

**Jason Youmans**

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**From:** Frants Attorp [REDACTED]  
**Sent:** Thursday, May 16, 2024 8:42 AM  
**To:** SSIInfo; Laura Patrick; Timothy Peterson; Jamie Harris; Stefan Cermak; Chris Hutton; Jason Youmans  
**Cc:** Minister, MUNI MUNI:EX; Olsen.MLA, Adam; directorssi; May, Elizabeth - Riding 1A  
**Subject:** Salt Spring OCP Update Project

**To: Salt Spring Island Local Trust Committee**

I am convinced the OCP Update you are now planning is illegal. You may believe Section 3 of the Islands Trust Act has been nullified, but you are mistaken; no local government or agency such as the Islands Trust can ignore provincial legislation.

So where is the environmental focus of the OCP update process? You are going to create a whole new OCP based on BC's Complete Communities Guide which focuses on four key areas of concern: housing, daily needs, transportation, infrastructure. Can you see what's missing?

But even that document includes this first step: "Identifying a community's goals is an important part of preparing to do a complete communities assessment. These goals will inform the scope and scale of an assessment, as well as the data inputs needed to undertake the project." Please tell me where in the current process you are giving the community an opportunity to discuss goals, or a vision for the future, and specifically, the removal of restrictions on growth? You seem to have missed that important step.

In looking at your list of Guiding Documents, I see there is only one very general environmental study: the CRD's Salt Spring Island Watershed Protection Plan. But even that plan contains this: "Attaining sufficient, high quality, and statistically defendable data on water resources is an essential pre-requisite to successful future management."

So where is that "high quality, and statistically defendable data"? A staff report from last year regarding a bylaw to permit ADUs in all zones indicated there is no data regarding water, the environment, servicing, and infrastructure. Furthermore, a January 22, 2021 staff report states: "Due to the limited technical capacity and resources available on staff, specific regulatory tools on combating climate change, specific transportation

studies and measures, specific ecosystem analysis as it relates to environmental regulations, specific quantitative water/waste-water/storm water studies, or any specific quantitative social-economic data analysis on housing will not be part of this Housing Action Program."

Despite this lack of data, the Trust's own Housing Action Program website promises "environmental sustainability" and states: "Issues such as water availability and the moratorium on new connections to the North Salt Spring Waterworks District (NSSWD) community water system, storm-water and sewer systems, active transportation infrastructure, innovative site and building design, arts and culture, and the archaeological significance will all be examined in the process." If there are no studies to support the environmental claims, they amount to little more than greenwash.

I notice that the Housing Action Program Task Force's Summary of Recommendations has now been removed from the Housing Action Program website only to reappear on the list of Guiding Documents for the OCP update. That summary contains this: "Our goal is to support improved housing outcomes for residents of Salt Spring Island, particularly those in greatest need, and in ways that maintain and improve the environmental quality of the island and the surrounding waters of the Salish Sea." Again, where is the data to show this "improvement"? Are these reassurances in the summary also greenwash?

The OCP Update Terms of Reference claims to have this Project Goal: "The goal of the Salt Spring Island OCP-LUB Update Project is to increase housing options and housing equity on the island in ways that integrate: advance the interests of First Nations with treaty and territorial interests in the Salt Spring Island Local Trust Area; enhance Ecosystem integrity and connectivity; and build climate change resiliency. " Again, how can you attain any of the stated environmental goals without having complete and up-to-date data? Is the entire Terms of Reference also a form of greenwash?

Have you forgotten that the minister of municipal affairs has to sign off on the new OCP? Given that you are obviously violating your duty to exercise the precautionary principle and protect the environment as expressed in the Islands Trust Act, I wonder if you will obtain that signature. I respectfully ask that you to go back and start this whole OCP update process over, but this time, in a way that has more integrity and credibility, and leads to a product that respects provincial law and can be shown to truly reflect the wishes of the majority of Salt Spring Island residents.

Yours truly,

Frants Attorp