

From: Alix Hodson Deggan [REDACTED]
Sent: Saturday, December 13, 2025 10:51 AM
To: Clare Frater; Islands2050
Subject: Re: Recommendations for draft TPS

Hi Clare,

Many of us are finding that our hard work is being ignored. Will this be looked at in the 2050 email account?

It is of vital concern that the residents have input into the TPS as Minister Ravi Kahlon directed.

Thankyou for your response and Have a well earned break.
Alix Hodson

On Fri, Dec 12, 2025 at 3:27 PM Clare Frater <cfrater@islandstrust.bc.ca> wrote:

Hello Alix, Deggan

Thank you for this submission. Can I please ask that you re-submit it to the Islands 2050 project e-mail account at islands2050@islandstrust.bc.ca. You'll then receive an auto-response advising how staff will manage the correspondence and can let us know if this is not acceptable.

I appreciate your dedication to reviewing the draft document. I wish the best for you and your loved ones over the holiday season.

Kind regards,

Clare Frater (she, her)
Director, Trust Area Services
Islands Trust | T 250.405.5192

From: alix hodson [REDACTED]
Sent: Thursday, December 11, 2025 3:16 PM
To: Jason Youmans <jyoumans@islandstrust.bc.ca>; Clare Frater <cfrater@islandstrust.bc.ca>

Cc: KEES LANGEREIS [REDACTED] Steve Wright [REDACTED]

Subject: Recommendations for draft TPS

December 11. 2025

Neighbourhood discussion on Gabriola

Jason Youmans and Clare Frater,

Islands Trust

Please consider this analysis and the recommendations on the Proposed New Trust Policy Statement (TPS).

To be true to the Islands Trust Act, preservation and protection of the natural environment should be the overarching priority and everything else must fall under that.

Unfortunately, the draft presented to Trust residents for review does not address the object of the Islands Trust Act: to preserve and protect the trust Area, its unique natural amenities and environment.

The recommendations made in the attached analysis tries to correct this oversight. PLEASE PLACE THIS DOCUMENT ON RECORD.

Thankyou for your consideration,

Alix HodsonDeggan

Analysis and Recommendations of the proposed New Draft Trust Policy Statement

Part 1: Section 4 Purpose of Trust Policy Statement

This new second paragraph directs protection of areas of natural or cultural significance entirely to the Trust Conservancy, i.e. away from the Trust Council Local Trust Committees.

This responsibility lies with all bodies of the Islands Trust. The 2023 draft TPS language should be used: “The Act establishes Islands Trust as a special-purpose provincial government agency equipped with a suite of land use planning powers and a *conservation-oriented mandate* to preserve and protect the region in cooperation with others. This unique governmental mandate was defined in Section 3 of the *Islands Trust Act* and is commonly referred to as the “Islands Trust Object”.

Section 1.4

The words “should be” should be replaced with “must be”. The words “where possible” should be omitted.

The Act stipulates that official community plans and bylaws required to be submitted to Executive Committee or Trust Council under the Act **must not be approved** if they are contrary to or at variance with the Policy Statement. This ensures that the

Islands Trust Object is at the core of all planning and land use management decision-making in the Islands Trust Area”.

Page 7 under “Directive Policies” states: “...regulatory bylaws of LTCs or Island municipalities must be consistent to avoid rejection or objection when presented by LTCs or island municipalities for consideration or approval.

Part 2 – General Guiding Principles

Section 2.1

The word “**priorities**” should be included in this Guiding Principle as in the following paragraph: In its efforts to carry out the Islands Trust Object, Trust Council commits to the following set of shared principles **and priorities** to guide daily planning and decision making by all bodies across the Islands Trust Area.”

Guiding Principle 2.1.3 Limit the Rate and Scale of Development

This principle should be a Directive that reads: Limit the rate and scale of **growth** and development

Guiding Principle 2.1.5. - Take Guidance from the Precautionary Principle to be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there **is uncertainty** over the potential for serious or irreversible damage from development.

***This Guiding Principle should be a Directive under Ecosystem Integrity 3.3.1 – 3.3.9**

Guiding Principles 2.1.6 - Account for Cumulative Effects “...to prioritize accounting for cumulative effects of existing and proposed development to avoid detrimental effects on watersheds, **groundwater supplies**, culturally sensitive areas and cultural heritage sites, and species and their habitats.”

