

From: Priya Puri <priya@raincoast.org>
Sent: Monday, February 2, 2026 3:07 PM
To: Islands2050
Cc: Chris Genovali; HMA.Minister@gov.bc.ca; rob.botterell.mla@leg.bc.ca; Aaron Campbell; Deb Morrison; David Maude; Dag Falck; Kristina Evans; Tobi Elliott; Jeannine Georgeson; Lisa Gauvreau; Risa Smith; Susan Yates; Tanner Timothy
Subject: RE: Phase 4 public engagement on the draft Trust Policy Statement
Attachments: Raincoast Conservation Foundation response to draft TPS.pdf

Dear Islands Trust Council,

Please see the attached letter from Raincoast Conservation Foundation in response to the Islands Trust draft Policy Statement.

Kind regards,
Priya Puri

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Priya Puri (she/her), MSc
Program Coordinator
[Forest Conservation Program](#) | [Raincoast Conservation Foundation](#)
Phone: 604-374-4550



RE: Phase 4 public engagement on the draft Trust Policy Statement

February 2nd, 2026

Raincoast Conservation Foundation
P.O. Box 2429
Sidney, British Columbia, V8L 3Y3

To Island Trust Council:

Please accept and review this letter as part of the public engagement process currently underway to inform the revision of Bylaw 183, the Islands Trust Policy Statement (TPS). Though the proposed draft makes some important updates to the extant TPS (1994, Bylaw 17), such as acknowledging climate change, these updates have been made without operational pathways to ensure they are mobilized into effective action.

On behalf of Raincoast Conservation Foundation, we urge Trust Council to amend the TPS draft to uphold its environmental protection mandate into an actionable directive policy, as the Trust's Object always intended.

The Trust was established in 1974 to prevent unrestrained growth and development. Its Object is clear and cannot be redefined in the modern context by Trust Council for convenience. The terms "environment" and "unique amenities" were intended to protect the natural environment and its inherent qualities, as understood at the time of enactment. These amenities include the natural features of land and water that provide ecological, scenic, cultural, and public benefits, and whose protection prevents environmental degradation.

That original purpose must continue to guide interpretation. The Object must be interpreted purposively to prevent the very harms it was designed to prevent, not to reintroduce them through technical reinterpretation. Disregarding the historical meaning of the term "amenities" revives those harms. In this regard, the draft TPS's emphasis on *managing* rather than *limiting* growth represents a departure from the Trust's founding purpose. To preserve the natural environment and rural character of the Islands, the TPS must include a clear growth-limiting directive policy.

Importantly, the history section that describes the establishment of the Islands Trust and its "special conservation-orientation responsibility" has been deleted from the draft TPS, as has the warning about "extreme pressure from population growth and tourism." Other sections that have been removed include the requirement to respect Official Community Plan "density limits" and the requirement to protect "community character." These omissions undermine the specific responsibility of Trust Council (and the LTCs) to regulate growth and development in the Trust Area.

Equally important are instances of language introduced to goals and policies that are not consistent with the Object or the Act. The intent of such language appears to subtly infer that the Trust has responsibilities where it does not. For example, the addition of “supporting community well-being” in Goal 5 is a subtle reframing of the Object, seemingly to give the Trust responsibility for initiatives that are outside its mandate. To be clear, the Islands Trust does not have responsibility or authority for social services. The Act consistently ties all Trust powers back to “preservation and protection of the Trust Area and its unique amenities and environment,” not to social or economic policy.

Further, the draft TPS introduces new types of policies, with Directive Policies being the only mandatory policies. Advisory Policies and Guiding Principles are simply informational. Yet, the draft TPS also states that Directives “should” be followed “where possible”, language that can again undermine even the Directives that seem to be clearly implementable (of which there are few). Likewise, there are many examples where policies contradict each other, such as non-enforceable Guiding Principles that promise to “limit the rate and scale of development” but are negated by growth management Directive Policies that carefully avoid the use of “limit.” TPS directives need to be clearly mandatory and clearly in service to the Object of the Trust.

The draft also makes clear that the Trust fails to understand that housing provision is not within its mandate; this responsibility rests with Regional Districts and the Province. The Trust’s role is to regulate land use where affordable housing can occur. After decades of misguided development—including oversized single dwellings, industrial-scale logging, shoreline armouring, and erosion of the Gulf Islands’ unique amenities—nearly every Island in the Trust Area faces acute affordable housing shortages, with suitable land largely exhausted. Density increases should be granted only for genuinely affordable and workforce housing, secured by binding agreements, scaled appropriately to each Island, and contingent on adequate sewage and water capacity that protects the finite nature of resources, the natural environment, and the quality of life requirements of existing communities.

The true Object of the Trust seems to be lost from this document. While preservation of ecosystems, such as forests and wetlands, is touted in Directive Policies, the draft TPS offers no meaningful direction on how these ecosystems will be preserved in practice. Recognition without enforceable action is insufficient. The TPS must require the employment of concrete policy tools, including clearly defined and mandatory Development Permit Areas, to ensure that ecosystem protection is not merely aspirational but actionable and enforceable.

Finally, given the Trust’s own Climate Emergency declaration, climate change only receives cursory treatment in the draft TPS, despite being one of the most serious and defining challenges facing the Trust Area. Sea level rise, coastal erosion, shrinking freshwater supplies, saltwater intrusion, and escalating wildfire risk are already affecting the Islands and the livelihoods and services of islanders, and will intensify over time. Yet, the draft only includes a handful of steps toward taking true climate action. The TPS must place climate change at its core, with clear

priorities and enforceable policies that reflect the scale, urgency, and inevitability of climate change impacts.

The Trust knows its core purpose. Section 3 of the *Islands Trust Act*, which is quoted in the opening statement of the draft TPS, states it explicitly. Even in the opening comments of the *Islands Trust Draft Policy Statement Survey*, the TPS is described as a vision for the “**preservation and protection of the Islands Trust Area**” aspiring to reflect the values and interests of, among others, “**the silent voices of island ecosystems, species at risk, and future generations**”. Yet, as written, this draft policy document, intended to guide the Trust’s work over the next twenty-five years, does not adequately address and respond to the realities of the twin biodiversity and climate crises.

Ultimately, this draft falls short of the moment we are in. At a time when the climate emergency and accelerating biodiversity loss are reinforcing one another, and the limits of resources like land and water are undeniable, the TPS offers incremental or contradictory policies where they should be transformative. By treating these crises in isolation and relying on vague commitments rather than clear, enforceable action, the draft misses a critical opportunity to set a credible pathway toward systemic change. In doing so, it underestimates both the scale of the challenge and the responsibility of this policy to respond with ambition commensurate with the risks we face.

Please reconsider.

Sincerely,

A handwritten signature in black ink that reads "Chris Genovali". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Chris Genovali, Executive Director

A handwritten signature in black ink that reads "Priya Puri". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Priya Puri, Forest Conservation Program Coordinator
On behalf of Raincoast Conservation Foundation