

Appendix A – Correspondence Material

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From: Laura Patrick <lpatrick@islandstrust.bc.ca>
Sent: Thursday, July 30, 2026 7:02 PM
To: Jon Spalding <[REDACTED]>
Cc: Kristina Evans <kevans@islandstrust.bc.ca>; Dag Falck <dfalck@islandstrust.bc.ca>; Kim Stockdill <kstockdill@islandstrust.bc.ca>; SouthInfo <SouthInfo@islandstrust.bc.ca>
Subject: Re: Shoreline construction zoning

Jon,

Thank you for taking the time to share your thoughtful observations and recommendations regarding shoreline management in the Gulf Islands. I appreciate the depth of experience you bring, both professionally and personally, and the perspective you have gained through your work with the Board of Variance.

You have identified an important challenge that extends well beyond any single application or local trust area. As climate change, sea level rise, coastal erosion, and geotechnical hazards continue to affect our shorelines, it is becoming increasingly important that the Islands Trust considers these issues through a coordinated, Trust Area-wide lens rather than through a patchwork of individual bylaws and policies developed over many years.

I agree that this is an area where we should be looking ahead. A comprehensive review of shoreline planning, hazard management, and regulatory approaches would help us better understand where our current framework is working well, where improvements may be needed, and what opportunities exist to provide greater clarity and consistency for both property owners and decision-makers. Such a review should also consider the diversity of shoreline conditions across the Trust Area, climate adaptation, environmental protection, and the role of nature-based solutions alongside engineered approaches.

As a new Trust Council is elected this fall, it will be important that trustees receive a robust assessment of the key strengths, weaknesses, opportunities, and threats facing the organization before they establish strategic priorities. In my view, the future management of our shorelines and coastal hazards is one of the strategic issues that deserves consideration as part of that broader discussion.

I have copied our staff so that your comments can be captured on the record.

Thank you again for taking the time to write and for contributing constructively to this important conversation. I value your insights and hope they will help inform future discussions about how the Islands Trust can proactively respond to the changing challenges facing our coastal communities.

Laura Patrick

On Jul 30, 2026, at 1:48 PM, Jon Spalding <[REDACTED]> wrote:

FW: Shoreline construction zoning

I wanted to bring a suggestion forward regarding a more proactive approach to managing construction in shoreline areas susceptible to erosion, flooding, etc caused by the rising ocean high-water levels, in the Gulf Islands. By way of background, I sit on several Boards of Variance and recently the North Pender Board heard an application for a relaxation of setback to use several methods to manage erosion of the shoreline, which had already resulted in the destruction of several structures. I think that the Board in this case made several important observations and I would recommend that decision makers and staff at the Trust acquaint themselves with those observations. As it is not the role of a Board to make recommendations, I want to ensure that it is understood that I do not speak for the Board, but rather from the perspective of over 70 years living on the waterfront in the Gulf Islands. I also have had mixed professional experience with the jurisdictional framework for shoreline development in my career as a port and airport planner, amongst other endeavours.

As an observation, many waterfront properties in the gulf islands, particularly those sited on unconsolidated sediments, demonstrate significant erosion, loss of property and undermining of well established buildings/residences. A case in point is the house that my grandparents built on South Pender in the early 1950's. The impact of higher and more intense winter storms has undermined the shoreline, washed away several meters of property and caused the foundation of the house to move quite significantly. I would add that these changes have occurred noticeably in the past 10-15 years.

In the case of the recent BOV application on North Pender, the applicant invested 7 months of time and many undisclosed multiple tens of thousands of dollars in three different disciplines of engineering to put together an application. While each of the Board members has had professional exposure to shoreline management, none of us would claim engineering expertise in managing erosion or marine geohydrology. In my case, I had to make a decision based on my perception that the shore was eroding, was causing damage to structures and would continue if unchecked. I and other members of the BOV were immediately concerned that the delays caused by the planning decision making process could have resulted in significant further damage to this individual's property, particularly if they missed a window for construction of the various remediation options.

I understand from conversations with Trust planners that strategy of the Trust is to have a baseline of construction and design guidelines (setbacks) to generally support development. Exceptional cases, like the hardship of a rapidly eroding shoreline, are dealt with by putting the onus on the property owner to both identify and quantify the issue, as well as to develop a design, engineering and construction solution. While this precautionary approach is understandable, it creates a tremendous cost, and not necessarily value on the property owner, while not directly addressing the immediate risk of further loss in a timely fashion.

Understanding that simple and universal solutions are unlikely to exist, I had an idea that may help manage both the community development standards via planning policy and bylaws, as well as the risk to affected property owners. Given that climate change and subsequent increases in ocean levels is generally an accepted reality, the Trust, like many other coastal local governments, should be getting out in front of the increasing requirements for shoreline management and/or remediation that have begun and will likely increase over time. My suggestion is that the trust work towards establishing a zone and/or policy framework that establishes specific requirements for construction of shoreline management solutions, as well as reconstruction of damaged shoreline structures. In my perfect world, the zone and/or policy would apply to identified shoreline properties, areas where the geology was affected by stormwater and overland flow. In areas which are sustained by longshore drift, a different approach would be necessary. The policies would not apply to the typical rocky shorelines of many of the gulf islands. I would anticipate that the policies would require that a property owner continue to undertake data gathering to identify the hazardness of the site as well as appropriate solutions, which would need to be certified by a designated professional.

I believe that the value of this approach would be to cut out the BOV and enable staff to deal with specific technical issues related to the safe remediation and reconstruction of a site. Where the properties are not currently developed it could enable staff to address the potential risks and hazards proactively, before site development occurs. Finally, having a specific shoreline remediation zone would enable staff to create clear and concise standards for design, layout and construction, that would ultimately help satisfy community perceptions of the appropriateness of various shoreline remediation initiatives.

