Good Morning, My name is Eulala Mills, I am Opal Clarke’s daughter. I live at 7635 Anderson Drive.

My family have been a part of this community as visitors, part and full time residents since 1967.

I am here this morning to speak on behalf of the Hornby Island Short Term Rental Association board and our 100 local Short Term Rental members about the March 29, 2022 APC recommendations that recommend removing Short Term Rentals as a legal property use from the Hornby Island Official Community Plan.

We all know Hornby is 2 ferries and a highway drive away from any urban center, we are not a bedroom community or suburb that hosts a city’s workers. The rural character of our home is why visitors come to stay here. Our Short Term Rental visitors are actually long term members of our community. Almost 60% have been coming to Hornby for more than 10 years[[1]](#endnote-2). 97% come because of the parks and beaches[[2]](#endnote-3) and more than ¾ because of our rural character[[3]](#endnote-4) – Short Term Rental visitors value what we value.

When writing our Official Community Plan our community insisted that large scale vacation properties, such as motels and hotels, were not wanted. To support visitors and maintain a rural feel, our solutions have been to enable a small number of family resorts and B and Bs, camping and glamping and, Short Term Rentals.

With extensive consultation we encoded Short Term Rentals in our official community plan in 2011 and 6 years later validated again, in and Islands Trust Survey, that Short Term Rentals are supported by the majority of our community.

There are many beliefs about Short Term Rentals, their visitors, owners and impacts. We have sought out information to determine what can be demonstrated with verifiable facts.

The first belief is that limiting, reducing or eliminating Short Term Rentals will impact affordability and housing availability.

We actually have a growing number of full time residents. In 2001 46% of homes had full time residents[[4]](#endnote-5). By 2016 it was 51%[[5]](#endnote-6) and in 2021 it grew to 58%.[[6]](#endnote-7) Dwellings with full time residents grew by nearly a third between 2016 and 2021, while dwellings grew only 1%.

Based on real estate sales data[[7]](#endnote-8), in the last 5 years 88% of the nearly 90 properties sold on Hornby are either owner occupied of have become Long Term Rentals~~.~~

So since STRs began in 2011, the number of dwellings on Hornby with full time residents has grown, it cannot be said that Short Term Rentals are pushing islanders out of full time residences.

In two separate surveys of Short Term Rental owners, in 2019 and again this year, 3 in 4 would leave their properties vacant more of the year if they did not have Short Term Rentals[[8]](#endnote-9). Nearly all the rest would be forced to sell.

This demonstrates that removing Short Term Rental from the bylaws will not add to long term housing or improve housing affordability on Hornby. These facts remove one significant driver of the thinking behind APC the recommendations.

The next belief that drives the recommendations is that Short Term Rental owners are no longer long term members of our community, that they are investors and not an ‘older woman’ using Short Term Rental a few weeks of the year to keep and maintain her property.

Today, 36% of Short Term Rental owners[[9]](#endnote-10) have been part of Hornby’s community for 30 or more years, 90%[[10]](#endnote-11), have been part of our community for more than 5 years. 72% rent for 12 or fewer weeks over the 5 month season[[11]](#endnote-12), and most live on their properties full time or part time throughout the year[[12]](#endnote-13).

95% say they have a Short Term Rental so they can pay their property taxes, 82% to support local stores and business[[13]](#endnote-14). Only 7% of Short Term Rental owners on Hornby describe themselves as income investors[[14]](#endnote-15), very different from the estimated 47% of Vancouver condo owners[[15]](#endnote-16)

The profile of the Hornby Short Term Rental owner, is **still** a member of our community who uses their Short Term Rental to keep and maintain their home.

The APC recommendations make an assertion that Short Term Rentals have an oversized impact on the ecosystem, sustainability, water and septic challenges on the Island.

With more than 200 camping a glamping sites[[16]](#endnote-17) turning over twice or more in a week, 5 resorts, B and Bs and about 1,000[[17]](#endnote-18) full and part time home owners hosting family and friends, the water, environmental and septic issues cannot be solely or even mostly the creation of only 9%[[18]](#endnote-19) of the visitor locations, the only grouping with guest turnover restrictions.

4 in 5 Short Term Rentals have monitored and enforced capacity limits of 8 or less[[19]](#endnote-20). That means they contribute less than 20%[[20]](#endnote-21) of the estimated 6,000 visitors each week.

3 in 5 Short Term Rentals have rainwater or cistern water systems[[21]](#endnote-22), 3 in 4 never need to buy water during the season[[22]](#endnote-23) and 100% have water conservation instructions in their visitor guides. 9 in 10 have serviced their septic systems in the last 5 years. 97% of Short Term Rentals have garbage compost and recycling rules[[23]](#endnote-24) and many ask visitors take laundry, garbage and recycling off the island.

Short Term Rentals are demonstrably and proactively managing sustainability, water, septic and environmental issues for our Island.

The Temporary Use Permit, is introduced, in the absence of Business Licences, to effect a count of Short Term Rentals.

