From:	Dan Bruiger
Sent:	Thursday, June 2, 2022 3:20 PM
То:	northinfo
Subject:	comments on HI APC housing recommendations
Hello,	
I would like to submit these comments for consideration at the upcoming Local Trust Committee meeting on Hornby Island on June 10.	
meeting on Horney Island on a	valle 10.
sincerely,	
Dan Bruiger	
Hornby Island BC	
-	
Dear Trustees,	APC members, and all concerned,

Please find below some comments on the APC recommendations, offered in a constructive spirt.

Comments on "Housing and Short-term Rentals: Recommendations from Hornby Island Advisory Planning Commission, March 29, 2022"

As mentioned on page 2, increased density will not automatically lead to affordable housing. However, without reassigning use of existing buildings, increasing affordable housing *will* inevitably increase density. "Reducing available land by putting up more houses" will not necessarily "lead to less sustainable food production." Only cleared land can be used for food production

(because of the sunlight needed), whereas treed land *can* be used for housing.

On page 3, the "rationale" proposed for limiting STR is neither "simple" nor straightforward. What is proposed is to increase IT control over land use by substituting TUP for blanket permission currently accorded by zone. That may be a good idea, but it would be more honest to describe it that way. Of course, that substitution would put the individual STR at the perpetual mercy of IT, making it harder for owners to plan ahead.

It should be noted that STR is a separate issue from densification per se, though not a separate issue from affordable housing. Any new unit built expressly for the purpose of STR should have been approved with regard to zoning and density regulations in the first place. Restricting STR will not necessarily see such units converted to long-term housing unless positive incentives are put in place as well as negative ones. Restricting STR may (or may not) be a necessary condition to solve the housing crisis; but it is hardly a sufficient condition. IT could go much further to specifically encourage affordable year-round housing, and should take care not to inadvertently discourage it through regulation and policy that instead targets STR.

On page 4, Recommendation #8 ("Require all platforms to list only those properties in compliance") might not be legally feasible.

On page 6, Definition #1 presumably refers to the OCP, but the language does not correspond. Specifically, there is no mention in the OCP of housing types ("mobile homes, tiny homes, caravans, yurts") in the definition of Community Housing. Moreover, Section 6.3.5.14 of OCP seems already to provide, at least by implication, for a temporary seasonal work force. If the proposal is to change the wording of the OCP, these changes could be spelled out more explicitly.

Respectfully submitted by Dan Bruiger, June 1, 2022