From: Friends of the Gulf Islands <friendsofthegulfis@gmail.com>
Sent: Monday, August 10, 2026 7:56 PM
To: Executive Admin
Subject: Infrastructure Projects Act

Dear Executive Committee

On behalf of the Friends of the Gulf Islands Society, I am writing in regard to the recent disclosure that the provincial Infrastructure Projects Act will not exempt the Trust Area as has some other recent provincial legislation.

We are very concerned about the "expedited environmental assessments" that could occur under this legislation. Further, CAO Bronee stated at the July 29th EC meeting and as was reported in the August 5 issue of the SSI Driftwood, "...under the legislation, local trust committees would essentially be treated the same as local government boards and councils." and that the "legislation also then gives the Minister of Infrastructure the ability to essentially impose a solution" on the proponents and the LTC.

We see in the briefing prepared for the July 29 EC meeting, that two key sections of the legislation are mentioned:

There are two key sections of the legislation that are most directly relevant to Islands Trust:

- Division 2 enables a "specified authority" to ask the Province to exempt or modify certain provincially legislated land-use planning requirements for a designated project. This effectively allows local governments to ask the province to temporarily waive provincial land use planning rules, such as official community plan updates, to avoid delays on designated projects supported by the local government.
- Division 3 requires a local government to enter into a process with a proponent of a provincially designated project to resolve/remove any of its bylaws or policies that might be a constraint on a designated project. But if an agreement cannot be reached between the parties, then the Province would have the ability to impose a solution.

Reducing the environmental reviews of projects and eliminating jurisdiction of local OCPs goes directly against the Preserve and Protect Mandate. This legislation would seem to present a serious threat to the essential special protections intended by the Islands Trust Act and mandate. We urge you to put this item on the agenda for the Trust Council meeting and recommend that Trust Council officially request that the application of this legislation to the Islands Trust area be removed from this legislation.

Sincerely,

Jennifer Margison
President

Infrastructure Projects Act

August 14, 2026, submission to Trust Council re: policy 1.3.1

Submission to Trust Council regarding policy 1.3.1 “Policy Statement Implementation”.

August 14, 2026

Trustees,

On June 5, 2026, I was provided the opportunity by Trust Executive Committee to make a delegation presentation on three issues: (1) deficiencies in the 2025 draft Trust Policy Statement amendment, (2) deficiencies in the 2025-26 budget, and (3) revision of administrative policy 1.3.1 to bring it into full compliance with section 15(4) of the *Islands Trust Act* and section 478 of the *Local Government Act*.

On June 16th I provided an oral presentation to Trust Council on the first two issues and my speaking notes for those issues are attached at the end of this submission. I agreed with the Trust Executive Coordinator to make my submission on policy 1.3.1 in writing to provide the necessary analysis to document the deficiencies in this policy and to recommend corrective measures for Trust Council's consideration.

Trust administrative policy 1.3.1 “Policy Statement Implementation” provides the procedures for the Trust Executive Committee to approve bylaw referrals. This submission identifies several key deficiencies in policy 1.3.1.

- It provides an incomplete legal interpretation of the “contrary to or at variance with” test In Section 15(4) of the *Islands Trust Act* without reference to the “at variance with” part of that test,
- It relies on a simple checklist of directive policies from the Trust Policy Statement to review a bylaw referral without including the applicable Official Community Plan provisions that have been approved by the Minister of Municipal Affairs.
- It allows Trust Executive Committee to circumvent the requirement in section 478 of the *Local Government Act* to ensure that all bylaws are consistent with the Local Trust Area's Official Community Plan provisions.

This submission calls for reform of Trust administrative policy 1.3.1 by:

- revising the “absolute and direct collision” interpretation for the application of the “contrary to or at variance with” test in section 15(4) of the *Islands Trust Act* to address the “at variance with” part of that test,

- including the relevant Official Community Plan provisions that implement applicable directive policies directly into the review process for review of land use bylaws to ensure compliance with section 478 of the *Local Government Act*.
- incorporating the needed revisions to policy 1.3.1 into the Trust Policy Statement so the public can comment on the proposed changes, and the finalized changes can be reviewed and approved by the Minister of Municipal Affairs.

The ecological mandate of the Trust

Islands Trust Council is responsible for carrying out its legal duty to preserve and protect the unique amenities and environment of the Trust Area for the benefit of the residents of the Trust Area and of British Columbia generally. In his April 28, 2025, letter to Trust Council, former Minister of Municipal Affairs, the Honourable Ravi Kahlon reminded Trust Council that their core priority is to carry out this “ecological mandate of the Trust.” Minister Kahlon added:

It is my expectation that the Trust Council recognizes that this requires careful deliberation and consideration of perspectives to manage expectations of growth, development and local economies without exceeding the carrying capacity of local ecosystems and preserving unspoiled natural amenities.

The Trust Policy Statement is the main tool used by Trust Council to carry out its statutory duty to uphold the ecological mandate of the Trust. The purpose of the Policy Statement is to articulate the specific priorities and policies to preserve and protect the unique amenities and environment of the Trust Area. As Minister Kahlon pointed out, managing growth and development within the ecological mandate of the Trust Area is the primary responsibility of Trust Council along with preserving its “unspoiled natural amenities.”

The current Trust Council has attempted to redefine the concept of “unique amenities” to dilute the current priority on protecting the unique environment and the unspoiled natural amenities of the Trust Area and to place a higher priority on development focused issues. Council has persisted in attempting to insert “housing, infrastructure, tourism and livelihoods” into the meaning of unique amenities and rewriting the Trust Policy Statement to place more emphasis on development issues and less on the ecological mandate of the Trust.

