Trust Programs Committee May 14, 2021 re: Trust Policy Statement

Submitted by Harlene Holm,

 $\stackrel{\sim}{\sim}$ Please stop the juggernaut. Set aside the rushed process of adopting a flawed rewrite of the Trust Policy Statement (TPS) until island communities have the time and opportunity to review the many proposed changes, omissions and worrisome shifts in wording.

The new TPS was only 'available' at the end of April thanks to a direct email from the Trust Legislative Clerk in response to my request. The latest Trust website offers nothing beyond the 2019 Islands 2050 document accompanied by an illustration of a future highly developed "landscape".

I was a local trustee for Denman Island in late 1970 and early 1980 and worked with fellow trustees and staff to draft the first Trust Policy Statement. "Protection of healthy and inclusive communities" was not envisioned as in the "object" and should not be an "object" in 2021.

"Inclusivity" is an over-used term to describe a vague and virtue-laden social goal. In reality, the Trust was created to protect fragile island ecosystems from the world's most invasive species: people.

I have been plowing through the 67-page document that forms the bulk of the Trust Programs Committee's May 4/21 agenda package. The task has taken and will continue to take countless hours of my volunteer time. The new document rearranges far too much, omits text, edits intent and trendifies [my word] the existing TPS.

Please don't assure me that the public will have ample opportunity to contribute once the Trust Council gives the new TPS First Reading. That has never worked and will never work simply because of the inertia of staff time investment by that point and the Trust Council's formal commitment.

To date, I have numerous specific concerns – many systemic. However, I don't have time, given the May 6/21 deadline for submission to the Trust Programs Committee, to double-check every word of the "new" TPS. Nor is there response time for Denman committees dedicated to the foreshore area, to the conservation of ecosystems and to action on climate change.

With this said, here are my rushed concerns to date (not in order of priority, not tidily referenced using parallel structure and not to take away from my key concern starred above):

- a) The need for definitions in <u>one</u> reference section and not scattered in the document or perhaps simply left to islands to define or abandoned as too difficult to tackle. New terms should be included in the definitions section of the TPS –what is meant by inclusive community, affordable housing (plus the intended tenant/owner of affordable housing), ground water areas, densification areas...?
- b) Replacing "consult with" governments, agents, and developers with the term "coordination with." For example, 3.4.2 –there is a significant difference between "in consultation with" and the new move to coordinate with government of British Columbia, the government of Canada, Crown corporations, municipalities...
- c) 3.4.1 300 m off shore/mid-channel tossed out due to concern for First Nation Rights. This is the classic baby with the bathwater. 3.4.1 was not created to limit First Nations rights but rather to address the Province and federal governments' willy nilly granting of leases and licences to locate and operate 'whatever.'
- d) Dove-tailing with with Ministry of Agriculture goals. For example, 4.1 misses the relationship of agriculture to the adverse effects of climate change. The elephant in the room is made up of pesticides, fertilizers, erosion and excess water use combined with ditching and 4.1.1 –please replace agriculture as "a traditional and valuable activity" with a strong recognition of food sovereignty: "Food Sovereignty is the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems."
- e) Why not clearly state that Crown Land should not be leased/relinquished for development unless equivalent land with greater environmental value is added to Crown land set aside on an island and includes for uses such agriculture, wood lots, utility corridors, roads, housing... Also, advocate that provincial and federal parks' development –from campsites to 'amenities' respect the finite nature of islands in the Trust area.
- f) Please don't remove reference to "utilities" in the section on Transportation because existing policies do not address utilities. In 2021, utilities include infrastructure to provide electricity (hydro, wind turbines, solar panels...), gas, water, sewerage services, communication networks and the delivery system for any similar public service. Utilities can and do impact all critters (including humans), ecosystems and surface water. Additionally, no future development should be allowed to pipe water from elsewhere on island and, at a minimum, use of the most recent 5-year <u>lowest</u> recorded rainfall for the area must be a requirement when considering rain catchment as a developer's alternative to well water. Current use of average rainfall does reflect the existing and increasing extremes.
- g) No TPS recognition and protection of water except vague ground water area protection which is useless without protection of watersheds and wetlands. Ground water needs needs Mom Nature's watersheds and wetland areas plus lakes and streams. At least on Denman Island, an owner can clear-cut, drain and bull doze the

very topography. MOTI can build roads and ditches without regard for the water that pours through MOTI culverts and into the ocean.

- h) How does the TPS rewrite intend to resolve its emphasis on densification while espousing "rural"? Doesn't densification mean building up not out. Densification translates as condominium and apartment complexes in communities across BC and Canada.
- i) The new TPS appears silent regarding root problems resulting from empty houses/air B&B's, logging on private land, real estate prices and the current development onslaught.

Thank you for slowing the adoption process, for taking time to consider my concerns and providing all islanders with the necessary information and process for effectively responding to the new Trust Policy Statement.

Harlene