



Raincoast Conservation Foundation
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RE: Amended Draft Version 2.0 Islands Trust Policy Statement (Bylaw No. 183: Islands Trust Policy Statement Bylaw, 2021)

To Trust Council and Islands Trust Staff,

I am writing on behalf of Raincoast Conservation Foundation in response to Amended Draft Version 2.0 (V 2.0) of the Trust Policy Statement (TPS) for consideration at the first reading scheduled on July 8, 2021. Please note that this letter is a synthesis, rather than a detailed account of our feedback on V 2.0, based on the advice issued by Trust staff in the Briefing section preceding the draft TPS document, which states “that further substantive updates would best be channelled through formal engagement and referral processes after first reading, where specific feedback on specific policies could be most effectively and efficiently received, considered, and integrated into recommendations for second reading” (p.9). We will submit an in-depth account of our feedback when public engagement reopens following the first reading. However, we encourage those reviewing this letter to also review both feedback submissions made by Raincoast, the first in February 2021 and the second in May 2021, as part of the public engagement process.

One of the greatest strengths of V 1.0 was the inclusion of concepts like ‘carrying capacity’ and ‘cumulative effects’ as operational strategies for assessing the impact of built infrastructure on local ecology; these approaches are particularly important with regard to naturally fragile island ecosystems. Unfortunately, as noted in the Briefing section, “the words “carrying capacity” were removed throughout [V 2.0]” (p.8). But it is important to note that carrying capacity, like cumulative effects and the precautionary principle, are not just words. Rather, they are actionable and scientifically tested methods for assessing and measuring the weight of human activity, and informing mitigation responses to lighten that load on the natural environment.

Another strategy removed from discussion in V 2.0 is floor area limitation. A number of Local Trust Committees have been exploring the implementation of this strategy to limit the ecological footprint of built infrastructure. However, according to the Briefing section, this strategy has been removed from consideration because there has not been “enough analysis to support a specific number for such a limitation” (p.9). Like the concept of ‘carrying capacity’, ‘floor area limitations’

have been well-researched. To dismiss this strategy based on lack of analysis is not only out of step with scientific consensus, but would seem at odds with Trust Council's interest in providing affordable housing options within the Trust Area. To continue allowing the construction of massive, single-family occupancy homes not only prices-out lower income earners, but also requires far more resources for construction and maintenance compared to smaller homes, requires significantly more land clearing, and creates a larger ecological footprint. Furthermore, claiming a lack of analysis as an argument when literature exists on the topic is misleading.

Section 1.3 (S.1.3) states that the Trust will be guided by the best available scientific and Indigenous knowledge, and acknowledges the importance of fostering "precautionary and adaptive approaches to decision-making". It goes further to describe the pressure of 150 years of cumulative impacts on the Salish Sea bioregion, identifying 30-40% conversion as the widely accepted threshold for the area, and acknowledging the multi-jurisdictional approaches required to address the complexity of land-use planning in this area. However, it ultimately fails to provide strategies for moving these statements from the page into the sensitive island ecosystems of the Trust area.

While we appreciate that the TPS is a high-level planning document meant to be filtered through the unique lens of each individual island to ensure ensuing policies are tailored to local context, it is also the document that holds each Local Trust Committee and their assigned planning staff accountable to the goals and objectives of the wider federation of the Trust. We assert that it is important to provide each Local Trust Committee with a roadmap for operationalizing the directives outlined in the TPS. Carrying capacity and floor area limitations were two such roadmaps, and we strongly recommend employing the use of such tools to ensure that some of the strong statements made throughout Section 1 are operationalized.

In the interest of strong local implementation, we also recommend that the Policy Statement Implementation (Policy 1.3.1) be amended as a part of this process. This policy allows local jurisdictions to opt out of the directives outlined by the TPS, if said jurisdiction gives reason and/or a conflict exists between the TPS and local policies. Further, this policy is approved by Trust Council and does not require a legislative approval process. The idea that each island can choose which policies they follow and which they dismiss calls the efficacy of the TPS into question. There should be directive policies that are non-negotiable within the Trust Area, for example, the directive policies found throughout *Part 4: Ecosystem Preservation and Protection* of V 2.0 of the TPS. Additionally, if there is conflict between the TPS and local Trust area policies and/or regulations, TPS policies should prevail.

Finally, as we have stated in all of our feedback to the Trust throughout this revision process, it is of the utmost importance that **the final TPS reflects the Trust's duty of care in implementing the Trust Object and ensuring it is operational and enforceable at the local planning level.** As development continues to grow throughout the Trust Area, and climate change impacts become

increasingly tangible, this final point is extremely important to ensure healthy, functioning ecosystems are maintained across the Islands Trust Area.

Thank you for your consideration and ongoing efforts to strengthen Trust policies.

Sincerely,

Shauna Doll
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Raincoast Conservation Foundation