

**Critique**  
**Salt Spring Solutions: Homes for Islanders:**  
**An Integrated Housing Solutions Framework for SSI 2023**  
**DRAFT May 30, 2024**

## **Executive Summary**

**Introduction:** The Salt Spring Solutions Report attempts to identify the reasons for the current housing crisis on the island. They list what they perceive to be the causes of the problem, including:

- a) Inaction and a lack of coordination between responsible agencies
- b) North Salt Spring Water District (NSSWD) has not found alternatives to the moratorium on new hook-ups instituted in 2014
- c) Our current governance system is dysfunctional: SS Solutions grew out of the failed vote for incorporation, with the implication that there would be better coordination between agencies if SSI was a municipality
- d) Many recommendations of past studies have not been implemented
- e) There is a lack of support for clustered development
- f) Housing shortages exist because the OCP and Land Use Bylaw have not been reviewed.
- g) The responsible agencies have shown a lack of incentives for encouraging housing developments geared towards affordability

**But are these really the problems?** This critique addresses each of the report’s conclusions individually, noting where causes have been misidentified and why. As we shall see, there is a lack of adequate data to back up many of the report’s conclusions.

In many cases it ignores actions that have been successfully undertaken and the lessons learned from those successes—such as the construction of two large affordable housing projects in the past few years; or it fails to acknowledge barriers that are not easily surmountable, such as a lack of funds from senior government, and a lack of adequate community water in the Ganges area.

Nor does the report make suggestions as to how these barriers might be overcome. In particular, the report calls out the North Salt Spring Water District for not making additional water connections available. The authors appear not to have consulted with the District, or they would be better informed of the costs and real physical constraints NSSWD faces in expanding its water supply.

Some of the recommendations they do make, such as “providing incentives,” are simply too general to be useful. If a recommendation is to be effective it must include analysis and detail.

## **Summary of Salt Spring Solutions Recommendations to the Housing Crisis**

Salt Spring Solutions Report makes many recommendations, loosely organized under six categories:

- a) Coordinated and funded local approach
- b) Public Education and Engagement
- c) Clustered Development
- d) More housing in Ganges Village

- e) Additional Dwelling Units (ADUs)
- f) North Salt Spring Waterworks District producing more water

Much of this information duplicates material in the first section of the report, which outlines the challenges to acquiring more affordable housing on the island. Some of the recommendations are certainly good ones, although not all of these would actually have an impact on creating more affordable housing. But both establishing a local housing authority and funding it, and hiring a planner to oversee affordable housing and funding it, would be beneficial. Indeed, steps have been taken already in that direction.

There are several important points to raise about the recommendations in general:

- a) Many are underway or already in place; for instance, CRD regional housing is already able to monitor housing agreements, so there is no need to create a new agency to do that.
- b) Some have already been attempted and met significant obstacles, whether in funding, water availability or local opposition—for instance, the report erroneously blames leaks in NSSWD for water shortages and for not increasing its water supply.
- c) The climate emergency is not given priority; tellingly, the report ties clustered development to water availability without including a proviso for keeping new affordable housing near villages and public transit. We do not want to reinforce our already widely dispersed, car dependent settlement pattern.
- d) Measures for overcoming obstacles often have an element of wish-fulfillment and are not physically or financially practical—expanding sewer systems or finding adequate alternative water sources are good examples. It also suggests defining ADUs as an intensification of an existing water service instead of a new hook-u. Changing the definition will not automatically provide more water.
- e) The report often confuses advocacy with public engagement, and ignores the difference between promoting a project and creating opportunities for two-sided dialogue about it. It is hard not to read the real purpose of this report as an attempt to promote ADUs and clustered housing, since issues around these measures take up the bulk of the recommendations. It consistently ignores valid reasons for questioning if these measures are the best—or only—solutions to the housing crisis.

