Old-growth forests and stands, which once cut, will most likely never attain old growth status again)	Addressed in policy 3.5.8 which calls for “Maintain large parcel sizes to support sustainable forest management practices.”
Add a policy on excavations and chance finds of archaeological materials not previously mapped or recorded in IT or BC databases, with provisions to engage FNs experts in all resulting arch investigations. Also include a whole policy on the protection of known archaeological sites. Note that where a midden is present there is always a possibility of encountering ancestor burials.	Development of a process for chance finds is best addressed through an agreement and associated Trust Council policy/staff procedure, rather than the Policy Statement. Protection of archaeological sites addressed in directive policy 3.2.1 and advisory policy 3.2.4
Moorage and anchorage sites should also not be permitted in identified Indigenous shoreline harvesting areas	Draft directive policy 3.5.19 has been revised to read: <i>“Direct aquaculture tenures to appropriate locations that will not adversely impact areas identified as culturally significant by Indigenous Governing Bodies, that provide critical habitat for species at risk, are of recreational significance, or establish or designated upland uses, anchorages or moorages.”</i> Draft directive policy 3.5.22 says:

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	Vessel Moorage <i>Prohibit the moorage of vessels in sensitive marine areas, including, but not limited to, eelgrass meadows, kelp forests, forage fish spawning areas, estuaries and mud flats.</i>
Prevent development of any stretches of foreshore that don't already have existing foreshore infrastructure, since these areas will be acceptable for indigenous harvesting (food source purity). Also note that all marine foreshore areas contain food resources since indigenous people harvest myriad species for food.	Draft directive policy 3.5.26 says: Marine Structures <i>Limit or prohibit the construction of installation of breakwaters, groynes, rock weirs and jetties in marine areas that are not zoned for group wharfage, marine commercial or industrial use, or ferry terminals.</i>
Cowichan Tribes supports prohibition on private docks.	Current draft Policy Statement does not prohibit docks. Draft directive policy 3.5.25 states: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>
Given Island Trust's acknowledgement of the forcible dispossession of Indigenous peoples of these lands and their desire to return home to them, Islands Trust housing policies should work to facilitate that process where appropriate (i.e., working with housing developers to dedicate units to affordable housing for local Indigenous peoples	Draft directive policy 3.4.12 has been revised to read: Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> Additionally, draft advisory policy 3.4.17 has been added as follows: Housing for Indigenous People <i>Through engagement with Indigenous Governing</i>

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	<i>Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.</i>

Cowichan Tribes	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Text of July 24, 2020 letter	
Thank you for engaging with Cowichan Tribes on proposed amendments to the Islands Trust Policy Statement. We understand that the Policy Statement is an important document that requires ministerial approval to amend and we also understand that it will shape decision-making within the Islands Trust area for years to come. Please find attached our edits, comments and suggestions in a “track changes” MS Word format. We provide these to you in fulfillment of the terms of our capacity funding agreement dated May 26, 2020. Below we have also set out a number of more general observations related to how Islands Trust may implement some of their reconciliation commitments through amendments to the Policy Statement. <u>Islands Trust’s Commitment to Reconciliation</u> On March 13, 2019, Islands Trust Council passed a Reconciliation Declaration. Individual Local Trust Committees (LTC) have also passed standing resolutions outlining their reconciliation commitments. Islands Trust also passed the Islands Trust Reconciliation Action Plan 2019-2022. By way of these resolutions, declarations and plans, Islands Trust has made clear its commitment to move forward in true partnership with the Indigenous peoples on whose lands they carry out their work. We extend our acknowledgement for the work Islands Trust has done to communicate their intentions. As we move into the realm of decision-making policies and requirements, Islands Trust will be pressed to turn the words spoken in those intention documents into concrete action. S. 15(2) of the <i>Islands Trust Act</i>, RSBC 1996, c. 239 sets out what must be contained in the Policy Statement. The requirements in s. 15(2) are a legal floor and not a ceiling-	Draft principles 2.1.2 and 2.1.3 in Draft 2 were blended to reflect Cowichan Tribes’ comments. To address comments from Cowichan Tribes and other Quw’utsun Nation members, and other Indigenous Governing Bodies draft Section 1.3 - “Indigenous Inherent Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Draft guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”

Cowichan Tribes	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
the Islands Trust therefore appears free to add substantive content to the Policy Statement so long as the legislated requirements of s,15(2) are met. We therefore suggest that Trust Council add an additional section of the Policy Statement which sets out the ways in which the Islands Trust mandate to preserve and protect the unique ecosystems and attributes of the Trust Area will be earned out in true partnership with First Nations in accordance with the <i>Declaration on the Rights of Indigenous Peoples Act</i>, SBC 2019, c. 44. This section should be drafted in collaboration with participating First Nations. <u>Position Statements and LTC/Island Municipality Directives</u> Cowichan Tribes interacts mainly with individual LTC and island municipalities with regards to issues such as development proposals and rezoning applications. Those activities provide the main context within which we are affected by decision-making within the Trust Area. Therefore, in our respectful view, the position statements made in the Policy Statement have limited weight and are of limited practical effect to us as First Nations, as compared to the policy directives. We would therefore like to see some of the position statements given some teeth by moving them into the policy directives sections of the relevant sub-headings (e.g., forests, heritage), if doing so does not run afoul of Trust Council's jurisdiction vis-a-vis the LTC. We also suggest that Islands Trust explore using the Policy Statement to establish an Indigenous advisory body tasked with assisting LTC and island municipalities in implementing Islands Trust's broader reconciliation commitments in the context of local decision-making. Alternatively, the Islands Trust could approach the Province to request a legislative amendment to the <i>Islands Trust Act</i> if such an amendment would be required to establish an Indigenous advisory body.	Trust Council could establish an Indigenous advisory body tasked with assisting LTC and island municipalities in implementing Islands Trust's broader reconciliation commitments in the context of local decision-making.
Highlights of comments	
Re draft sentence: "In 1974, the provincial government recognized that the Islands Trust Area needed preservation and protection in order to maintain water quality and sustainability, to preserve and protect marine and land-	This wording has been removed from current working draft.

based wildlife habitats, and archaeological and cultural sites.” I would caution that this statement may not sit well with some Indigenous groups – many archaeological sites within the Gulf Islands have been damaged in the name of development and that damage has been sanctioned by the provincial government. As the Islands Trust is aware, this is still an active matter of contention.	
Re draft sentence: “Accelerating negative impacts accompanying development in the surrounding urban regions - pollution of air and marine waters, discharge of pulp mill effluent, disposal of waste, ocean dumping and spills associated with marine shipping - threaten the Trust Area’s environment, amenities and fragile ecosystems.” Should add that climate change is also a relevant exacerbating factor here.	This wording has been removed from current working draft.
Re Policy Statement rationale: Add in a general acknowledgement of the policy statement being developed while recognizing the inherent jurisdiction and leadership roles of First Nations, as well as Indigenous and Aboriginal rights.	To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - Indigenous Inherent Rights Acknowledgement - was added to the draft document.
Re draft sentence: “Local trust committees are not required to comply with any policy in the Policy Statement not stated as a directive policy.” To be clear then, the Trust Council may take a position on a matter involving, for example, Indigenous issues, and none of the local trust committees would be required to act in a manner consistent with the Trust Council’s position? If this is indeed the case, then there may be cause for concern. Local trust committees are the bodies with whom we deal most regularly, and they are typically the ones making on-the-ground decisions which can impact our inherent rights – they are also much more susceptible to local politics and aggressive lobbying. What meaning then, does a position taken by Trust Council have when local trust committees are free to act inconsistently with those positions?	Current draft introduces the concept of advisory polices. They are not binding upon LTCs or island municipalities.
Re draft section on Role of First Nations “First Nations through self-determined representatives or government structures will maintain and strengthen their treaty and traditional territories through cooperative decision-making and engagement to address certain matters related to land and water use. Cooperative actions such as engagement and mutually supportive strategies and action plans are necessary for the sustainability of the Trust Area.” Instead of “maintain and strengthen”. We would suggest this the phrase “help preserve and protect”	This language has been removed from the current draft.

– our territories in and of themselves do not need to be “maintained” – they simply <i>are</i> . Our suggested language is also more consistent with the legislated objects of the Islands Trust. This [first] line may be problematically vague. It may be helpful here to list some examples of matters that may be addressed through engagement.	
Re Object: If there’s nothing substantial stopping a legislative amendment to s.3 of the Islands Trust Act, then it should be done.S.3 should be amended to explicitly include Indigenous peoples and the principles of UNDRIP. This will ensure consistency with the Declaration on the Rights of Indigenous Peoples Act, SBC 2019 c. 44 (DRIPA)	At request of Islands Trust the Islands Trust Act was updated to include cooperating with First Nations. Trust Council has written to the Minister of Housing and Municipal Affairs requesting a comprehensive governance review of Islands Trust. The Minister has declined.
Re Object and its Meaning section Re draft sentence “The Islands Trust seeks to integrate ecosystem preservation and protection, sustainable communities and stewardship of resources.” If there’s nothing substantial stopping a legislative amendment to s.3 of the Islands Trust Act, then it should be done.S.3 should be amended to explicitly include Indigenous peoples and the principles of UNDRIP. This will ensure consistency with the Declaration on the Rights of Indigenous Peoples Act, SBC 2019 c. 44 (DRIPA). This last line should read “co-stewardship of resources” – Indigenous communities actively steward the resources within our territories.	Preamble language removed from the draft new Policy Statement.
Re Object and its Meaning section Re draft sentence “Their needs can only be met and sustained within the limitations of the natural environment and the island communities of the Trust Area.” How does the Islands Trust determine these limitations? What is the “carrying capacity” of each island? If these are not ascertained, continued and sustained incremental growth and development (no matter how “green” the development may be), will continue to be allowed to erode the functionality of the very ecosystems and resources that the Islands Trust is mandated to protect.	Reference to density limits and carrying capacity have been removed from the current draft Policy Statement. Instead, Growth Management directive policy 3.4.2 is used: Growth Management <i>Manage community growth and its associated impacts by directing residential, commercial and industrial development into suitable locations, to prevent sprawl minimize fragmentation of forest lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.</i>
Re Guiding Principle: “When making decisions and exercising judgment, Trust Council will place priority on preserving and protecting the integrity of the environment, cultural heritage, and amenities in the Trust Area.” In addition to being a guiding principle, this should also be a policy directive.	Guiding principle 2.1.2 addresses prioritization. Draft policies 3.2.4, 3.2.5, 3.2.7 and 3.2.8 have been revised to change “Identify and protect” to “Identify and prioritize protection of”

How are local trust committees required to act in a manner consistent with these positions and statements? The amendments to this policy statement needs to meet the legislated requirements of DRIPA. Much of the language in this document falls short.	Revisions made within the limits of existing legislation.
Where does the Islands Trust stand on the integration of Indigenous land management regimes (e.g. controlled burning)?	Draft ecosystem integrity advisory policy 3.3.10 has been added, which says: Indigenous Ecosystem Management <i>Through engagement with Indigenous Governing Bodies, support opportunities for Indigenous-led ecosystem management.</i> This can be discussed with Cowichan Tribes outside of the Policy Statement amending process.
Add reference to Indigenous spiritual and health needs – many of the lands and waters of the Trust Area are utilized by Indigenous peoples for spiritual and wellbeing purposes.	There are now references to protecting areas important for Indigenous spiritual practices, e.g. draft advisory policies 3.2.7 and 3.2.8: Other Culturally Significant Areas for Indigenous Peoples <i>Through engagement with Indigenous Governing Bodies, identify and prioritize protection of areas of importance for Indigenous cultural and spiritual practices.</i> Culturally Significant Species and Medicinal Plants <i>Through engagement with Indigenous Governing Bodies, identify, prioritize protection, and support restoration of culturally significant species and medicinal plants and ochre.</i>
Stewardship for Cowichan peoples is an imperative under Indigenous law – it is not voluntary.	Definition of “Stewardship” has been revised to add: <i>For Indigenous Peoples, stewardship may be mandatory under Indigenous law.</i>
Land use planning should account for the existing and anticipated effects of climate change on ecosystem function and resiliency	Climate change is addressed in the new draft Policy Statement.
Are land uses adjacent to protected areas are constrained through policy?	Generally addressed by ecosystem integrity policies.
Re draft recommendation policy: Trust Council encourages government agencies, non-government organizations, property owners and occupiers to	Draft principles 2.1.2 and 2.1.3 in Draft 2 were blended to reflect Cowichan Tribes’ comments.

protect forested areas through voluntary donation, acquisition, conservation covenants and careful management.” Should add “through collaboration and partnership with First Nations where possible.”	To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies Section 1.3 - “Indigenous Inherent Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”
Re directive policy about addressing location and construction of roads, trails and utility and communication corridors to minimize the fragmentation of forests – add trails	This change was not made.
References to public use or public access should be public and Indigenous use or access	Draft advisory policy 3.2.6 addresses opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas.
There needs to be directive policies re wildlife and vegetation as the islands hold a myriad of culturally important vegetation species. For example, Cowichan people still presently hunt on Gabriola, Galiano and Valdes Islands and will continue to do so as an exercise of their inherent rights – this needs to be kept in mind while Islands Trust Council or LTCs are policy-making.	Draft advisory policies 3.2.5 through to 3.2.7 address protection and supporting restoration of culturally significant species and medicinal plants.
Development and aquaculture should be directed away from identified Indigenous harvesting areas	Addressed by draft directive policy 3.5.19

We would like to see Islands Trust take a stronger stance on protection of marine resources like shellfish, particularly as we continue to battle the province over the proliferation of private moorages in the Gulf Islands. Most of the bays are polluted and we have very few stretches of shoreline left to harvest in the Islands Trust jurisdictional area. It is extremely important to us that the preservation and protection mandate be carried out to protect these areas.	Draft directive policy 3.4.15 addresses wastewater disposal systems: Wastewater Disposal Systems <i>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</i> Draft directive policy 3.5.25 says: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>
One active issue is the lack of understanding as to how many aquifers interact with nearby freshwater streams. The province frequently employs guesswork when deciding whether to grant water licences. Islands Trust should use whatever leverage they have to try and further the collection of information regarding the interaction between aquifers and streams within their jurisdiction. This will help foster fully informed decision-making by all involved parties.	Islands Trust is undertaking groundwater mapping projects.
Re draft commitment of Trust Council policy: “It is the position of Trust Council that development, activity, buildings or structures should not result in a loss of significant marine or coastal habitat, or interfere with natural coastal processes.” “Significant” is an extremely problematic word. Because the bar of “significant” loss is so high, anything that falls below significant is considered acceptable – this is the very logic that results in “death by a thousand cuts” – i.e., cumulative impacts. We therefore strongly disagree with the use of the word “significant” in this policy	Draft advisory policy 3.1.2 has been revised as follows: Cooperate with Indigenous Governing Bodies Engage with Indigenous Governing Bodies on discretionary planning and land use management decisions that may have potential significant impacts on Indigenous Governing Bodies’ territories or the ecological health of the Islands Trust Area. This is an advisory policy and Indigenous Governing Bodies can advise us if they don’t want referrals about lot line changes or other minor matters.

