

# Agency Referrals Phase 1 Report

## Islands 2050 - Policy Statement Amendment Project

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### Agency Referrals Phase 1

In July 2021, Trust Council directed staff to undertake a first phase of formal referrals of Draft Policy Statement Bylaw No. 183 to Islands Trust bodies (local trust committees, island municipalities, and the Islands Trust Conservancy Board), regional districts, school districts, improvement districts, provincial government agencies, and federal government agencies. An Information and Q&A Session was held for all agencies on July 28, 2021, and the zoom webinar recording was subsequently sent to all agencies. The referral period was open for three months and closed at the end of October 2021.

**A listing of all agencies who were invited to comment, and the detailed responses received, have been posted to the [Islands 2050 webpage](#), under the “Agency Referrals Phase 1” project library folder.**

Summaries of the responses are listed below. Please note that referrals of the draft Policy Statement bylaw to First Nations are occurring through a separate engagement process (see Attachment 1 - “First Nations Engagement Phase 2 Summary Report” to learn more about Phase 2 of early and meaningful engagement with First Nations).

### Referral Responses from Islands Trust Bodies

The draft Policy Statement Bylaw No. 183 was sent to all 13 local trust committees (LTCs) in the Trust Area, Bowen Island Municipality, and the Islands Trust Conservancy Board. Of these, only Bowen Island Municipality and the Islands Trust Conservancy Board sent in substantive responses on the draft document. **All LTCs stated that they would not respond or would defer comment until the Islands 2050 Phase 3 public engagement was complete.** Please see detailed responses posted to the Islands 2050 webpage.

- **Bowen Island Municipality (BIM):** BIM submitted an extensive list of comments on Draft Bylaw No. 183. These contained some general comments on structure/language, the need for a glossary or definitions section, requests for a table outlining directive policies, and a desire to not see BIM’s Islands Trust tax requisition increase as a result of the Policy Statement update. BIM also provided specific comments related to policies concerning: housing, desalination, docks, hard shores, oil tanker traffic, clear cutting, tree cutting authority, wildfire protection, species at risk, microplastics, large land holdings, finfish farms, and ferries.
- **Islands Trust Conservancy (ITC) Board:** The ITC Board suggested clarification of key terms and phrases related to biology, ecology, and restoration throughout the document, recommended some specific amendments to the “Establishment of the Islands Trust” and “Role of the Islands Trust Conservancy” sections, and suggested that the ITC Board be added as a coordination partner on regulation of hunting or harvesting of wildlife or vegetation in the Trust Area (Policy 4.1.12). The ITC Board also requested by resolution that it receive a referral of the Policy Statement after first reading, given that the document was undergoing further engagement.

### Referral Responses from Regional Districts

The draft Policy Statement Bylaw No. 183 was sent to seven Regional Districts in the Trust Area. One recommended approval with no change. Two recommended approval with some suggested refinements. Three indicated that their interests were unaffected or had no concerns/suggestions. One did not respond. Please see detailed responses posted to the Islands 2050 webpage.

- **Metro Vancouver Regional District** **recommended approval** of the draft bylaw, indicating broad alignment with many of their own current long range planning documents.
- **Comox Valley Regional District** **recommended approval** of the bylaw, noting areas they were particularly glad to see (reconciliation, nature-based solutions, affordable housing) and **recommending amendments** to better support trails, active transportation, and best practices/solutions for climate emergency preparedness.
- The **Capital Regional District's** Regional Parks division **suggested amendments** to better support active recreation and active transportation networks.
- **Cowichan Valley Regional District, Nanaimo Regional District, and qathet Regional District** indicated that their **interests were unaffected** or that they had no concerns.
- No response was received from the **Sunshine Coast Regional District**.

### Referral Responses from School District Boards

The draft Policy Statement Bylaw No. 183 was sent to seven School District Boards in the Trust Area. Two responses were received. Please see detailed responses posted to the Islands 2050 webpage.

- **School District 46 (Sunshine Coast)** **suggested amendments**, advocating for School Districts to be included as coordination partners on transportation and ferry services (Policy 6.3.3).
- **School District 64 (Gulf Islands)**, indicated that their **interests were unaffected**

### Referral Responses from Improvement District Boards

The draft Policy Statement Bylaw No. 183 was sent to 26 Improvement District Boards in the Trust Area. Ten responses were received, as follows. Please see detailed responses posted to the Islands 2050 webpage.

