



Policy Statement Amendment Project

What We Heard in Phase 3 Public Engagement and What We Have Done in Response in the Draft Policy Statement (April 2024)

Policy Statement Amendment Project has had three phases of public¹ engagement which have included both online and in-person activities.

- Phase 1 - to gather community values, concerns related to climate change, and opportunities to preserve and protect the Islands Trust Area
- Phase 2 - to gather input on draft policy directions related to climate change and affordable housing
- Phase 3 - to gather input on the first draft of the new Policy Statement

In June and September 2022, after receiving engagement feedback from First Nations, referral agencies, and the public during Phase 3, the outgoing 2018-2022 Trust Council passed [32 resolutions](#) requesting staff to amend the Policy Statement Bylaw No. 183, for review by the new 2022-2026 Trust Council and its committees.

The purpose of this document is to assist in capturing how public input from Phase 3 of public engagement influenced the project. It identifies the key themes from Phase 3 (as identified in [ISL's Engagement Summary Report](#)) and provides an outline of what has been done in response in the revised draft dated.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
General	A need for a balance between environmental protection and sustaining residents' valued communities and way of life.	The revised draft addresses both environmental protection and the fostering of sustainable, inclusive, and resilient Communities. As Trust Council considers changes to the Policy Statement, it will undertake careful and reasoned balancing of the importance of preserving and protecting the Trust Area, and its unique amenities and environment.
	Commit to making decisions based on objective, scientific data.	A proposed Trust Council guiding principle within the current draft is relevant to this feedback: 2.1.7 Foster Informed and Balanced Decision Making <i>To be informed by a broad range of sources in its decision making processes, including the best available science, Indigenous Knowledge, and local community knowledge.</i>
	Appreciation for addressing climate change and agreement that development should be carefully managed to protect from further impacts.	Staff noted these comments as they undertook re-drafting.
	Participants voiced concerns about the precautionary principle, noting that it is open to	As per Resolution 16, a proposed Trust Council guiding principle within the current draft is relevant to this feedback:

¹ Public input is one of many streams of input informing the Policy Statement Amendment Project, along with input from interested and affected parties, First Nations and Indigenous community members, referral agencies, Trust Council and its committees, and staff.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	<p>broad interpretation, could be contradictory to scientific evidence, and could be manipulated based on emotions and personal bias. Some see the precautionary principle as a means to stop potential progress.</p>	<p>2.1.5 Take Guidance From the Precautionary Principle <i>To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there may be uncertainty over the threats of serious or irreversible damage from development.</i> In addition, a glossary definition has been added to ensure there is a common understanding of the precautionary principle.</p>
<p>Advocacy</p>	<p>There was mixed support or lack of support for advocacy in a variety of areas (e.g. removal of abandoned and derelict vessels, oil spill prevention and response, and new tree-cutting authority for local trust committees).</p>	<p>Advocacy policies have been removed from the Policy Statement current draft (including in relation to request for new tree-cutting authority as per Resolution 15). It is important to note that Trust Council may continue to advocate on some topics regardless if a topic is included in the Policy Statement. Trust Council has stated it will not proceed with seeking authority for local trust committees to bring in tree-cutting bylaws.</p> <p>A proposed Trust Council cooperation principle within the current draft is relevant to this feedback:</p> <p>2.2.3 Work Towards Strategic Inter-Agency Coordination <i>To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.</i></p>
<p>Ecosystem preservation and protection</p>	<p>There was general support for the following concepts:</p> <ul style="list-style-type: none"> • monitoring the effects of climate change and other influences on the ecosystem • using nature-based solutions • limiting development in areas where there is inadequate freshwater • valuing agriculture and forestry through small-scale harvesting practices • banning industrial-scale clear-cutting and logging of old growth trees • keeping marine dependent land uses away from eel grass and kelp forests • advocating to other levels of government to prohibit ocean dumping and commercial freighter 	<p>The revised draft contains policies that are relevant to this feedback:</p> <p>3.4.5 Climate Change Mitigation and Adaptation <i>Identify land use strategies, and consider nature-based solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.</i></p> <p>3.5.1 Freshwater Sustainability <i>Ensure that neither the density, nor intensity of land use is increased in watersheds where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable.</i></p> <p>3.5.6 Forest Lands for Sustainable Management <i>Retain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the area’s unique amenities and environment.</i></p> <p>3.5.12 Sustainable Agriculture <i>Strive to preserve, protect, and encourage sustainable farming and sustainability of farming.</i></p> <p>3.3.5 Marine Shorelines and Nearshore Areas</p>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	anchorage sites	<p><i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i></p> <p>2.2.3 Work Towards Strategic Inter-Agency Coordination</p> <p><i>To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.</i></p>
Freshwater stewardship	Many participants indicated they feel that water is finite and want to protect it.	The following directive policies within the revised draft are relevant to this feedback:
	There was strong support for Islands Trust to advocate for rainwater as a supplemental water source; and as a primary source.	<p>3.5.1 Freshwater Sustainability</p> <p><i>Ensure that neither the density, nor intensity of land use is increased in watersheds where the quality or quantity of the supply of freshwater is likely to be inadequate or unsustainable</i></p>
	Participants shared an overall support for restricting development in areas where freshwater is limited, while others did not want it to be an excuse to limit development.	<p>3.5.2 Freshwater Demand and Supply Projections</p> <p><i>Ensure that existing, anticipated, and seasonal water demand and water availability are considered.</i></p> <p>3.5.4 Freshwater Self-Sufficiency</p> <p><i>Ensure that islands are self-sufficient in their supply of freshwater</i></p>
	Participants strongly disagreed with the proposed prohibition of desalination.	As per Resolution 9, the previously proposed directive policy on desalination was removed.
Coastal and marine stewardship	Overall support from participants for Islands Trust to prioritize the protection of the coastal and marine environment.	Staff noted these comments as they undertook re-drafting.
	Participants were evenly divided between those that support and do not support prohibiting hard seawalls. Participants also noted the need for flexibility to decide what is best in each case.	<p>As per Resolution 14, the proposed policy about seawalls has been redrafted to consider guidelines as found in Green Shores or other soft shoreline approaches to set requirements for shoreline preservation.</p> <p>3.5.18 Soft Shoreline Protections</p> <p><i>Consider and foster soft shoreline approaches first, such as those identified by the “Green Shores” program, to set requirements for shoreline preservation and to mitigate erosion of shoreline and foreshore cultural heritage sites.</i></p>
	Participants strongly opposed prohibiting private docks. Some suggested that a blanket policy was not appropriate and that the need for a dock	As per Resolution 12, the proposed policy has been redrafted to limit or prohibit new docks in certain circumstances.

