Date: March 24, 2025

To: Gabriola Local Trust Committee (LTC)

Re: Concerns regarding the Gabriola Official Community Plan (OCP) Survey and accompanying Information Guides (Guides)

Background:

As part of a comprehensive review of the Gabriola Island Official Community Plan (OCP) Review the Gabriola Local Trust Committee (LTC) has that started sometime earlier this year and is set to close on March 31, 2025. The survey can be completed on the LTC website (electronic survey) or by requesting a hardcopy of the survey (paper survey) Accompanying the survey are 7 Information Guides on the following topics: Housing, Economy, Environmental Protection, Climate Change, Connectivity, Cultural Heritage Protection and Waste & Water. The Guides are separate from the actual survey but can be accessed on-line or by requesting a paper copy.

Recently the LTC added on the Project webpage a Freshwater Footprint Q & A information sheet and a link to a Freshwater Footprint Survey with a closing date of April 18, 2025. However, the following discussion does not include this new survey.

Discussion:

A survey linked to an OCP review could seek the public's view on suggested policy changes, ask for changes the public sees as necessary or include both approaches. Regardless of the approach taken, the survey should be clear on which approach is taken, ask questions that are readily understandable, provide accurate information, and avoid as much as possible any bias in the wording of questions and information provided. The range of options given should be as complete as possible and there should be consistency in terminology used.

The questions and options on both the electronic and paper surveys should be identical to ensure the integrity of the data obtained and any conclusions derived from that data. Survey questions that allow respondents to give additional details regarding their selection should be available to all respondents, regardless of their choice.

The reasons provided by respondents should also be made public. Doing so gives those who did not complete the survey and those with a different view an opportunity to consider other perspectives. Moreover, the reporting out of the survey should not be a summary in order to avoid any potential bias.

An electronic survey' that has edits limiting choices are in effect are imbedded "instructions" and a paper survey should contain the same limitation in the written instructions.

Last, a survey should not be changed while it is underway unless the public is made aware and those who completed the survey prior to any substantive change given an opportunity to reassess their previous response(s). Otherwise, the integrity of the data may be affected and some respondents excluded from considering an option.

My concerns relate to the questions and options provided, inconsistencies between the electronic and paper surveys and the information in two of the Guides.

Following is a summary of issues identified with more detail in Appendix 1 (Housing and Economy Guides) and in Appendix 2 (Survey).

Issues/questions:

- Some survey questions are unclear and open to interpretation and answers dependant on how the question is understood,
- Some of the question appear to have a bias in support of increasing density,
- The response choices are at times too limited, failing to capture the full range of potential public opinion,
- The survey is heavily focused on questions regarding housing which tends to belie a "complete OCP review",
- Environmental protection questions are limited to use of Development Permit Areas, and other possible means to address environmental protection appear are not referenced,
- There are no key questions on the public's support on
 - o residential density increases beyond what is allowed for under the current bylaws,
 - establishing a "carrying capacity" for the island, something referenced in the current OCP as a yet unrealized policy,
 - o inclusion of a "precautionary principle" in decision making, which the latest draft Trust Policy Statement includes as a Guiding Principle for decision making,
- there is no information on the impact/guidance of the Islands Trust's regional governance structure and the Trust Policy Statement on local land use planning decisions,
- Changes to the electronic survey while active:
 - The initial version of the electronic survey had a system's edit for questions 5 and 17 that prevented those who selected the "none of the above" option from using the option of "other".
 - The electronic version was amended sometime early March to remove the option of "none of the above" for question 5. The option of "none of the above" was also removed from question 17 but rather than just its removal, the option was replaced with the "I cannot further reduce my vehicle use" which essentially replicated the option just removed. However, the revised option did not continue the system's edits to preclude use of any other option. The changes to these questions were to rectify the difference in options with the paper survey.
 - Questions 9 and 10 initially did not have an option of "none of the above". A second change occurred in March whereby these questions had the option of "none" added (essentially a rewording of "none of the above") to rectify the difference with the paper survey options. However, selecting "none" did not prevent the respondent from selecting other options, unlike other questions on the electronic survey which had such a limitation.
 - Ounknown is the effect of these mid-stream changes on data. Was data for questions answered prior to the change deleted or amended? Are the two versions of the survey kept as separate sources and will these be reconciled somehow?
- Option of "other"
 - The use of the option "other" is used extensively. The only for this option is a "please specify" which could, depending on how this is interpreted, be used to:
 - (a) give further information supporting a selection(s) made,
 - (b) identify a new option (e.g. an omission), or
 - (c) allow for a response rather than the question being bypassed due to the question and options,
 - o the instructions could have clarified how the option of "other" is or could be used,
- Questions 6 and 7 have an edit on the electronic survey that limits the respondent to 1 selection, but the paper survey has no comparable instruction. Consequently, those completing the paper survey are less constrained in how the options are used,