***This principle should also be a Directive under Ecosystem Integrity 3.3.1 – 3.3.9. Only Directive 3.5.24 (Marine Docks) refers to cumulative effects**

Add a policy after Guiding Principal 2.1.7

***Foster Public Participation in Decision Making.**

“Foster public participation in all government decision- making processes and provide opportunities for public input in establishing OCPs and regulatory bylaws.”

***There should be a guiding principle that it is a priority to preserve and protect the natural ecosystems of the Trust islands. The lack of such a policy implies there is no**

commitment to protecting the environment as required by the Trust Object. Our concern is reinforced by the fact that Trust Council published an interpretation of “unique amenities” as including housing, livelihoods, infrastructure and tourism. Under that interpretation of the mandate, **if protection is given to human development, there is no real protection for the environment.** We interpret “unique amenities” as was interpreted by 1986 Ministry of Municipal Affairs/Islands Trust "[Position Paper; The Object of the Islands Trust: Renewing the Consensus](#)" and the 2021 "[Discussion Paper: The Islands Trust Object: Past, Present and Future](#)".

*There should be a guiding principle that the word “environment” means the “**natural environment.**” Without this definition, the word “environment” can refer to anything that exists in the world.

Goal 3 - Preserve and Protect Healthy and Biodiverse Ecosystems – Directive Policies – Ecosystem Integrity

New Directives:

New Directive Policy Limiting Growth and Development- Recommendation- to require each LTC to assess growth limits and then set those limits as per the 2023 draft TPS.

New Directive - 3.4 -Recommendation -that increased density should **only be for affordable housing or worker housing always with housing agreements** to assure affordability to persons at specific low-income levels

New Directive -3.4.16 – Recommendation -**protect rural character and reduce impact on the natural environment**, LTCs must establish a limit on the size of single-family residences on their islands

New Directive – 3.5 -Recommendation -ensure that local knowledge /experience with water shortages is considered on an equal footing with estimates based on computer models.

New Directive -3.5.4 -Recommendation -use land-use planning tools such as large lot zoning and DPAs to protect ground and surface water by protecting groundwater recharge areas, forests, and native ecosystems.

New Directive -3.5.7 -Recommendation -use land use planning powers **to ensure that groundwater users are not harmed by pollution from septic systems.**

New Directive 5.2.6- Recommendation -use land-use planning powers for efficient use of the land base without exceeding any density limits defined in their OCPs.

Changes to proposed draft policies Directives:

Directive 3.3.2 -Recommendation: identify and prioritize the preservation and protection, in their OCPs and regulatory bylaws and address means to prevent further loss or degradation of freshwater bodies, watercourses, recharge areas, wetlands and riparian zones and protect aquatic wildlife.”

Directive 3.3.3 -Recommendation: identify and protect unfragmented forest ecosystems, the remaining stands of relatively undisturbed Coastal Douglas-fir, Western Red Cedar, Arbutus, Garry Oak and Coastal Western Hemlock and their associated ecosystems within their local planning areas from potentially adverse impacts of growth, development and land-use.

Directive 3.3.5 Watershed Ecosystems -Recommendation: identify and prioritize to prevent further loss and degradation the preservation, protection, and restoration of watershed ecosystems, freshwater sources, groundwater recharge areas, wetlands and marshes

Directive 3.3.6 Marine Shoreline and Nearshore Areas -Recommendation - identify and prioritise the preservation and restoration of eelgrass meadows kelp forests, forage fish spawning area, clam beds, estuaries, tidal salt marshes, mud flats and other marine systems.

Goal 4 - Directive Policies – Managing Growth and Development (Heading should be changed to “Limiting Growth and Development”)

3.4.1 Sustainable Development – Recommendation -ensure development is compact, energy efficient and appropriately situated on island where there is an ample supply of freshwater and where it has been scientifically assessed and proven that such developments will not affect the ground water through sewage contamination.

3.4.2 Limit Growth and Development – Recommendation -establish appropriate density and population limits to prevent sprawl, conserve freshwater resources, protect groundwater recharge areas, prevent septic contamination, maintain rural character, prevent salt water intrusion and protect unique amenities and natural environment of the trust area.”

3.4.5 Climate Change Mitigation & Adaptation – Recommendation -this item should be under a separate Goal with specific Directives. Climate change was identified as a key issue in past public engagement and the Trust declared a climate emergency in 2019.

3.4.11 Suitable Locations for *Affordable Housing – Recommendation -identify suitable locations that could support increased density for the development of affordable housing where there is sufficient water and sewage disposal capacity, where it will not adversely affect other groundwater users, groundwater recharge areas, and native ecosystems.”

