

Salt Spring Community Alliance Meeting Notes

Cottages Bylaw 512

March 25, 2019

On Monday evening, March 25, 2019, community members gathered to discuss the Local Trust Committee's proposed Cottages Bylaw 512 as well as the larger issue of affordable/available housing on Salt Spring Island.

These notes will be shared with all relevant decision-makers, in the hopes of influencing upcoming decisions related to this bylaw, and perhaps beyond.

*Before the meeting, participants received a **summary of Bylaw 512**. (See **Appendix 1**)*

*An extensive, content-rich dialogue also took place on **Facebook** prior to the meeting (See **Appendix 2**)*

The community meeting format was a circle process in which everyone had an opportunity to speak their mind in a safe, respectful environment. As one appreciative participant noted at the conclusion of the evening: This meeting format is the true meaning of the Alliance.

The following major themes emerged:

1) Specific Comments about Bylaw 512

General Comments in Support of Bylaw 512:

- Perfect is the enemy of getting anything done. This bylaw - the lowest hanging fruit - is one of many dozen solutions available in our Official Community Plan (OCP). Based upon evidence offered by planners, Trustees are trying their best to address the challenge of supply and demand with this bylaw.
- This bylaw is meant to be a small step to help existing cottages to be year round and legal. It could lead to legalizing cottages throughout Salt Spring. If this bylaw has teeth, some vacation rentals would become illegal.
- This bylaw is only a first step. To continue progress, community members have a responsibility: Planners do better work when people talk to them personally. There is a planner available at the Islands Trust front desk all the time to answer questions and receive feedback. Remember, the OCP is 'us' - It was made by our community.

General Comments in Opposition to Bylaw 512:

- Bylaw 512 is a political minefield, a bad law, and a red herring. Changing the zoning does not mean that new rentals will become available. Already, 70% of the suites on Salt Spring are legal to rent, and there are properties already zoned for affordable housing that are not being developed.

- The exclusion of Agricultural Land Reserve farmworker housing undermines the original purpose of this bylaw.
- The potential implications of this bylaw have not been considered. How would a developer use this bylaw?

Is There Adequate Water?

- How do we know if there is enough groundwater? There is not much data on the adequacy of our water supply, and planners do not really have a strong/clear understanding of how much water we have or where it is located. Can cottages allowed by this bylaw in North Salt Spring Water District use rainwater?
- How does this bylaw affect the Grantville area? Listings in that area advertise homes plus cottages that can be built on 1/4 acre. How can this be legal? Won't septic systems be too close to drinking water wells?
- We need to stand up for conservation and respect our resources. All water we use actually takes away from other users like the orcas, fish, and frogs. When we capture water, it reduces the capacity of the whole system, and that has impacts.
- There are so many people commuting EVERY DAY to Salt Spring to work, because they simply cannot find a place to live here year-round. This is creating a lot of pollution and water/environmental impact that no one is recognizing or admitting.

Cottages are Expensive to Build:

- The cost of building new cottages is too high and can take up to 20,000 hours at \$50 per hour. Once built, they will not necessarily be affordable. Over time, market forces will drive up the cost of a home with a second suite as well as the rental price of the cottage. The imperative to maximize profits over time will undermine the original purpose of this bylaw.

Is There Adequate Enforcement to Ensure Cottages do not Become Vacation Rentals?

- How will this bylaw prevent short term rentals? Will enforcement be done only through courts? Our current enforcement procedures are lax enough to let a lot of people continue to live in illegal rentals. Housing agreements like Bylaw 512 are harder to enforce on such a small scale and would better on a larger scale.

2) Concerns About Affordable/Available Housing in General:

Salt Spring Values:

- Our community is suffering more than most know. We need a cultural shift. What are our values? It's inexcusable that people are living in the woods. Everyone deserves shelter and to feel safe. I see people wanting, not to get rich, but just to have a decent life. Unfortunately, that is hard to come by.
- Many of us worked hard, were lucky, and did well. Many also moved here when it was a cheap place to live. That choice to work and succeed is reduced now. We can't pull up the draw bridge, but we can do better.
- Our economic base has to change. Tourism is damaging. We need balance and diversity to keep our community healthy. We will lose our diversity if we are not more proactive. We need to protect our unique communities, artists, farmers. The market won't look after the poets and dry-wallers. We need proactive action to maintain or build a complete community.