Re draft language to minimize impacts to sensitive coastal environments: From the Indigenous perspective, everything is connected. We don't write-off places that have existing impacts and only seek protection of unencumbered areas. We realize that the marine ecosystem operates as a unified whole; we therefore expect all levels of government to minimize impacts of any development, no matter where on the coastline it occurs.	Draft directive policy 3.3.6 for marine shorelines and nearshore areas says: Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands</i> Draft directive policy 3.5.22 about vessel moorage says: Vessel Moorage <i>Prohibit the moorage of vessels in sensitive marine areas, including, but not limited to, eelgrass meadows, kelp forests, forage fish spawning areas, estuaries and mud flats.</i>
Islands Trust should also endeavour to undertake a resident education campaign about the importance of having septic systems routinely inspected and maintained.	Trust Programs Committee can consider this idea for a stewardship education webinar.
Marinas, boat launches, docks and anchorages are extremely important topics for Cowichan Tribes and an area in which we expect to work in true partnership with Islands Trust.	Staff note that there is a need for closer working relationship with staff of Indigenous Governing Bodies.
The Islands Trust should explicitly support policies and developments which seek to eliminate the socio-economic gap between Indigenous peoples and the broader public.	New draft advisory policy 3.4.10 in the Managing Growth and Development section has been added as follows: Economic Development Opportunities for Indigenous Communities <i>Through engagement with Indigenous Governing Bodies, support economic development opportunities for Indigenous communities.</i>
Understanding that there is no delegation to Islands Trust of the Crown's legal duty to consult, we encourage Islands Trust to adopt its own concept of what consultation looks like in the Trust Areas, in keeping with the Province's commitments as well as various policy expressions that have come forward from the LTCs recently (e.g. standing resolutions).	Staff note that there is a need for closer working relationship with staff of Indigenous Governing Bodies, and for protocol agreements.

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
General Comments		
Entire document.	When using the term unique amenities and environment change to Indigenous significance, unique amenities, and environment. There seems to be an overall sense that Indigenous Peoples have disappeared from/been forced out of the Islands Trust "object" (area). Suggest re-framing to indicate that Indigenous Peoples are very much still present and active stewards. Also suggest re-framing references to Indigenous Peoples using the active voice, emphasizing their agency, resistance/resilience, vs. framing as passive victims of colonialism.	The mandate of the Islands Trust flows from Section 3 of the <i>Islands Trust Act</i>. It is not within the jurisdiction of the Islands Trust to change the "object". The term unique amenities is inclusive of cultural heritage of Indigenous Peoples. The current draft attempts to incorporate modern use of the Trust Area by Indigenous People.
Part 1: The Islands Trust Act – 1.1 – The Islands Trust Object		
"The object of the trust is to preserve and protect the Trust Area and its unique amenities and environment for the benefit of the residents of the Trust Area and of British Columbia generally, in cooperation with municipalities, regional districts, improvement districts, First Nations, other persons and organizations and the government of British Columbia." (Section 3, Islands Trust Act)	Suggest "collaboration" vs. "cooperation" (also see p.7 "In Cooperation With...")	The language in the draft Policy Statement references, verbatim, the Object of the Trust as defined in the <i>Islands Trust Act</i> .
Part 1: The Islands Trust Act – 1.3 – Interpretations of the Islands Trust Object		
Coast Salish peoples have been residents and stewards of the region since time immemorial. Many Indigenous Peoples were forcibly removed from their homelands	This phrasing sounds like Indigenous Peoples have disappeared from the area and only have distant 'interests' in the land. Suggest emphasizing indigenous Peoples'	Partly in response to K'ómoks Nation comment, this section was deleted in its entirety from the staff-recommended draft Policy Statement presented to Committee of the Whole in May 2024. It remains deleted

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
through colonization, but continue to have rights and responsibilities to their lands and waters, and many cultural, spiritual, and economic interests in the region. Preservation and protection of the region is important to Indigenous Peoples	active presence and agency in exercising their rights & title and stewardship responsibilities.	in the current working draft.
PART 2: Guiding Principles – 2.1.1 – Acknowledge and Respect Indigenous Rights		
To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples in decision making, and to work together with Indigenous governing bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species	Suggestion to reference “Indigenous rights and Title.”	Draft section 1-3 - Indigenous Inherent Rights Acknowledgement has been revised with the following additional clause: “Islands Trust Council is committed to advancing reconciliation with Indigenous Governing Bodies through ongoing discussion and recognition of these rights.”
PART 2: Guiding Principles – 2.1.8 – Foster Informed and Balanced Decision Making		
To be informed by a broad range of sources in its decision making processes, including the best available science, Indigenous Knowledge, and local community knowledge.	Suggestion to amend wording to: “Including the best available Indigenous Knowledge, Institutional Knowledge, and local community knowledge.”	Draft guiding principle 2.1.7 has been revised as follows: Foster Informed and Balanced Decision Making <i>To be informed by a broad range of sources in its decision-making processes, including Indigenous Knowledge, institutional knowledge, local community knowledge, and science</i> Staff do not recommend removing the term ‘science’ as the term ‘institutional knowledge’ alone may introduce confusion, in that it may be viewed to mean the collective understanding of Islands Trust and/or some other institution, rather than speaking to the general definition of science. Science is only meant to be considered as one of broad range of sources.
PART 2: Reconciliation Principles – 2.3.		

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
	Suggestion to add two additional subsections: add 2.3.4 DRIPA, 2.3.5 Section 35 Rights	To address comments from K'ómoks FN and other Indigenous Governing Bodies Section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Draft guiding principle 2.2.2 states that "Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)."
PART 3: Goals and Directive Policies – 3.2.1 – Indigenous Cultural Heritage Sites		
Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, middens, cairns, petroglyphs and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.	Suggested wording change: Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, cemetery sites, camp sites, petroglyphs and pictographs, fish traps, clam gardens, culturally modified trees, and all known (registered), unregistered, or newly discovered archaeological sites.	Directive policy 3.2.1 and advisory policy 3.2.3 have been revised to add "camp sites" after "burial sites"
PART 3: Goals and Directive Policies – 3.2.3 – Other Culturally Significant Areas for Indigenous Peoples		
Identify and protect areas of importance for Indigenous cultural, spiritual, and ceremonial practices.	Suggested wording change: Identify and protect areas of importance for	Draft directive policy 3.2.1 and advisory policy 3.2.3 have been revised to add "camp sites" after "burial sites" Gathering of plants and medicines is captured in 3.2.5:

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
	Indigenous cultural, spiritual, and ceremonial practices, including but not limited to, transformation sites, village sites, cemetery sites, camp sites, petroglyphs and pictographs, fish traps, clam gardens, culturally modified trees, and all known (registered), unregistered, or newly discovered archaeological sites. Additional wording change: Add cultural and medicinal gathering areas.	Indigenous Cultural Heritage Sites <i>Through engagement with Indigenous Governing Bodies, identify and prioritize protection of Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, camp sites, middens, cairns, petroglyphs, culturally modified trees, fish traps, clam gardens, and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.</i>
PART 3: Goals and Directive Policies – 3.3.3 – Forest Ecosystems		
Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forest ecosystems, with particular focus on remaining stands of relatively undisturbed Coastal Douglas-fir and Coastal Western Hemlock and their associated ecosystems.	Suggested addition: Add Garry Oak ecosystem.	Draft directive policy 3.3.4 has been added to address this comment: Coastal Oak and Prairie Ecosystems <i>Identify and prioritize the preservation and protection of coastal oak and prairie ecosystems, with a particular focus on their maintenance, restoration and management of their ecological integrity.</i>
PART 3: Goals and Directive Policies – 3.4.3 – Impacts of Development		
Consider the aesthetic, environmental, and social impacts of development.	Suggested change: "Consider the cultural heritage/impacts to Indigenous land use, aesthetic, environmental, and social impacts of development."	Draft policies 3.1.1 and 3.2.1 to 3.2.3 will already require local trust committees and island municipalities to use regulatory tools and engagement processes to mitigate and limit the impact of development on Indigenous heritage and cultural sites.
PART 3: Goals and Directive Policies – 3.4.17 – Septic Fields		

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
Establish requirements for the location and siting of new septic fields to mitigate adverse impacts on the area's unique amenities and environment, including Indigenous Peoples' food security in Indigenous marine harvesting areas.	Suggested change: "Establish requirements for the location and siting of new septic fields and tanks to mitigate adverse impacts on the areas Indigenous significance, unique amenities and environment, including impacts to Indigenous cultural heritage sites and Indigenous Peoples' food security in Indigenous marine harvesting areas.	Draft policy 3.4.25 addresses this comment: Wastewater Disposal Systems <i>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.</i>
PART 3: Goals and Directive Policies – 3.5.15 – Soil and Fill from Middens and Foreshore Areas of Cultural Significance		
Prohibit alteration, removal or excavation of soil or fill from middens or foreshore areas identified as culturally significant areas	Suggested change: "Prohibit alteration, removal or excavation of soil or fill from all archaeological sites including midden, or foreshore areas identified as culturally significant." Comment: This would be illegal anyways under the HCA unless proper permits were granted. Probably should be completely updated.	Draft directive policy 3.5.15 has been revised to read: Soil and Fill from Middens and Foreshore Areas of Cultural Significance <i>Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.</i>
PART 3: Goals and Directive Policies – 3.5.18 – Soft Shoreline Protections		
Consider and foster soft shoreline approaches first such as those identified by the "Green Shores" program to set requirements for shoreline preservation	Suggested change: "Consider and foster soft shoreline approaches first such as those identified by the "Green Shores" program to set requirements for shoreline preservation and to mitigate erosion of shoreline and foreshore cultural heritage sites."	Draft directive policy 3.5.18 has been revised as follows: Soft Shoreline Protections <i>Prioritize and foster soft shoreline approaches, such as those identified by the "Green Shores" program, to set requirements for shoreline preservation, and to mitigate erosion of shoreline and foreshore cultural heritage sites.</i>

K'ómoks First Nation		
Text from September 2023 version	K'ómoks comment	Comments from Islands Trust Staff
Glossary of Terms - Middens		
Middens are the heaps of shells, bones, utensils and artifacts that accumulated sometimes over thousands of years of Indigenous Peoples' occupation of a site. Indigenous Peoples were originally thought to be nomadic but the existence and dates of middens are proof positive that some Indigenous Peoples occupied their villages year round. In British Columbia, all middens are protected if they contain artifacts, features, materials or other physical evidence of human habitation or use before 1846. Protection means that a permit is required to alter the site. There are approximately 5700 recorded shell midden sites in the province, and thousands of additional sites that have not been identified to date. (Source: Indigenous Corporate Training Inc.)	Comment: Decolonize the definition of middens to make explicit that ancestral remains are often found within them and they are more than merely "garbage heaps". Comment: Note that middens may be archaeological indicators of village and burial sites.	In response to comments from K'ómoks Nation and other Indigenous Governing Bodies, the glossary definition of "middens" is drafted as follows: <i>Midden, or 'shell midden' archaeological sites are indicative of past First Nations settlement activity. Formed by the accumulation of stratified cultural deposits over thousands of years, shell midden sites represent some of the most complex archaeological sites in the world.</i> <i>Source: McLay et al (2008) A'lhut tu tet Sul'hweentst Respecting the Ancestors</i> <i>Note: A midden may be an archaeological indicator of village and burial sites, and may contain ancestral remains</i>

K'ómoks First Nation	
July 2021 version	Comments from Islands Trust Staff
Highlights of comments	
Exclusive access to traditional places, plants, animals, and harvesting rights	Local trust committees and island municipalities are unable to zone to provide exclusive access.
RE unique amenities definition : protection on culturally significant lands, (eg. shell middens, CMT, culturally sensitive plants, resources, places. with no development and FN access.	Term no longer defined in the draft document. The term unique amenities is inclusive of cultural heritage of Indigenous Peoples.

K'ómoks First Nation	
July 2021 version	Comments from Islands Trust Staff
Re list of cultural resources to protect: ceremonial resources such as ochre; medicinal and culturally significant plants used in ceremony.	Draft advisory policy 3.2.8 has been revised to add “and ochre” at the end.
Re roles and responsibilities: First Nations play an important role in contributing to the preservation and protection of the unique amenities and environment of the Trust Area, and have long history, knowledge with their traditional lands.	This section has been removed.
Access to all traditional areas for harvesting rights and ceremonial rights in FN traditional territory is important	Protection of culturally significant species and medicinal plants is addressed in draft advisory policy 3.2.8, and culturally significant areas in 3.2.5.
Need for protection of traditional medicinal plant harvest	Protection of culturally significant species and medicinal plants is addressed in draft advisory policy 3.2.8, and culturally significant areas in 3.2.5.
Need for protection of First Nation cultural harvesting areas, cultural significant places, archaeological sites	Protection of culturally significant species and medicinal plants is addressed in draft advisory policy 3.2.8, and culturally significant areas in 3.2.5. Archaeological sites addressed in draft directive policy 3.2.1 and advisory policy 3.2.4.

Lyackson First Nation (see also below feedback provide verbally by Quw'utsun Nation members to Islands Trust staff)	
Text from May 9, 2024 letter to CAO	Comments from Islands Trust Staff
I was pleased to respond to your invitation dated January 23, 2023, to participate in Phase 3 early engagement on draft 2 of the Islands Trust Policy Statement Bylaw No. 183 (the “Policy Statement”). Subsequent to your letter there was a delay of many months, due, we understand, to staffing capacity constraints within Islands Trust and Phase 3 was re-initiated in August, 2023. At about the same time, Islands Trusts representatives sought Lyackson First Nation’s advice on how to improve engagement with local Indigenous communities. I am writing at the request of Lyackson First Nation Chief and Council to share our experience and additional feedback with you.	This feedback was provided to Trust Council which chose to continue with project implementation as originally intended but with an extended 6 month referral period after First Reading. Staff have not been able to sustain a close working relationship about the Policy Statement Amendment Project with Lyackson First Nation staff (or any other Indigenous Governing Body’s staff) due to staff vacancies and general workloads.
Immediately last August, Lyackson First Nation staff again signalled that the proposed	To address comments from Lyackson First Nation and

Lyackson First Nation (see also below feedback provide verbally by Quw'utsun Nation members to Islands Trust staff)	
Text from May 9, 2024 letter to CAO	Comments from Islands Trust Staff
timelines were inadequate. Indeed, we expressed our hope that Islands Trust would have been working through the resolutions and Phase 2 comments with First Nations, in collaboration with our communities and from a rights-recognition perspective. We also reminded Islands Trust that the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) – brought into force in BC through the Declaration on the Rights of Indigenous Peoples Act – affirms nations' right to participate in decision-making matters and requires obtaining our nations' free, prior and informed consent on decisions that impact our territory and our people. We further noted that this consent cannot be obtained when unilateral decisions made by local governments create timelines that do not work for the nations - that do not allow for infringements on our rights to be properly considered or for our communities to be fully engaged. Meaningful consultation and obtaining consent for the work at every point in the process can only occur where timelines are co-developed with nations and with respect to the nations' needs. As you must be aware, the Policy Statement gets into the core of UNDRIP and our Lyackson First Nation leadership being able to exercise its decision-making rights in its territory. We reminded you that throughout the entire process, the inherent right of Indigenous nations to be self-governing decisionmakers within our respective territories needs to be at the forefront. Thus, the process needed to be codesigned, at every step, with participating Indigenous nations, with the full recognition of our authority and jurisdiction within our territories. Further, as Islands Trust claims jurisdiction over much of the Quw'utsun Nation's territory and in consequence your decision-making impacts our aboriginal rights and title, recognition of our inherent right as decision-makers in our territory and meaningful engagement with our Nation by Islands Trust is of great importance. To remind you, Lyackson First Nation has been actively involved in the Policy Statement work since at least 2021. More recently, staff, along with technical representation from other Quw'utsun Nation communities, engaged in good faith in the review and provision of feedback on draft 2 of the Islands Trust Policy Statement. While there are improvements over the 1994 Policy Statement, there is still much work to be done. We note that many of the detailed comments provided in Phase 2 were not incorporated into Phase 3 and no rationale was given as to why they were not addressed. This lack of	other Quw'utsun Nation members, and other Indigenous Governing Bodies draft section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Draft guiding principle 2.2.2 states that "Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)."

