

**From:** Michael Dunn <ed@mayneconservancy.ca>  
**Sent:** Friday, March 4, 2022 4:00 PM  
**To:** Islands2050  
**Subject:** Trust Area Conservancies Joint Statement on the Draft Islands Trust Policy  
**Attachments:** Trust Policy Review Joint Statement 01-03-22 transmittal.pdf

Islands Trust Council;

On behalf of 11 Trust Area conservancies, which over the last six months have collaborated on, reviewed and duly approved the attached Joint Statement, I am submitting this Statement as a contribution to the much needed updates to the Islands Trust Policy.

Our expectation is that these comments and recommendations will be seriously considered in the revisions to the policy document.

Regards,

Michael Dunn

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To the Islands Trust Council;

This Joint Statement represents the shared comments of the undersigned and that it was duly reviewed and passed by the board of directors of each organization.



Pender Islands  
Conservancy



DENMAN  
CONSERVANCY  
ASSOCIATION



Galiano  
Conservancy  
ASSOCIATION



Bowen Island  
Conservancy

**Joint Statement  
On The  
Draft Islands Trust Policy Revisions**

**March 1, 2022**

**Submitted by**

**Mayne Island Conservancy**

**Salt Spring Island Conservancy**

**Galiano Island Conservancy**

**Denman Island Conservancy**

**Lasqueti Island Nature Conservancy**

**Gambier Island Conservancy**

**Gabriola Land and Trails Trust**

**Pender Island Conservancy**

**Thetis Island Nature Conservancy**

**Conservancy Hornby Island**

**Bowen Island Conservancy**

## **Introduction**

This review of the Islands Trust draft Policy Statement is a collaboration of 11 conservancies and land trusts (hereafter referred to as conservancies) that operate within the Islands Trust Area. Collectively, through their members, the Trust Area conservancies represent just under 10% of the total Trust Area population (2016 census) who support and embrace each conservancy's work in their communities. As well, the conservancies, on average, invest around \$1.4 million per year into Trust Area island communities including owning and/or managing around 1,690 ha of lands for conservation. As a result, these non-government organizations have shared interests in Trust Area governance, the development of policies, and how these policies are applied across the island communities. They have visions, missions, and purposes that directly relate to and support the Trust object:

*"... to preserve and protect the Trust Area and its unique amenities and environment for the benefit of the residents of the Trust Area and of British Columbia generally,..." (Islands Trust Act).*

The conservancies have common core interests and represent a range of expertise and local knowledge that is applied to the preservation, protection, restoration, and recovery of the ecologically significant lands and waters within the Trust Area. Collectively, they formally and informally do this through a variety of ownership, covenant, or stewardship models. Most conservancies are engaged in invasive species management, species at risk management, and restoration of degraded ecosystems. These organizations, as well, undertake collaborative initiatives with other community and regional organizations and this includes working alongside Indigenous communities for some of the islands. For these reasons, the conservancies of the Trust Area are uniquely positioned to comment and make informed recommendations on the draft Policy Statement and to assist in and support the implementation of the Trust Area policies.

The Trust Area conservancies recognize the Trust Council has been tasked with an enormous challenge to integrate the mandate to 'preserve and protect its unique amenities and environment' with the need to ensure the well-being and viability of the growing human communities embedded within this environment. Today, this challenge is further compounded by the urgent need to not only encourage and promote practices that can mitigate, adapt to, and restore effects of climate change and biodiversity loss, but also to support practices that equitably address the social and cultural dimensions of our communities (e.g. Indigenous rights and interests, growth, housing, employment, and rural nature).

Further, and with respect to conservation practices, it must be acknowledged that modern "conservation" solutions need to be just and equitable and fully account for the complex human dimensions of our rural environment, including but not limited to housing and what constitutes low vs high impact development. This would be identifying and embracing socio-ecological principles and practices ([www.Conservationgateway.org](http://www.Conservationgateway.org)) that are applied in rural communities elsewhere around the world.

This joint review does not present an exhaustive list of comments or recommendations. Individual conservancies may choose to provide additional commentary through appropriate channels.

## **Positive Additions/Revisions**

We commend Trust Council and staff for this much needed comprehensive update to the Trust Policy Statement. There are many exciting additions and revisions to the document. We further applaud Trust

Council and staff for expanding the sources of information to be used for decision making, and to “ground decision-making in the best available area-based mapping, science, social science, local knowledge, and Indigenous ways of knowing”. However, we recommend revising this statement to “ground decision-making using credible and best available ...”