- Is SSI just another resource to plunder? Might we be getting to the limits of what is possible to build on our island? Where do we stop? Maybe we should better utilize what already exists.

Salt Spring Inertia:

- Some expressed discouragement about the rules and inertia making positive change so difficult. Many opportunities are not being utilized. For example, a project rezoned in 1994 is just now being developed for affordable housing. How can our government react more quickly to address climate and housing emergencies? How can we respond to the climate emergency in a way that bridges our differences and makes us more resilient?
- There is some progress: Gas tax funding will soon be allocated to Croftonbrook and other housing projects.

A Bigger Problem than Salt Spring Alone:

- There are serious economic realities that seem beyond our control. Lack of housing is a national problem, and affordability challenges are being experienced on all the Gulf Islands.
- Part of the problem is that Salt Spring is such an attractive place to live. It is likely the best place to live in Canada, and more and more will come.

Possible Solutions:

- Request was made for solutions - not just an expectation that the government will solve all our issues.
- There is a huge crisis here, we can learn from other communities. All other islands have year round cottages, not seasonal ones. Why not be like them? What about tiny houses, eco-villages, wagon wheels? Boarding houses used to be more available and could be again. What about leased land communities? This option has been successful elsewhere
- Rainwater collection is possible, scarcity is a myth. One hundred gallons per family, per day is enough. Let's move forward on rainwater catchment - is it possible to be the only source on a lot? Transition Salt Spring Enterprise Cooperative has loans available for rainwater catchment.
- Let's look at changing our zoning: Our current zoning already allows much water overuse: Zoning considers a 10,000 sq. ft house equal to a 600 sq. ft cottage.
- Let's just use the buildings that already exist. How can we encourage people to share their land and homes and support those that already do? If people's hearts were open, we would not have a housing crisis.

Appendix 1: Summary of Views on Bylaw 512 Distributed BEFORE the Community Meeting

Salt Spring Island Local Trust Committee's Proposed Cottages Bylaw 512

If adopted by Salt Spring's Local Trust Committee (LTC), the proposed *Affordable Rental Housing Cottages* Bylaw 512 would allow full-time occupancy of up to 405 units of rental housing on lots where seasonal-only cottages are currently permitted. These full-time rental cottages would be allowed:

- A floor area up to 56 square meters on lots between 1.2 hectares and 2 hectares, and
- A floor area up to 90 square meters on lots 2 hectares or greater.

Currently, our Official Community Plan (OCP) provides for an estimated 8,150 dwellings when all permitted buildings have been built. This bylaw increases the permitted dwellings by less than 5%. The actual number of new rental cottages that would be created would depend upon the wishes of individual property owners. Some properties already have cottages, and the bylaw would permit them to be legally rented on a full-time basis. On properties without cottages, an owner could choose to do nothing, build a cottage, or allow a full-time renter to provide a dwelling.

Proposed Bylaw 512 includes a covenant that would prevent subdivision of these full-time rental cottages from the parent parcel. It also requires these full-time cottages to be used for rental only. (Cottages already being used lawfully as temporary accommodations - or having been issued a building or development permit to allow such use prior to the adoption of Bylaw 512 - would be exempt from this requirement.)

Timeline: Before bylaws are adopted, provincial law requires consultation, formal notifications, a public hearing, and four readings. The LTC gave Bylaw 512 its First Reading on September 27, 2018. After initial input from a number of local agencies and the public, the LTC made some amendments to the bylaw and gave it Second Reading on February 26, 2019. Public notice must still be published in local media as well as convening a formal Public Hearing (not yet scheduled).

After the Public Hearing, the LTC will decide what happens next – it could give the bylaw its Third Reading as is, it could make minor amendments, or it could withdraw it. If it makes significant amendments to the bylaw, a new Public Hearing must be held. Once a bylaw has had a Third Reading, it is submitted to the Islands Trust Executive Committee for approval. Once that approval is received, the LTC would decide whether to give the bylaw a Fourth (final) Reading to adopt it and make it law.