- Question 11 has the option of "they should not be permitted". The electronic survey has no comparable option. Those opposed to the options are forced to use "other" or not answer the question. Will those who bypass the question be recorded as a "none of the above" response?
- Question 8 provides an opportunity to give written detail on selecting "yes", but no comparable
 opportunity was afforded to those who selected "no" or "I don't know". However, the electronic
 survey has no system's edit and regardless of the primary choice, information could be
 entered. But many may just skip over the question. Will those who skip the question be
 considered to have given a "no" response?
- Two of the Guides accompanying the survey have incorrect information which can influence the public's understanding and responses to the survey questions. (see Appendix 1 for details).
- Will the reporting out of the survey include all responses, including the written text given by the respondents? A summary of responses may be influenced by a bias and prevents the public from knowing of other views/ideas.

The above issues could lead to a distorted representation of public opinion. Full transparency of all public feedback is important for good decision making.

I hope the Gabriola Local Trust Committee will consider these concerns and answer my questions. And if there are errors in my comments and reading of the Guides, please let me know where and how. None of us is infallible.

Respectfully submitted,

Kees Langereis Gabriola resident

APPENDIX 1

INFORMATION GUIDES

Of the 7 Information Guides provided, the Housing Guide and Economy Guide had incorrect or unclear information. The red text in the extracts indicates what is referenced in the comments and questions column.

Housing Guide Extract

Multi-dwelling residential developments on Gabriola Island are allowed only for special needs residents, seniors, or as affordable housing. "Affordable housing" refers to homes rented or owned under a housing agreement that's registered on title in favor of the Local Trust Committee.

Secondary suites are permitted on properties that are 2 hectares (5 acres) or larger. Separate accessory dwelling units (ADUs) are considered single-family affordable housing and are also permitted on properties that are 2 hectares (5 acres) or larger, but should not exceed 65 square metres (700 square feet).

Comments questions

The text "or as affordable housing" is incorrect. It should say "and low to moderate income families". Multi-dwelling affordable housing policies apply the 3 groups (special needs, seniors and low to moderate income families). All three require a housing agreement. The existing seniors multi-dwelling development does not have a housing agreement as it was not registered on title at the time of rezoning.

The paragraph has errors and terminology that may cause confusion. The term "secondary suite" is defined in the Land Use Bylaw as a self contained dwelling unit that could be a suite in the primary dwelling, a suite in an accessory building or a standalone dwelling (former cottage) and must be accessory to a principal dwelling on the lot.

The phrase "accessory dwelling unit" is not defined or referenced in the OCP but it is used (but not defined) in the Land Use Bylaw to describe a principal dwelling that is a permitted "accessory residential use" (ie not as a principal use) in the following 3 zones: commercial, district commercial and yacht outstation.

There is no longer a 700 sq ft size limit for secondary suites; they are now limited to a maximum 968 sq ft except for a suite within the principal dwelling in which case the maximum size is the lessor of 40% of the principal dwelling's size or 968 sq ft. The 700 sq ft reference in the OCP is residual policy that was inadvertently left in. It should have been repealed in the 2018 OCP amendment.

