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To: SSIInfo
Subject: Proposed Bylaw 530

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Members of the SSI LTC:

I sympathize with the predicament that Salt Spring finds itself in with regard to affordable housing, although as we know, this issue is national - even international - in scope. It is amplified by the fact that this is an island with limited resources and an environment that has long been recognized as needing protection from overdevelopment.

Proposed Bylaw 530 is, however, ill-conceived and could do untold damage to the community we seek to preserve. I find it incomprehensible that the definition of density should be eliminated from the OCP; that in fact, density doesn't even matter because many local governments already calculate density by including ADUs. Well, no. Adding accessory dwelling units to residential units, according to the Case Studies and Best Practices report from BC Housing cited by your own staff report, is an example of "invisible density" - **adding density** to generate affordable housing units. To have such a bylaw on the books in perpetuity, in contravention of the OCP requirements for "few and minor" exceptions, will threaten the future of this island. This island has a carrying capacity and it needs to be recognized. It cannot be indiscriminately changed.

I do not believe that affordable housing ought to be the purview of the Trust. The Trust cannot have competing mandates, because the environment will always lose. Do more to limit short term vacation rentals, and police them, mandate business licences. Establish seasonal worker camps and haul water in if you must - get businesses actively involved in problem solving. That's what they did in Oliver and it's a success. The rest is up to other levels of government, and the pressure we citizens can bring to bear on them. The Trust must focus on its preserve and protect mandate.

I also believe it would be a mistake to cultivate a divisive narrative where those who have larger homes or second homes on Salt Spring are portrayed as too privileged and undeserving of their good fortune and they should be taxed to fund those less fortunate. Isn't that what our current progressive tax system does? Keep in mind that proceeds from implementing the speculation and vacant home tax on Salt Spring will go into provincial coffers, not directed at our problems, and would have a negligible effect on availability of rental units here. Who would rent out their vacation home long term? The tax was specifically aimed at urban areas where investors were buying and flipping.

Finally, to avoid needless repetition, I would like to state that I stand firmly behind the remarks submitted by Frans Attorp about proposed bylaw 530.

M. MacMillen

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