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Sent: Monday, February 2, 2026 3:53 PM
To: Islands2050
Cc: Chris Higgins; Peter Snell; Jeanne Mikita; Boris Gorgitza; Samantha Mayawing; Peter Scholefield; Mike Stamford; Kate-Louise Stamford
Subject: Feedback for the Islands Trust Policy statement
Attachments: 2026-02-02 Response to Islands Trust Policy Statement.docx

Hello Islands Trust

Please see attached comments from the Gambier Island Conservancy regarding the Draft Islands Trust Policy Statement

Thank you
Carol Petroski
President
Gambier Island Conservancy

We recognize that Chá7elkwnech (Gambier Island) lies within the traditional territory of the Skwxwú7mesh Úxwumixw (Squamish Nation).

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Gambier Island Conservancy
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To: Islands Trust Programs Committee

Dear Members of the Trust Program Committee

Thank you for the opportunity to provide feedback on the 2025 draft Islands Trust Policy Statement. Please see below the comments and concerns of the Gambier Island Conservancy.

Respectfully

Carol Petroski
President
Gambier Island Conservancy
cc. GIC Directors
Kate-Louise Stamford

General Comments

In 2022, 11 Island Conservancies joined together to show support for and recommendations to the 2021 Draft Trust Policy Statement. There was a great deal of enthusiasm for many of the progressive goals and directives written in the policy.

The 2025 proposed Draft Trust Policy Statement (TPS) is very different, and in our view significantly weaker than the 2021 draft policy. While there are some areas that are appropriate, many of the goals and directives are vague and open to interpretation. This will lead to confusion and potentially division at the local level.

Every island has different realities that must be considered in the policy, so to have a broad definition for many of the directives would seem to be appropriate. However, it also allows for actions that could be in opposition to the Object of the Islands Trust, which is to *'preserve and protect the Trust Area and its unique amenities and environment for the benefit of the residents of the Trust Area and of British Columbia generally'*

The very reason for the existence of the Islands Trust based on the incredible vision of the proponents of the Islands Trust Act in 1974, is being diluted to the point where in some policy areas, it will be irrelevant.

Request for Advocacy

The Islands Trust is very aware that their mandate in certain areas of land use on the island is limited and that in many areas (e.g. Forestry and private logging) they must work in conjunction with other governmental agencies to achieve the goal of '*preserve and protect*'

In the 2021 Draft TPS, section 4.1.11 it clearly states that
*Trust Council shall coordinate with, **and advocate to**, other government agencies to foster actions, programs, and incentives that:*

- *place priority on the integrity of the environment in the Trust Area*
- *protect the diversity of native species and habitats in the Trust Area; and*
- *prevent pollution of the air, land, freshwater networks, and marine waters of the Trust Area*

The current draft TPS says the following:

Work Towards Strategic Inter-Agency Coordination

To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.,

I was unable to find any that indicates the Islands trust Council will **advocate** for the natural world of the islands with other agencies. Having a relationship with counterpart agencies is important, **but 'work with' does not always mean 'advocate for'**.

Without that effort being made, it will continue to be difficult for the Islands Trust to truly protect the island ecosystems.

Specific areas of concern (not in order of importance)

- 1) **Climate Change** - Climate change is one of the most pressing issues of our time. In 2019 the Islands Trust Council declared a climate emergency. In the 2021 Policy Directions of public engagement, it was one of the 3 pillars of concern from the community. Yet there is very little mention of it in the 2025 TPS. It needs to be highlighted with a specific goal describing the Island Trusts focus on Climate Change.
- 2) **History and Purpose of the Islands Trust** - The current TPS gives a robust explanation of the history of the Islands Trust development and evolution. It's important that the public be given an opportunity to really understand why the Islands Trust exists, and its role in the Trust area. This is missing in the current draft.
- 3) **Islands Trust Conservancy (ITC)** – There is very little mention of the ITC in the draft TPS. It is an integral and important part of the Islands Trust, and again, it is important that the history and purpose of the ITC be included in Part 1 – Islands Trust Act.
- 4) **Environment** – the word 'environment' appears throughout the document, but there is no definition as to what that word means. This must be defined, as it is an integral part of the Object of the Islands Trust. The intent of the Trust Object was and still is squarely focused on protecting the **natural environment** of the islands for the benefit of all of BC. The definition must be on the **natural environment**. Without clarity on the scope of the word, it is open to broad interpretation, with the end result of undermining the Act's objectives.

