



File No.: 6500-20
Salt Spring Island OCP-LUB
Update Project

DATE OF MEETING: May 16, 2024
TO: Salt Spring Island Local Trust Committee
FROM: Jason Youmans, Island Planner
Salt Spring Island Team
COPY: Chris Hutton, Regional Planning Manager
SUBJECT: OCP-LUB Update Project

RECOMMENDATION

1. That the Salt Spring Island Local Trust Committee endorse the OCP-LUB Update Project Advisory Planning Commission Terms of Reference attached as Appendix 1.
2. That the Salt Spring Island Local Trust Committee endorse the Complete Communities Assessment Community Engagement and Communications Plan attached as Appendix 2.

REPORT SUMMARY

This staff report provides the Salt Spring Island Local Trust Committee (SS LTC) with two project management documents that advance the SS LTC’s OCP-LUB Update Project and the Complete Communities Assessment that will help inform it.

It provides an updated Terms of Reference for a special OCP Advisory Planning Commission and a Community Engagement and Communications plan for the Complete Communities Assessment.

BACKGROUND

At its meeting of April 11, 2024, the SS LTC reviewed and discussed a draft terms of reference for the OCP-LUB Update Project and a draft Community Engagement and Communications Strategy. SS LTC passed the following resolutions at that meeting:

SS-2024-038

It was MOVED and SECONDED,

That the Salt Spring Island Local Trust Committee amend the Salt Spring Island OCP-LUB Update Project Terms of Reference as follows:

- Section D. Use Islands Trust Housing Project Toolkit - Add “The data and mapping inputs into the Suitable Land Analysis will be customized to Salt Spring Island and developed in a transparent and engaged manor.” following “In particular, this project will use the Suitable Land Analysis that has been developed as part of the Toolkit to identify areas of the island that are more, or less, suitable for residential development.”;
- Project Communications Section - Add “the project goals, to the first sub bullet so that it reads “the project goals, boundaries or scope...”;

- Community Engagement Section last sentence replace “Engagement with First Nations and Indigenous Island residents will be considered in a separate First Nations engagement approach.” with “Engagement with First Nations and Indigenous Island residents will be considered in a separate but linked First Nations engagement approach.”;
- Subject-Area Consultant-Led Working Groups - add “short term rentals working group” and “other working groups, as needed”.

CARRIED

Trustee Harris OPPOSED

SS-2024-039

It was MOVED and SECONDED,

That the Salt Spring Island Local Trust Committee amend the Salt Spring Island OCP-LUB Update Draft Community Engagement and Communications Strategy as follows: Section 7 Key Messages – Add a key message that the LTC is seeking to better represent the true makeup of the island.

CARRIED

Trustee Harris OPPOSED

SS-2024-041

It was MOVED and SECONDED,

That the Salt Spring Island Local Trust Committee request staff to provide options for Chair position, composition and qualifications for the OCP-LUB Update Project Advisory Planning Commission.

CARRIED

Trustee Harris OPPOSED

Other resolutions passed at the April 11 meeting included:

- Endorsement of the project Terms of Reference, as amended
- Endorsement of the project Community Engagement and Communications Strategy, as amended
- Direction to begin preliminary outreach to First Nations with treaty and territorial interests on Salt Spring Island

Staff have updated the project Terms of Reference and Community Engagement and Communications Strategy in accordance with SS LTC’s direction above. They are available for SS LTC and the public on the project website [here](#) and [here](#) respectively.

SS LTC also passed the following resolutions at its March 7 regular meeting, which staff have not yet completed.

SS-2024-020

It was MOVED and SECONDED,

That the Salt Spring Island Local Trust Committee direct staff to provide a draft Project Charter based on the discussions on the Terms of Reference in Appendix 1.

CARRIED

Trustee Harris Opposed

SS-2024-021

It was MOVED and SECONDED,

That the Salt Spring Island Trust Committee direct staff to provide a draft scope of services for review and comment for a planning consultant to undertake the work specified in the Terms of Reference in Appendix 1 as discussed and the OCP-LUB Update Project Business Case.

CARRIED

Trustee Harris Opposed

ANALYSIS

OCP-LUB UPDATE PROJECT

Special Advisory Planning Commission

At its March 7 regular meeting SS LTC resolved to create a special advisory planning commission to advise the LTC on matters concerning its OCP-LUB update project.

