

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

Please see the attached letter

Islands Trust Area (Islands 2050)

(Island)



(Signature)

10/17/2025

(Date)

TC 183

(Bylaw Number)

Stephen Duncan, Executive Director Strategic Planning & Performance

(Printed Name and Title)

BC Ferries

(Agency)

October 17, 2025

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 [Islands Trust Policy Statement](#). While we generally support the policy, we do have specific concerns regarding restrictions some aspects of the policy impose on BC Ferries' ability to support the delivery of essential ferry service within the Islands Trust Area.

Under contract to the Province of BC, BC Ferries provides an essential public service to Coastal BC, including to communities within Islands Trust Area. Our routes and services are lifelines that connect coastal communities and support economic activity in island communities. To deliver safe, affordable, and reliable service requires investment in our terminal and marine assets to meet needs today and for the future – these investments include renewing or replacing terminal and marine infrastructure to address condition or service changes.

The draft policy statement includes language that appears restrictive to BC Ferries' ability to design, build and maintain the infrastructure that is, and may become, required to support ferry service in the Islands Trust Area. Below we've outlined sections that could limit or restrict our future design and build needs, and we are seeking revisions to the policy statement to allow more flexibility:

- **3.4.6 Hazardous Areas** – The nature of ferry service requires us to develop within areas subject to sea-level rise, erosion and slope instability. The risks of development within these areas will be managed through engineered designs that aim to protect the local environment and limit disruption via service cancellations. *We recommend broadening the language to allow for risk to hazardous areas to be mitigated through appropriate design measures.*
- **3.5.18 Soil and Fill from Middens and Foreshore Areas of Cultural Significance** – the directive policy to “prohibit alteration, removal or excavation” could limit required construction and development. The related directive **3.2.1 Indigenous Cultural Heritage Sites**, which states “Minimize potential adverse impacts to Indigenous cultural heritage sites...” seems more appropriate. It is unclear which of the two directives supersedes the other. BC Ferries is committed to engaging with First Nations for all land

and marine-based construction and development projects. We are committed to engaging with First Nations for the life cycle of our projects and working to avoid or mitigate issues of concern raised by potentially impacted First Nations. *We recommend revising directive 3.5.18 to “minimize alteration, removal or excavation”.*

- **3.5.20 Setbacks from the Sea** – supporting infrastructure required for ferry services should be permitted where required and setbacks from the sea may not be feasible. *We recommend modifying the language to “taking into account marine transportation needs and best practices recommended by the federal and provincial governments”.*
- **3.5.22 Vessel Moorage** - Generally this directive policy is appropriate, however, we’d like to acknowledge that there may be situations where future ferry related developments could impact sensitive areas where BC Ferries’ vessels moor. Careful design and construction, supported by environmental offsets, should be permitted to mitigate concerns of moorage in sensitive marine areas.

If you have any questions or would like to discuss these proposed policy statement revisions, please reach out.

Regards,

Stephen Duncan
Executive Director, Strategic Planning & Performance

cc: Jeff Groot, Executive Director, Communications
Emma McWalter, Manager Terminal Strategic Planning