

**From:** Gilian Dusting [REDACTED]  
**Sent:** Friday, January 30, 2026 5:35 PM  
**To:** Kim Stockdill <[kstockdill@islandstrust.bc.ca](mailto:kstockdill@islandstrust.bc.ca)>; Emily Bryant <[ebryant@islandstrust.bc.ca](mailto:ebryant@islandstrust.bc.ca)>  
**Cc:** Art Moses [REDACTED] Danica Berginc [REDACTED] Gerald Longson [REDACTED]  
[REDACTED] Jann Helssen [REDACTED] Jennifer Margison [REDACTED]  
[REDACTED] Karen Harris [REDACTED] Carly Bilney [REDACTED]  
**Subject:** APC Response to GL-2025-062

Hello Planner Stockdill:

FW: APC Response to GL-2025-062

Please find attached our response from the Galiano Advisory Planning Commission to Referral GL-2025-062 from our Local Trust Committee, regarding a review of the proposed Island Trust Policy Statement.

We thank the LTC for inviting our comments and recommendations on this important document and hope that the content of our report will be helpful to them and the Trust Council.

I would like to thank my fellow commissioners for their thoughtful contributions and many hours of diligent work on this report. And together we thank Carly Bilney for her steady support throughout the process and for her reliably warm smile over Zoom.

Respectfully submitted,

Gilian Dusting (Chair) and fellow APC commissioners

Gilian Dusting



**Galiano Island Advisory Planning Commission Referral Report  
in response to GL-2025-062 regarding  
File No: Islands Trust Policy Statement**

**January 30th, 2026**

---

GL-2025-062: It was Moved and Seconded, that Galiano Island Local Trust Committee send the Islands Trust Policy Statement to the Advisory Planning Commission for comment. The Galiano Island Advisory Planning Commission makes the following comments and recommendations to the Local Trust Committee in response to GL-2025-062.

---

## **Background**

The Galiano Advisory Planning Commission (APC) received referral GL-2025-062 regarding the Islands Trust Policy Statement (TPS) from the Galiano Local Trust Committee (LTC) on December 16, 2025. The APC met for 3 two-hour meetings, between January 6th and January 27th 2025, to develop the following response to the referral.

Due to seasonal holidays, the APC could not convene a meeting until January 6, 2026. A second meeting was prescheduled in order to obtain a quorum before several commissioners departed for holidays. Despite extremely tight timelines, the commissioners understood the importance of creating an effective TPS. Therefore, in addition to three scheduled meetings, commissioners devoted many additional hours to consolidate the input into a report that we hope will be helpful to the LTC.

After February 9, 2026, the APC will not have a quorum until commissioners return mid-March. The APC regrets that the LTC did not forward the referral earlier, or in place of the OCP referral, because the January 30 deadline did not allow sufficient time for fulsome review of the 35-page draft TPS document.

Given the time constraints, the LTC focused its review on the directive policies. This approach reflects guidance from the Islands Trust Senior Policy Advisor that only directive policies will be used by LTCs to determine whether bylaws are consistent with the TPS, although some guiding principles and advisory policies are also referenced within. Note that the APC has recommended that some guiding principles and advisory policies become directive policies to strengthen the authority of the TPS. These recommended new directives are identified with the word **NEW** in the text.

While Trust staff have implemented a community consultation strategy, the only in-person opportunity for Galiano residents to engage to date was a single community information meeting held in conjunction with an afternoon LTC meeting. As a result of daytime scheduling, many residents were unable to attend. Additional opportunities for in-person engagement would better support the objective of meaningful public consultation.

The APC respectfully recommends that the LTC host an additional, well publicized, community information meeting, separate from a Local Trust Committee meeting, to provide islanders with a focused opportunity to learn about the draft policy and to discuss its implications with one another, Trust staff, and trustees. To this end, we suggest that the LTC request an extension of the public consultation period to

ensure that Galiano and other island communities have adequate time to become informed and to engage in thoughtful discussion on this important document.

