

From: Gerry Kristianson [REDACTED]
Sent: Thursday, January 29, 2026 3:00 PM
To: Islands2050
Subject: Comments with respect to the 2025 Islands Trust Draft Policy Statement

The Islands Trust Act stipulates that official community plans and bylaws must not be approved if they are contrary to or at variance with the Trust's Policy Statement. Since Improvement Districts are mentioned specifically in its opening section, the contents of the new Islands Trust Draft Policy Statement deserve the attention of Piers Islanders in the context of our two governing bodies, the Piers Island Improvement District and the formal owner of the center of the island, the Piers Island Association.

To help identify and protect local interests as the review process goes forward, I offer the following comments and highlighted questions as a long-time Piers Island owner and resident.

1. Issues related to Indigenous Reconciliation

Under the heading of "Guiding Principles" the draft policy statement says the Trust is to "Prioritize Environmental and Indigenous Cultural Heritage Protection" in all decision making. It should "take Guidance from the Precautionary Principle", and "strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and species and their habitats." As a "Reconciliation Principle", the Trust is to be informed by guidance from Indigenous Governing Bodies and Indigenous Knowledge Holders." As a "Cooperation Principle" it is to "Work Towards Collaborative Governance with Indigenous Governing Bodies".

What are the implications for the Piers Island Improvement District, the Piers Island Association and local residents if, to advance Reconciliation, all official community plan bylaws and other bylaws must provide a record of engagement with Indigenous Governing Bodies at the time of bylaw preparation?"

Will the Trust be providing guidance with respect to its expectations of local communities?

Under the heading "Land Back" in section 3.1.3, the policy statement would now say that the Trust must show that it has been able to "support opportunities to direct land to Indigenous Governing Bodies, including, but not limited to, amenity contributions in applications seeking additional development potential." As a goal to Preserve and Protect Indigenous Cultural Heritage and Culturally Significant Areas, Sites, and Species in each local planning area, the Trust is to be guided by "Indigenous Peoples, Indigenous Governing Bodies and Indigenous Knowledge Holders." The Trust is supposed to "minimize potential adverse impacts to Indigenous cultural heritage sites including, but not limited to, identified village sites, burial sites, camp sites, middens, cairns, petroglyphs, culturally modified trees, fish traps, clam gardens, pictographs, and registered, unregistered, or newly discovered archaeological sites." Community Plans should "Minimize potential adverse impacts to land-based harvesting and hunting areas used by Indigenous Peoples."

What are the implications for Piers Island residents and its local governing bodies if local trust committees are to “identify and prioritize protection of Indigenous harvesting areas on land and marine foreshores including, but not limited to, fish weirs, clam gardens, camas meadows, and other areas used for Indigenous hunting, fishing, trapping, and gathering of plants and medicines”.

How are Piers Islanders expected to “identify and pursue opportunities to improve access by Indigenous Peoples to marine and land-based harvesting and hunting areas and identify and prioritize protection of areas of importance for Indigenous cultural and spiritual practices”? How are Piers Islanders expected to “support restoration of culturally significant species and medicinal plants and ochre”? Under what process would we “support opportunities for cultural monitors to be present for ground-disturbing activities”?

2. Issues related to “ecosystem integrity” and “indigenous-led ecosystem management”

Under the heading of “Ecosystem Integrity”, local Trust committees are to “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.” Ecosystem Types are classified as cliff, freshwater, herbaceous, old and mature forest, riparian, wetland, and woodland.

What must be done on Piers Island to “identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forests, with a particular focus on the maintenance and restoration of their ecological integrity”? By what process does the Trust expect us to “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”?

As an “Advisory Policy” through engagement with Indigenous Governing Bodies the Trust wants to support opportunities for “Indigenous-led ecosystem management”. It wants to support Indigenous Governing Bodies in the establishment of “Indigenous Protected and Conserved Areas.”

Can the Trust provide guidance as to what must be done by Piers Islanders to implement this “advisory Policy”?

3. Shoreline Issues

Under the heading “Marine Shorelines and Nearshore Areas”, local committees are to Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands. With respect to “Islets and Small Islands”, local committees are to identify and prioritize their preservation, protection, and restoration. In the context of “Light Pollution” the proposed policy is to minimize light pollution through the application of “dark sky principles”.

Can the Trust advise us as to what Piers Islanders are expected to do to implement this policy?

4. Climate change issues

With a goal of fostering “Sustainable, Inclusive, and Resilient Communities” the Trust is to “support the preservation and protection of unique island character and aim to foster sustainable, inclusive, rural, and resilient island communities.” It is to minimize fragmentation of forest lands, avoid adverse impacts

to Indigenous cultural heritage and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.” The Trust is 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.”

What are the implications of this policy with respect to the wording of the Piers Island community plan and associated bylaws? Is the Trust contemplating changes in the current rules with respect to foreshore protection and the distance of structures from the sea?

5. Indigenous economic involvement

Under the heading “economic activities” the Trust is to 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”. The Trust is to “support economic development opportunities for Indigenous communities.”

In this context, does the Trust have expectations with respect to Piers Island?

