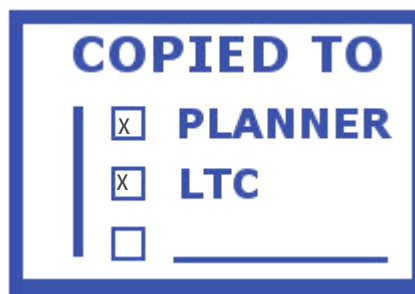


From: Tim Maki and Rebecca Ewing  
[REDACTED]  
[REDACTED]



July 23, 2020

Dear Mayne Island Local Trust Committee,

In late June we became aware of a development proposal for our neighbour's 10 acre property on Village Bay Road. We have also read the preliminary staff report prepared for the July 27 meeting of the Mayne Island Local Trust Committee. We support initiatives to improve housing availability for Mayne Island residents, including rental and ownership opportunities. However, we strongly oppose this proposal as we have laid out below. We encourage you to not accept the application, saving the Housing Society the expense of preparing additional materials for this proposal and allowing them to focus on a more appropriate solution.

1) Risk to Rural Zoning

The Village Bay Road corridor and the rural zoning given to it creates a buffer between the higher density village and the rest of the community. It is valued green infrastructure. Rezoning would fragment this corridor and reduce the ability for the Island to channel development into the mixed-use walkable centres currently on the island. Housing developments promoting affordable homes and rental units could be used to add value to existing centres by growing into vacant/underutilized lots where environmental values are lower.

2) Risk to our Farm Business

We have been building a farm here for the last 7 years. The most productive piece is next to the proposed housing development. We are worried that the increased density and proximity of the development to our farm operations will harm our business. The Islands Trust should protect existing farm businesses by maintaining the rural zoning. We picked this area because it was rural zoned and have made substantial investments of time to build a business that fully employs two people now. We want to stay on this island and continue to develop the farm.

3) Risk to Ecosystem Protection

Part of the vision of our farm business is to work within the ecosystem and provide a bridge to restoration of the property to provide ecosystem values typical of the Coastal Douglas-fir Biogeoclimatic Zone. Our approach is to use the productive forest edge to grow marketable crops, while allowing and encouraging the natural forest canopy to grow back. We aim to create a profitable business model that also creates valued ecosystem values. There is far more tree coverage and native understory plants now than when we started, and we have a viable business. We are proud of that.

The parcel proposed for development is identified in the Official Community Plan (OCP) Schedule F as supporting coastal Douglas fir ecosystem values - one of the most endangered

and least protected zones in the province because most of it is in private ownership and at risk of development. We note that the Islands Trust Nature Conservancy also identifies the property as containing important ecosystem value. Governments at all levels have identified the importance of retaining and building back endangered Coastal Douglas fir ecosystem values and working with landowners to do so. The current OCP underscores the importance of these values and identifies significant ecosystem values in the property proposed for development, and in surrounding properties. The proposed housing development, rezoning and subdividing would impair the ecosystem values on this property, ours and neighbouring parcels by further fragmenting and degrading the forest.

The Islands Trust Act defines the object of the Trust as “to preserve and protect the trust area and its unique amenities and environment for the benefit of residents of the trust area and British Columbia generally”. The ecosystems and naturalness of this island matters. The rural zoning and the 10 acre parcels along Village Bay Road have had significant benefits to the island. Village Bay Road is for the most part a wonderful treed route that welcomes residents and visitors. Affordable housing as an “amenity value” should not be used to trade away endangered ecosystems and this special forest corridor. That is in direct conflict with legal object of the trust and in conflict with protecting key ecosystem values identified in the OCP.

#### 4) Risk to Water Quality and Availability

We have signed on to our neighbours’ letter regarding concerns about water.

Any consideration of water availability needs to look at all approved zoning potential for water use, whether or not constructed yet. For example, on our property, we plan to build a second home on the eastern part of the property, likely tapping into the same aquifer as the proposed development. Other neighbours may also have pre-existing zoning potential to add a cottage that would rely on the same aquifer.

Our property and Maple Drive neighbours already deal with water runoff problems. The effects on water runoff of the 2010 logging of our property at 351 Village Bay Road is a prime example of what can go wrong. The logging led to reduced ability of the land to store water leading to high levels of run-off into downslope neighbors’ yards. Even with a ‘light touch’, the new project will undoubtedly involve significant forest clearing and the same sorts of risks, worsening the run-off problem.