The APC also identified a need for clearer introductory material at the beginning of the Trust Policy Statement to assist readers in understanding the historical context, purpose, and mandate of the Islands Trust. An abridged and updated version of the preamble from the current Trust Policy Statement would be beneficial.

In addition, during its page-by-page review of the draft TPS, the APC determined that a side-by-side comparison of the draft and current Trust Policy Statements would support both commissioners and Islands Trust communities in their review. For reference, the Friends of the Gulf Islands Society has prepared a comparison chart titled, [Analysis and Recommendations on the Proposed New Draft Trust Policy Statement](#).

Because of our time constraints it was difficult to thoroughly analyze the document. However, we did study TPS review work done by other community groups and agreed to recommend that the LTC also carefully review these insightful documents. Reports by the Galiano Conservancy, a group of Galiano residents working with the Conservancy, and Friends of the Gulf Island Society are included as hyperlinks for the LTC's reference. (Please note that the Conservancy report link was not available at our deadline. We will update our report with the link and forward it to the LTC as soon as it is online.)

---

## **Key Comments and Recommendations**

### **Three Priorities**

The following three priorities should be highlighted throughout the TPS:

- First Nations Reconciliation;
- Climate Change Mitigation and Adaptation;
  - The APC recommends that Climate Change Mitigation and Adaptation be a specific goal with specific directives.
- Sustainability of Critical Resources, specifically those related to the natural environment.

### **Consultation**

- We believe that, despite the consultation period, many islanders are unaware of the draft TPS and its important role. Therefore, we recommend that the LTC host an additional community information meeting, separate from a Local Trust Committee meeting, to provide islanders with a focused opportunity to learn about the draft policy and to discuss its implications with one another, Trust staff, and trustees.
- We recommend either an extension of the public consultation period, or a second round of consultation once the draft TPS has been amended to incorporate the current feedback.
- We believe that the recommendations we and others have made will require significant changes to the draft TPS and will require communication of those changes back to the community before proceeding with the approval process.

### **Growth and Development**

- The Trust was established in 1974 to protect against unrestrained growth and development. The draft TPS proposes to "manage" growth rather than "limit" it. The natural environment and the rural character of the islands cannot continue if growth is not limited.

- The policy statement should be data-driven and require each island to produce a build-out report based on current zoning and a growth limits report that identifies the level of population it can sustainably support.
- The APC recommends adding two directives to Goal 4 (Foster Sustainable, Inclusive, and Resilient Communities) that require establishment and adherence to density limits. See Goal 4 discussion below. Note also that definitions for the following words should be added to the glossary: *“land use density”* and *“carrying capacity”*.

## **Housing**

- The APC recommends that any increases in housing density be targeted only for affordable and affordable workforce housing, secured by housing agreements between the provider/developer and the Local Trust Committee. See further comments in Goal 4 Housing.

## **Cumulative Effects**

- A science-based understanding of cumulative effects is the key to the “preserve and protect” mandate. This important planning principle is not adequately incorporated in the draft TPS as it only appears in one directive for Marine Docks. Cumulative effects should be specifically referenced as a directive in Goal 3. See the APC recommendations under Goal 3 below.

## **Language**

- Precision and clarity of language is extremely important. With multiple levels of review, there is a real danger that science-based content is watered down or overridden by “group think” and/or non-scientific opinions.
- The APC will note examples of ambiguous language throughout our report, but particularly egregious ones include the word *“environment”*, which needs to be defined as either *“natural environment”* or *“built environment”*. As well, *“should”*, *“could”* and *“must”* are used inconsistently. Only *“must”* is an imperative that requires action, adherence or compliance. See Glossary section for more examples.
- The draft Trust Policy Statement would benefit from an explicit statement clarifying that the Glossary is intended to define terms used within the document. It is critical that the main document links to, and is supported by, precise glossary definitions. The APC recommends that the role of the glossary be established and defined in 1.4 - Purpose and Structure of the Policy Statement.

