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August 20, 2024

File No: 11-5770-30-10

Via e-mail: HOUS.minister@gov.bc.ca

The Honourable Ravi Kahlon
Minister of Housing
Room 248 Parliament Buildings
Victoria, BC V8V1X4

Re: Bill 44 Housing Statutes (Residential Development) Amendment Act, 2023

Dear Minister Kahlon,

Thank you for your response of January 8, 2024 to the Salt Spring Island Local Trust Committee's (LTC) November 2023 request for inclusion in the *Housing Statutes Amendment Act*. While we are disappointed that you were unable to accommodate our request, we value your ministry's consideration of the mandate of the Islands Trust. However, we will point out that only local trust committees, like Salt Spring Island, are exempt from small-scale multi-unit housing requirements. Island municipalities within the Islands Trust, like Bowen Island, are not exempt. We also appreciate your recognition of the distinct housing challenges Salt Spring Island is experiencing, in particular workforce housing.

The LTC's work to introduce additional accessory dwelling units (ADUs) has been significantly delayed as we await further input from First Nations prior to adoption. Our most successful action to date has been deferring enforcement activities on unlawful dwellings, which has facilitated access to irregular or unpermitted housing forms, but also increased risks of putting more people in vulnerable living situations.

There may also be unintended consequences because of the decision to not include Islands Trust local trust areas in Bill 44. Islands like Salt Spring are becoming the last strongholds for the single-family home. This may only exasperate housing unaffordability.

Even though we are frustrated with our limited progress to address the housing crisis, we are pleased to share that we are in the early stages of a targeted update to Salt Spring Island's Official Community Plan and Land Use Bylaw with a goal to increase housing options and housing equity on the island in ways that integrate:

- The interests of Indigenous Governing Bodies with treaty and territorial interests in the Salt Spring Island Local Trust Area;
- Ecosystem integrity and connectivity; and
- Climate change resiliency

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This ongoing project includes infrastructure assessments, equitable public engagement, and meaningful engagement with First Nations, to ensure that policy development aligns with our commitment to sustainable growth and environmental stewardship.

We are grateful for investments that the Province has made in housing issues on Salt Spring Island in recent years. These have included funding support through BC Housing for affordable housing projects, a large grant to undertake a complete community assessment, and financial assistance for our organization's efforts to engage Indigenous Governing Bodies. Most recently, the Province provided \$10 million to the North Salt Spring Island Waterworks District (NSSWD), a critical provider of potable water to our largest village. However, the NSSWD moratorium on new connections continues to require that multi-family housing projects secure their potable water from groundwater wells, which places barriers to entry and introduces risk in managing such projects.

More resources are needed to help the Salt Spring Island Local Trust Committee and other local government agencies on the island address its workforce housing crisis. These include:

- BC Housing support to develop complete affordable housing projects on land already zoned for that purpose
- Tri-lateral engagement with leadership of Salt Spring Island Local Trust Committee, the Province and Indigenous Governing Bodies to better understand how to meet the housing needs of community members in ways that respect the interests of area First Nations
- Funding to undertake cumulative impact and growth-limit type assessments (e.g. groundwater availability) to understand the island's resource availability
- Inclusion of a low-density rural framework in BC Housing and Canada Mortgage and Housing capital funding programs in recognition of the unique characteristics of affordable housing development in rural communities
- Supporting the establishment of a provincial "housing navigator" service to help local non-profit organizations manage the complex multi-jurisdictional approvals landscape in the Gulf Islands
- Access to the short term rental data sharing system
- Re-consideration of including Salt Spring Island in the speculation and vacancy tax boundary
- Creating a rural housing stream and supports to facilitate construction of projects suited to the unique constraints of rural housing

Without additional support from the Province and BC Housing, Salt Spring Island does not have the necessary resources and tools to address this crisis. We urgently ask that your office consider these factors and identify ways to support the Salt Spring Island Local Trust Committee commensurate with the intended policy outcomes of Bill 44.

We look forward to improved collaboration with the Ministry of Housing to ensure that our housing initiatives are aligned with provincial goals while respecting Salt Spring Island's distinct ecological and cultural context. Your support in this endeavor will be instrumental as we strive to create a sustainable and inclusive community for all residents.

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Thank you for your time and consideration.

Yours sincerely,



Timothy Peterson
Chair, Salt Spring Island Local Trust Committee
Islands Trust

Cc: Salt Spring Island Local Trust Committee
Gary Holman, Electoral Area Director, Capital Regional District
North Salt Spring Island Waterworks District Board
Vancouver Island Region Office, BC Housing
Islands Trust Executive Committee
Islands Trust website