Lyackson First Nation (see also below feedback provide verbally by Quw'utsun Nation members to Islands Trust staff)	
Text from May 9, 2024 letter to CAO	Comments from Islands Trust Staff
engagement is disrespectful to the work our teams put into the work, is harmful to our relationship with Islands Trust and is contrary to achieving our communities' free, prior and informed consent on decisions made in our territory. In many instances our feedback was misunderstood or misinterpreted, necessitating lengthy explanation and discussion. For clarity, we fully endorse Cowichan Tribes' April 10, 2024, written comments, along with our own verbal and written feedback, which we hope finds it way into the staff reports. I am sure you can appreciate Lyackson First Nation's reluctance to endorse a policy that does not recognize our inherent rights or that is not deeply rooted in relationship with Indigenous communities. In closing, I would like to remind you that if Islands Trust is truly committed to achieving reconciliation with Lyackson First Nation, it must recognize the importance of co-developing processes, including timelines, to work collaboratively with our Quw'utsun Nation member communities to co-draft the Islands Trust Policy Statement over the next five years. It is with this commitment that Lyackson First Nation could accept the current draft 2 as an interim policy, one to be adopted pending further collaboration with our communities. In this way, Islands Trust acknowledges the current iteration does not go far enough, but also that it could be a first step toward true partnership with our communities to do this work in a purposeful and fully resourced manner.	Trust Council 's 2025-2028 Strategic Plan includes key initiative 1.1.2, , <i>"Work with Indigenous Governing Bodies to co-design and implement a Policy Statement amendment review process that ensures ongoing and more regular review and amendment of the Policy Statement"</i>. (colour coded to indicate that the initiation timeline is to be determined)

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
Highlights of comments (As Lyackson commented on a version with Cowichan Tribes' comment, where comments have already been addressed in Cowichan Tribes' section above, not included here)	
In 2019, the Province committed to aligning its laws with the Declaration on the Rights of Indigenous Peoples Act; how is Islands Trust ensuring that the Islands Trust Act is consistent with the Declaration? The expectation is that this recognizes a right to free, prior and informed consent, how will this be reflected in the New Policy Statement?	No change per limitations of existing legislation. To address comments from K'omoks FN and other Indigenous Governing Bodies draft section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document.

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
	Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”
Re: Present context section: Elaborate on seeking guidance from Elders and leaning on TK. And also that this work must be paid for.	Guiding principle 2.1.1 addresses working with Indigenous Knowledge Holders. Trust Council will need to consider a policy on capacity funding to guide future decisions about providing funding to Indigenous Governing Bodies to support engagement/cooperation.
Re: Present context section: The document also needs to address governance and stewardship desires and role of Nations.	Generally addressed in draft section 1.3 Indigenous Inherent Rights Acknowledgment
Re: Present context section: It would be good to see the TC prioritize finding solutions for Indigenous housing needs	Draft directive policy 3.4.12 has been revised to read: Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> Draft advisory policy 3.4.17 has been added which says Housing for Indigenous People <i>Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.</i>

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
Re: Present context section re role of Policy Statement: This should also capture the Indigenous concept of caring for ancestors (especially in context of culturally rich and archaeologically sensitive spaces and resting places of ancestors).	The last sentence of the introduction for Goal 2 has been revised as follows: This section lays out general types of Indigenous cultural heritage and culturally significant areas, sites, and species that should be identified and protected in each local planning area; this should be guided by Indigenous Peoples, Indigenous governing bodies and Indigenous Knowledge Holders and undertaken in a culturally sensitive manner that respects confidentiality protocols around the sharing of Indigenous Knowledge, and that many of these places are the resting places of ancestors.
In situations where there has been significant degradation, we look to regenerate and restore to previous levels (be it wildlife, fish and fish habitat, lands, cultural spaces	The concept of restoration has been added through the draft document.
It is not always appropriate to identify Indigenous spaces used for harvest / cultural or ceremonial purposes	The draft new Policy Statement includes directives that begin with “Identify and protect” which identify typically intended to mean identify on a map. Where the ‘identifying’ requires engagement with an Indigenous Governing Body the topic is addressed through an advisory policy which provides flexibility. Approaches to identification and protection of cultural values will depend on direction from IGBs.
Use of the descriptor 'traditional' in this case may indicate that harvesting is in the past. Many FN people still harvest in the IT area, and many who do not, would like opportunities for them or their descents to harvest here	The word tradition no longer appears in the draft document.
Should not prioritize enjoyment of residents and visitors above local Indigenous communities.	The draft document attempts to accommodate this value in the directive policies 3.4.27, as “unique amenities” is understood to include Indigenous cultural heritage and harvesting areas.

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
Some local Indigenous communities want to decide how they develop their land (e.g. economic development opportunities) it's not simply about preserving and protecting for some it's about thriving	Draft advisory policy 3.4.10 has been added to address this issue.
Islands Trust also needs to work toward building trusting relationships especially with First Nations.	Staff agree we need to do better.
It's important to state that the Trust Policy Statement was conceived and developed by IT and only afterwards were Indigenous people consulted. In this way, the approach and design are not Indigenous-led. There needs to be a commitment that, going forward, Indigenous perspectives and voices will be involved at the problem identification, design, concept phases right through to decision making	Trust Council 's 2025-2028 Strategic Plan includes key initiative 1.1.2, , <i>“Work with Indigenous Governing Bodies to co-design and implement a Policy Statement amendment review process that ensures ongoing and more regular review and amendment of the Policy Statement”</i> . (colour coded to indicate that the initiation timeline is to be determined)
It's not simply engagement with FNs, but collaboration, cooperation, deep relationship building, support	Staff agree we need to do better.
Roles and responsibilities section -multiple mentions of lack of reference to First Nations and FN membership	The referenced section has been deleted from the current document.
See previous comment re: alignment with DRIPA. What activities are underway to jointly assign to Islands Trust Council and First Nations?	Trust Council and the Islands Trust Conservancy Board may wish to consider activities they can undertake in partnership with First Nations.
First Nations should have a formalized role in the Policy Statement implementation process.	See Part 4 of the draft Policy Statement on implementation.
Islands Trust could divert a portion of funding to First Nations, as an alternative to funding land back measures	New advisory policy 3.1.3 has been added as follows: Land Back <i>Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies as an amenity contribution in applications seeking additional development potential.</i>

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
	Additionally, Trust Council may wish to consider opportunities to support First Nations financially – it can give financial assistance to others to do any of the following: (i)engage in activities to gain knowledge about the history and heritage of the trust area and to increase public awareness, understanding and appreciation of the history and heritage; (ii)conserve heritage property; (iii)engage in activities to gain knowledge about the unique amenities and environment of the trust area and to increase public awareness, understanding and appreciation of the unique amenities and environment; (iv)preserve and protect the unique amenities and environment of the trust area,
Throughout the document it feels like the authors just tacked on "Indigenous" it doesn't feel like Indigenous concepts were at the forefront.	Document has been redrafted with this feedback in mind.
Re Precautionary principle: What about Indigenous stewardship?	The concept of Indigenous stewardship is not in the draft Policy Statement but new advisory policy 3.2.6 has been added as follows: Indigenous Harvesting and Hunting Area Access <i>Through engagement with Indigenous Governing Bodies, identify and pursue opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas</i>
Local autonomy for local trust committees and island municipalities must be exercised within an Indigenous construct.	This section is no longer in the draft document.
Provide an additional statement saying that although there are a large number of culturally important species, access to FNs is often restricted or altogether absent in order for them to harvest important materials, foods and medicines.	Although this statement is not included, draft advisory policy 3.2.6 addresses opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
Re commitment of Trust Council re forest ecosystems being protected and maintained and the aesthetic value of forests should be maintained: This potentially fetters Indigenous logging (economic development) and infringes on exercise of Aboriginal cultural practices (e.g. Culturally Modified Trees)	This policy has been removed from the draft Policy Statement.
Cultural monitors should be used to prevent damage to archaeological sites	New advisory policy 3.2.9 has been added as follows: Cultural Monitors <i>Through engagement with Indigenous Governing Bodies, support opportunities for cultural monitors to be present for ground-disturbing activities.</i>
Development, activity, buildings, or structures should not result in impacts to Aboriginal Rights of an Indigenous person	Draft Guiding Principle 2.1.1 speaks to respecting Indigenous rights.
Lyackson First Nation disagrees with all new private docks until there is a Cumulative Effects Impacts Assessment (CEIA). If a homeowner chooses to buy / build on boat access only, that is their choice. There should be no reasonable expectation of a private dock on unceded territory. Decisions that do not take into account the cumulative effects are inconsistent with the Blueberry River Supreme Court decision. We would like Islands Trust to support a Cumulative Effects Impact Assessment of private moorages prior to approving / allowing any new docks, including those not requiring permits. Lyackson First Nation would like to see a reduction in approval of private moorages	Current draft directive policy 3.5.25 concerning was revised as follows: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>
Would like to see Island Trust seek to use Traditional Knowledge and traditional practices to inform "western scientific" approaches.	Guiding Principle 2.1.7 has been revised as follows: Foster Informed and Balanced Decision Making <i>To be informed by a broad range of sources in its decision-making processes, including Indigenous Knowledge, institutional knowledge, local community knowledge, and science.</i>
Careful consideration should be given to approving development on properties that are boat-access only, with an eye to approval on a very limited basis.	Draft directive policy 3.3.8 calls for identification and prioritization of the preservation, protection, and restoration of islets and small islands.

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
Support prohibition on seawalls and other hard shoreline armouring except where may be required to protect Indigenous cultural space.	Islands Trust Council has signaled that it is not prepared to direct local trust committee and island municipalities to prohibit seawalls and other hard shoreline armouring in the Islands Trust Area, nor is it prepared to mandate Green Shores approaches to managing shoreline erosion. However, should this position change staff could provide previously-considered policy language. However, draft directive policy 3.5.21 has been revised as follows: Soft Shoreline Protections <i>Prioritize and foster soft shoreline approaches, such as those identified by the “Green Shores” program, to set requirements for shoreline preservation, and to mitigate erosion of shoreline and foreshore cultural heritage sites.</i>
Would like to see the addition of support the prohibition /increase in disposal at sea sites	Trust Council has removed advocacy policies from the draft new Policy Statement.
It is not enough to merely engage but provide funding to support meaningful engagement	Trust Council will need to consider a policy on capacity funding to guide future decisions about providing funding to Indigenous Governing Bodies to support engagement/cooperation.
It's important to not fall into pan indigeneity. Where we have said Indigenous, it is intended to generally reference local (those with Title) Indigenous populations.	Document has been redrafted with this feedback in mind.
Public access to beaches and areas of recreational significance should be subject to agreement with local First Nations (for example, Winter Cove on Saturna Island is a traditional harvesting ground that has been deteriorated by settler use)	Draft directive policy 3.1.1 sets out that local trust committees and island municipalities must engage with Indigenous Governing Bodies when developing bylaws. An OCP will typically contain a map that shows current and desired future access routes to recreational areas – often developed in partnership with the regional district or a local advocacy group –

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
	and potentially a corresponding policy that rezonings should be leveraged to secure these access routes for public use. As part of the bylaw referral process, or perhaps earlier as such a map is being developed, IGBs would have the opportunity to provide comment if there are proposed public access routes that they find to be unsuitable and the map could be amended.
All of the directive policies could start with : Subject to consultation and meaningful engagement with local Indigenous Nations ...	Draft directive policy 3.1.1 states that local trust committees and island municipalities must engage with Indigenous Governing Bodies and provide a record of the engagement at time of bylaw submission. Draft advisory policy 3.1.2 states that local trust committees and island municipalities must engage with Indigenous Governing Bodies on discretionary planning and land use management decisions.
Directives must acknowledge shared stewardship moving towards Indigenous governance. This is not the local trust committees and island municipalities doing the work on their own. Where is reference to Indigenous leadership?	Draft directive policy 3.1.1 states that local trust committees and island municipalities must engage with Indigenous Governing Bodies and provide a record of the engagement at time of bylaw submission. Draft advisory policy 3.1.2 states that local trust committees and island municipalities must engage with Indigenous Governing Bodies on discretionary planning and land use management decisions.
Economic Activities policy should include: and support economic development opportunities for Indigenous people	A new draft advisory policy 3.4.10 has been added as follows: Economic Development Opportunities for Indigenous

Lyackson First Nation	
July 2021 version	Comments from Islands Trust Staff
	Communities <i>Through engagement with Indigenous Governing Bodies, support economic development opportunities for Indigenous communities</i> Draft directive policy 3.4.7 address economic activities more generally: Economic Activities <i>Support sustainable economic activities that are compatible with the preservation and protection of the Trust Area and its unique amenities, environment, community health, and that consider transportation and infrastructure capacity</i>
Community Facilities and Services policy should include: and acknowledge the need to prioritize services for Indigenous people	Draft directive policy 3.4.4 has been revised to read: Community Facilities and Services Ensure that each island community's, and local Indigenous communities' current and projected long-term needs for educational, institutional, community, health, cultural, recreational facilities and services, and outdoor recreation are considered and planned for. Islands Trust has no powers associated with prioritizing community services for Indigenous People.
More than safeguarding Indigenous cultural heritage, the expectation is that Islands Trust will through co-governance (leading to governance) find opportunities to incorporate Indigenous peoples, cultural and knowledge into its policies.	Draft policies 3.1.1 , 3,1.2 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies. Staff acknowledge the need to work in deeper

Lyackson First Nation		
July 2021 version		Comments from Islands Trust Staff
		relationship with Indigenous Governing Bodies.
There should be a priority on providing housing for Indigenous people.		Draft advisory policy 3.4.17 has been added as follows: Housing for Indigenous People <i>Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.</i>

Malahat First Nation		
Text from September 2023 version	MÁLEXEŁ comment	Comments from Islands Trust Staff
Part 2: Guiding Principles – 2.2 Cooperation Principles		
2.2.5 Provide Public Education Opportunities (p.12) <i>To provide education opportunities to Islands Trust Area residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the region's unique amenities and environment, while respecting the confidentiality interests of Indigenous Peoples and Indigenous governing bodies.</i>	Glad to see this is included in the list of principles: A couple items to consider for public education - incorporating Indigenous place names, and reverting back to the Indigenous (original place names) is one way to decolonize people's perspectives, as well as providing tools and resources on how to pronounce the place names such as phonetic spellings or QR codes connecting to recordings of the elders saying the place names. I think there needs to be more education and understanding of the laws and protections around heritage sites, too often cultural heritage sites are damaged by curious tourists or developers who choose to not notice impacts to an archaeological site	Trust Council may wish to address this feedback through future educational programs.
Part 2: Guiding Principles – 2.3 Reconciliation Principles (p. 13)		

Malahat First Nation		
Text from September 2023 version	MÁLEXEŁ comment	Comments from Islands Trust Staff
General comment	Why is DRIPA not included in this?	Revisions made within the limits of existing legislation. Guiding Principle 2.2.2 has been added as follows: Guidance from United Nations Declaration on the Rights of Indigenous Peoples Be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). To address comments from Malahat First Nation and other Indigenous Governing Bodies Section 1.3 - “Indigenous Inherent Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies.
Principle E in Table 1 - Truth & Reconciliation Commission of Canada (TRC) – 10 Principles	Take out Traditional and just have "knowledge Keepers"	This table has been removed from the document.
Principle G in Table 1 - Truth & Reconciliation Commission of Canada (TRC) – 10 Principles	add relationship building	This table has been removed from the document.
PART 3: Goals and Directive Policies - Goal 2: Preserving and Protecting Indigenous Cultural Heritage and Culturally Significant Areas, Sites, and Species		
3.2.2 Indigenous Harvesting Areas <i>Identify and protect Indigenous harvesting areas on land and marine foreshores including, but not limited to, fish weirs, clam gardens,</i>	Culturally Modified Trees	This suggestion is incorporated in draft policy 3.2.1 and 3.2.4.