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	should be assessed on a case-by-case basis.	<p>3.5.21 Private Docks <i>Limit or prohibit new private docks in areas identified as culturally significant by Indigenous Governing Bodies and Indigenous Knowledge Holders, in areas that provide critical habitat for species at risk, and in areas of recreational significance; and consider the cumulative effects of docks.</i></p>
	Participants noted concern over degradation of the foreshore and stated they would like to protect it against continued erosion while others are concerned for the eelgrass meadows and kelp forests and want to protect them against harm from dumping and anchoring.	<p>The revised draft continues to include a directive policy relevant to this feedback:</p> <p>3.3.5 Marine Shorelines and Nearshore Areas <i>Identify and prioritize the preservation, protection, and restoration of eelgrass meadows, kelp forests, forage fish spawning areas, clam beds, estuaries, tidal salt marshes, mud flats, and coastal wetlands.</i></p>
	Participants supported shoreline setbacks and keeping marine dependent land uses away from these sensitive areas.	<p>The revised draft continues to include a directive policy relevant to this feedback:</p> <p>3.5.17 Setbacks from the Sea <i>Consider the current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea, taking into account best practices recommended by federal and provincial governments.</i></p>
Forest Stewardship	Participants strongly disagreed that Islands Trust should advocate to the Provincial government to regulate general tree cutting or forest management by individual property owners.	<p>As noted above, advocacy policies have been removed from the Policy Statement draft (including in relation to tree-cutting as per Resolution 15).</p> <p>A Trust Council cooperation principle in the revised draft, however, is relevant to this feedback:</p> <p>2.2.3 Work Towards Strategic Inter-Agency Coordination <i>To work towards establishing effective inter-agency coordination mechanisms with different levels of government, academic institutions and organizations who have important roles to play in supporting the Islands Trust Object.</i></p>
	There was strong support for the prohibition of industrial-scale clear-cutting. Some participants commented that management of forestry is needed on public lands and others shared that removing trees promotes healthy forests.	<p>As noted above, advocacy policies have been removed from the revised draft (including in relation to tree-cutting as per Resolution 15).</p> <p>The revised draft continues to include directive policies relevant to this feedback:</p> <p>3.3.3 Forest Ecosystems <i>Identify forest ecosystems and prioritize the preservation, protection, and restoration of unfragmented forest ecosystems, with particular focus on remaining stands of relatively undisturbed Coastal Douglas-fir and Coastal Western Hemlock and their associated ecosystems</i></p>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
		<p>3.5.6 Forest Lands for Sustainable Management <i>Retain large land holdings and parcel sizes to support sustainable forest management practices that are compatible with preservation and protection of the area’s unique amenities and environment.</i></p>
	<p>Some also noted that the Policy Statement should further address measures needed to mitigate risk from forest fires.</p>	<p>The revised draft includes a directive policy relevant to this feedback:</p> <p>3.5.8 Forest Lands and Wildfire Risk Management <i>Identify land use strategies that mitigate wildfire risk and that are appropriate to the unique biogeoclimatic zones and settlement patterns of each local planning area.</i></p>
	<p>Participants also commented that education and tree planting programs are needed for the sustainability of the forests.</p>	<p>A Trust Council cooperation principle within the revised draft is relevant to this feedback:</p> <p>2.2.5 Provide Public Education Opportunities <i>To provide education opportunities to Islands Trust Area residents, communities, local organizations, and visitors, highlighting tangible ways they can contribute to preserving and protecting the region’s unique amenities and environment, while respecting the confidentiality interests of Indigenous Peoples and Indigenous Governing Bodies.</i></p>
Agricultural stewardship	<p>There was concern that agriculture had been removed as a “valued activity” in the Draft New Policy Statement.</p>	<p>As per Resolution 13, the revised draft includes acknowledgement of the value of sustainable agriculture by including a directive to preserve, protect, and encourage it:</p>
	<p>Many participants indicated they support sustainable and regenerative farming practices, and that education is needed to support this.</p>	<p>3.5.12 Sustainable Agriculture <i>Strive to preserve, protect, and encourage sustainable farming and sustainability of farming.</i></p>