The Province announced in June[[24]](#endnote-25) that it is building a registry that will create the desired count. While the APC could not have known this was in development, it does remove the need for a redundant count process or structure. We do urge that Hornby community members participate in the provinces work.

The proposed conditions for the TUP add nothing not already included in the Official Community Plan[[25]](#endnote-26).

The TUP, designed for out of the ordinary and short term property uses, is a heavily administrative, multi-step process that, used for this purpose, creates a substantially increased administrative burden on the Island Trust staff, the Local Trust Committee and our community.

The TUP is too unwieldy a tool to use to count Short Term Rentals

A further rationale for the TUP suggests that Short Term Rentals are contravening the Official Community Plan bylaws, some believe at a growing rate such that bylaw officers cannot keep abreast of them.

In 2020, the year HISTRA launched, when proactive Short Term Rental bylaw enforcement (BEN) also began there were 17 proactive files opened and 6 community complaints. In 2021 there were 2 complaints and 6 proactive files created. So far in 2022 not one Short Term Rental bylaw complaint or proactive file has been made or opened. The Islands Trust states ‘complaints about specific Short Term Rentals are infrequent’. Since 2017, no Short Term Rental on Hornby has been fined or penalized for non-compliance with the Bylaws.[[26]](#endnote-27)

Our Short Term Rentals are willingly following the rules, the imposition of the TUP will not make them more willing.

Decreasing the rental time frame by 2 months to June through August is recommended as a way to impact housing affordability, long term housing availability and reduce visitor pressure on the island

Obviously, this will not change things when tourism is highest, in July and August,

but it could cut $1.2M[[27]](#endnote-28) **a year** of direct spending from Island businesses, Artisans, trades and other workers.

We have already demonstrated that Short Term Rental owners will not move their properties to Long Term Rental.

Also consider the impact on our islands workers and businesses. Nearly all Short Term Rental visitors spend their estimated $130[[28]](#endnote-29) each day with sit down restaurants, takeout food stalls, local shops, local artists and the farmers market[[29]](#endnote-30). Just the visitors staying in the 125[[30]](#endnote-31) Short Term Rentals will spend an estimated $1.8-2.5M between May and September this year, not including accommodations. Of this $700K to $1M is estimated to be spent in May and September. Adding another half million in the off season, Short Term Rental owners use their earnings to purchase services and goods from other Hornby residents[[31]](#endnote-32).

We cannot support a recommendation that so obviously damages our island and cannot accomplish its intention.

HISTRA was formed because the Official Community Plan recommended it. 2 and 1/2 years later HISTRA has 100 members, up 33% since January.

We believe we have enhanced the positive contribution of Short Term Rentals in our community.

We have created easy to adapt frameworks for Short Term Rentals that support the conditions for operation expected in the Official Community Plan. We enable ecologically sensitive management, considerate visitor behaviours and a lens of community character and conservation for Short Term Rentals to incorporate[[32]](#endnote-33). This has been achieved with connection, understanding and constructive leadership.

Based on the verifiable information we have cited and sourced, we the Board, our 100 members, and the 25 Hornby Residents who have, so far supported or endorsed our request[[33]](#endnote-34), again ask that the 14[[34]](#endnote-35),[[35]](#endnote-36) APC recommendations, not borne out by facts, be removed from and help reduce the cost of[[36]](#endnote-37) any further work on the Official Community Plan update. .

We respectfully submit that HISTRA has and can, collectively with our community and the Local Trust Committee, create and expand voluntary frameworks and protocols that reflect and protect Hornby and its unique values, while including and supporting our Short Term Rental community members, both owners and visitors.

Thank you for your attention, these speaking notes with all of the sourced data have been submitted to the Local Trust Committee for the minutes of this meeting. We look forward to your action and are happy to answer any questions you might have.

1. Source: HISTRA Visitors Survey 2022. The survey is still open, but we have a representative number of responses and in reviewing past surveys (2021 Ferry user Exit Survey) there is face validity/similar outcomes on common questions. [↑](#endnote-ref-2)
2. Source: HISTRA Visitors Survey 2022 [↑](#endnote-ref-3)
3. Source: HISTRA Visitors Survey 2022 [↑](#endnote-ref-4)
4. Source 2003 Hornby Island Quality of Life Report page 13; 492 Year round households, 786 part time households (less estimated 200 resorts and campsites) = 1,078 Dwellings