Some Reasons Folks Like Bylaw 512:

- Legalization of secondary accommodations has been identified as a key mechanism the LTC has to address the challenge of insufficient affordable/available housing.
- Bylaw 512 offers the possibility of an increase in affordable, legal rental housing soon after its passage.

- Bylaw 512 offers one important component of a broad, multi-faceted approach to addressing Salt Spring's affordable/available housing challenges.
- Bylaw 512 is consistent with the Salt Spring OCP by only allowing these cottages in areas that:
 - a) are not in watersheds for drinking water or well capture zones,
 - b) are not in sensitive ecosystems,
 - c) are not in areas that are hazardous for development (e.g. unstable slopes,) and
 - d) are not in automobile-dependent areas.
- As a result of feedback from referral agencies, a number of properties have not been included in Bylaw 512. Specifically, it would:
 - a) include all qualified properties within 1 km from public transit and exclude all properties significantly more than 1 km from public transit.
 - b) exclude all properties serviced by CRD water districts (as requested by those districts),
 - c) exclude all properties in a buffer area around the Cedar Lane Water System to protect limited groundwater (as requested by that district), and
 - d) exclude farmland in the Agricultural Land Reserve, to be addressed in a subsequent bylaw once new regulations from the Agricultural Land Commission have been clarified.

Some Reasons Folks Do Not Like Bylaw 512:

- The limited scope of Bylaw 512 is insufficient to adequately address the need for affordable/available housing on Salt Spring.
- The bylaw is complex and would be simpler if it just converted all seasonal cottages to full-time occupancy.
- There is no evidence that this bylaw will produce a significant increase in the number of affordable housing units. Previously-approved Bylaw 461 that allowed secondary suites on approximately 1,500 properties may not have resulted in a significant increase in the availability of affordable rental housing.
- Property owners should have been more involved earlier in the process. No determination has been made whether these owners have a cottage or are interested in renting their cottage for full-time occupancy.
- By potentially increasing density, this bylaw could endanger the availability of groundwater before we have accurate data about the extent of our groundwater supply.
- If additional cottages are built, they may be illegally used for short-term vacation rental rather than affordable housing.
- Bylaw 512 may not be consistent with the OCP, especially in regard to Salt Spring's rural and agricultural sustainability (A.4.2.2,) limits to growth (A.4.3.3,) and groundwater supply protection (C.3.3.1.1)
- Although First Nations have not offered an opinion on Bylaw 512, they have usually opposed additional development on Salt Spring Island in the past.

For more detailed information, see:

Affordable Rental Housing – Cottages Bylaw 512

<http://www.islandstrust.bc.ca/islands/local-trust-areas/salt-spring/projects-initiatives/affordable-rental-housing-cottages/more-information/>

Islands Trust reports "Housing Strategic Actions" (Page 295 to 357)

http://www.islandstrust.bc.ca/media/347296/tc_2019-03_12-14_adg_pkg_final.pdf?fbclid=IwAR31FVEcxSh7Wj84b_uptg-1bCPcVnHryvnPyLOISERvGwEeN-TTwLgA9HI

Appendix 2: Detailed Facebook Discussion

Before this meeting, a respectful, content-rich conversation took place on the Salt Spring Community Discussion Form Facebook Page between Rhonan Heitzmann and Linda Adams. This exchange offered a rich resource of information, and so portions of this conversation are duplicated below, with permission from the authors:

Rhonan Heitzmann This bylaw misses the opportunity to seize the low hanging fruit that is legalizing long term use of seasonal cottages that are ALREADY BUILT. What the summary linked above does not say is that this bylaw gives permission to some 400 properties out of 1300 currently zoned for "seasonal" cottages. We would be better off removing the seasonal from the definition of cottage in the land use bylaw, thus giving permission to all that are already built.

And also mandate that new cottages in areas with water problems have a sustainable alternative supply. This way we simplify the rules. but create a new strong rule about protecting water supplies where threatened....that can also be applied to other new initiatives like the idea of "home plate" zoning which could work as an eco-village zoning...being given strength by the trust's own recommendation to adopt square foot ratio as a density metric.