- 5) **Unique Amenities** – as per ‘environment’ these words appear throughout the document. There needs to be a clear definition as to what the Islands Trust means when those 2 words are used. In the past it has meant preservation of the rural character of the island, preservation of the natural environment, as well as other areas of focus on the islands. It’s important that amenities on the islands do not become infrastructure, tourism, development, but remained focused on what the Object of the Trust is supposed to protect.
- 6) **Purpose and structure of the Policy Statement** - states that *official community plans and bylaws required to be submitted to Executive Committee or Trust Council under the Act **must not be approved if they are contrary to or at variance with the Policy Statement**. This ensures that the Islands Trust Object is at the core of all planning and land use management decision-making in the Islands Trust Area.*
- When considering the language used on Page 7 – Three Types of Policies in the Policy Statement, Directive policies must be followed. In the language used in many of the directive policies, it often states ‘should’, ‘if possible’, and allows for a variance to be applied. This allows for varying interpretations of a directive. The requirement for a directive is that it be clear and concise. The language needs to be changed to ‘must’, and variances from the directive TPS must not be allowed.
- 7) **2.1.6 – Account for Cumulative Effects** currently states: ***To strive to account for the cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, groundwater supplies, culturally sensitive areas and cultural heritage sites, and species and their habitats.***
- Replace the words ‘to strive to account’ to **Prioritize accounting for cumulative effects...**
- Groundwater supplies should be changed to freshwater supplies to ensure that all water sources are considered.
- 8) **Ecosystem Integrity** – in the 2021 draft TPS there was a category named Environmental Integrity Policies. (4.1). The wording within that section shown below was clear, concise, and promising.

4.1.1 It is Trust Council’s policy that **proactive land use planning is essential to the preservation and protection of Trust Area ecosystems.**

4.1.2 It is Trust Council’s policy that **protection must be given to the natural processes, habitats, and species of the Trust Area, including those of old forests, Coastal Douglas-fir forests, Coastal Western Hemlock forests, Garry Oak/Arbutus forests, wetlands, open coastal grasslands, the vegetation of dry rocky areas, lakes, streams, estuaries, tidal flats, salt water marshes, drift sectors, lagoons, kelp forests, eelgrass meadows, and spawning areas.** 4.1.3 Trust Council **commits** to establish and **sustain** a network of protected areas throughout the Trust Area, in collaboration with the Islands Trust Conservancy Board, acknowledging that unfragmented connectivity is necessary to preserve ecosystems in sufficient size and distribution to sustain their environmental integrity.

The current TPS states:

Forest Ecosystems: Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forests, with a particular focus on the maintenance and restoration of their ecological integrity.

Coastal Oak and Prairie Ecosystems: Identify and prioritize the preservation and protection of coastal oak and prairie ecosystems, with a particular focus on the maintenance, restoration and management of their ecological integrity.

Prioritize has a very different emphasis when compared to **must be given**.

As the 2021 Draft TPS says – protection **MUST BE GIVEN** to the natural process, habitats and species of the Trust Area.

- 9) **3.3.2 Sensitive Ecosystems** - *Identify and prioritize the preservation, protection, and restoration of sensitive ecosystems in the Islands Trust Area, classified as the following ecosystem types: cliff; **coastal bluffs**; freshwater; herbaceous; old and mature forest; riparian; wetland; and woodland.*

While old forest and old-growth forest are essentially the same, being defined by their stand age of greater than 250 years old, we prefer the term old growth as it is more commonly used by those wishing to preserve and protect trees greater than 250 years old. Add Coastal Bluffs to the descriptor and include it along with old-growth forest and mature forest in the glossary.

