

From: Islands2050
Sent: Wednesday, September 10, 2025 4:12 PM
To: Islands2050
Subject: FW: Town Hall Questions

From: David Greer [REDACTED]
Sent: Friday, September 5, 2025 7:29 PM
To: Islands2050 <Islands2050@islandstrust.bc.ca>
Subject: Town Hall Questions

Thanks for the invitation to comment on the Islands Trust draft policy statement.

Mine is a general comment on how the draft policy statement addresses the protection of freshwater supplies and ecological values in the directive policies supporting Goal 4, specifically:

- 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.”

- Directive Policy 3.4.3. “Consider the aesthetic, environmental and social impacts of development.”

Goal 3 (“preserve and protect healthy and biodiverse ecosystems”) is supported by nine specific directive policies for the protection of biodiversity, ecological integrity and species at risk, consistent with the object of the Islands Trust Act to “preserve and protect the trust area and its unique amenities and environment”.

Goal 4 (“foster sustainable, inclusive, and resilient communities”) includes eight directive policies under the heading “managing growth and development”) that lack the specificity

of Goal 3, referring only in general terms to “environmental” values, as in directive policy 3.4.3 Impacts of Development: “consider the aesthetic, environmental and social impacts of development”.

Given that overdevelopment was the *raison d’être* for the creation of the Islands Trust Act, and given the emphasis on protection of ecological integrity in the rationale for the policy statement, I believe the provisions of the directive policies under Goal 4 are dangerously vague and prone to too loose interpretation and therefore require greater specificity.

The fact that “environment” can be understood as being an all-inclusive term is not an argument against using more specific language in the policy statement. At the time the Islands

Trust Act was made law, “environment” might have been understood to mean “nature” not only for its inherent ecological value but also as landscape and natural beauty. Awareness of the importance of ecological interactions, of threatened and endangered species, and of the value of wild land as an ecological corridor is much greater now than it was at the time the Act was passed, in addition to which ecosystems and species on the islands and contiguous ocean are today under greater threat as a result of interrelated factors including rapid population growth, the spread of competing invasive species, and climate change. It is also worth noting that earlier parts of the draft Policy Statement make repeated references to the importance of protecting ecological values vital to Indigenous cultures.

Finally, a prerequisite for sustainable communities is access to reliable sources of freshwater, a reality reflected in Directive Policy 3.3.5 in the draft policy statement: “identify and prioritize the preservation, protection and restoration of watershed ecosystems, freshwater sources, and groundwater recharge areas”. This need should be recognized as well in the directive policies for Managing Growth and Development under Goal 4 but is not mentioned there. This oversight may be remedied by amending those directive policies to include mention of freshwater supplies.

I suggest that, at a minimum, the following additions be made to the draft policy statement:

- Reword Directive Policy 3.4.3 as follows. “Impacts of Development. Consider the aesthetic, social and environmental impacts of development, including impacts on ecological integrity, biodiversity and freshwater sources.”
- Amend Directive Policy 3.4.2 by inserting after “minimize fragmentation of forest lands” the following words: “avoid adverse impacts to ecological integrity, biodiversity and freshwater sources”.

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