Former trustee David Greer’s February 1, 2026, letter to Trust Council provides a detailed history of the preserve and protect mandate of the Trust, and Trust Council’s misguided attempt to redefine unique amenities focusing on development issues rather than the

preserve and protect object of the Islands Trust Act. In his February 17, 2026, letter to Trust Council, municipal law expert Don Lidstone has called into question Council's misinterpretation of "unique amenities" and the failure of the draft Policy Statement to prioritize the ecological mandate of the Trust. Both the Greer and Lidstone documents offer special insights in understanding how the current Trust Council has lost its focus on the ecological mandate of the Trust.

Official Community Plans apply Trust Policy at the local level.

To understand the application of policy 1.3.1, it is necessary to examine the role Official Community Plans play in the process. Section 15(2)(b) of the *Act* authorizes the Trust to establish different policy applications for different parts of the Trust Area. The Trust Policy Statement includes directive policies that identify general policy objectives and requires each Local Trust Committee to address each directive policy objective in its Official Community Plan (OCP). This flexibility allows each Local Trust Area to apply the directive policy objective in an OCP provision that is responsive to the unique conditions of the Island(s) in that Local Trust Area.

The Trust Executive Committee will approve that OCP provision if it is not contrary to or at variance with Trust Policy and the ecological mandate of the Trust. Once the Executive Committee approves the OCP provision, it is referred to the Minister for final approval. With the Minister's approval, the OCP provision implementing the general directive policy becomes the applicable Trust policy for that Local Trust Area.

Land use bylaws must be consistent with the OCP.

Section 478 of the *Local Government Act* establishes that all bylaws enacted by a Local Trust Committee must be consistent with the OCP that was approved by the Minister. This means that every bylaw that is enacted by the LTC must be consistent with the applicable OCP provision.

As an example, Trust directive policy 5.2.4 states:

Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address any potential growth rate and strategies for growth management that ensure that land use is compatible with preservation and protection of the environment, natural amenities, resources and community character.

South Pender Local Trust Committee implements this general policy directive with the following OCP requirements which were approved by the Minister of Municipal Affairs. The South Pender OCP requires trustees:

August 14, 2026, submission to Trust Council re: policy 1.3.1

2.2.2 To protect the natural features and biological diversity of the island and its immediate surroundings,

2.2.4 To ensure land use, development, and associated servicing are compatible with the rural island character and that their growth is gradual and sustainable;

South Pender OCP provision 2.2.2 and 2.2.4 become the applicable policy implementation for Trust policy directive 5.2.4. Any subsequent land use bylaw enacted by the South Pender LTC must be consistent with these OCP provisions as provided by the *Local Government Act*.

Policy 1.3.1: Policy Statement implementation.

As noted above, Policy 1.3.1 provides administrative guidance for trustees and staff to review and approve Local Trust Area bylaws enacted under the Trust Policy Statement.

Section 15(4) of the Islands Trust Act states that:

A bylaw submitted to the executive committee...must not be approved by the executive committee or the trust council... if it is contrary to **or at variance with the trust policy statement**. (emphasis added)

Section A.4 of policy 1.3.1 which was initially approved in 1994 states:

As interpreted by the courts, "contrary to or at variance with," means that there is an absolute and direct collision between the local trust committee or island municipality bylaw and the Policy Statement.

It is my respectful submission that administrative policy 1.3.1 fails to give full effect to section 15(4) of the Islands Trust Act by not fully considering the "at variance with" portion of the statutory test.

Policy 1.3.1 relies on a check list of all general directive policies but fails to include specific reference to the applicable OCP provisions that have been approved by the Minister and which implement the directive policies for application in that Local Trust Area.

Based on recent court judgements (Vavilov and Auer), the above policy interpretation of "absolute and direct collision" is correct with respect to the "contrary to" part of the test. However, the absolute and direct collision application does not address the "or at variance with" part of the test. Words in a statute must be given their normal meaning. The "at variance with" part of the test does not bear the same meaning as "contrary to". Contrary to means "the opposite of", while at variance with means "inconsistent with." The fact that

“contrary to” is joined to “at variance with” by the article “or” emphasizes that the two parts of the test have a different but related meaning.

As prescribed by the *Local Government Act*, any bylaw enacted by trustees must be consistent with applicable OCP provisions. Policy 1.3.1 relies on a check list of general directive policies without reference to the specific OCP provisions that implement applicable directive policies. This omission leaves a gap in the analysis and allows the Executive Committee to “skip over” the applicable OCP policy requirement and only reference the general Trust wide policy objective contained in the directive policy framework when approving a bylaw.

The requirement in section 478 of the *Local Government Act* that bylaws be “consistent with” the OCP provision reflects the not “at variance with” part of the section 15(4) test that bears a parallel meaning to the “consistent with” requirement. The “absolute and direct collision” interpretation in policy 1.3.1 does not give meaning to the not “at variance with” part of the test and therefore fails to apply a relevant provision in section 15(4) of the *Islands Trust Act*.

The example of Bylaw 129.

The South Pender LTC recently passed Bylaw 129 which increases house size allowance depending on lot size and reduces side lot setbacks. The current average house size on South Pender is approximately 1,850 ft², based on assessment data records which is one of the indicators of the rural character of South Pender. Bylaw 129 will increase house size allowance to between 3,000 ft² on smaller lots under an acre and up to 4,500 ft² on larger lots. The predictable result of this bylaw over time is that the smaller rural style homes will be replaced by much larger houses impacting the rural character of South Pender. Bylaw 129 will accelerate growth and development and impact the rural community character of South Pender, one of the unique amenities requiring preservation and protection under the ecological mandate of the Trust.

Because residential development occurs predominantly along the coastal zone on South Pender, increased growth and development will impact the unspoiled natural amenities and the biological diversity of the sensitive ecosystems in that zone. We have seen the results of overdevelopment in the Muskoka region that has fundamentally changed the environmental and economic values of that region. The Islands Trust Act guards against a similar scope of development for the Trust Area and its communities.