- 10) **3.3.3 Forest Ecosystems** - *Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forests, with a particular focus on the maintenance and restoration of their ecological integrity.*

Forest ecosystems that are currently at risk include Coastal Douglas Fir, Western Red Hemlock, Garry Oak and Arbutus. They need to be named in the above directive policy.

Add the following – and the potentially adverse impacts of growth, development, climate change and land-use.

- 11) **3.3.5 Watershed Ecosystems** - *Identify and prioritize the preservation, protection, and restoration of watershed ecosystems, freshwater sources, and groundwater recharge areas.*

Add wetlands and riparian areas

- 12) **3.3.7 Critical Habitat for Species at Risk** - *Identify and prioritize the preservation, protection, and restoration of critical habitat for species at risk*

All Native Species on the Islands must be protected.

- 13) **Managing Growth and Development** – There is a category of thought that is missing in the current draft TPS that considers the Rural aspects of the planning policies. The directive policies as written do not provide sufficient urgency to the guidelines as written. Limiting Growth and Development should be the goal in all aspect of land development on the islands. The 2021 draft TPS offer some very concrete statements that should be added to ensure the object of the Trust would be more completely supported.

- 14) **3.4.2 Growth Management** – Change the heading to Limit Growth and Development and should read: establish appropriate density and population limits to prevent sprawl, conserve freshwater resources, protect groundwater recharge areas, prevent septic contamination, prevent saltwater intrusion and protect the unique amenities and natural environment of the trust area.

- 15) 2025 TPS - 3.4.3 **Impacts of Development** Consider the aesthetic, environmental, and social impacts of development.

Should be reinforced/replaced with the following statement

6.1.1 It is Trust Council's policy that the rural characteristics of islands in the Trust Area, including the scenic value of

rural landscapes, opportunities for nature connection, and low levels of noise and light pollution, are unique amenities that are to be preserved and protected in accordance with the Islands Trust Object.

- 16) 2025 TPS – 3.4.5 - Climate Change Mitigation and Adaptation** - In response to the Islands Trust 2019 Climate Emergency Declaration Implement a transformative climate emergency plan that recognizes the interconnected climate, ecological, and social crises; embeds equity, anti-racism, and social justice at its core; and upholds Indigenous Title and Rights, and Treaty Rights. Included in the Official Community Plans of Local Trust Committees and Bowen Island Municipality are greenhouse gas reduction targets. Additionally, Investments in and approvals of new oil and gas projects within the Trust Area will be opposed.

Additionally, the following should be added:

6.1.2 It is Trust Council's policy that all development in the Trust Area, of any scale or for any purpose, should be compact, energy-efficient, sustainable, and appropriately situated in order to minimize greenhouse gas emissions and safeguard protected area networks, freshwater sustainability, a healthy marine environment, and Indigenous cultural heritage in the Trust Area

And the following should be added.

6.1.4 Trust Council shall strive to identify, monitor, and address the impacts of climate change on Trust Area communities through climate vulnerability assessments, adaptive management approaches, and nature-based solutions that are informed by the best available area-based mapping, science, social science, local knowledge, and Indigenous ways of knowing

- 17) 2025 TPS – 3.4.7 Economic Activities** Support sustainable economic activities that are compatible with the preservation and protection of the Trust Area and its unique amenities, environment, community well-being, and that consider transportation and infrastructure capacity.

Should be replaced with:

6.1.3 It is Trust Council's policy that growth, development, and economic opportunities in the Trust Area should be small scale, sustainable, climate resilient, compatible with community character, and in alignment with the Islands Trust Object.

- 18) Goal 5 – Foster Sustainable Stewardship of Lands and Waters.**

*Islands Trust Council recognizes that sustainable use of lands and waters in the Islands Trust Area is **important** to the long-term well-being and resilience of ecosystems in the Islands Trust Area and the communities that depend on them.*

Freshwater in the Trust area is not only important, but **essential**. Replace 'important' with 'essential'.

- 19) 3.5.1 Freshwater Sustainability** - Ensure that neither the density, nor intensity, of land use is increased in watersheds where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable - **add – to both the community and the natural environment that is also dependant on the water resource.**

- 20) 3.5.3 Freshwater Self-Sufficiency** - Ensure that islands are self-sufficient in their supply of freshwater.