We enthusiastically endorse wide-ranging new commitments and policies regarding meaningful engagement and cooperation with Indigenous Nations, including governance and cooperative decision-making, heritage preservation and protection, cultivation and harvesting rights, recognition of Indigenous cultural heritage as a unique amenity, and inclusion of Indigenous ways of knowing in many areas of the Islands Trust work. The recognition and commitment to the provincial Declaration of the Rights of Indigenous Peoples is supported. We would add that these new commitments need also to move towards a more inclusive conservation that works with Indigenous NGOs and governance institutions in the development of conservation practices that could include Indigenous Protected Areas and Culturally Significant Areas.

The revisions and updates to Part 4: Ecosystem Preservation and Protection and the expanded context statement are welcomed and supported. We endorse many of the new policies aimed to protect land, freshwater, and marine environments, and the Trust’s adoption of a precautionary approach to preservation and protection in response to the added pressure being applied to our ecosystems and communities by a changing climate, social and cultural needs. With the reality of climate change and human impacts on ecosystems, damage to the natural environment, even if unintended, is inevitable. Therefore, the new commitment to ecosystem restoration efforts is a particularly important addition to the draft Policy Statement, recognizing that past baselines and traditional ecological knowledge will need to be understood to achieve restoration goals. We recommend the Trust Council endorse and actively apply the goals of the UN Decade for Ecosystem Restoration 2021-2030 as part of a global effort to restore degraded ecosystems and prevent further degradation and seek guidance from the international work on integrating conservation with social and cultural dimensions.

We are pleased with Trust Council’s new commitment (4.1.3) to “establish and sustain a network of protected areas throughout the Trust Area, in collaboration with the Islands Trust Conservancy Board, acknowledging that unfragmented connectivity is necessary to preserve ecosystems in sufficient size and distribution to sustain their environmental integrity”. This is much improved over the previous commitment “to work towards” a network of protected areas. We are also pleased to see the addition of a specific list of elements that need protection and restoration (4.1.7) but would like to add “native species even if they are not at risk” to this list. We also support the strengthened directive policy (4.3.6) for local trust committees and municipalities to “prioritize the environmental integrity of the Trust Area by protecting unfragmented forest ecosystems, on a scale of forest stands and landscapes” from the impacts of land use conversion. The intent of the revised directive policy (4.3.8) to “designate protected forest ecosystem reserves where the conservation of native biodiversity and corridors is especially critical and where there should be no extraction” is welcomed but we would propose instead to ‘designate protected forest ecosystem reserves where conservation practices are applied that sustain native biodiversity and corridors and where there should be no industrial extraction’.

We are encouraged to see clearly worded recognition that the Islands Trust lacks the jurisdictional powers to fulfill its legislative mandate independently and must cooperate and collaborate with other organizations and government agencies (1.4). Therefore, we strongly endorse the Trust’s commitment to move from “encourage” to “advocate” when dealing with other government and Indigenous agencies

on issues affecting the environment, climate mitigation and adaptation, sustainable communities, and housing.

We note that Canada has signed onto the pledge to end deforestation, which is defined as the permanent conversion of forest land to other uses. The other side of this equation (but not part of an agreement) is forest degradation, which is the loss of old growth and biodiversity through inappropriate forest practices. In that regard, we are pleased to see the Trust Council's new forest stewardship policies that stipulate forest harvesting in the Trust Area should be limited, small-scale, and that clear-cutting of forests and logging of old-growth trees at any scale are not appropriate activities anywhere in the Trust Area (4.3.3 and 4.3.5). The recognition that the rate and scale of development must come in line with protecting the integrity of the environment and its amenities, is welcomed. There are other proven models of low impact forest harvesting systems in Coastal Douglas-fir (CDF) forests that do not require large-scale removal of trees across the landscape, and they should be supported.

It is critically important that new forest harvesting and tree cutting policies be adopted to protect the ecologically unique and threatened CDF biogeoclimatic zone. Therefore, we enthusiastically support the new coordinating policy (4.3.9) that commits the Islands Trust to seek more jurisdictional authority over forest harvesting, and to advocate for "authority to regulate tree cutting in the Trust Area".

We are pleased the importance of forests, soils, fungal networks, and eelgrass meadows in capturing and storing atmospheric carbon is recognized (1.4). Acknowledgement that ecological systems are complex and play critical roles in mitigating the effects of climate change emphasizes the importance of protecting the Trust Area's ecosystems.