The Gabriola Island OCP's conservative approach to increasing housing density is partially based on the assumption that densities existing on undeveloped land can accommodate housing needs.

The reference to a "conservative approach" introduces a bias in the question. A more neutral wording would be: "The current OCP policy states that the densities existing on undeveloped land can accommodate future housing needs". Moreover, saying "partially based" implies there are other factors or assumptions in play under this policy. These should

Exploration of Density Transfer and Density Bank

Weaknesses:

- Density transfer and density bank policies do not allow for a net increase in density.
- density transfer and density bank policies place a cap on housing supply which can result in stagnant supply and contribute to increasing property costs

be identified so the public is given a complete picture and not left to speculate what those could be.

The first bullet is incorrect. Density transfers from Forestry zoned lots increase the number of residential densities (see OCP for details). Density transfers from Resource zoned lot are density neutral.

The second bullet: It is unclear whether "density transfer" refers to the density bank process or the density transfer provision of the OCP (e.g. transfer that added parkland to the 707).

Does density bank policies refer to there being no densities in that bank? If so, the statement is misleading. If the density bank is empty the OCP was amended to add additional densities for an affordable housing project.

See below OCP extract:

ii. if there are insufficient densities in the Density Bank, the shortfall in densities may be provided

based on the merits of the proposal, using the following criteria:

☐ lot size;

- □ proximity to the Village Core, public transportation and community amenities □ availability of sufficient water supply for the proposed number of dwelling units; □ availability of an area of sufficient size and appropriate characteristics to meet provincial health authority requirements for an on-site sewage treatment system capable of servicing the proposed number of dwelling units;
- □ demonstrated community need; and provided that a housing agreement is in place to ensure affordability is maintained in perpetuity.

ECONOMY GUIDE Extract

 Forestry Lands: Forestry lands are primarily for tree-growing and timber production. These areas aim to support sustainable forestry while preserving environmental and recreational values. The plan supports maintaining large

parcels (minimum 60 hectares) and

restricts subdivision except for

ecological reserves.

The OCP identifies three types of resources:

Recarricultural lands: this

Re: agricultural lands: this OCP designation is set under the OCP not the ALR. Although all current agricultural lands are also in the ALR, the zone does contemplate the possibility of a such a lot not being in in the ALR.

Re: "Aggregate Resources": The Resource designation does not include "aggregate" in the title nor is the Resource designation specific to aggregate

- Agricultural Lands: Agricultural lands are designated in the Agricultural Land Reserve (ALR) and are vital to Gabriola's rural economy and character. Policies aim to preserve large parcels of farmland, limit subdivision, support small-scale agricultural operations, and encourage sustainable farming practices.
- Aggregate Resources: Extraction of aggregate resources (e.g., sand and gravel) falls under provincial control, but local government influences the processing activities. There are advocacy policies for limiting environmental impacts and requesting inventory assessments of resources.

Housing on land designated forestry, agriculture and resource lands is limited to one single-dwelling residential unit.

extraction. A more apt description of the Resource zone would be to describe the objectives cited in the OCP: i.e.

- "1. To preserve large parcels of land in a largely unsubdivided state;
- 2. To maintain representative areas of rural landscape on Gabriola; and
- 3. To provide transitional areas between the residential and forestry and agricultural parts of the Community"

The potential for aggregate extraction is governed by the Mines Act and such extraction is just one possible use possible in this zone.

The sentence in red text is incorrect. Lots designated as Resource, Forestry and Agriculture zones are permitted to have a secondary suite if the property is 2 hectares or larger.

APPENDIX 2

SURVEY Questions

The following table lists the main text of the electronic survey in the first column and comments/questions in the second column. Red text indicates what is discussed.

