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**Sent:** Monday, February 2, 2026 3:35 PM  
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**Subject:** Islands Trust - Policy Statement Consultation Feedback

Dear Members of Islands Trust Council,

Thank you for the opportunity to provide input on the "draft" Islands Trust Policy Statement currently out for consultation.

I recognize that considerable effort has gone into this document and appreciate its stated goals, particularly with respect to goals for reconciliation, land use and environmental stewardship. I also support the overall purpose and mandate of the Islands Trust.

That said, I believe several elements of the Policy Statement would benefit from further refinement to improve clarity, workability, and fairness for residents, private landowners, and the broader public who live in, recreate in, and enjoy the natural beauty of the islands and coastal waters of the Trust Area.

While I completed the online survey, I did not feel I was able to convey my concerns in a meaningful way so I am following up my survey answers with this email which addresses them in a more articulately.

My comments below are offered in the spirit of constructive feedback, with the hope that the final Policy Statement provides clearer guidance, practical implementation tools, and greater certainty for all parties.

## **1. Co-Governance and Decision-Making**

The draft introduces language related to co-governance and shared decision-making with Indigenous Governing Bodies, but it does not explain how this would function in practice. Clearer articulation of roles, limits, accountability, and final decision-making authority would help avoid confusion or duplication and ensure that the responsibilities

of the Islands Trust Board and Local Trust Committees remain well understood. Greater clarity here would benefit residents, applicants, and decision-makers alike. Most importantly, further consideration as to how existing private property owners may be affected under a co-governance model.

## **2. Mandatory Engagement and “Knowledge Holders”**

The requirement for mandatory engagement with Indigenous Governing Bodies, including reliance on “Indigenous Knowledge Holders,” raises practical questions around consistency and transparency. Land-use decisions are strongest when they are supported by clear, documented information and well-defined processes. Additional guidance on how subjective or unverified Indigenous knowledge would be documented, assessed, and considered alongside established planning, archaeological, and historical records would help improve confidence in decision-making outcomes.

## **3. Cultural Monitors**

The Policy Statement’s support for cultural monitors during ground-disturbing activities also raises implementation questions. While the intent is understandable, this approach is not practical in many situations and may introduce added cost and delay, particularly for small residential or routine project, such as a fence or outhouse. At present, the draft does not address availability of trained monitors, how monitoring would be coordinated across a vast geographical area over many islands, or how costs would be managed. Further analysis would help determine whether this policy direction is practical and proportionate.

## **4. Docks and Foreshore Management**

The expanded policy direction related to docks, foreshore use, and marine access appears to extend beyond the Trust’s traditional planning role. These matters are already subject to federal, provincial, and local regulation, as well as private management by private property owners. Careful consideration should be given to avoiding regulatory overlap or uncertainty, particularly where existing frameworks are already in place and functioning. In addition, the Trust should be careful not to disrupt historical decisions and agreements that grant access and benefits to private property owners.

## **5. Private Property Rights and Certainty**

Several elements of the draft Policy Statement could create uncertainty for private property owners, particularly where the distinction between advisory policy, directive policy, and legal authority is not clear. Predictability and clarity are essential for responsible land stewardship, and clearer boundaries within the Policy Statement would help ensure that property owners understand how policies may affect them in practice. Any historical rights and privileges of existing private properties should continue to be respected by way of legal grandfathering provisions.

## **6. Public Access to Lands and Waters**

The draft contains broad language that could have implications for public access to lands, foreshores, and waterways that are currently shared and enjoyed together by the general public and private property owners. In particular, stronger clarification is needed around how public access would be maintained if areas of cultural or spiritual importance are identified, or “Indigenous Protected” and “Conservation Areas” are established.

A clearer explanation of how Indigenous interests and the broader public interest will be balanced would strengthen this section. Any decisions that result in restricted access or increased regulation affecting today’s use and enjoyment by private property owners would be unacceptable. Furthermore, any decisions that would result in restricted access to existing provincial parks, such as the situation that has played out at the Joffre Lakes, would not be acceptable to those who use and enjoy these parks.

## **7. Notification and Engagement Survey design**

I am not certain how the request for submissions has been handled but in my own situation I was only made aware of the process when a friend notified me of the proposed changes to the Policy Statement last Monday, just eight days before the submission deadline. As this document was created in July, I would have expected a more broad notification process and a reasonable timeline for submissions to be made. Perhaps I missed a mail-out or advertisements on the notice of consultation but I have learned over the past week that many people find themselves in a similar position.

I am also concerned that aspects of the current public survey may limit the usefulness of the feedback collected. Several questions combine multiple, distinct policy concepts into a single response, which does not allow respondents to express nuanced or mixed views. Separating these concepts would better capture the diversity of perspectives within the community and provide Council with more meaningful input.

## **8. Glossary Language**

Finally, the Glossary of Terms includes some questionable references such as “colonialism” that may not be necessary for a land-use policy document and, in some cases, may be perceived as ideological rather than technical. With respect to this particular reference, I am personally offended that a document would suggest that today’s owners of private properties could be insinuated as colonialists.

In my opinion it would be better to reply upon terms specific to the land use mandate, and in this respect, use language that is clear, neutral, and widely understood planning terminology. This would better support the Policy Statement’s regulatory purpose while not threatening or being disrespectful to today’s private property owners. If you wish to ensure broad public confidence of a new policy statement a more balanced and cooperative approach is recommended.

## **Closing**

In closing, while I support many of the objectives of the Islands Trust, I believe the Policy Statement under review would benefit from further refinement to improve governance clarity, practical implementation, respect for property rights, and certainty around jurisdiction and public access.

Additionally, I would also recommend extending the date for submissions as I suspect that many property owners within the governance area are either not aware of the Policy Statement review or have only had a short time to consider the proposed changes.

I would ask the Board of Directors to consider my comments as part of its revisions, with the goal of producing a Policy Statement that is both principled and workable over the long term and has a stronger emphasis on protecting private property rights.

Thank you again for the opportunity to provide feedback during this consultation process.

Sincerely,

Andrea Hamilton & Neil Chrystal  
(recreational boaters, and property owners within the trust area)