

February 27, 2025

To: Hornby Island Local Trust Committee

Dear Trustees

The HICEEC Board of Directors writes to express our concerns about the possible designation of the Sandpiper and Galleon Beach subdivisions as Highly Developed High Vulnerability Aquifer (IA) zones. We consider the IA designation an outdated concept and a blunt tool regarding sustainability of water resources that would create very serious barriers to creating affordable year-round rental housing and maintaining housing for current homeowners.

We believe that the IA proposal reflects ignorance of local housing realities and questionable assumptions about local hydrology, and that its implementation would not only worsen the housing crisis on Hornby but, ironically, prevent investment in environmentally beneficial improvements. Consequently, we wish to add our voice in support of recommendations to suspend adoption of this measure.

First, there's the issue of density. The Hornby Island Community Profile shows that the average household size on Hornby is 1.9 persons, well below the 2.2 persons in the Comox Valley as a whole, and 2.4 persons in BC and Canada. Of the 655 residential properties, 285 or 43% were occupied by a single person. These units were built as single-family houses, assuming 4-6 people would occupy them—and thus assuming much higher water use.

Second, our population is older: 44% over 65 years on Hornby, compared to 28% Comox Valley; 20% BC; 19% Canada. We have many elderly islanders, living alone in aging housing, who would benefit from having a secondary suite for year-round tenants. The suites could house a caregiver or be rented to generate revenue to supplement often meager income from pensions.

Unfortunately, the IA designation, if applied to all properties in these areas, would preclude the possibility of a secondary suite as proposed with provisions in Bylaw 3.7(4). We believe further research is needed to identify areas of significant concern and fine-tune use of the designation, with consideration of water conservation technologies. We encourage including these areas under Bylaw 3.7(4), with careful permitting of secondary suites that use market solutions to meet housing needs while maintaining environmental standards. This would increase the housing supply without requiring land clearing, road building, and other infrastructure needs.

Another important issue is that many of the houses in these areas are in poor repair. As Hornby was exempt from building codes, homes often were constructed without perimeter foundations. Many houses have outdated electrical panels and wiring, single-pane windows, inadequate insulation, and unsafe stairs and decks; they need upgrades for safety and

accessibility. These deficiencies may make the property ineligible for insurance, which is required for loans and mortgages.

Many long-term Hornby owners who purchased their home decades ago on the limited incomes possible on the island now find themselves “wealthy” on paper, due to the escalation of property values in recent years, but unable to access that wealth in the form of loans or lines of credit to upgrade their homes, as their incomes are insufficient to meet repayment. A secondary suite could generate income to fund upgrades and meet repayment thresholds—but our credit union and other banks will not provide that financing unless this is a legally permitted use. Thus, not only is a property capable of housing 2-3 additional people unable to meet urgent housing needs, but the current owner-occupants struggle to maintain their own use of the home. Keeping people who are housed able to stay and age-in-place may be as significant as creating good year-round rental possibilities for young islanders.

Finally, it is an open secret that many secondary suites within homes, separate structures, and tiny homes already exist. Having a process to obtain legal permission for these would, as above, allow the owner to obtain insurance and funds for upgrades and ensure that existing buildings do meet the necessary standards.

We support Bylaw provisions that do not create barriers, but instead empower applications that can be considered, approved if appropriate, and monitored on a case-by-case basis. The approval criteria should include meeting clear guidelines for water and septic systems. The guidelines should endorse current and innovative practices in water catchment and storage, grey-water systems, and composting toilet options, and ensure compliance with methods that can be supported on specific lots. Alternatives for permitting that are clear but not onerous, supported by agreements for year-round, affordable rental, with enforcement through regular renewals and checks, would be desirable. We believe there is strong community support for creating housing solutions for owners and year-round local tenants that use the existing stock and infrastructure in ways that do not increase the impact beyond what would be expected with a single-family house.

The Suitable Land Analysis, which was presented recently, seems promising as a planning tool for sustainable development. But it is in early stages and will need refinement and nuanced consideration of the specific situations of each island before it can be applied with any confidence. At present it makes assumptions regarding the significance of identified indicators that ignore variations in underlying geology and current land use. For example, proximity to shore might be an indicator of likelihood of salt-water intrusion along the sandy banks of Whaling Station or Gabriola, but not in the bedrock underlying Sandpiper. The density of wells is an important indicator of water supply in areas with subsurface aquifers, but not in areas with deep rock fissures, such as we have on much of Hornby. Finally, the SLA needs to take into

account the effect of water collection, storage, and disposal methods that are not based on well and ground water use. We look forward to discussions about the refinements needed for our specific circumstances.

In summary, we encourage you to suspend implementation of the blanket IA designation in Sandpiper and Galleon Beach and develop flexible and innovative language, based on further development of the Suitable Lands framework and hydrological mapping, to update our zoning to reflect our existing community structure and make both environmental protection and housing solutions work together. This is possible – let's make it so.

Many thanks for your work on these challenging issues and for working hard with advisors, professionals, and community members to make the OCP and Bylaws reflect the very best solutions for a sustainable, thriving Hornby Island.

Regards,

John Heinegg
HICEEC Chair
www.hiceec.org