The Trust Area conservancies are delighted to see the new commitment of Trust Council "to seek close collaboration and policy alignment with the Islands Trust Conservancy Board" (3.1.5) in fulfilling the Island Trust's mandate. Many of the conservancies have a rich working relationship with the ITC and expect that relationship to strengthen under the new policy environment.

The draft policy statement recognizes the significance of farms and farm livelihoods within the Trust Area and that they are to be supported. We endorse the new provisions for agricultural lands related to sustainable and regenerative practices, scale of operations, and farm class status considerations. We particularly support the new coordination policy (4.4.6) statement "that total land area subject to the farm class status may include land that is left uncultivated." This is excellent as it encourages landholders to leave parts of their land as undisturbed habitat (e.g., forests, wetlands). In addition, we support the revised policy (4.5.5) that directs local trust committees and municipalities to "include policies that foster the preservation, protection and restoration of productive soils within the Trust Area."

Recognition of the interconnection between healthy and resilient communities and healthy and resilient ecosystems is also a worthy addition to the draft Policy Statement. We agree that diverse and affordable housing options are an essential part of a healthy and resilient community. However, we do not agree with the one-size fits all approach described in Section 6.2. For example, 6.2.4 directs all trust committees to identify appropriate areas for density increases. Densification is an urban approach to affordable housing, which is inconsistent with the Trust's commitment to safeguard the unique rural characteristics and ecological attributes of the Trust Area and to ensure all development is to a rural scale and is "compact, energy-efficient, sustainable, and appropriately situated" (6.2.1). We support the adoption of a uniquely rural approach that could require, for example, all subdivisions to provide some lots that are below market value and covenanted to allow only a small size dwelling. It is difficult to get

community support for multi-dwelling proposals where the large numbers of units are incompatible with conservation of freshwater resources, natural habitat, and/or the character of neighbourhoods. Therefore, Trust should encourage smaller multi-dwelling proposals (e.g., 4-6 units rather than 20) where this is more appropriate.

We are concerned directive policy (6.1.8) "...that growth and development, of any scale or for any purpose, is compact, energy-efficient, sustainable, and appropriately situated in order to minimize greenhouse gas emissions..." may have unintended outcomes. While likely appropriate for some islands, we fear applying this policy on other islands will result in densification in already overburdened village areas and stress on already overused resources. A better approach, and one already in practice, is neighbourhood clusters of small and medium sized rural residential developments surrounded by larger acreages of unfragmented forests.

We endorse the inclusion of a new Trust Council commitment (6.3.1) to support community resilience and liveability by providing appropriately situated public and active transportation networks that encourage the use of electric vehicles and electric bicycles and thereby reduce greenhouse gas emissions and promote health and well-being.

### **Recommendations and Concerns**

This section identifies specific areas the Trust Area conservancies believe may need more consideration, require clarification, or should be amended or removed.

#### Islands Trust Object and Its Meaning

The challenge for the Islands Trust has always been to integrate ecosystem preservation and protection, sustainable communities, and stewardship of resources in its decision-making. Our concern is that the comprehensive revisions to *The Islands Trust Object and Its Meaning* section of the Policy Statement, including the expanded definition and discussion of unique amenities, while welcomed, could be interpreted as de-emphasizing the critical and overarching priority of Trust Council to 'preserve and protect' the integrity of the unique amenities and environment of the Trust Area.

Several new or revised policies in the draft Policy Statement "prioritize" the environmental integrity of the Trust Area. However, there is no clear statement early in the document that says the overarching priority of the Islands Trust is to preserve and protect the ecological and amenity health and integrity of the Trust Area. A clear statement to that effect should be included in section 1.4 of the document.

There has been much loss and degradation of CDF ecosystems over time, thus simply maintaining the current state of our ecosystems should not be the aspirational goal we strive to achieve. To do so would give a false sense of protecting whole ecosystems when in fact it would only be fragments of what had previously been present. To counter this, development must be considered in the context of a shifting baseline (Pauly, D. 1995. *Anecdotes and the shifting base-line syndrome of fisheries*. Trends in Ecology and Evolution 10(10):430), also termed 'generational amnesia' (see Kahn, P.H. 1999. *The Human relationship with nature*. MIT Press pp 110-11), and restoration techniques used to return some of the degraded habitats to their former state. As well, we know that the ecosystems we refer to as natural today are in a large part due to the influence of Indigenous peoples' management practices to derive food and materials sustainably over millennia. In that regard, the conservancies recommend the draft Policy Statement be amended to reflect these crucial considerations (particularly Part 4).