Questions with more substantive concerns

SURVEY QUESTION **COMMENTS QUESTIONS** 5. Assuming there is enough water and minimal The second bullet could be explained more environmental impact, which of the following housing clearly as allowing a secondary suite and the options would you support? (Select all that apply) principal dwelling each becoming a strata under Secondary suites or accessory dwellings on the Strata Property Act. lots smaller than 2 hectares (5 acres) Accessory dwelling units being owned There is also overlap between options (e.g. separately from the principle dwelling unit "tiny homes on wheels" and "multiple small o Multiple dwelling units on lots over 1 hectare homes on wheels or not on wheels clustered on within 1 km of the Village Core a single lot".) Is "small" versus "tiny" a More than one residential unit on commercial reference to a different maximum "dwelling size"? Or is "tiny" referring to portability? o Tiny homes on wheels RVs as permanent dwellings o Multiple small homes (whether on wheels or None of the above options refer to them being not on wheels) clustered on a single lot "affordable" which presumes they would be Multiple small homes within a combined market rent or rate owned properties. maximum floor area for all dwellings instead of one large home The paper survey does not include the option Worker housing in industrial areas "None of the above". Respondents completing Worker housing in institutional areas (eg. the revised survey question would have to school, church, medical, fire hall) either bypass the question or use "other". Worker housing in parks and protected areas Changing survey question options while a Other (please specify) None of the above (Note: this option was survey is active jeopardizes the data and removed from the electronic survey conclusions. The revised survey now allows sometime in March) presumably to mirror any or all of the options to be selected. the paper survey options. 6. Should more residential lots be created on What would fall into the "other" category. This is Gabriola Island? a Y or N type question. Or is this intended to be Yes and option of "unsure", "don't know"? Or is it an o No option to indicate a Y or N along with reasons? Other (please specify) The web version only allows one selection. The paper survey has no comparable instruction. How will information added to "other" be treated if the respondent has also selected the Y or N option on the paper survey? 9. Regarding agricultural lands, which options for Is "agricultural lands" limited to land in the additional residential density do you support? ALR? Or does it also include lots in another Check all that apply. zone where agriculture is a permitted o Allowing density equivalent to what is secondary use? permitted by the Agricultural Land Commission

- Additional units for workers
- Where adequate freshwater water exists, opportunity for multiple small units with a combined maximum floor area
- Additional units when land is located close to the village core
- Other (please specify)
- None: NOTE: this option was added to the electronic survey sometime in March".

The third option refers to "available water". Wouldn't that be applicable to all the options? It also implies the other options are not bound by that factor.

The paper survey includes the option of "None" (rather than usual text "none of the above") but the online version had no comparable option. Those who completed the earlier electronic survey and would have selected "none" would have to either use "other" or bypass the question.

10. Regarding forestry lands, which options for additional residential density do you support? Check all that apply.

- Additional units for workers
- Where adequate freshwater water exists, opportunity for multiple small units with a combined maximum floor area
- When land is located close to the village core
- Other (please specify)
- None: NOTE: this option was added to the electronic survey sometime in March

The second option condition implies water is not a factor for the other options.

The paper survey includes the option of "None" (rather than usual text "none of the above") but the electronic survey had no comparable option until the March amendment.

11. Short-term vacation rentals should be permitted in: (Select all that apply)

- Secondary suites
- Cottages
- o Bedrooms in homes
- Entire homes (principal residences)
- Other (please specify)

The paper survey has the option of "they should not be permitted" which is comparable to a "none of the above" option

There is no comparable option in the electronic survey. Respondents opposed to this must either bypass the question or use "other".

17. What would help you reduce your vehicle use? Check all that apply.

- More access to electric bike charging stations
- Living closer to the Village Core
- Separate paths for bikes and pedestrians
- More parking at the ferry terminal
- Living closer to a grocery store
- More easily accessible walking routes to the Gertie bus route
- Other (please specify)
- None of the above (NOTE: this option was removed form the electronic survey during the month of March) and replaced with the option on the paper survey of "I cannot further reduce my vehicle use".

Some of the options would entail the responder to move from where they live (ie question is posed as "what would help **you**)".

How feasible would this be for most property owners or renters?

