



Islands Trust Council

Committee of the Whole Meeting Agenda

Date: Wednesday, July 22, 2026

Time: 9:00 a.m.

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	
4.1 <u>Draft Committee of the Whole Regular Meeting Minutes of May 13, 2026</u>	2 - 5
For review and adoption.	
5. FOLLOW UP ACTION LIST	
5.1 <u>Committee of the Whole Follow Up Action List</u>	6 - 6
6. BUSINESS	
6.1 <u>Discussion Items</u>	
6.1.1 Policy Statement Amendment Project: Next Steps (with Reordered Tables) - Briefing	7 - 50
7. NEW BUSINESS	
8. CLOSED MEETING (If needed)	
9. RISE AND REPORT	
10. NEXT MEETING	
The next Islands Trust Council Committee of the Whole meeting will take place electronically on Wednesday, October 7th, 2026 at 9:00 a.m.	
11. ADJOURNMENT	



Islands Trust Council Committee of the Whole Minutes of a Regular Meeting

Date: Wednesday, May 13, 2026

Location: Electronic Meeting

Executive Members Present:

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

Members Present:

5. Sue Ellen Fast, Bowen Island Municipal Trustee
6. Judith Gedye, Bowen Island Municipal Trustee
7. Sam Borthwick, Denman Island Local Trust Area
8. David Graham, Denman Island Local Trust Area
9. Susan Yates, Gabriola Island Local Trust Area
10. Lisa Gauvreau, Galiano Island Local Trust Area
11. Ben Mabberley, Galiano Island Local Trust Area
12. Mikaila Lironi, Lasqueti Island Local Trust Area
13. Jeanine Dodds, Mayne Island Local Trust Area
14. Mairead Boland, Saturna Island Local Trust Area
15. Kristina Evans, South Pender Island Local Trust Area
16. Ken Hunter, Thetis Island Local Trust Area
17. Peter Luckham, Thetis Island Local Trust Area

Members Regrets:

18. Joe Bernardo, Gambier Island Local Trust Area
19. Kate Louise Stamford, Gambier Island Local Trust Area
20. Lee Middleton, Saturna Island Local Trust Area
21. Dag Falck, South Pender Island Local Trust Area

Members Absent:

22. Alex Allen, Hornby Island Local Trust Area
23. Grant Scott, Hornby Island Local Trust Area
24. Aaron Campbell, North Pender Island Local Trust Area
25. Deb Morrison, North Pender Island Local Trust Area
26. Jamie Harris, Salt Spring Island Local Trust Area

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
Alexandra Trifonidis, Executive Coordinator
Jason Youmans, Senior Policy Advisor
Lisa Millard, Meeting Administrator/Recorder

Guests Present:

Natalie Chan, President, Be The Change Group
Ange Cullen, Senior Researcher, Be the Change Group

Others Present: There were no members of the public present

1. CALL TO ORDER

Chair Patrick called the meeting to order at 9:00 a.m.

2. TERRITORIAL ACKNOWLEDGEMENT

Chair Patrick 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

4.1 Draft Committee of the Whole Special Meeting Minutes of February 18, 2026

By general consent the Committee of the Whole Special Meeting minutes of February 18, 2026 were adopted.

5. FOLLOW UP ACTION LIST

5.1 Committee of the Whole Follow Up Action List

Received for information.

6. PRESENTATION

The Senior Policy Advisor introduced Be the Change Group representatives Dr. Natalie Chan, President and Co-Founder and Ange Cullen, Senior Researcher and Project Manager who presented an overview of the survey and analysis of public correspondence received on Phase 4 Community Engagement.

7. BUSINESS

7.1 Discussion / Decision Items

7.1.1 Policy Statement Amendment Project: Public Engagement Phase 4 Report - Briefing

The Senior Policy Advisor provided a presentation detailing the methods used during Phase 4 Public Engagement and noted the number of referral responses received and those remaining outstanding.

7.1.1.1 Q & A

It was clarified that trustees should consider feedback received in all phases of public engagement undertaken throughout the project when determining next steps.

A trustee requested First Nations referral responses be coded for clarity.

7.1.2 Policy Statement Amendment Project: Next Steps – Briefing

The Senior Policy Advisor summarized next steps and detailed potential actions for trustee consideration.

The meeting was recessed for a break at 10:13 a.m. and reconvened at 10:23 a.m.

7.1.2.1 Trustee Roundtable

A trustee roundtable was undertaken and the following themes emerged, with diverse views expressed within each theme:

- **Draft Trust Policy Statement**
 - The document is complex, should be condensed to a few pages that contain broad, simple guidelines and/or general high-level principles;
 - It is meant to be a guiding document that land use bylaws align with;
 - The document should be fulsome;
 - Enforcement of the document through Executive Committee fetters discretion of local trust committees.
- **Outstanding First Nations and Agency Referrals**
 - Weight the feedback from ministry referrals;
 - Put greater emphasis on agency referrals;
 - Meet with Indigenous Governing Bodies in person to discuss the document and honour the collaborative process;
 - Further work on the Policy Statement should not be undertaken until First Nations referrals are received;
 - Organize agency referral responses based on Policy Statement sections.
- **Survey and other public feedback**
 - Surveys open to bias and are opinions;
 - Negative comments regarding reconciliation are often a response to the Cowichan court decision;
 - There is need to listen to, and integrate, public feedback and not just agency referrals;
 - Regardless of comments received, it is important to maintain Islands Trust commitments to reconciliation.
- **Draft Implementation Plan and Companion Handbook**
 - Both components will provide clarity on the Policy Statement and help answer questions and concerns from the public.
- **Incoming Islands Trust Council**
 - Continue refining referral responses for incoming Islands Trust Council members;

DRAFT

- The outgoing Islands Trust Council could provide a letter to incoming trustees on the work of the project to date.

Trustees Boland and Hunter left the meeting at 11:30 a.m.

Trustee Dodds left the meeting at 11:38 a.m.

Discussion ensued regarding work that can be done in the coming months, need for additional Committee of the Whole meetings and content of said meetings.

Trustee Mabblerley left the meeting at 11:55 a.m.

TC-COW-2026-019

It was **MOVED** by Trustee Gedye, and **SECONDED** by Trustee Luckham, that Committee of the Whole recommend to Executive Committee to request staff to reorganize the agency referral responses according to the sections of the draft Policy Statement, and continue working on the Agency Referral Responses table (Attachment 1, May 1, 2026).

CARRIED

8. **NEW BUSINESS** - none

9. **CLOSED MEETING** - none

10. **RISE AND REPORT** – not applicable

11. **NEXT MEETING**

The next Islands Trust Council Committee of the Whole meeting will take place electronically on Wednesday, July 22, 2026 at 9:00 a.m.

12. **ADJOURNMENT**

Be general consent the meeting was adjourned at 12:11 p.m.

Laura Patrick, Chair

Certified Correct:

Lisa Millard, Meeting Administrator/Recorder

Minutes are not official until adopted at a subsequent meeting.

Follow Up Action Report

Committee Of The Whole

Director Legislative Services and Information Services

Progress	Activity	Responsibility	Dates	Status
100%	1 Staff to inform Executive Committee of COTW's recommendation that Executive Committee request staff to update the business case for Meeting Streaming & Editing Recordings for Posting to include more information on alternatives for recording and/or publicly posting meeting recordings	David Marlor	Meeting: 18-Feb-2026 Target: 27-Feb-2026	Completed

Director, Trust Area Services

Progress	Activity	Responsibility	Dates	Status
100%	1 Staff to inform the Executive Committee that Committee of the Whole recommend that Executive Committee request staff to reorganize the agency referral responses according to the sections of the draft Policy Statement, and to continue working on the Agency Referral Responses table (Attachment 1, May 1, 2026).	Clare Frater	Meeting: 13-May-2026 Target: 26-May-2026	Completed

BRIEFING

To: Committee of the Whole **For the Meeting of:** July 22, 2026
From: Trust Area Services **Date Prepared:** June 30, 2026
SUBJECT: Policy Statement Amendment Project: Next Steps (with Reordered Tables)

PURPOSE: To provide Committee of the Whole (COTW) with a re-ordered version of referral responses received up to April 2026 on the draft Policy Statement following First Reading of the draft Policy Statement in July 2025.

BACKGROUND: At the March 2026 Trust Council meeting staff advised Trust Council that the Policy Statement Amendment Project will not be completed during this term of office but that staff would continue to provide Committee of the Whole/Trust Council with engagement results as received, options for the project, as well as options for continued refinement of the draft.

On May 13, 2026 Committee of the Whole passed the following resolution which Executive Committee actioned on June 30, 2026

That Committee of the Whole recommend to Executive Committee to request staff to reorganize the agency referral responses according to the sections of the draft Policy Statement, and continue working on the Agency Referral Responses table (Attachment 1, May 1, 2026).

Revised draft tables are attached as Attachment 1. Staff have not yet had the opportunity to meet with external referral agencies to discuss proposed Islands Trust staff recommendations for revision. The referral tables provided illustrate how staff could provide advice, but further refinement and input from external referral agencies is needed prior to Trust Council consideration of amendments. Staff would appreciate COTW's feedback on the approach taken.

Not included in this agenda are referral responses from Indigenous Governing Body (IGBs). Formal responses have been received from 10 of 30 IGBs, with preliminary responses received from several others. The nature of some feedback from IGBs to date suggests that they expect a considerably deeper level of engagement than Islands Trust has provided in the current phase of this project. There are also a number of IGBs who have not yet commented but have expressed that they intend to do so, and that they are interested in staff-to-staff meetings. There have been requests for capacity funding, as well requests for meetings with Indigenous communities. These requests, paired with an expectation from the Ministry of Housing and Municipal Affairs that Islands Trust should demonstrate that it has worked toward consensus with IGBs, mean that staff cannot say with confidence when outstanding questions/concerns will be resolved, and final comments received. In the coming months, staff expect to have more capacity to dedicate to engagement with IGBs.

The Ministry of Housing and Municipal Affairs has also advised that when preparing bylaws for Ministerial review, the Trust should:

- prepare for Indigenous Governing Body input with thoughtful assessment of the potential impacts on the environment, the community, and Indigenous Governing Bodies,
- be clear about intentions and be open and genuine in seeking input,
- consider the perspectives shared,
- work towards consensus and collaboration in the policies where possible, and
- respond to the community and to Indigenous Governing Bodies about what is reasonable, practical or necessary to include in the resultant proposed bylaws.

Staff have not yet meaningfully engaged with all interested Indigenous Governing Bodies and there are still significant discussions to be continued, and in some cases, initiated. In the absence of this dialogue, it is premature for staff to propose any recommendations for amendment based on IGB feedback. The addition of the new Manager, Indigenous Relations in mid-2026 will add capacity to the team and support more respectful and responsive relationships.

ATTACHMENT(S):

- 1) Policy Statement Bylaw No. 183 Agency/ Referral Responses: DRAFT Staff Analysis

For agency/LTC/BIM referral responses received to date, see the project library of the [Islands 2050 webpage](#)

FOLLOW-UP:

While staff continue to work with referral agencies and Indigenous Governing Bodies to support additional responses and refine advice about revising the draft Policy Statement, Committee of the Whole/Trust Council/Executive Committee can continue to advance the project by:

- 1) Providing feedback to staff on the draft approach to staff comment/recommendations in response to referral responses. As it reviews more final versions of the tables in the coming months, COW will need to consider if it wishes for Trust Council to provide recommendations to the post-election Trust Council, recognizing that not all feedback from Indigenous Governing Bodies may be received before the local elections and that second reading would not be contemplated until 2027 or later.
- 2) Reviewing the [Phase 4 public engagement](#) results and providing direction to staff on that basis.
- 3) Discuss trustee expectations for the draft companion handbook
- 4) Discuss 2027/28 project budget options to inform Executive Committee's business case for funding

Committee of the Whole may wish to recommend to the Executive Committee which, if any, Policy Statement Amendment Project topics Trust Council should discuss at its September 2026 meeting (e.g. draft referral response tables, draft companion handbook, draft implementation plan, advice to Trust Council, etc.)

Staff do not recommend that Trust Council further revise the draft document prior to:

- receiving more feedback from Indigenous Governing Bodies/referral agencies or confirmation that they will not be responding, and
- staff have confirmed that collaboration has occurred on the recommended revisions.

Once Trust Council has more complete feedback and has refined the document, and completed second reading, Trust Council will need to re-refer the draft Policy Statement to Indigenous Governing Bodies and applicable provincial agencies.

Staff do not recommend any meetings about the project after the election campaign period begins on September 19, 2026.

