

January 18, 2026.

Islands Trust Council
Sent by email to islands2050@islandstrust.bc.ca

Dear Trust Council,

I am writing to express my serious concerns about, and opposition to, the draft Trust Policy Statement (TPS) as it is currently written. As a Trust Area resident who has followed the TPS review process closely since 2019, I also wish to convey my dismay and frustration with the way public engagement has been conducted for this draft.

In my view, the draft TPS is a shallow and poorly worded document, lacking scientific grounding, and reflecting a highly politicized attempt to enable increased development on the islands while paying only lip service to the Islands Trust's "preserve and protect" mandate.

This is evident in the Trust Council's reluctance to even include a definition of the word "*environment*." This omission appears to be another attempt by Council to reinterpret its mandate, following the egregious reinterpretation of "*unique amenities*" in September 2023. At that time, Council declared that a consensus had been reached—during a meeting closed to the public—that "unique amenities are broad-ranging and may include issues such as, but not limited to, housing, livelihoods, infrastructure, and tourism." The phrase "*but not limited to*" has effectively opened the door to treating almost anything as a "unique amenity," depending on the desired land-use outcome.

Many residents questioned and worried about how this reinterpretation of a core aspect of the Trust mandate would be reflected in the then-unreleased draft TPS. We now see the result: a blurred and obfuscated governing document that purports to be all things to all people, regardless of the health of the ecosystems that sustain life on the islands.

Justified by references to "changing times," this document proceeds as though the natural systems upon which our human and non-human communities depend are stable and resilient. Most troubling is the implicit assumption that growth can simply be *managed* rather than *limited*, as it is in urban communities. This claim is made without any supporting data—without even basic build-out reports to estimate future island populations under existing zoning. Public requests for this essential information, which would at least inform discussion and planning, have been ignored or rebuffed.

The Housing directives are led by a directive on "Suitable Locations for Additional Housing" that contains no reference to affordable housing secured by housing agreements but specifies "attainable" housing. What this might be we are not told, except that it will be "safe, secure and diverse". The same with a directive on "Clustered Small Dwelling Units" in "suitable areas", again with no mention of affordable and no explanation of what might determine suitability.

The public engagement process has been equally shallow, poorly planned, and poorly executed. Only one evening webinar was held, with questions required to be submitted in advance. The accompanying survey bundled numerous complex and consequential concepts together and asked respondents to indicate agreement or disagreement, leaving one feeling discouraged before even beginning. Despite following instructions, several hours of my own input were lost when I returned the next day to complete the survey.

Community information meetings on most islands were compressed into a single regular Local Trust Committee meeting, with Trust staff doing most of the talking and trustees often unable to answer questions effectively. Requests for additional meetings—where residents could meaningfully discuss the draft with one another—were refused on the basis of budget constraints. Yet such meetings could have

been held at minimal cost by locally elected trustees, providing residents with the opportunity to hear from and learn from one another.

This stands in stark contrast to the previous TPS consultation process in 2019, which included multiple public sessions—24 events across the Trust Area, including open houses, information booths, online input, and ferry engagement—and garnered responses from over 1,000 participants. That process resulted in the “What We Heard” report.

According to the Trust’s own July 2020 news release regarding that report, “Several strong themes emerged through the engagement process. Most participants expressed that they value having a connection to nature on the islands and support the Islands Trust preserve and protect mandate.” All of this was ultimately dismissed to satisfy a small number of well-funded voices, supported by some trustees, who opposed constraints on development, docks, and desalination systems. Informed comment from individuals and groups like nature conservancies and the Raincoast Foundation, with scientific, environmental impact knowledge was ignored and disparaged. The result was the abandonment of that draft and significant additional expense to produce the current document—an outcome that understandably has left many island residents discouraged and disengaged.

Climate change is barely addressed in the draft TPS, and rural character is scarcely mentioned. There is no meaningful context or history provided to explain the uniqueness and importance of the Islands Trust. The critical but poorly worded Goal 3, *“Preserve and Protect Healthy and Biodiverse Ecosystems,”* occupies only one page of directives, compared to two pages each devoted to *“Managing Growth and Development”* and *“Housing.”* (Notably, this goal should read “Preserve and Protect the Health of Ecosystems,” as the term *“biodiverse”* requires specificity.)

While the words *“identify”* and *“prioritize”* appear in several ecosystem directives, I have already heard trustees argue for the removal of *“prioritize”*—a change that could easily occur in a subsequent revision. The phrase *“consider cumulative effects”* appears only once in the entire draft, in a directive concerning marine docks, despite cumulative effects being central to many of the challenges facing the islands.

Similarly, the precautionary principle is almost entirely absent. It appears only as a guiding principle and is excluded from mandatory directives, effectively ensuring it can be disregarded in land-use decision-making.

This draft TPS is a shockingly poor document given the time and public funds spent on its development. It does not reflect the values expressed in the “What We Heard” report produced only a few years ago. I fear that, in its inadequacy, it will fail to guide trustees and communities toward the careful, informed land-use decisions required on our already stressed and fragile islands. Instead, it risks creating confusion, inviting inconsistent interpretation, and fostering unnecessary conflict within island communities.

Sincerely,

Jennifer Margison

Galiano Island

Attached:

What We Heard: Islands 2050 The Future of the Trust Area
Public Engagement Fall 2019