In approving Bylaw 129, referred to by some as “build bigger houses closer together”, the Trust Executive Committee relied on the “contrary to” part of the statutory test in section 15(4) of the Act and found that the increased house size allowances in Bylaw 129 were not in absolute and direct collision with the general directive policies in the Trust Policy Statement.

The Executive Committee did not address whether the Bylaw 129 was at variance with: (a) *“protection of the natural features and biological diversity”* of the island’s Coastal zone (required by OCP 2.4.2), or (b) *whether the increased development is compatible with the rural island character and that the resulting growth will be gradual and sustainable* (OCP 2.4.4). The Executive Committee failed to address whether Bylaw 129 was at variance with these OCP provisions that had been approved by the Minister.

Nor did the Executive Committee address whether Bylaw 129 was consistent with these OCP provisions as required by the Local Government Act.

However, the decision of the Executive Committee to adopt Bylaw 129 is a decision of the Trust and is now part of the South Pender Land Use Bylaw. The issue is not what to do about Bylaw 129. The only way to challenge that decision is by judicial review, an expensive proposition. The issue, rather, is what to do with the flawed policy 1.3.1 that allowed Bylaw 129 to slip through the statutory protections that, in my view, should have prevented its adoption.

The Islands Trust is a fiduciary trust

It is not unusual for bureaucracies to adopt policies that may seem convoluted by some community members and may leave open loopholes that can allow decisions that appear inconsistent with the object of the legislation. However, the Islands Trust is more than a bureaucracy. It is a fiduciary trust, and trustees have a legal duty to uphold the ecological mandate of the Trust for residents of the Trust Area and British Columbians generally.

It is my submission that the outdated administrative policy 1.3.1 fails to give full effect to the “contrary to or at variance with” test in section 15(4) of the Islands Trust Act and it fails to apply the Local Government Act requirement that all bylaws must be consistent with the OCP. In my view the time is long overdue to review and revise the 1994 policy 1.3.1 to bring it into full compliance with applicable legislation.

Perhaps more importantly, the policy for reviewing and approving bylaws is pivotal for implementing Trust policy and should be incorporated into the Trust Policy Statement. That would allow for public comment on the policy before it is finalized and require approval by the Minister of Municipal Affairs before its adoption.

Based on the foregoing, I recommend:

1. That Trust Council initiate a review of administrative policy 1.3.1 to amend the “absolute and direct collision” interpretation which now only addresses the “contrary to” portion of the test in section 15(4) of the *Islands Trust Act* and include provision to also address the “at variance with” portion of the test.

August 14, 2026, submission to Trust Council re: policy 1.3.1

2. That Trust Council revised policy 1.3.1 to include the relevant Official Community Plan provisions for the Local Trust Area that apply to the bylaw under review to address the consistency requirement in section 478 of the *Local Government Act*.
3. That the revised policy 1.3.1 incorporate the needed revisions to policy 1.3.1 into the Trust Policy Statement so the public can comment on the proposed changes, and the finalized changes can be reviewed and approved by the Minister of Municipal Affairs.

Thank you for considering my views.

Paul Petrie
South Pender Island

The Object of the Trust

The Islands Trust was established in 1974 to control the surge of development and the carving up of sensitive ecosystems for real estate parcels. The purpose of the Trust then, and remains today, to limit growth and development to avoid degradation of the unique amenities and environment that these special islands are blessed with.

Minister Kahlon's April 2025 letter to Trust Council affirmed that the "ecological mandate" of the *Act* is still the core priority of the Trust and that Trust Council must "manage expectations of growth, development and local economies without exceeding the carrying capacity of local ecosystems and preserving unspoiled natural amenities." Despite this, following its May 6, 2025, Trust Council meeting to review its 2023 interpretation of the object of the Trust, Trust Council reaffirmed its position that "unique amenities" also includes housing, livelihoods, infrastructure and tourism which must be "balanced" with preserving and protecting the environment.

The February 17, 2026, detailed letter to Trust Council from local government legal expert, Don Lidstone, clearly shows how that redefinition of "unique amenities" is at variance with the object of the *Act*. The current Trust Policy Statement "places priority on preserving and protecting the integrity of the environment and amenities in the Trust Area." It is my submission that Trust Council's redefinition of unique amenities weakens that priority with the inclusion of development leaning issues of housing, livelihoods, infrastructure and tourism.

Trust Policy Statement Review

Over the last two terms Trust Council has devoted considerable staff resources and budget allocation to reviewing and re-reviewing the Trust Policy Statement, the purpose of which, under section 15 of the *Act* is to direct how Trust Council will carry out the object of the Trust.

The current Trust Policy accurately reflects the object of the Trust, stating that "planning must account for the cumulative effects of existing and proposed development so as to avoid detrimental effects on watersheds, groundwater supplies and Trust Area species and habitats." Exceeding carrying capacity destroys the very natural beauty and rural character that draws islanders to these ecologically fragile islands in the first place and risks future ecological collapse.

Trust Council's latest draft to the Trust Policy Statement dilutes that ecological priority by redefining "unique amenities", and by implication failing to follow the guidance provided by the Minister responsible for the Islands Trust.

The 2025 draft Trust Policy Statement has increased the focus on preserving and protecting development issues rather than strengthening the priority on the ecological mandate and preserving and protecting the unspoiled natural amenities in the Trust Area in several ways including:

- it shifts away from limiting growth to managing it,
- it deletes the current Trust Policy Statement text that warns against the impact of increasing pressure from population growth and tourism,
- it omits the current Trust Policy Statement text that calls for respecting existing density limits to preserve rural community character,
- it directs LTCs to identify suitable locations where density could be increased.