Prepared By: Clare Frater, Director, Trust Area Services

Reviewed By/Date: Rueben Bronee, CAO/July 2, 2026
Executive Committee, July 8, 2026

Agency Referral Responses

- Please note that staff’s recommendations are preliminary and subject to change pending further engagement with Indigenous Governing Bodies and further technical review
- Please note that the responses below are only those where an agency recommended changes. Agency’s that offered only support or that indicated their interests were unaffected were not included
- Where staff found that an agency’s recommendation was clear and would have limited impact on Trust Council’s direction to date, staff have generally not provided comment. Conversely, where an agency’s recommendation would impact Trust Council’s direction to date, staff have provided discussion, but no recommendation.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Introduction	Islands Trust Conservancy (ITC)	That Part 1: Islands Trust Act (page 4) include the following paragraph: “The Islands Trust Conservancy was established by the British Columbia provincial government in 1990 as a regional land trust and the conservation arm of the Islands Trust. The work of the Islands Trust Conservancy Board is guided by the Islands Trust Conservancy Five-year Plan, which is approved by the Minister of Municipal Housing and Affairs under Section 44 of the Islands Trust Act.”	Staff do not recommend that this be added to the Policy Statement, as the Policy Statement does not govern the activities of the ITC. Nonetheless, if Trust Council wishes to action this recommendation, it could add the following as the second to last sentence of opening paragraph of Part 1. <i>The Islands Trust Conservancy was established by the Government of British Columbia in 1990 as the conservation arm of Islands Trust. For the purposes of carrying out the object of the Islands Trust, under a trust fund plan approved by the Minister, the Islands Trust Conservancy is responsible for receiving money and other property and acquiring, holding and, if necessary, disposing of land and other property in the Islands Trust Area.</i>
Guiding Principles	Islands Trust Conservancy (ITC)	A new General Guiding Principle on climate change adaptation and mitigation should be added.	As Trust Council has declared there to be a climate change emergency in the Trust Area it seems appropriate that a principle regarding such should guide its decision making. PRELIMINARY STAFF RECOMMENDATION: Add the following guiding principle to the Trust Council’s Guiding Principles section: Mitigate and Adapt to Climate Change <i>To support planning and land use management decisions that reduce greenhouse gas emissions and enhance the capacity of Trust Area ecosystems and communities to adapt to climate change impacts.</i>
		The importance of protecting a minimum of 30% of the land and water in the Trust Area should appear in an appropriate section in the Policy Statement.	See preliminary staff recommendation above.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
	Lasqueti Island LTC	Addition of new guiding principal related to climate change adaptation and mitigation.	See preliminary staff recommendation above.
	Salt Spring Island LTC	Add a new guiding principle that explicitly addresses climate change, including climate risk, adaptation, mitigation, and long-term community and ecosystem resilience.	See preliminary staff recommendation above.
	Gabriola Island LTC	A new Guiding Principle related to climate change adaptation and mitigation be added;	See preliminary staff recommendation above.
		A new Guiding Principle related to protecting a minimum of 30% of the land and waters in the planning areas of each Local Trust Area	Through the signing of the Kunming-Montreal Global Biodiversity Framework, Canada—along with 195 other countries—committed to protecting 30% of the world's land and oceans by 2030 (Target 3). In 2023, the Government of Canada, BC and the First Nations Leadership Council committed to action rooted in recognition of First Nations title and rights to reach B.C.'s Canada's goal of protecting thirty percent of lands in B.C. by 2030. Given that the Province of BC refers to 'land base' in its materials, staff recommend that any Trust Council target also be about land base rather than 'waters'. Sensitive Ecosystems account for over 40% of the land base of the Islands Trust Area. The current Policy Statement draft suggests that targets and indicators with which Islands Trust Council can monitor and evaluate implementation of the Policy Statement may be included in the Policy Statement Implementation Plan. Staff note that targets may be better suited for inclusion in the Policy Statement itself. Staff are unclear whether this should be principle that informs Trust Council decision making, or a target toward which Trust Council works through implementation of the Policy Statement. Ultimately, there is not reason that it can't be both. There would be a need for meaningful engagement with Indigenous Governing Bodies on inclusion of any target such as this in the draft Policy Statement, and particularly so if the target is to be applied in each local planning area. Should Trust Council wish to strive for a more general target for the Islands Trust Area as a whole it could consider the following wording: Foster Protection of 30 Percent of Land Base Support planning and land use management decisions that contribute to 30% protection of the Islands Trust Area land base in a manner that recognizes Indigenous inherent rights as protected Under Section 35 of the Constitution Act, 1982.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS																																																																																																																								
			If Trust Council wishes to add a draft guiding principle that provides a target for each local planning area it could consider the following wording: Foster Protection of 30 Percent of Land Base Support planning and land use management decisions that contribute to 30% protection of the land base in each local trust area or municipality within the Trust Area in a manner that recognizes Indigenous inherent rights as protected under section 35 of the Constitution Act, 1982, Based on 2017 data: Table 9. Evaluation of conservation priority for each local trust area/island municipality within the Islands Trust Area using factors of need for sensitive, eelgrass and forested ecosystem protection, level of existing protection by area, disturbance threat and selection frequency in Islands Trust Conservancy conservation area modelling. <table><tr><th>Local Trust Area/ Island Municipality</th><th>Need for Sensitive Ecosystem Protection[†]</th><th>Need for Forest Protection[‡]</th><th>Need for Eelgrass Shoreline Protection[§]</th><th>Level of Unprotected Land[¶]</th><th>Disturbance Threat^{**}</th><th>Selection in Islands Trust Conservancy Modelling^{††}</th><th>Priority^{‡‡}</th></tr><tr><td>Ballenas-Winchelsea</td><td>L</td><td>L</td><td>L</td><td>H</td><td>L</td><td>L</td><td>L</td></tr><tr><td>Bowen</td><td>H</td><td>M</td><td>L</td><td>M</td><td>H</td><td>L</td><td>M</td></tr><tr><td>Denman</td><td>M</td><td>M</td><td>M</td><td>L</td><td>M</td><td>M</td><td>M</td></tr><tr><td>Gabriola</td><td>M</td><td>M</td><td>M</td><td>H</td><td>H</td><td>M</td><td>H</td></tr><tr><td>Galiano</td><td>M</td><td>H</td><td>M</td><td>M</td><td>M</td><td>H</td><td>H</td></tr><tr><td>Gambier</td><td>H</td><td>H</td><td>H</td><td>M</td><td>H</td><td>L</td><td>H</td></tr><tr><td>Hornby</td><td>L</td><td>L</td><td>L</td><td>L</td><td>M</td><td>L</td><td>L</td></tr><tr><td>Lasqueti</td><td>H</td><td>H</td><td>M</td><td>H</td><td>M</td><td>H</td><td>VH</td></tr><tr><td>Mayne</td><td>L</td><td>L</td><td>L</td><td>H</td><td>M</td><td>L</td><td>M</td></tr><tr><td>North Pender</td><td>M</td><td>M</td><td>H</td><td>M</td><td>L</td><td>M</td><td>M</td></tr><tr><td>Saturna</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td></tr><tr><td>South Pender</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td><td>L</td></tr><tr><td>Salt Spring</td><td>H</td><td>H</td><td>H</td><td>M</td><td>H</td><td>H</td><td>VH</td></tr><tr><td>Thetis</td><td>H</td><td>M</td><td>H</td><td>H</td><td>H</td><td>M</td><td>VH</td></tr></table> Rankings: L Low M Medium H High VH Very High Note, natural breaks are used to determine the rankings within each category. VH is only used for conservation priority.	Local Trust Area/ Island Municipality	Need for Sensitive Ecosystem Protection [†]	Need for Forest Protection [‡]	Need for Eelgrass Shoreline Protection [§]	Level of Unprotected Land [¶]	Disturbance Threat ^{**}	Selection in Islands Trust Conservancy Modelling ^{††}	Priority ^{‡‡}	Ballenas-Winchelsea	L	L	L	H	L	L	L	Bowen	H	M	L	M	H	L	M	Denman	M	M	M	L	M	M	M	Gabriola	M	M	M	H	H	M	H	Galiano	M	H	M	M	M	H	H	Gambier	H	H	H	M	H	L	H	Hornby	L	L	L	L	M	L	L	Lasqueti	H	H	M	H	M	H	VH	Mayne	L	L	L	H	M	L	M	North Pender	M	M	H	M	L	M	M	Saturna	L	L	L	L	L	L	L	South Pender	L	L	L	L	L	L	L	Salt Spring	H	H	H	M	H	H	VH	Thetis	H	M	H	H	H	M	VH
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			High Biodiversity Area Protection in the Islands Trust Area <table><tr><th>Category</th><th>Percentage</th></tr><tr><td>Protected</td><td>22%</td></tr><tr><td>Not Protected</td><td>78%</td></tr></table> Protected Places in Each Local Trust Area and Bowen Island Municipality as of March 31, 2021 <table><tr><th>Location</th><th>% of land protected</th></tr><tr><td>Ballenas-Winchelsea</td><td>14</td></tr><tr><td>Bowen</td><td>21</td></tr><tr><td>Denman</td><td>24</td></tr><tr><td>Gabriola</td><td>12</td></tr><tr><td>Galiano</td><td>24</td></tr><tr><td>Gambier</td><td>17</td></tr><tr><td>Hornby</td><td>23</td></tr><tr><td>Lasqueti</td><td>12</td></tr><tr><td>Mayne</td><td>8</td></tr><tr><td>North Pender</td><td>19</td></tr><tr><td>Salt Spring</td><td>22</td></tr><tr><td>Saturna</td><td>46</td></tr><tr><td>South Pender</td><td>32</td></tr><tr><td>Thetis</td><td>4</td></tr></table>	Category	Percentage	Protected	22%	Not Protected	78%	Location	% of land protected	Ballenas-Winchelsea	14	Bowen	21	Denman	24	Gabriola	12	Galiano	24	Gambier	17	Hornby	23	Lasqueti	12	Mayne	8	North Pender	19	Salt Spring	22	Saturna	46	South Pender	32	Thetis	4
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PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
	Salt Spring Island LTC	Acknowledge the cumulative impacts of both development and climate change on forest health, and explicitly include ‘forests’ within guiding principle 2.1.6.	If Trust Council wishes to action this recommendation it could consider the following addition to guiding principle 2.1.6: Account for Cumulative Effects <i>To strive to account for the cumulative effects of existing and proposed development to avoid detrimental impacts on watersheds, groundwater supplies, forests, culturally sensitive areas and cultural heritage sites, and species and their habitats.</i>
Reconciliation Principles	Ministry of Housing and Municipal Affairs	<i>Section 1.3 – Indigenous Inherent Rights Acknowledgement</i> - It may be helpful to note that these commitments are intended to guide the ongoing evolution of policies, bylaws, and organizational practices. Highlighting this connection can help readers understand how the principles in this section will inform future work and support continuous improvement over time.	PRELIMINARY STAFF RECOMMENDATION: Revise Section 1.3 – Indigenous Inherent Rights Acknowledgement to read as follows: <i>“Islands Trust Council commits to an ongoing effort to co-develop planning and land use management processes with Indigenous Governing Bodies for policies, bylaws and organizational practices within the Islands Trust Area and acknowledges that this document does not serve as an endpoint.”</i>
		The Trust Council’s Reconciliation Principles are presented differently than the Cooperation Principles that follow, as the Reconciliation Principles are expressed only by reference to external sources. The Trust might benefit from further discussion with relevant Indigenous Governing Bodies to highlight the principles which have the strongest relevance to the purpose and Object of the Trust.	Staff do not recommend further engagement on the principles as the draft Policy Statement has already been referred to Indigenous Governing Bodies, and because Trust Council has previously directly staff to reformat the draft Trust Policy Statement to simplify the structure and shorten the length to improve readability and understanding. Staff do have insights as to which principles IGB’s consider to be of strongest relevance from previous feedback from IGBs.
	Islands Trust Conservancy (ITC)	That the Islands Trust Conservancy considers that policies and principles relating to Trust Council's reconciliation commitments and working towards collaborative governance with Indigenous Governing Bodies [Guiding Principles 2.1.1, 2.1.2, Reconciliation Principles, and Cooperation Principle 2.3.3] are well within the Islands Trust’s mandate, jurisdiction and the interest of Islands Trust Conservancy to advance.	No comment

