

From: SSIInfo
Sent: Wednesday, December 22, 2021 10:10 AM
To: Islands2050
Subject: FW: Letter from Gulf Islands Alliance to SSI LTC
Attachments: GIA deleg Dec 2021.docx; ATT00001.txt

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Purple Category

Good morning,

Please see the attached correspondence from the Gulf Islands Alliance regarding draft Bylaw No. 183 Trust Policy Statement and affordable housing.

Cheers,
Jenn Baddeley (she/her/hers)
Office Administrative Assistant
Islands Trust | T: 250-538-5609

-----Original Message-----

From: Susan Yates [REDACTED]
Sent: Monday, December 20, 2021 11:13 PM
To: SSIInfo <ssiinfo@islandstrust.bc.ca>
Subject: Re: Letter from Gulf Islands Alliance to SSI LTC

Thank you Jenn,

I will attach it here, and thank you for following up on this! It should probably go to Deb Morrisson of the TPC for Islands 2050, as well as the EC in case they want to acknowledge it as a TC Delegation.

Much appreciated,
Susan Yates, on behalf of the Gulf Islands Alliance

November 9, 2021

To: Islands Trust Council
From: Gulf Islands Alliance

Re: **Draft Bylaw No. 183 Trust Policy Statement** and Affordable Housing

Dear Trustees,

Please accept these comments on behalf of the Gulf Islands Alliance (GIA) on the Islands Trust Policy Statement Draft Bylaw No. 183, specifically on the issue of affordable housing.

GIA submits that the inclusion of Affordable Housing should be removed from these 3 high level sections of the Trust Policy Statement: Present Context 1.3; Islands Trust Object and Meaning 1.4; and Affordable Housing Part 6.

We have two reasons why we believe Affordable Housing should be removed from the above-mentioned 3 areas:

First, affordable housing is outside the legislated object of the Islands Trust, thus making directive policies particularly challenging to formulate and implement. If there cannot be strong directive policies, the purpose of including affordable housing raises undue expectations.

Second, deep and abiding solutions to the affordable housing crisis fall within the authority of the provincial and federal government, and the Trust's best position to support this is with advocacy.

The affordable housing crisis is currently being approached from the supply side: provide more housing stock and the problem will be solved. Yet, over several decades now, the supply of affordable housing remains woefully inadequate in all areas of BC, let alone the Trust Area, while housing and land prices continue to rise dramatically.

The demand-side factors that boost housing prices, keep land prices high and make affordable rental and home ownership impossible for so many people include:

- low interest rates that have enabled borrowers to take on bigger mortgages;
- commodification or housing bought as investment properties;
- preferential taxation of principal residences offered to owners of more than one home;
- low and declining property taxes as a share of assessed value;
- allowing short term vacation rentals where long term rentals should be supported

It is only the provincial and federal levels of government that can seriously address most of these forces particularly the commodification and treatment of housing primarily as an investment.

There is virtually nothing in the Directive Policies for LTCs and Island Municipalities to support locally-appropriate implementation to create or provide Affordable Housing. The three directive policies state:

- Identifying appropriate locations where density increases could support safe, secure, and affordable housing (6.2.4)

- Assessing the impacts of short term rentals and regulate and limiting the number of short-term rentals (6.2.5)
- Identifying appropriate floor area and lot coverage limits for residential development in planning areas (6.2.6)

How can these policies create affordable housing stock in the numbers most island communities need?

Local Trust Committees can identify locations for density increases but that doesn't translate into affordable housing unless an applicant comes forward with an Affordable Housing proposal. These few and far-between applications cannot come close to meeting affordable housing demands.

Identifying appropriate floor area and lot coverage for residential development is definitely beneficial for minimizing ghg emissions, reducing natural habitat loss, and maintaining local character, but they do not translate into an increased stock of affordable and available housing.

The Directives that could have the most impact are the advocacy statements in Sections 6.2.3, 6.2.7, and 6.2.8. These are comprehensive statements and include strong language for environmental protection of the Trust Area, but they focus on advocacy, a good intent, but not something that actually guarantees affordable housing.

As citizens in the Trust Area, all of us can demand that the provincial and federal governments address and remediate the demand side problems of the housing crisis, including strategies to:

- create and purchase more public land,
- stop loans to private developers,
- provide grants to non-profit sectors,
- subsidize affordable homes,
- peg affordable housing to average wages,
- commit to purpose-built, eco-designed public and social housing,
- intervene in the commodification of housing by corporate landlords.

In the Trust Area we are all now aware of the impacts of short term vacation rentals (STVRs) on the supply of long term affordable housing. It hurts. Regulating and limiting the number of short-term rentals helps to ensure the integrity of island neighbourhoods, but we know that even strong regulations to limit STVRs do not necessarily provide conditions for long term rentals.

The conversion to luxury vacation rentals of homes that in former years would have been available for long term rent is alarming. It is distressing to see large homes (not the small cabins of yesteryear) remaining vacant for most of the year. For those of us who live in the Trust Area, it is disheartening to see advertisements for 'luxury vacation rentals' in neighbourhoods where we don't just take, we also contribute, with a sense of responsibility to our community.

GIA would like to see the Policy Statement address the issue of STVRs so that support is there for the work of Local Trust Committees to strengthen their OCPs and LUBs in ways that discourage STVRs and encourage long term housing rentals,

Given that the housing market has been hijacked by global capital and the insatiable appetite of the global market, and recognizing that the Trust's jurisdictional mandate for affordable housing is very limited, GIA suggests these changes to the following sections of the Trust Policy Statement:

1.3 Present Context

Remove the entire paragraph that begins “*Many islands in the Trust Area are also facing a lack of safe, secure and affordable housing....while respecting the natural limitations and adaptive capacities of island ecosystems*”. This is information we are all aware of that does not fit with a Policy Directive.

1.4 Islands Trust Object and Meaning

Some of the revisions in this section weaken and scatter the critical focus on the special and unique purpose of the Islands Trust Object and its Meaning, and the necessary clarity of purpose is lost. GIA believes that the historical significance of the Trust Object to “preserve and protect” must remain the primary focus in the Trust Policy Statement. Protection of the natural environment was the reason for the original 1974 legislation, as a measure for dealing with the alarming fragmentation and destructive human development of the Gulf Islands.

Part 6: Sustainable and Resilient Communities in the Trust Area

Context: “Affordable Housing”. This paragraph is cumbersome and feels patronizing. There is no doubt that diverse and secure housing contributes to a sustainable community anywhere in the world. A simple, direct statement to this effect within the context of “Sustainability and Resilience” is sufficient.

Council members, we trust that you will attend to the concerns in this submission. We will continue to review and comment on the Trust Policy Statement as it progresses through to final adoption.

The Gulf Islands Alliance is a non-profit grassroots organization dedicated to the protection of the natural environment and habitats of the Trust Area. GIA supports the Islands Trust federation in achieving its legislated Object. We sometimes also submit constructive criticism with the intent of strengthening the work of Trust Council.

With sincere appreciation,

Susan Yates and Deborah Ferens,
on behalf of the Gulf Islands Alliance