## **Cost**

- Lack of precise language can lead to costly changes in the TPS, which are ultimately financed by Islands’ taxpayers. Section 4.2 (Policy Statement Amendments) contains the only mention of cost related to changes made to the TPS. Although it has been suggested that updating the TPS would be an ongoing project, the use of clear, unambiguous language now will result in a solid, resilient and more effective foundational Trust Policy Statement; one that requires fewer changes and is therefore less costly to maintain.

## **General**

- Some directives in Goal 4 (Foster Sustainable, Inclusive, and Resilient Communities) tend to undermine Goal 3 (Preserve and Protect Healthy and Biodiverse Ecosystems). Goal 3 is critical to the Trust mandate to preserve and protect, yet Goal 4 seems to be prioritized (e.g. Goal 3 is little more than one page in the draft, while Goal 4 stretches over five pages). The APC

questioned whether the balance between the two goals is off. Please see these sections for more observations and recommendations.

- The APC observes that there is only one reference to Development Permit Areas (DPAs) in the draft TPS and recommends the Trust Council incorporate the use of DPAs as a guiding tool to protect sensitive areas. Directives should require the creation of Development Permit Areas that provide specific direction on how various sensitive ecosystems are protected.
- Many directive policies use the word “identify...”. As highlighted in our OCP Review report, the APC notes that many of the Galiano maps are outdated or incorrect and require updating in order to identify, and therefore protect, these sensitive areas.

---

## **Trust Policy Statement Analysis and Recommendations**

The APC respectfully offers the following comments and recommendations. We address sections of the draft TPS in the order that they appear in the document. Due to lack of time we were unable to review every section of the report in detail. Hence in this report we have omitted those sections that, unfortunately, did not receive our attention.

### **PART 1 – THE ISLANDS TRUST ACT**

We believe the entire Islands Trust should be responsible for protecting places of natural and cultural significance, not only "through the Islands Trust Conservancy." We recommend retaining the 2023 draft TPS language as follows: "The Act established the Islands Trust as a special-purpose government agency equipped with a suite of land use planning powers and a conservation-oriented mandate to preserve and protect the region in cooperation with others. This unique government mandate was defined in Section 3 of the Islands Trust Act and is commonly referred to as the "Islands Trust Object."

#### **1.4 – Purpose and Structure of the Policy Statement**

Discussion was held about how the “silent voices of island ecosystems, species at risk, and future generations” should be prioritized. We recommend that this be listed higher in the paragraph rather than the last line.

The Islands Trust Senior Policy Advisor advised that only Directive Policies will be used by LTCs to determine whether bylaws are consistent with the TPS. Many of the directive policies are ambiguous, especially where it is suggested “they **should** be directly addressed **where possible**” on page 7 of the draft. The role of directive policies is to mandate specific action or behaviour. Without clear direction, the result is a weak policy statement that allows various interpretations and lacks rigor.

### **PART 2 – GUIDING PRINCIPLES**

#### **2.1 – General Guiding Principles**

The APC recommends including the word “*priorities*” to read, “In its efforts to carry out the Islands Trust Object, Islands Trust Council commits to the following set of shared principles **and priorities** to guide daily planning and decision making by Islands Trust Council, Islands Trust Executive Committee, local trust committees and island municipalities:”.

### **Trust Council's Guiding Principles**

**2.1.2 Prioritize Environmental and Indigenous Cultural Heritage Protection** – The APC suggests creating two Guiding Principles from 2.1.2. One should be entitled “*Prioritize Protection of the Natural Environment*” and the other should be “*Prioritize Indigenous Cultural Heritage Protection*”. Indigenous Cultural Heritage should be distinct from Protection of the Natural Environment – both are important, but not the same.

**2.1.3 Limit the Rate and Scale of Development** – This is a critical guiding principle to “preserve and protect the Trust Area”. It should include the word “growth” to read “Limit the Rate and Scale of **Growth** and Development” and, as is referenced throughout this document, “environment” should be identified as “*natural* environment”.

