From: Islands2050

Sent: Wednesday, June 9, 2021 10:26 AM

To: Islands2050

Subject: FW: Initial Comment on Draft Trust Policy Statement

From: Jennifer Margison

Sent: Thursday, May 6, 2021 5:54 PM

To: Robert Barlow < rbarlow@islandstrust.bc.ca >

Subject: Initial Comment on Draft Trust Policy Statement

To the Trust Programs Committee

I wish to comment on the Draft Trust Policy Statement (TPS) and process after attending the Trust Programs Committee meeting on May 3. I appreciate how much staff work goes into such an endeavor and I do want to recognize their good work and efforts to present the draft clearly.

I have two comments on the process:

- 1. I believe the time for reviewing this draft TPS is far too short for such a complex document with such serious implications for the future of the Trust area. I hope you will agree to extend the deadline for comments prior to a First Reading.
- 2. It is very challenging to determine what has been changed in the draft compared to the previous document and I believe that it would be a much more transparent process if both versions were included in one document and clearly identified. I simply have not had the time to grasp the full extent of the changes. I would like to ask that one document highlighting any changes be considered.

At this point, I have the following comments on the draft TPS:

1. I was very pleased to see that this draft emphasized the environment as in 3.1.1 "Trust Council holds that its primary responsibility is to provide leadership for the preservation, protection, stewardship, and restoration of the unique amenities and environment of the Trust Area." and 3.1.2 "Trust Council commits to place priority on preserving and protecting the integrity of the environment and Indigenous cultural heritage in all decision-making."

It is critically important in the face of ever increasing development pressures on the Gulf Islands that the primacy of environment protection, the "preserve and protect" mandate be **without doubt** the mission of the Trust and the Directives to Local Trust Committees should be very clear about this. I am extremely concerned about efforts of some Trustees to weaken or dilute the overarching environmental protection mandate by pressing for inclusion of "community needs", "healthy communities", "inclusive communities" or "housing" or "transportation". "Community needs, healthy communities, inclusive communities" are human-need focused, vague, open-to-interpretation terms that can be used to justify development of all kinds at the expense of the environment. I am already seeing this happen on my island. These terms have no place alongside the most important consideration the Trust has - to protect above all the fragile and threatened environment, especially in a time of ever-escalating climate crisis.

I am in favor of the inclusion of Indigenous cultural heritage being given prominence. It is long overdue and historically and currently tied to protection of the environment.

2. I am concerned about whether or not the wording in the water section 4.4.6 is in fact strengthened. The change from "neither the density nor intensity of land use is increased in areas which are known to have a problem with the quality or quantity of the supply of freshwater" to ""neither the density nor intensity of land use is increased in groundwater regions where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable" could be problematic and not in fact do anything to protect current water resources from increased density. How would inadequate or unsustainable have to be demonstrated or proven? We are already seeing applicants for high density rezonings hire hydrogeologists who say there is plenty of water for a project, in the face of known water problems in that area. They report on what they were asked to report on and ignore known problems. Water resources is one of the critical pieces of the TPS, of the "carrying capacity" of the islands, a term I was glad to see (is this not what it is all about?) but it needs clarification and more specificity to be useful. And I would like to see even more clarity and emphasis on "that existing, anticipated and seasonal water demand and supply projections are considered and allowed for". What does "allowed for" mean? We need clear language that requires specific attention to and emphasis to "anticipated" and "demand and supply projections" of the already zoned-for density of a neighbourhood when increased density or intensity of land use is contemplated.

Sincerely,	
Jennifer Margison	