At its April 11 meeting SS LTC directed staff to “provide options for Chair position, composition and qualifications” related to the special APC.

Options in response to LTC’s direction depend largely on [Spring Island Local Trust Committee Bylaw No. 467](#), which establishes the island’s advisory planning commissions and sets out the terms of their structure and operation. SS LTC cannot depart from matters specifically prescribed in the bylaw, except by way of bylaw amendment. Matters not captured in the bylaw can be addressed in the body’s terms of reference.

Chair Position

Section 2.10 of Bylaw No. 467 states:

“A Commission must, from amongst its members, elect a Chairperson on an annual basis.”

Thus, staff’s previous suggestion in the April 11 staff report that SS LTC appoint a chair of its choosing is incorrect. Bylaw No. 467 enshrines the manner of chair appointments unless changed by bylaw amendment.

A trustee inquired at the April 11 LTC meeting whether a planning consultant could serve as chair of the special APC. Staff review of Bylaw No. 467 suggests that they could not, as Section 2.6 states:

“A Local Trustee, regional district director, officer or employee of the Islands Trust, or an approving officer is not eligible to be a member of any APC.”

Composition and Qualifications

Section 2.5 of the Bylaw No. 467 states:

“Special Projects Advisory Planning Commission(s) will be appointed based on a Terms of Reference endorsed by the Local Trust Committee which will outline the number of members, the terms of the appointment and the scope and role of that Special Projects Advisory Planning Commission.”

Thus the composition of the special APC is a matter that can be established in the commission’s terms of reference. The qualifications that SS LTC may wish to consider depends on what it deems important. A short survey of recent OCP APCs across the province reveals a spectrum of approaches. As these bodies are politically

appointed, trustees can appoint commissioners whose values generally align with those of the LTC, or aim for a broader spectrum of opinion.

Nelson	Courtenay	Fernie
Environmental Stewardship Business Community Economic Development/Tourism Health and Social Services Arts, Culture and Heritage Recreation and Trails Climate and Energy Community Member Housing Education Indigenous Communities Infrastructure, construction, or technology	Environmental Stewardship Organizations Development Industry Business Community Economic Development Health and Social Services Arts and Culture Youth and/or young adult representation	Resources Education Arts and culture Business, Environmental stewardship Health and social services Land development Second Home Owners Tourism and recreation and Members of the community at large representing youth, seniors and families
Elkford	Central Saanich	Cadboro Bay
One member under the age of 18 One member over the age of 65	Members of the general public having an interest in the future of Central Saanich, who may or may not identify as having a specific area of expertise or interest	An awareness of the broader policy context of the project and its implications on land use; Familiarity with local area land use issues and multiple stakeholder perspectives; Communication and public networking skills; and, Teamwork and problem-solving skills

Staff recommend that SS LTC seek to appoint commission members that are generally supportive of the project’s identified goals. The draft terms of reference attached as Appendix 1 assumes that applicants should possess some knowledge about, or support for, the themes of the project. However, SS LTC may amend this in accordance with its interests, in consideration of the options presented above, or based on some other consideration, such as geographic representation.

APC Referrals

The draft APC terms of reference reviewed by SS LTC at its April 11 meeting suggested that staff be authorized to refer documents directly to the APC, rather than wait for an LTC resolution to do so. While this enables quicker review without having to bring matters for LTC referral, staff have subsequently determined that in the interest of good process it is better that referral to the APC be exclusively at LTC’s direction, as the alternative risks putting documents into the public realm that the LTC may not otherwise support.

Nonetheless, Islands Trust Director of Legislative Services has indicated that if SS LTC wants staff to bring matters directly to its special APC, that it should pass a standing resolution that directs such.

First Nations Engagement

Staff continue to work with Indigenous engagement consultant Sue Hallatt to refine a First Nations and Indigenous Peoples engagement approach for this project.

Staff have not yet begun outreach to Nations or Indigenous residents of Salt Spring Island.

Project Identity and Branding

Staff have entered into a small contract with a graphic designer with whom Islands Trust frequently works to develop a project logo and brand identity.

COMPLETE COMMUNITIES ASSESSMENT

The contract to undertake the Complete Communities Assessment on Salt Spring Island has been awarded to Qatalyst Research, supported by the VGEO geospatial analytics firm.

