

From: ALC Referrals ALC:EX <ALC.Referrals@gov.bc.ca>
Sent: Thursday, December 4, 2025 5:17 PM
To: Islands2050; Nadine Mourao; Jason Youmans
Subject: RE: REMINDER - Bylaw Referral - Trust Council Bylaw 183 Policy Statement

Good afternoon Nadine and Jason,

Thank you for the opportunity to comment on the Islands Trust Policy Statement. ALC staff have previously commented on the draft Islands Trust Policy Statement Bylaw No. 183 in October 2021 and September 2023.

As you may know, unionized staff at the ALC had been on strike and returned to the office at the end of October. As such, due to the current ALC workload, ALC staff are unable to conduct a detailed review of the draft Policy Statement at this time.

In conducting a brief review, ALC staff have the following comments in addition to the comments previously provided:

- Policy 3.4.2 Growth Management – ALC staff echo the Ministry of Agriculture and Food staff's comment which suggests minimizing impacts to agricultural land as a result of community growth and development
- Policy 3.4.11, 3.4.12, 3.4.13, 3.4.16 and 3.4.18 – it is unclear if these policies are intended to apply to land in the Agricultural Land Reserve (ALR). ALC staff recommend clarifying where these policies apply as the ALCA and ALR Use Regulation restrict residential uses in the ALR. A parcel in the ALR is permitted up to three residential units: a principal residence up to 500 m² total floor area, a secondary suite within that principal residence, an additional residence up to 90 m² total floor area for parcels 40 ha or less, or up to 186 m² for parcels larger than 40 ha). Local governments cannot permit more housing on an ALR parcel than what is permitted by the ALCA and ALR Use regulation.

Note that the lack of a specific response by the ALC to any draft provisions cannot in any way be construed as confirmation regarding the consistency of the submission with the ALCA, the Regulations, or any decisions of the Commission.

Sincerely,



Nicole Mak (she/her)

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