I would support this bylaw as better than nothing except for the fact that many would say "look what a great change we made we have given permission to 400 cottages" and then nothing more gets done for another 5 or 10 years....that would be a tragedy. Better to fight now to get amore meaningful change passed and also to have a meaningful discussion about what environmental impacts housing people in secondary dwellings has versus "seasonal" occupation I would argue that the impacts of seasonal use are actually more detrimental than year round use because the vacationers come and such up lots of water in the driest time of the year where as year round residents are more careful with limited resources...and it benefits the community to have year round housing available. The conservationists who oppose any change that might mean an increase in population should consider the impact of hundreds of cars commuting to SSI everyday from Vancouver Island to service the needs of the increasingly wealthy and aging population here. Better to house the people locally even if they might have to drive 10 km to their cottage from town.

Linda Zakrison Adams A few thoughts on this proposed bylaw:

First, I think it's important to remember that any time our Salt Spring LTC wants to amend our local Land Use Bylaw (AKA zoning bylaw), they have to do that in a way that's consistent with our Official Community Plan (OCP). Hundreds of islanders worked on and gave input into our OCP for just that reason – it guides the type of zoning changes that our LTC can make. Of course, our LTC can amend the OCP too, but that's a much longer process, involving mandatory consultation with the community, local agencies, provincial agencies and First Nations. If zoning changes are to be made relatively quickly at this

point, they legally have to comply with the OCP. So any suggestions about amending the current bylaw would definitely need to have the OCP in mind.

And it turns out, our OCP has some pretty specific policies about when the LTC can amend the zoning bylaw to convert 'seasonal' cottages (already allowed on some properties) to affordable rental housing units. Those policies were developed through lots of consultation with Salt Spring Islanders and our local agencies. You can read them for yourself in Section B.2.2.2.16 on Page 26 of the OCP's Volume 1: <http://www.islandstrust.bc.ca/.../volume-1-consolidated...>.

Here's a summary:

Under its section on Affordable, Rental and Special Needs Housing, our OCP says that the LTC should 'consider amending the Land Use Bylaw to allow the use of seasonal cottages as full time affordable rental housing units in certain areas'. So, the OCP gives some general guidance to the LTC – that it should consider making the amendments they are proposing in order provide affordable rental housing.

Next, the OCP has some policies about the sizes of cottages.

Right now, where seasonal cottages are permitted, they are limited to 56 sq m (602 sq ft) in floor area. But to encourage affordable family housing, the OCP says 'the Land Use Bylaw may be amended to permit cottages with a maximum floor area of 90 m² (~969 sq ft) on lots 2 hectares or larger in area, while retaining the existing floor area limits (602 sq ft) on cottages on lots between 1.2 hectares and 2 hectares in area'. So far, the proposed bylaw is consistent with the OCP.

Next, the OCP has a number of criteria about where seasonal cottage could be converted to full time residential occupancy:

1. Our OCP says full time residence of cottages should only be allowed in areas with an adequate supply of potable water. This seems reasonable. There are areas of the island where the addition of new cottages could impact the water supply in existing water systems or private wells. Or where some of our little water districts don't think they can supply water. Based on what I can see of the online info, pretty well all of our water districts have indicated they can't supply water to new residential connections. So the bylaw excludes those areas, as the OCP requires.
2. Our OCP says that full time residence of cottages shouldn't be allowed in community drinking water watersheds - whether those drinking water systems rely on surface water (lakes) or wells. This seems to make sense too. In many parts of the province, drinking water watersheds are often complete NOGO zones – you can barely walk through them, and only if you get a permit first. Here on Salt Spring, our historical development patterns mean that many people live in our drinking water watersheds. But our OCP says we shouldn't be adding NEW development to those areas – due to a range of impacts that occur when properties are developed for residential use.
3. Our OCP says cottages shouldn't be used for full time residence in areas with sensitive ecosystems or in areas that are hazardous for development (e.g. unstable slopes). These areas are mapped in our OCP and it's actually a provincial requirement that new development be directed away from such areas. Not much to argue with here, I don't think.

4. Our OCP says the LTC can also consider limits on the location of cottages to minimize dependency on private automobiles. In addition to this, there are other policies in our OCP that emphasize 'smart growth' principles. These are some important principles we need to consider, if we are going to be a sustainable community, going forward.