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
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:	Ministry of Housing and Municipal Affairs (MUNI)	<i>Cooperation Principles</i> currently omits reference to regional districts and improvement districts, despite both being named in the Object of the Trust. Their inclusion would strengthen the policy by recognizing their significance as partners and critical community service providers, and support more integrated and collaborative decision-making across jurisdictions.	PRELIMINARY STAFF RECOMMENDATION: Revise draft Cooperation Principle 2.3.4 to read: Work Towards Strategic Inter-Agency Coordination <i>To work towards establishing effective inter-agency coordination mechanisms with regional districts, improvement districts, the government of British Columbia, and organizations who that play a critical role in advancing the Islands Trust object.</i>
Cooperation Principle 2.3.1 – Collaborate with the Islands Trust Conservancy Board 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.	Islands Trust Conservancy (ITC)	That section 2.3.1 - Cooperation Principles (page 10) be revised as suggested: "To collaborate closely with the Islands Trust Conservancy Board, and be informed by, local Indigenous knowledge, science-based conservation planning, ecosystem mapping, identification of core conservation areas, protected area networks, and protection of species and ecosystems at risk, including critical habitat."	Staff do not recommend that Section 2.3.1 be amended as proposed. Section 2.1.7 already sets out the sources of information to which Trust Council should look to inform its decisions, including Indigenous Knowledge. If Trust Council wishes to consider a revised version of principle 2.3.1 based on this recommendation, staff suggest the following: 2.3.1 Collaborate with the Islands Trust Conservancy Board 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 and their critical habitat.
Cooperation Principle 2.3.2 – Collaborate with Island Municipalities 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.	Capital Regional District (staff)	Consider reviewing verbiage relating to different governing structures of regions under the islands trust. E.g. “2.3.2 Collaborate with Island Municipalities” – not all islands are municipalities (Salt Spring Island)	This comment seems to misunderstand that “island municipalities” has a specific meaning in the Trust context.
	Ministry of Housing and Municipal Affairs (MUNI)	cites the Policy Statement itself as a document for collaboration with Island Municipalities. While such collaboration is essential for successful implementation, it will have occurred prior to publication. Referencing collaboration in this way within the Policy Statement may therefore be confusing.	PRELIMINARY STAFF RECOMMENDATION: Revise draft principle 2.3.2 to read: <i>“To collaborate with island municipalities, particularly in the areas of conservation planning, communications and engagement, the Policy Statement amendments, and other areas supporting the Islands Trust Object.”</i>
	Bowen Island Municipality	Clarity is also sought in regards to Policy 2.3.4 with regards to how “that	As an advisory policy, BIM is not required to action this policy.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Cooperation Principle 2.3.4 – 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.		could be inconsistent with the object of the trust” is to be interpreted	“ . . . <i>inconsistent with the object of the trust</i> ” is an interpretation of the local trust committee/island municipality and subsequently by Executive Committee/Trust Council.
	Capital Regional District (Board)	Regarding policy 2.3.4. add "and policies" at the end of the statement	Staff suggest that this is addressed in proposed amendments above for cooperation principle 2.3.4.
Directive Policy 3.1.1 – Engage with Indigenous Governing Bodies Engage with Indigenous Governing Bodies and provide a record of the engagement at time of bylaw submission	Ministry of Housing and Municipal Affairs	currently directs Local Trust Committees (LTCs) to “engage with Indigenous Governing Bodies and provide a record of engagement at time of bylaw submission.” The Trust may wish to clarify whether this is meant to reference bylaw submission to the Executive Committee/Trust Council, the minister responsible for the <i>Islands Trust Act</i>, or both, after the words “bylaw submission.” There is also an opportunity to enhance this directive by clarifying the scope of engagement and reinforcing expectations for transparency, accountability and building the needed relationships. Specifically, the policy could be <i>revised</i> to direct LTCs to engage with Indigenous Governing Bodies whose rights and interests may be affected by proposed bylaw changes early and often, as required. Additionally, the term “record of engagement” could be more clearly defined as a summary of the engagement process, including details such as who was contacted, the methods of engagement used, key concerns raised, and how those concerns were addressed.	The engagement log used by local trust committees/island municipalities for provision to Executive Committee should be consistent with that required by the minister responsible for the Islands Trust Act. Staff consider that clarifying the scope of engagement and reinforcing expectations for transparency, accountability and building the needed relationships with Indigenous Governing Bodies would be addressed outside of the Policy Statement, in either a Trust Council policy or an internal operational procedure. As above, the details of how Islands Trust engages Indigenous Governing Bodies would be addressed outside of the Policy Statement, in either a Trust Council policy or an internal operational document. Revise draft directive policy 3.1.1 to read: PRELIMINARY STAFF RECOMMENDATION: <i>“Engage early and often with Indigenous Governing Bodies, whose rights and interests may be affected by proposed bylaw changes and provide a record of engagement, including a summary of the engagement process, details such as who was contacted, the methods of engagement used, key concerns raised, and how those concerns were addressed, at time of bylaw submission to Islands Trust Executive Committee.”</i> Trust Council should consider this advice as it develops the Policy Statement Implementation Plan and its Strategic Plan.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
		As engagement with Indigenous Governing Bodies is an emerging and evolving practice and imperative since the last Trust Policy Statement was adopted, it will be important for the Islands Trust to devote additional attention to implementation planning. Proactive planning will help ensure that the Trust's processes, expectations, and relationships continue to develop in a manner that reflects the evolving nature of this policy area and supports meaningful, effective engagement over time.	
Advisory Policy 3.1.3 – Land Back Through engagement with Indigenous Governing Bodies, support opportunities to direct land to Indigenous Governing Bodies, including, but not limited to, as amenity contributions in applications seeking additional development potential.	Bowen Island Municipality	where BIM gets amenities, it should be for the use of BIM.	As an advisory policy, BIM is not required to action this policy. However, BIM may wish to consider if there are circumstances where it would consider land contributed to an Indigenous Governing Body to be satisfactory as a community amenity.
	Gabriola Island LTC	Advisory policy 3.1.3 (Land Back) to clarify or better define amenity contributions	Revise draft advisory policy 3.1.3 to read as follows: Land Back <i>Through engagement with Indigenous Governing Bodies and land owners, support opportunities to direct land to Indigenous Governing Bodies for:</i> <i>the voluntary return of land to Indigenous Governing Bodies, including, but not limited to, as amenity contributions in applications seeking additional development potential; and</i> <i>the voluntary provision of access to private and public lands for Indigenous stewardship and cultural practices</i>
	Lasqueti Island LTC	Amendment of Advisory Policy 3.1.3, 'Land Back,' to make it explicit that the intent is to encourage support of voluntary opportunities to direct land to Indigenous Governing Bodies, not to require.	As above.
Advisory Policy 3.1.4 – Information Sharing Support and develop methods for regular and timely sharing of information with Indigenous Governing Bodies.	Bowen Island Municipality	has operational issues, and it should clarified what information is being shared	As an advisory policy, BIM is not required to action this policy. The type of information implied by the policy is any information held by Islands Trust that may be of interest or use to Indigenous Governing Bodies – thinking specifically here of mapping, ecosystem, or cultural heritage data.
Advisory Policy 3.1.5 – Respect Indigenous Protocols for Information and Data Provided	Bowen Island Municipality	should be clarified to ensure that any proponent of development have a clear	As an advisory policy, BIM is not required to action this policy. While applicants can expect some explanation for political decisions, that should not come at the expense of revealing information that must be kept in confidence for legal or cultural reasons.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Respect Indigenous Governing Bodies' and Indigenous Knowledge Holders' protocols about how their data and information should be collected, protected, used and shared.		understanding of why a decision is being made	
Directive Policies- Indigenous Cultural Heritage & Culturally Significant Areas, Sites and Species 3.2.1 – Indigenous Cultural Heritage Sites 3.2.2 – Indigenous Marine Harvesting Areas 3.2.3 – Indigenous Harvesting and Hunting Areas 3.2.4 – Indigenous Cultural Heritage Sites 3.2.5 – Indigenous Harvesting Areas 3.2.6 – Indigenous Harvesting and Hunting Area Access 3.2.7 – Other Culturally Significant Areas for Indigenous Peoples 3.2.8 –Culturally Significant Species and Medicinal Plants 3.2.9 –Cultural Monitors	Bowen Island Municipality	BIM has issues with Part 3, Goal 2, and wishes that some emphasis be put on the community's culture and heritage as opposed to solely indigenous culture and heritage BIM has concerns with policies 3.2.5 and 3.2.6 and the potential of hunting and trapping on Bowen Island; BIM has a use of bows bylaw designed to limit the issues around hunters coming to the island Policy 3.2.9 could also be clarified as this seems to be more of an operational nature to be developed locally as a policy or Development Permit Area Finally, it is unclear how jurisdictional issues have been addressed, as policies addressing marine harvesting, clam gardens, fish weirs, and fishing may fall entirely in federal jurisdiction	Goal 4, directive Policy 3.4.8 addresses community heritage As advisory policies, BIM is not required to action them. As an advisory policy, BIM is not required to action this policy. It is correct that this is more of an operational/relational policy. The draft Policy Statement has been referred to federal and provincial agencies for review and comment. Also, local governing planning authority, under Part 14 of the Local Government Act, can directly impact marine harvesting areas through siting of marinas, docks, and upland uses that risk contamination of harvesting areas.
Goal 3: Preserve and Protect Healthy and Biodiverse Ecosystems	Islands Trust Conservancy (ITC)	That Goal 3 introduction paragraph include "the health of natural ecosystems" as a high priority.	Although it would add some duplication to the document, should Trust Council wish to respond to this recommendation it could reflect the language in guiding principle 2.1.2 in the Goal 3 introductory paragraph as follows: Goal 3: Preserve and Protect Healthy and Biodiverse Ecosystems 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. Trust Council will be guided by guiding principle 2.1.2 to place priority on preserving, protecting and restoring the environment, and preserving, protecting, and supporting restoration of Indigenous cultural heritage in all decision making. The policies in this section aim to identify and protect key ecosystem types and characteristics that safeguard biodiversity and promote resilience to climate change. Should Trust Council make this change, for consistency it should also add the new sentence to the introductory paragraph for Goal 2 as the third sentence.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
	Salt Spring Island LTC	Strengthen and articulate the interdependencies among Goals 3, 4, and 5, particularly with respect to environmental protection, but also consider reconciliation, climate resilience, and long-term sustainability.	If Trust Council wishes to action this recommendation it could consider adding the following new paragraph under Part 3: Goals and Policies heading that reads: <i>“Trust Council acknowledges that the goals set out in this Policy Statement cannot be met in isolation from one another and that achieving any of them is interdependent on all of them”</i>
		Expand the goal (Goal 3 – Preserve and Protect Healthy, Biodiverse Ecosystems) and associated policies to move beyond identification and protection alone, and include ecosystem restoration and enhancement, while accounting for current and future climate change impacts.	Restoration is already included in most of the directive policies under Goal 3. Also, examples of an LTC being involved in the restoration of ecosystems is negligible. LTCs and zone for use, density, size and siting. Opportunities to require ecosystem restoration could be negotiated during a rezoning process if there are appropriate supporting policies, or could be required within certain development permit areas to compensate for ecosystem damage resulting from the authorized development. Beyond that, active restoration is largely outside of direct LTC jurisdiction. Island municipalities may have a more active role in restoration through their ownership of public land. However, if Trust Council wishes to action this recommendation, it could consider the following amendments to the preamble of Goal 3: Goal 3: Preserve, and Protect and Restore the Healthy and Biodiverseity of Ecosystems <i>Islands Trust Council acknowledges that preserving and protecting and restoring 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 and promote resilience to climate change.</i> If Trust Council wants to strengthen ecosystem protection through the Policy Statement, it could also consider: • Revising its ecosystem protection draft directive policies to be more prescriptive, such as: Critical Habitat for Species at Risk <i>Identify and prioritize the preservation, protection, and restoration of and establish development permit areas to preserve, protect and restore critical habitat for species at risk</i> Or: • Trust Council could request staff to provide a report with options for a directive policy • regarding ecological offsetting or no-net-loss for development applications that seek to increase development potential.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Directive Policy 3.3.1 – Protected Area Networks Identify, establish, and sustain a network of protected areas of sufficient size and distribution to preserve the environmental integrity of ecosystems in their planning area.	Bowen Island Municipality	BIM also seeks clarity on how Policy 3.3.11 differs from the Goal 2 policies, if there is no substantial difference, this could be struck to avoid unnecessary repetition	Indigenous Protected and Conserved Areas can help achieve, but are different from, the policies in Goal 2. Information about Indigenous Protected and Conserved Areas is available here .
Directive Policy 3.3.4 – Coastal Oak and Prairie Ecosystems Identify and prioritize the preservation and protection of coastal oak and prairie ecosystems, with a particular focus on the maintenance, restoration and management of their ecological integrity.	Bowen Island Municipality	could be clarified to explicitly state that Garry Oak is the species being considered for protection	Revise draft directive policy 3.3.4 to read as follows: Coastal (Garry) Oak and Prairie Ecosystems Identify and prioritize the preservation and protection of coastal (Garry) oak and prairie ecosystems, with a particular focus on the maintenance, restoration and management of their ecological integrity.
Directive Policy 3.3.6 – Marine Shorelines and Nearshore Areas	Salt Spring Island LTC	In Policy 3.3.6 – Marine and Coastal Ecosystems, recognize that the Trust Area’s more than 1,300 km of marine shoreline and nearshore environments include a broader range of ecosystems than those listed. Introduce the list with the phrase “including, but not limited to” to ensure comprehensive protection.	The intention of the policy as drafted is to direct focus to sensitive marine ecosystems whose protection should be prioritized. Nonetheless, if Trust Council wishes to pursue this amendment it would be phrased as follows: Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection and restoration of marine shorelines and nearshore areas, including, but not limited to, eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands</i>
Directive Policy 3.3.8 – Islets and Small Islands Identify and prioritize the preservation, protection, and restoration of islets and small islands.	Bowen Island Municipality	has a lack of clarity as to how a small island is defined or if they are the smaller islands in a Trust Area relative to the main island	Some specificity may be helpful here. Trust Council could ask staff to do some analysis and provide advice in this regard.
Directive Policy 3.3.9 – Light Pollution Minimize light pollution through the application of dark sky principles.	Bowen Island Municipality	could benefit from better precision as to whether this refers to Island Trust’s policies and guidelines or those principles set by the International Dark-Sky Association	This directive policy was meant to refer to the Five Lighting Principles for Responsible Outdoor Lighting set out by DarkSky International. Staff do not recommend referencing external sources in the Policy Statement, as such Trust Council could add a glossary definition that summarizes the dark sky principles. PRELIMINARY STAFF RECOMMENDATION: Add a new definition to the glossary of terms to read as follows: Dark sky principles means the following principles for responsible outdoor lighting: 1) <i>Useful – Use light only if it is needed</i> 2) <i>Targeted – Direct light so it falls only where it is needed</i> 3) <i>Low Level – Light should be no brighter than necessary</i> 4) <i>Controlled – Use light only when it is needed</i>