- **Harbour View Improvement District** **recommended conditional approval**, suggesting the need for clarity on how watershed ecosystems, freshwater networks, and groundwater recharge areas should be restored or rehabilitated (to what state in time?); and highlighting that desalination plants should be allowed to address specific needs, not prohibited outright.
- **North Salt Spring Waterworks District** **recommended conditional approval**, suggesting that desalination plants should be allowed as a means of providing safe potable water; that Trust Council should mandate the use of specific water conservation practices for new development; and that the finite capacity of water supplies should be explicitly noted as a factor affecting the availability, affordability, and suitability of housing options.
- **Piers Island** **expressed concerns** related to docks, seawalls, and GhG targets, and mentioned that it would welcome an in-person town hall to address questions from the community.
- **Trincomali Improvement District** **recommended conditional approval** and submitted a detailed review with specific comments and recommendations. Support was expressed for reconciliation, climate change, and housing sections. Suggestions were made regarding structure, language, and the need for a glossary. Comments revolved around potential impacts to water management, the need for inclusivity of residents, perceived expansions of the core mandate of the Trust, and the need for clearer rationale for certain new clauses.
- **Village Point Improvement District's** comments **expressed concerns** over the proposed desalination bans, tree cutting bylaws, density challenges for water consumption, septic filtering into aquifers, enforcement of freshwater standards, and rainwater harvesting challenges.

- **Gossip Island Improvement District** **did not recommend approval** and suggested that Islands Trust should focus its efforts on preventing the Southern Gulf Islands from becoming over-developed and supporting residents.
- **Scott Point Waterworks District** **did not recommend approval**, citing concerns regarding specific sections of Part 4 of the draft bylaw (desalination, tree-cutting, agriculture).
- **Georgina Improvement District** believed its **interests were unaffected** and welcomed any move toward supporting the preservation of water.
- **Mayne Island Improvement District** indicated it had **no comments at this time**.
- **Spanish Hills Improvement District** indicated it **would not submit any comments**.
- **Montague Improvement District** and **Secret Island Waterworks District** had advised that responses were forthcoming, but **no comments were received**.

### Referral Responses from Provincial Government Agencies

The draft Policy Statement Bylaw No. 183 was sent to 13 provincial government agencies. Responses were received from six agencies. Please see detailed responses posted to the Islands 2050 webpage.

- The **Ministry of Transportation and Infrastructure** (MOTI - Vancouver Island and South Coast) **recommended approval** of the draft bylaw and agreed with the proposed amendments. The **Provincial Approving Officer** at MOTI expressed **no objections** to the proposed draft bylaw, but listed questions around certain terms, the role of First Nations, and rainwater catchment.
- The **Ministry of Agriculture, Food and Fisheries** sent a letter **outlining concerns** related to some of the draft bylaw's potential impacts on agriculture and aquaculture. Ministry staff welcomed the opportunity for further discussion with Islands Trust staff.
- The **Agricultural Land Commission** (ALC) sent a letter with **comments intended to help ensure** that the Policy Statement is consistent with the purposes of the ALC Act, the Agricultural Land Reserve (ALR) General Regulation, the ALR Use Regulation, and decisions of the ALC. Some key areas flagged for further discussion between ALC staff and Islands Trust staff included Islands Trust advocacy for farming in the ALR to not adversely impact Indigenous food security and traditional harvesting practices, cultural heritage, or the environmental integrity of protected area networks
- **BC Ferries** **recommended conditional approval**, indicating some areas where policy flexibility would be desired for future BC Ferries infrastructure, with appropriate environmental offset and First Nations collaboration.
- The **Ministry of Energy, Mines and Petroleum Resources** indicated that their **interests were unaffected** by the draft bylaw.
- The **Ministry of Municipal Affairs and Housing** (Intergovernmental Relations and Planning Branch) **declined to comment** at this time as they were aware that first reading was postponed to allow for further public engagement. The Ministry has requested that the bylaw be referred after first reading.

### Referral Responses from Federal Government Agencies

The draft Policy Statement Bylaw No. 183 was sent to four federal government agencies. Only one response was received. Please see detailed response posted to the Islands 2050 webpage.

- **Environment and Climate Change Canada** (Canadian Wildlife Service – Pacific Region) **recommended approval** of the draft bylaw, noting appreciation for the attention to ecosystem stewardship and conservation, climate change, and reconciliation.