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**Sent:** Saturday, January 31, 2026 10:03 PM

**To:** Jason Youmans <jyoumans@islandstrust.bc.ca>; Islands2050  
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**Subject:** Transition Salt Spring Submission for the Islands Trust Policy Statement

**Attachments:** TSS TPS Submission v5 ma by ja30.pdf

Greetings, Mr. Youmans:

Please find attached our recommendations related to the Islands Trust Policy Statement. On behalf of our Advocacy team, we would like to express our deep appreciation for the work you have led on this critical project.

Thank you,

Bryan Young, Mary Ackenhusen, Pam Tarr and Jon Cooksey

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**Bryan Young**

Director | Past Board Chair | Advocacy Circle Lead

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**Responding to Climate Change. Restoring ecosystems. Reimagining community. Together.**

*With humble respect and gratitude, I reside as a guest on the unceded territories of Hul'qumi'num and SENĆOTEN speaking peoples, including the Quw'utsun First Nation and the Tsawout, Tsarlip, and Tseycuum First Nations.*

**SUBMITTED BY EMAIL**

January 31, 2026

Jason Youmans, Senior Policy Advisor  
Islands Trust  
200 – 1627 Fort Street  
Victoria, BC  
V8R 1H8

**Re: Transition Salt Spring Submission related to the Islands Trust Policy Statement**

Dear Jason,

On behalf of Transition Salt Spring, we are writing to provide feedback on the latest Trust Policy Statement (TPS) draft dated July 29, 2025.

The draft Trust Policy Statement lays out general policies that uphold the stated Islands Trust Object (preserve and protect) while allowing for sufficient flexibility in their implementation at the island level by the LTCs. This balance is critical to allow LTCs to update their OCPs and Land Use Bylaws to meet local and provincial requirements, particularly around housing, and to align with the current and future local needs.

With notable exceptions, particularly with respect to climate risk, the proposed TPS does a good job of outlining policies that balance the need to build housing and infrastructure that align with local island needs, while pursuing the goals of protecting fragile ecosystems, supporting climate mitigation and adaptation at the local level, and ensuring sustainable communities.

The TPS includes stronger policy guidance to help Local Trust Committees align their work with Indigenous Rights commitments, including Truth and Reconciliation and UNDRIP, which marks a clear improvement over the current TPS. Because the Islands Trust undertook significant consultation with at least nine Indigenous governments with territorial interests in the Trust Area, TSS has no additional feedback with respect to draft sections addressing Goals 1 and 2.

We find the new format of the TPS to be clear, streamlined, and reader friendly. Notwithstanding that, TSS feels the TPS document falls short in seven areas where simple amendments would help the reader better understand the document, and better guide LTCs and Bowen Island in their mandate to balance human needs with the need to protect and sustain vibrant ecosystems in an era of compounding climate risks.

On this last point, climate change is acknowledged in the draft TPS, yet mere acknowledgement is insufficient for current conditions. Currently it is treated as one issue among many, rather than as a force-multiplier that will very likely reshape all ecosystem integrity, water security, human safety, and governance capacity in the Trust Area in the coming decades. Instead climate change **needs to be structurally centred as a governing condition of land-use decision-making.**

Truly addressing the converging non-linear impacts of climate change is not something that the LTCs and Bowen can address on their own through new Directive policies. **Rather, Trust Council will need to direct staff to develop a comprehensive support program to provide centralized climate-risk mapping and guidance to clients within the Trust Area.**

Taken together, these changes represent a meaningful shift in the framing of this critical document. That shift is warranted by the scale and immediacy of the climate risks now confronting the Trust Area. In our assessment of the best available climate science, failure to act on these recommendations would amount to a quiet erosion of the Trust's mandate to preserve and protect the lands and waters under its care.

While such policy retreat has become a commonplace expediency in many jurisdictions around the world, it is precisely what this moment asks us **not** to do. Meeting the challenge before us will demand collective resolve and the willingness to act with clarity and purpose.