As an island, we inherited a pretty 'sprawling' form of development from our earliest settlers. They established a pattern of roads and properties long before there were concerns about the costs of fuel, climate change, or the costs of maintaining such a spread-out pattern of settlement. These days, such concerns are part of the picture. Where a community has a low-density, sprawling form of development, it has to pay a lot of related costs, compared to denser forms of development – to send community services (road maintenance, school buses, fire fighting, policing, water supplies, social services) to the far-flung part of its community. This type of development also generates more greenhouse gasses, compared to denser development. These days, most communities are trying to reverse these trends. Our OCP has such policies too. It suggests that increased density (such as new full-time rental cottages) should mainly be clustered in areas where services already exist, such as near villages or along transit corridors. Over the long term, this would reduce the cost to the community of providing services to the new development.

In addition, studies have shown that housing affordability is closely linked to transportation costs. To be affordable, housing is best situated where there are effective walking or transit links to needed services (e.g. schools, medical care, groceries), without the need for a car.

5. Finally, our OCP says that the LTC should make the transition from seasonal cottages to full-time rental occupancy in a way that is 'incremental' and that it will 'monitor changes in order to have the effect of limiting the overall number of full-time units on the island'. While not all may agree with this policy, it was the result of extensive community consultation that said that significant density increases should only happen gradually.

From what I can see, the proposed bylaw is an attempt to amend 'the Land Use Bylaw to allow the use of seasonal cottages as full time affordable rental housing units in certain areas', as our OCP suggests.

The LTC seems to have paid full attention to the conditions that the OCP places on such amendment, as it is legally required to do, if it wants to move forward with a bylaw amendment. Suggestions that the LTC allow full-time residential use of all seasonal cottages would not comply with our current OCP, so would require a lengthy OCP amendment process. To move forward with minimal delay seems to require a bylaw that is much like the one proposed.

Those suggesting different amendments might want to also show how they have addressed the OCP, as our LTC is required to do. Or they could indicate what types of amendments to the OCP they think should be made, so their proposed amendment would work.

Rhonan Heitzmann Part 1: Thanks Linda Linda Zakrison Adams for clarifying some points and perhaps in light of your comments about the lengthy process of OCP amendments, this bylaw is better than nothing. However it has already taken 2 years to get to this stage. Perhaps smart and strong OCP amendments could actually be made quickly to allow for simple and strong rules. =
Remove "seasonal" from the definition of cottage, (allow the size to be either 600 ft2 footprint with a second story or 900 ft2 footprint rancher). Mandate that all new cottages in a water sensitive area must be supplied by sustainable alternative source of water. (Require metering if necessary) If needed make

community well capture zones and sensitive ecosystems Development Permit Areas, so that any development here is respectful of the ecological concerns.

I believe that these changes will actually better protect the environment and help allow for a sustainable community in the spirit of the OCP than the status quo or the current version of the proposed bylaw. I will explain using your points as reference. Don't forget that the OCP also contains much supportive language to support affordable housing, to retain young families and a sustainable community, and you would know where to find them better than I.

The main concept I would like to challenge is that a "seasonal" dwelling has less impact on the environment than full time use. I feel like this is the underlying misconception that is leading many astray. A Big Red Herring!

First of all, this bylaw propose no new buildings permitted. Some 1300 properties are already permitted to have a building built as a dwelling limited to "seasonal" use. Therefore all of the environmental destruction, development of property, septic, driveways and consumption of resources to build these buildings is already permitted. So how does "seasonal" use protect the environment in light of these development impacts? Not at all. The development impacts are the same.

All 1300 currently permitted cottages are allowed to be used for up to 3 months of the year as vacation "dwellings" which normally corresponds exactly with the time of year when water is scarcest and a concern. But vacationers are much less likely to conserve water than full time residents who are aware of limited resources. I would argue that the net negative impact of water use would be less by full time occupants than seasonal vacationers. (Especially when you consider my proposition of mandated alternative supply) Right now there is zero protection from summer use of water by the already permitted "seasonal" cottages but under my proposition there would be. (And the community gains meaningful year round secondary housing, which allows families' to stay, retired people to move into their cottage and rent out there main house, mortgage helpers so families can more easily afford a home...)