Questions with minor queries

Survey Question	Comment questions
1. My age group is:	Difference between paper and web versions:
	the paper survey option is age 0 to 14. The
o 10-14 years	online age range is 10-14 years. A minor
o 15-24 years	editing issue as few persons under 10 of age
o 25 - 54 years	will complete the survey but parents may
o 55 - 64 years	support them doing so or complete on their
o 65+ years	behalf.
	The electronic survey has no system's edit
	limiting it to 1 selection.
2. I have lived on Gabriola for:	Difference between paper and web versions:
Less than 1 year	the paper survey does not include the "1 year"
o 1 year	option (ie has "less than 1 year and 2 yrs).
o 2 - 4 years	
o 5 - 9 years	The electronic survey system's edit limits it to 1
o 10+ years	selection
2 Lam a	is "ather" intended to continue the beautier
3. I am a o Renter	is "other" intended to capture the homeless
o Renter o Owner	population, temporary residents or visitors?
Other (please specify)	The electronic survey system's edit limits it to 1
	selection,
4. I am a	is "full-time" meant to capture those whose
 Full-time resident (more than 6 months per 	principal residence is on Gabriola, whether as
year)	a property owner or renter? Will the survey
Part-time resident (less than 6 months per	results link questions 3 and 4? This is the only
year)	question that offers a "prefer not to say". Some
Prefer not to say	may wonder whether "resident" excludes the
	homeless or visitors from elsewhere in BC.
7. Commercial properties are permitted to have	What would fall into the "other" category. This
one residential dwelling. Should more than one	is a Y or N type question. Or is this intended to
dwelling be permitted?	be "unsure", "don't know" or an option for more
o Yes	detail on the Y or N?
o No	The electronic survey system's edit limits it to 1
o Other (please specify)	selection
8. Should there be more commercial areas on	"I don't know" shows up here in place of "other"
Gabriola Island?	and is not used elsewhere. Is "I don't know" a
o Yes	replacement for "other" rather than an option to
o No	provide reasons for the Y or N? Consistency
o I don't know	in use of terms for options would make it
If yes where would you like to see commercial	•
areas?	clearer especially if examples are given or
	some instruction. Also, here those who
	indicate "Yes" can provide supporting
	information but those who select "no" have no
	option to explain why.
	The electronic survey system's edit limits it to 1
	selection but regardless of the primary

	selection (Y., N or unsure) information can be put into the "if yes" option.
12. Many Gabriolan's get their water from a number of sources. Please select the sources where you get your water from. Always Most Sometimes Hardly Never Of the time Groundwater Rainwater Surface water Water delivery	The question applies to potable and non-potable water based on source of water. Water delivery could be for either depending on whether cisterns are used as a source of potable or non-potable water.
13. If you usually use groundwater and run out of water during the year, when do you typically run out of water? Check all that apply. I do not run out of water I do not use groundwater January February March April May June July August September October November December	By applying a test of "usually using groundwater" muddies how respondents may answer. Does "usually" mean "primarily? If both groundwater and rainwater catchment are used for different purposes how will a respondent understand whether the question is applicable. The on-line survey has no system's edit. Consequently, all the options can be selected, including months when water runs out and the first 2 options.
14. If you have water storage, how many litres of water do you typically have delivered for domestic residential use? None 1 - 1000 1001 - 5000 5001 - 10,000 10,001 - 15,000 15,001 - 20,000 20,001 - 25,000 25,001 - 30,000 30,001+ 15. Have you experienced any of these issues	Is this an annual amount" delivered for all uses (eg residential, commercial, gardening etc) or is "for domestic residential use" limited to potable water for the dwelling? The other "water" questions do not refer to "domestic residential use" so presumably the answers to those questions could include water for other uses. There are no system's edits. The respondent can select "none" and any number of other volume amounts for different uses. The paper survey does not include the option
relating to storm water on Gabriola Island? Check all that apply. o I haven't experienced any issues relating to storm water o Erosion o Slope instability	of "other". The online version has no edits and allows the selection of all the options, including the 'I have no issue" option.