Malahat First Nation		
Text from September 2023 version	MÁLEXEŁ comment	Comments from Islands Trust Staff
<i>camas meadows, and other areas used for Indigenous hunting, fishing, trapping, and gathering of plants and medicines</i>		
3.2.4 Culturally Significant Species and Medicinal Plants <i>Identify and protect and support restoration of culturally significant species and medicinal plants.</i>	Supporting protection and restoration is vital. It would be great to see relationship and facilitation around opportunities for Community members to access areas to harvest medicinal plants, cedar etc. all too often Nation members are challenged by the public when they go out to harvest in "protected" areas. Public education needs to bring about an understanding that Nation members have a right to harvest	This suggestion is incorporated in draft policy 3.2.5 and 3.2.8.
PART 3: Goals and Directive Policies - Goal 3: Preserving and Protecting Healthy and Biodiverse Ecosystems		
3.3.1 Protected Area Networks <i>Identify, establish, and maintain a network of protected areas of sufficient size and distribution to preserve the environmental integrity of ecosystems in their planning area.</i>	Work with First Nations to support Indigenous Protected Areas	A new draft advisory policy 3.3.11 has been added to the draft policy statement as follows: Indigenous Protected and Conserved Areas Support Indigenous Governing Bodies in the establishment of Indigenous Protected and Conserved Areas
PART 3: Goals and Directive Policies - Goal 4: Fostering Sustainable, Inclusive, and Resilient Communities		
3.4.5 Climate Change Mitigation and Adaptation <i>Identify land use strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.</i>	Public education on water conservation	Addressed outside of the draft new Policy Statement as part of Islands Trust Council's Stewardship Education Program .

Malahat First Nation		
Text from September 2023 version	MÁLEXEŁ comment	Comments from Islands Trust Staff
3.4.9 Appropriate Locations for Densification <i>Identify appropriate locations where density increases could support the development of safe, secure, diverse and affordable housing while reducing dependency on private automobile use, and increasing use of trail systems, public transportation, and active transportation, and without adversely impacting the area's unique amenities and environment.</i>	With the Islands density of culturally and spiritually significant areas, extreme caution needs to be taken when it comes to housing on the islands. All too often the Archaeological branch approves permits that will alter cultural sites for housing construction in sacred sites	Draft directive policies 3.1.1, 3.2.1 and 3.2.3 may address these concerns.
PART 3: Goals and Directive Policies - Goal 5: Fostering Sustainable Stewardship of Lands and Waters		
3.5.6 Forest Lands for Sustainable Management <i>Retain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the area's unique amenities and environment</i>	Island Trust should be considering climate change adaptation when it comes to forest planning	Draft directive policies 3.4.5 and 3.5.10 may address this issue.
PART 4: Implementation - 4.2 – Policy Statement Amendments		
“Newly elected Trust Councils shall cooperate with Indigenous governing bodies, and may wish to engage with key partners and interested and affected parties across the Islands Trust Area to define priorities for Policy Statement amendments that term.”	The term "cooperate" should be replaced with a term such as collaborate	The Islands Trust Act supports the term ‘cooperate’, and staff understand that shifting to the term ‘collaborate’ may require legislative amendment to support a shift to co-governance, or signing of a section 7 agreement under the Declaration Act. In section 1.3, Trust Council has respectfully acknowledged the expressed interest of Indigenous Governing Bodies in working toward co-governance of the Islands Trust Area

Malahat First Nation	
July 2021 version	Comments from Islands Trust Staff
Highlights of comments	
There are two main issues we noticed throughout the document: 1. the use of the term “heritage” for all Indigenous culture. This is too history-focused and Islands Trust needs to acknowledge modern traditions and culture; 2. the use of the term “Indigenous ways of knowing”. This sounds offensive. We don’t have the correct phrase but it could be “Indigenous knowledge, culture, and history that is reflective of the indigenous community’s needs and desires”	Document has been redrafted with this feedback in mind.
Re: Present context section: Add: First Nation community members were also put into reserves, where are usually far from their homelands and where resources are usually insufficient, if not scarce. The forced removal and genocide cut off Indigenous people's connection to their lands and traditions, and they continue to suffer from this.	This section was removed from subsequent drafts.
Roles and responsibilities section: Needs to acknowledge traditional laws and practices, historic inequalities	This section was removed from subsequent drafts.
Roles and responsibilities section: Needs to acknowledge need for capacity funding for engagement	This section was removed from subsequent drafts. Trust Council will need to consider a policy on capacity funding to guide future decisions about providing funding to Indigenous Governing Bodies to support engagement/cooperation.
Regional governance section: Ensure references to culture are not just about heritage – culture is ongoing and relevant. This is a fundamental disconnect with government organizations	This section was removed from the document. References in the draft document now suggest current cultural practices.
Regional Governance Policies: Move beyond engagement to coordinate, work together. Align with nations’ interests and concerns as well as DRIPA.	Draft Guiding Principle 2.1.1 calls for Trust Council to work together with Indigenous Governing Bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species.

Add 'no disturbance' to soil and fill policy	Draft directive policy 3.5.18 has been revised to read: Soil and Fill from Middens and Foreshore Areas of Cultural Significance <i>Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.</i>
Aquaculture should be directed away from culturally significant areas	Addressed by draft directive policy 3.5.19.
Buildings and structures should be directed away from culturally significant areas.	Addressed in draft directive policies 3.1.1 and 3.2.1
Mention Douglas Treaty rights	To address comments from Malahat Nation and other Indigenous Governing Bodies draft section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document.
Growth and development should respect Indigenous culture, traditions, and knowledge	The draft new Policy Statement has been drafted to foreground consideration of Indigenous values by local trust committees and island municipalities in their land use planning decisions.

shíshálh Nation		
Text from September 2023 version	shíshálh comment (from notes from meeting)	Comments from Islands Trust Staff
General Comment		
General Comment	Broadly – principles and values laid out – are fairly well aligned with shíshálh values. For riparian and heritage values for the island specifically missing is actionable objectives and a resourcing plan	See Part 4: Implementation for implementation plan . The Policy Statement is meant to be a statement of general policies to inform political decisions. It is not at the level of detail of an action plan. The implementation section of the draft Policy

shíshálh Nation		
Text from September 2023 version	shíshálh comment (from notes from meeting)	Comments from Islands Trust Staff
	-between this and previous – much more broad and less specific – value to that and some flexibility – it doesn't necessarily translate in to the actionable items on skelhp -We think there are some really good guiding principles. -What we want is an actionable plan to make it happen.	Statement calls for the development of a detailed Implementation Plan.
Acknowledgement	Should be 'shíshálh Nation'	This change has been made
Part 2: Guiding Principles – 2.1 General Guiding Principles		
2.1.1 Acknowledge and Respect Indigenous Rights To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples in decision making, and to work together with Indigenous governing bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species.	Clarify – acknowledgement of the underlying indigenous title. Notice its absence	Draft section 1-3 - Indigenous Inherent Rights Acknowledgement has been revised with the following additional clause: <i>"Islands Trust Council is committed to advancing reconciliation with Indigenous Governing Bodies through ongoing discussion and recognition of these rights."</i>
2.1.2 Prioritize Environmental Protection To place priority on preserving, protecting and restoring the environment in all decision making. 2.1.3 Prioritize Indigenous Cultural Heritage Protection To place priority on preserving, protecting and supporting restoration of Indigenous cultural heritage in all decision making.	Really happy to see these included. This "acknowledging the interdependencies between healthy communities and healthy ecosystems." is a core shíshálh world view. Precautionary principle is very important to the shíshálh. Where they are unclear – we err on side of caution rather than risk impacts	Document has been redrafted with this feedback in mind.

shísháhl Nation		
Text from September 2023 version	shísháhl comment (from notes from meeting)	Comments from Islands Trust Staff
2.1.5 Foster Sustainable, Inclusive, and Resilient Communities To support land use planning decisions that foster sustainable, inclusive, and resilient communities, acknowledging the interdependencies between healthy communities and healthy ecosystems. 2.1.6 Take Guidance From the Precautionary Principle To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there may be uncertainty over the threats of serious or irreversible damage from development. 2.1.7 Account for Cumulative Effects To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats. 2.1.8 Foster Informed and Balanced Decision Making To be informed by a broad range of sources in its decision making processes, including the best available science, Indigenous Knowledge, and local community knowledge.		

Part 2: Guiding Principles – 2.2 Cooperation Principles		
2.2.2 Work Towards Collaborative Governance with Indigenous Governing Bodies To work towards building strong relationships and foundations for collaborative governance with Indigenous governing bodies, including through the development of shared decision-making agreements under the Declaration on the Rights of Indigenous Peoples Act.	Good to see this: “shared decision-making agreements under the Declaration on the Rights of Indigenous Peoples Act.”	Document has been redrafted with this feedback in mind.
Part 2: Guiding Principles – 2.3 Reconciliation Principles (p. 13)		
General comment	Broadly good	Document has been redrafted with this feedback in mind.
Table 2 – Applicable UN Declaration on the Rights of Indigenous Peoples (UNDRIP) Articles ²	Article 18 should be included - right to participate in the decision making	The table of specific UNDRIP policies has been deleted and replaced with a general reference to UNDRIP in reconciliation principle 2.2.2 as follows: <u>Guidance from United Nations Declaration on the Rights of Indigenous Peoples</u> Be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
PART 3: Goals and Directive Policies - Goal 1: Advancing Reconciliation		
Direction Policies – Reconciliation – general comment	Need to address the gap - what does this actually mean to do 3.1.2 – will residents and IT decision makers actually listen? -what is a significant land use decision; what does cooperate mean? -cooperate can mean different things for lots of people including Indigenous nations Development permits are a particular problem	Draft policy 3.1.2 was revised and reference to “potential significant impacts” has been removed.

3.1.2 Cooperate with Indigenous Governing Bodies Cooperate with Indigenous governing bodies on significant discretionary land use decisions that may impact their territories and the ecological health of the Salish Sea, and when addressing all Policy Statement directive policies (i.e. those under Part 3's Goals 2, 3, 4, and 5)	How can we make this actionable? How does consent fits in?	Draft advisory policy 3.1.2 has been revised as follows: Cooperate with Indigenous Governing Bodies Engage with Indigenous Governing Bodies on discretionary planning and land use management decisions that may have potential significant impacts on Indigenous Governing Bodies' territories or the ecological health of the Islands Trust Area. This is an advisory policy and Indigenous Governing Bodies can advise us if they don't want referrals about lot line changes or other minor matters.
PART 3: Goals and Directive Policies – Goal 2: Preserving and Protecting Indigenous Cultural Heritage and Culturally Significant Areas, Sites, and Species		
General comment on Part 3, Goal 2	Broadly good	Document has been redrafted with this feedback in mind.
3.2.1 Indigenous Cultural Heritage Sites Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, middens, cairns, petroglyphs and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.	Sometimes there is confidential information – shíshálh wants to be asked. The mapping sounds good in theory – but don't want to rely on non shíshálh people to interpret shíshálh data	The methods to “identify” will be addressed as part of implementation.
3.2.2 Indigenous Harvesting Areas Identify and protect Indigenous harvesting areas on land and marine foreshores including, but not limited to, fish weirs, clam gardens, camas meadows, and other areas used for Indigenous hunting, fishing, trapping, and gathering of plants and medicines.	So good to see this. How can we work that harvesting areas that continue to be and become accessible again? There were lots of stories about hunting deer on skelhp. Another issue is trails on crown land. Unsanctioned trails are very difficult and can impact cultural harvesting. A concern is that when trails become sanctioned, there are impacts to hunting zones.	Addressed by draft directive policies 3.2.5 and 3.2.6

	All nature reserves need to include access to/for Indigenous People	
PART 3: Goals and Directive Policies - Goal 3: Preserving and Protecting Healthy and Biodiverse Ecosystems		
<i>General comment on Goal 3</i>	They are good.	Document has been redrafted with this feedback in mind.
3.3.2 Sensitive Ecosystems Identify and prioritize the preservation, protection, and restoration of sensitive ecosystems in the Islands Trust Area, classified as the following ecosystem types: cliff; freshwater; herbaceous; old and mature forest; riparian; wetland; and woodland.	Old and mature forests are a high priority for shíshálh Identifying will take a lot of resources	Document has been redrafted with this feedback in mind.
3.3.3 Forest Ecosystems Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forest ecosystems, with particular focus on remaining stands of relatively undisturbed Coastal Douglas-fir and Coastal Western Hemlock and their associated ecosystems.	Coast Douglas-fir ecosystems are a high priority for shíshálh	Document has been redrafted with this feedback in mind.
PART 3: Goals and Directive Policies - Goal 4: Fostering Sustainable, Inclusive, and Resilient Communities		
General re development	Sprawl can negatively impact access to harvesting areas and hunting.	Document has been redrafted with this feedback in mind.
3.4.23 Trail Systems Identify appropriate locations, types, and safe public access to public pedestrian, equestrian and bicycle trail systems to support active recreation that are compatible with preservation and protection of the area's unique amenities and environment.	Need to address this not adversely impacting indigenous cultural heritage and harvesting	Document has been redrafted with this feedback in mind. Draft policies 3.2.1 to 3.2.3, as well as advisory policies 3.2.4 and 3.2.5 address this issue. .
3.4.24 Public Shoreline Access	Need to address this not adversely	Document has been redrafted with this feedback in