The April 29, 2026, report to Trust Council from the “Be the Change” consultants summarized the results of the public consultation as follows:

Across both the survey response and public correspondence, there is broad support for the overall goal of preserving and protecting the Islands Trust Area, including in relation to ecosystems, water, and land protection.

Given the strong support for maintaining the priority on the ecological mandate of the Trust and significant public opposition to the draft Trust Policy, it would seem prudent to leave the draft as is and allow a newly elected Trust Council to take a fresh look at the public response to the draft Trust Policy Statement feedback and determine whether the draft Trust Policy Statement accurately reflects the ecological mandate of the Act and to what extent the current Trust Policy Statement requires further amendment particularly in the areas of First Nations consultation, the impacts of climate change and “sustainable affordable housing”.

Taxpayer subsidies and cuts to Environmental Protection

In the last decade the Trust Area has experience a population boom with a growth rate more than three times the provincial rate. This accelerated growth has intensified the pressure for development throughout the Trust Area. This pressure has increased the demand for housing and has led to an increase in development applications throughout the Trust Area.

Particularly concerning is the fact that the cost of processing these development applications far exceeds the fees collected to process them. Trust data shows that development application fees cover less than 15% of the processing costs for these applications.

This means that local island taxpayers are subsidizing development applications by approximately 85% to the tune of over a million dollars annually. Yet Trust Policy 5.6.1

expresses the intent “to recover from applicants’ 100 percent of the average cost of processing the applications.” It appears that the current Trust Council has pushed this issue forward to be dealt with by the new Trust Council in 2027.

In the recent budget debate Council voted to completely remove funding for the proposed permanent professional biologist position that was intended to provide consistent, scientifically backed environmental review of development applications. A small portion of the “unclaimed” development fees could easily have funded this critical position that would have provided expert guidance to ensure that development applications do not result in environmental degradation or compromise the carrying capacity of affected ecosystems.

As an established land trust, the Islands Trust has a moral and fiduciary responsibility to support Canada’s binding international commitment to protect 30% of its lands by 2030 to reverse biodiversity loss and fight climate change. As of 2019 the Trust had protected 18% of the 7,000 ha. in the Trust Area. Over the last seven years the Trust has protected only 2% more of the Trust Area leaving a full 10% to be protected in the next four years to meet the Canadian and Provincial goal of protecting 30% by 2030. The recent reduction in the Conservancy’s budget during the budget review has most certainly compromised the Conservancy’s capacity to meet this important target.

To conclude, I urge Trust Council:

- to take positive and immediate steps to increase development application fees to more fully cover the cost to the Trust for processing these applications and end the subsidies to development applications by island taxpayers,
- identify additional savings in the budget to fund the permanent professional biologist position in the upcoming term,
- and identify the steps necessary to meet Canada’s international commitment to protect 30% of land in the Trust Area by 2030.

Thank you for considering my views.

Paul Petrie
South Pender Island

From: Murray Reiss <[REDACTED]>
Sent: Friday, August 14, 2026 9:03 PM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Project Act

Dear Trustees --

The recently passed Infrastructure Projects Act puts a huge hole in protection for the Trust area islands. The Act allows the Province to designate certain “infrastructure projects” for expedited approval, including reducing comment periods, waiving requirements for consistency with local Official Community Plans, and substituting analysis of private consultants for those by government staff. This includes projects delivered by the Province, local governments, First Nations, Crown agencies, or private proponents.

I implore you to urge the Province to strike the Islands Trust from this legislation.

Otherwise, it will make a mockery of the very essence and purpose of the Trust.

yours,

Murray Reiss

Salt Spring Island

From: Deborah Miller <[REDACTED]>

Sent: Friday, August 14, 2026 5:19 PM

To: information <information@islandstrust.bc.ca>

Subject: Infrastructure Project Act

To Whom It May Concern;

The Infrastructure Project Act seems ill conceived and I am requesting that you work to take the Islands Trust out of this legislation which could be devastating for our islands unique ecosystems.

Thank you.

Sincerely,

Deborah Miller

Sent from my iPad

-----Original Message-----

From: Judy Mitchell1 <[REDACTED]>

Sent: Saturday, August 15, 2026 7:48 PM

To: information <information@islandstrust.bc.ca>

Subject: Infrastructure Projects Act

Dear Trustees,

I am writing to urge you to press the provincial government to exclude the gulf islands from the above Act.

PLEASE and thank you. 🙏

Respectfully submitted,

Judy Mitchell

Salt Spring Island

From: SUSAN EVANS <[REDACTED]>
Sent: Saturday, August 15, 2026 5:59 PM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Projects Act

To: Trust Council Trustees

I'm writing to urge Trust Council to ask the Province to exempt the Islands Trust from the Infrastructure Projects Act. Oversight must not be loosened on our provincially-protected islands.

Sincerely,

Susan Evans
Salt Spring Island

From: Elizabeth White <[REDACTED]>
Sent: Saturday, August 15, 2026 3:07 PM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Project Act

Dear Trust Council,

Bill 15, the Infrastructure Projects Act passed in May 2025, introduces a gaping hole in protection for the Trust area islands. The Act allows the Province to designate certain “infrastructure projects” for expedited approval, including reducing comment periods, waiving requirements for consistency with local Official Community Plans, and substituting analysis by private consultants for analysis by government staff. Included are projects delivered by the Province, local governments, First Nations, Crown agencies, and private proponents. This law, pending associated regulations, is so vague that it allows wide discretion in what may be considered subject to its parameters. Its reach includes mines, pipelines, and private housing projects.

Our provincially-protected islands are not a place to loosen oversight of development.

This is an urgent matter that in my view requires action at your September meeting.

I urge you to request the Province exclude the Islands Trust area from this legislation.