Since the contract was finalized on April 15, the following actions have taken place:

- Consultant visited Salt Spring to tour the island and meet with project team, trustees, and other key interest holders
- Consultant has created a community engagement and communications plan attached to this staff report for LTC review
- Staff have worked to enable VGEO's access to all Islands Trust-held geospatial data
- Staff have worked with other agencies to enable VGEO's access to their data

Community engagement and consultation related to the Complete Communities Assessment will occur generally in accordance with the engagement strategy attached as Appendix 2.

Rationale for Recommendation

- 1. That the Salt Spring Island Local Trust Committee endorse the OCP-LUB Update Project Advisory Planning Commission Terms of Reference attached as Appendix 1.**

Staff Comment: Endorsing a terms of reference for the project APC will enable staff to begin recruiting for the body.

The terms of reference can be further amended as the project advances, if that is a concern of the LTC.

- 2. That the Salt Spring Island Local Trust Committee endorse the Complete Communities Assessment Community Engagement and Communications Plan attached as Appendix 2.**

Staff Comment: Endorsing the community engagement and communications plan for the Complete Communities Assessment means that the project will proceed in accordance with approach set forth in the document.

ALTERNATIVES

1. Propose Amendments

SS LTC may propose any amendments to either the OCP-LUB Update Project APC Terms of Reference, or the Complete Communities Assessment Community Engagement and Communications Plan that it deems appropriate. If it wishes to do so, recommended wording for the resolution is as follows:

That the Salt Spring Island Local Trust Committee direct staff to amend the OCP-LUB Update Project Terms of Reference as follows . . .

That the Salt Spring Island Local Trust Committee direct staff to amend the Complete Communities Assessment Community Engagement and Communications Plan as follows . . .

SS LTC would then endorse the documents as amended.

NEXT STEPS

OCP-LUB Update Project

Next steps for staff to advance the OCP-LUB Update Project are as follows:

- Staff will report back to SS LTC with:
 - A scope of services for a project consultant to support community engagement
 - Options for project logo and brand identify
 - A First Nations engagement approach
- Staff will begin preliminary outreach with First Nations

Complete Communities Assessment

Next steps for staff to advance the Complete Communities Assessment are as follows:

- Project consultant, with staff support, will organize an indicators workshop with local community groups
- Staff will create a detailed project webpage
- Staff will continue to work with agencies to ensure access to required data

Submitted By:	Jason Youmans, Island Planner	May 8, 2024
Concurrence:	Chris Hutton, Regional Planning Manager	May 8, 2024

ATTACHMENTS

1. OCP-LUB Update Project APC Terms of Reference - Draft
2. Complete Communities Assessment Community Engagement and Communications Plan – Draft



**OCP-LUB Advisory Planning Commission
Terms of Reference
May 2024**

Salt Spring Island Local Trust Committee Bylaw No. 467 permits the appointment of an Advisory Planning Commission and an Agricultural Advisory Planning Commission, as well as one or more special project Advisory Planning Commissions, to advise on matters of land use, community planning, or proposed bylaws and permits, pursuant to the *Local Government Act* referred to it by the Local Trust Committee (SS LTC).

This Terms of Reference guides the purpose and roles of a special OCP-LUB Update Advisory Planning Commission and its Commissioners to advise the LTC on matters related to the “OCP-LUB Update Project.” The roles, responsibilities and procedures of the OCP-LUB APC are pursuant to Salt Spring Island Local Trust Committee [Bylaw No. 467](#) and should be referred to separately, except where this Terms of Reference specifies otherwise.

1. Purpose

The OCP-LUB APC will:

- 1.1 On matters referred to it by the SS LTC, review and provide general guidance on community engagement plans, community engagement materials, background information, draft materials, draft vision statement, and draft plan sections;
- 1.2 Assist the LTC with the implementation of the Community Engagement and Communications Strategy and informing the topic priorities and schedule of engagement, consistent with the OCP-LUB Update Project Terms of Reference and Project Charter;
- 1.3 Assist in identifying and connecting the Project Team with key interest holder groups through personal and/or professional contact networks as requested;
- 1.4 Assist in informing the community about the OCP-LUB review process and encourage participation by diverse members of the community;
- 1.5 Act in a strictly advisory role. The SS LTC may consider the advice and recommendations of the OCP-LUB APC, but is in no way bound by such recommendations;
- 1.6 Report to and communicate to the SS LTC through the APC chair.

