

From: Jorge and Maria Carmita Menyhart [REDACTED]
Sent: Friday, January 30, 2026 8:05 PM
To: Islands2050; Executive Admin
Cc: Botterell.MLA, Rob; christine.boyle.mla@leg.bc.ca; lisagauvreau@gmail.com; Ben Mabberley; Timothy Peterson
Subject: Islands Trust 2050 Policy Feedback
Attachments: Comments Islands 2050.docx

Please find attached my letter for the Trust Council and Minister Christine Boyle outlining my concerns regarding the draft TPS.

Thank you,

Maria Carmita de Menyhart
[REDACTED]

Galiano Island

January 30, 2026

Subject: Island Trust 2050 Policy Feedback

Dear Trustees at Trust Council,

Honorable Christine Boyle, Minister of Housing and Municipal Affairs

It is my opinion that the draft Trust Policy Statement is fundamentally flawed.

I have read the history of the Islands Trust, the 1986 Position Paper Number 1 from Trust Council and the Ministry of Municipal Affairs, the 2021 draft Trust Policy Statement, the current 2003 TPS and of course the draft TPS. After comparing these sources, I realized that the draft 2025 TPS has seriously weakened the protection and preservation of the Gulf Islands environment and natural amenities. I believe that the reason for the current Trust Council not considering that the Islands Trust has a mandate of ecological protection came from the Trustees reinterpretation of unique amenities.

In 1986, Trust Council and the Ministry of Municipal Affairs published *Position Paper Number 1*, giving specific examples and definitions that left no room for doubt about what is preserved and protected: "The special amenities and environment of the Trust area "derive from the combination of: -a mild climate-approximately 500 islands and the extensive coastline and sheltered waters the provide:- diverse and unusual natural features, almost a continuous tree cover and large undeveloped areas;-numerous areas of heritage or archaeological significance- abundant and varied recreational opportunities accessible to adjacent major urban centres; - solitude, scenic beauty and a clean environment- compact, marine-oriented settlements; tranquil rural areas etc....

The initial draft of the 2021 draft included an interpretation of the Trust Object that clearly spelled out the Conservation mandate of the Trust by its interpretation of "unique amenities and environment" to be in part the following: "Located within the Coastal Douglas-fir and Coastal Western Hemlock bio geoclimatic Zones, the Trust Area is home to an exceptionally high biodiversity of rare and culturally significant species, including over 100 federally-listed and over 300 provincially-listed species at risk. These ecosystems are classified as 'sensitive' because of their rarity and vulnerability to disturbances such as human impacts and climate change. ..."

The ITPS- April 2003 state " The Islands Trust has responsibility for conservation through land use planning and regulation and for leadership in stewardship- that is, voluntary cooperative actions that nurture and take responsibility for the long 'term integrity of the environment and amenities of the Trust Area. It is in this context that the word "stewardship" is used within this document. The Islands Trust seeks to integrate ecosystem preservation and protection, sustainable communities and stewardship of resources.

In September 2023 Trust Council met behind closed doors (In camera) to discuss the legal interpretation of the Trust Object in section 3 of the Islands Trust Act. Trust Council provided a

new broadened "consensus" definition (this part should have been done in public) of unique amenities that, "may include issues such as, but not limited to housing, livelihoods, infrastructure and tourism." This new definition incorporates development issues and opens the door to putting development priorities on an equal footing with the ecological mandate and may put them ahead of the ecological mandate.

The difference between the historical interpretations of "unique amenities" and the 2023 re-interpretation is clear. The unique amenities for the current Trust Council are not about natural amenities, not about a rural way of life, is about development and just in case it was add "may include issues such as but not limited to.... This Trust Council re interpretation has greatly influenced the 2025 draft TPS. Conservation of the Islands Trust natural ecological is not more a priority for the Islands Trust in this new draft.

In my opinion the 2025 TPS should not proceed unless and until there is a public consultation on the meaning of unique amenities, and a clear definition that is wholly consistent with the purpose of the Islands Trust Act.

Recommendations for the draft TPS

- At least a Biologist should work in the process of redrafting the TPS. Scientific knowledge should have been a priority in this endeavour.**
- To include historical context of the Islands Trust; governance; and roles and responsibilities of bodies. Without this information the young generation and newcomers to the Islands could not properly interpret the draft TPS.
- To add to the Glossary **the definition of environment** (as the natural environment), and unique amenities (as natural amenities). This is a good definition for "Unique Amenities" The unique natural features of the Islands Trust Area including, but not limited to: vegetation, wildlife tree cover, large undeveloped areas, recreational opportunities adjacent to two major urban areas (The Object of the Islands Trust: Renewing the Consensus. Islands Trust Position Paper No.1, 1986)
- To add to the Glossary the definition **of attainable housing**.
- To add a **definition of density**. It needs to be defined at total footprint of the built environment, not as floor area, an urban metric in the draft document.
- **Sustainability** should be defined as: Meetings the needs of the present without compromising the ability of future generations to meet their own needs (UN Brundtland Report, 1987)
- The Glossary should provide **short definitions of words** to show how to interpret them in the context of the TPS instead of giving large explanations. One example is the word Colonialism. In one of the letters to Islands 2050 a person complains that the definition is not neutral but judgemental, in reality is an explanation of a complex issue. I agree this definition should be

neutral.

Many people have already expressed the same opinion on these issues:

- **Climate change should be a Goal**, with its own directives and advisories policies in accordance with Islands Trust declaring Climate Emergency in 2019. Climate mitigation is mostly missing from the draft TPS.
- The definition of "**environment**" in the TPS should be the "**natural environment**" not "all organic and inorganic matter". This negates the meaning of this term as used throughout the document.
- The natural environment must be a **priority** as the Trust Act mandate intends.
- DIRECTIVE Policies must be **mandatory** for ALL islands as required by the Islands Trust Act. The draft states that directive should be followed "where possible", which weakened the authority of the Trust Executive Committee and the Minister.
- Strengthen groundwater and freshwater protection with **enforceable DIRECTIVES** against unsustainable water usage.
- Instead of speaking of managing growth and development, the draft should say **limiting growth and development**. A directive is needed for each island to produce a build-out report based on current zoning and determine the level of population it can sustainably support while protecting limited resources such as freshwater, native ecosystems and rural character.
- **Affordable Housing**- Instead of allowing density increases for "attainable housing", the density increases must be for affordable housing with a policy to require housing agreements. The density increases must also depend 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 falls to require that local knowledge of water shortages be considered alongside computer modeling.
- Forest unfragmented or fragmented shall be protected with **Development Permit Areas**.
- Instead of using: "**should**", use "**shall**" (as in the current TPS) or **must** for Directives.
- All uses of "consider" during decision-making should be revised to "**require**".
- **Rural Character**- The TPS should include directive policies to protect rural character as an important amenity of the Trust Area.

I urge Trust Council to provide more time for public consultation, especially about the meaning of unique amenities, and to consider. when you make changes to the draft TPS. the commentaries of the people who has written letters, fill up the survey and spoke at public forums in favour of ensuring protection for the Gulf Islands natural environment.

I urge the Minister, upon receiving the revised TPS, not to approve it if unique amenities are not defined by its historical meaning of natural amenities and the natural environment is not giving priority.

Thanks for taking the time to review my concerns.

Maria Carmita de Menyhart

Galiano Island resident