Yours truly,

Elizabeth White
Salt Spring Island, BC
[REDACTED]

sent from the unceded territories of Hul'qumi'num and SENĆOŦEN speaking peoples

From: John Moore <[REDACTED]>
Sent: Saturday, August 15, 2026 2:26 PM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Project Act

Dear Islands Trustees:

The Infrastructure Project Act represents dangerous overreach of government action. It certainly has no place in the Gulf Islands and accordingly should not apply to us. I urge you to press the Province to, at very least, exempt us from this measure.

With best regards,

John Moore

[REDACTED]

Salt Spring Island

BC Canada [REDACTED]

Mobile: [REDACTED]

[REDACTED]

From: Phil Vernon <[REDACTED]>
Sent: Saturday, August 15, 2026 10:18 AM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Project Act

To the Trustees,
Islands Trust

I am writing out of concern regarding the BC government's passing the Infrastructure Project Act which will enable it to override local bylaws and regulations.

This poses a serious threat to the effectiveness as well as the core mandate of the Islands Trust.

I urge Trustees to immediately call upon the Province to remove the Islands Trust from the Infrastructure Project Act legislation.

Sincerely,

Philip Vernon
[REDACTED]
Salt Spring Island, BC

[REDACTED]

From: Lynne Raymond <[REDACTED]>

Sent: Saturday, August 15, 2026 8:30 AM

To: information <information@islandstrust.bc.ca>

Subject: Trust

I am asking that the Trustees take the Islands Trust from Bill 15!!! I have lived on the island for 31 years and have relied on the trust not to wreck this beautiful part of the world . We have a finite amount of water that developers would soon forget and an over densification that would not suit an island. Please protect The Islands Trust, we must keep it strong and in place. Lynne Raymond Sent from my iPad

From: Charles Kahn <[REDACTED]>
Sent: Saturday, August 15, 2026 7:41 AM
To: information <information@islandstrust.bc.ca>
Subject: Bill 15

Hello:

This new bill when passed could allow much destruction to the BC environment. Please ask the province to strike the Islands Trust from the legislation. The new act would be counter to the preserve and protect strictures of the Islands Trust Act.

Thank you for your consideration and help with this important issue.

Charles Kahn

[REDACTED]

Salt Spring Island, BC [REDACTED]

[REDACTED]

I respectfully acknowledge that I live and work within the ancestral and unceded territory of the Hul'qumi'num and SENĆOŦEN speaking people.

From: Nancy Wigen <[REDACTED]>
Sent: Saturday, August 15, 2026 2:36 AM
To: information <information@islandstrust.bc.ca>
Subject: BC. Bill 15.

Dear Trustees

I am disturbed by Bill 15 which seems to allow the Province to disregard environmental protection and to designate certain "infrastructure projects"(what does that mean?) for expedited approval.

I urge our Island's Trustees to make sure the Trust Islands are excluded from this legislation.

We are an area of unique ecological importance that must be protected.

Thank you,

Nancy Wigen, <[REDACTED]> [REDACTED]

From: Pam Brain <[REDACTED]>
Sent: Sunday, August 16, 2026 10:57 AM
To: information <information@islandstrust.bc.ca>
Cc: Rob.Botteral.MLA@leg.bc.ca
Subject: Bill 15 - request to remove the Islands Trust from this legislation

I'm writing to urge the Trustees to request that the Province remove the Islands Trust from this potentially dangerous legislation.

The recently passed Infrastructure Projects Act (Bill 15) contains a huge hole in protections for the Trust area islands. It allows the Province to designate certain 'infrastructure projects' for expedited approval, reduces comment periods, waives requirements for consistency with local Official Community Plans and substitutes analysis by private consultants for those by government staff.

The law is so vague that it allows for wide discretion in what may be considered subject to its parameters, including pipelines and private housing projects. This poses a potential dangerous threat to our islands, and therefore we must be omitted from the legislation.

Thank you for your attention and support in this matter.

Sincerely,

Pamela Brain

Salt Spring Island, BC

From: Erna <[REDACTED]>

Sent: Monday, August 17, 2026 9:48 AM

To: information <information@islandstrust.bc.ca>

Subject: Infrastructure Project Act

Dear Trustees,

I am writing to urge you to request that the Province strike the Islands Trust from Bill 15.

The Act allows the Province to designate certain “infrastructure projects” for expedited approval, including reducing comment periods, waiving requirements for consistency with local Official Community Plans, and substituting analysis of private consultants for those by government staff. This includes projects delivered by the Province, local governments, First Nations, Crown agencies, or private proponents.

This would take the decision making process away from the Trust and the people who live here. It would place that authority in the hands of those who may not understand the mandate of “Preserve and Protect” or appreciate the sensitive nature of our environment.

Please stand up for the Trust and everything that it represents. Request that the Province strike the Islands Trust from Bill 15.

Thank you,

Erna Robertson

From: [REDACTED] <[REDACTED]>
Sent: Monday, August 17, 2026 2:22 PM
To: information <information@islandstrust.bc.ca>
Subject: Bill 15

The proposed BC Bill 15 is outrageous and would seriously conflict with the Trust's legislative mandate- to preserve and protect the islands in the Islands Trust.

Take the opportunity at the September Trust Council to strike the Islands Trust from proposed Bill 15.

Peter Lamb

From: Jean Gelwicks <[REDACTED]>

Sent: Monday, August 17, 2026 1:52 PM

To: information <information@islandstrust.bc.ca>

Subject: Bill 15

The proposed provincial Bill 15 is seriously inconsistent with the Trust mandate and current legislation.

You have an opportunity at the upcoming Trust Council meeting in September to request the provincial Government to exempt the Islands Trust from Bill 15.