	<p>There was concern over the use of the term “small-scale” with respect to agriculture.</p>	<p>In the revised draft, the term “small-scale” is no longer used.</p>
	<p>Seventy-two (72%) of online survey respondents agreed and strongly agreed that agricultural impacts (use of chemicals and impacts on the environment) should be considered when preserving areas for agriculture.</p>	<p>The revised draft emphasizes the protection of agricultural lands and the need to consider downstream impacts in a directive policy:</p> <p>3.5.9 Protection of Agricultural Lands <i>Identify and protect agricultural lands for current and future use consistent with the Agricultural Land Commission Act and its regulations for agricultural land within the Agricultural Land Reserve while considering downstream impacts, wildlife habitat, and adjacent properties.</i></p>
	<p>Participants also noted they are worried about food shortages in the future and would like to protect farming to ensure access to food in the future.</p>	
	<p>There were some participants across all engagement activities said they would like to</p>	<p>The revised draft includes a directive policy that would require efforts to address the economic viability of farms:</p>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	both protect and encourage farming, noting its local economic benefit and its contribution to food security and self-sustainability of the islands.	<p>3.5.13 Economic Viability of Farms <i>Strive to address land uses and activities that support the economic viability of farms without compromising the agricultural capability of agricultural land or adversely impacting the area's unique amenities and environment.</i></p>
Sustainable and resilient communities / housing	Throughout all engagement activities, most participants agreed there is a housing shortage in the Islands Trust Area, and that this is one of their greatest concerns and priorities.	Staff have noted these comments. The revised draft continues to include housing policies.
	Participants stated there is a need for affordable housing for many sectors of the population including seniors and youth, and that there is a lack of affordable rental housing for those who work on the islands, particularly in the tourism or service sectors. Some participants shared they would like to remain on the islands as they age but are concerned about the lack of appropriate housing available to them.	<p>The revised draft continues to have policies relevant to this feedback, including the following directive policy that would support increased housing diversity and affordability:</p> <p>3.4.9 Appropriate Locations for Densification <i>Identify appropriate locations where density increases could support the development of safe, secure, diverse and affordable housing while reducing dependency on private automobile use, and increasing use of trail systems, public transportation, and active transportation, and without adversely impacting the area's unique amenities and environment.</i></p>
	A slight majority of survey respondents (55%) agreed that the Policy Statement should include an Islands Trust commitment to strategic, multijurisdictional, equitable and integrated approaches to diverse housing needs, and that local official community plans should carefully manage the rate and scale of growth and development in the area.	<p>The revised draft has policies relevant to this feedback, including ones directing the management of the rate and scale of growth:</p> <p>3.4.1 Sustainable Development <i>Ensure development is compact, energy-efficient, and appropriately situated on the island and on the site in order to:</i></p> <ul style="list-style-type: none"> • <i>reduce dependency on private automobile use, and support increased use of trail systems, public transportation, and active transportation,</i> • <i>be compatible with preservation and protection of the area's unique amenities and environment, and</i> • <i><u>limit impact on Indigenous cultural heritage, harvesting and hunting areas.</u></i>
	Participants supported the proposed policy that new development should be small-scale, low-impact and energy efficient, tying into earlier feedback that rainwater could be used as a primary source of water for new developments.	<p>3.4.2 Density Limits <i>Establish appropriate density limits for efficient and sustainable use of the land base that help to safeguard protected area networks, and is compatible with preservation and protection of the area's unique amenities and environment.</i></p>
	While there was some concern expressed about	The revised draft continues to have a directive policy about floor area and lot coverage limits:

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	size of homes, a slight majority of respondents (51%) did not support directives to local trust committees and island municipalities on limits of floor area and lot coverages.	<p>3.4.11 Floor Area and Lot Coverage Limits <i>Determine appropriate floor area and lot coverage limits for residential development to minimize greenhouse gas emissions and cumulative impacts to the area’s unique amenities and environment, including impacts on agricultural land.</i></p>
	Participants generally supported short-term rentals (e.g., for the economy and seasonal workers) but are in agreement with ensuring regulations be put in place (e.g., to prevent impacting availability of long-term rentals).	<p>The revised draft continues to have a directive policy about short-term rentals:</p> <p>3.4.10 Short-Term Rentals <i>Identify and assess the impacts of short-term rentals of dwellings on the availability of safe, secure, and affordable housing and, where necessary, regulate and limit the number of short-term rentals accordingly.</i></p>
	A majority of survey respondents (58%) supported Islands Trust advocating for appropriately-situated transportation networks for electric vehicles and electric bikes. Some participants did offer a contrary perspective, raising concern about the long-term environmental impact of the disposal of batteries, the large amount of energy that goes into building vehicles, and lack of connectivity or capacity of the electrical grid in some areas.	<p>The revised draft continues to have a policies related to clean transportation and it expands beyond electric vehicles to support active² transportation, as well as, transportation networks:</p> <p>3.4.13 Public and Active Transportation Networks <i>Identify and establish appropriately situated, safe, comfortable, and equitable transportation networks, both on the islands and to the islands, that reduce dependency on private automobile use, encourage electric vehicles, and support increased use of trail systems, public transportation, and active transportation</i></p> <p>3.4.14 Road Systems</p>
	When asked about advocating to BC Ferries for the electrification of their fleet, feedback was more mixed, with some participants indicating this is outside the Islands Trust mandate and is an issue better left to other levels of government. Others indicated that better ferry service is needed and would like to see Islands Trust work with BC Ferries to ensure safe and efficient travel.	<p><i>Strive to ensure that road location, design, construction, and road systems are compatible with preservation and protection of area’s unique amenities and environment.</i></p>
Engagement process	A common theme across all engagement activities and in response to the online survey questions was a frustration with the engagement process and structure of the survey including:	Staff have noted this feedback and will use it in future process design, including for any future survey design.