In addition, this Guiding Principle must be supported/enacted by strong, specifically worded directives in Goal 3 (Preserve and Protect Healthy and Biodiverse Ecosystems) and Goal 4 (Foster Sustainable, Inclusive and Resilient Communities). Also critical to this guiding principle and its associated directive policies, is a clear articulation of how growth limits are defined/set, measured and monitored. See associated comments in the Goals 3 & 4 sections.

**2.1.5 Take Guidance from the Precautionary Principle** – Adjust the title to read “*Follow* the Precautionary Principle” and the text to say “*natural* environment”. In addition to belonging in this section as a guiding principle, “Follow the Precautionary Principle” should be a directive under Ecosystem Integrity 3.3.1 - 3.3.9.

**2.1.6 Account for Cumulative Effects** – Science-based understanding of cumulative effects is the key to the “preserve and protect” mandate. To that end, the principle should be re-worded as follows: “**Prioritize** accounting for cumulative effects of existing and proposed development to avoid detrimental effects on **ecosystems**, watersheds, **freshwater** supplies, culturally sensitive areas and cultural heritage sites, and species and their habitats.” This important planning principle is not adequately incorporated in the draft TPS. It only appears in one directive for Marine Docks. It also should be specifically referenced as a directive in both Goals 3 & 4.

**2.1.7 Foster Informed, Open and Transparent Decision Making** – Incorporate a broad range of sources in its decision-making processes, including Indigenous Knowledge, institutional knowledge, local community knowledge and science.

**NEW – 2.1.8 Foster Public Participation in Decision Making** – Foster public participation in all government decision-making processes and provide opportunities for public input in establishing OCPs and regulatory bylaws.

### **2.2 – Reconciliation Principles**

The APC welcomes the recognition in the draft TPS that, in the spirit of Reconciliation, now is the time to move forward with meaningful engagement with area First Nations, the original stewards of this area. However, we are surprised that given Trust Council’s professed commitment to Reconciliation in the opening of the draft TPS, the Directive Policies under “Goal 1 Advance Reconciliation” are so limited. The only directive is a vaguely worded direction to “engage with Indigenous Governing Bodies...”. Neither the Directive Policies nor the Advisory Policies under Goal 1 contain any references to co-management or

co-governance, even though both concepts are mentioned specifically in the opening section “1. 3 – Indigenous Inherent Rights Acknowledgement”.

In the interest of ensuring direct Indigenous representation in decisions of the Islands Trust we recommend that the Trust advocate to the Provincial Government that it appoint a First Nation representative to the Trust Council.

Beyond these observations, it is difficult for us to make further recommendations because the APC has no Indigenous representation at our table, which makes it hard for us to know how First Nations would approach engagement, co-management or co-governance. We can't recommend specific changes to these draft policies in Goal 1, other than believing that they need to go further and be more specific if the new Trust Policy Statement is to truly “Advance Reconciliation”.

### **2.3 – Cooperation Principles**

#### **Trust Council's Cooperation Principles**

**2.3.4 Demonstrate Strategic Inter-Agency Coordination** – Replace the words “work towards establishing” with “demonstrate”.

**2.3.5 Demonstrate Accessible and Inclusive Public Communications and Engagement** – Replace the words “work towards” with “demonstrate”.

## **PART 3 – GOALS AND POLICIES**

One member recommends, in order to emphasize the overriding importance of protecting the biodiversity of the Islands Trust area, elevating current Goal 3 - Preserve and Protect Healthy and Biodiverse Ecosystems to Goal 1. As noted in the Acknowledgement text at the beginning of the draft TPS, “Islands Trust Council acknowledges that a healthy environment is essential for Indigenous Peoples to be able to exercise their inherent and treaty rights.”