### **Analysis of SS Solutions Recommendations**

**(Each strategy put forward by SS Solutions is in bold, followed by critique in regular type)**

#### **Strategy 1: Coordinated and funded local approach**

##### **1.1 Establish and resource a local housing entity. 1.2 Expand the scope of the CRD's proposed Rural Housing Program for the Southern Gulf Islands to include SSI.**

More paid persons working on facilitating affordable housing on Salt Spring would probably be helpful. We have heard that a project has been funded and is being planned through CRD for a housing coordinator for the Southern Gulf Islands. As this is an evolving project, the most up to date information should be sought from Gary Holman our CRD Director.

##### **1.2 Develop an implementation-focused SSI housing strategy.**

This should be done after a lead agency has been established so that all stakeholders can be consulted, barriers can be recognized and addressed, where possible.

**1.3 Hire or identify an experienced housing planner to overview housing work and coordinate with the CRD and other partners.**

The Islands Trust has limited ability to support affordable housing. The Trust would be approached when specific actions are needed, such as rezoning for higher density. The appropriate agency to hire a housing coordinator is CRD. A plan to do this with funding from the Southern Gulf Islands Tourism Partnership is now underway.

**Strategy 2: Public Education and Engagement**

**2.1 Educate elected officials and staff on public education and engagement best practices and current methods. 2.2 Develop and resource a Public Education and Engagement Policy.**

The normal Islands Trust public education activities are not a good use of funds. Most engaged community members are well aware of the problem and support construction of affordable housing. The only Trust affordable housing proposal that has encountered serious public opposition is Bylaw 530, and that is because it is so far reaching compared to previous Trust initiatives that legalized suites and cottages.

**Strategy 3: Clustered Development**

**3.1 Create a public education and engagement program about the benefits of compact development.**

The outcome of an engagement program should not be predetermined. A bias in support of compact development is obvious, but neither the type of compact development nor its context is described.

**3.2 Update the OCP and Land Use Bylaw to enable and incentivize more compact, clustered development, increase contiguous land protection in rural areas, and cap detached housing size.**

A distinction needs to be made between clustered housing allowed under existing zoning and expanding zoning to allow many more residences than currently allowed. Expanding zoning means more people who use more water, produce more sewage and use more electricity etc. Many small houses will reduce forest cover much more than one house of the average size on Salt Spring. Increasing land protection would mean controls on development of private properties which is likely politically unacceptable.

Detached housing size on Salt Spring has been capped at 5,000 square feet. CRD Director Gary Holman has reported that CRD data on building permits indicates that 70%-75% of new houses are 2000 sq ft or less. Exact incentives that are needed to reduce housing size should be identified

**3.3 Engage with appropriate partners to establish a coordinated approach for covenants for housing affordability and land protection.**

Lack of coordination is not a barrier to establishing covenants for affordable private rentals. Unlike covenants to protect land from development, that are normally permanent, covenants to guarantee low rents are usually for a limited number of years and therefore do not provide permanent affordability. They may also be unacceptable to landowners. Lack of coordination is not a barrier to

establishing permanent covenants for land protection. In fact, the process is well established and functional.

### **3.4 Create agency capacity to negotiate and administer housing agreements.**

Trust or funders such as CRD, BC Housing, CMHC require housing agreements already, no need for a housing entity to do this. See 3.3 above.

### **3.5 Update priorities and policies for acquiring new local and regional parks to be ready for opportunities that may become available through conservation communities and to clarify how to use or transfer densities from CRD-owned properties.**

There isn't a need to transfer densities for affordable housing since the Trust has demonstrated it will up-zone property for affordable housing. Up-zoning is an easier quicker process than transferring densities. SSI already has a density transfer program. It obviously has barriers since it has almost never been used.

### **3.6 Allocate resources from the Regional Housing Trust Fund (RHTF) to support the development of rural-scale, covenant-restricted affordable housing.**

Several new affordable housing funding programs are being established and available through CRD. Their status would be available from our CRD Director Gary Holman.

### **3.7 Make water supply research and mapping publicly available and provide clear direction on where density can best be accommodated by water resources.**

Existing research and water mapping by the Islands Trust is available on the Islands Trust website. A better recommendation would be to fund the Islands Trust SSI Water Availability mapping project. This recommendation should include trying to keep new affordable housing near villages and public transit. We do not want to reinforce our already widely dispersed, car-dependent settlement pattern. Water should not be the determining factor.