² Includes public transportation, and human-powered transportation

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	<ul style="list-style-type: none"> - Designed to elicit desired responses - Too many concepts in a single question - Questions confusing - Character limits <p>Participants shared they would have liked a more thorough and transparent process, and more time to understand the Draft New Policy Statement document and proposed changes. Barriers identified:</p> <ul style="list-style-type: none"> - Residents not receiving mail outs - Not having computer access - Apprehension about attending in-person engagement activities due to the pandemic. - Concern with the approach taken by Islands Trust to hold separate engagement processes (which made it difficult to share perspectives with each other) 	
General policy structure	<p>Need for simpler structure and language in the Policy Statement. Comments on the Policy Statement were that it was vague, confusing, and technical, and that the document contains too many overlapping themes, a lot of repetition, and did not express the concepts well.</p> <p>There was strong support for a Glossary of Key Terms to be added to the Draft New Policy Statement.</p>	<p>As per Resolution 1, which asks for a reformatting to simplify the structure and shorten the length to improve readability, the revised draft has been written to address these comments.</p> <p>Per Resolution 2, which asks for the development of a glossary to be an appendix to the document, a glossary has been included.</p>
Governance	<p>Many participants shared concerns that Islands Trust is expanding its mandate to include climate change, affordable housing, forestry, agriculture, community, and Reconciliation. Many considered these policy mandates to overlap with existing regulations by other levels of government and questioned whether Islands Trust staff has the expertise or capacity to implement the scope of these policy changes.</p>	<p>Trust Council reviewed this feedback before passing the 32 resolutions. The Islands Trust has struck a Governance Committee to review governance matters. (see Governance Committee webpage for more information)</p>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	<p>Many responses from participants indicated that they would like less involvement from Islands Trust in local decision-making, that Islands Trust is becoming too large, or that it shouldn't exist at all. Some expressed concern that the Draft New Policy Statement is an effort of Islands Trust to gain more control and centralize decision-making and governance in the Islands Trust Area.</p> <p>With respect to governance, some participants shared that Islands Trust should include First Nations representatives on Trust Council, and others recognized First Nations' right to self-govern.</p> <p>Some participants were concerned about Islands Trust's financial accountability in terms of policy changes that they perceived would broaden the Islands Trust mandate and thereby increase budgetary needs and impact taxes.</p> <p>Some participants asked that Islands Trust review their governance model before moving forward with updates to the Policy Statement.</p>	
Reconciliation	<p>While most agree with and support Reconciliation work and are happy to see inclusion of Reconciliation policies in the Policy Statement, many participants noted this is a complex topic and that it has overlapping responsibility with other levels of government.</p> <p>Some shared that Islands Trust doesn't have the expertise, funding or jurisdiction to address this, and that many actions are already being taken by senior governments.</p> <p>Participants shared a sentiment that relationships with local bands are better built at the local level.</p> <p>Need for more information about Reconciliation and how it will affect decision-making.</p>	<p>Reconciliation work is ongoing at the Islands Trust. Efforts to build relationships are underway at staff-to-staff and leadership-to-leadership levels. These efforts are uneven across the Islands Trust Area and we recognize we have a long way to go. One of our hopes from these efforts is to listen and learn from Nations regarding what pathways toward implementing the UN Declaration might look like. We want to create these pathways together and recognize this needs to start with relationships (see Islands Trust's webpage on Reconciliation for more information).</p> <p>The revised draft of the Policy Statement has several principles and directive policies that are relevant to this feedback:</p> <p>2.1.1 Acknowledge and Respect Indigenous Rights <i>To grow understanding of the history and legacy of colonialism in the Islands Trust Area, to acknowledge and respect the rights of Indigenous Peoples in decision making, and to work together with Indigenous Governing Bodies and Indigenous Knowledge Holders to preserve and</i></p>

Topic	What We Heard in Phase 3 Engagement	How the Comments Have Been Addressed
	<p>There was a recognized need across all engagement activities for more broad and genuine engagement with First Nations on the Policy Statement, and a concern about how engagement has been handled by Islands Trust to date.</p> <p>Many participants would like to see a definition of terms such as “Indigenous ways of knowing” and want to better understand how this will be used in decision-making.</p>	<p><i>protect culturally significant areas, sites, and species.</i></p> <p>2.2.2 Work Towards Collaborative Governance with Indigenous Governing Bodies <i>To work towards building strong relationships and foundations for collaborative governance with Indigenous Governing Bodies, including through the development of shared decision-making agreements under the Declaration on the Rights of Indigenous Peoples Act.</i></p> <p>2.3.1 Guidance from Truth and Reconciliation Commission <i>To be guided by the 10 principles established by the Truth and Reconciliation Commission of Canada (TRC) (Table 1).</i></p> <p>2.3.2 Guidance from United Nations Declaration on the Rights of Indigenous Peoples <i>To be guided by the principles established in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) including, but not limited to, the following UNDRIP articles (Table 2).</i></p> <p>2.3.3 Guidance from Missing and Murdered Indigenous Women and Girls Calls for Justice <i>To be guided by the principles for change used by the National Inquiry into Missing and Murdered Indigenous Women and Girls (Table 3)</i></p> <p>3.1.1 Cooperate with Indigenous Governing Bodies <i>Engage with Indigenous Governing Bodies on discretionary land use decisions that they deem may have potential significant impacts on their territories and the ecological health of the Salish Sea, and when addressing all Policy Statement directive policies (i.e. those under Part 3’s Objectives 2, 3, 4, and 5)</i></p> <p>The phrase “Indigenous ways of knowing” was removed from the revised draft.</p>