- Flooding
- Other (please specify)

16. How do feel about requiring rainwater capturing for all new commercial and residential buildings?

- I support this
- I do not support this
- Unsure

The electronic survey's systems edit limits the selection to one option.

Referring to how one feels about a policy is asking for an emotional response. Isn't it better to ask if the individual supports or disagrees with such a requirement. Some could support it emotionally but wouldn't for a non-emotional reason.

How does this fit within a change to an OCP policy?

18. Where do you go to connect with the Gabriola Island community?

19. If there were Development Permit Areas focused on protecting the natural environment, what environmentally sensitive areas would you prioritize? (Please rank your choice from most important to least important)

Introducing the question with the qualifier "if there were" is marginally misleading as there are current DPAs for some of the options. There are environmental DPAs in effect and some respondents may assume there aren't any if they have not carefully read the separate information guides.

The info guides refer to other options, but the Survey question is solely focused on DPA options. Missing are questions related to options such as limiting development and growth management.

Why not ask if the current DPAs are adequate or if they need to be improved and if so how. Another question could be if there are specific areas still needing protection.

The paper survey uses the phrase "please label from the most important (1) to least important (8). There are only 7 options listed so either a typo or an option was removed.

There are no questions asking for suggested changes or other ways to enhance environmental protection which implies environmental issues can be dealt with DPAs only.

Adding options of "other" and "other than by a DPA" would help garner more ideas.

1 ■ Habitat corridors 2 ■ Groundwater recharge areas 3 ■ Endangered species habitat 4 ■ Steep slopes 5 ■ Shorelines and marines areas 6 ■ Forested areas 7 ■ Wetlands

20. Are there other things you think could be protected by a Development Permit Area?

What would be considered under "other" as an environmental protection "thing"? Is it an area or a "raptor tree"? Providing an example in the question may help clarify what is intended. The term "thing" is odd one to use in this context.

	Is it seeking support for a Cultural Heritage type DPA? Examples would help.
21. Do you think there are environmentally significant areas on Gabriola in need of protection that are not currently protected? If yes, which area(s)?	In addition to questions 8 and 22, this question allows for additional information on a "yes" response. But a respondent intending to say "no" would have to bypass the question. There should be a Y or N option and even a "I don't know" or "unsure" for the sake of consistency with other questions. Asking for ways to protect such areas would also help gather better input. Will those who bypass the question be considered to have given a "no" response? Will those who provide information that indicates a "no" response have their responses recorded as such?
22. Have you noticed any environmental changes	See question 21.
on Gabriola Island you think might be linked to climate change? If yes, what change(s)?	
23. Do you have any suggestions on what could be done to mitigate impacts of climate change when it comes to: o Increasing housing options o Preserving and protecting ecosystems o Connecting to parks, recreation, transportation and public spaces o Freshwater, solid and liquid waste services o Agriculture, forestry, and commercial and industrial business	The first option reflects the main agenda of this survey: increasing residential densities. A more neutral wording would be to list it as "housing". Without some suggestions on ways to address the above, I suspect people may miss suggestions such as reducing densities by way of down zoning, decreasing lot coverage or minimum lot size for subdivision?
	What is meant by "connecting to" a park? Is it about "trails" leading to a park. Unclear to me.
24. What questions do you have about Indigenous Cultural Heritage and Indigenous perspectives as they relate to Gabriola Island?	The paper survey has an introductory paragraph which is not included in the online survey
25. (Optional) Provide your email or contact information below to be entered into a prize draw for completing this survey.	Why is this info optional? Without this info multiple submissions from one person could be more likely
NameEmail AddressPhone Number	The paper survey text asks for a name and email address but not a telephone #.
26. I would like to receive emails regarding future Gabriola OCP engagement opportunities	This question is omitted on the paper version.
27. In which general area is your property located? Select one	The question does not include an option of "none of the above". Is the survey limited to island residents?