Our recommendations will be discussed in detail as follows:

1. Integrating Climate Risk into the Trust Policy Statement
2. Directive and Advisory Policy Descriptions
3. Forest Protection
4. Freshwater Protection
5. Growth Management and Intensification
6. Ecosystem Health Indicators, Mapping, Measurement and Reporting
7. Periodic Review and Renewal of the TPS



## **1. Integrating Climate Risk into the Trust Policy Statement**

Climate change is not an additional policy objective to be balanced against others. It is the defining condition under which the Islands Trust Object must now be interpreted and carried out. Impacts to water availability, forest health, ecosystem function, and human safety are no longer hypothetical and are already intensifying within the planning horizons of current Official Community Plans.

When climate change is treated as a discrete topic rather than as an overarching factor that affects ecosystem capacity, hazard exposure, and long-term viability, Local Trust Committees and Bowen municipality are left to interpret risk inconsistently and without clear direction. Embedding climate risk and precaution more clearly across ecosystem protection, growth management, and hazard avoidance would strengthen the Policy Statement's ability to carry out the Trust's mandate over the next decade, which includes its natural environment, non-human creatures, together with its human infrastructure and communities.

These changes will reduce institutional risk to the Trust itself, but also create the conditions for the kind of comprehensive responses that are now necessary.

Addressing multiple climate risks sufficiently is not something that the LTCs and Bowen can address on their own through new Directive policies. Rather, Trust Council will need to direct staff to develop a comprehensive support program to provide centralized climate-risk mapping and guidance to clients within the Trust Area. To that end, a few critical but definitive changes are needed to appropriately frame climate risk and guide our appropriate response to those risks.

### **In short, this gap in the TPS can be closed by incorporating:**

- a. a new guiding principle which acknowledges the centrality of the implications of climate risk to ability of the to fulfill its Trust's mandate,
- b. embedding climate risks explicitly into ecosystem objectives, and
- c. requiring LTCs and Bowen to demonstrate alignment with regional/provincial climate science, prioritize nature-based solutions explicitly tied to ecosystem protection, while clarifying that mitigation and adaptation are now secondary to avoiding new risk exposure.

### **a. New Guiding Principle Recognizing Climate Change as a Governing Condition:**

TSS recommends the addition of the following Guiding Principle:

"To acknowledge climate change as a pervasive and compounding risk to ecosystems, cultural heritage, infrastructure, and community well-being, and treat climate risk, adaptation, and long-term resilience as governing considerations in all land-use planning and decision-making under this Policy Statement."

## **b. Embed Climate Risks into Ecosystem Objectives**

**TSS recommends the addition of the following sentence to the end of the preamble paragraph under “Goal 3: Preserve and Protect Healthy and Biodiverse Ecosystems”:**

“As such, ecosystem preservation and restoration activities must account for climate-driven changes to hydrology, fire regimes, species viability, and cumulative stressors over long-term planning horizons.”

Under “Goal 4: Foster Sustainable, Inclusive, and Resilient Communities,” policies “3.4.5 Climate Change Mitigation and Adaptation” and “3.4.6 Hazardous Areas” certainly mention climate change, but the existing wording seems to suggest that climate risk is something to consider when engaging in business as usual development behaviour. Climate change needs to be the overarching frame for all development planning in the Trust Area.

**As such, 3.4.5 needs to be redrafted as follows:**

“Climate Change as a Governing Planning Condition: Plan and manage land use on the basis that climate change is a determining factor in the long-term safety, ecological compatibility, and viability of development. Planning and land-use decisions shall prioritize the avoidance of new or increased exposure to climate-related risks, limit greenhouse gas emissions, and support adaptation measures only where residual risk can be demonstrated to be manageable over the full planning horizon.”

Similarly, 3.4.6 is written largely to be reactive to perceived existing known risks. Instead it needs to be anticipatory and future-focussed based on the best available current science, applied to specific land-use situations. In discussions of coastal inundation and sea-level rise, for example, there needs to be an admission in the Trust’s policies that mitigation in some circumstances will not be possible, and adaptation might simply mean that retreat is the best strategy for protecting built infrastructure and human lives, and the incremental damage caused by insufficient planning prudence.

**To that end, 3.4.6 needs to be redrafted as follows:**

“3.4.6 Climate-Related Hazard Avoidance: Identify areas subject to current and projected climate-related hazards — including sea-level rise, coastal inundation, erosion, flooding, wildfire, slope instability, and water scarcity — and direct development away from such areas where these hazards are likely to intensify over time. Development shall not be supported in locations where climate-related risks cannot be reasonably avoided or would require ongoing or escalating intervention to remain safe.”