I think some very important distinctions to make are:

Principle Dwelling is not equal to Secondary Dwelling (in terms of impact yet they are counted the same)

Principle use of water is not the same as Secondary use of water. (The principle must include some water for firefighting and irrigation....whereas secondary is only the occupant's indoor use)

Summer Water Consumption is much more impactful than water consumption the rest of the year. (All of our aquifers and lakes replenish each winter, the idea that more annual volume of consumption is more harmful than summer consumption is a Huge Red Herring. It is summer consumption that impacts water scarcity so "seasonal" designation does nothing to protect against the harmful impacts but using an alternative sustainable water supply does.)

Rhonan Heitzmann Part 2 Linda Linda Zakrison Adams quoted OCP points to address:

1. "Our OCP says full time residence of cottages should only be allowed in areas with an adequate supply of potable water." -With a sustainable alternative supply this can be anywhere on SSI, either v...either via Rainwater harvesting where groundwater is a concern and also potentially by a private well where community supplied surface water is a concern. There is also the potential for private desalinization in some areas. These solutions already provide a barrier as there are additional costs associated, but allowing this to be a solution leaves there door open for those who wish to choose these routes, and benefits also the community by promoting the use of rainwater storage which is a key tool for protecting our water resources island wide. The OCP should not be a barrier on this point if alternative sustainable water supply is mandated.

2. "Our OCP says that full time residence of cottages shouldn't be allowed in community drinking water watersheds - whether those drinking water systems rely on surface water (lakes) or wells."

-Ok perhaps this is a barrier in language but not in the spirit of the principle of protecting the environment, and I would submit that the OCP needs amendment on this point on the grounds that year round cottages do not have any more impact on watersheds than already permitted seasonal cottages since the impact of developing the building is exactly the same. Some are concerned about septic, but permitted septic fields are designed for year round use anyway. Additionally the use of composting toilets and reed bed filtrations systems are viable alternatives that should be promoted.

3. Our OCP says cottages shouldn't be used for full time residence in areas with sensitive ecosystems or in areas that are hazardous for development (e.g. unstable slopes).

- Same answer as above...How does full time use change anything compared to already permitted "seasonal" cottages on this point. The destruction by the development of building is the same. We are fools to allow Big Red Herrings such as the notion that "seasonal" use means less development impact, to guide our planning strategy to protect the environment. All of the sensitive ecosystems should be identified and create DPAs to protect them from all kinds of development, not precluding development, simply ensuring development plans of house, cottage, shop, barn, garden or otherwise respect the sensitive ecosystems. As it is now someone can clear a 10 acre lot in a watershed, build a 10,000 ft² house, pave driveways etc, but someone cannot build a modest home with minimal clearing have permaculture gardens, and a full time rental cottage. Which scenario has more impact on the environment? Which scenario is better for our community?

4. "Our OCP says the LTC can also consider limits on the location of cottages to minimize dependency on private automobiles. In addition to this, there are other policies in our OCP that emphasize 'smart growth' principles."

Ok so this is up to the LTC....I am totally in favour of increasing density close to services, roads, transit, potential transit, villages. These are very good points to always consider going forward. But in light of the fact that our housing crisis is so severe this needs a wider perspective. People are already commuting here from Vancouver Island to perform needed services to our community. This phenomenon is not going to magically fix itself overnight, it is going to get increasingly and markedly worse, unless we provide housing locally for young working class families as is also supported and enshrined in our OCP! Anyone who considers themselves an environmentalist, concerned about climate change, cannot seriously deny solutions to house people locally on the grounds that they are too far from services or transit, with the direct result being long round trip commutes in polluting vehicles and ferries....also draining money away from our local economy and permanently upsetting the principle of a sustainable community.

