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“Integrated Solutions” And The End Of The Islands Trust

By Frants Attorp

Following is a timeline showing how a plan to transform Salt Spring and undermine the Islands Trust was developed in private meetings on Salt Spring Island, and how the central idea—dubbed “integrated solutions”—has gone through various iterations and now forms the basis of a “targeted” update to Salt Spring’s Official Community Plan. Additionally, the concept became the template for Trust Council’s new interpretation of the Trust mandate, and is currently guiding the rewrite of the Trust Policy Statement which covers all islands in the Trust Area.

The “integrated solutions” theory is based on the idea there is no need for a single priority as various issues or “elements” of importance can be addressed all at once. But making everything a priority is contrary to the Islands Trust Act and to basic principles of conservation which require environmental protection to be the primary focus of long-term planning. The theory denies the reality that development, in its many forms, has a negative impact on ecosystem health, and promotes the fallacy that endless growth is possible and that we can have our cake and eat it too.

1. December 19, 2019 – The Salt Spring Local Trust Committee passes a resolution directing staff to work with one of the trustees “to establish a Salt Spring Housing Working Group to advise the Local Trust Committee” on housing matters.

2. January 2020 – September 2020 – The said trustee meets privately with a group of six activists, almost exclusively from the business community, and most or all members of a lobby group that has expressed objections to the Islands Trust Act. This violates Administrative Bylaw

467 which is designed to ensure a balanced group, open public meetings, and minute-taking, and to prevent trustees from giving advice to themselves.

3. July 20, 2020 – After months of events and feedback from more than a thousand people, the public engagement portion of Trust Council's Islands 2050 project concludes with a "What We Heard" press release stating that "most participants expressed that they value having a connection to nature on the islands and support the Islands Trust preserve and protect mandate." According to the press release, the findings "will help the Islands Trust update the Policy Statement."

4. August 2020 – Salt Spring's unappointed housing group writes a report that shifts the primary, long-term focus of the Trust from environmental protection to "integrated solutions." It claims the goal is "to develop new policies and regulations that will increase the quality and quantity of housing options, coupled with a high level of protection of the island's biodiversity and freshwater, marine, and forest resources." But the dominant long-term objective is clear: "Affordable, appropriate, accessible, and attractive housing should be available for Salt Spring residents of all abilities, incomes, lifestyles, livelihoods, and household types."

Included on the list of "options" is mass upzoning of private land for suites and year-round cottages, land deal incentives, and a recalculation of density so it is based on square footage rather than number of dwellings. The options, if implemented, would violate existing science-based OCP growth limits and leave Salt Spring vulnerable to open-ended development.

5. September 1, 2020 – The group's report, co-authored by the trustee involved, is submitted for consideration by the Local Trust Committee of which the trustee is a part.

6. November 20, 2020 – The Local Trust Committee makes the report a "top priority," thereby abandoning a planned "comprehensive" review of Salt Spring's OCP, and laying the groundwork for an official Housing Action Program Task Force (HAPTF) to help apply the "integrated solutions" idea.

7. January 22, 2021 – A Housing Action Program Project Charter is approved by the Salt Spring LTC (which includes the chair of Trust Council). It sets out actions leading to a major OCP amendment and contains key concepts that will become central to the future of the entire Trust Area:

“The LTC believes the Islands Trust “preserve and protect” mandate, as set out in s.3 of the Islands Trust Act, is interpreted to not only preserve and protect the environment, but to also preserve and protect a socially diverse local population.”

“Good solutions are integrated solutions that will also address other challenges and crises we face on Salt Spring (e.g., forest health and biodiversity, watersheds, changing climate, land use, community spirit, and resilient small business.)”

Despite the repeated use of the word “sustainable,” the document lists “analyses” relating to ecosystems, climate change, sewerage, and transportation as “out of scope”—a shocking insight into the true meaning of “integrated solutions.”

