

January 16, 2016

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Islands Trust - Islands 2050

200 – 1627 Fort Street

Victoria, BC V8R 1H8

RE: Response from Bowen Island Municipality to Referral Request for Draft Islands Trust Policy Statement

Dear Nadine

Bowen Island Municipality expresses its gratitude to the Islands Trust for the Referral Request of the Draft Islands Trust Policy Statement, Bylaw 183, dated August 8, 2025. Council and Staff are appreciative and supportive the work done to update and modernise the Islands Trust Policy Statement to better address the challenges the Islands Trust is facing.

Bowen Island Municipality Council **recommend Approval of Trust Council Bylaw 183., subject to conditions outlined below.**

Council makes the following general comments:

1. General Comments and Recommendations

- a. BIM requests that gaps in data should be identified and clear demarcation be done regarding which responsibilities rest with the Islands Trust Council, Local Trust Committees, and Island Municipalities respectively.

Bowen Island Municipality requests that several changes to be made to the draft Islands Trust Policy Statement in the interest of clarity and consistency.

- b. A need to have stronger and clearer language acknowledging the difference between Local Trust Committees (LTCs) and Island Municipalities. The Islands Trust Policy Statement frequently equates LTCs and Island Municipalities, language should be added to make

clear that Bowen Island Municipality has distinct municipal governance role and different statutory requirements compared to the statutory requirements of LTCs. For example, the document frequently uses the term “local planning area” which has no definition and could be better communicated by specifying Island Municipality or Local Trust Area.

- c. Bowen Island Municipality requests that changes be made to the language of the Islands Trust Policy Statement to reinforce the hierarchy of policies so that Values, Directive Policies, and Advisory Policies are clearly distinguishable from each other. BIM requests that the Trust establish a more defined hierarchy so that BIM can have a better understanding of bylaws that are “at variance” with the ITPS as per s. 15 of the Islands Trust Act. This is of importance as expansion of Directive Policies increases this risk of bylaws being seen as “at variance” by the Executive Committee.
- d. There is a concern that terms such as 'appropriate,' 'self-sufficient,' and 'limit the scale of development' are too vague and lack clear, actionable definitions.

Bowen Island Municipality raises concerns with several specific policies.

2. Specific Policies

- a. Policy 3.1.3 Land Back, where BIM gets amenities, it should be for the use of BIM.
- b. Policy 3.1.4 has operational issues, and it should clarified what information is being shared.
- c. Policy 3.1.5 should be clarified to ensure that any proponent of development have a clear understanding of why a decision is being made.

BIM has issues with Part 3, Goal 2, and wishes that some emphasis be put on the community’s culture and heritage as opposed to solely indigenous culture and heritage.

- d. BIM has concerns with policies 3.2.5 and 3.2.6 and the potential of hunting and trapping on Bowen Island; BIM has a use of bows bylaw designed to limit the issues around hunters coming to the island.
- e. Policy 3.2.9 could also be clarified as this seems to be more of an operational nature to be developed locally as a policy or Development Permit Area.

- f. Finally, it is unclear how jurisdictional issues have been addressed, as policies addressing marine harvesting, clam gardens, fish weirs, and fishing may fall entirely in federal jurisdiction.

Part 3, Goal 3 also raises points of concern.

- g. Policy 3.3.4 could be clarified to explicitly state that Garry Oak is the species being considered for protection.
- h. Policy 3.3.8 also has a lack of clarity as to how a small island is defined or if they are the smaller islands in a Trust Area relative to the main island.
- i. Policy 3.3.9 could benefit from better precision as to whether this refers to Island Trust's policies and guidelines or those principles set by the International Dark-Sky Association.
- j. BIM also seeks clarity on how Policy 3.3.11 differs from the Goal 2 policies, if there is no substantial difference, this could be struck to avoid unnecessary repetition.

Part 3, Goal 4 also has policies that raise concerns.

- k. BIM has concerns about how policy 3.4.2 again mentions hunting.
- l. Policy 3.4.6 could benefit from further clarification of what "restrict development" means.
- m. Clarity is also sought in regards to Policy 3.4.9 with regards to how "that could be inconsistent with the object of the trust" is to be interpreted.
- n. it is unclear why the wording in Policy 3.4.10 is different than the wording in Policy 3.4.7 as the more general language of Policy 3.4.7 should cover Indigenous communities.
- o. Policy 3.4.11 should define 'attainable' to ensure consistent interpretation and application.
- p. It is unclear why Policy 3.4.14 uses floor area rather than lot coverage if the purpose is for environmental protection.
- q. Policy 3.4.16 creates concerns for BIM as BIM has opted into provincial regulations for Short-Term Rentals and it is unclear how this proposed policy interacts with provincial policy.
- r. Policy 3.4.17 repeats Policy 3.4.12.
- s. It is unclear whether Policy 3.4.19 is compatible with FireSmart principles.

- t. Policy 3.4.20 raises issues on whether it is within the mandate of the Islands Trust or LTCs to “establish” transportation networks.
- u. BIM also seeks a definition of “rural roadway” as mentioned in Policy 3.4.21.
- v. It is also unclear whether Policy 3.4.22 is within the authority of the Islands Trust or of LTCs.
- w. Jurisdictional issues also arise for Policy 3.4.26 as it is unclear where Health Authorities fit in with this policy.
- x. Policy 3.4.31 could benefit from the inclusion of active transportation as well as active recreation.

BIM has the following comments about the implementation of Goal 5.

- (i) It is unclear how LTCs and Island Municipalities would implement Policy 3.5.5.
- (ii) It is unclear what exactly the “forest management practices” discussed in Policy 3.5.8 would entail.
- (iii) Policy 3.5.11 has issues as the Agricultural Land Commission sets the rules for usage of ALR lands, it is unclear how downstream impacts would be dealt with.

Finally, BIM has suggestions for the implementation section of the Policy Statement. BIM suggests that in the paragraph discussing the statutory bylaw approval process for Island Municipalities, it should be expanded upon, clarifying which BIM bylaws are referred to the Islands Trust. A statement that specifically refers to engagement and communication with Island Municipalities should be added.

In conclusion, the Islands Trust Policy Statement Bylaw strongly aligns with BIM Master Plans. These BIM Plans address a variety of topics such as climate action, housing, cultural and recreational needs, and reconciliation with First Nations. Bowen Island Municipality suggests a few conditions to address concerns of vagueness, clarity of Bowen Island’s unique governance structure in the Islands Trust and reduce the possibility of having a wide spectrum of interpretations.

Thank you,



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Planner 1
Bowen Island Municipality

Cc: Bowen Island Municipal Council

Cc: Jason Youmans, Senior Policy Advisor Islands Trust

Cc: Clare Frater, Director, Trust Area Services Islands Trust

Cc: Bowen Island Municipal Council