5. "Finally, our OCP says that the LTC should make the transition from seasonal cottages to full-time rental occupancy in a way that is 'incremental' and that it will 'monitor changes in order to have the effect of limiting the overall number of full-time units on the island'"

-In light of our housing crisis as outlined in the point above, this part of the OCP clearly needs amending! In the latest Islands Trust housing needs Assessment (way back in 2015) Over 2/3 of the population earned less than 100,000 per year. Now none of that class can afford to buy a home in today's market and all renters are vulnerable to losing their home. This lack of security is affecting not only low wage earners but also teachers, nurses, policemen, firefighters, home care workers, carpenters, plumbers, business owners, artists, musicians, the elderly....people who have lived here their whole lives.... The current housing situation and permissions is so far behind the need only a radical reset to restore the

balance of planned available housing to meet all the demographic needs of a healthy sustainable community will do. This is especially stark in light of the estimate that up to 60 % of our current rental housing is already non-conforming! We are asleep at the wheel heading for a cliff and the wreckage is going to be any semblance of a sustainable island community as our Islands Trust Policy is also supposed to protect. Young working class families are a species at risk. They are necessary for the health of our community. Do not punt this critical decision to future generations. We are already here, working our butts off to try to stay, and hope that our children might be able to live here as well.

Consider if there are 2500 more Principle residences permitted to be built in our current zoning plan, close to 100% of which will not be occupied by young working class families, elderly, artists etc, then we need to plan for 5000 spaces available to them... either secondary dwellings such as suites or cottages or planned affordable housing units, co-housing etc. Anything less is an utter failure to plan responsibly. This can be done in a way that has way less impact than traditional metrics consider. Secondary dwelling infill impacts the natural environment less than new subdivisions. A "Home Plate" zoning, aka "eco-village" or "square foot ratio" in exchange for conservation and covenant on the majority of parcel is another tool. Meaningful density bonuses exchange for land conservancy under covenant is another useful tool. All of these can benefit from the concept of alternative sustainable water supply where needed as outlined above. All of these are also outlined in the trust councils own "Housing Strategic Actions" (Page 295 to 357) http://www.islandstrust.bc.ca/.../tc_2019-03_12-14_adg...

I call on the LTC to not waste any more time on bylaw 512, instead modify the Land Use bylaw as outlined above, Amend the OCP as needed. The result will actually be much more in line with the overall spirit and vision of the OCP by more strongly protecting the environment and water where threatened while also taking a step towards housing our necessary population. The next step should be to integrate the Trust's own "Housing Strategic Actions" plan into our land use bylaw. It's time for bold and decisive decisions lest our community lay in wreckage of poor planning and the environment suffers the degradation of hundreds of vehicles commuting to serve the wealthy elite, "permitted" population of SSI.

Linda Zakrison Adams Thanks Rhonan. Some good points, but here are some more thoughts.

I wouldn't agree with your suggestion that the LTC abandon the current proposed bylaw and go for a full OCP amendment instead. Here are my reasons:

Once an OCP amendment is engaged, things get a whole lot more complicated and the LTC is no longer in the driver's seat regarding timing.

A big reason for this is that OCP amendments require provincial approval and these days that means, among other things, full and meaningful consultation with First Nations before the provincial approval is received.

This is no small thing and it isn't fast. Whistler famously had their entire new OCP turned down by the courts, on the basis that the province hadn't consulted sufficiently with First Nations before approving it (even though Whistler had done a lot of consultation itself) .

Here on SSI, we have had one OCP amendment that required about 3 years of consultation before FN issues could be resolved. Even then, provincial approval took about another year.

Given that FN generally oppose any bylaw amendments that would increase development and density on SSI, an OCP amendment that does all the things you are suggesting seems destined for delay.

Given those facts, I'd prefer the LTC move forward with a bylaw that doesn't require an OCP amendment, in order to open up some additional potential for affordable housing, rather than taking a route that would inevitably result in further delay.

Rhonan Heitzmann Linda Zakrison Adams good point indeed. I was totally unaware of the time involved.

Perhaps trying to update this bylaw to be the most liberal with the interpretations of the OCP restrictions is the best that can be done right now, perhaps revisiting the legal opinion as to the 5% rule....(as recommended by the advisory committee)I don't know, it's so frustrating that it takes so much time, and it is extremely frustrating to be so hamstrung by language in the OCP that winds up working against itself. I would hope that those who penned those restrictions did not realize the result would be hundreds of commuters ferried over from the big island to serve the elite landowners....