8. March 9, 2021 – At a Trust Council meeting, the said trustee argues to keep the Trust mandate “as broad possible.” From the minutes: “It was moved by Trustee Rogers and seconded by Trustee Patrick, that Trust Council affirm its understanding that the object (and thus the mandate) of the Trust contained in s. 3 of the Islands Trust Act includes the concept of and protection of healthy and inclusive communities including (but not limited to) housing and transportation. Trustee Critchley moved to amend the motion by adding the phrase “subject to the paramount object of preservation and protection of the natural environment”. Chair Luckham ruled the proposed amendment rejects the original motion and was not in order. CARRIED”

9. May 2021 – The Salt Spring LTC appoints an official HAPTF which elects a member of the previous, unappointed lobby group as chair. The HAPTF is instructed “to be guided by the policy intent” of our Official Community Plan and Land Use Bylaw—a restriction they would soon ignore.

10. June 29, 2021 – Acting on a HAPTF recommendation, the Salt Spring LTC passes a standing resolution that would effectively prioritize housing forevermore: “Enforcement activities will be deferred for all existing unlawful dwellings being used for residential purposes until there are safe, secure appropriate housing options that are affordable for all demographics and household types in perpetuity,”

11. July 8, 2021 – Rather than receive first reading by Trust Council, the first draft of the new Trust Policy Statement, prioritizing the environment as per feedback from the Islands 2050 public engagement process, is deferred pending more public engagement. Opposition to the draft comes from the Salt Spring LTC which, nine days earlier, wrote: “We have heard from some members of the public loud and clear that they have deep concerns and do not feel they

were appropriately consulted. At the July 8 Trust Council meeting, to restore faith in the process and in the Islands Trust, your locally elected Salt Spring Trustees will propose that the current process be paused with the receipt of the draft while Trust Council re-evaluates its public consultation plans. We believe an additional phase of consultation should be added to develop a draft Policy Statement that honours Trust Council's Reconciliation Declaration and can be supported by island residents."

12. August 30, 2022 - The HAPTF submits recommendations to the LTC that expand on the "integrated solutions" suggested by the initial, unappointed housing group—in clear violation of their Terms of Reference. The underlying policy changes, such as those affecting growth and sustainability, and enabling mass upzoning of private land with no rent controls, are never presented to the public for discussion and debate. Non-market housing, which is fully supported by Salt Spring's existing OCP, is hardly mentioned.

13. August, 2022 – The LTC, along with the lobby group and the HAPTF, push for upzoning of thousands of lots for accessory dwelling units (Bylaw 530)—a key element of the "integrated solutions" initiative, but with no rent controls, no build-out analysis, and no data on water, infrastructure, servicing and environmental impact. This is presented to the public as "gentle densification" while dissenters are dismissed as "fear mongers."

14. September 26, 2023 – In an in-camera meeting, Trust Council arrives at a new "consensus" interpretation of the Islands Trust mandate: "Trust Council's view is that unique amenities are broad-ranging and may include issues such as, but not limited to, housing, livelihoods, infrastructure and tourism." The new interpretation, based on the "integrated solutions" theory, is contrary to a 1986 interpretation, signed by the Minister and Trust Council, which states that "unique amenities" refers to the natural environment. During a Trust Council meeting on March 14, 2024, the CAO of the day explains how the new interpretation will affect the rewrite of the Trust Policy Statement: "That is the time when you are really going to manifest Trust Council's view of the interpretation of the Act."

15. November 21, 2023 – The LTC writes to Housing Minister Ravi Kahlon "requesting that Salt Spring Island Local Trust Area be included in Bill 44 as if it were a municipality." (Bill 44 allows mass upzoning for suites and Accessory Dwelling Units without a public hearing.) Minister Kahlon rejects the request in a January 8, 2024 letter to the LTC citing concerns about water, waste disposal and "the Trust's special mandate."