### **GOAL 1 – Advance Reconciliation**

Please see APC comments under 2.2 – Reconciliation Principles

### **GOAL 2 – Preserve and Protect Indigenous Cultural Heritage and Culturally Significant Areas, Site, and Species**

Please see APC comments under 2.2 – Reconciliation Principles

### **GOAL 3 – Preserve and Protect Healthy and Biodiverse Ecosystems**

We suggest rewording Goal 3 to read: “Preserve and Protect the **Health and Diversity of Ecosystems**”. Currently, it could be interpreted to only protect the ecosystems that are healthy, and not to protect all ecosystems and in order to facilitate health and diversity.

The first paragraph could also be re-worded: “The policies in this section aim to identify and protect ecosystem types and characteristics to safeguard biodiversity and promote resilience to climate change **and protect the ability of ecosystems to sequester and store carbon for climate change mitigation**”

The APC observes that there is only one reference to Development Permit Areas (DPAs) in the draft TPS and recommends the Trust Council incorporate the use of DPAs as a guiding tool to protect sensitive

areas. Directives should require the creation of Development Permit Areas that provide specific direction on how various sensitive ecosystems are protected.

#### **Directive Policies – Ecosystem Integrity**

**3.3.3 Forest Ecosystems** – For clarity and completeness, the following names specific ecosystems to be protected: “Identify and protect unfragmented forest ecosystems, ***the remaining stands of relatively undisturbed Coastal Douglas-fir, Western Red Cedar, Arbutus, Garry Oak and Coastal Western Hemlock*** and their associated ecosystems within their local planning areas from potentially adverse impacts of growth, development and land-use.” This suggested text uses wording from Directive 3.2.2 in the current TPS that specifically mentions “the potentially adverse impacts of growth, development and land-use.”

**3.3.4 Coastal Oak and Prairie Ecosystem** – The APC wondered why there is specific mention of these ecosystems when many other ecosystems, which also require protection, are omitted. See 3.3.3 above.

**3.3.5 Watershed Ecosystems** – Rework to read as follows: “Identify and prioritize the preservation, protection and restoration of watershed ecosystems, freshwater sources, ***wetlands and riparian areas, and*** groundwater recharge areas ***and prevent any further loss and degradation.***”

**3.3.6 Marine Shoreline and Nearshore Areas** – There are coastal ecosystems beyond the ones mentioned here. Add “***and other marine ecosystems.***”

**NEW – 2.1.5 Follow the Precautionary Principle** – As noted in Part Two Trust Council’s Guiding Principles above, we recommend the re-worded “Follow the Precautionary Principle” be included as an Ecosystem Integrity Directive Policy.

**NEW – 2.1.6 Account for Cumulative Effects** – As noted in Part Two Trust Council’s Guiding Principles above, we recommend “Account for Cumulative Effects” be included as an Ecosystem Integrity Directive Policy. This new directive should be re-worded as follows: “**Prioritize** accounting for cumulative effects of existing and proposed development to avoid detrimental effects on ***ecosystems, watersheds, freshwater*** supplies, culturally sensitive areas and cultural heritage sites, and species and their habitats.”

#### **GOAL 4 – Foster Sustainable, Inclusive, and Resilient Communities**

Adjust the title to read: “Foster Sustainable, Inclusive, and Resilient ***Rural*** Communities”.

The policy statement should include reference to accessibility for people with disabilities, which could be added to Goal 4.

#### **Directive Policies – Managing Growth and Development**

The draft TPS proposes to “manage” growth rather than “limit” it. The natural environment and the rural character of the islands cannot continue if growth is not limited. The Trust was established in 1974 to protect against unrestrained growth and development. As such, the APC recommends

omitting the word “managing” in the the title of this Directive Policy section to read: “Growth and Development”.

**3.4.2 Growth Management** – Should be changed to “***Limit*** Growth and Development”. The accompanying text should be changed to: “***Limit*** community growth and its associated impacts by ***establishing appropriate density and population limits and*** by directing residential, commercial and industrial development into suitable locations to ***preserve and protect the unique amenities and the natural environment.***” Note: “*Suitable*” requires a definition in the Glossary.

