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Sent: Sunday, February 1, 2026 8:14 PM
To: Islands2050
Subject: Submission re TPS proposed Bylaw 183
Attachments: Submission re TPS proposed Bylaw 183.pages.pdf

February 2, 2026

**Submission to Islands Trust re: proposed Trust Policy Statement First Reading
Bylaw 183**

I am submitting my article printed in the December 2025 *Island Flagstone*. I include a previous article that appeared June 2021. Both are relevant to First Reading of the proposed Trust Policy Statement Bylaw 183.

*****December 2025 *Island Flagstone* *****

Worries about the Trust Policy Statement

submitted by Harlene Holm

I'm worried that the Trust Council and staff will continue to revise the Trust Policy Statement until it is essentially a Regional Growth Strategy with a mandate equivalent to "whatever."

Since the revision of the Trust Policy Statement was kicked off in 2019, revisions of the revisions of the revisions have consumed time and sapped islander engagement. Bylaw 183, the July 29, 2025 latest version, represents a step forward: first reading of a multi-step approval process.

Spoiler alert: I was in the room when the original Trust Policy Statement was crafted. And, like many islanders, I have slogged through the multiple revisions, surveys, power point presentations ... Given that suffering is optional, I'll send copies of concerns I expressed during the multiple revisions and then await the text of second reading.

For those brave islanders who tackle the July 29th version, please consider three observations:

1. Revision of the original Trust Policy Statement is necessary. At the time of the first Trust Policy Statement: a) Canada —much less the Islands Trust —failed to address the rights of First Nations and the need for reconciliation; b) climate change was more rumour than reality; and c) affordability was not an issue, at least not on remote islands

such as Denman Island.

Are these issues effectively addressed in the latest version?

During a quick read, I note the four Reconciliation Principles begin with “be informed.” And, seven out of nine policies in the Ecosystem goals begin with “identify and prioritize.” Full marks for parallel structure but policies dated 2025 seem to fit 1990. Where are the substantive policies to mitigate the damage done to vegetation, watersheds, habitat, shoreline areas, the rural way of life...

2. On the first page of the 2025 revision, these words appear: “First reading, for consultation.” Yet the Trust appears to be promoting Bylaw 183 more than opening the door to participation.

Islander feedback channels are via a carefully structured survey, a zoom Q&A town hall and an “on-island engagement event” (that does not include Denman Island). Written submissions are catalogued but these take time to create. In the end, Trust Council and staff edit for the second reading according to their judgement of what to change or add or ignore.

3. A reinterpretation of the original Trust mandate “to preserve and protect the trust area and its unique amenities and environment ...” was adopted in-camera by the Trust Council on September 26/23 and expands the term “unique amenities.” The reinterpretation reads, “Trust Council’s view is that unique amenities are broad-ranging and may include issues such as, but not limited to, housing, livelihoods, infrastructure and tourism.” The closed door meeting essentially highlighted development as the object of the Trust.

Cheers to all who read the newest iteration. The Trust Policy Statement shapes decisions that impact the environment, our community and your neighbourhood.

***** June 2021 *Island Flagstone******

Trust Policy Statement Hot Mess

submitted by Harlene Holm

Q: What limits and directs our Official Community Plan, our Land Use Bylaw and applications for zoning amendments?

A: The Trust Policy Statement.

The mandate of the Islands Trust, referred to as the Object, is to preserve and protect the unique amenities and environment of the islands and waters within its jurisdiction. The Trust Policy Statement is the mechanism, the blueprint if you will, for achieving this mandate.

The Policy Statement is being rewritten based on a revamped understanding of the Object. The March Trust Council—the quarterly meeting of all local trustees to address Trust-wide issues—directed Trust staff to “incorporate the concept of and protection of healthy and inclusive communities including housing and transportation.”

The Islands Trust was created to protect fragile island ecosystems from the unprecedented onslaught of the most invasive of species: people. Magic Lakes Estates on Pender Island was a catalyst, with over 1,200 city-sized lots—the largest subdivision in Canada at the time. The Islands Trust Act shifted the land use planning function held by local government to the Trust and away from Regional Districts.

The first Denman Island Local Trust Committee (LTC) inherited a zoning grid enacted by the Comox Valley Regional District (CVRD). For the CVRD, “rural” meant not-yet-but-soon-to-be urban. Imagine Denman’s existing small lot subdivisions extended to cover all of the island’s coastal areas and viewscapes.

I served as a local trustee for 1978-1984, a time when the very existence of the Islands Trust was endangered according to the winds of political change (read “Bill Vander Zalm”). As a local trustee for Denman Island, I initiated the long process of increasing minimum lot sizes to curtail the intensive residential use permitted in the CVRD regulations for Denman.

Along with fellow trustees and Trust staff, I also worked on the original text of the Policy Statement. We were of one accord in our belief that “the object of the Trust is to preserve and protect the Trust area and its unique amenities and environment.” In Louise Bell’s words, “The Islands Trust is not here to promote residential land use and address social problems.”

Protecting the environment includes assessing the potential impact of proposed development and setting a density cap that is based on the carrying capacity of the island, as established by an objective application of the cautionary principle. It also involves pressuring the provincial government to provide the Islands Trust with the tools needed to achieve this goal.


As a faithful and active supporter of the Islands Trust, I am shocked and discouraged by the altered direction the present Trust Council has adopted in revising the Policy Statement. I understand and appreciate that local trustees share a universal concern that human communities flourish; however, that is not the legislated Object of the Trust. I refer you to my favourite Aesop’s Fable: The Man, the Boy and the Donkey that concludes “Please all, and you please none.”

Pressure for housing, employment opportunities and private property rights will never go away no matter the number of development concessions and densification options. At the same time, however, ecosystems are being destroyed, forests clearcut, wetlands drained and the carrying capacity ignored.

The Trust Policy Statement rewrite is a hot mess of the good, the bad and the ugly. The draft document rearranges content, omits text, edits intent and dodges controversial issues.

Please join me in asking the Trust Council to delay giving First Reading at its June 8-10 meeting and to instead allow islanders time to review and respond at the draft stage (Islands Trust Website <https://islandstrust.bc.ca/contact-us/share-your-views/>). After First Reading, engagement is limited to opposition: not a good option.

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