The current rural zone along Village Bay Road helps protect critical water resources and manage water flows in the wet season. The development poses unreasonable risks to groundwater sustainability for the neighbours and will further reduce the ability of the uplands to hold water.

#### 5) Density of the Proposal is not Suitable for Mayne Island

The cluster housing proposal would create a higher density development in an area of Mayne that has been designated rural. The housing development is atypical for smaller gulf islands.

Most others are on bigger parcels and situated with much bigger buffers and a strong focus on affordable home ownership. Some examples from an initial review are below.

- Rainbow Ridge - 20 units - 51 acre parcel purchased by Cortes island seniors society
- Denman Green - 20 acres
- Galiano green - 20 homes - ten acres aiming for affordable home ownership - 15 owner built - 5 long term rental 15 metre tree retention zone and additional 15 metre buffer to minimize conflict with neighbouring agricultural activities , 30 metre setbacks to protect riparian areas
- Hornby Beulah creek - 20 units, 18.5 acres

#### 6) The Project Relies on our Property to Provide a Buffer Zone

The project proposal tells the public and planners that there is a substantial forest buffer. Part of that buffer is our forest land. The proposed development site is highly visible from our property line on the east side. We are concerned that it will erode our much-valued privacy and make it more difficult for us to continue to pursue our objectives for ecosystem restoration and farm profitability. We should not be expected to provide a forest buffer for this development

There are a large number of wildlife trees in the buffer (on our side and the neighbour's side) which are very likely to be deemed 'hazard' trees from an insurance perspective. They will likely be required to be removed as the neighbour's housing development is built and in the post development period. For us, there is a high likelihood that we will incur increased legal liability as our existing and growing forest is viewed as a risk to the proposed structures.

If the proposal were to go ahead, the community should expect the developer to provide assurances that they can, on their land, provide a buffer to protect the viewscape and limit the risk of us having to log on our side to remove wildlife trees that are considered a hazard liability to the new development, but that are essential for our ecosystem restoration objectives.

#### 7) Other Concerns with the specifics of the proposal

We have not been involved in the Housing Society work that led to this proposed solution, but we have some technical questions/concerns with what we have seen. Below some thoughts.

##### a. The Proposed Development does not meet the Amenity Zoning Requirements

Guidelines for amenity zoning identify affordable housing as an "amenity". Yet, this proposed housing development is being promoted as a mixed development including rental units priced according to the market and some units being identified as affordable. We have not seen a clear description of the financial details for the proposal, or which segment of the island population in need that this development is targeting. But, we do not understand how market based pricing for rental units can meet the test of affordability as intended under the OCP's amenity zoning guidelines.

b. The Project is in Conflict with Other Affordable Housing Initiatives on Mayne

This cluster housing proposal does not consider the potential for more dispersed, private sector provision of rental housing, nor ownership options. It competes with the private sector – the construction of 10 rental units (20 bedrooms as we understand) unfairly competes with current private sector initiatives and policy instruments that are intended to make the creation of rental stock attractive to private land owners.

Previous reports by the Islands Trust since 2011 have laid out many alternative incentives and approaches to increasing housing availability, some of which have been implemented. These proposals were developed with care and attention to Mayne Island’s rural character and provide options for regulatory and/or policy changes that could help to increase housing supply without embarking on a high density housing complex in a rural designated zone.

An assessment of how well the previous changes to address the situation are meeting needs of Mayne Island renters should be conducted.

As far as we’ve seen, the development proposal does not address or improve affordable home ownership to the island which is what most other gulf islands are aiming for.

c. The Proposal does not clearly show how Management by the Society in Perpetuity would work

We have not seen the analysis of the Society’s business model or the specific model of the proposed housing development to have a clear sense of whether all the risks have been sufficiently accounted for to deem the proposal to be sustainable in the long term. We do feel that such a review is critical before the residents on the island commit to implementing any housing developments or this sort. It is the community that will be asked to bear the burden in the long term - who bears the risk if finances don’t pan out?

In closing, we hope you take these concerns to heart and do not accept this application. And we hope the society can work to either find a non-rural location for the housing complex proposal – or better in our opinion, work with government funding programs and existing landowners to provide a more dispersed solution to increasing long term rentals and affordable ownership options on the Island.

Sincerely,

Tim Maki and Rebecca Ewing

████████████████████  
████████████████  
████████████████