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**Subject:** 3Ravens Affordable Housing Land Share project at 4100 Pinecrest

**Dear Denman Island Local Trust :** I have reviewed all the information available for the 3 Ravens Land Share Non-Profit Affordable Housing Co-operative proposal and even though it appears that the land share is being done for the right reasons, I still strongly object to the rezoning of the 6 hectare (15 acre) lot, currently zone Rural Residential (R2), to a site-specific zone to permit the development of seven affordable housing units under a non-profit land-share co-operative model for the following reasons:

**1. 3Ravens claims that their proposal will "prevent their property from ever being subdivided" yet-**

- the IT definition of "**a subdivision** is the legal process of dividing land into two or more parcels, adjusting existing lot lines, or creating a strata development."

- the IT states that "*a strata subdivision functions like a traditional subdivision, where the strata plan designates distinct parcels of land for individual ownership, alongside common property, like amenities.*"

3Ravens states that for all 8 dwellings there will be a permanent and "*exclusive use area attached to each home and access to the common house or possible communal laundry, workshop etc.*". **Therefore, this property will actually be a strata subdivision.**

**2. Ecosystem Focus-** 3Ravens focus is on providing affordable housing "*while protecting and caring deeply for the land*" yet a large portion of the property will be covered by an ever expanding human footprint-

*"The maximum potential floor area for all outbuildings (existing, common, new Members) is 7806 sqft (725.2 m2)".* Each designated dwelling area, which according to 3Ravens, could be a 900 sq. ft. home, cabin, a modular or mobile home or tiny home on wheels could potentially mean a trailer park like setting with a possibility of travel trailers, campers and motorhomes as well. All "dwellings" are given a cistern but will potentially be allowed more, which extends the dwelling footprint considerably once you factor in all outbuildings, parking areas etc. I live in a 10 acre subdivision divided into approx. 1 acre lots with 10 full time (mostly retired) permanent residents on 7 of the lots. The other 3 lots when used short term can double our neighbourhood population but thankfully, because we have property lines, we all get along. Having 8 permanent dwellings with a minimum of 2 per unit on a 15

acre shared property is not ideal, problematic and hard on the land. **The Islands Trust was created to put a stop to exactly what is being proposed by 3Ravens.**

As well, It appears that 3Ravens ecosystem focus and care for the land does not include the indigenous species that they immediately eliminated from their 15 acre property by erecting a deer fence. The reasons given for the fence are-

a. *"Preserve and protect the property's ecology from the indigenous local deer" which according to 3Ravens "is over-populated by the local deer, by a factor of more than 100x the normal pre-colonist density of 11" which when asked, they could not provide the source of where the numbers came from. My personal 50+ years of local experience and observations would dispute those numbers with deer possibly being on the decline here on Denman.*

b. *"Reduction of ticks, and the associated tick-borne diseases that ticks carry. Ticks are about 90% less likely within fenced off properties a couple of metres or more away from the fence. This is because ticks breed on large furry mammals for the most part, which is why they are called deer ticks." From my first hand experience, I would also dispute the above noting that ticks often arrive on birds, raccoons, mice, rats, voles etc.*

**Deer are indigenous to our island and deserve respect and inclusion into our natural fabric.** *"We're losing biodiversity globally at an alarming rate, and we need a cornucopia of different plants and animals, for the planet's health and our own." - Dianne Ackerman*

c. Their fence was also thought to *"help alleviate concerns with neighbours and also keep pets on the proper side of the fence and under control".* Which brings up the question of how will pets be controlled by individual owners? Will all 8 stratas have individual fences or tie their dogs up or are they allowed to roam the 15 acres and possibly escape when residents open the gates to leave. Dogs are an increasing problem on Denman and need responsible caregivers and ideally, a fenced yard. That being said, **fences should only be used when absolutely necessary.** Cats are even harder to control and will prey on the numerous bird species that 3Ravens listed on their property.

**3. Neighbours** on Pinecrest were expecting a quiet and extremely rural experience when they purchased their properties and will be negatively impacted from this strata by the increase in neighbourhood population density which will create more noise, dust, increased human activity and wood smoke. More importantly, this strata will seriously decrease land values and make adjacent properties harder to sell. The 3Ravens map shows a gate on the end of the property that would allow access to the property containing the environmentally sensitive Bluffs, yet 3Ravens does not know or has spoken to the adjacent land owner about accessing his/her property by this strata group. As well, this is said to be a *"self-managed "village"* and nowhere in the proposal did it state that the original property owners would be staying on the property. If a neighbour has a complaint or concern, they might feel intimidated if they had to contact the group instead of the property owner. Ensuring that all bylaw conditions and housing agreement

commitments are adhered to is solely the responsibility of the signatory to the housing agreement with no oversight by the Islands Trust unless a formal complaint is made to the bylaw officer, which again, might be intimidating for a neighbour to do.

**4. Community** impact of this and potentially more future zone changes elsewhere for cluster housing without our local government knowing Denman's human carrying capacity is irresponsible. **Our schools, medical clinic, fire department, Emergency Health Services etc. will all be negatively impacted, not to mention longer ferry waits.**

Increased wear and tear on the gravel roads from more vehicles is inevitable. Bicycle use from the Northlands would be extremely difficult and EVs and charging ports are still expensive. 3Ravens also mentioned a possible bus route expansion to the Northlands which like other infrastructure improvements increases our taxes. Having just paid our property taxes, I now know why my working class parents had to leave West Van and wonder if I will have to do the same, here on Denman Island?

Although the intention to create not for profit affordable housing is admirable, I can't help but wonder that the original 3Ravens intention might have been presumptuous- *"the original intention behind the purchase of the property from receivership, back in early 2019, was for the creation of an affordable housing land share on Denman Island."* I find it confusing that this purchase was based on nothing more than a speculation and that the IT would approve the proposal. 3Ravens even went a step further and included this statement in their application- *"We request the Executive Committee sponsor our rezoning fee and any internal legal fees, as this is for affordable housing."* Does this indicate that if a property owner uses the right matrix, any and all applications for tiny villages, cluster housing, trailer parks, co-housing, strata subdivisions etc. are automatically approved? If so, it might be time for those who came here because of the IT's "minimum 5 acre lots only" guarantee to move or perhaps do away with the Islands Trust, whose mandate has changed from **"preserve and protect" to develop and destroy!**

Edi Johnston

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