### **3.8 Proactively share research on actual domestic water use and non-revenue water use (system leaks) with the public.**

NSSWD posts the annual data on water supply and use on its website. Some people are under the inaccurate impression that NSSWD has significant water system leaks that if fixed, would provide more supply. This is not the case. NSSWD consistently fixes significant leaks as they are identified. Additionally, the district has a program to replace and maintain its system on a realistic and cost-effective schedule. System leaks are avoided through that process. NSSWD is always trying to identify a cost-effective way to provide additional water for its current users and rate payers. This information could have been determined by consulting with NSSWD before writing the report.

### **3.9 Provide sustained advocate to the province to lower proof-of-water requirements to reflect actual usage and provide support for more housing.**

This recommendation is based on an inaccurate assumption that changing the proof-of water requirements will provide more water for affordable housing from NSSWD. NSSWD's policies are based on its own supply and demand research, not SSI LTC requirements. However, the Trust Water

Specialist has stated that current standards for proof of water for subdivision need to be strengthened to protect nearby groundwater users who should also be protected.

### **3.10 Create agency capacity and external partnerships to participate in design and implementation of home-plate zoning and conservation community regulations.**

The term “home-plate zoning” should be defined, and whether or not this is being applied only to ALR properties or if extending it to acreages in general is intended. The farm home plate is defined as the portion of property where all residential and related buildings, structures and activities are located, leaving the balance of the property for agricultural use.

It is unclear what is meant by “conservation community regulations.”

## **Strategy 4: More Housing in Ganges Village**

### **4.1 Proactively and respectfully engage with local First Nations to explore how to work better together.**

This is already a priority for SSI LTC.

### **4.2 Actively pursue alternatives to the water moratorium for community housing in Ganges Villages and for non-market housing and ADUs district-wide.**

NSSWD’s water supply is limited. Ways to get more water are prohibitively expensive. Nevertheless, NSSWD is searching for ways to obtain more supply. If there are specific suggestions for NSSWD actions, these should be proposed directly to NSSWD.

### **4.3 Allocate resources for better leak monitoring, resolution, and reporting to significantly reduce system leaks and increase public confidence in system management.**

See 3.8 above. NSSWD is well managed and has the confidence of its ratepayers.

### **4.4 Hold a joint public meeting to share the findings of the 2020 Water Service Optimization Study and outline the process ahead.**

NSSWD has decided it does not want to become a CRD entity and give up control over its operations. NSSWD becoming part of CRD will not provide more water. Putting blame on NSSWD is misplaced and detracts from identifying real barriers and solutions.

### **4.5 Coordinate to revise and adopt proof-of-water requirements and system capacity assumptions based on actual use and prioritize water services for compact and non-market housing in and near Ganges Village. & 4.6 Create and implement a regional interagency strategy for sustained advocacy to revise requirements and standards for alternative water supply and conservation practices.**

NSSWD has not based the moratorium or its demand and supply data on these water use requirements. They are irrelevant to NSSWD’s considerations. NSSWD has investigated and determined it cannot discriminate or prioritize among users. It is illegal for it to do so. This is another example of the report writers not consulting with the relevant agency.

**4.7 Prioritize remaining sewer service capacity for non-market housing, ADUs, and multi-unit community housing in and near Ganges Village.**

See above, it is illegal for NSSWD to prioritize among users. Provincial law would have to be changed.

**4.8 Expand the processing capacity of the Ganges Wastewater Treatment Plant and associated infrastructure, and develop infrastructure for repurposing treated grey- water for non-potable uses in Ganges Village.**

Treatment of waste water from the treatment plant has been investigated and found to be prohibitively expensive. However, funding to expand sewage treatment capacity is being investigated.

**4.9 Map and plan for projected sea level rise in Ganges Village and alternative development areas for future village growth.**

Good idea, but it won't necessarily create more affordable housing.