16. December 14, 2023 - Bylaw 530 is withdrawn after lawyers say it violates Salt Spring's OCP growth limits, and amid opposition from Tsawout First Nation.

17. 2023 – 2024 - The SSI LTC subsequently tries to advance a slimmed-down version of the bylaw without a public hearing, but it, too, stalls due to First Nations opposition. The LTC then shifts its focus to a “targeted housing update” that imports the HAPTF’s “integrated solutions” recommendations from 2022 into the list of “guiding documents.”

18. May 2, 2024 – Thirty-four former trustees write an open letter of concern regarding Trust Council’s new interpretation of the mandate. They warn that the new interpretation “has the potential of influencing or compromising environmental policies,” and contend “the credibility of the Islands Trust’s promise of a transparent and open public process has been hurt by the manner in which this decision was reached, the lack of a rationale for this decision, and the lack of information provided.”

19. July 31, 2024 – Trust planners admit the OCP/LUB project has a desired (integrated solutions) outcome: “This project aims to update and align the OCP and LUB with the Salt Spring Island Housing Action Planning Task Force recommendations while considering current community needs, environmental sustainability goals, and regulatory requirements.”

20. October 1, 2024 – The Terms of Reference for the “update” project refers to major, long-term changes: “As a substantive update to the Salt Spring OCP and LUB will guide change on the Island for at least a decade....” Despite its potential to transform the whole island, the project is presented as “targeted,” and allows only “targeted community visioning.”

21. October 1, 2024 – According to the Terms of Reference, the scope of the OCP/LUB project is the same as the goal (housing), effectively limiting broader discussion about growth, sustainability and the Islands Trust mandate:

“PROJECT GOALS: The goal of the Salt Spring Island OCP-LUB Update Project is to increase housing options and housing equity on the island in ways that integrate: a) The interests of First Nations with treaty and territorial interests in the Salt Spring Island Local Trust Area; b) Ecosystem integrity and connectivity; and c) Climate change resiliency.”

“PROJECT SCOPE: The scope of the Salt Spring Island OCP-LUB Update Project will be guided by focus on the above-noted goal and consistency with the Islands Trust Policy Statement.”

22. October 1, 2024 – Salt Spring’s OCP/LUB amendment project has implications for the whole Trust Area. According to the project Terms of Reference, the “update” is contingent on changes to the Policy Statement: “The Islands Trust Policy Statement is currently undergoing a major amendment, the results of which will inform the scale of change that a renewed OCP can invite.” This raises a serious timing question: How can island residents respond to proposed changes whose “scale” will not be known until after the public engagement portion of the update is completed?

Note: Implementation of the HAPTF recommendations would involve changes to several parts of the existing Policy Statement, including Directive Policy 5.2.5 requiring LTCs to achieve “efficient use of the land base *without exceeding any density limits defined in their official community plans.*” (These operative words have already been written out of recent drafts.)

23. October 16, 2024 – Just days before the provincial election, Trust Council writes to the Minister of Municipal Affairs asking for “a provincial review of the Trust mandate, governance and structure.” The letter refers to “current-day issues,” raises questions about the interpretation of “unique amenities,” and states that “Trust Council deliberations are persistently troubled by inconclusive debates about the relative importance and prioritization of environmental protection versus the facilitation of flourishing human communities.” It argues that, “if the Islands Trust is to deliver effective solutions to these challenges its enabling legislation requires reexamination and, where necessary, amendment.”

To date, Trust Council has not received a response to their letter, which means the Islands Trust Act and its conservation-oriented mandate stand unchanged. Nor have the residents of Salt Spring been presented with an opportunity to discuss the “integrated solutions” concept, the underlying policy changes associated with its implementation, and the long-term consequences, especially with regard to growth and sustainability. Just as scandalous, is the fact that the entire Islands Trust regulatory apparatus is being hollowed out, mostly in secret and without the consent of Gulf Island residents or the government that created the agency half a century ago.