2. Membership, Composition and Qualification

- 2.1 The OCP-LUB APC shall consist of not more than seven (7) members.
- 2.2 The OCP-LUB APC shall be comprised of individuals that demonstrate an understanding of one or more of the project themes:
 - Housing Equity and Housing Options
 - Indigenous Reconciliation

- Ecosystem Integrity and Connectivity
- Climate Change Resiliency

2.3 Interested parties shall apply for membership to the Commission by means of the prescribed form;

2.4 Commission membership is open to individuals who are members of existing commissions of the SS LTC provided that not more than two (2) members from any specific commission are appointed;

3. Appointment and Term

3.1 Members shall be appointed until project close;

4. Remuneration and Expenses

4.1 Members of the Commission shall serve without remuneration, except for pre-approved expenses that arise directly out of the performance of their duties and that shall be reimbursed in accordance with applicable Islands Trust bylaws and policies.

5. Procedures and Conduct

5.1 The Commission is appointed by, and reports to, the SS LTC. The SS LTC reserves the right to amend the structure of the Commission at any time including the appointment of new members or the termination of the Commission;

5.2 Members have a responsibility to make recommendations based on the object of the Islands Trust and interests of the community. In providing its advice and opinion to the SS LTC, the Commission shall have due regard for applicable bylaws and policies of the Salt Spring Island Local Trust Committee and Islands Trust;

5.3 Members shall conduct themselves in accordance with Robert's Rules of Order which shall govern the conduct of meetings, Islands Trust Meeting Procedures Bylaw [529](#); and the *Community Charter*;

5.4 Only the Chair may speak on behalf of the Commission. Commissioners may not represent themselves as having any authority beyond that delegated by the SS LTC;

5.5 The OCP-LUB APC is not authorized to call public meetings, commit funds, enter into contracts or represent the SS LTC;

5.6 A respectful and cooperative decorum will be maintained at all times between Commission members, Staff and Consultants;

6. Chairperson

6.1 The Chair shall be a voting member of the Commission

7. Meeting Frequency

- 7.1 The Commission shall meet only when matters are referred by the SS LTC;
- 7.2 Meetings will occur on an as-needed basis in support of key Project milestones, to be scheduled by the SS LTC. Approximately 12 meetings are anticipated to be required within the project timeline;
- 7.3 At the first meeting of the Commission, members will determine whether in-person or online meetings are preferred. Hybrid meetings will not be permitted.

8. Commission Recommendations

- 8.1 Recommendations and minutes of the Commission will be presented by the Chair at a regular SS LTC meeting;

9. Staff Support and Other Resources

- 9.1 SS LTC will provide Staff to prepare and distribute meeting agendas and minutes, distribution of materials for review and assist in facilitating discussions;
- 9.2 At the direction of the Project Manager, professional and technical advice may be provided by the appropriate Islands Trust staff person, the Consultant contracted to undertake the project or professional expert to explain or clarify the legislative and technical contexts which affects the review and the implications of recommendations proposed by the Commission;
- 9.3 Additional support and resources may be provided at the discretion of the SS LTC.

Introduction and Background

SS LTC has been awarded a grant administered by the Union of British Columbia Municipalities (UBCM) to undertake a [Complete Communities Assessment](#) for Salt Spring Island. The Government of British Columbia's [Complete Communities guide](#) lays out the prescribed methodology that local governments should follow to undertake a geospatial analysis across four required themes:

- Housing
- Transportation
- Daily needs; and
- Infrastructure

According to the Complete Communities guide, the goal of the complete communities concept is to foster communities that “provide a diversity of housing to meet identified community needs and accommodate people at all stages of life, and provide a wider range of employment opportunities, amenities, and services within a 15-20 minute walk.”

On Salt Spring Island, the results of the Complete Communities Assessment will provide a fact-based foundation to inform subsequent discussions about community development options and appropriate policy responses. Information derived from the Complete Communities Assessment process will provide data and context to inform an upcoming major OCP-LUB Update Project.

SS LTC has signalled that the province's concept of a complete community is not appropriate for a rural island context like Salt Spring Island. Therefore, it will be important to hear from residents during Phase 2 of the project as alternative scenarios for community change begin to emerge.