Identify and protect areas providing safe public access to marine shorelines and along marine shorelines that are appropriate for low-impact, public recreational use and do not adversely impact unique amenities and the environment.	impacting indigenous cultural heritage and harvesting	mind. The combined effect of draft directive policies 3.1.1 and 3.2.1 through 3.2.8 should address this issue.
PART 3: Goals and Directive Policies - Goal 5: Fostering Sustainable Stewardship of Lands and Waters		
General comment	Broadly good, but start to see “strive to” language. This is important stuff.	Document has been redrafted with this feedback in mind.
3.5.5 Freshwater Uses Strive to ensure that freshwater use is not to the detriment of other uses of the waterway such as fish and fish habitat uses, Indigenous cultural and spiritual uses, aesthetic and recreational uses, and the maintenance of water quality in lakes, streams, and wetlands.	This policy is important Recreational use should not be prioritized over fish habitat. Fish and fish habitat, and indigenous cultural and spiritual uses are very important. Fish and fish habitat is always prioritized for shíshálh	Document has been redrafted with this feedback in mind.
3.5.15 Soil and Fill from Middens and Foreshore Areas of Cultural Significance Prohibit alteration, removal or excavation of soil or fill from middens or foreshore areas identified as culturally significant areas.	Recommend being more specific add “in consultation with indigenous governing bodies” at the end	The combined effect of draft directive policies 3.1.1 and 3.2.1 through 3.2.8 may effectively address this issue.
3.5.17 Setbacks from the Sea Consider the current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea.	Flag – DFO recommends minimum setback of 15m and protection from erosion shíshálh wants to see as a minimum of 15m and additional to consider impacts of sea level rise and storm surge	Trust Council declined to impose a specific marine setback on local trust committees and island municipalities. Draft policy 3.5.20, Setbacks from the Sea, currently reads: Setbacks from the Sea <i>Incorporate current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by the federal and provincial governments</i>

		Current provincial guidance on best practice for the Strait of Georgian Planning Area is that the building setback should be at least the greater of 15 m from the future estimated Natural Boundary of the sea at Year 2100. Where the sea frontage is protected from erosion by a natural bedrock formation, the development approving official may agree to modify setback requirements as recommended by a suitably qualified Professional Engineer experienced in coastal engineering. The Professional Engineer should fully consider all aspects of the coastal flood hazard associated with Year 2100 water levels including potential wave, debris and related splash impacts on buildings. This approval should be augmented through a restrictive covenant describing the hazard and building requirements, and including the Professional Engineer's report and a liability disclaimer. The setback may be increased on a site-specific basis such as for exposed erodible beaches and/or in areas of known erosion hazard.
3.5.21 Private Docks Limit or prohibit new private docks in areas identified as culturally significant by Indigenous governing bodies and Indigenous Knowledge Holders, in areas that provide critical habitat for species at risk, and in areas of recreational significance; and consider the cumulative effects of docks.	Like this policy and the 'culturally significant' element shíshálh highly encourages group moorages – like to see that sharing of coastal facilities and limiting private docks.	Draft policy 3.5.26 has been revised to read: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>
PART 4: Implementation - 4.1 – Policy Statement Implementation		
General comment on implementation	Resourcing; and how is 3.1.2 actioned No real mention of First Nations in this.	See draft Part 4: Implementation, specifically "Implementing Reconciliation" section. The Implementation section calls for the development of an Implementation Plan that will provide more detailed guidance on how the Policy Statement will be implemented.

Title Statutory Bylaw Referrals	Title might be misnamed – could call it internal process	Based on the comment received from shíshálh Nation, this title was updated in the new draft Policy Statement to read: <i>Statutory Bylaw Approval Process</i> .

Squamish Nation		
Text from September 2023 version	Squamish Nation's comment	Comments from Islands Trust Staff
General Comments		
PART 3: Goals and Directive Policies – 3.2.1 – Indigenous Cultural Heritage Sites		
Identify and protect Indigenous cultural heritage sites including, but not limited to, village sites, burial sites, middens, cairns, petroglyphs and pictographs, and known (registered), unregistered, or newly discovered archaeological sites.	[Note: This comment was provided without specific reference to sections and is taken to apply throughout the document] Further scrutiny and direction will be needed be towards the actual implementation of principles and goals relating to heritage sites and areas. The Gulf Islands that fall within Squamish territory (through Howe Sound, Átl'ka7tsem) have many recorded sites on them, but those have been discovered piecemeal and reactively in response to proposed developments. Oral traditions, cultural history, and archaeological evidence all support a picture of heavy indigenous use of these areas, especially along shorelines where high value properties are being expanded. Many of these areas have not had proactive study to determine their archaeological potential, and until that is done, we should treat all such areas as having high potential for archaeological or cultural values. Our goals for protection for both recorded and unrecorded sites in these areas would be for either:	Draft directive policies 3.1.1 and 3.2.1 to 3.2.8 may address the comments re. heritage protection concerns.

Squamish Nation		
Text from September 2023 version	Squamish Nation's comment	Comments from Islands Trust Staff
	1. Official protections for island areas with archaeological potential and the requirement for archaeological assessments to be done whenever there is development that would risk encounter a site. or 2. Broad AOA studies that could accurately determine with more precision the archaeological potential of the islands - specifically shoreline areas - and record any easily found sites. The results of such a study would provide us, the province, and Islands Trust with more detailed information to adjust the boundaries of areas of archaeological potential that require further assessment. These are our recommendations because existing provincial protections for archaeological sites are insufficient and reactive. The Squamish Nation is seeking a more proactive and protective approach in preserving its heritage. Separate discussions relating to Keats and Gambier have been fruitful in that respect. We would hope that Islands Trust can work with us on continuing that. It is imperative that all individual projects are uploaded to Squamish Connect for thorough analysis	

General Comments - Culture		
	[Note: This comment was provided without specific reference to sections and is taken to apply throughout the document] -Ensuring that the OCP includes a formal acknowledgment of the traditional territory of the Squamish Nation at the beginning of the document. -Squamish Language (sníchim) use in billboards, signages, and other platforms. -More Squamish place names for areas (engage with Language and Culture Department for all place names). -Training staff in Squamish values and history. -More procurement, business and employment benefits to Squamish businesses and members.	The following comments are not appropriate to address in the Policy Statement but relevant staff are aware of the requests: - Ensuring that the OCP includes a formal acknowledgment of the traditional territory of the Squamish Nation at the beginning of the document. - Squamish Language (sníchim) use in billboards, signages, and other platforms. - More Squamish place names for areas (engage with Language and Culture Department for all place names). - Training staff in Squamish values and history. - More procurement, business and employment benefits to Squamish businesses and members.
General Comments - Environment		
	The goals are high-level and inclusive of natural resources, and I agree with them. Draft 2.4 includes some environmental concerns missing in the policy statement 2003, such as kelp forests and eelgrass beds. Ensuring that all dock and riparian setback projects are uploaded on Squamish Connect for through analysis. - Engaging with Nation on case to case basis for all individual projects for Environmental analysis through Squamish Connect.	Request for engagement is addressed by draft policy 3.1.1.
PART 3: Goals and Directive Policies – Agriculture		
	SN recommends regularly revising and updating the usage of pesticides and buffer zones in agriculture, especially lands near water bodies and	Regulating the application of pesticides as part of a legitimate farm operation is not within Islands Trust jurisdiction. For more on the regulation of

	with a high potential for leaching under Goal 5, Agricultural lands.	pesticides by the federal and provincial government see this bulletin .
PART 3: Goals and Directive Policies – Freshwater		
	SN recommends exploring the opportunities for rainwater harvesting and replenishing groundwater aquifers in the new/ existing buildings wherever applicable under Goal 5, Freshwater.	New draft advisory policy 3.5.7 may address this issue: Freshwater Storage <i>Encourage freshwater storage in groundwater regions where the quality or quantity of groundwater is likely to be inadequate or unsustainable</i>
PART 3: Goals and Directive Policies – 3.4.1 – Sustainable Development		
Ensure development is compact, energy-efficient, and appropriately situated on the island and on the site in order to: • reduce dependency on private automobile use, and support increased use of trail systems, public transportation, and active transportation, and • be compatible with preservation and protection of the area’s unique amenities and environment	Suggested change: Development should also aim for ‘complete communities’ with all services as possible Development should be net zero carbon emissions, low embodied carbon, pursue highest sustainability standards in all categories (including waste/water) and resilient to climate impacts	Draft policies 3.4.1 and 3.4.2 somewhat address the concept of compact, energy-efficient communities although no longer explicitly stated as a goal. To date Islands Trust Council has proven reluctant to impose a particular development pattern on the islands. There are tools, like greenhouse gas reduction development permit areas, that local trust committees and island municipalities can draw on to do what Squamish Nation proposes here. Staff are familiar with the Complete Communities concept, but it has not generally been considered applicable in the Islands Trust Area, where, except for on one or two of the larger islands, a full suite of services is not generally available to residents, or even considered desirable by them.

PART 3: Goals and Directive Policies – 3.4.5 – Climate Change Mitigation and Adaptation		
Identify land use strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.	Consider future drought in planning for development/water uses, sustainable use of water Consider minimizing waste and opportunities for reuse/repair/reduce, unbuilding standard for old structures	Draft directive policies 3.4.5 and 3.5.1 may address the comment. Regarding the comment about “minimizing waste and opportunities for reuse/repair/reduce, unbuilding standard for old structures”: Island OCPs could contain policies that encourage this, but in the Islands Trust Area, regional districts regulate building standards.
PART 3: Goals and Directive Policies – 3.4.6 – Hazardous Areas		
Identify areas hazardous to development activities, including, but not limited to, areas subject to flooding, erosion, wildfire, or slope instability, and direct development away from such hazards.	Incorporating climate impacts into these hazards Creating and using sustainable and updated solutions for future development and restoration projects.	Draft directive policy 3.4.6 may address the comment.
General Comments - Forestry		
	Informed consent from SN Forestry Specialist for all requirements mentioned below: - Engaging with Squamish Nation for all cut block permits. - Engaging with Squamish Nation for all trees to be felled. - Engaging with Squamish Nation for all matters concerning Old Growth/Second Growth. - Being mindful of cutting Cedar trees and returning them back to the Nation if they are felled. - Refer to Squamish Nation Culturally Significant Vegetation list for all native plantation	The Islands Trust does not have jurisdiction over forestry related activities or tree cutting on private lands, with the exception of development permit areas. The comments have been provided to Islands Trust Conservancy staff for consideration in their processes.

	- Engaging with SN for all above and other Forestry related concerns.	
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Tla'amin Nation	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Text of October 8, 2020 letter	
Thank you for the opportunity to review and provide feedback on the Islands Trust Policy Statement. We understand that this document is several decades old and has undergone numerous amendments over the years. We appreciate that the language in the proposed update serves as an improvement in recognizing the importance of First Nations in the Trust Area, including a commitment to the principles of UNDRIP. We believe that the document could go further to involve First Nation governments in the decision-making process, starting with a reference to First Nations in the object statement. Several commitments, directives, and recommendations in the policy sections could include explicit reference to working with First Nations to improve the decision-making process. This would serve to enhance cooperative decision-making in protecting natural and cultural sites, achieving First Nation access to resources, and improving consultation on planned developments. The Tla'amin Nation would like to suggest exploring a Protocol Agreement, or a similar type of document, to help guide the future relationship between the Islands Trust and the Nation. This would be a formal agreement that outlines the procedures for identifying and avoiding archaeological and culturally important sites, works in managing the continued use of resources (as defined in our Treaty), establishes a set schedule of reviews (i.e., annual reviews on planned developments), and proactively consults on development decisions. We look forward to continuing this discussion and building our relationship going forward. Thank you for sharing the opportunity to comment on this version of the Policy Statement and being willing to work	Draft guiding principle 2.2.2 states that Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). A number of draft directive and advisory policies elsewhere in the document, including 3.1.1 , 3,1.2 and 3.2.1 through 3.2.8 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies. Staff do not believe that this request for a protocol agreement was ever responded to. Staff note that there is a need for closer working relationship with staff of Indigenous Governing Bodies, and for protocol agreements. Staff will be reaching out to see if there is still interest in an agreement.

Tla'amin Nation	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
with us for future benefit.	

Tsawout First Nation		
Text from September 2023 version	Tsawout First Nation's comment	Islands Trust Staff Recommendation
Part 1: The Islands Trust Act – 1.4 – Purpose and Structure of the Policy Statement		
Directive Policies (as listed in Part 3 of the Policy Statement) are policies that local trust committees and island municipalities must address in their work on local regulatory bylaws and official community plans. These are general policies that are deemed integral to carrying out the Islands Trust Object, but which are general enough that they can be appropriately adapted to local circumstances. Where a directive policy starts with “shall strive to...”, the local body should make best efforts to implement the policy.	“[Shall strive to]” Passive language, can this be better enforced?	“Strive to” has largely been eliminated from the draft Policy Statement. Where it remains, it is used in policy areas where not solely within the jurisdiction of the Islands Trust or, while within its jurisdiction, the authority is limited/constrained.
PART 2: Guiding Principles – 2.1 – General Guiding Principles		
In its efforts to carry out the Islands Trust Object, Trust Council commits to the following set of shared principles and priorities to guide daily planning and decision making by all bodies across the Islands Trust Area: Trust Council commits to be guided by the following principles in its efforts to advance the Islands Trust Object:	Comment 1: Change ‘guide’ daily planning to ‘inform’. Comment 2: Change ‘being guided’ to ‘being informed’.	As the principles are guiding principles, staff advise that guiding is an appropriate verb.
PART 2: Guiding Principles – 2.1.1 – Acknowledge and Respect Indigenous Rights		

Tsawout First Nation		
Text from September 2023 version	Tsawout First Nation's comment	Islands Trust Staff Recommendation
To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples in decision making, and to work together with Indigenous governing bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species	Add a piece regarding reconciliation. How will the trust look to reconcile past, present and future grievances with the nations whose land they govern. This imbues respecting rights through action.	To address comments from Tsawout First Nation and other Indigenous Governing Bodies draft section 1.3 - "Indigenous Inherent Rights Acknowledgement" was added to the draft document. A number of draft directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.8 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with First Nations.
Take Guidance From the Precautionary Principle To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there may be uncertainty over the threats of serious or irreversible damage from development.	Change "Take Guidance From" and "To be guided by" to "Implement."	"Take Guidance From" more accurately reflects how Trust bodies make decisions.
Account for Cumulative Effects To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats.	Delete "Strive to"	"Strive to" has largely be eliminated from the draft policy statement. Where it remains it is used in policy areas where not solely within the jurisdiction of the Islands Trust or, while within its jurisdiction, the authority is limited/constrained. Not all cumulative effects may be known, or data may not be available – so strive simply means that the LTC and island municipalities will do the best they can in this area. We carefully considered the wording to make this policy flexible.

