

BYLAW REFERRAL FORM RESPONSE SUMMARY

Approval Recommended for Reasons Outlined Below

Approval Recommended Subject to Conditions Outlined Below

Interests Unaffected by Bylaw

Approval Not Recommended Due to Reason Outlined Below

Islands Trust Area (Islands 2050)

(Island)

TC 183

(Bylaw Number)

(Signature)

(Title)

(Date)

(Agency)

October 22, 2021

Islands Trust - Islands 2050
200 – 1627 Fort Street
Victoria, BC
V8R 1H8

ISLANDS TRUST POLICY STATEMENT REFERRAL – BC FERRIES RESPONSE

Thank you for the opportunity to review and provide feedback on the update to the Islands Trust Policy Statement. We have reviewed the document and proposed changes, and generally support the proposed amendments, with the following specific comments:

4.6.7 It is Trust Council's policy that the following restrictions are necessary in order to preserve and protect the sensitive coastal and marine waters of the Trust Area:

- ***seawalls and other hard shoreline armoring should not be developed; (new)***
- ***moorage and anchorage sites in eelgrass meadows should not be permitted; (new)***

BC Ferries endorses the “should” language used here (rather than the stricter “shall”). These are desirable however there could be exceptions for future BCF infrastructure where these items are a consideration for a preferable alternative with proper design and environmental offset.

4.6.10 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, direct the location of buildings and structures such that they do not: (4.5.5, 4.5.10)

- *adversely impact sensitive coastal and marine ecosystems, naturally occurring stocks of shellfish, eelgrass meadows, kelp forests, forage fish spawning areas, tidal salt marshes, mud flats, coastal wetlands, middens, or archaeological sites;*
- *interfere with natural coastal processes;*
- *restrict First Nations' access to traditional coastal and marine harvesting sites;*
- *restrict public access to, from, or along the marine shoreline*

This is generally desirable and supported however there could be exceptions for future BCF infrastructure where these items are a consideration for a preferable alternative with proper design, environmental offset and First Nations collaboration.

4.6.16 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, prohibit the use of seawalls and other hard shoreline armoring in the Trust Area and include policies that foster soft shoreline protection.

This is generally desirable and supported however there could be exceptions for future BCF infrastructure where these items are a consideration for a preferable alternative. Recommend changing to "should" from "shall". Also note that the "should" language is used in policy 4.6.7 of this similar item, which is supported.

If you have any questions or would like to discuss these comments please do not hesitate to contact me by phone at (250) 978-1442, or by e-mail at mitchell.jacobson@BCFerries.com.

Yours sincerely,



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