TSS reviewed the “Capital Regional District’s Coastal Flood Hazard Mapping Project: Methods and Assumptions” and understands it as a strong illustration of climate-informed planning that prioritizes risk avoidance over adaptation. That approach is particularly important given the profound uncertainty surrounding future sea-level rise, including the behaviour of Antarctic ice sheets and other interacting Earth systems that are only beginning to be understood. In this context, reliance on IPCC high-end scenarios alone is insufficient as a risk-management strategy; uncertainty itself must be treated as a reason for greater precaution, not less.

These recommendations therefore go beyond routine document refinement and will require institutional and political resolve to implement. Climate change—formally recognized by the Islands Trust as an emergency—now presents compounding and interacting risks, including sea-level rise, drought, catastrophic wildfire, and flooding, that together pose a systemic threat to the long-term ecological, social, and institutional viability of the Trust Area.

## **2. Directive and Advisory Policy Descriptions**

The draft TPS applies the word “shall” to policies that are Directive, and “should” in policies that are Advisory. However, in the TPS’s definitions of each policy stream, there is an inconsistency that will likely create confusion. On page 7, under the heading “Three Types of Policy Statement” TSS recommends additional clarity on the language that is used to define the two streams.

The draft states that Directive Policies “*should be* consistent to avoid rejection or objection” (emphasis added). This phrase contradicts the word “shall” that appears with every Directive policy in the rest of the document. Similarly, the language for Advisory Policies is articulated as “policies...that local trust committees and island municipalities *are advised to* consider” (italics added).

**To better align the explanations of these two types of policy with the content throughout the document, TSS recommends that the following changes be made (emphasis added):**

- **Directive Policies:** “They are policies with which official community plans ... ***shall be*** consistent to avoid rejection or objection....”; and,
- **Advisory Policies:** “Advisory Policies are policies expressing select objectives of Trust Council, that local trust committees and island municipalities ***should*** consider...”

**3. Forest Protection:** The language around forest protection is insufficient. The cumulative development on the islands is drying out the forests and making them increasingly susceptible to wildfire risk, which is arguably the most serious population-level health and safety risk for

residents of the Gulf Islands. Furthermore, the Coastal Douglas-fir ecozone is unique in Canada, found almost exclusively in the Gulf Islands, and therefore needs protection.

**TSS recommends strengthening this aspect of the TPS by adding policies that better protect forests from compounding climate change risks, including measures to reduce the risk of fire, erosion, drought and systemic decline.**

**TSS recommends additional wording to the Islands Trust Principle 2.1.6 “Account for Cumulative Effects” (page 8).** TSS suggests that the cumulative effects of development and climate change are particularly relevant to our forests which are not explicitly included in this Principle. The revised Principle would read:

“To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on forests, watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and species and their habitats.” (emphasis added)

**TSS additionally recommends that wording be added to these goals to better protect forest health in “Goal 3: Preserve and Protect Healthy and Biodiverse Ecosystems”, Policy 3.3.3, and “Goal 4: Foster Sustainable, Inclusive, and Resilient Communities” Policy 3.4.6 in the following ways:**

- Address urban wildfire interface risk with proactive planning standards, land use bylaws, regulations and/or development permit areas.
- Direct growth and density to areas that minimize forest fragmentation.
- Ensure land use maintains or enhances forest drought resilience, and watershed recharge, recognizing the critical role of forests in hydrological resilience.
- Address climate change vulnerability in forests, including measures to proactively reduce wildfire, erosion, and overall ecosystem degradation.

**4. Freshwater Protection:** Insufficient freshwater is one of the biggest and most critical resource issues that reasonably constrain development in the Trust Area. Aside from being a critical human resource, freshwater sustains the life and biodiversity of all non-human aquatic and terrestrial systems. Freshwater supply is widely expected to decline with climate change, while settlement patterns, land use, and growing consumption will add further pressure. Additional safeguards are therefore necessary.

**To that end, TSS recommends that all Advisory policies in this section be made Directive.**

**5. Growth Management and Intensification:** Limiting growth is, laudably, a critical Guiding Principle in the draft TPS, as stated in “2.1.3 Limit the Rate and Scale of Development.” Given its pre-eminence as a guiding principle, it is a notable gap that it is not sufficiently acknowledged in the subsequent goals and policies.