**3.4.5 Climate Change Mitigation and Adaptation** – Goal 3 is to promote resilience to climate change, yet the directive related to climate change mitigation and adaptation is under Goal 4 and it is too general. As noted earlier, given the accelerating climate crisis, we recommend making Climate Change Mitigation and Adaptation an additional separate goal with accompanying directives (see New Goal 6 below). Climate change was identified as a key issue in past public engagement and the Trust declared a climate emergency in 2019.

**3.4.8 Community Heritage Sites** – Restore language similar to that in the current TPS sections 5.6.1 and 5.6.2 “Identify sites of natural or human heritage that are of natural, historic, cultural, aesthetic, educational or scientific heritage to be preserved and protected.”

**NEW – 3.4.9 Existing Development Potential** – This Advisory Policy should become a directive policy.

**NEW** – Directive Policy 5.2.5 in the current TPS should be added to this list of directives. It reads: “Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address means for achieving efficient use of the land base without exceeding any density limits defined in their official community plans.” This is critical to the Islands Trust Object.

#### **Directive Policies – Housing**

The APC is concerned that this section of Goal 4 undermines protections for the natural environment, ecosystems and unique amenities as set out under Goal 3. The section should explicitly encourage the development of affordable housing and affordable workforce housing, not enable increases in density for any housing that would inevitably find its way onto the unaffordable private market. Density increases for market housing will only increase land values and demands on the Islands limited water and other natural resources. The APC recommends that any increases in housing density be targeted only for affordable and affordable workforce housing, secured by housing agreements between the provider/developer and the Local Trust Committee.

The title should read “***Affordable*** Housing” and note that the Glossary requires a definition of “*affordable housing*”.

**3.4.11 Suitable Locations for Additional Housing** – This should be eliminated or changed to simply “identify suitable locations that could support increased density for the development of ***affordable housing and affordable workforce housing***”. Note the recommended deletion of

the word “attainable” housing; if reference to “attainable housing” remains in the TPS, these words must be included and defined in the glossary.

**3.4.12 Housing Diversity** – This should read “support a range of housing types and tenures to help meet the identified **affordable** housing needs of the island community and local Indigenous communities that **also respect the natural environment**.

**3.4.13 Clustered Small Dwelling Units** – Remove this directive. There is no reference to affordable housing and workforce housing or housing agreements. It should be up to each island to determine how best to provide affordable housing. Clustering existing densities on a lot can be important to reduce clearing of trees, preserve habitat for wildlife and to minimize other environmental impacts, but there are a number of other options available.

**3.4.14 Floor Area and Lot Coverage Limits** – Delete “Floor Area and”, so the directive is titled “Lot Coverage Limits”. Amend the directive to read, “Set lot coverage limits and establish a maximum dwelling size to minimize negative effects on the natural environment”.

Floor area and floor area ratios are planning and development tools used to establish density entitlements in urban and suburban areas. They are not appropriate in rural communities and especially in the Trust Area with a legislative mandate to preserve and protect the natural environment.

#### **Advisory Policies – Housing**

**3.4.19 Natural Building Materials** – This advisory policy would benefit from a more specific definition of “natural building materials”. It could be clarified to encourage “energy efficient” building that has the least possible impact on the natural environment. A more descriptive title would be “Natural Building Materials **and Renewable Energy**” with possible new accompanying text: “Encourage construction of buildings and structures using natural building materials and **renewable energy sources such as heat pumps, solar and wind power.**”

#### **Advisory Policies – Transportation**

Add as an advisory policy from the current TPS, “No island in the Trust Area should be connected to Vancouver Island, the mainland or another island by a bridge or tunnel, notwithstanding the existing bridge between North and South Pender Islands”

#### **Directive Policies – Waste, Emissions and Pollutants**

**3.4.25 Disposal of Waste** – Re-word to include this directive from the current TPS: “Neither hazardous nor industrial waste should be disposed of in the Trust Area.” This, or an additional directive, should also address disposal, recycling and/or reuse of new and emerging technologies such as electric cars, batteries etc.