6. Housing development issues

With respect to housing, the Trust is supposed to “Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable housing”. It must “Support a range of housing types and tenures to help meet the identified housing needs of the island community and local Indigenous communities.” In suitable areas, a policy permitting clusters of small dwelling units is seen as an alternative to conventional single-detached dwellings. Floor area and lot coverage limits for residential development are seen a way to minimize negative environmental impacts, including on land used for agricultural purposes. Also, with respect to housing, the proposal is to 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. The new policy document also suggests the need to develop and implement land use regulations to facilitate affordable, special needs, and other multi-unit residential development through a range of potential site configurations that “control form and character through development permit areas”.

Current Land Use policy on Piers Island specifies the nature of allowed buildings and their use. It does not allow short term rentals. Do our current rules with respect to guest cottages conflict with the new document’s suggestion that “small buildings” might be made available as housing. The policy document also purports to “support housing opportunities for Indigenous people in the Islands Trust Area”. Does the Trust consider this policy relevant to Piers Island?

7. Transportation networks

The new document calls on the Trust to 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. It is to protect rural roadways, including scenic and/or heritage roads”.

Can the Trusts advise how Piers Island is expected to conform with this "transportation" policy, or with the proposed policies on waste disposal?

8. Recreation issues

Under the heading of "recreation", the policy document wants to "Identify, preserve, protect, and support the restoration of natural heritage sites." It wants to identify appropriate locations for facilities for low-impact and active recreational activities. It wants to Identify and support safe public access and routes to community marinas, boat launches, and docks. It wants to Identify appropriate and safe small-craft anchorage public-access locations as well as appropriate locations for safe public access to public pedestrian, equestrian and bicycle trail systems. It wants to support the acquisition and protection of safe public access to and along marine shorelines and to "publicly owned lands".

In this context, what are the expectations of the Trust with respect to Piers Island?

As a "Directive Policy", the document says that the Trust wants to "Ensure that islands are self-sufficient in their supply of freshwater." Should the document be amended to reflect the fact that Piers Island has been formally exempted from this policy?

9. Forest management

The document states as an objective the value of maintaining "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".

Does the Trust agree that ownership of the center of the island and the Biscoe Beach area is consistent with this objective?

10. Agriculture

The draft document expresses support for agriculture that considers "downstream impacts, wildlife habitat, and adjacent properties" and minimizes "any adverse impacts of land uses from properties adjacent to agricultural lands." As an "advisory policy" the Trust wants to "Preserve, protect, and encourage sustainable farming and the sustainability of farming, especially "initiatives that advance food security...."

While the Agricultural Land Reserve does not apply to Piers Island, does the Trust agree that the PIA orchard, the farm at #139, and the community garden at #135 are all consistent with these objectives?

11. Soil protection and sea level issues

As directive policies with respect to "soil and fill" the Trust wants to "Foster the preservation, protection, and restoration of soils in the Islands Trust Area" and "Prohibit alteration, removal or excavation of soil or fill from all identified archaeological sites, including middens or foreshore areas identified as culturally significant areas." As directive policies with respect to marine shorelands the Trust wants to formalize setbacks from the sea that "Incorporate current and anticipated impacts of sea level rise and storm surge". It wants "appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by the federal and provincial governments." It wants to "Prioritize and foster soft shoreline approaches, such as those identified by the "Green Shores"

program, to set requirements for shoreline preservation, and to mitigate erosion of shoreline and foreshore cultural heritage sites.”

In the context of the new document, what are the expectations of the Trust with respect to past attempts to impose on Piers the Salt Spring Island sand and gravel bylaw? What are the implications for Piers of references to “soft” shoreline protection and proposals to increase the required distance between buildings and the water in the context of sea level rise?

12. Moorage, boats and docks

With respect to vessel moorage, the new draft document wants to “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” It wants to “Identify requirements for the location, size, and nature of marinas that are compatible with the preservation and protection of the Trust Area and its unique amenities and environment.” It suggests the need to “Identify opportunities for the sharing of coastal facilities such as docks, wharves, floats, jetties, boat houses, board walks, and causeways.” It says we must “Consider the cumulative effects of docks, and limit or prohibit new docks in areas identified as culturally significant by Indigenous Governing Bodies, in areas that provide critical habitat for species at risk, and in areas of recreational significance.” It wants to “Limit or prohibit the construction or installation of breakwaters, groynes, rock weirs and jetties in marine areas that are not zoned for group wharfage, marine commercial or industrial use, or ferry terminals.”

How does the Trust propose to apply these new rules to our water-access-only island?

Concluding Comments

With respect to implementation, the Trust’s supporting documentation says that “As soon as practicable after the initiation of a Policy Statement amendment process, Islands Trust Council should adopt a communications and engagement plan appropriate to the scope and scale of the amendment project. Proposed Policy Statement amendments must be referred to regional district boards in the Islands Trust Area and should be referred to Indigenous Governing Bodies”.

Having given the bylaw first reading on July 29, the Trust Council has launched six months of public engagement. Community members, Indigenous Governing Bodies, local organizations, and government partners are invited to provide feedback on the draft and its five main goals. So far the Trust has not provided Piers Islanders a local opportunity for discussion of the subject.

I also note that in the definitions section of the document Piers Islanders apparently fall into the category of being considered “colonizers”. We are described as people who “come to a new place or country and steal the land and resources from Indigenous peoples, and develop a set of laws and public processes that are designed to violate the human rights of the Indigenous peoples, violently suppress the governance, legal, social, and cultural structures of Indigenous peoples, and force Indigenous peoples to conform to the structures of the colonial state.”

I do not consider this a fair or helpful description of me and my neighbors.

Sincerely,

Gerry Kristianson

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Piers Island