To that end, TSS recommends that the Trust add language to “Goal 4: Foster Sustainable, Inclusive and Resilient Communities,” policy “3.4.2 Growth Management” to further specify suitable locations as follows:

“Manage community growth and its associated impacts by adopting as a primary planning strategy the direction of residential, commercial and industrial development to existing established settled and/or serviced areas to prevent sprawl, minimize fragmentation of forest lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.”

There is, furthermore an opportunity to further elaborate on Principle 2.1.3 with a new Directive Policy under “Goal 4: Foster Sustainable, Inclusive, and Resilient Communities” to develop local policies to direct and limit development and its impacts as follows:

“Define and maintain appropriate limits on the rate and scale of development by establishing clear parameters for development intensity, including maximum lot area coverage, building footprint, number of dwelling units, and site-level water and energy demand, in order to ensure development remains compatible with ecosystem integrity and long-term community resilience.”

#### **6. Ecosystem Health Indicators, Mapping, Measurement and Reporting:**

It is a management truism that you cannot manage what you don’t measure. This is why it is perplexing why measurement and verification features are not sufficiently integrated and elaborated into the policy statement. How will we know that the Trust and its constituent parts have collectively succeeded in achieving its core mandate? Global Forest Watch data confirms that Salt Spring Island alone has seen 6% forest cover decline 2020-2024.

Aside from developing Trust-level indicators, recovery targets, supported by mapping, other forms of data acquisition and regular public reporting, the Trust needs to build a support function to enable all LTCs and Bowen municipality to succeed against Trust Area wide indicators.

To address both of these needs, TSS recommends the following additions to an elaborated implementation plan that demonstrates to readers and leaders across the Trust Area that the Islands Trust will be there to support LTCs and Bowen, and their residents, in this crisis, and that it has the means and skin in the game to track progress with relevant indicators, tools and processes:

“Trust Council will support Local Trust Committees, island municipalities and their constituents by developing and maintaining shared climate-risk information, guidance, and technical resources to promote consistent, evidence-based application of this Policy Statement across the Trust Area.



"Trust Council will authorize the development and maintenance of a comprehensive set of indicators to measure the health of terrestrial and aquatic ecosystems in the Trust Area, and accompanying tools for use by Trust officials and the public, and establish an indicator-based monitoring and recovery target program with regular reporting to the public."

## **7. Periodic Review and Renewal of the TPS:**

Effective implementation of the TPS, particularly in the face of systemic risks such as climate change, requires regular review and renewal. While section "4.2 Policy Statement Amendments" sets out the circumstances under which amendments may occur, it does not establish an expectation of periodic assessment.

**TSS therefore recommends that the TPS include language requiring scheduled review by Trust Council, local trust committees, island municipalities, and the public, with regular updates. This would enable the Trust to respond to evolving risks and conditions while remaining grounded in its statutory purpose.**

In closing, we thank everyone at the Islands Trust for their hard and dedicated work to bring forward this penultimate draft. We would also like to acknowledge and express gratitude for the contributions of so many islanders, island-based organizations, and First Nations in contributing to the redevelopment of this critical foundational Trust document. At root these contributions are an expression of the care we take for these rare, historic and diverse ecosystems.

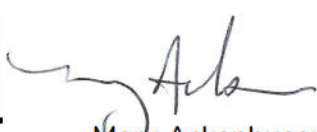
We strongly support the Trust Council's intention to approve this document before the next local government elections as there have been significant opportunities for meaningful community feedback. Efforts to slow it down at this point will likely only derail this critical project. We are past time for this update and must get on with building the community and ecosystem resilience we will need to sufficiently address the challenges ahead.

If you have any questions or need for further discussion around our recommendations, please do not hesitate to reach out to us.

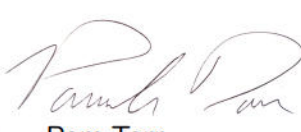
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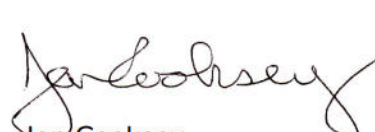
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