Jean Gelwicks

From: elissa poole <[REDACTED]>

Sent: Tuesday, August 18, 2026 11:03 AM

To: information <information@islandstrust.bc.ca>

Subject: Infrastructurek Project Act

To Trust Council of the Islands Trust and all Trustees:

It is hard to see how Bill 15 is in any way compatible with the Islands Trust Act. Not only would it open our fragile island ecosystems to development from both private and public sectors, to mining, and to a host of unspecified infrastructure projects that can be fast-forwarded without the careful environmental studies and community engagement that our very special governing system ensures, but it treats the Islands as municipalities - the very thing Salt Spring Island in particular has voted strongly against in two referendums on incorporation.

The Islands are more under threat now than they ever have been, with climate-change drought and scarce water resources, with almost constant pressure to increase development without regulated guarantees for affordability. Bypassing our bylaws? Waiving requirements to be consistent with our Official Community Plans? Using private consultants, many of whom have very little familiarity with those bylaws, or even with the Islands Trust Act itself?

A one-size fits all approach to expediting infrastructure projects without specifying precisely what is and what is not appropriate in environmentally sensitive areas like the Islands, could spell the end of the islands we have been trying so hard to protect for the last 50 years under Provincial regulation.

I urge Trust Council to request that the islands in the Islands Trust be exempt from Bill 15.

Elissa Poole

[REDACTED]

Salt Spring Island, BC [REDACTED]

From: R Wright <[REDACTED]>
Sent: Tuesday, August 18, 2026 4:06 PM
To: Executive Admin
Cc: Rob.Botterell.MLA@leg.bc.ca; HMA.Minister@gov.bc.ca
Subject: Infrastructure Projects Act & the Islands Trust

Follow Up Flag: Follow up
Flag Status: Completed

Dear Trust Executive Committee and Council,

I write to express deep concern about potential effects on the Islands Trust Area of the recently passed Infrastructure Projects Act (IPA). As described in the press, this new enabling act gives the BC government extraordinary powers to: a) override existing environmental legislation throughout the province, b) drastically reduce required public comment periods, and c) grant Local Trust Committees the authority to waive their Land Use Bylaws and Official Community Plans, thus bypassing the powers of Trust Council and the Ministry of Municipal Affairs.

All of this would be in direct contravention of the Islands Trust Act and its "ecological mandate" to preserve and protect our islands as stated in the Trust Act's "Object" (Section 3). The newly-minted Ministry of Infrastructure could trump the power of the Municipal Affairs Ministry, which has overseen the preservation and protection of our islands for more than half a century.

While the IPA has received royal assent, it will not come into force until its regulatory framework has been developed. I therefore call on Trust Executive and Council to request strongly and urgently that the BC government exempt the Islands Trust area from the writ of the IPA. A precedent for such was set in 2024, when the province exempted the Islands Trust Act from the densification requirements of Bill 44.

Sincerely,

Ronald Wright,

Salt Spring Island

cc: Hon. Christine Boyle, Minister of Housing & Municipal Affairs

Rob Botterell MLA

From: Kirsty Barclay <[REDACTED]>
Sent: Tuesday, August 18, 2026 12:16 AM
To: information <information@islandstrust.bc.ca>
Subject: Infrastructure Project ACT: A Dangerous Provincial Act

Dear Sir or Madam,

I am very concerned about the following:

“

Bill 15 - A Danger to the Trust Islands

The BC Legislature has fallen to new lows in its disregard for the environment. The recently passed Infrastructure Projects Act puts a huge hole in protection for the Trust area islands. The Act allows the Province to designate certain “infrastructure projects” for expedited approval, including reducing comment periods, waiving requirements for consistency with local Official Community Plans, and substituting analysis of private consultants for those by government staff. This includes projects delivered by the Province, local governments, First Nations, Crown agencies, or private.

This law is so vague that it allows wide discretion in what may be considered subject to its parameters. Its reach could include mines and pipelines, even private housing projects. “

I strongly request that you (the Islands Trust Council) request that the Province strike the Islands Trust from this legislation.

Our provincially protected islands are not a place to loosen oversight of development. Thank you, sincerely,

Kirsty M Barclay

[REDACTED] SSI)

Dear Trust Council members,

I want to bring to your attention the opportunity to join me, (and Laura Patrick and Deb Morrison) as individual trustees, in signing on to the Joint Statement made by mayors, councillors and local elected leaders across Canada at the June 4 *Elbows up for Climate* Summit, June 4, 2026 in Edmonton, Alberta.

The *Elbows Up for Climate* is a growing alliance of mayors and councillors representing more than half of all Canadians, who hosted an urgent Climate Summit in Edmonton, Alberta, ahead of another devastating wildfire season, to discuss how to protect their communities from fossil fueled disasters and economic shocks. They issued the following joint statement after their deliberations. You can sign on at: <https://elbowsupforclimate.ca/support/>

There may be an opportunity for Islands Trust to participate in the campaign as an organization, and, if so, I will report verbally at the Trust Council meeting in September.

Thank you for considering this invitation,

Joint Statement

Exhaustion. Fear. Frustration. Worry. Anger. These are just a few of the emotions that we, as municipal leaders, and our residents are feeling as our communities experience wave after wave of climate disasters—with no end in sight. Drought in the B.C. interior. Flooding across northeastern Ontario and western Quebec. Heat warnings in Nova Scotia. Out-of-control wildfires in several provinces.

This is a snapshot of the climate disasters that have swept across our country in the first five months alone of 2026, impacting a staggering 1 in 5 Canadians—and as we brace for another season of wildfires, deadly smoke, heat waves and floods.