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS																														
			5) Warm-coloured – Use warmer color lights where possible																														
Directive Policy 3.4.1 – Sustainable Development 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.	Islands Trust Conservancy (ITC)	That Directive Policy 3.4.1 include consideration of the ecological integrity of each island and the ability of the natural ecosystems to support particular developments.	Prior to consideration of adding a requirement for local trust committees and island municipalities to consider the ecological integrity of an island when determining appropriate locations and intensities of various uses of the land Trust Council would need to agree on a definition of ecological integrity. Trust Council would also need to discuss how ecological integrity would be assessed and measured, and seek guidance from Indigenous Governing Bodies on the approach. In 2017, through disturbance mapping, the change in the natural landscape was analyzed over a ten year period from 2004-2014. In that analysis, it was estimated that approximately 1,070 ha of land were disturbed or lost through deforestation, vegetation clearing, creation of rural developments and roads, wetland loss, and disturbance to soils. It would benefit Islands Trust Council to contract analysis to identify trends between 2014-2024. Table 6. Land disturbance type in the Islands Trust Area between 2004 and 2014 by area and percent (Madrone, 2017). <table><tr><th>Disturbance Type</th><th>Area (ha)</th><th>Portion of Islands Trust Area (%)</th></tr><tr><td>Deforestation – forestry</td><td>401.2</td><td>0.50</td></tr><tr><td>Deforestation – rural development & roads</td><td>590.0</td><td>0.74</td></tr><tr><td>Deforestation – other</td><td>2.4</td><td><0.01</td></tr><tr><td>Cleared Vegetation – rural development & roads</td><td>5.4</td><td>0.01</td></tr><tr><td>Cleared Vegetation – other</td><td>11.9</td><td>0.01</td></tr><tr><td>New Roads/Buildings in non-vegetated areas</td><td>49.9</td><td>0.06</td></tr><tr><td>Wetland Loss</td><td>2.6</td><td><0.01</td></tr><tr><td>Soil disturbance</td><td>6.6</td><td>0.01</td></tr><tr><td>TOTAL Disturbed Area</td><td>1,069.9</td><td>1.35</td></tr></table> In 2017, using data from 2014, the Islands Trust Conservancy also assessed the amount of land converted to human use in each local trust area/Bowen Island. It is worth noting that the 30-40% threshold figure is generally used for continents and small islands may cross biodiversity thresholds earlier and more abruptly than larger or mainland systems.	Disturbance Type	Area (ha)	Portion of Islands Trust Area (%)	Deforestation – forestry	401.2	0.50	Deforestation – rural development & roads	590.0	0.74	Deforestation – other	2.4	<0.01	Cleared Vegetation – rural development & roads	5.4	0.01	Cleared Vegetation – other	11.9	0.01	New Roads/Buildings in non-vegetated areas	49.9	0.06	Wetland Loss	2.6	<0.01	Soil disturbance	6.6	0.01	TOTAL Disturbed Area	1,069.9	1.35
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PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
			Land Converted to Human Use in the Islands Trust Area 50 40 30 20 10 0 PERCENTAGE ACCEPTED THRESHOLD FOR ECOSYSTEM HEALTH Bowen Denman Executive Gabriola Galiano Cambier Hornby Lasqueti Mayne North Pender Salt Spring Saturna South Pender Thetis Once land is converted for human use, that land is less available for nature. As land conversion reaches or goes above a 30-40% threshold, the number of species in a given habitat decline more rapidly.
Directive Policy 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.	BC Ferries	The nature of ferry service requires us to develop within areas subject to sea-level rise, erosion and slope instability. The risks of development within these areas will be managed through engineered designs that aim to protect the local environment and limit disruption via service cancellations. We recommend broadening the language to allow for risk to hazardous areas to be mitigated through appropriate design measures.	Potential approaches to addressing BC Ferries’ comment are as follows: - Do not make revisions in response to the comment. The proposed definition of “restrict” in the draft Policy Statement is “to confine, bound or limit, not necessarily prohibit.” BC Ferries would simply face the same restrictions as any other land owner in an identified climate risk area and would apply for the same types of permits required of any other, such as variance permits to reduce a setback, if that is how the subject LTC/IM chose to implement this directive, or a development permit, if that was the path chosen. - Revise 3.4.6 to read: Hazardous Areas “Identify areas at elevated risk of natural and climate change-related hazards and restrict residential, commercial and industrial development within these areas including, but not limited to, areas subject to flooding, sea-level rise, erosion, slope instability and wildfire.” (This approach would enable could enable institutional development such as ferry terminals to proceed, an approach consistent with the <i>Riparian Areas Protection Regulation</i>)

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
			Revise the definition of “restrict” as it appears in the Policy Statement glossary to acknowledge that there may be feasible engineering solutions. However, one engineering solution to a wildfire risk area is to cut down all the trees, which would likely be inconsistent with the Islands Trust object.
	Ministry of Housing and Municipal Affairs	The identification of hazardous areas to guide land use decisions is essential to protecting public safety and ensuring sustainable development. The Trust might consider expanding on this by adding language about working with regional districts and municipalities on disaster mitigation and risk reduction, which reflects their roles and responsibilities under the <i>Emergency Management and Disaster Act</i> .	Staff do not recommend any revisions on the basis of this comment. Directives in the Policy Statement are about the expected content of LTC/IM bylaws, not the process of how they create those bylaws. Implementation of this policy would be achieved <i>either</i> by agreements with regional districts detailing meeting frequency, purpose and information-sharing, <i>or</i> by individual LTC’s reaching out to regional districts at the time of major OCP updates. If Trust Council is looking to amend this policy in accordance with MUNI’s suggestion, it could be done as follows: 3.4.6 Hazardous Areas <i>Collaborate with regional districts and municipalities to 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> The effect of adding this additional requirement to the directive is that upon receiving a local bylaw for assessment of whether it is contract or at variance the Policy Statement, Executive Committee will have to assess whether the LTC/IM has demonstrated sufficient collaboration with regional districts. As part of implementation planning there would need to be consideration of whether a regional district engagement record would need to be provided to Executive Committee at time of bylaw submission.
	Salt Spring Island Local Trust Committee	Strengthen Policy 3.4.6 – Climate and Natural Hazard Risks to be more anticipatory and future-focused, emphasizing risk avoidance rather than reliance on adaptation alone, and restricting development in areas subject to present and projected climate-related hazards.	
	Bowen Island Municipality	Policy 3.4.6 could benefit from further clarification of what “restrict development” means	“Restrict” is defined in the glossary of terms: “ <i>To confine, bound or limit, not necessarily prohibit.</i> ”
Directive Policy 3.4.7 – Economic Activities	Bowen Island Municipality	It is unclear why the wording in Policy 3.4.10 is different than the wording in Policy 3.4.7 as the more general	This was a specific request of at least one Indigenous Governing Body that reviewed the previous draft Policy Statement.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Support sustainable economic activities that are compatible with the preservation and protection of the Trust Area and its unique amenities, environment, community well-being, and that consider transportation and infrastructure capacity.		language of Policy 3.4.7 should cover Indigenous communities	
Advisory Policy 3.4.9 – Existing Development Potential Identify land where current zoning or other land use regulations allow development that could be inconsistent with the object of the trust, and consider policy and/or regulatory options to reduce development potential or minimize the impacts of future development.	Capital Regional District (Board)	That the policy statement makes more explicit the essential role of draft policy 3.4.9. <i>Existing Development Potential</i> in reducing the potential for subdivision and development in more isolated and rural areas of the Islands, thereby enabling the redirection of future development away from those areas and towards existing/urban areas. We also recommend that this policy be made a directive policy.	As suggested by CRD Board, staff recommend that this be made a directive policy. Doing so would require LTCs/IMs, at the time of major OCP/LUB updates, to reduce the permitted density in areas of their islands where existing development potential is inconsistent with the Islands Trust object, or implement land use regulations or permitting requirements that reduce the potential impact of that existing development potential. <u>Alternatives</u> Trust Council could simply require LTCs to reduce development potential in those identified areas, not allowing for regulatory or policy approaches to “minimize the impacts of future development” as follows: Reduce Land Use Impacts in Rural Areas <i>Identify land where current zoning allows a density of development that could be inconsistent with the object of the trust and consider reduce the permitted density in those areas.</i> Trust Council could also instead consider a new policy in the Managing Growth and Development section requiring LTCs/IMs to implement a density transfer policy to accommodate the reduction of zoned development potential in areas where it is determined to be inconsistent with the object of the trust, to areas of the island where it is more desirable. Density Transfer <i>Identify land where current zoning allows a density of development that could be inconsistent with the object of the trust and implement a policy to guide the transfer of density to more suitable locations.</i> Preliminary Staff Recommendation: Change advisory policy 3.4.9 into a directive policy in the Managing Growth and Development section and revise as follows: Reduce Land Use Impacts in Rural Areas Identify land where current zoning or other land uses regulations allow land use or density that could be inconsistent with the object of the trust, and consider implement policyies and/or regulatory ions options to reduce development potential or minimize the impacts of future development.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
	Ministry of Housing and Municipal Affairs	The Object and the tools provided to the Islands Trust require thoughtfully balancing between the preservation and protection of the Trust Area and existing land use entitlements. During implementation of this advisory policy and identification of land where current zoning may permit development inconsistent with the preserve and protect mandate, any calculation of potential housing supply should not be reliant on the identified lands	This comment appears to reiterate what the advisory policy says, which is that LTCs/IMs should not increase residential density in areas where doing so would be inconsistent with the object of the Trust. See preliminary staff recommendation above.
	Bowen Island Municipality	Clarity is also sought in regards to Policy 3.4.9 with regards to how “that could be inconsistent with the object of the trust” is to be interpreted.	Trust Council can consider whether it wishes to amend this advisory policy to be more specific and could request further staff advice. Potential options include: <i>“Identify land where current zoning or other land use regulations allow development that could be contrary to goals 2 and 3 of this Policy Statement inconsistent with the object of the trust, and consider policy and/or regulatory options to reduce development potential or minimize the impacts of future development”</i> Or <i>“Identify land of high ecological and/or cultural significance where current zoning or other land use regulations allow development that could be detrimental to those values be inconsistent with the object of the trust, and consider policy and/or regulatory options to reduce development potential or minimize the impacts of future development”</i>
Advisory Policy 3.4.10 – Economic Development Opportunities for Indigenous Communities Through engagement with Indigenous Governing Bodies, support economic development opportunities for Indigenous communities.	Bowen Island Municipality	It is unclear why the wording in Policy 3.4.10 is different than the wording in Policy 3.4.7 as the more general language of Policy 3.4.7 should cover Indigenous communities	This was a specific request of at least one Indigenous Governing Body that reviewed the previous draft Policy Statement.
Directive Policy 3.4.11 – Suitable Locations for Additional Housing Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable housing. Directive Policy 3.4.12 – Housing Diversity Support a range of housing types and tenures to help meet the identified housing	Capital Regional District (Board)	Regarding policy 3.4.11. add the words "including affordable housing" to the end of the statement.	Staff recommend removing the term attainable housing from the draft Policy Statement and instead revise directive policy 3.4.11 as in the absence of a commonly-used definition of attainable housing. Revise draft directive policy 3.4.11 to read as follows: PRELIMINARY STAFF RECOMMENDATION: Suitable Locations for Additional Housing <i>Identify suitable locations that could support increased density for the development of housing that helps meet the identified needs of the island community and local Indigenous communities. safe, secure, diverse and both attainable and affordable housing.</i>

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
needs of the island community and local Indigenous communities.			
Directive Policy 3.4.13 – Clustered Small Dwelling Units Support alternatives to conventional single-detached dwellings by establishing policies to permit clusters of small dwelling units in suitable areas.	Bowen Island Municipality	Policy 3.4.11 should define 'attainable' to ensure consistent interpretation and application	See above.
Directive Policy 3.4.14 –Floor Area and Lot Coverage Limits Set floor area and lot coverage limits for residential development to minimize negative environmental impacts, including on land used for agricultural purposes.	Agricultural Land Commission (ALC)	Policy 3.4.11, 3.4.12, 3.4.13, 3.4.16 and 3.4.18 – it is unclear if these policies are intended to apply to land in the Agricultural Land Reserve (ALR). ALC staff recommend clarifying where these policies apply as the ALCA and ALR Use Regulation restrict residential uses in the ALR. A parcel in the ALR is permitted up to three residential units: a principal residence up to 500 m2 total floor area, a secondary suite within that principal residence, an additional residence up to 90 m2 total floor area for parcels 40 ha or less, or up to 186 m2 for parcels larger than 40 ha). Local governments cannot permit more housing on an ALR parcel than what is permitted by the ALCA and ALR Use regulation	These policies are not meant to apply in the ALR. All planning staff are well aware of the requirement to comply with the ALC Act and regulations. They would convey this to LTCs/IMs as they make their planning and land use management decisions. Staff do not believe that we need to specify where these policies would not apply (ALR, parks, covenant areas, IGB reserves), as it is already well understood.
Directive Policy 3.4.15 –Affordable and Special Needs Housing 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.			
Directive Policy 3.4.16 –Short-Term Rentals 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.	Ministry of Housing and Municipal Affairs (MUNI)	It may be helpful to define what 'attainable housing' means in this context. Including specific details of where these locations may be (where applicable and depending on size/population of each island) with consideration toward complete communities that include homes closer to shops and services (as available), and/or where active transportation options (and even some transit) are available	See preliminary staff recommendation above re draft directive policy 3.4.11 recommending deletion of the term "attainable housing". Staff agree that MUNI's suggestions about suitable locations reflect conventional land use planning principles, however Trust Council by resolution earlier removed this directive from the Policy Statement: Sustainable Development <i>Ensure development is compact, energy-efficient, and appropriately situated on the island and on the site in order to:</i> •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. and replaced it with this: Sustainable Development
Directive Policy 3.4.17 –Housing for Indigenous People Through engagement with Indigenous Governing Bodies, support housing opportunities for Indigenous people in the Islands Trust Area.			