### Regional Governance Policies

We recommend that a directive policy be added that requires Local Trust Committees and Island Municipalities to consider the full Trust Policy Statement prior to making all decisions associated with development proposals or applications, and that Official Community Plans (which are based on Trust Policies) be followed or that a rationale for non-compliance be provided.

### Forest Conservation

The conservation of rare and threatened forest ecosystems within the Trust Area is a difficult task given the complexities of ownership and jurisdictional patterns and, in some instances, the dependency of local incomes on forest resources. The Trust Area conservancies all work toward protecting forests and their associate ecosystems over the long term and hence have specific concerns about how the stewardship of ecosystems is reflected in the revised language of the Policy Statement.

Despite an expanded introduction to section 1.4, we feel the description of the “unique amenities and environment...” does not fully capture the importance of the CDF biogeoclimatic zone in the Trust Area. The significance of the CDF hinges on more than its exceptional biodiversity and high numbers of species at risk. “When ranked for sensitivity to climate change, carbon storage capability, biodiversity habitat, and the degree of human impacts, the Coastal Douglas-fir zone is the most important BC ecosystem.” (Wilson, S.J. and R.J. Hebda. 2008. *Mitigating and adapting to climate change through the conservation of nature*. The Land Trust Alliance of British Columbia). However, the CDF zone (in BC, holds 70-80% of the range of ecological communities described with 97% of those of conservation concern. *Taking Nature’s Pulse: The status of Biodiversity in British Columbia, 2008*) is the least protected in BC with less than 1% of old growth remaining and only 10% of forests older than 120 years. It is also the most altered by post contact activities, including timber harvesting, fire suppression, industrial development, recreation, and urbanization, which has resulted in some of the province’s most fragmented habitats. For these reasons, section 1.4 needs to be revised to better convey the urgency and importance of not only protecting valuable and threatened CDF ecosystems but also implementing conservation practices that restore, enhance and sustain these systems into the future.

As stated previously, we strongly endorse the Trust Council’s new commitment to advocate to the provincial government “to grant Islands Trust the necessary jurisdictional authority to preserve and protect forest ecosystems” (4.3.9). However, the need for more jurisdictional authority in this area, and others, should also be stated much earlier in the Policy Statement (i.e., in 2.2). Simply put, the Islands Trust will remain unable to effectively fulfill its ‘preserve and protect’ mandate until these additional regulatory powers are granted by the provincial government.

Despite the obvious need for more jurisdictional authority over forest harvesting, a new coordinating policy (4.3.9) to advocate for “authority to regulate tree cutting in the Trust Area” requires clarification. Within the ecologically unique and threatened CDF biogeoclimatic zone, new tree-cutting regulations, while emphasizing the protection of forests and continuous forest cover, must also include strategies and criteria to protect old growth or veteran trees, heritage trees (planted to commemorate an event), and culturally significant trees, among others. We propose that all old growth stands and individual trees of significance be mapped and, once identified, be subject to a permitting system. In some areas, it is also important that older second growth forests are reserved to become the old growth forests of the future – a practise that has been advocated internationally as ‘proforestation’. This is a nature-based solution whereby existing forests are protected as intact ecosystems to foster continuous growth for maximal carbon storage and ecological and structural complexity



(forestcarboncoalition.org). The draft language in the Policy Statement needs to be adjusted to clarify the intent of this important issue.

#### Marine/Coastal Conservation

While we appreciate and support the importance of preserving, protecting, and advocating for the sensitive coastal and marine waters of the Trust Area and their species and habitats (4.6), and thus support new policies to prohibit freighter anchorages, oil tankers, and moorage and anchorage sites in eelgrass meadows. However, we believe the very specific directive restricting the building of new private docks (4.6.7) is not necessarily compatible with that goal. The goal is to protect sensitive coastal waters so excluding docks is mapped sensitive areas and prohibiting moorage and anchoring in eelgrass meadows would go a long way to achieve that. In many cases small individual docks make more sense than community docks, which require long-term parking and larger infrastructure. Also, the high density of mooring buoys in some locations (e.g., Montague Harbour) likely has a bigger impact than small private docks on the marine environment. In our view, greater advocacy for better dock design specifications and more inspections to reduce the incidence of derelict docks contaminating shorelines would offer greater protection to Trust Area waters than a complete ban on new private docks. Restricting the use of creosote or other chemical preservatives on pilings and prohibiting new docks in mapped sensitive areas would also be positive steps.