**3.4.26 Wastewater Disposal Systems** – We suggest rewording this directive policy to emphasize prevention and to include freshwater sources as follows: “Establish requirements for the location and siting of new wastewater disposal systems **to prevent negative impacts** on the Trust Area and its unique amenities and environment with a focus on Indigenous Peoples’ cultural heritage sites, **the marine environment and freshwater sources.**”

## **GOAL 5 – Foster Sustainable Stewardship of Lands and Waters**

In the title of Goal 5, consider a stronger word than “Foster” such as “Uphold”, which would provide clearer direction.

In the preamble to Goal 5, emphasize the critical nature of freshwater by replacing “important” with “essential” as follows: “ITC recognizes that sustainable use of lands and waters in the IT Area is **essential** to the long-term well-being and resilience of ecosystems in the Islands Trust Area and the communities that depend on them.”

### **Directive Policies – Freshwater**

Although there are checks and balances in place to monitor the impact on water resources of development on the islands, they are inadequate, as are the draft directives. The APC recommends that each Freshwater Directive is prefaced with: “When considering zoning changes or increases in density, ensure that...”

**3.5.1 Freshwater Sustainability** – Re-word to the following: “Ensure that neither the density, nor intensity of land use is increased **in neighbourhoods and/or** in watersheds ...” as it is unclear how watersheds will be assessed regarding adequate and sustainable quality and quantity of freshwater.

**3.5.3 Freshwater Self-Sufficiency** – This directive fails to acknowledge that many islands are not self-sufficient in water. The policy should read: “Identify islands that are not self-sufficient in water; monitor and report on the importing of freshwater, well failures due to overuse and saltwater-intrusion; and take action to minimize additional dependence on off-island water”.

**NEW** – All three Freshwater Advisory Policies should become Directives.

**3.5.7 Freshwater Storage** – In addition to becoming a directive, freshwater storage should be required in all Trust areas, not only where the quality or quantity of groundwater is likely to be inadequate or unsustainable.

### **Directive Policies – Forest Lands**

**3.5.10 Forest Lands and Wildfire Risk** – Wildfire risk will be reduced by limiting areas of interface between development and forest. We suggest adding the following wording to this directive: “Assess and limit additional wildland urban interface and intermix.”

## **NEW – Goal 6 – Climate Change Mitigation and Adaptation**

As one of the key recommendations of this report, the APC believes Climate Change, Mitigation and Adaptation should be one of the main goals in the new TPS. Climate change is the largest threat to well-being on our planet and should be treated in the TPS as a separate goal with clear directives. The Trust declared a climate emergency in 2019 and climate change and its adverse effects continue to accelerate. Yet, climate change is only mentioned in directive 3.4.5 and otherwise there is little focus on it in the draft TPS. Climate change is identified as one of the 3 pillars of the January 2021 Policy Directions: Visual Policy analysis and in the Public Engagement Phase II document. As well, Directives suggested in the Islands 2050 - Fact Sheet on Climate Change are missing here.

## **PART 4 – IMPLEMENTATION**

### **4.1 – Policy Statement Implementation**

Policy 4.1 states in part, “Islands Trust Council, Islands Trust Executive Committee and LTCs are expected to take *general policy direction* from the Policy Statement...” This statement should read: “Islands Trust Council, Islands Trust Executive Committee and LTCs **must** take policy direction from the Policy Statement...”

The APC recommends stronger language than “general direction” to limit opportunity for avoidance or work-arounds. Directives should be requirements, to ensure that policies are respected. All islands in the Trust Area should have OCPs and Bylaws consistent with these directives.