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Directive Policy 3.4.18 –Multi-Unit Residential Implement land use regulations for affordable and special needs housing and other multi-unit residential development that permit a range of potential site configurations, and control form and character through development permit areas.			<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 on the land</i>
	Lasqueti Island LTC	Amendment of Directive Policy 3.4.14 by removing the words 'Floor area' from the heading and text, and both instances of the words 'floor area' from the glossary.	This recommendation from LA LTC may misunderstand a concern that has arisen from some island residents about use of “floor area ratio” as a measure of intensity of use, rather than using floor area as a tool to limit house sizes and therefore reduce potential impacts to the land. “Floor area” as used in directive 3.4.14 is appropriate, as limiting the size of dwelling units is a potential tool to limit environmental impacts. Staff recommend that “floor area ratio” be removed from the glossary, as it simply isn’t a useful planning tool to manage the intensity of development in a rural context. If Trust Council decides to make this change, the glossary definition for “Land Use Density and Intensity” could use further refinement. Trust Council could request staff advice on this topic. PRELIMINARY STAFF RECOMMENDATION: Remove “floor area ratio” from the definition of land use density and intensity in the glossary.
	Ministry of Housing and Municipal Affairs (MUNI)	Consider expanding these policies to ensure references to all seven types of housing need required in housing needs reports are included (where applicable and depending on size/population of each island): 1) Affordable housing 2) Rental housing 3) Special needs housing 4) Seniors’ housing 5) Family housing 6) Shelters for individuals experiencing homelessness and housing for individuals at risk of homelessness 7) Housing near transportation infrastructure that supports walking, bicycling, public transit or other alternative forms of transportation	Staff do not recommend making this change. Under Section 473.1 of the Local Government Act, local trust committees are exempt from the requirement that OCPs must allow for the anticipated 20-year housing needs of the community. Islands Trust was also left out of the Province’s small-scale, multi-unit housing legislation (Bill 44). The current phrasing of draft directive policy 3.4.12 leaves sufficient latitude for LTCs to take positive steps toward addressing an island’s housing challenges, without setting up an expectation that they must meet <i>all</i> housing demand. Additionally, not all the types of housing listed below are available/needed on every island. For larger islands, MUNI’s advice should be considered when developing official community plans and land use bylaws. If Trust Council wishes to action MUNI’s recommendation, it could amend directive policy 3.4.12 as follows: 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, such as:</i> <i>1) Affordable housing</i> <i>2) Rental housing</i> <i>3) Special needs housing</i>

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			4) Seniors' housing 5) Family housing 6) Shelters for individuals experiencing homelessness and housing for individuals at risk of homelessness 7) Housing near transportation infrastructure that supports walking, bicycling, public transit or other alternative forms of transportation
	Bowen Island Municipality	It is unclear why Policy 3.4.14 uses floor area rather than lot coverage if the purpose is for environmental protection	Directive policy 3.4.14 requires both floor area and lot coverage limits. Both can play a role in reducing land use impacts. Trust Council may wish to consider whether it wishes to remove the directive that LTCs/IMs implement floor area limits.
		Policy 3.4.16 creates concerns for BIM as BIM has opted into provincial regulations for Short-Term Rentals and it is unclear how this proposed policy interacts with provincial policy	Staff suggest that Executive Committee would likely consider it sufficient that Bowen Island Municipality simply state that short-term rentals on that island are regulated in accordance with the Provincial rules. If Trust Council wishes to amend this directive in accordance with BIM's concern, it could consider the following wording: <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, or opt in to the Provincial government regulatory framework.</i> Conversely, if Trust Council wishes to ensure that all short-term rentals in the Islands Trust Area are regulated in alignment with the Province's framework, it could amend this directive policy as follows: <i>"Ensure that short-term rental of residential units is only permitted if the subject property is the host's principal residence."</i>
		Policy 3.4.17 repeats Policy 3.4.12	While similar, these are slightly different policies, with advisory policy 3.4.17 focusing on the requirement to engage with Indigenous Governing Bodies on the topic.
Advisory Policy 3.4.19 – Natural Building Materials and Techniques Encourage construction of buildings and structures using local natural building materials and techniques, and minimize barriers to their use.	Ministry of Housing and Municipal Affairs	It may be useful to include the coordination required with regional districts regarding building permitting and inspection in the Islands Trust Area. Even if explicitly addressed in the policies, this could also require implementation planning with other agencies to achieve the intended policy outcomes.	Ministry staff labelled 3.4.19 as a directive policy but it is an advisory policy, If Trust Council wishes to ensure that it is not encouraging the development of unsafe buildings, it could make the following amendment. 3.4.19 Natural Building Materials and Techniques Encourage construction of <i>building code-compliant</i> buildings and structures using local natural building materials and techniques, and <i>collaborate with regulators to minimize barriers to their use.</i>

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	Bowen Island Municipality	It is unclear whether Policy 3.4.19 is compatible with FireSmart principles	As an advisory Policy, BIM is not required to action this policy
Directive Policy 3.4.20 – Public and Active Transportation Networks 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.	Bowen Island Municipality	Policy 3.4.20 raises issues on whether it is within the mandate of the Islands Trust or LTCs to “establish” transportation networks	Staff agree the language should be revised. PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.4.20 to read as follows: <i>“Identify and establish support the establishment of appropriately-situated, safe, comfortable, and equitable transportation networks that reduce dependency on private automobile use, encourage zero emission modes of transportation, and support encourage increased use of trail systems, public transportation, and active transportation.”</i>
Directive Policy 3.4.21 – Rural Roadways Identify and protect rural roadways, including scenic and/or heritage roads.	Ministry of Housing and Municipal Affairs	could be strengthened by clarifying its underlying intent or providing definitions of what constitutes rural, scenic, or heritage roadways, and by including the role of the Ministry of Transportation and Transit in this regard. This additional detail would help ensure consistent interpretation and implementation.	This directive policy <i>does</i> require amendment, as all roadways in the Trust Area are considered rural roads (major/main/minor/residential) under the existing Trust Council agreement with the Ministry of Transportation and Transit (MOTT), and it is the MOTT’s standard that should be identified in an OCP map. Thus, staff recommend that it be broken into two directive policies. Staff concur that it could be helpful to define these terms in the glossary. However, current agreement with MOTT says Islands Trust will prepare proposals for scenic/heritage road designation and present those to MOTT for negotiation of unique standards. But the agreement does not define what those terms mean. Nonetheless, Trust Council could draw on the recommended definitions here which were developed using material from the MOTT agreement. PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.4.21 to read as follows: 3.4.21 Rural Roadways <i>Identify the road standard designation of the island’s road transportation network and preserve the rural character of island roads.</i> Add new directive policy in the Transportation section that reads as follows: 3.4.22 Scenic and Heritage Roadways <i>Identify and protect scenic and heritage roadways.</i> Add the following definitions: Scenic roadway <i>means a road, or portion of a road, so designated through consultation between Islands Trust and the ministry responsible for highways, or in the case of island</i>

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			<i>municipalities, by their own declaration, because of its scenic value and requiring special policies to maintain those values.</i> Heritage roadway means a road, or portion of a road, so designated through consultation between Islands Trust and the ministry responsible for highways, or in the case of island municipalities, by their own declaration, because of its heritage value and requiring special policies to maintain those values.
	Bowen Island Municipality	BIM also seeks a definition of “rural roadway” as mentioned in Policy 3.4.21	See preliminary staff recommendation above.
Advisory Policy 3.4.22 – Road Systems Ensure that road location, design, construction, and road systems are compatible with the preservation and protection of the Trust Area and its unique amenities and environment.	Bowen Island Municipality	It is also unclear whether Policy 3.4.22 is within the authority of the Islands Trust or of LTCs	Most new roads in the Islands Trust Area are developed as part of new subdivisions. While they must be built to Ministry of Transportation and Transit construction standards, local trust committee subdivision regulations play a significant role in where/how these new roads are developed, recognizing that the Province may overrule local regulations in its final subdivision approval if it is deemed in the Provincial interest to do so.
Directive Policy 3.4.26 – Wastewater Disposal Systems 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.		Jurisdictional issues also arise for Policy 3.4.26 as it is unclear where Health Authorities fit in with this policy	Staff anticipate that Trust Council has proposed this regulation as it finds that Health Authority guidelines are insufficient to protect the cited values. Local regulations can exceed those required by health authorities. Regardless, staff do recommend a minor revision. If Trust Council does not wish to overlap this area of Provincial/health authority jurisdiction, it can remove 3.4.26 from the draft policy statement. PRELIMINARY STAFF RECOMMENDATION: Revise directive policy 3.4.26 to read as follows: 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 protecting Indigenous Peoples’ cultural heritage sites and marine harvesting areas.</i>
Directive Policy 3.4.31 –Trail Systems Identify appropriate locations for, types of, 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.	Bowen Island Municipality	could benefit from the inclusion of active transportation as well as active recreation	Staff concur with this recommendation. PRELIMINARY STAFF RECOMMENDATION: Revise directive policy 3.4.31 to read as follows: 3.4.31 – Trail Systems <i>Identify appropriate locations for, types of, and safe public access to, public pedestrian, equestrian and bicycle trail systems to support active recreation and active transportation that is compatible with preservation and protection of the Trust Area and its unique amenities and environment.</i>

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Goal 4: Foster Sustainable, Inclusive, and Resilient Communities	Gabriola Island LTC	Stronger language in Goal Four about the purpose being limiting negative impact to the natural environment.	If Trust Council wishes to action this recommendation it could amend the last sentence of the preamble of Goal 4 to read: <i>“The policies in this section support the preservation and protection of unique island character and aim to foster sustainable, inclusive, rural and resilient communities while protecting the natural environment.”</i>
	Salt Spring Island LTC	Strengthen the language of Goal 4 (Foster Sustainable, Inclusive, and Resilient Communities) to more clearly integrate environmental protection and climate change mitigation, adaptation, and resilience as foundational components of sustainable and inclusive communities.	If Trust Council wishes to action this recommendation it could revise the preamble to Goal 4 as follows: 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 in a manner that safeguards biodiversity and aim to fosters sustainable, inclusive, rural and resilient rural island communities resilient to climate change.
Directive Policy 3.4.2 – Growth Management 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.	Ministry of Agriculture	In addition to minimizing the fragmentation of forested lands, Islands Trust is encouraged to also recognize that fragmenting agricultural lands is detrimental to the long-term success of the industry. A suggested addition is highlighted in bold below: <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 and agricultural lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.</i>	PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.4.2 to read as follows: 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 and agricultural lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.</i>
	Agricultural Land Commission (ALC)	ALC staff echo the Ministry of Agriculture and Food staff’s comment which suggests minimizing impacts to agricultural land as a result of community growth and development	See preliminary staff recommendation above.
	Bowen Island Municipality	BIM has concerns about how policy 3.4.2 again mentions hunting	The Province of BC <u>recognizes</u> that First Nations may establish aboriginal rights to harvest wildlife for sustenance (food, social, and ceremonial purposes) within their traditional areas, and that treaty First Nations have treaty rights in relation to harvesting wildlife. Those uses of wildlife must be sustainable and harvesting methods must not jeopardize public safety or the use and enjoyment of property. Individuals who exercise an aboriginal right to hunt for sustenance purposes within a traditionally used area or who exercise treaty rights are

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			required to comply with hunting regulations related to public health and public safety. In situations where conservation of a particular species is of concern and compliance with hunting regulations is required by individuals exercising aboriginal or treaty rights, which may include the requirement for Limited Entry Hunting authorizations, there will be prior consultation with the affected First Nations in accordance with Ministry policy and procedures.
Directive Policy 3.4.3 – Impacts of Development	Islands Trust Conservancy (ITC)	That Directive Policy 3.4.3 be amended to read: "Consider the impacts on ecosystem services provided by the natural environment and the aesthetic, environmental, and social impacts of development."	If Trust Council wishes to implement this recommendation it could consider the following amendment to directive policy 3.4.3: 3.4.3 – Impacts of Development Consider the impacts of development on ecosystem services provided by the natural environment, as well as its aesthetic, environmental , and social impacts of development .
	Gabriola Island LTC	Clarify language in 3.4.3 re: Aesthetic and refer to current policy 5.1.3,	Revise draft directive policy 3.4.3 to read as follows: Impacts of Development <i>Consider the aesthetic, environmental and social impacts of development and ensure that views, scenic areas and distinctive features contributing to the overall visual quality and scenic value of the Trust Area are protected.</i>
Directive Policy 3.4.4 – Community Facilities and Services Ensure that each 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.	Ministry of Housing and Municipal Affairs	Consider elaborating on how the Trust will collaborate with service providers to ensure communities have the services they need	Staff do not recommend any revisions on the basis of this comment. Directives in the Policy Statement are about the expected content of LTC/IM bylaws, not the process of how they create those bylaws. Implementation of this policy would be achieved either by agreements with service providers that detail meeting frequency, purpose and information-sharing, or by individual LTC's reaching out to service providers (school districts, health authorities, recreation centre providers) at the time of major OCP updates. Section 476 of the Local Government Act sets out the requirement to engage with school districts affected by a proposed OCP amendment, and Section 475 sets out the other service providers that a local government <i>may</i> engage with at that time. If Trust Council is looking to amend this policy in accordance with MUNI's suggestion, it could be done as follows: 3.4.4 Community Facilities and Services <i>Collaborate with service providers to ensure that each community's, and local Indigenous communities', current and projected long-term needs for educational, institutional, community, health, cultural and recreational facilities and services, and outdoor recreation are considered and planned for.</i>

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			The effect of adding this additional requirement to the directive is that upon receiving a local bylaw for assessment of whether it is contract or at variance the Policy Statement, Executive Committee will have to assess whether the LTC/IM has demonstrated sufficient collaboration with services providers. As part of implementation planning there would need to be consideration of whether a service provider engagement record would need to be provided to Executive Committee at time of bylaw submission
Directive Policy 3.4.5 – Climate Change Mitigation and Adaptation Implement planning and land use management strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.	Gabriola Island LTC	Amend draft policy 3.4.5 with some language to include language similar to the following: 'Implement planning and land use management strategies such as preservation of forests, preservation of natural wetlands, and concentrating residential density within walking distance of transit routes and amenity areas, and promote both human and nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.'	A previous version of Policy 3.4.1 in the 2024 draft Policy Statement contained some language that addressed this recommendation: Sustainable Development <i>Ensure development is compact, energy-efficient, and appropriately situated on the island and on the site in order to:</i> • <i>reduce dependency on private automobile use, and support increased use of trail systems, public transportation, and active transportation</i> • <i>be compatible with preservation and protection of the Trust Area and its unique amenities and environment, and</i> • <i>limit impacts on Indigenous cultural heritage, harvesting and hunting areas.</i> However, Trust Council resolved in 2025 to amend 3.4.1 to instead say: 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> One option to address GB LTC’s recommendation about directive 3.4.5 is as follows: Climate Change Mitigation and Adaptation <i>Implement planning and land use management strategies to reduce climate-related risks, ; and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities minimize greenhouse gas emissions and consider nature-based solutions to adapt to climate change-related vulnerabilities.</i>
	Salt Spring Island LTC	Strengthen Policy 3.4.5 – Climate Change and Land Use to avoid new or increased exposure to climate-related risks, reduce greenhouse gas emissions, and support proactive climate adaptation measures through land-use planning and nature-based solutions.	See preliminary staff recommendation above in Guiding Principles section re new guiding principle Mitigate and Adapt to Climate Change