PART 2: Guiding Principles – 2.3 – Reconciliation Principles		
Trust Council’s Reconciliation Principles	Include Guidance from the Indigenous peoples whose land they govern	A draft reconciliation principle 2.2.4 has been added as follows: Guidance from Indigenous Governing Bodies <i>Be informed by guidance from Indigenous Governing Bodies and Indigenous Knowledge Holders.</i>
PART 3: Goals and Directive Policies – 3.5.17 – Setbacks from the Sea		
Consider the current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea	Suggested change: ‘Consider’ to ‘incorporate’.	Draft directive policy 3.5.20 has been revised as follows: Setbacks from the Sea <i>Incorporate current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by the federal and provincial governments</i>
PART 3: Goals and Directive Policies – 3.5.18 – Soft Shoreline Protections		
Consider and foster soft shoreline approaches first such as those identified by the “GreenShores” program to set requirements for shoreline preservation.	Suggested change: ‘Consider’ to ‘incorporate’.	Islands Trust Council has signaled that it is not prepared to prohibit shoreline hardening, and nor is it prepared to mandate Green Shores approaches to managing shoreline erosion. Draft directive policy 3.5.21 has been revised as follows: Soft Shoreline Protections <i>Prioritize and foster soft shoreline approaches, such as those identified by the “Green Shores” program, to set requirements for shoreline preservation, and to mitigate erosion of</i>

		<i>shoreline and foreshore cultural heritage sites.</i>
PART 3: Goals and Directive Policies – 3.5.21 – Private Docks		
Limit or prohibit new private docks in areas identified as culturally significant by Indigenous governing bodies and Indigenous Knowledge Holders, in areas that provide critical habitat for species at risk, and in areas of recreational significance; and consider the cumulative effects of docks	Suggested change: Remove “Limit or.”	Islands Trust Council has signaled that it is not prepared to direct local trust committee and island municipalities to prohibit private docks. Draft directive policy 3.5.25 has been revised as follows: Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>

Tla'amin Nation	
July 2021 version	Comments from Islands Trust Staff
Highlights of comments	
Tla'amin Nation suggests that Islands Trust bears in mind the order of importance when being inclusive and representative of indigenous communities in the Trust. It is noted that often First Nations appeared as the last item in multiple lists of consideration. Whether intentional or not this lends the document an air of afterthought when considering First Nations and does not align with the trusts mandate to be guided by UNDRIP.	This may have been satisfactorily addressed by revisions to the draft Policy Statement.
It would be nice to have some live links to some of these documents. The average islander is not well versed in these legalities	Hyperlinks have been added to referenced documents in draft Reconciliation Principles 2.2.1 – 2.2.3.
Can the document show a map with the SOI and Treaty consultation Areas in the document as well?	Staff are working on a map. However, given the number of Indigenous Governing Bodies with territorial interests that overlap/intersect with the Islands Trust Area, and the buy-in required from Indigenous Governing Bodies, such a map may not be ready for inclusion in the new Policy Statement.
Roles and responsibilities section: Tla'amin Nation plays almost no role in Trust governance or decisions. This section should say the Islands Trust is striving to work with First Nations to allow Indigenous Nations to play an integral role in governance and cooperative decision making; For example, a role on your board	This section was removed from the draft document. To address comments from Tla'amin Nation, and other Indigenous Governing Bodies draft section 1.3 – “Indigenous Inherent Rights Acknowledgement” was added to the draft document. It “respectfully acknowledges Indigenous rights to self-governance and the expressed interest of Indigenous Governing Bodies in working toward co-governance of the Islands Trust Area.”
Roles and responsibilities section: What Responsibilities do visitors and land owners have to be stewards or to make sure they are conforming with IT policy?	This section was removed from the draft new Policy Statement.
Precautionary principle definition: There are better definitions. This is close to the Rio Declaration but I think their order of wording is better. "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for	The definition has already been updated in response to this comment from Tla'amin Nation.

Tla'amin Nation	
July 2021 version	Comments from Islands Trust Staff
postponing cost-effective measures to prevent environmental degradation." - <i>Principle 15 of the Rio Declaration on Environment and Development in 1992.</i> “When there is substantial, credible evidence of danger to human or environmental health, protective action should be taken despite continuing scientific uncertainty.” - <i>Joe Schwarcz Phd (McGill University)</i>	
Re Guiding Principle re Prioritize Environmental and Indigenous Cultural Heritage Protection: We like it! Hope your committed to it.	Document has been redrafted with this feedback in mind.
Re removal of soil from a midden: It's contrary to the Heritage Conservation Act (HCA) It's not legal to take fill from a midden regardless of whether it is identified as culturally significant and regardless of whether the site is a registered or unregistered site archaeological site.	Document has been redrafted with this feedback in mind.

Tseil-Waututh Nation	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Highlights of comments	
Introduction: Include the terms 'ancestral and unceded territories'.	Acknowledgement on page 1 now says “The Islands Trust Area is located within Coast Salish Territory, in the treaty lands and territories of . . .”. This phrasing captures that there are Indigenous Governing Bodies both with, and without, treaties in the Trust Area.
Challenge and Present context section: Would like to see impacts of climate change mentioned	The referenced section has been deleted from the current draft.
Role of First Nations section: Consider that consultation with First Nations requires provision of capacity funding and adequate timelines and early engagement. Consultation provides an opportunity for nations to flag concerns and identify potential impacts to rights, offer mitigation measures to lessen impacts, protect cultural heritage, enhance cultural recognition, and exercise self-determination and decision making according to their own laws. As such, the 'Role of First Nations' may need to be expanded and further explained. TWN recommends using the term consultation rather than engagement.	The referenced section has been deleted from the current draft.
Guiding principles: Sharing traditional and local knowledge is a very sensitive process and access to this information is privileged. Each nation will have their own protocols around knowledge sharing. Nations who do choose to share cultural knowledge are expected to be fairly compensated for that information (through capacity funding, for example). TWN	This concern is addressed in draft Cooperation Principle 2.3.6 which says: Provide Public Education Opportunities

Tseil-Waututh Nation	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
recommends acknowledging this sensitivity in the statement.	<i>To provide education opportunities to residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the Trust Area and its unique amenities and environment, while respecting the confidentiality interests of Indigenous Knowledge Holders and Indigenous Governing Bodies.</i> <i>It is also addressed in New draft advisory policy 3.1.4 which says:</i> Respect Indigenous Protocols for Information and Data Provided <i>Respect Indigenous Governing Bodies' and Indigenous Knowledge Holders' protocols about how their data and information should be collected, protected, used and shared.</i>
Definition of sustainable: include cultural needs	Staff will advise Tseil-Waututh Nation that this change has not been made and enquire further about this request.
TWN adheres to a policy of net environmental gain for all projects occurring in the Consultation Area. Where appropriate, TWN recommends editing policies to include 'preserves and enhances'.	Draft Goal 3 ecosystem protection policies say "Identify and prioritize the preservation, protection and restoration of . . ."
TWN considers the current ecological conditions of much of the territory to be at a loss compared to the pre-contact conditions. TWN uses pre-contact conditions as a baseline when determining the potential recovery of an ecosystem. TWN recommends identifying that ecological potential for restoration is a pre-contact baseline.	The draft Policy Statement does not articulate a baseline against which to assess ecosystem health.
Directive policy re aquaculture: recommend adding "areas of cultural significance" to list of place aquaculture should be directed away from	Draft directive policy 3.5.19 has been revised to address this comment as follows: Aquaculture Tenures <i>Direct commercial aquaculture tenures to appropriate locations that will not adversely impact areas identified as culturally significant by Indigenous Governing Bodies,</i>

Tseil-Waututh Nation	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
	<i>that provide critical habitat for species at risk, are of recreational significance or established or designated upland land uses, anchorages or moorages.</i>
Where policies state “should be compatible with preservation and protection of the environment, natural amenities, resources and community character.” add cultural heritage to the list.	This language has been replaced in several policies by “. . . that may adversely impact the preservation and protection of the Trust Area and its unique amenities and environment.” Unique amenities is interpreted to be inclusive of cultural heritage.
Where policies list types of places to be protected include places of spiritual importance.	This comment is addressed in draft new advisory policy 3.2.7 which says: Other Culturally Significant Areas for Indigenous Peoples <i>Through engagement with Indigenous Governing Bodies, identify and prioritize protection of areas of importance for Indigenous cultural and spiritual practices.</i>

Quw’utsun Nation members	
Quw’utsun Nation (key themes from notes from January 2024 meeting about draft amendments)	Comments from Islands Trust Staff
Up to draft section 1.3	
- There is an opportunity to flag that the Province is aligning its laws, and signal the context that this is one of the laws that aligns with UNDRIP – opportunity to signal that the Islands Trust Act should be modernized. - Some of the draft language suggest that there didn’t have to used to be conservation effort, because indigenous communities, the way they cared for land, it happened naturally. So this way of framing run into residents now wanting to keep the islands a certain way.	Regarding comments expressing concern about the approach to drafting a new Policy Statement, staff advised that First Nations were welcome to write to Trust Council at any time to request a new approach. To address comments from Cowichan Tribes and other Quw'utsun Nation members, and other Indigenous Governing Bodies draft section 1.3 - “Indigenous Inherent

Quw'utsun Nation members	
Quw'utsun Nation (key themes from notes from January 2024 meeting about draft amendments)	Comments from Islands Trust Staff
• Not sure if mandate is being executed well with the amount the development. The Nation has members, with traditional foods, that can't care for them in the way they have. • The phase 'where development is deemed necessary' is problematic– a lot of their Nation's community members would not deem development on the islands necessary (e.g. estuary and huge development – not a good mix) • The Islands Trust Act will be subject to UNDRIP and will then have to align with Constitution. Easy for settlers to think they have rights; but this very different from rights and title that has existed since forever • The whole concept of preserve and protect is not accurate. • 'Who' is deeming development necessary? How is Islands Trust working with Quw'utsun Nation? There is very little actual working together – this comes from new understanding. • Substance is important – infringement on rights and title can't be mitigated or accommodated for. • Regarding proposed list of major islands in description of Trust Area: What does it mean to when an island is called a 'major island? Not listing Lyackson Island as a major island erases the important of Lyackson in the Islands Trust Area – that erasure is unacceptable. • Considering the continued progression of this project is a concession of the First Nations in recognition of the important of getting the work done. But this is not enough until Islands Trust realizes the importance protecting. This project is a first step but this is not the only step and Islands Trust should only take this step with the promise offurther action Indigenous rights and to move to co-governance.	Rights Acknowledgement” was added to the draft document. Several draft directive and advisory policies elsewhere in the document, including 3.1.1, 3,1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Draft guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).”

Quw'utsun Nation members	
Quw'utsun Nation (key themes from notes from January 2024 meeting about draft amendments)	Comments from Islands Trust Staff
• The whole method of how these documents are approached needs to be change. It will come down to the Islands Trust's sense of social responsibility. • Generally, First Nations need more representation on the Islands Trust. • Islands Trust wasn't really involved in protecting Grace Islet. It was the nations standing up to Province at Walker Hook, with support from some islanders. • References to population numbers should include Indigenous People who were displaced from the islands. • RE: proposed unique amenities definition that included explanation that term amenity is derived from the Latin term amoenitās, signifying “pleasantness, delightfulness, charm: • The idea of being reduced down to pleasantness, delightfulness, and charm feels like wearing First Nations culture as an accessory • The reductive nature of the proposed definition is infantilizing, absurd, pastoral, odd. • It feels tokenizing and red-washing • Feels like a Terra Nullius type of term – as if the islands are not cultivated landscapes. • Just completely the wrong definition for ‘unique amenities’ - should be more nature-based amenities.	

W̱SÁNEĆ Leadership Council Society (for Tsartlip, Tsartlip and Tsawout First Nations)	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Highlights of comments	
Introduction/Acknowledgement: should highlight the fact that the lands in the gulf islands were never sold under the Douglas Treaties or any other agreement.	Acknowledgement has been crafted to be general and applicable to the whole Islands Trust Area.
Description of Trust Area should include that these islands/species were managed and intimately known by the Coast Salish Indigenous people and were/are essential factors to the health and economy of the W̱SÁNEĆ.	The section has been removed from the draft Policy Statement.
Description of Trust Area: It would be great to insert the story of TELETACES here.	The section has been removed from the draft Policy Statement.
To date there have been no Policy Statement amendments that incorporate the interest of local First Nations. With the Provincial adoption of UNDRIPA and the recognition of the importance of First Nations interest in the Islands Trust area another challenge is reconcile these interests with the direction of Islands Trust Policy.	To address comments from WLC, and Indigenous Governing Bodies, Section 1.3 – “Indigenous Inherent Rights Acknowledgement” was added to the draft document. Several directive and advisory policies elsewhere in the document, including 3.1.1, 3.1.2 and 3.2.1 through 3.2.9 speak to how Islands Trust Council expects local trust committees and island municipalities to engage with Indigenous Governing Bodies. Guiding principle 2.2.2 states that “Trust Council will, to the extent that they engage its mandate to preserve and protect the Trust Area: be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
Present context section: Additional context is the need to solve the environmental issues in a way that further reconciliation with First Nations, as the original and proper caretakers of the land	The section has been removed from the draft Policy Statement.
Need for cumulative impact studies, the need to determine the carrying capacity of the Salish sea, the need for responsible informed decision making. Incorporation of First Nations values.	Guiding principle 2.1.6 speaks to striving to account for cumulative effects.
Priorities and management strategies should be established in collaboration with First Nations.	A number of directive and advisory policies in the document, including 3.1.1 , 3.1.2 and 3.2.1 through 3.2.8

WSÁNEĆ Leadership Council Society (for Tsartlip, Tsartlip and Tsawout First Nations)	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
	speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies.
Highlight need to preserve environment to protect treaty rights and ensure they can be exercised into the future	In accordance with this recommendation, the draft opening acknowledgement has been revised to add the following clause: “Islands Trust Council acknowledges that a healthy environment is essential for Indigenous People to be able to exercise their inherent and treaty rights.”
Roles and responsibilities section: How, specifically, will cooperative decision-making be pursued?	A number of draft directive and advisory policies in the document, including 3.1.1 , 3.1.2 and 3.2.1 through 3.2.8 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies.
Add more items of interest to First Nations: • Protection of cultural heritage • Educational materials related to Indigenous history, rights, and culture • Place names and Signage • Housing • Reconciliation • Environmental Health/Remediation • Development Permitting • Economic opportunities/Land Opportunities	The topics of educational materials, and placenames and signage, are best dealt with in other ways by Islands Trust. WLC has asked for a protocol agreement and it is expected these topics will addressed through that agreement.
Throughout the document, I did not see mention of exploring place name changes, use of art in developments (WSANEC art), installing signage related to First Nations history/culture, education re: First Nations for residents, or specific targeted reconciliation policies.	
Islands Trust Object and its Meaning section introduction: should state the Islands Trust seeks reconciliation with First Nations	The section has been removed from the draft Policy Statement.

WSÁNEĆ Leadership Council Society (for Tsartlip, Tsartlip and Tsawout First Nations)	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Islands Trust Object and its Meaning “to preserve and protect” section: include mention of First Nations history, cultural and archaeology	The section has been removed from the draft Policy Statement.
Islands Trust Object and its Meaning “for the benefit of” section: Mention there is a legal obligation to preserve the land and water to enable First Nations to be able to exercise their aboriginal and treaty rights.	The section has been removed from the draft Policy Statement.
Guiding principle: “When making decisions and exercising judgment, Trust Council will place priority on preserving and protecting the integrity of the environment, cultural heritage, and amenities in the Trust Area.” Include concept of restoration	Draft guiding Principle 2.1.2 has been revised as follows: Prioritize Environmental and Indigenous Cultural Heritage Protection <i>To place priority on preserving, protecting and restoring the environment, and preserving, protecting, and supporting restoration of Indigenous cultural heritage in all decision making</i>
Preamble to Foster preservation and protection of Trust Area ecosystems goal: include active remediation as well.	The section referenced in this comment has been removed from the draft Policy Statement. References to restoration have been included elsewhere in the draft Policy Statement.
Preamble re Foster preservation and protection of Trust Area ecosystems re all sharing management responsibilities for ecosystems: When making decisions and exercising judgment, Trust Council will place priority on preserving and protecting the integrity of the environment, cultural heritage, and amenities in the Trust Area.	Draft directive policies 3.2.4, 3.2.5, 3.2.7 and 3.2.8 have been revised to change “Identify and protect” to “Identify and prioritize protection of”
Re ecosystem protection policies: Include specific WSANEC places: harvesting places, places where specific medicines grow, cultural places, etc.	These topics have been addressed in the draft directive and advisory policies of Goal 2.
RE creating networks of protected areas. Must be done in collaboration with First Nations - The creation of protected areas, despite being well meaning, has been used to dispossess indigenous peoples.	Document has been redrafted with this feedback in mind.
Islands Trust should consider cumulative impact studies to support long term planning and decision making	Draft guiding principle 2.1.6 calls for Trust Council to strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and Islands Trust Area species and their habitats.