#### Role of Other Government and Non-Government Organizations

There needs to be an expansion of this section (2.2) to specifically recognize the actions and contributions of the Conservation NGOs that work and collaborate with the Islands Trust Conservancy to deliver their own strategic plans and actions that complement the Islands Trust Policy and Object.

#### Development of Goals and Measures

In many instances, the draft Policy Statement refers to actions such as monitoring, evaluating, accounting for, and reporting. However, nowhere does the document state specific goals or aspirational targets or mention the specific measures required to track progress toward the stated goals. Key statements where these parameters must be developed include:

- The draft Policy Statement acknowledges that unfragmented connectivity is necessary to preserve ecosystems (4.1.3) and directs local trust committees and municipalities to “identify, establish, and maintain a network of protected areas of sufficient size and distribution to preserve the ecological integrity of ecosystems in their planning area.” (4.1.6). We strongly endorse these strengthened policies given the critical importance of protected area networks in providing wildlife habitat, preserving biodiversity, protecting groundwater, and ameliorating the effects of climate change. Unfortunately, there are no specific targets identified for the amount of land to be protected. Many islands in the Trust Area currently fall far short of Canada’s stated conservation commitments for lands and waters. The Policy Statement must address this shortcoming by requiring that an ecologically based goal be developed for each island and for the Trust Area as a whole. In support of a worldwide initiative for governments to protect 30% of Earth’s land and water by 2030, the federal government has committed Canada to reach the ‘30 by 30’ goal. We urge the Islands Trust Council adopt this same target and include it in the revised Policy Statement.
- The draft policy (1.3) references research by the Islands Trust Conservancy indicating that some islands in the Trust Area are approaching, or have surpassed, accepted thresholds of human disturbance, above which ecosystem health is known to decline. This is a very important metric to track, and it would be highly desirable to include explicit Trust commitments or policies that

specify the maximum threshold of human disturbance that will be tolerated, both for the Trust Area and for Local Trust Areas. We support the need to equitably set limits on the rate and scale of growth and development (Part 3) and density limits (6.1.12) for the sustainable use of the land base. However, we believe safeguarding the Trust Area's unique amenities requires developing with communities appropriate density limits in concert with caps on human disturbance. The draft language in the Policy Statement needs to be adjusted to address these important issues.

- Section 3.1.11 commits the Trust Council to create an annual plan to achieve the goals defined in the Policy Statement and to direct the Executive Committee to provide a progress report. We support this initiative but recommend that specific measures be developed that can be used to assess outcomes (success, effects, consequences) of implementing the sustainability goals. The Victoria Foundation Vital Signs annual assessment of the wellbeing of the Capital Region would be a good model as it uses internationally recognized sustainability measures. Other good examples are the already produced GHG emissions assessments for each island and the conservation status of each island provided by the ITC for Trust Council.

#### Definition of Terms

The original Schedule 1, that provided definitions of terms, is not part of the revised Policy Statement. Because of their broad interpretations, there are several terms used in the revised document that need to be defined within the context of the Trust Area. These include:

##### *Precautionary Principle*

This is a much-used phrase throughout the draft Policy Statement that warrants a specific definition on how it is intended to be applied within the Trust Area. Given the uncertainty regarding the future effects of climate change in the Trust Area, the Precautionary Principle will need to be applied in all decision-making. It calls for an imperative ("will") rather than a discretionary ("should") approach.

##### *Nature-based solutions*

There is a general description of purpose of this concept but no examples of the actual specific actions that could be taken in the Trust Area that would help to clarify the meaning of this concept and provide guidance to those tasked with implementing it.

##### *Sustainable Stewardship*

This term apparently combines the separate definitions of "sustainability" and "stewardship". The former is the classic definition put forward in 1987 by the Brundtland Commission's *Our Common Future*, where sustainable development was described as 'development that meets the needs of the present generation while not compromising the ability of future generations to meet their own needs'. This was over 30 years ago, and the world has changed. The social, environmental, and economic issues described then are still present and in some cases are worse, and the notion of sustainable development or sustainability is still not consistently applied or embraced. We recommend a revised definition be used that better reflects the primary purpose of the Trust and its object "to preserve and protect its unique amenities and environment". As an example, a more relevant definition could be -the form, function and services provided by the Islands Trust's unique amenities and environment are used and managed at a level that does not exceed their capacity to restore, regenerate and be resilient in order to continue to supply those functions and services to future generations of users.