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Directive Policy 3.4.6 – Hazardous Areas	Salt Spring Island LTC	Strengthen Policy 3.4.6 – Climate and Natural Hazard Risks to be more anticipatory and future-focused, emphasizing risk avoidance rather than reliance on adaptation alone, and restricting development in areas subject to present and projected climate-related hazards.	If Trust Council wishes to action this recommendation it could consider the following amendment to directive policy 3.4.6: Hazardous Areas <i>Identify areas at elevated risk of current and future 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>
Directive Policy 3.4.23 – Transportation Network Vulnerabilities	Salt Spring Island LTC	Add a new advocacy policy in Transportation that recognizes the impacts that BC Ferries has on island communities and encourage BC Ferries to be an active and willing partner in long-term island community planning.	The draft Policy Statement does not contain advocacy policies meant for other agencies. If Trust Council were to add a new advocacy section, staff recommend Trust Council discuss the range of advocacy topics to be included. If, however, Trust Council wants an Advisory Policy for LTCs/IMs on this subject, it could add a new advisory policy 3.4.23 in the Transportation section that says: Ferry Service <i>Cooperate with BC Ferries to manage impacts from, and address long-term community needs for, ferry service to and from the islands.</i>
3.4.26 – Waste Disposal Systems 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.	Ministry of Housing and Municipal Affairs	While the intent of this policy appears to be protective, the current phrasing may unintentionally suggest that new wastewater disposal systems should be located near Indigenous Peoples’ cultural heritage sites and marine harvesting areas. To avoid this implication, it may be helpful to reword the policy to clarify that these areas are particularly sensitive and must be safeguarded from potential impacts	PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.4.26 to read as follows: 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 protecting Indigenous Peoples’ cultural heritage sites and marine harvesting areas.</i>
3.4.27 – Preservation of Natural Heritage Identify, preserve, protect, and support the restoration of natural heritage sites	Ministry of Housing and Municipal Affairs	The inclusion of this policy in the Recreation section implies some connection to recreation, but that connection is not clear, as the policy only discusses protection and restoration of natural heritage sites.	PRELIMINARY STAFF RECOMMENDATION Revise draft directive policy 3.4.27 to read as follows: 3.4.27 3.4.9 – Preservation of Natural Heritage Sites <i>Identify, preserve, protect, and support the restoration of natural heritage sites.</i> And move draft directive policy from Directive Policies – Recreation section, to Directive Policies – Managing Growth and Development section.
3.4.29 – Access to Community Marinas, Boat Launches, and Docks	Ministry of Housing and Municipal Affairs	It may be helpful to include information on where or how jurisdiction is shared or assumed by Transport Canada, Fisheries and Oceans Canada, or the	Staff do not recommend amending the directive policy in response to this recommendation. Directives in the Policy Statement are about the expected content of LTC/IM bylaws. The Policy Statement is not intended to provide education to the public on jurisdiction and the

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Identify and support safe public access and routes to community marinas, boat launches, and docks		Ministry of Water Lands and Resource Stewardship. This would clarify public expectations of the role of the Trust and the shared accountability for outcomes	roles of different level of government. However, Islands Trust could provide additional education materials on jurisdiction in the marine environment.
Directive Policy 3.4.30 – Access to Anchorages Identify appropriate and safe small-craft anchorage public-access locations.	Ministry of Housing and Municipal Affairs	It may be helpful to include information on where or how jurisdiction is shared or assumed by Transport Canada, Fisheries and Oceans Canada, or the Ministry of Water Lands and Resource Stewardship. This would clarify public expectations of the role of the Trust and the shared accountability for outcomes	Staff do not recommend amending the directive policy in response to this recommendation. Directives in the Policy Statement are about the expected content of LTC/IM bylaws. The Policy Statement is not intended to provide education to the public on jurisdiction and the roles of different level of government. However, Islands Trust could provide additional education materials on jurisdiction in the marine environment.
Directive Policy 3.5.2 – Freshwater Demand and Supply Projections Ensure that existing, anticipated, and seasonal water demand and water availability are considered. Directive Policy 3.5.3 – Freshwater Self-Sufficiency Ensure that islands are self-sufficient in their supply of freshwater. Advisory Policy 3.5.5 – Freshwater Quality Ensure that freshwater quality is maintained or remediated. Advisory Policy 3.5.6 – Freshwater Uses Strive 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. Advisory Policy 3.5.7 – Freshwater Storage Encourage freshwater storage in groundwater regions where the quality or	Ministry of Housing and Municipal Affairs	Freshwater presents a policy area in which the Trust must cooperate with service providers and other relevant agencies to achieve sustainability objectives, particularly those related to maintaining water quality and ensuring long-term availability. These policies could be further strengthened by more clearly articulating the expected forms of cooperation with service providers and the Province, including the roles, responsibilities, and coordination mechanisms that will support effective implementation of freshwater policy objectives focused on preserving water quality and availability	Staff do not recommend amending the directive policy in response to this recommendation. Directives in the Policy Statement are about the expected content of LTC/IM bylaws, not the process of how they create those bylaws. The Policy Statement is not intended to provide education to the public on jurisdiction and the roles of different level of government. However, Islands Trust could provide additional education materials on jurisdiction relating to freshwater governance.
	Bowen Island Municipality	It is unclear how LTCs and Island Municipalities would implement Policy 3.5.5	As an advisory Policy, BIM is not required to action this policy. Nonetheless, like local trust committees, BIM’s land use decisions can impact water quality, even if monitoring and maintaining the quality of freshwater is ultimately the jurisdiction of the Province.
	Islands Trust Conservancy (ITC)	That Advisory Policy 3.5.6 Freshwater Uses be made a Directive Policy.	Staff understand that in this policy “use” is synonymous with “consumption” in which case it is more appropriate as an advisory policy as Islands Trust does not license withdrawals from freshwater bodies. That authority rests with the Province. However, if the intention of the policy is that “use” refers to uses permitted by zoning on the surface of freshwater bodies, then it should be a directive policy, as that is a matter within Islands Trust jurisdiction.

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quantity of groundwater is likely to be inadequate or unsustainable. Directive Policy 3.5.8 – 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.			If it is the latter, rather than the former, Trust Council could consider the following revision: Trust Council could direct staff to refine this policy in coordination with Senior Freshwater Specialist.
	Bowen Island Municipality	It is unclear what exactly the “forest management practices” discussed in Policy 3.5.8 would entail	The sentiment in this BIM comment is correct. Local trust committees/island municipalities are unlikely to regulate how land is logged/replanted through its LGA Part 14 zoning powers. As such, reference to “sustainable forest management practices” is more a signal about Trust Council’s interest than a use that will be regulated. If there are areas of the land that is zoned to permit forestry that are of high ecological value that a local trust committee or island municipality wishes to protect, then it should introduce development permit areas to protect them.
	Gabriola Island LTC	Add directive policy on Freshwater Storage, with a focus on requiring freshwater storage where groundwater supplies are known to be of poor quality or quantity	If Trust Council wishes to action this recommendation it could revise advisory policy 3.5.7 to become a new directive policy as follows (subject to review by the Senior Freshwater Specialist): Freshwater Storage <i>Require freshwater storage for new development in groundwater regions where the quality or quantity of groundwater is likely to be inadequate or unsustainable.</i>
		Add advisory policy on Freshwater Conservation and storage	If Trust Council wishes to action this recommendation it could create a new advisory policy as follows (subject to review by the Senior Freshwater Specialist): Freshwater Conservation <i>Encourage island residents to minimize freshwater use and to capture and store freshwater</i>
		Advisory policy that supports the creation of Community Forests to support sustainable, regenerative and small-scale forest harvesting activities.	If Trust Council wishes to action this recommendation it could create a new advisory policy as follows: 3.5.XX Community Forests <i>Support the creation of community forests for sustainable, regenerative and small-scale forestry.</i>
	Salt Spring Island LTC	Strengthen Freshwater policies by converting advocacy policies into a directive policy that explicitly enables and requires coordination with the Province, regional and improvement districts, First Nations, and other authorities to protect long-term potable water resilience across the Trust Area.	Staff do not recommend creation of directive policies that require coordination. Directive policies in the Policy Statement are generally about the content of LTC and IM bylaws, not the process that leads to the creation of those bylaws. It is not practical to require that Executive Committee assess if local bylaws are contrary to or at variance with the Policy Statement based on the extent of coordination with other governments, because those governments may not want to coordinate with local trust committees/island municipalities.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
			If Trust Council wishes to respond to this recommendation it could consider the following language in an advisory policy: Freshwater Coordination <i>Cooperate with relevant agencies, organizations and Indigenous Governing Bodies to protect long-term potable water resilience in the Trust Area</i>
Directive Policy 3.5.11 – Protection of Agricultural Lands Identify and protect agricultural lands within the Agricultural Land Reserve for current and future use consistent with the Agricultural Land Commission Act and its regulations, while considering downstream impacts, wildlife habitat, and adjacent properties.	Ministry of Agriculture	Ministry staff note that the third iteration of the Statement is similar to the second iteration and that minimal changes were made to the Policies that apply to Agricultural Lands. One notable change is to Directive Policy 3.5.11 (previously numbered as 3.5.9 in the second iteration) that now only identifies and protects agricultural lands “within the Agricultural Land Reserve” (ALR). Previously, this policy identified and protected all agricultural lands; irrespective of whether they were located in the ALR. Ministry staff note that a significant number of smaller agricultural operations occur on properties outside of the ALR and that collectively, they make a meaningful contribution to both the food security and economic output throughout the Islands Trust area. Given this, Ministry staff encourage Islands Trust to revert the wording of Directive Policy 3.5.11 to the previous wording from the second iteration of the Statement.	As background, the previous Policy 3.5.9 (from September 8, 2023) referenced in the ministry’s comment read: Protection of Agricultural Lands <i>Identify and protect agricultural lands for current and future use while considering downstream impacts, wildlife habitat, and adjacent properties.</i> Current proposed policy 3.5.11 says Protection of Agricultural Lands <i>Identify and protect agricultural lands within the Agricultural Land Reserve for current and future use consistent with the Agricultural Land Commission Act and its regulation, while considering downstream impacts, wildlife habitat, and adjacent properties.</i> Trust Council should note that Indigenous Governing Bodies in earlier Policy Statement engagement expressed concern about the downstream impacts of farming in the islands on their harvesting areas PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.5.11 to read: Protection of Agricultural Lands <i>Identify and protect agricultural lands within the Agricultural Land Reserve for current and future use consistent with the Agricultural Land Commission Act and its regulation, while considering downstream impacts, wildlife habitat, and adjacent properties.</i>
	Capital Regional District (Board)	That draft policy 3.5.11. Protection of Agricultural Lands be revised to read: "Identify and protect lands within the agricultural land reserve and other agricultural lands as defined by the BC	When considering the staff recommendation Trust Council should consider the extent to which it wishes to encourage agriculture on land that is outside of the ALR. While farming is and was an important part of island economies and culture, it also usually corresponds with clearing forest land, and land disturbance, which may be inconsistent with ecosystem and cultural heritage protection goals in the Policy Statement.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
		Ministry of Agriculture for current and future use for agriculture."	See preliminary staff recommendation above.
	Bowen Island Municipality	Policy 3.5.11 has issues as the Agricultural Land Commission sets the rules for usage of ALR lands, it is unclear how downstream impacts would be dealt with	This comment from BIM is correct. If an activity qualifies as a standard farm practice under the ALC's regulations, then it is permitted, regardless of downstream or neighbourhood impacts. Complaints about off-site impacts would be taken to, and resolved through, the Farm Industry Review Board. Regardless, Ministry of Agriculture staff have recommended that this policy be revised. See preliminary staff recommendation above. If this change is made, then offsite impacts could be considered as LTCs/IMs identify which non-ALR farmland should be protected.
	Salt Spring Island LTC	Acknowledge Agriculture as a keystone of community planning and resilience. Develop a directive policy that explicitly enables and requires coordination with the Province, the Agricultural Land Commission, regional districts, First Nations, and other authorities to protect long-term agricultural viability and resilience in the Trust Area.	If Trust Council wishes to action this recommendation, staff recommend that it do so as a guiding principle: Celebrate and Promote Agriculture <i>To recognize the important role of farming in the development of island communities and ensure that viable farm businesses can be sustained into the future for economic and food security</i> Staff do not recommend creation of directive policies that require coordination. Directive policies in the Policy Statement are generally about the content of LTC and IM bylaws, not the process that leads to the creation of those bylaws. It is not practical to require that Executive Committee assess if local bylaws are contrary to or at variance with the Policy Statement based on the extent of coordination with other governments, because those governments may not want to coordinate with local trust committees/island municipalities If Trust Council wishes to respond to this recommendation it could consider the following language in an advisory policy: Agricultural Coordination <i>Cooperate with relevant agencies, organizations and Indigenous Governing Bodies to protect long-term agricultural viability and resilience.</i>
Directive Policy 3.5.18 - Soil and Fill from Middens and Foreshore Areas of Cultural Significance Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.	BC Ferries	– the directive policy to “prohibit alteration, removal or excavation” could limit required construction and development. The related directive 3.2.1 Indigenous Cultural Heritage Sites, which states “Minimize potential adverse impacts to Indigenous cultural heritage sites...” seems more appropriate. It is unclear which of the	Staff concur that the current wording of 3.5.18 is problematic. Prohibition implies that a regulation would be required. However, digging a hole, particularly in an area without clearly mapped borders, is not a use that can be regulated through zoning. Tools to manage land works within sensitive areas are: • Heritage Conservation Areas, • Development Permit Areas and • Soil Deposit and Removal Bylaws.

