

From: Renée Stephen <[REDACTED]>
Sent: Saturday, July 3, 2021 11:25 AM
To: john.horgan.MLA@leg.bc.ca; MAH.minister@gov.bc.ca;
josie.osborne.MLA@leg.bc.ca; MAH.DMO@gov.bc.ca;
ENV.Minister@gov.bc.ca; George.heyman.MLA@leg.bc.ca;
DM.ENV@gov.bc.ca; AGR.Minister@gov.bc.ca;
lana.popham.mla@leg.bc.ca; IRR.Minister@gov.bc.ca;
murray.rankin.MLA@leg.bc.ca; doug.caul@gov.bc.ca;
FLNR.Minister@gov.bc.ca; adam.olsen.MLA@leg.bc.ca;
douglas.routley.MLA@leg.bc.ca; adam.walker.MLA@leg.bc.ca;
nicholas.simons.MLA@bc.leg.ca; jordan.sturdy.MLA@leg.bc.ca;
Islands2050; Trustees; information; Executive Admin; Peter Luckham;
Russ Hotsenpiller; directorsgi@crd.bc.ca; gholman@crd.bc.ca; Sue
Ellen Fast; Michael Kaile; Laura Busheikin; David Critchley; Scott
Colbourne; Kees Langereis; Dan Rogers; Tahirih Rockafella; Jane
Wolverton; Kate-Louise Stamford; Alex Allen; Grant Scott; Peter
Johnston; Timothy Peterson; Jeanine Dodds; David Maude; Benjamin
McConchie; Deb Morrison; Laura Patrick; grove@islandstrust.bc.ca;
Paul Brent; Lee Middleton; Cameron Thorn; Steve Wright; Doug
Fenton; Donald Clarke; Linda Adams
Cc: gsjuberg@driftwoodgimedia.com; onthecoast@cbc.ca
Subject: Concerns over Trust Policy and Purpose First Reading

Hello Trustees, MLAs, MPs, and Premier Horgan.

As someone new to the Trust Area, but whose family have lived here since the 60s, I make a point of reading our Island Trust minutes whenever I can. That's how I became aware of our new Trust Policy statement, buried near the back of a hundred-odd-page document, prior to First Reading.

As a policy vision I was impressed: it's bold and important. Adopting at its heart the precautionary principle, and a commitment to adaptive management and reconciliation, are essential. I read on with interest.

I was profoundly disappointed, a few pages later, to see the Trust abrogating those principles *in the very same document*.

It has done this in the following ways:

The process itself. In adaptive management a key recognition is that humans are part of, rather than actors external to, the ecosystem. Its process requires that we be part of the solution -- must be, for any approach to succeed. And yet:

1. The Trust gathered minimal and pro-forma feedback on the process and principles from our 60,000-strong Trust membership (26,000 residents, 10,000 non-resident property owners and 28,000 Coast Salish People).

This has resulted in you getting input from a *tiny* percentage -- less than 1%. This was done via survey and conversations on ferries pre-pandemic. Hardly representative. And it is difficult to tell how much meaningful input First Nations have had, other than the Trust sending out emails and checking a box. Can we trust the next round will be more meaningfully inclusive?

2. The Trust asked three *very* broad questions, but used these as a mandate to draft extremely specific policy with no preliminary or iterative steps, contra to adaptive management best practice. Can we trust that there will be meaningful interim steps now?
3. The Trust insists on a strict timeline and engagement method, despite a catastrophic global pandemic and despite demand from constituents for more consultation. Can we trust this lack of flexibility won't continue?
4. The Trust appears to be focussing on the desires of Trustees themselves to meet an electoral deadline, rather than the needs of a community to develop our governing principles for the next 30 years. Can we trust political motivation is not also going to be the future default?

An ecosystem approach. In adaptive management, ecosystem conservation *must* seek community-based and collaborative solutions to succeed. To support this, it must focus on *impacts*, not specific mechanisms of damage; these can change too quickly. Yet,

1. The Trust is banning entire categories of use (docks and desalination), when an adaptive approach would be to, e.g. set brine-concentration-effluent limits, silt management requirements, or eelgrass protection construction standards. Can we trust this "whack-a-mole" reactive approach to ecosystem-wide problems won't continue beyond this draft?
2. The Trust is not leveraging existing knowledge of other jurisdictions; e.g. there are *already* eelgrass conservation guidelines developed by another BC municipality! Can we trust you won't keep reinventing the wheel in other ways, too, instead of participating in intra-jurisdiction knowledge-sharing across all levels of government?
3. The Trust is neither committing to set meaningful ecological standards, nor is it committing to *monitor* them as part of active management practices! The precautionary principle is meant to be used *until* there's data, not instead of it. Can we trust that you won't use "failure to measure" as a reason to quash community-based or creative mitigations and innovations?
4. The Trust fails to speak to *existing or ongoing* impacts at all, e.g. from old docks and desalination, despite strong evidence that these require mitigation as well. Can we trust that you won't make other ecological decisions via a "pull the ladder up" instead of a holistic approach?

Trust. I urge the Trust to consider that these profound mismatches between the Trust's mandate and its actions will *continue* to result in community outcry and concern, right when you are asking for more power. Consider:

1. The Trust's *existing* powers have not been used to bring these principles into being already! Our bylaws are instead "and only this"-type of legislation; they are reactive and restrictive, not creative or integrative. But they don't have to be! How can we trust this policy statement will change this profoundly short-sighted approach?

2. The Trust wants to limit uses LTCs haven't even *tried* to mitigate now! E.g. *no* bylaws now require water harvesting or greywater reclamation for new builds, yet we have water shortages resulting in density restrictions... yet, still, only reactive, not proactive, bylaws exist. And where are ecological impact or construction transparency standards for docks in the Trust area now?


Given these examples, how can we trust you will commit to *even more difficult* ecosystem-based management approaches in the future?

3. How are we measuring the effectiveness of our current bylaws against these broader ecological goals (beyond someone checking a box on a checklist, I mean)? How are we accounting for perverse incentives differently? And how can we trust this will get any better with more sweeping language?

Now, when we require even more complex, creative, community- and island-specific approaches to mitigate development and environmental impacts, the Trust is failing in basic community-based problem-solving, which is where creative solutions emerge.

Can we trust that this outdated, rigid, top-down approach will not be how you will proceed with the rest of the implementation as well?

Thank you,
Renée Stephen


Salt Spring Island, BC