WSÁNEĆ Leadership Council Society (for Tsartlip, Tsartlip and Tsawout First Nations)	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
Re policies re protection of unfragmented forest ecosystems: What about the reconnection of fragmented forest ecosystems	Draft directive policy 3.3.1 addresses protected area networks Draft advisory policy 3.3.10 speaks to Indigenous led ecosystem management which could support reconnection of fragmented forest ecosystems.
Preamble to stewardship of resources section: mention First Nations rights (Douglas Treaty rights)	The section has been removed from the draft Policy Statement.
Agricultural practices have removed WSANEC hunting territory, the original traditional activity in the region	The section has been removed from the draft Policy Statement.
Agricultural activities should be compatible with indigenous food harvesting	Policy 3.5.11 was revised to mention consideration of downstream impacts – this was added based on input by WLC.
Each directive policy should say “in Include collaboration with First Nations”	A number of draft directive and advisory policies elsewhere in the document, including 3.1.1 , 3.1.2 and 3.2.1 through 3.2.8 speak to how Islands Trust Council expects its local trust committees and island municipalities to engage with Indigenous Governing Bodies.
There needs to be directive policies re wildlife and vegetation as development by Islands Trust may impact habitats.	The section has been removed from the draft Policy Statement. See draft Goal 3, ecosystem integrity section.
All docks reduce the amount of harvestable foreshore for shellfish	Document has been redrafted with this feedback in mind.
Development should be directed to sites away from sites important to First Nations	Document has been redrafted with this feedback in mind. This concept is addressed throughout the draft document.
Consider protections for clam gardens	Clam gardens are specifically addressed in draft directive policies 3.2.1 and 3.2.2 and in draft advisory policies 3.2.4 and 3.2.5.

WSÁNEĆ Leadership Council Society (for Tsartlip, Tsartlip and Tsawout First Nations)	
2020 feedback (comments on an amended version of 2003 Policy Statement)	Comments from Islands Trust Staff
• Re policies regarding heritage protection: See recommendations in Cordova Bay Local Area Plan: undertake updated archaeological potential mapping and ground-truthing with archaeologists and WSÁNEĆ knowledge holders to better understand and protect the footprint of WSÁNEĆ ancestral landscapes. • exercise caution—in collaboration with WSÁNEĆ knowledge holders and decision makers and in accordance with the Protocol Agreement between the District of Saanich and the WSÁNEĆ Leadership Council—with respect to redevelopment and ground-altering activities that have potential to impact documented and undocumented WSÁNEĆ ancestral and cultural sites. This is of heightened concern in the coastal and village sub-areas.	Generally, the theme relevant to land use planning have been captured. Staff will work with WLC staff on a protocol agreement to address the other topics.
First Nations have information/databases to inform Islands Trust land use planning.	Staff look forward to working more closely with Indigenous Governing Bodies. Draft new advisory policy 3.1.4 is as follows: Respect Indigenous Protocols for Information and Data Provided <i>Respect Indigenous Governing Bodies' and Indigenous Knowledge Holders' protocols about how their data and information should be collected, protected, used and shared</i>



Policy Statement Amendment Project – What We Heard in Phase 3

What we heard in Phase 3 of public engagement and what we have done in response in the draft new Policy Statement (June 1, 2025)

www.islandstrust.bc.ca/programs/islands-2050

The purpose of this What We Heard document is to assist in capturing how public input from Phase 3 of public engagement has been addressed in the revised draft Policy Statement. It identifies the key themes from Phase 3 (as identified in [ISL's Engagement Summary Report](#)) and provides an outline of what has been done in response in the revised draft dated June 1, 2025. (NOTE: This document will be updated to match the first reading version prior to being posted to the website as a standalone document.)

Policy Statement Amendment Project has had three phases of public¹ engagement, which have included both online and in-person activities.

- Phase 1 (2019) - to gather community values, concerns related to climate change, and opportunities to preserve and protect the Islands Trust Area
- Phase 2 (2021) - to gather input on draft policy directions related to climate change and affordable housing
- Phase 3 (2022) - to gather input on the first draft of the new Policy Statement

In June and September 2022, after receiving engagement feedback from Indigenous Governing Bodies, referral agencies, and the public during Phase 3, the outgoing 2018-2022 Trust Council passed 32 resolutions requesting staff to amend the Policy Statement Bylaw No. 183, for review by the new 2022-2026 Trust Council and its committees. Through 2023 and early 2024, staff revised the draft as directed, while engaging with Indigenous Governing Bodies and some provincial agencies. Trust Council and its committees then worked on further refining the draft, taking into account the input received to date.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
General	A need for a balance between environmental protection and sustaining residents' valued communities and way of life.	The revised draft addresses both environmental protection and the fostering of sustainable, inclusive, and resilient communities.
	Commit to making decisions based on objective, scientific data.	Trust Council has determined that its decisions should be guided by a range of inputs, including scientific data, as stated in the following draft guiding principle: <i>2.1.7 Foster Informed and Balanced Decision Making</i>

¹ Public input is one of many streams of input informing the Policy Statement Amendment Project, along with input from interested and affected parties, First Nations and Indigenous community members, referral agencies, Trust Council and its committees, and staff.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<i>To be informed by a broad range of sources in its decision-making processes, including Indigenous Knowledge, institutional knowledge, local community knowledge, and science.</i>
	General appreciation for addressing climate change.	The following draft directive policies relate to addressing climate change: 3.4.5 Climate Change Mitigation and Adaptation <i>Implement planning and land use management strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.</i> 3.4.6 Hazardous Areas <i>Identify areas at elevated risk of natural and climate change-related hazards and restrict development within these areas including, but not limited to, areas subject to flooding, sea-level rise, erosion, slope instability and wildfire.</i> 3.5.20 Setbacks from the Sea <i>Incorporate current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by the federal and provincial governments.</i> The following advisory policies also relate to this issue: 3.4.19 Natural Building Materials and Techniques <i>Encourage construction of buildings and structures using local natural building materials and techniques, and minimize barriers to their use.</i> 3.4.23 Transportation Network Vulnerabilities <i>Cooperate with relevant agencies to identify parts of the local transportation network at risk of damage or deterioration and participate in planning to address mitigation or infrastructure relocation where necessary.</i> While the policies above explicitly reference climate change, the document's focus on maintaining functioning natural landscapes and systems are, in many ways, policies about climate change adaptation and mitigation.
	General agreement that development should be carefully managed to protect from further	The revised draft has many policies relevant to this feedback, including ones directing the management of the rate and scale of growth, such as the following draft directive policies:

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	impacts.	3.4.1 Sustainable Development <i>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.</i> 3.4.2 Growth Management <i>Manage community growth and its associated impacts by directing residential, commercial and industrial development to suitable locations to prevent sprawl, minimize fragmentation of forest lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.</i>
	Participants voiced concerns about the precautionary principle, noting that it is open to broad interpretation, could be contradictory to scientific evidence, and could be manipulated based on emotions and personal bias. Some see the precautionary principle as a means to stop potential progress.	The revised draft Policy Statement contains the following guiding principle about the Precautionary Principle: 2.1.5 Take Guidance from the Precautionary Principle <i>To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there may be uncertainty over the threats of serious or irreversible damage from development.</i> In addition, the following glossary definition has been added to ensure there is a common understanding of the precautionary principle: <i>"Principle 15 of the Rio Declaration, known as the precautionary principle, states: "In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation." Four central components of the precautionary principle include: taking preventive action in the face of uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making."</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
Advocacy	There was mixed support or lack of support for advocacy in a variety of areas (e.g. removal of abandoned and derelict vessels, oil spill prevention and response, and new tree-cutting authority for local trust committees).	Advocacy policies that guide Trust Council in its work to make recommendations or requests to other levels of government have been removed from the revised draft Policy Statement (including a request for authority to regulate tree-cutting). This does not prevent Trust Council from advocating on topics it feels are important. A draft Trust Council cooperation principle is relevant to this feedback: 2.3.4 Work Towards Strategic Inter-Agency Coordination <i>To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.</i> The revised draft Policy Statement contains “Advisory Policies”, in which Trust Council highlights issues that it would like local trust committees and island municipalities to consider or act on when opportunities arise, but which it cannot/does not wish to compel via a directive policy.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
Ecosystem preservation and protection	There was general support for the following concepts: • monitoring the effects of climate change and other influences on the ecosystem • using nature-based solutions • limiting development in areas where there is inadequate freshwater • valuing agriculture and forestry through small-scale harvesting practices • banning industrial-scale clear-cutting and logging of old growth trees • keeping marine dependent land uses away from eel grass and kelp forests • advocating to other levels of government to prohibit ocean dumping and commercial freighter anchorage sites	The revised draft contains policies that are relevant to this feedback: 3.4.5 Climate Change Mitigation and Adaptation <i>Implement planning and land use management strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.</i> 3.5.1 Freshwater Sustainability <i>Ensure that 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.</i> 3.5.8 Forest Lands for Sustainable Management <i>Maintain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the Trust Area and its unique amenities and environment.</i> 3.5.15 Sustainable Agriculture <i>Preserve, protect, and encourage sustainable farming and the sustainability of farming.</i> 3.3.6 Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i> 2.3.4 Work Towards Strategic Inter-Agency Coordination <i>To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.</i>
Freshwater stewardship	Many participants indicated they feel that water is finite and want to protect it. There was strong support for Islands Trust to advocate for rainwater as a supplemental water source; and as a primary source. Participants shared an overall support for restricting development in areas where freshwater is limited, while others did not want it	The following directive policies within the revised draft are relevant to this feedback: 3.5.1 Freshwater Sustainability <i>Ensure that 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.</i> 3.5.2 Freshwater Demand and Supply Projections <i>Ensure that existing, anticipated, and seasonal water demand and water availability are</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	to be an excuse to limit development.	<i>considered.</i> 3.5.3 Freshwater Self-Sufficiency <i>Ensure that islands are self-sufficient in their supply of freshwater.</i> 3.5.4 Saltwater Intrusion <i>Identify areas at elevated risk of saltwater intrusion and restrict development serviced by groundwater within these areas.</i>
	Participants strongly disagreed with the proposed prohibition of desalination.	The previously proposed directive policy on desalination was removed.
Coastal and marine stewardship	Overall support from participants that Islands Trust prioritize the protection of the coastal and marine environment.	The following directive policy within the revised draft is relevant to this feedback: 3.3.6 Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i>
	Participants were evenly divided between those that support and do not support prohibiting hard seawalls. Participants also noted the need for flexibility to decide what is best in each case.	The previously proposed policy prohibiting seawalls and directing inclusion of policies that foster soft shoreline protection has been redrafted: 3.5.21 Soft Shoreline Protections <i>Prioritize and foster soft shoreline approaches, such as those identified by the “Green Shores” program, to set requirements for shoreline preservation and to mitigate erosion of shoreline and foreshore cultural heritage sites.</i>
	Participants strongly opposed prohibiting private docks. Some suggested that a blanket policy was not appropriate and that the need for a dock should be assessed on a case-by-case basis.	The previously proposed policy prohibiting new private docks except where properties are boat-access only has been redrafted: 3.5.25 Marine Docks <i>Consider the cumulative effects of docks, and limit or prohibit new private docks in areas identified as culturally significant by Indigenous Governing Bodies and Indigenous Knowledge Holders, in areas that provide critical habitat for species at risk, and in areas of recreational significance.</i>
	Participants noted concern over degradation of the foreshore and stated they would like to	The revised draft includes a revised directive policies relevant to this feedback:

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	protect it against continued erosion while others are concerned for eelgrass meadows and kelp forests and want to protect them against harm from dumping and anchoring.	3.3.6 Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i> 3.5.18 Soil and Fill from Middens and Foreshore Areas of Cultural Significance <i>Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.</i> 3.5.21 Soft Shoreline Protections <i>Prioritize and foster soft shoreline approaches, such as those identified by the "Green Shores" program, to set requirements for shoreline preservation and to mitigate erosion of shoreline and foreshore cultural heritage sites.</i> The revised draft includes new directive policies relevant to this feedback: 3.5.22 Vessel Moorage <i>Prohibit the moorage of vessels in sensitive marine areas, including, but not limited to, eelgrass meadows, kelp forests, forage fish spawning areas, estuaries and mud flats.</i> 5.5.26 Marine Structures <i>Limit or prohibit the construction or installation of breakwaters, groynes, rock weirs and jetties in marine areas that are not zoned for group wharfage, marine commercial or industrial use, or ferry terminals.</i>
	Participants supported shoreline setbacks and keeping marine dependent land uses away from these sensitive areas.	The revised draft includes revised directive policies relevant to this feedback: 3.5.19 Aquaculture Tenures <i>Direct commercial aquaculture tenures to appropriate locations that will not adversely impact areas identified as culturally significant by Indigenous Governing Bodies, that provide critical habitat for species at risk, are of recreational significance or established or designated upland land uses, anchorages or moorages.</i> 3.5.20 Setbacks from the Sea <i>Incorporate current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<i>recommended by federal and provincial governments.</i>
Forest Stewardship	Participants strongly disagreed that Islands Trust should advocate to the Provincial government to regulate general tree cutting or forest management by individual property owners.	As noted above, advocacy policies have been removed from the Policy Statement draft (including advocacy for authority to regulate tree-cutting).
	There was strong support advocacy for the prohibition of clear-cutting and logging of old-growth. Some participants commented that management of forestry is needed on public lands and others shared that removing trees promotes healthy forests.	As noted above, advocacy policies have been removed from the revised draft (including advocacy for legislation to prohibit clear-cutting and logging of old-growth in the Trust Area); The revised draft includes revised directive policies relevant to this feedback: 3.3.3 Forest Ecosystems <i>Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forests, with a particular focus on the maintenance and restoration of their ecological integrity.</i> 3.5.8 Forest Lands for Sustainable Management <i>Maintain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the Trust Area and its unique amenities and environment.</i>
	Some participants also noted that the Policy Statement should further address measures needed to mitigate risk from forest fires.	The revised draft includes two directive policies relevant to this feedback: 3.4.6 Hazardous Areas <i>Identify areas at elevated risk of natural and climate change-related hazards and restrict development within these areas including, but not limited to, areas subject to flooding, sea-level rise, erosion, slope instability, and wildfire.</i> 3.5.10 Forest Lands and Wildfire Risk Management <i>Identify land use strategies that mitigate wildfire risk and that are appropriate to the unique biogeoclimatic zones and settlement patterns of each local planning area.</i>
	Participants also commented that education and tree planting programs are needed for the sustainability of the forests.	A draft cooperation principle within the revised draft is relevant to this feedback: 2.3.6 Provide Public Education Opportunities <i>To provide education opportunities to residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the region's unique</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<i>amenities and environment, while respecting the confidentiality interests of Indigenous Knowledge Holders and Indigenous Governing Bodies.</i>
Agricultural stewardship	There was concern that agriculture had been removed as a “valued activity” in the draft Policy Statement.	The revised draft includes acknowledgement of the value of sustainable agriculture by including an advisory policy to preserve, protect, and encourage it:
	Many participants indicated they support sustainable and regenerative farming practices, and that education is needed to support this.	3.5.15 Sustainable Agriculture <i>Preserve, protect, and encourage sustainable farming and sustainability of farming.</i> Islands Trust is limited in its ability to regulate <i>how</i> farming is done, particularly on land that is in the Agricultural Land Reserve. It can, however, protect agricultural land, as in the following draft revised directive policy: 3.5.11 Protection of Agricultural Lands <i>Identify and protect agricultural lands for current and future use consistent with the Agricultural Land Commission Act and its regulations for agricultural land within the Agricultural Land Reserve while considering downstream impacts, wildlife habitat, and adjacent properties.</i>
	There was concern over the use of the term “small-scale” with respect to agriculture.	In the revised draft, the term “small-scale” is no longer used.
	Seventy-two (72%) of online survey respondents agreed or strongly agreed that agricultural impacts (use of chemicals and impacts on the environment) should be considered when preserving areas for agriculture.	The revised draft emphasizes the protection of agricultural lands and the need to consider downstream impacts in a draft directive policy:
	Participants also noted they are worried about food shortages in the future and would like to protect farming to ensure access to food in the future.	3.5.11 Protection of Agricultural Lands <i>Identify and protect agricultural lands for current and future use consistent with the Agricultural Land Commission Act and its regulations for agricultural land within the Agricultural Land Reserve while considering downstream impacts, wildlife habitat, and adjacent properties.</i> The revised draft contains the following draft advisory policy: 3.5.16 Food Security and Food Sovereignty <i>Support initiatives that advance food security and Indigenous food sovereignty.</i>
	There were some participants across all engagement activities said they would like to both protect and encourage farming, noting its local	The revised draft includes a draft directive policy that would require efforts to address the economic viability of farms in a manner consistent with the preserve and protect mandate:

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	economic benefit and its contribution to food security and self-sustainability of the islands.	3.5.14 Economic Viability of Farms <i>Consider land uses and activities that support the economic viability of farms without compromising the agricultural capability of agricultural land or adversely impacting the area's unique amenities and environment.</i>
Sustainable and resilient communities / housing	Throughout all engagement activities, most participants agreed there is a housing shortage in the Islands Trust Area, and that this is one of their greatest concerns and priorities.	The revised draft contains a suite of revised and new draft directive policies regarding housing: 3.4.11 Suitable Locations for Additional Housing <i>Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable housing.</i> 3.4.12 Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i> 3.4.13 Clustered Small Dwelling Units <i>Support alternatives to conventional single-detached dwellings by establishing policies to permit clusters of small dwelling units in suitable areas.</i> 3.4.14 Floor Area and Lot Coverage Limits <i>Determine appropriate floor area and lot coverage limits for residential development to minimize negative environmental impacts, including on land used for agricultural purposes.</i> 3.4.15 Affordable and Special Needs Housing <i>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.</i> 3.4.16 Short-Term Rentals <i>Identify and assess the impacts of short-term rental of dwellings on the availability of safe, secure and affordable housing and, where necessary, regulate and limit the number of short-term rentals accordingly.</i> The revised draft also contains two draft advisory policies related to housing: 3.4.17 Housing for Indigenous People <i>Through engagement with Indigenous Governing Bodies, support housing opportunities for</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<i>Indigenous people in the Islands Trust Area.</i> 3.4.18 Multi-Unit Residential <i>Implement land use regulations for affordable and special needs housing and other multi-unit residential development that allow for a range of potential configurations on the site to accommodate changing construction conditions, with form and character controlled through development permit areas.</i> Many other draft directive and advisory policies in the revised draft are also relevant to housing as they identify ecosystems/ecosystem features, heritage sites, harvesting areas, and other areas to be prioritized for protection, or for which potential adverse impacts are to be minimized.
	Participants stated there is a need for affordable housing for many sectors of the population including seniors and youth, and that there is a lack of affordable rental housing for those who work on the islands, particularly in the tourism or service sectors. Some participants shared they would like to remain on the islands as they age but are concerned about the lack of appropriate housing available to them.	The revised draft continues to have draft policies relevant to this feedback, including the following draft directive policies that would support increased housing diversity and affordability: 3.4.11 Suitable Locations for Additional Housing <i>Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable housing.</i> 3.4.12 Housing Diversity <i>Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.</i>
	A slight majority of survey respondents (55%) agreed that the Policy Statement should include an Islands Trust commitment to strategic, multijurisdictional, equitable and integrated approaches to diverse housing needs, and that local official community plans should carefully manage the rate and scale of growth and development in the area.	The revised draft has many revised and new policies relevant to this feedback, including the following draft directive policies directing the management of the rate and scale of growth: 3.4.1 Sustainable Development <i>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.</i>
	Participants supported the proposed policy that new development should be small-scale, low-impact and energy efficient, tying into earlier	3.4.2 Growth Management <i>Manage community growth and its associated impacts by directing residential, commercial and industrial development into suitable locations to prevent sprawl, minimize</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	feedback that rainwater could be used as a primary source of water for new developments.	<i>fragmentation of forest lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.</i> 3.4.3 Impacts of Development <i>Consider the aesthetic, environmental, and social impacts of development.</i>
	While there was some concern expressed about size of homes, a slight majority of respondents (51%) did not support directives to local trust committees and island municipalities on limits of floor area and lot coverages.	The revised draft has a revised directive policy requiring determination of floor area and lot coverage limits but does not prescribe what the limits should be: 3.4.14 Floor Area and Lot Coverage Limits Determine appropriate floor area and lot coverage limits for residential development to minimize negative environmental impacts, including on land used for agricultural purposes.
	Participants generally supported short-term rentals (e.g., for the economy and seasonal workers) but are in agreement with ensuring regulations be put in place (e.g., to prevent impacting availability of long-term rentals).	The revised draft continues to have a draft directive policy about short-term rentals that is relevant to this feedback: 3.4.16 Short-Term Rentals <i>Identify and assess the impacts of short-term rental of dwellings on the availability of safe, secure, and affordable housing and, where necessary, regulate and limit the number of short-term rentals accordingly.</i>
	A majority of survey respondents (58%) supported Islands Trust advocating for appropriately-situated transportation networks for electric vehicles and electric bikes. Some participants did offer a contrary perspective, raising concern about the long-term environmental impact of the disposal of batteries, the large amount of energy that goes into building vehicles, and lack of connectivity or capacity of the electrical grid in some areas.	Advocacy to other agencies has been removed from the revised draft (including advocacy to provincial government agencies to work together with local communities through public consultation processes to evaluate and modify road construction, road system proposals, and active transportation networks). The revised draft has a revised draft directive policy about public and active transportation networks that encourage zero emission transportation that is relevant to this feedback: 3.4.20 Public and Active Transportation Networks <i>Identify and establish appropriately-situated, safe, comfortable, and equitable transportation networks that reduce dependency on private automobile use, encourage zero emission modes of transportation, and support increased use of trail systems, public transportation, and active transportation.</i> The revised draft also has a new directive policy about road systems that is relevant to this feedback:

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		3.4.22 Road Systems <i>Ensure that road location, design, construction, and road systems are compatible with preservation and protection of the Trust Area and its unique amenities and environment.</i> Advocacy to other agencies has been removed from the revised draft (including advocacy to provincial government agencies in support of the electrification of ferries in the Trust Area).
Engagement process	When asked about advocating to BC Ferries for the electrification of their fleet, feedback was more mixed, with some participants indicating this is outside the Islands Trust mandate and is an issue better left to other levels of government. Others indicated that better ferry service is needed and would like to see Islands Trust work with BC Ferries to ensure safe and efficient travel. A common theme across all engagement activities and in response to the online survey questions was a frustration with the engagement process and structure of the survey. Many participants felt the survey was designed to elicit desired responses and that there were too many concepts contained in the survey questions, making it difficult to answer. Participants expressed the questions were confusing and many were frustrated with having character limits on their survey responses. Participants shared they would have liked a more thorough and transparent process, and more time to understand the draft Policy Statement document and proposed changes. Participants identified barriers that may have affected participation including residents not receiving mail outs, not having computer access, and apprehension about attending in-person engagement activities due to the Covid-19 pandemic.	Staff have noted this feedback and will use it in future public engagement process design, including design of a survey planned for distribution following first reading of a Policy Statement bylaw: The Policy Statement Amendment Project's Communications and Engagement Plan calls for the following elements after first reading: • A Trust Area-wide mailout with information about the Islands Trust, the draft Policy Statement, and how they can provide feedback • A survey, available online and hard-copy • An online information session • Local events/opportunities to provide feedback locally as requested by each local trust committee/island municipality

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	Many participants also commented there should have been more transparent engagement with First Nations and some expressed a concern with the approach taken by Islands Trust to hold separate engagement processes. These participants noted they would have liked to have had the opportunity to learn and share their perspectives with each other, and by holding separate activities, there is a lack of transparency in the process.	Feedback provided by Indigenous Governing Bodies is available in the Project Library on the Islands 2050 website .
General policy structure	Need for simpler structure and language in the Policy Statement. Comments on the Policy Statement were that it was vague, confusing, and technical, and that the document contains too many overlapping themes, a lot of repetition, and did not express the concepts well.	The revised draft has been drafted in a manner that is relevant to address this feedback.
	There was strong support for a Glossary of Key Terms to be added to the draft new Policy Statement.	The revised draft contains a new Glossary of Terms section.
Governance	Many participants shared concerns that Islands Trust is expanding its mandate to include climate change, affordable housing, forestry, agriculture, community, and Reconciliation. Many considered these policy mandates to overlap with existing regulations by other levels of government and questioned whether Islands Trust staff has the expertise or capacity to implement the scope of these policy changes.	Trust Council reviewed this feedback before directing changes to the draft document. Staff have continued to ensure that draft policies set out in the document address matters within Islands Trust jurisdiction. Advocacy policies about topics outside the Islands Trust jurisdiction have been removed. The Islands Trust Council has struck a Governance Committee to review governance matters. (see Governance Committee webpage for more information)
	Many responses from participants indicated that they would like less involvement from Islands Trust in local decision-making, that Islands Trust is becoming too large, or that it shouldn't exist at all. Some expressed concern that the draft new Policy Statement is an effort of Islands Trust to gain more control and centralize decision-making and governance in the Islands Trust Area.	In October 2024, Islands Trust Council re-requested a Provincial review of the Islands Trust. The Minister of Municipal Affairs and Housing responded in April 2025 that he is not in a position to consider a review of the Islands Trust Act prior to the next general local elections.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	With respect to governance, some participants shared that Islands Trust should include First Nations representatives on Trust Council, and others recognized First Nations' right to self-govern. Some participants were concerned about Islands Trust's financial accountability in terms of policy changes that they perceived would broaden the Islands Trust mandate and thereby increase budgetary needs and impact taxes. Some participants asked that Islands Trust review their governance model before moving forward with updates to the Policy Statement.	
Reconciliation	While most agree with and support Reconciliation work and are happy to see inclusion of Reconciliation policies in the draft Policy Statement, many participants noted this is a complex topic and that it has overlapping responsibility with other levels of government. Some shared that Islands Trust doesn't have the expertise, funding or jurisdiction to address this, and that many actions are already being taken by senior governments. Participants shared a sentiment that relationships with local bands are better built at the local level. Need for more information about Reconciliation and how it will affect decision-making. There was a recognized need across all engagement activities for more broad and genuine engagement with First Nations on the Policy Statement, and a concern about how engagement has been handled by Islands Trust to date.	Reconciliation work is ongoing at Islands Trust. Efforts to build relationships are underway at staff-to-staff and leadership-to-leadership levels. These efforts are uneven across the Trust Area and Islands Trust recognizes that it has much to improve on, and is taking actions to improve. The revised draft includes a new Indigenous Inherent Rights Acknowledgment section that is relevant to this feedback: 1.3 – Indigenous Inherent Rights Acknowledgment <i>Islands Trust Council respectfully acknowledges Indigenous inherent rights as protected under section 35 of the Constitution Act, 1982. Islands Trust Council respectfully acknowledges Indigenous rights to self-governance and the expressed interest of Indigenous Governing Bodies in working toward co-governance of the Islands Trust Area. Islands Trust Council is committed to advancing reconciliation with Indigenous Governing Bodies through ongoing discussion and recognition of these rights.</i> <i>Given the Declaration on the Rights of Indigenous Peoples Act and the evolving legislative landscape in British Columbia, the Policy Statement serves as a starting point for improved cooperation with Indigenous Governing Bodies. Islands Trust Council commits to an ongoing effort to co-develop planning and land use management processes with Indigenous</i>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	Many participants would like to see a definition of terms such as “Indigenous ways of knowing” and want to better understand how this will be used in decision-making.	<i>Governing Bodies within the Islands Trust Area and acknowledges that this document does not serve as an endpoint. Islands Trust Council will be informed by the United Nations Declaration on the Rights of Indigenous Peoples as a framework for its approach to reconciliation.</i> In addition, the revised draft of the Policy Statement contains several principles relevant to this feedback: 2.1.1. Acknowledge and Respect Indigenous Rights <i>To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples, and to work together with Indigenous Governing Bodies and Indigenous Knowledge Holders to preserve and protect culturally significant areas, sites, and species.</i> 2.1.2 Prioritize Environmental and Indigenous Cultural Heritage Protection <i>To place priority on preserving, protecting and restoring the environment, and preserving, protecting, and supporting restoration of Indigenous cultural heritage in all decision making.</i> 2.2.1 Guidance from Truth and Reconciliation Commission <i>Be informed by the 10 principles established by the Truth and Reconciliation Commission of Canada (TRC).</i> 2.2.2 Guidance from United Nations Declaration on the Rights of Indigenous Peoples <i>Be informed by the articles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).</i> 2.2.3 Guidance from Missing and Murdered Indigenous Women and Girls Calls for Justice <i>Be informed by the principles for change used by the National Inquiry into Missing and Murdered Indigenous Women and Girls.</i> 2.2.4 Guidance from Indigenous Governing Bodies <i>Be informed by guidance from Indigenous Governing Bodies and Indigenous Knowledge Holders.</i> 2.3.3 Work Towards Collaborative Governance with Indigenous Governing Bodies

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<i>To work towards building strong relationships and foundations for collaborative governance with Indigenous Governing Bodies, including through the development of shared decision-making agreements under the Declaration on the Rights of Indigenous Peoples Act.</i> See also Goals 1 and 2 in the draft new Policy Statement for directive and advisory policies related to reconciliation and engagement with Indigenous Governing Bodies. The term “Indigenous ways of knowing” has been removed from the revised draft definition of “Indigenous Knowledge” is included in the new Glossary of Terms section. For more information generally, Islands Trust’s webpage about Reconciliation and Trust Council’s Policy on First Nations Engagement Principles