

From: Friends of the Gulf Islands <friendsofthegulfis@gmail.com>
Sent: Tuesday, December 2, 2025 10:21 PM
To: Trustees; Executive Admin; Islands2050; Tobi Elliott
Subject: FOTGIS Response To FAR Question Today

Dear Trust Council

I would like to take this opportunity to more fully respond to the question asked of me by Trustee Elliot following my delegation today, about where Floor Area Ratio is mentioned in the Draft TPS, her assertion being that Floor Area Ratio is not mentioned in the draft. That is incorrect.

I refer you to the Glossary: **Land Use Density and Intensity** - *"Density may be defined by the number of units per given area of land. Density may also be measured by dividing the built area including all floor area, by the total area of the lot, e.g., floor area ratio (FAR).*

Given this definition, there are then several Directives in the Draft TPS where FAR could be used to redefine and enable density.

Under **Managing Growth and Development**:

Directive 3.4.1 Sustainable Development refers to "...determining the land use designation and appropriate locations and **intensities** of various uses of the land."

Under **Housing**:

Directive 3.4.11 Suitable Locations for Additional Housing refers to "Identify suitable locations that could support increased **density** for the development of safe, secure, desirable verse, and attainable housing."

Directive 3.4.13 Clustered Small Dwelling Units refers to "Support alternatives to conventional single-detached dwellings by establishing policies to permit **clusters of small dwelling units** in suitable areas."

Directive 3.4.14 Floor Area and Lot Coverage Limits refers to "**Set floor area and lot coverage limits for residential development to minimize negative environmental impacts....**"

We know that FAR is being promoted by trustees on some islands, several of which are undertaking OCP reviews. The Mayne LTC and the Trust Executive have already approved FAR bylaws there and it was stated by Trustee Maude when chairing the Galiano LTC recently, that he hopes similar bylaws would be passed on other islands.

Gabriola's "Reimagining Growth" document refers to a "Rezoning Alternative" and goes onto describe various options as "Rezoning Alternatives":

- Cluster Housing - Small homes on one lot (no subdivision); efficient land and infrastructure use; may need housing agreements and floor area limits.
- Small Unit cluster Housing - Clustered tiny homes/manufactured/mobile units with shared facilities.
- Flexible Housing - Multiple dwellings allowed per lot, within a total floor area cap; no housing agreements required.

- Density Bonus for conservation - Extra units granted if land conservation criteria are met.

Salt Spring Island's OCP review appears to be also embracing this density strategy.

Further, the existing **TPS Policy 5.2.6** requiring trustees to respect local density limits **has not been included** in the draft TPS.

Therefore, the concerns about FAR mentioned in my delegation and those of other speakers in the Public Comment section of today's meeting stand, with substantial evidence to back such concerns. And as also stated today, the implications of such a density redefinition have not been properly discussed by Trust Council, by LTCs or by the public.

Thank you again for including our delegation in the Quarterly Trust Council Meeting.

Sincerely,

Jennifer Margison, President
Friends of the Gulf Islands Society