*An online search provides many definitions of “attainable housing” all generally aimed at persons who cannot afford market housing. The use of this term requires a definition in the Glossary with a precise income level that is targeted. **Without this, the policy allows for LTCs to make zone changes and give other benefits to developers of any type of market housing and will not necessarily produce housing for those persons providing community services.**

3.4.13 -Clustered Housing – Recommendation -Omit -see 3.4.14 – 3.4.15 (below)

3.4.14– Floor Areas and Lot Coverage Limits – Recommendation 1-The use of **FAR (floor area ratio) or “Flexible Housing”** is inappropriate for the islands to use as a zoning tool because it allows several residences on properties currently zoned for one residence. Additional residences, means more residents which has major impacts on the environment, more water use, more sewage produced, more cars, and greater impact on community

infrastructure and services. **This Directive is poorly worded when read in conjunction with the Glossary definition of “density” and will be problematic.**

Recommendation 2 -Set lot coverage limits for residential development to minimize negative environmental impacts

3.4.15 – Housing -Recommendation -Prioritize the processing of rezoning applications from non-profit housing providers and public agencies, and the processing of housing agreement bylaws for affordable and special needs housing.

Directive Policies - Waste, Emissions and Pollutants

3.4.26 - Disposal of Waste - Recommendation -establish requirements for the location and siting of new wastewater disposal systems to prevent adverse impacts and to protect the entire population, and environment from contamination and pollution of the freshwater supply.

Goal 5 - Directive Policies - Freshwater

Foster Sustainable Stewardship of Lands and Waters - *ITC recognizes that sustainable use of lands and waters in the IT Area is **essential** to the long-term well-being and resilience of ecosystems in the IT Area and the communities that depend on them.*

3.5.1 Freshwater Sustainability – Recommendations -ensure that neither the density nor intensity of land use is increased in watersheds, recharge areas **or neighbourhoods** where there is likely to be or already is, a problem with the quality or quantity of the supply of freshwater or resupply of groundwater to the area. Seasonal demands for freshwater or groundwater must be considered and allowed for

3.5.2 - 3.5.3 Freshwater – Recommendation -when considering zoning changes or increases in density, ensure that (see 3.5.1).

3.5.3 Freshwater Self-Sufficiency -Recommendation -identify which islands are not self-sufficient in water, take action to minimize additional dependence on off-island water and assure other islands maintain self-sufficiency in water.

Directive Policies – Forest Lands

3.3.2-3.3.3 -Forest Ecosystems – Recommendation -ecosystems and ensure the preservation and protection of unfragmented forests, with a particular focus on the maintenance of and restoration of their ecological integrity and protect these areas from **potentially adverse impacts of growth, development and land-use.**”

***Goal 6 - Climate Change Mitigation & Adaptation.**

There is little focus on climate change in this draft; yet it was one of the 3 identified “pillars” of Analysis & Public Engagement Phase II document. As well, the Trust declared a Climate Emergency in 2019. There were Directives on Climate Change suggested in the Islands 2050 - Fact Sheet that are not reflected here. It is only mentioned briefly in Directive 3.4.5.

Changes to Glossary:

Environment - Environment as a term is most commonly used to describe the *natural environment*, which includes physical components such as air, temperature, landforms, soils, and bodies of water, as well as living components such as plants, animals, and microorganisms. The natural environment exists in contrast to the *built environment*, which includes all human-made elements and processes. Damon P. Coppola, in Introduction to International Disaster Management (Third Edition), 2015.

Density - Density is regulated through zoning that states the number of residences, or businesses allowed on a particular property.

Local Knowledge – Understandings and in-sights that individuals have about their own community culture, neighbourhood, environment, and practices, often accumulated through personal experience. By valuing and integrating local knowledge, communities can contribute to land use discussions, preserve cultural heritage and promote more effective decision-making aligned with their unique needs and circumstances.” Based on the definition of local knowledge at: <https://www.vaia.com/en-us/explanations/anthropology/museum-studies/cultural-heritage/>

Attainable housing - the requirement for a housing agreement that assures affordability to people providing island services and does not subsidize developers of expensive housing.

***Unique Amenities** – are the unspoiled natural amenities that pertain to local environmental stewardship.

In the letter sent to Laura Patrick of April 28, 2025, the serving Minister Ravi Kahlon clarifies the unique amenities debate.