Linda Zakrison Adams Rhonan, again some great ideas! But I think we have to be realistic and base ideas on things that the LTC and our water districts can actually do. Those things are based on the powers they have been given by the provincial government. At this point, I'm not aware that either the LTC or the waterworks districts have the legal ability to 'mandate an alternative water supply' and to enforce it's ongoing use and maintenance.

I think this is where waterworks districts get hung up - if bylaws propose to add new density to their districts.

It's my understanding that when a new building is constructed within a waterworks district, the district has the legal responsibility to supply water, unless they can prove they don't have it. They have no legal mechanism to limit the water that each lot uses (they can't even put in really high rates as a disincentive, as they are only permitted to charge what it costs them to supply water).

So I can understand why our waterworks districts are pretty hesitant about any bylaw that proposed new density within their boundaries - it places a legal burden on them to supply water in perpetuity. And while it may be true that people could ideally get by with less water, the waterworks districts are basing their estimates on the amount of water that people ACTUALLY use. I don't know myself if a seasonal use would use more or less water than a full-time one, but I'm guessing the waterworks districts know and are basing their comments on that.

I agree that it would be great if people would put in rainwater collection systems to reduce their demand on waterworks districts. But again, I don't know of a legal mechanism where either the LTC or a waterworks district can require them to actually use and maintain such a system, as a basis for permitting addition density or occupancy.

So it's not hard to imagine a time when a property owner, faced with the complications and expenses of maintaining/replacing a rainwater catchment system might just decide to go with the easier option of turning on the tap from the waterworks - especially since they would have been paying taxes to the waterworks district all along.

Maybe there is a change in provincial legislation needed to address this. Or perhaps something could be done with covenants or development permits. Until that is addressed and shown to be fail safe, I think waterworks districts (and people who just live in areas with poor groundwater) will continue to feel nervous about increased density and occupancy.

Rhonan Heitzmann Linda Zakrison Adams Interestingly I raised the question about supplying cottages with rain water exclusively at NSSWW strategic plan open house. The answer was they are not opposed to permitting a cottage or tiny home supplied exclusively by rainwater within their district. so long as it was a separate building from one currently hooked up. They also asserted that suites would not be allowed the same permission.

Interesting to me that so much fear and resistance to cottages being used full time centers around water, and treated as "new densities" when all of these cottages are already permitted and can already suck back unlimited amounts of water in the summertime when the resource is scarce. It looks like a shell game. Joke: When is a dwelling not a dwelling? LOL when it's a "seasonal" dwelling....HA ha ha.

Sucking back the water is ok all summer long but dare to use it through the winter when it is pouring rain and the no sayers pile up the barricades. "Let them commute" they say....

I believe we need to stop finding excuses for why innovative things cannot be done, and rather find out how to make it work. Fears around rainwater catchment are unfounded. There are whole communities all over the world who depend on this exclusively. Most people are proud to own them and maintain them very well.

I voted for incorporation so it would be easier to manage things such as monitoring housing agreements, and coordination between planning solutions and water providers. I was told that we can do all of that with our unique government system, but what I observe is continued lack of coordination, conveniently pointing fingers at other agencies for lack of getting things done or taking responsibility. I have been spending a lot of time trying to promote solutions and innovation and contribute as a citizen to our unique system....but I am getting beaten down by the intensity of status quo inertia.

Linda Zakrison Adams Rhonan I'm glad to hear NSSWD was ok with cottages on rainwater systems. Maybe their approach could influence other waterworks districts that seem hesitant. I also doubt the issues have anything to do with incorporated status. They seem to have much more to do with getting close to the limits of traditional water supplies, and therefore not a lot of local experience in how to address it and sometimes a lack of tools to do so. Municipalities aren't in a better place with this. I actually disagree with those who constantly say that incorporation would have been the answer, or our system here is more complicated than elsewhere, as this tends to discourage people from moving forward when that's a Red Herring too. Many municipalities are far worse off than us in terms of affordable housing. For example, we are on par or better than regional averages for things like subsidized housing. On those islands that have never considered incorporating, I see a much more 'can-do' approach, perhaps because no one ever told them that incorporation was necessary to deal with affordable housing (?) - and so they just get on with it!