**4.10 Coordinate planning and prioritize infrastructure investments to support residential development in future village growth areas located outside the projected sea-level rise zone.**

The meaning is not clear. Is the suggestion to build more sewage treatment plants in Vesuvius or Fulford or elsewhere? If so, that would be very expensive. More detail is needed here.

**4.11 Catalogue all ALR properties in Ganges Village.**

ALR properties are already identified on the Islands Trust maps that are available on line and in the Trust office.

**4.12 Engage the Agricultural Land Commission in developing an approach for removing all or most ALR in Ganges Village from the reserve.**

It is not clear how this would support affordable housing. A better suggestion would be to replace land removed from the ALR with other agricultural land. There are already several properties close to Ganges that have been rezoned for affordable housing. There may be land that is not in the ALR that would work.

**4.13 Establish a comprehensive and innovative interagency planning process for Ganges Village.**

Ganges is already zoned for housing above stores and more rezoning could easily be gotten. Housing is not being built because of the moratorium on new water connections and lack of funding for construction. Rezoning could be considered as part of the Ganges Planning process that is to begin soon.

**Strategy 5 – Accessory Dwelling Units (ADUs).**

**5.1 Provide public information and education on the impacts and benefits of ADUs.**

ADUs are suites or cottages on existing properties zoned for one residence. The bias of the report's writers is revealed here, since they ignore the negative impacts of island-wide ADUs that could result from zoning changes from bylaws such as Draft Bylaw 530. Providing a venue for direct discussions between the various parties would be useful, but a different format from the typical "public information/Open House" approach is required.

**5.2 Integrate recommendations from the Housing Action Program Task Force in the proposed Bylaw 530 for ADUs or equivalent, and renew effort to permit long-term occupancy of ADUs and tourist accommodations in all residential zones.**

Island-wide unregulated ADUs are opposed by many for a variety of reasons including that they would be ineffective in providing affordable housing and could expand the island's population beyond what is sustainable.

**5.3 Explore creating a density bonus program to conditionally allow through a housing agreement additional ADUs that achieve high ecological or energy standards or that maintain affordability.**

Bonuses are already available. The OCP already supports this and the Trust has done this repeatedly. Applicants have only to apply to the Trust for rezoning for higher density. Barriers should be identified.

**5.4 Update zoning regulations to modernize and limit short-term accommodation uses.**

What specific zoning changes are being suggested? Commercial short-term uses are already prohibited. The problem is enforcement. No suggestion is made on how to improve enforcement.

**5.5 Resource a business licensing system for short-term rentals in line with best practices.**

This suggestion requires more explanation. How would it work? How would it be paid for and why will it better control short-term rentals?

**5.6 Resource internal capacity for managing private housing agreements for ADUs with affordability controls.**

This is already being done by CRD. Their assistance could be expanded to cover more units.

**5.7 Identify funding for capital grants and other incentives for private development of ADUs under housing agreements**

Funding should not go to private parties that are difficult to police. Funding should go to purpose built affordable housing projects.

**5.8 Provide recommendations for where ADUs can be best located based on available water supply information.**

ADUs are not a solution. The private sector cannot be depended on to provide affordable housing. Scientific work should not be done by volunteers, but by or under the supervision of the Islands Trust Freshwater Specialist who is a professional hydrogeologist.

**5.9 Revise policies to define ADUs as an intensification of an existing water service instead of a new hook-up & 5.10 Remove barriers to legalizing ADUs within the NSSWD.**

See previous discussions of NSSWD water supply limits. Changing definitions does not provide more water.

**5.10 Explore innovative policies and practices for encouraging water conservation, developing alternative sources of non-potable water, and restricting treated domestic water for interior uses only.**

NSSWD users are already conserving all summer because their water supply is limited. Alternate sources will be VERY expensive. Who will pay? Suggestions for what NSSWD should do should be based on discussions with them as to what is feasible.

Most properties outside of NSSWD are on private wells or on small water systems that have no excess supply. There is no legal way to control how much water is used from private wells, or to require alternate sources to be used.