492/1078 =46% [↑](#endnote-ref-5)
5. Canadian Census Data 2016 (1104 Dwellings, 560 lived in by Full time Residents) [↑](#endnote-ref-6)
6. Canadian Census Data 2021 (1117 Dwellings, 667 lived in by Full time Residents) [↑](#endnote-ref-7)
7. Count of all Sales 2017 to 2022 and current usage, provided by Royal LaPage Realty [↑](#endnote-ref-8)
8. Source: HISTRA Owners Survey 2022, HISTRA Owners Survey 2019 The survey is still open, but we have a representative number of responses and in comparing the 2019 Owners survey, there is face validity/similar outcomes on common questions. [↑](#endnote-ref-9)
9. Source: HISTRA Owners Survey 2022, percentage aligns with the same question in HISTRA Owners Survey 2019 [↑](#endnote-ref-10)
10. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-11)
11. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-12)
12. Source: HISTRA Owners Survey 2022, 58% [↑](#endnote-ref-13)
13. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-14)
14. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-15)
15. Source: City Space Podcast - on the Decibel, Friday September 2, 2022 [↑](#endnote-ref-16)
16. Camping and Glamping Sites: Tribune Bay 135, Brads Dads Land 40, Fords Cove 15, Fossil Beach 7, Lorena Winery 9 Tribune Bay Outdoor Education Center 11=217 [↑](#endnote-ref-17)
17. 1117 total dwellings (2021 census data,125 STRs (per estimate above and APC Report), 1117-125=992 [↑](#endnote-ref-18)
18. 1117 dwellings +216 camping and glamping sites+5 resorts and B and Bs=1,338 visitor locations. 125/1338 = 9% [↑](#endnote-ref-19)
19. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-20)
20. 125 Short Term Rentals multiplied by 8 = 1,000 visitors each week (Short term rentals can only host one group each week, per the bylaws, 1000/6000= 17% Even at 167, the percentage is only 22%. [↑](#endnote-ref-21)
21. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-22)
22. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-23)
23. Source: HISTRA Owners Survey 2022 [↑](#endnote-ref-24)
24. Vancouver Sun June 11, 2022 [↑](#endnote-ref-25)
25. OCP 2014 Consolidated Version June 2022, Page 70 [↑](#endnote-ref-26)
26. Complaint and Proactive enforcement data from emails from Warren Dingman August 30, 2022 and September 2, 2022 [↑](#endnote-ref-27)
27. Source: Go2HR (https://www.go2hr.ca/about-us/quick-facts-about-bcs-tourism-industry) and Destination BC. Vancouver Island Regional Tourism Profile 2017

In BC in 2017, $9B was spent by 5.7M overnight and an estimated 7.7M day visitors (57% of visitors to BC are day visitors), $6.8B of which was spent on goods and services other than accommodation. That equates to an estimate of $507 per visitor. As there are fewer services on Hornby, we have estimated daily spending at $130 (also the stated average spending in HISTRA Visitors Survey 2022) per STR (not per person) per day. We used 116 days in the summer and shoulder seasons, and a range of 167 and 125 STRs operating on each day.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Days | 72 | 44 |  | 116 | Daily Spend |
| STR | 125 |  $1,170,000  |  $715,000  |  |  $1,885,000  |  $130  |
|  | 167 |  $1,563,120  |  $955,240  |  |  $2,518,360  |  |

and HISTRA Owners Survey 2022, Hornby services and workers Annual Spending Estimate $4,000 per year per each of 125 STRs. Please note this data has been updated to reflect new information in the 2022 HISTRA Visitors Survey [↑](#endnote-ref-28)
28. HISTRA Visitors Survey 2022, Average estimated daily Visitor spending $130 [↑](#endnote-ref-29)
29. HISTRA Visitors Survey 2022 [↑](#endnote-ref-30)
30. Count on September 3, 2022: Hornby Island Accommodations (66) Wind and Waves (20) My Hornby Stay (12) VRBO (4) and AirBnB (26) adjusted by 5% for overlap between platforms =122 [↑](#endnote-ref-31)
31. HISTRA Owners Survey 2022, On Hornby Annual Spending Estimate $4,000 per year per 125 STRs [↑](#endnote-ref-32)
32. HISTRA.ca/modeling-best-practices [↑](#endnote-ref-33)
33. The request is included in the HISTRA letter submitted to LTC August 24, 2022 [↑](#endnote-ref-34)
34. List of Recommendations we request be removed:

	* 1. Density Recommendation 2
		2. Density Recommendation 3
		3. Temporary Use Permit Recommendation 1
		4. Temporary Use Permit Recommendation 2
		5. Temporary Use Permit Recommendation 3
		6. Short Term Rental Recommendation 1
		7. Short Term Rental Recommendation 3
		8. Short Term Rental Recommendation 4
		9. Short Term Rental Recommendation 5
		10. Short Term Rental Recommendation 7
		11. Short Term Rental Recommendation 9
		12. Short Term Rental Recommendation 11
		13. Zoning Recommendation 1
		14. Zoning Recommendation 2 [↑](#endnote-ref-35)
35. A further 5 have too little information to determine the impact and so we believe they cannot be pursued as written and ask they also be removed, the total number of recommendations we and the many others who signed our letter do not agree with is 19.

	1. Definition 2
	2. Definition 3
	3. Definition 4
	4. Advocacy Recommendation 1, part 2
	5. Advocacy Recommendation 2 [↑](#endnote-ref-36)
36. The LTC determined in June that the original $15K for the OCP revision currently underway would need to double to $30K in light of the growing reaction to the recommendations we are requesting be removed. Removing these recommendations could allow the OCP revision to proceed and conclude inside its original $15K budget. [↑](#endnote-ref-37)