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
		two directives supersedes the other. BC Ferries is committed to engaging with First Nations for all land and marine-based construction and development projects. We are committed to engaging with First Nations for the life cycle of our projects and working to avoid or mitigate issues of concern raised by potentially impacted First Nations. We recommend revising directive 3.5.18 to “minimize alteration, removal or excavation”.	Restrict is defined in the draft Policy Statement as: To confine, bound or limit, not necessarily prohibit. The recommended revision would set an expectation that all OCPs include a policy requiring a permit for soil or fill deposit and removal from all identified archaeological sites, including middens or foreshore areas identified as culturally significant, or at the least a policy establishing expectations for development applications in these areas. <u>Alternative option:</u> Remove policy 3.5.18 from the draft Policy Statement, as protection of registered archaeological sites is managed by the Province under the Heritage Conservation Act. PRELIMINARY STAFF RECOMMENDATION: Revise draft directive policy 3.5.18 to read as follows: Soil and Fill from Middens and Foreshore Areas of Cultural Significance Prohibit Restrict alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.
Directive Policy 3.5.18 - Soil and Fill from Middens and Foreshore Areas of Cultural Significance Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas.	BC Ferries	Supporting infrastructure required for ferry services should be permitted where required and setbacks from the sea may not be feasible. We recommend modifying the language to “taking into account marine transportation needs and best practices recommended by the federal and provincial governments”.	In responding to this recommendation, Trust Council can consider whether ferry service providers should be granted any allowances that would not apply to other waterfront land owners. Given that by nature of their operations ferry infrastructure will be located adjacent to the natural boundary of the sea, and that ferry service providers are expected to undertake work in accordance with provincial and federal safety and environmental standards, Trust Council could exempt them from the regulations that may apply to other waterfront land owners. However, if Trust Council thinks LTCs/IMs should retain regulatory oversight of BC Ferries infrastructure relative to the natural boundary of the sea, it can forego any language that implies reduced requirements for the ferry service, as the company suggests in its referral response. If Trust Council wishes to implement this BC Ferries recommendation, it could revise directive policy 3.5.20 as follows: Setbacks from the Sea <i>Incorporate current and anticipated impacts from sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best</i>

PRINCIPLE/POLICY	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
			<i>practices recommended by the federal and provincial governments and the needs of ferry service providers and marine commercial and industrial uses.</i>
Directive Policy 3.5.20 – Setbacks from the Sea 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.	BC Ferries	Generally this directive policy is appropriate, however, we’d like to acknowledge that there may be situations where future ferry related developments could impact sensitive areas where BC Ferries’ vessels moor. Careful design and construction, supported by environmental offsets, should be permitted to mitigate concerns of moorage in sensitive marine areas.	If reconfiguration of a ferry terminal requires new development in a sensitive marine area, a local trust committee/island municipality may not support it, either through not approving any required zoning change or by not issuing a development permit if it is in an environmental protection development permit and the application does not meet the established guidelines for permit issuance.
Directive Policy 3.5.22 – Vessel Moorage 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.	BC Ferries	If reconfiguration of a ferry terminal requires new development in a sensitive marine area, a local trust committee/island municipality may not support it, either through not approving any required zoning change or by not issuing a development permit if it is in an environmental protection development permit and the application does not meet the established guidelines for permit issuance.	

COMMENTS NOT RELATED TO SPECIFIC NUMBERED POLICIES			
TOPIC	AGENCY	COMMENT	STAFF COMMENT/OPTIONS/RECOMMENDATIONS
Infrastructure & Servicing	North Salt Spring Waterworks District	How utilities, infrastructure, and servicing is considered in the Policy Statement is limited and unclear. There are some references that are focused on other issues, but little guidance is provided on service planning to support land use. As this document will be used to inform Official Community Plans and regulatory bylaws, language should be added to address these important considerations. For example, the current Salt Spring Island OCP lists a dedicated section on infrastructure “Part C – Infrastructure and Servicing Objectives and Policies” which includes many important objectives and policies. It should be recognized that these are significant land use considerations that ensure that the needs of the community are met and also	To address this suggestion, Trust Council could consider a couple of different variations on this as a new directive policy 3.5.5 and 3.5.6, such as: 3.5.5 Land Use Changes within Community Water Systems <i>Ensure that potential water demand of land uses within community water system service areas does not exceed the licensed capacity of the system or the amount of water that can be safely withdrawn from each system’s water source.</i> 3.5.5 Land Use Changes within Community Water Systems

		provides improved fiscal planning and communities. It is recommended that Principles and Policies are added to the Draft Policy Statement to address water utility infrastructure and services.	<i>Ensure that changes to land uses within community water system service areas are made in coordination with the service provider</i> 3.5.6 Land Use Changes adjacent to Community Water Systems <i>Ensure that changes to development potential outside of community water system service areas will not compromise the ability of a community water system to meet its service obligations.</i> The need to coordinate with water services providers is also partly addressed in proposed policy response to Regional District of Nanaimo’s recommendation above. Advice on this suggestion requires further coordination with the Senior Freshwater Specialist.
Encouraging new housing units for families	School District 68 (Nanaimo Ladysmith)	The District is very much interested in proactively encouraging the growth of additional homes built for families. Gabriola is the District’s most under-enrolled school . . . Further, in the event that government priorities shift (which we have no knowledge of) a more robust population will ensure the long-term viability of the school.	Policies in the draft Policy Statement encourage more diverse housing options within the context of Indigenous cultural heritage and ecosystem protection. The School District should contribute to the planning process for the Gabriola Island Official Community Plan.
Alignment with Province’s Climate Adaptation Strategy	Ministry of Energy and Climate Solutions	Please also ensure your PSs/OCPs/RGSs align where possible with the CleanBC Roadmap to 2030 and the Climate Preparedness and Adaptation Strategy .	The draft Policy Statement is aligned with Clean BC Roadmap to 2030 in many ways -see particularly draft policy 3.4.20 re transportation, draft policy 3.3.1 re protected area networks (protected areas can act as natural assets and protect carbon sinks), draft policy 3.5.8 re maintaining large land holdings and parcel sizes to support sustainable forest management practices. The draft Policy Statement is aligned with Climate Preparedness and Adaptation Strategy in many ways – see particularly draft policies 3.3.1-3.3.11, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 3.5.43.5.20, 3.5.21.
Maps	Ministry of Housing and Municipal Affairs	<i>Section 1.2 – Map of the Islands Trust Area</i> provides a graphic representation of the Trust Area. Ballenas Winchelsea is identified as a “Local Trust Area”; however, Under s.23(5) of the <i>Islands Trust Act</i> and per Schedule B of the <i>Islands Trust Act</i> , Ballenas Winchelsea is not within a Local Trust Area. While the Trust may wish to move away from the term “Executive Islands,” referring to Ballenas Winchelsea as a Local Trust Area may be misleading.	PRELIMINARY STAFF RECOMMENDATION: Direct staff to develop a revised map for inclusion in the draft Policy Statement that addresses feedback from Ministry of Housing and Municipal Affairs.
		The map could also be better aligned with the map on the “Overview of the Islands Trust” webpage (Link: https://islandstrust.bc.ca/about-us/overview-of-islands-trust/). This map features Island labels which generally point to the Island land masses, rather than the waters surrounding each island. This	See preliminary staff recommendation above.

		is more accurate, and preferable to the map that is currently shown in the Policy Statement (pg. 5). It is suggested that labels on Trust Area maps be applied to the land, rather than the water, whenever possible.	
Consultation/Collaboration with other Agencies	Regional District of Nanaimo	. . . we are supportive of the direction of the Islands Trust Policy Statement and request that it include references to consultation with regional districts that provide services which may be affected by Islands Trust policies.	See preliminary staff recommendation above for section 2.3 Cooperation Principles
	Capital Regional District (Board)	Where appropriate, Islands Trust should ensure Islands Trust policies include "collaboration with other agencies required to achieve policy goals", e.g., waste water, roads, recreation, street lighting, active transportation.	Given previous Trust Council direction to <i>reformat the draft Trust Policy Statement to simplify the structure and shorten the length to improve readability and understanding</i> staff do not recommend that “collaboration with other agencies” be added to all directive policies where collaboration might be anticipated, which is most of them. With the exception of 3.1.1, directives in the Policy Statement are about the expected content of LTC/IM bylaws, not the process of how they create those bylaws. See preliminary staff recommendation above for section 2.3 Cooperation Principles
Document Glossary/Definitions	North Salt Spring Waterworks District	It is our understanding that the term “freshwater” includes all types of Island water sources including drinking/community water, but this term is not defined in the Glossary of Terms. It is recommended that the definition of freshwater be provided and/or that there should be specific Principles and Policies that consider drinking/potable water.	Staff concur that these terms should be defined in the glossary of terms. Add the following definition to the glossary of terms to the draft Policy Statement: <i>Freshwater means all non-saline water occurring naturally on, above, beneath, or flowing through watersheds within the Islands Trust Area, including precipitation, groundwater, watercourses, lakes, wetlands, springs, soil moisture, and ephemeral waterbodies, and the interconnected hydrological processes that sustain their quantity, quality, and ecological function.</i>
	Islands Trust Conservancy (ITC)	That terms and phrases in the draft Policy Statement be clarified relating to the concepts of biology, ecology, climate change, habitat restoration, habitat fragmentation, environment and sustainable communities, looking to definitions used in BC statutes and regulations as examples (e.g., Environmental Management Act, Water Sustainability Act, etc.): these Acts include statutory definitions for environmental terms	Staff concur that it may be helpful to define additional terms in the document using terms already defined in Provincial legislation or other official documents. Staff have not undertaken this work as yet. Trust Council may wish to direct staff to do so.
	Capital Regional District (Board)	In the glossary, define affordable and attainable housing.	See above preliminary staff recommendation for 3.4.11 to remove reference to attainable housing from the draft Policy Statement.

			Staff concur that “affordable housing” should be defined in the glossary of terms. PRELIMINARY STAFF RECOMMENDATION: Add the following definition to the glossary of terms to the draft Policy Statement: Affordable housing: Housing is considered affordable when 30 per cent or less of a household's gross income goes towards paying for its housing costs. (BC Housing)
	Bowen Island Municipality	There is a concern that terms such as 'appropriate,' 'self-sufficient,' and 'limit the scale of development' are too vague and lack clear, actionable definitions	To date, Trust Council seems to have demonstrated a policy preference for policies that allow latitude for both LTC/IM interpretation and implementation. If Trust Council wishes to action this recommendation by Trust Council, it could consider directing staff to “Identify policies in the draft Policy Statement that could be revised for greater clarity of interpretation.” Trust Council must decide whether it prefers some measure of interpretive latitude, so that LTCs/IMs can find their own path toward addressing directives, even at the cost of uncertainty about whether that path will be satisfactory to EC/TC, or whether Trust Council should make policies more prescriptive with tools or targets incorporated into the directive policies itself which adds certainty to how EC will expect them to be applied, at the cost of flexibility for LTCs/IMs.
	Salt Spring Island LTC	Clarify through improved wording and/or definitions that the preservation and protection of the natural, terrestrial, and marine environment is central to the Islands Trust mandate.	Trust Council could consider returning a definition of “environment” to the glossary, and that definition could be the one from the British Columbia <i>Ministry of Environment Act/Environmental Management Act</i>: “Environment includes air, land, water and all other external conditions or influence under which humans, animals and plants live or are developed.”
Commitments to Trust Council	Islands Trust Conservancy (ITC)	Adding a new section, such as a commitment of Trust Council, which includes long-standing advocacy positions such as: no fixed links between Vancouver Island and the islands in the Trust Area (i.e. no bridge policy), the elimination of clear-cut logging of old growth forests, opposition to large vessel anchorages in the Salish Seas and stronger tools for protection of biodiversity.	Adding a new advocacy section would reverse direction provided by Trust Council resolutions in 2022:

			3 Remove detailed coordination policies from each subsection and instead develop more general coordination principles in accordance with the object of the Trust. 4 Remove detailed “commitments of Trust Council” from each subsection and instead develop more general guiding principles in accordance with the object of the Trust. If Trust Council were to add a new advocacy section, staff recommend Trust Council discuss the range of advocacy topics to be included. A sample of advocacy topics is available in the Advocacy Summary for the 2018-2022 term on pages 172-185 of the Sept. 2022 Trust Council agenda, and topics from the 2022-2026 term are available under the Advocacy Letters webpage.
	Gabriola Island LTC	Consider adding a new section, such as commitments of Trust Council, that list longstanding Trust Council advocacy positions such as no fixed links between Vancouver Island and Mainland and the islands in the Trust Area notwithstanding the bridge connecting North and South Pender Island, the elimination of clear cut logging of old growth forests, opposition to anchorages in the Salish Sea, and stronger tools for protection of biodiversity	See above.
Implementation of the Policy Statement	Ministry of Housing and Municipal Affairs (MUNI)	<i>Implementation</i> - As noted in the ‘Goals and Policy’ section of this letter, Directive Policy 3.1.1 directs Local Trust Committees and island municipalities to engage with Indigenous Governing Bodies and to keep records of engagement for the purpose of supporting bylaw adoption. To strengthen implementation of this policy, when preparing bylaws for Ministerial review, the Trust should develop processes which demonstrate how it has: - o prepared for Indigenous input with thoughtful assessment of the potential impacts on the environment, the community, and Indigenous Governing Bodies, - o been clear about intentions and open and genuine in seeking input, - o considered the perspectives shared and worked towards consensus and collaboration in the policies where possible, and - o responded to the community and to Indigenous Governing Bodies about what is reasonable, practical or necessary to include in the resultant proposed bylaws.	These Ministry standards will be addressed outside of the Policy Statement document and will be considered for inclusion in the Policy Statement Implementation Plan, and likely also in a related Trust Council operational policy, and/or operational procedure.
	Ministry of Housing and Municipal Affairs (MUNI)	<i>Implementation</i> - As noted throughout this letter, implementation of the Policy Statement can be strengthened by emphasizing the established and emerging collaborative partnerships in which the Trust is engaged, and by clearly defining roles and responsibilities	Should Trust Council wish to add more educational information about the respective roles of other bodies to the Policy Statement, an approach would be to re-add some variation of the language that was in section 2.2 of the 2021 draft Policy Statement (pages

		in policy areas where decision-making is shared with and/or informed by external agencies, or jurisdiction overlaps. Similarly, providing clearer definition around the respective roles of regional districts, improvement districts, and provincial and federal governments, as applicable, may assist future readers in understanding how to apply the Policy Statement in practice.	8-10) to the implementation section of the current draft (Noting that there would be collaborative work needed with Indigenous Governing Bodies to incorporate their substantive prior feedback on this previously proposed section. See Engagement with Indigenous Governing Bodies Phase 2 2022 section of Project Library section of Islands 2050 webpage for details of the feedback). An alternative is for Trust Council to pass a resolution to ask staff to provide more information about the respective roles of Islands Trust and other governments on the website.
	Salt Spring Island LTC	Within the implementation plan framework, include an option for a Local Trust Committee or island municipality to prepare a Context Statement that identifies the relationship between an Official Community Plan (OCP) and the guiding principles, goals, and directive and advisory policies of the Trust Policy Statement. The Context Statement should outline how the OCP will be made consistent with the Trust Policy Statement over time and it should be a part of an OCP.	If Trust Council wishes to respond to this recommendation it could amend wording in the Policy Statement Implementation Plan section as follows: 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; this could include reference to context statements that describe the relationship between an official community plan (OCP) and the guiding principles, goals, and directive and advisory policies of the Policy Statement.
	Bowen Island Municipality	Finally, BIM has suggestions for the implementation section of the Policy Statement. BIM suggests that in the paragraph discussing the statutory bylaw approval process for Island Municipalities, it should be expanded upon, clarifying which BIM bylaws are referred to the Islands Trust. A statement that specifically refers to engagement and communication with Island Municipalities should be added	The Islands Trust Act, the Bowen Island Municipality letters patent, and any other corresponding agreements between the two bodies determine the BIM bylaws that must be referred to Islands Trust. If Trust Council wishes to add clarity to the draft Policy Statement paragraph referenced here, it could make the following amendment to the final paragraph under the Island Municipalities subsection of the greater Statutory Bylaw Approval Process section: <i>“Although not required under the Islands Trust Act, the letters patent for Bowen Island also require referral of bylaws, other than official community plan bylaws, that have any reference to a matter included in the Policy Statement.”</i> If there is confusion among Islands Trust and Bowen Island Municipality about which bylaws should be referred to islands trust, that should be addressed through meetings.

			Draft Cooperation Principle 2.3.2 may be sufficient to address the concern in the final clause of BIM’s recommendation: Collaborate with Island Municipalities <i>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.</i>
	Gabriola Island LTC	that an implementation plan be developed as part of the Policy Statement	Staff are working on an implementation plan and will bring it forward when ready for Committee of the Whole/Trust Council consideration.
	Gambier Island LTC	Include language to emphasize that Directive Policies should be applied in a manner that respects the different local context of each Local Trust Area.	If Trust Council wishes to action this recommendation, it could consider an additional paragraph to the Statutory Bylaw Approval Process under Part 4: Implementation as follows: <i>“When determining whether a local trust committee or island municipality bylaw is contrary to, or at variance with, the Policy Statement, Executive Committee and/or Trust Council should consider the unique local context of each local trust area and island municipality.”</i>
Hierarchy of Policies	Bowen Island Municipality	Bowen Island Municipality requests that changes be made to the language of the Islands Trust Policy Statement to reinforce the hierarchy of policies so that Values, Directive Policies, and Advisory Policies are clearly distinguishable from each other. BIM requests that the Trust establish a more defined hierarchy so that BIM can have a better understanding of bylaws that are “at variance” with the ITPS as per s. 15 of the Islands Trust Act. This is of importance as expansion of Directive Policies increases this risk of bylaws being seen as “at variance” by the Executive Committee.	Staff expect that Executive Committee will continue to review local bylaws through the lens of directive policies only. However, consideration of whether a local bylaw is contrary to, or at variance with, the Policy Statement is a political decision and staff cannot anticipate how a future Executive Committee or Trust Council may respond to a particular local bylaw. If Trust Council wants a more structured approach to local bylaw reviews, it could request staff to develop such.
Bylaw Submission	Ministry of Housing and Municipal Affairs (MUNI)	<i>Bylaw Submission</i> - Please ensure that when the final bylaw is referred to the Minister of Housing and Municipal Affairs for review, the submission package includes a record of comments from all interest holders, First Nations and other agencies. A detailed engagement log, dating back to the project’s initiation in 2019, should also be included, clearly illustrating how the Islands Trust responded to each comment	Islands Trust staff will include the requested records.
Importance of Measurable Outcomes	School District 79 (Cowichan Valley)	We believe its success will depend on clear implementation strategies and accountability mechanisms. To that end, we encourage the inclusion of measurable outcomes that will allow you to assess the effectiveness of these policies over time.	The draft Policy Statement notes that the Policy Statement Implementation Plan may guide development of targets and indicators with which Islands Trust Council can monitor and evaluate implementation of the Policy Statement.
		Additionally, we seek further clarity on how these policies will be enforced across local trust areas, particularly in relation to	The Islands Trust Act stipulates that official community plans and bylaws required to be submitted to Executive Committee or Trust

		engagement protocols and housing affordability. Ensuring that these goals translate into tangible, equitable outcomes will be key to realizing the vision set forth in the Statement.	Council under the Act 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 draft Policy Statement sets out required content for new OCPs/LUBs and for amendments to existing OCPs/LUBs but does not prescribe the method for implementing the directives. Thus, implementation of these directives will vary across the Trust Area. Generally, these policies will be enforced through a combination of Executive Committee assessing whether proposed local bylaws are contrary to or at variance with the Policy Statement, and monitoring outcomes on the islands. Proposed directive policy 3.4.15 requires LTCs/IMs to “prioritize the processing of rezoning applications from non-profit housing providers and public agencies.” Proposed directive policy 3.3.16 requires LTCs/IMs to consider regulating short-term vacation rentals in the interest of housing affordability. Trust Council has the option of making the policies more prescriptive and less open to interpretation. This could include Trust Council amending appropriate policies to specify the implementation method. For many draft policies this would involve replacing “Identify and protect” with “Establish a development permit area to” or establish minimum density requirements in appropriate areas. A companion handbook will provide LTCs/IMs with options for official community plan and land use bylaw approaches that may satisfy the directive policies set out in the Policy Statement about housing and housing affordability. Engagement standards will be informed by expectations of the Ministry of Housing and Municipal Affairs and Islands Trust own engagement framework.
Data Gaps	Bowen Island Municipality	BIM requests that gaps in data should be identified and clear demarcation be done regarding which responsibilities rest with the Islands Trust Council, Local Trust Committees, and Island Municipalities respectively	A data inventory of existing/missing information is necessary. This need will likely be identified in the draft implementation plan.

			BIM should assume that it would be responsible for filling all required data gaps, except where data currently exists within the Islands Trust catalogue and can be accessed by BIM. How EC treats this issue, of data gaps relative to directive policies, should be addressed in Trust Council Policy 1.3.1 – Policy Statement Implementation
Amend Policy 1.2.1 Policy Statement Amendment Policy	Lasqueti Island LTC	A commitment of Trust Council to amend Trust Council Policy 1.2.1 (Policy Statement Amendment Policy), to ensure that a review is considered each term; a regular review process is defined; and the initiation of a Policy Statement Amendment Topic Review Inventory.	Staff suggest that this has been satisfactorily addressed through Trust Council’s amendments to Policy 1.2.1 – Policy Statement Amendment Policy in June 2026 Staff do not recommend setting out a review and amendment schedule in the bylaw itself.
	Salt Spring Island LTC	Develop and include a clear amendment process for the Trust Policy Statement to ensure it remains current and relevant, including a mechanism that allows any Islands Trust body to request amendments.	As above.
Land Ownership and Tenure	Gambier Island LTC	Include a general statement about the Islands Trust not having authority to alter land ownership or land tenure.	This does not need to be included as it is simply a fact. However, if Trust Council would like to address it, it could add a new final line to Section 1.4 – Purpose and Structure of the Policy Statement that says: <i>“The application and implementation of the principles and policies set out in this Policy Statement does not give Islands Trust the authority to alter land ownership or land tenure in the Islands Trust Area.”</i>
Distinction between LTCs and Island Municipalities	Bowen Island Municipality	A need to have stronger and clearer language acknowledging the difference between Local Trust Committees (LTCs) and Island Municipalities. The Islands Trust Policy Statement frequently equates LTCs and Island Municipalities, language should be added to make clear that Bowen Island Municipality has distinct municipal governance role and different statutory requirements compared to the statutory requirements of LTCs. For example, the document frequently uses the term “local planning area” which has no definition and could be better communicated by specifying Island Municipality or Local Trust Area.	This could be built out in an expanded implementation section in the Policy Statement bylaw itself describing how different actors will contribute to the implementation of the plan. See suggested language in Referral Agency table in response to a similar comment from the Ministry of Housing and Municipal Affairs. BIM comment is correct that “local planning area” is not a defined term in legislation. PRELIMINARY STAFF RECOMMENDATION: Replace instances of the term ‘local planning area’ with ‘local trust area or land in a municipality within the Trust Area’
Suggested resources to reference	Metro Vancouver	As Islands Trust staff move on to next steps, they may wish to consult Metro 2050, Climate 2050, and other Metro Vancouver resources for reference.	Metro 2050: Regional Growth Strategy Of note:

			• Metro Vancouver has a target to increase the area of lands protected for nature from 50% to 50% of the region’s land base by 2050. • Metro Vancouver has an ecological health framework that includes actions to collect and maintain data, including the Sensitive Ecosystem Inventory, tree canopy cover, imperviousness, and carbon storage datasets, report on gains and losses and climate change impacts on ecosystems. • Metro Vancouver has included a performance monitoring section which sets out changes they will monitor such as • percent of regional dwelling unit growth outside of urban areas, • Change in hectares of land protected for nature • Change in hectares of land identified as Sensitive or Modified Ecosystem • Change in hectares of identified Sensitive and Modified Ecosystems rated high-quality • Tonne of carbon storage in natural areas Metro Climate 205 Strategic Framework Of note: • sets a target of 45% reduction in emissions from 2010 levels by 2030, and carbon neutral region by 2050 • sets out climate projections for the region including at least 1 metre of sea level rise by 2100. more extreme rainfall events, and a summer rainfall decline by nearly 20% with increased likelihood of extended drought periods. • There are associated roadmaps for regional priorities including, nature and ecosystems. The land use and urban form roadmap is under development.
LTC Referral Responses	Denman Island LTC	Interests unaffected	
	Gabriola Island LTC	That the Gabriola Island Local Trust Committee recommend to the Islands Trust Council that proposed Bylaw No. 183 <u>proceed</u> , <u>subject to the following recommendations</u> (recommendations categorized appropriately throughout table	
	Galiano Island LTC	No response received	
	Gambier Island LTC	that the Gambier Island Local Trust Committee recommend to the Islands Trust Council that proposed Bylaw No. 183 <u>proceed</u> ,	

		subject to the following recommendations (recommendations categorized appropriately throughout table)	
	Hornby Island LTC	Interests unaffected	
	Lasqueti Island LTC	That the Lasqueti Island Local Trust Committee recommend to the Islands Trust Council that proposed Bylaw No. 183 <u>proceed</u> , <u>subject to the following recommendations</u> (recommendations categorized appropriately throughout table)	
	Mayne Island LTC	Interests unaffected	
	North Pender LTC	Interests unaffected	
	Salt Spring Island LTC	That the Salt Spring Island Local Trust Committee recommend to Trust Council that proposed Bylaw No. 183 <u>proceed</u> , <u>subject to consideration of the following recommendations</u> (recommendations categorized appropriately throughout table)	
	Saturna Island LTC	that the Saturna Island Local Trust Committee recommend to the Islands Trust Council that proposed Bylaw No. 183 <u>not proceed</u> for the following reasons: • Because of opinions expressed at the Saturna Community Information Meeting as reflected in the minutes, and • Because the province’s legislative framework for Reconciliation upon which we rely to do our work in this area is in flux.	
	South Pender Island LTC	that South Pender Island Local Trust Committee recommends to the Islands Trust Council that proposed Bylaw No. 183 <u>not proceed</u> for the following reasons: • Broad non-support from the community • This was a re-write not an amendment • The language contained in the re-write is problematic in general • Stepping into areas outside of the mandate of the Islands Trust • Missing the Islands Trust Object and its meaning • And as per correspondence submitted to Islands 2050 from South Pender	
	Thetis Island LTC	that the Thetis Island Local Trust Committee <u>recommend proceeding with Bylaw No. 183 subject to Trust Council committing to a list of topics for incremental improvements post adoption</u>	Staff suggest that this has been satisfactorily addressed through Trust Council’s amendments to Policy 1.2.1 – Policy Statement Amendment Policy in June 2026.