



Peter Luckham
Chair, Islands Trust
200 – 1627 Fort Street
Victoria, BC V8R 1H8

November 24, 2021

Re: Referral Response to the Islands Trust Draft Policy Statement “Islands 2050”

Dear Chair Luckham,

Thank you for the opportunity to review and respond to the Islands Trust Draft Policy Statement. The Policy Statement is an important, far reaching policy tool with significant implications for all communities within the Islands Trust. Bowen Island Municipality (BIM) recognizes the importance of reviewing and updating the Policy Statement to ensure it more adequately reflects the needs of islanders today.

At a Committee of the Whole on November 2, 2021, BIM staff presented their finding from reviewing the Draft Policy Statement to BIM Council. BIM Council’s feedback was incorporated into this formal referral response letter, which was approved by BIM Council at the Regular Council meeting on November 22, 2021.

The response is broken into two sections, and follows this introductory letter:

1. Section 1 provides general over-arching comments.
2. Section 2 provides specific comments to specific policy statements.

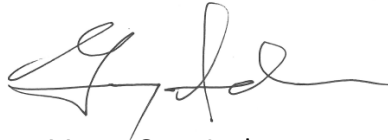
I understand that the timeline for this work has shifted such that it is unclear at this point when the first reading of the Draft Policy Statement might occur. I also understand that as a result of concern over the level of public engagement conducted to date, the Islands Trust has or will be hiring professional services to assist in a more comprehensive public engagement initiative over the coming months. I look forward to learning more about how this engagement process will unfold and how Bowen Island will be involved. I understand that this engagement process, and the shifting timeline will likely result in amendments to the Draft Policy Statement, and I want to be clear that this formal referral response is limited to what is before us at this point in time. It is imperative that BIM is provided ample time to consider further amendments to provide meaningful feedback.

It is important for the Islands Trust to know that both Metro Vancouver and Translink are undergoing similar long-range planning exercises at the same time as this Islands Trust work. While there are synergies and opportunities to ensure alignment through these three important long-range planning initiatives, it needs to be recognized that BIM staff have limited capacity and require sufficient time for thoughtful and meaningful engagement and

responses on all three initiatives. I trust you will take this into consideration when presenting the next iteration of the Draft Policy Statement.

I want to take a moment to thank all the staff and Trustees at the Islands Trust for their efforts on this important project. I look forward to learning more about the next steps and how this response helps shape the future of the Islands Trust's updated Policy Statement.

Kind regards,



Mayor Gary Ander
Bowen Island Municipality

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SECTION 1 – GENERAL COMMENTS

- 1.1 BIM is pleased to see the improved support and recognition of and engagement with First Nations. Respecting that First Nations are best positioned to comment on how they are represented in this document, BIM makes a friendly suggestion that less repetition of First Nation consideration throughout the document, and more prominence at the beginning might be worth considering.
- 1.2 BIM suggests avoiding the use of generic terms and providing a glossary or definitions section for any terms that might need further clarification. Examples include, but are not limited to: small-scale, sustainability, carrying-capacity, etc.
- 1.3 BIM requests a thorough analysis of all the times the word “shall” is used and requests that the Islands Trust provides a table identifying the policy number, policy name, policy summary and specific requirements that “shall” be carried out.
- 1.4 BIM does not wish to see an increase to the Islands Trust tax requisition as a result of a Policy Statement update.

SECTION 2 – SPECIFIC COMMENTS

- 2.1 Housing – BIM has three primary concerns related to the new housing provisions:
 - 2.1.1 Clarification is required on how new housing policies align with the core mandate to preserve and protect the Trust Area and its unique amenities and environment.
 - 2.1.2 BIM recommends reconsideration of including housing policies, or at least recognize that as an Island Municipality, BIM already has sufficient jurisdictional authority in this space and is able to work closely with other housing entities; BIM feels these new policy provisions will result in a duplication of effort.
 - 2.1.3 BIM is concerned that these new policy provisions will result in significant operating cost increase for the Islands Trust and the tax requisition for BIM.
 - 2.1.3.1 No cost implications or analysis has been provided for these, or any policy amendments.
- 2.2 Desalination - BIM suggests the removal of the proposed ban on desalination plants.
 - 2.2.1 BIM Staff have identified that desalination within the context of scarce freshwater resources may be the most ecologically sensitive approach. Climate change impacts may well enhance the need for desalination in the future.

Advances in technology and management practices may mitigate concerns regarding energy demand and ecosystem impacts.

2.3 Docks - BIM recommends the proposed policy banning docks recognizes that Island Municipalities have their own authority and ability to regulate such matters and be exempt from this policy.

2.3.1 BIM currently has dock regulations in place through our Land Use Bylaw.

2.4 *Hard Shores - BIM recommends the proposed policy banning hard shores identify the ability for exemptions and flexibility on this issue.*

2.4.1 Being an island necessitates some shoreline hardening for access and other needs, for example ferry terminals or boat launches.

2.5 Oil Tanker Traffic – BIM recommends the policy banning oil tanker transit through Trust area waters reflect that some transit may continue to be required in the short run.

2.5.1 It is not reasonable to relocate existing fuel depots that require oil tankers to transit Trust area waters (e.g. Cherry Point Fuel Depot on Vancouver Island, or the Port of Vancouver).

2.6 Clear Cutting – BIM recommends considering the use of the term “industrial scale logging” for the proposed policy on banning clear cutting.

2.6.1 BIM is concerned that there may be instances where tree clearing is necessary and thus recommends being more specific about the activities it intends to address.

2.7 Tree Cutting Authority – BIM recommends removal of this policy; or at a minimum that in recognition that Island Municipalities currently have this authority under the Community Charter (Section 8(3)(c), limited by Section 50-52), the policy exempts Island Municipalities.

2.7.1 BIM is concerned about concurrent authority conflicts.

2.8 Wildfire Protection – BIM recommends that any policies on wildfire protection need to consider unique approaches relative to individual biogeoclimatic zones.

2.9 Species at Risk – BIM recommends that policy provisions to support the protection of species at risk is expanded beyond aquatic species to include all biota.

2.10 Microplastics – BIM recommends that policies that aim to reduce and remove microplastics are specifically developed and proposed in the new Policy Statement.

2.11 Section 4.3.7 (previously Section 4.2.7) – BIM recommends the removal of “retain large land holdings” from this policy directive. For ease of reference the policy directive is copied here:

Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, retain large land holdings and parcel sizes to enable sustainable forest harvesting practices and direct the location of roads and utility corridors to minimize the fragmentation of forests.

2.12 Finfish Farms – BIM recommends that the policy be amended to allow for land-based and/or closed containment finfish aquaculture. BIM also recommends further clarity be provided on what the policy position is regarding other aquaculture practices.

2.13 Ferries – BIM recommends that the policy statement be expanded to advocate for both enhanced foot passenger and bike capable ferry services.