Approach, Methods, and Tools

A variety of methods and tools will be used to communicate and engage during the Complete Communities Assessment process. These methods and tools are divided into three approaches.

Information Sharing – The SSLTC will share information about the project at key intervals in the process. The project website will be updated periodically and will act as the main source of information for the project. SSLTC may use local print and online media to provide information about the project.

Online Consultation – SSLTC will solicit comments and feedback online through the project website using tools such as online surveys and feedback forms.

Live Events – SS LTC will hold workshops and public meetings at key intervals in the process. SS LTC will also communicate with local non-governmental organizations that may have valuable input or information to provide. SSLTC may provide the opportunity for interest holders to undertake self-led engagement activities to inform complete community context. Finally, SS LTC will assemble a working group of staff from agencies with some jurisdiction related to community completeness, to be convened as needed.

Commitment to the Community

SS LTC has resolved to strive for ‘equity in participation’ for all its public engagement processes.

Beyond Inclusion Principles

SS LTC will adhere to the principles of public engagement as described in [Beyond Inclusion: Equity in Public Engagement](#). An overview of these principles and how we will act in accordance with each are outlined below.

1. **Invite participation within an authentic and accountable engagement process:**

Salt Spring Island Complete Communities Assessment Community Engagement and Communications Plan

- **Explanation:** To foster authentic participation, we will clearly communicate the purpose of the assessment process to the community. We will use multiple channels (online, in-person, etc.) to reach diverse audiences. We will be transparent about decision-making processes and how community input will be used. Accountability involves ensuring that promises made during engagement are upheld.
 - **Implementation:** We will start by articulating the assessment's purpose and goals. We will engage community members early and consistently. We will provide regular updates on progress and decisions made based on their input. We will show appreciation for their contributions.
- 2. Plan early and proactively:**
- **Explanation:** Early planning ensures adequate time for meaningful engagement. Proactive steps prevent last-minute efforts that may exclude certain groups.
 - **Implementation:** We will begin planning well in advance of carrying out the assessment. We will identify key milestones and allocate sufficient time for each phase. We will anticipate potential challenges and plan mitigation strategies.
- 3. Establish respectful relationships with Indigenous Peoples:**
- **Explanation:** Recognize and honour Indigenous knowledge, culture, and sovereignty. Building respectful relationships is essential.
 - **Implementation:** Staff will work with Nations with treaty and territorial interests in the Salt Spring Island Local Trust Area to determine their interest in this project and facilitate opportunities for their participation.
- 4. Engage the internal diversity of a community:**
- **Explanation:** Communities are diverse, with varying needs and perspectives. Effective engagement considers this diversity.
 - **Implementation:** We will use targeted outreach to engage marginalized and difficult to reach groups. We will consider language accessibility, cultural differences, and socioeconomic factors. We will do our best to ensure representation from diverse community members in planning and decision-making.
- 5. Work in reciprocal relationship with communities:**
- **Explanation:** Engagement should be a two-way street. Communities contribute, and their input informs decisions.
 - **Implementation:** We will actively listen to community feedback. We will provide timely updates on progress and how input is being used. We will show appreciation for community contributions, whether through formal channels or informal interactions.
- 6. Tailor engagement plans to the context:**
- **Explanation:** Each community has unique characteristics and needs. One-size-fits-all approaches may not be effective.
 - **Implementation:** We will understand Salt Spring Island's specific context (geography, demographics, history). We will customize engagement methods (surveys, workshops) to fit the community's preferences. We will be flexible and adaptive as needed.

**Salt Spring Island Complete Communities Assessment
Community Engagement and Communications Plan**

7. Commit to ongoing learning and improvement:

- **Explanation:** Engagement processes evolve, and continuous learning is essential.
- **Implementation:** We will reflect on what worked well and what did not after each phase. We will seek feedback from participants. We will adapt strategies based on lessons learned. We will invest in capacity-building for our team to enhance engagement practices.

8. Advance systemic equity:

- **Explanation:** The results of this Complete Communities Assessment are meant to feed into Official Community Plan and Land Use Bylaw updates that are prioritizing increasing housing options and housing equity on Salt Spring Island.
- **Implementation:** We will analyze how policies and decisions impact different groups. We will mitigate disparities by intentionally considering equity in all aspects of the assessment. We will collaborate with community organizations working on equity initiatives.