We know that some islands are no longer self-sufficient in water availability. Recognize that and ensure that all islands that are currently self-sufficient maintain their self-sufficiency.

21) Make the following Advisory policy a Directive policy.

3.5.6 Freshwater Uses - Ensure that water quality in lakes, streams and wetlands is maintained, and that freshwater use is not to the detriment of other uses of the waterway such as fish and amphibian habitat uses, Indigenous cultural and spiritual uses, and aesthetic and recreational uses.

22) 3.5.7 Freshwater Storage - Encourage freshwater storage in groundwater regions where the quality or quantity of groundwater is likely to be inadequate or unsustainable.

Encourage freshwater storage in all areas of the islands.

23) Forest Lands - The goal for Forest lands should state:

- *forest ecosystems in the Trust Area should be protected*
- *the remaining stands of relatively undisturbed Coastal Douglas-fir and Coastal Western Hemlock zones, and their associated ecosystems, should be preserved and protected*
- *forest cover is a representative characteristic of the Trust Area and should be maintained;*
- *the aesthetic value of forest land should be protected*

24) 3.5.8 Forest Lands for Sustainable Management - Maintain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the Trust Area and its unique amenities and environment.

Should be replaced with the following:

Forest harvesting in the Trust Area should be limited, small-scale, sustainable, regenerative, supportive of climate action, respectful of Indigenous harvesting areas, and protective of the environmental integrity of the Trust Area.

Clear-cutting of forests and logging of old-growth trees is inappropriate anywhere in the Trust Area, acknowledging the multiple adverse impacts these activities incur on the fragile ecosystems, environmental integrity, and carbon capture and storage potential of the Trust Area. Furthermore, established Legal Old-Growth Management Areas (OGMSs) and Draft (Non-legal) OGMA should be maintained and managed in their currently designated locations. OGMA should be defined in the glossary.

25) 3.5.10 Forest Lands and Wildfire Risk Management

Identify planning and land use management strategies that mitigate wildfire risk and that are appropriate to the unique biogeoclimatic zones and settlement patterns of each local planning area.

Add a separate directive that recognizes Wildfire risk is shaped by both forest management practices, climate change and very close wildland urban interface zones throughout the islands.

The directive should be based on development and building strategies as outlined in the FireSmart program developed by the Federal Government.

Glossary of Terms

The Glossary should appear at the beginning of the ITP not at the end.

It is suggested to add the following additional terms:

1. Old Growth Management Area (OGMA): An Old Growth Management Area (OGMA) in BC:
 - A mapped area containing or to be managed for structural old-growth forest attributes.
 - Recognized either legally (by Ministerial order) or as a draft (non-legal) planning designation.
 - Integrated into forest management planning to help protect old forests and their ecological, cultural, and landscape values.
2. Old-Growth Forests: BC's government generally defines old forests (old growth) by stand age, which is greater than ~250 years old in coastal and wetter interior ecosystems — where disturbances are infrequent and trees can live longer.
3. Mature Forest: Mature forests are stands that are past the early developmental stages greater than ~80 years old in low elevation coastal (Coastal Western Hemlock / Coastal Douglas-fir) ecosystems.
4. Coastal Bluff Ecosystem: In BC, a Coastal Bluff ecosystem refers to the natural communities found on steep, exposed cliffs and bluffs along the ocean, especially common on the south coast (e.g., Strait of Georgia, Vancouver Island, Gulf Islands).
5. Marine Riparian Areas: Marine riparian areas are the transition zones where land meets the ocean, extending along the shoreline of seas, straits, and inlets. In BC, they are a critical part of the coastal ecosystem.
6. Define Green Shores

3.4.31 Trail Systems: add the following sentence: Routinely clear and manage public trails to ensure safe usage and install suitable wayfinding signage, at trailheads along trails and on roadways connecting parts of trail networks.

3.5.20 Setbacks from the Sea: add the following sentence: Included in the Official Community Plans of Local Trust Committees and Bowen Island Municipality are prescribed setbacks from the high-water mark to preserve and protect the ecosystems within the marine riparian areas.