As municipal leaders from every region of this country, we have a message for the Prime Minister: **Our local communities and economies are burning. We need federal leadership on climate, not backsliding.**

The current government appears to understand climate change as a distant problem, to be addressed at some point in an undefined future. But communities across this country are living a different reality. Climate change is part of our daily lives: toxic air, water shortages, harrowing evacuations and mass displacement. It's costing us \$8.8 billion each year to rebuild our roads,

bridges, wastewater systems and infrastructure. Two-thirds of these costs are falling on municipal budgets, making life even more expensive for our residents, on top of rising energy costs and gas prices.

We can't keep rebuilding after the fires, floods, storms and droughts. **We need to prevent them in the first place.** Our way of life as Canadians depends on the well-being of our land, water, air and communities. That is why we are calling on the federal government to urgently invest in nation-**building not nation-burning** projects that lower household bills, create hundreds of thousands of jobs, and safeguard our communities:

1. **A national East-West-North clean electric grid**, powered by renewable energy not fossil gas, to make Canada a clean energy super power and secure our energy sovereignty;
2. **At least two million non-market homes** that are zero polluting, efficient and built to the highest standards, creating more affordable, transit-linked communities;
3. **Retrofits and mass heat pump and solar installations** across the country, that will cut energy bills and pollution, and spur economic activity in every community;
4. **A clean transportation system** with a national high-speed rail network, extended with Canadian-made electric buses connected to local transit; it begins by reversing cuts to federal transit funding, and scaling up investments;
5. **A national resilience, response and recovery strategy** to rebuild from the disasters already baked in, funded by a tax on excess oil and gas profits from the war in Iran. This follows the lead of our European Union allies and ensures polluters pay for the damages caused by their activities, and could generate up to \$46 billion in revenue.
6. **We are asking the federal government to stand with us:** to reject fossil fuel projects that divide us, and get to work on practical and popular projects that won't burn down our country – but build us up, Canada Strong.

Thanks for taking the time to read this and I hope you will consider adding your name to the hundreds that have already signed.

Judi

Judith Gedye | she/her

Islands Trust | jgedye@islandstrust.bc.ca | islandstrust.bc.ca | islandstrustconservancy.ca

Preserving and protecting over 450 islands and surrounding waters in the Salish Sea

Nexwlelexwm (Bowen Island) Municipal

Council | jgedye@bimbc.ca | bowenislandmunicipality.ca |

Nexwlelexwm (Bowen Island) is located in the Territory of the Squamish Nation

From: PJ Bahr <[REDACTED]>
Sent: Wednesday, August 19, 2026 9:38 AM
To: Executive Admin
Subject: Bill 15

From:
Penelope J. Bahr
[REDACTED]
Gabriola, BC
[REDACTED]

August 19, 2026

Attn: Trust Council

Bill 15 sets a dangerous precedent in my opinion and I strongly urge you to instruct the Province to exempt the Islands Trust Area from this legislation.

This Act allows the Province to use expedited approval and waives requirements for consistency with local Official Community Plans among other 'fast track' methods. Bill 15 covers private projects and those delivered by the Province, local governments, First Nations, Crown agencies. Bad enough for the province as a whole, but horrible for the Gulf Islands.

The islands in the Trust Area are not a place to relax oversight. ^[L]_[SEP] Please notify the government that you strongly oppose including the Islands Trust Area under this legislation.

Penelope J. Bahr

Dear Relatives,

Canada is introducing even more resource extraction projects that will dramatically increase fossil fuel transport to, and across, the Salish Sea. This will without any doubt accelerate the denaturing of our lands and waters and threaten the Southern Resident Orca Whales with functional extinction. These projects illustrate a disregard and disrespect on behalf of the Canadian Nation for the health of the Salish Sea, the inherent rights of the First Peoples on both sides of the border, and our sacred obligation to the salmon, the orca and all of the Creation, to the Ancestors, and to future generations.

I extend my hand to invite you to join us from 6:00-8:00 on September 21 at St. Andrew's Wesley United Church in Vancouver for, *The Seven Sisters on the Salish Sea: Our Sacred Duty*. Into this sacred space we have placed the all-Indigenous Seven Sisters to honor our Sacred Duty to the Salish Sea. The transborder, intergenerational Seven Sisters will raise up the vision, voices, and leadership to call out the dangerous and misguided principle of domination, and bring in nurturing matriarchal principles of deep remembrance, continuity of the spirit, familial ties and community, and an empathic relationality with the greatness of nature.

Please join by standing up for the Salish Sea, sharing the event on social media, and inviting your friends to join us. For more information contact:

Cedar George
Campaign Assistant
Wilderness Committee
Contact: cedar@wildernesscommittee.org
206-510-6821

Kurt Russo, Ph.D.
Executive Director
Se'Si'Le
Contact: kurt@se-si-le.org
360-961-4554

"Have I done all to keep the air fresh? Have I cared enough about the water?
Have I done everything I could to earn my grandchild's fondness?"
Geswanouth Slahoot (Dan George), Former Chief of the Tsleil-Waututh First Nation

September 21, 2026
St. Andrew's Wesley United Church
1022 Nelson St.
Vancouver, BC
6pm-8pm

Se'Si'Le presents:

Seven Sisters on the Salish Sea: Our Sacred Duty
Join First Nations People and the Seven Sisters standing up for the health of the Salish Sea.

TA-AH AMY GEORGE (TSLEIL-WAUTUTH NATION) - CHARLENE ALECK (TSLEIL-WAUTUTH NATION) - KAYAH GEORGE (TSLEIL-WAUTUTH NATION) - MARILENE SILVA KAIKUXIPA (MACUXI TRIBE, BRAZIL) -

Partners: Friends of the San Juans, NATIVE ORGANIZERS ALLIANCE, WASHINGTON CONSERVATION ACTION, Setting Sun Circle, BRAIDED RIVER, Save Our Vital Salmon, SIERRA CLUB, ecotrust canada, WILDERNESS COMMITTEE, SEVEN SISTERS RETURN OF THE MATRIARCHY.