There are other terms such as regenerative agriculture and forestry and food security that would benefit from explicit Definitions with examples provided within the context of the Trust Area.

## Other Comments

This section provides more detailed comments on specific sections of the draft Policy Statement of common interest to the Trust Area conservancies.

1. The Trust Council has declared that we are in a climate emergency, so it is important that the language used in the Policy Statement reflect the imperative need to take action now to mitigate effects and adapt to the changing environment. Unfortunately, some of the language used such as 'strive to ...' or 'should be ...' in many sections of the document (e.g., 4.1.4, 4.1.5, 6.1.2, 6.1.3, and 6.1.4) indicates a rather weak resolve to tackle these important issues. We recommend that the language be strengthened by using words such as "must" and "must be".
2. We support the new provisions 4.1.9, 4.1.10, and 4.2.10.
3. Section 4.2.8 states that the Trust Council will "strive" to ensure that freshwater use is not to the detriment of in-stream uses. We recommend that wording be revised to state "Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, *prohibit* freshwater use that is to the detriment of in-stream uses."
4. We recommend an additional coordination policy be added as follows: "4.2.13 the Trust Council shall encourage and advocate to government agencies and regulatory bodies for the development of policies, regulations, and incentives to facilitate the adoption of water conservation practices in the Trust Area." This reflects the need to reduce barriers to the implementation of new initiatives (e.g., building codes and bylaws, health codes (gray water collection and use) etc.). The existing 4.2.13 would become 4.2.14.
5. Forest Stewardship policies 4.3.2, 4.3.3, and 4.3.4 need to be revised to substitute "must" for "should".
6. As currently written, the second bullet in section 4.3.2 does not make sense. We recommend the following re-wording: "The remaining stands of relatively undisturbed forests and ecosystems within the Coastal Douglas-fir and Coastal Western Hemlock biogeoclimatic zones must be preserved and protected and restoration practices applied to restore degraded areas."
7. We recommend adding an additional bullet to section 4.3.2 as follows:
  - Maintaining intact and regenerating forest cover is a key component of a greenhouse gas reduction strategy.
8. We support the general intent of section 4.3.3 "that forest harvesting in the Trust Area should be limited, small-scale, sustainable, regenerative, supportive of climate action ...". However, much of the terminology requires clarification or revision. Specifically, does "forest harvesting" include only commercial activities or a more expansive application to land clearing for developments and firewood harvesting at the local level? Also, 'regenerative' is not a technical term that is generally applied to forest harvesting. A better term would be "renewable" if the intent is to ensure all harvested forests are successfully regenerated. Finally, the phrase "supportive of climate action," requires clarification. As presently worded, the statement appears to indicate that forest harvesting can provide some benefits in the context of climate action.
9. We recommend adding 'non-government organisations (Farmers institutes, food coops, agricultural/farm land trusts)' to section 4.4.1.
10. Many of the policies have been strengthened by usage of "shall" instead of "should" but others have been weakened by replacing "ensure" with "strive to ensure". While the former are positive changes, the latter are not. As noted in earlier statements, we support the use of

stronger terms as opposed to discretionary ones particularly in cases where the need for action is an imperative.

11. We suggest changing the language used in reference to natural and cultural heritage protection -- sections 5.1.3, 5.1.4, 5.1.5. In each case the current wording is in the form: "Local trust committees and island municipalities SHALL in their official community plans and regulatory bylaws, identify, preserve, protect, and support the restoration of Indigenous cultural heritage in their planning area." Presumably, the intent is to identify, preserve, and protect cultural heritage as well as support restoration where it has been compromised. However, the current wording indicates the restoration of cultural heritage should be identified, preserved, protected, and supported.
12. Directive policy 6.3.5 should be re-written to be consistent with wording in 4.4.4. We suggest: "Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, direct the location, design, and construction of roads and utility corridors to minimize the impact on, and fragmentation of, protected area networks, contiguous forests, watershed, ecosystems, freshwater networks, groundwater recharge areas, agricultural lands, coastal and marine areas, or indigenous cultural heritage in the Trust Area."