### **4.2 – Policy Statement Amendments**

This section contains the only mention of cost if changes are to be made to the policy statement. Adequate budget must be allotted to updating the TPS. However, the Islands Trust needs to ensure that the new TPS is written with precise unambiguous language to help reduce the necessity of costly future changes that will ultimately be funded by Trust area taxpayers. See our comments regarding cost in Key Comments and Recommendations above.

## **GLOSSARY OF TERMS**

The draft Trust Policy Statement will be a clearer, more consistent and more effective tool if the Glossary is explicitly identified as defining the terms referenced throughout the document. The APC recommends that the role of the Glossary be established in 1.4 - Purpose and Structure of the Policy Statement.

In addition, the effectiveness of the Glossary could be further strengthened through refinement of several definitions to improve precision and completeness, as well as through the inclusion of additional terms used elsewhere in the document.

In the short time we had to review the draft statement, the APC noted the following glossary terms that require improved definition or inclusion. This is not a comprehensive list. We recommend a thorough review of the glossary and an acknowledgement in the Purpose and Structure of the Policy Statement of the critical role of the glossary. When reviewing the Glossary, the APC also recommends that the LTC references the thorough list of definitions provided by the Galiano Conservancy, the group of Galiano residents working with the Conservancy, and the Friends of the Gulf Islands Society. (As noted above, the Conservancy report link was not available at our deadline. We will update our report with the link and forward it to the LTC as soon as it is online.)

**Affordable Housing** – Provide a clear definition.

**Attainable Housing** – This term should be deleted from the draft TPS. It is a nebulous term with no actionable definition.

**Built Environment** – Provide a clear definition.

**Carrying Capacity** – Provide a clear definition.

**Ecosystem** – Provide a clear definition.

**Environment** – Provide a clear definition.

As noted throughout this document, “environment” should be replaced and defined as “natural environment”, or where applicable, “built environment”.

**Land Use Density and Intensity** – Provide a clear definition.

The Glossary does not actually define land use density, but instead describes a way of “managing” density. Density could be defined as, “Density is regulated through zoning that states the number of residences, or businesses allowed on a particular property”.

**Local Knowledge** – Provide a clear definition.

**Natural Building Materials** – Provide a clear definition.

**Natural Environment** – Provide a clear definition.

**Natural Heritage Sites** – Provide a clear definition.

A clear definition should include the full range of the Trust Area natural heritage sites including the ecosystems and habitats critical for all species (including, but not restricted to, at-risk species).

**Population Density** – Provide a clear definition.

**Residential Development** – Provide a clear definition.

**Unique Amenities** – Provide a clear definition.

---

## **Conclusion**

In closing, the APC strongly encourages the LTC to advance the recommendations in our report. In addition, we hope the LTC will consider carefully the thoughtful suggestions made by other community members in reports such as that of the Galiano Conservancy, the group of Galiano residents working with the Conservancy, and the Friends of the Gulf Islands Society.

As we noted in the background to this report, despite the various communications channels utilized, we believe the public consultation was unsuccessful in reaching the majority of people who live and work in the Island Trust Area. Therefore, we recommend either an extension of the public consultation period, and/or a second round of consultation once the draft TPS has been amended to incorporate the current feedback.

We believe that the recommendations made in ours and other reports, require significant changes to the draft TPS and as such, will require communication of those changes back to the community before proceeding with the approval process.

We caution the LTC that this is not a process to rush. We are facing the acceleration of climate change, population and development pressures from the neighbouring urban centres, and the ripple effects of larger socio-economic and political uncertainty. At the same time there is a pressing need to achieve Reconciliation with Indigenous people and to facilitate the creation of more affordable housing. This important guiding document is our opportunity to help weather that change and uncertainty; and to ensure that the waters and islands of the Islands Trust Area are protected from the adverse effects of unrestrained growth and development.

Respectfully submitted by:

Gilian Dusting, *Chair*  
Art Moses, *Vice-Chair*  
Danica Berginc, *Member*  
Jann Helssen, *Member*  
Gerry Longson, *Member*  
Jennifer Margison, *Member*

Karen Harris, Absent (away on vacation)