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Dear Trust Council,

Re: Draft Trust Policy Statement

This letter urges Trust Council to make major changes to the Draft Trust Policy Statement (TPS).

This draft TPS fails in its most important task to prioritize the preservation and protection of the natural environment and the unique amenities of the Trust islands—such as rural character. The current draft could allow inappropriate development that would, over time, erode the unique character and natural environment of these islands. This threat is underlined by the prediction that Vancouver's population is expected to surpass 4,000,000 by 2050. Similarly Victoria is predicted to surpass 485,000. Development pressures must be met by sound planning and protection of the unique ecosystems of these fragile islands.

Environment – The word “*environment*” appears throughout the draft but is not defined. The draft TPS had previously included a definition of environment but it was subsequently removed as being too broad in scope. A definition is still needed to make clear that the intention of the Trust Object was and still is largely focused on protecting the natural environment for the benefit of all British Columbians. There must be clarity on the scope of the term, or it would open to broad interpretation, potentially undermining the Act's objective.

Growth – The draft TPS proposes to “*manage*” growth rather than “*limit*” it. The TPS needs a directive clearly directed at limiting growth. The natural environment and rural nature of the islands cannot continue if growth is not limited. The Trust was established in 1974 to protect against unrestrained growth and development.

A directive is needed that requires each island to produce a [Build-out Report](#) based on current zoning and a [Growth Limits Report](#) setting out with the level of population it can sustainably support. These reports are needed to enhance protection of limited resources such as freshwater, native ecosystems and each island's rural character.

Enforcement of the TPS – Correct the introductory text in the draft that states that directives “should” be followed “where possible”. The TPS has advisory and directive policies. Directives are mandatory policies. However, the draft TPS is ambiguous in that while directives use the term “must”, the draft states elsewhere that directives “should” be followed “where possible”. TPS directives need to be clearly mandatory; otherwise, they in essence become advisory policies. All bylaws and Official Community Plans must be consistent with the TPS directives, as required by the Trust Act, with no exceptions.

Ecosystem Integrity – Identification of various ecosystems (forest, watershed, marine, etc.) is addressed in directives. However, the draft TPS does not include any specific direction on *how* they are to be protected. The directives should include requiring Development Permit Areas for that purpose.

Affordable Housing – Density increases should be only be granted for genuinely affordable and workforce housing, backed by binding housing agreements. These increases must be of a scale appropriate to each island and be contingent upon adequate sewage disposal capacity and sufficient water to serve both new and existing developments while protecting the natural environment.

Water Supply Knowledge – The TPS should include directives that require that local knowledge be considered (along with other information) when measuring the condition of island water supplies, and that importing of water and the increased occurrence of salt water intrusion into wells be monitored and reported.

Climate Change – Climate change is only briefly addressed in the draft TPS. It should be a major focus as the Trust Area is and will continue to be significantly impacted by aspects such as sea level rise and erosion, diminishing freshwater resources and wildfire risk.

Rural Character – The TPS should include stronger policies and specific mention to protect rural character as an important amenity of the Trust islands. “Rural” is mentioned in only one directive requiring the identification and protection of rural roadways.

Context – Unlike the current TPS, the draft includes little information in the introduction about the history and purpose of the Islands Trust. This information should be included as it is essential that the public understand the intention and value of the Trust Act. It is an admirable template for intelligent, sound, development parameters, taking into account the necessity of protecting fragile, complex ecosystems, increasingly at risk.

Wendy Hilliard

Your name and address here.