Phase 1: PREPARE

The purpose of community engagement and consultation in Phase 1 is to:

- Inventory and share relevant data
- Determine what indicators additional to the 16 required by the Province should be measured; and

Table 1: Engagement Methods for Phase 1

Method	Details	Who	When
Information Sharing	<ul style="list-style-type: none"> • E-mail Subscriber notification of the award of contract • Update website • Salt Spring Exchange • Op-Ed in the Driftwood 	<ul style="list-style-type: none"> • Staff-organized 	By May 31, 2024
Live Events ¹	<ul style="list-style-type: none"> • Indicator workshop (Introduce project, invite interest holders to review 16 core indicators, and if needed, create additional indicators²) 	<ul style="list-style-type: none"> • Advocacy group representatives 	By June 30, 2024

Phase 2: ASSESS

The purpose of community engagement and consultation in Phase 2 is to:

- Solicit community, advocacy groups, and agencies input on findings
- Define “complete community” in the Salt Spring Island context

¹ Workshop could be facilitated virtually.

² The number and nature of additional indicators created will be determined during the workshop.

**Salt Spring Island Complete Communities Assessment
Community Engagement and Communications Plan**

Table 2: Engagement Methods for Phase 2

Method	Details	Who	When
Information Sharing	<ul style="list-style-type: none"> Update website as needed 	<ul style="list-style-type: none"> Staff-organized 	As needed
Online Consultation	<ul style="list-style-type: none"> Post findings / maps to website with opportunity to provide comment (e-mail subscribers, SS Exchange) 	<ul style="list-style-type: none"> Salt Spring residents 	By July 31, 2024
Live Events	<ul style="list-style-type: none"> Presentation of findings / map and interactive opportunities to comment 	<ul style="list-style-type: none"> Salt Spring residents (multiple sessions, different locations across the Island) Advocacy groups and citizen groups Agencies 	By July 31, 2024

Phase 3: ACT

The steps of Phase 3 are as follows:

- Solicit community input on different community change scenarios;
- Ensure that agency data is accurately used in scenario development; and
- Develop an implementation plan, monitor, and report

Staff anticipate limited community engagement and consultation in Phase 3 as the consultants will develop their professional recommendations based on the outcomes of Phase 1 and 2 and SS LTC will have to decide whether its wishes to apply these recommendations to its OCP-LUB Update Project.

Table 3: Consultation Methods for Phase 3

Method	Details	Who	When
Online Consultation	<ul style="list-style-type: none"> Post scenarios / maps to website with opportunity to provide comment (e-mail subscribers, SS Exchange) 	Salt Spring residents	By August 30, 2024
Live Events	<ul style="list-style-type: none"> Presentation of scenarios / maps and interactive opportunities to comment 	<ul style="list-style-type: none"> Salt Spring residents (multiple sessions, different locations across the Island) Advocacy groups and 	By August 30, 2024

**Salt Spring Island Complete Communities Assessment
Community Engagement and Communications Plan**

		citizen groups • Agencies	
Information Sharing	• Post final report to website	•	September 30, 2024

**Salt Spring Island Complete Communities Assessment
Community Engagement and Communications Plan**

Table 4: Those Who Will be Engaged by Activity

Indicator Workshop (Phase 1)	Surveys / Interactive Community Sessions (Phase 2 and 3)	Agency Working Group (Phases 2 and 3)	Community-Led Group Workshops (Phase 2 and 3)
<ul style="list-style-type: none"> • Salt Spring Solutions • Transition Salt Spring • Salt Spring Island Community Services • Salt Spring Foundation • Salt Spring Island Community Health Services • Salt Spring Island Agricultural Alliance • Salt Spring Island Chamber of Commerce • Island Pathways • Salt Spring Water Preservation Society • Salt Spring Housing Council Society • Salt Spring Arts Council Society • Salt Spring Conservancy 	<ul style="list-style-type: none"> • Open to all community members 	<ul style="list-style-type: none"> • Islands Trust Conservancy • Islands Trust Freshwater Specialist • North Salt Spring Waterworks District • CRD Water Services • CRD PARC • Island Health • Ministry of Transportation and Infrastructure • BC Transit • School District 64 	<ul style="list-style-type: none"> • Open to all advocacy groups or self-organized interest groups