

**From:** S McDonnell [REDACTED]  
**Sent:** Monday, May 12, 2025 10:30 AM  
**To:** Grant Scott; Alex Allen; Timothy Peterson  
**Cc:** Sonja Zupanec; northinfo  
**Subject:** Letter from HICEEC re Hornby accessory dwellings  
**Attachments:** IA designation letter.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please find attached a letter that was drafted and approved to be sent by HICEEC for inclusion in the March meeting agenda. It does not appear to have been sent. So I am sending it for your information as a personal communication while the HICEEC board determines what happened in the process.

I plan to attend the meeting Friday and will speak to it if the opportunity presents. I know this is not in the formal process, but provide it for background information. I understand that consideration of the bylaw provisions pertaining to secondary dwellings is paused, pending consultation with KFN. The issue of water licenses for commercial use is also undergoing review and delays at the provincial level because of issues relating to indigenous access. I suggest that many factors apply equally to short-term vacation rental use. For those that are not in primary residences as quasi-home occupations, they are clearly full commercial uses and should have water license- requirements and be subject to other KFN concerns re density, alienation of land etc.

I am not suggesting that the STVR consideration process be paused as it is time to wrap up this process with some clear rules, caps and enforcement. But following bylaw changes to something clear, I think TUPS or other permits for non-primary STVRs should not be considered until the issues impacting accessory suites for year-round are also resolved.

thanks for all your work.

Sheila

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*I gratefully acknowledge that I reside on the traditional unceded territory of the K'omoks First Nation, the Eitsen, Pentlach, Sasitla and Sahtloot peoples*

HICEEC

January 19, 2025

Hornby Island Local Trust Committee

Dear Trustees

The Board of Directors of the HI Community Economic Enhancement Corp is writing to express our concerns about the possible designation of the Sandpiper and Galleon Beach subdivisions as Highly Developed High Vulnerability Aquifer (IA) zones. This designation, if applied to all properties in these areas, would preclude the possibility of allowing a secondary suite as proposed with provisions in Bylaw 3.7(4). We wish to add our voice in support of recommendations to suspend adoption of that measure. We believe further research is needed to identify areas of significant concern and fine-tune (ground truth) use of the designation, to understand the conservation and water-smart measures such as cisterns, approved composting toilets and grey-water systems. We encourage including these areas under Bylaw 3.7(4) and empower careful permitting of secondary suites that use market solutions to meet housing needs while maintaining environmental standards.

Hornby Island faces many very significant challenges. At the top of the list are protection of the environment in these times of climate change and the urgent need for affordable year-round housing for residents. We are concerned that the IA designation is an outdated concept and blunt tool regarding sustainability of our water resources and will create very serious barriers creating affordable year-round rental housing and maintaining housing for existing homeowners.

There are many advantages to using secondary suites on existing residential properties to address a sector of our year-round housing needs. Hornby's non-profit, subsidy and grant funded projects, the Elder Village and Beulah Creek project, help address the problems but have taken enormous efforts and should rightly be aimed to support low-income, non-home-owning residents. Permitting secondary suites on half-acres in the two subdivisions is a smart, market-based solution that uses existing infrastructure and density for absorb and support additional units without moreland clearing, road building and other infrastructure needs.

The Hornby Island Community Profile shows that the average Household size on Hornby is 1.9 person, well below the 2.2 person in the Comox Valley as a whole, and 2.4 persons in BC and Canada. We see that 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 when built in past decades. Our population is also older – 44% over 65 years on Hornby, compared to 28% Comox Valley; 20% BC; 19% Canada. We have many older islanders, living alone in aging housing, that would benefit from having a secondary suite for year-round tenants. These include being able to have company near at hand while maintaining privacy, to house a caregiver, and generate additional revenue to supplement often meager income from pensions and other subsidies.

There are other benefits to having secondary suites in the two subdivisions. Many houses are in poor repair. As Hornby was exempt from building code, homes often do not have perimeter foundations. Houses have outdated electrical panels and wiring, single-pane windows, lack of wall and floor insulation, unsafe stairs and decks and need upgrades for safety and accessibility of the occupants. Many cannot obtain insurance, which is required for loans and mortgages. Long-term Hornby owners, who purchased their home many years 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 own homes without sufficient incomes to meet repayment. Secondary suites would be good investments that would generate income to upgrade their quarters and meet repayment thresholds but which our credit union and other banks would not undertake 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.

We also know that many secondary suites within homes, separate structures and tiny homes already exist. It is our position that offering a process to obtain legal permission for these dwellings would be a good step. This would, as above, allow the owner to obtain insurance and funds for upgrades such as water conservation, capture, cisterns and disposal and ensure the existing buildings do meet the necessary standards. At present, as most operate “below the radar”, short cuts and potentially harmful practices are not identified and remedied.

We support Bylaw provisions that do not create barriers, but empower applications to be considered, approved and monitored on a case-by-case basis. The approvals should include meeting clear guidelines for water and septic requirements, including current and innovative practices in water catchment and storage, separate grey-water and composting toilet options, but ensuring 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 and enforcement through regular renewals and checks would be desirable. We believe that there is a high degree of community support for creating housing solutions for owners and year-round local resident tenants using the existing stock and infrastructure in ways that do not increase the impact from what would be the normally expected use of a single-family house.

**The development of the Suitable Land Analysis 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. For instance, assumptions are made regarding the significance of identified indicators. The variations in underlying geology and in current land-use will be important considerations in applying the tool. Proximity to shore might be an indicator of likelihood of salt-water intrusion along the sandy banks of Whaling Station or Gabriola for instance, but not in the bedrock underlying Sandpiper. Subsurface aquifers could be heavily impacted and at risk from density of wells, but in areas with deep rock fissures rather than groundwater, such as we have on much of Hornby, water supply is impacted by well proximity very differently. The assumptions behind these factors would need to be evaluated to consider current methods of water collection, storage and disposal not based on well and ground water use. We look forward to discussions about the**

**refinements needed for our specific circumstances and feel the IA designation cannot at this point be applied with any confidence.**

Our community demographics, in age and family make-up, have changed significantly and the single-family per half acre model no longer works for a significant portion of our population. 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.

Sincerely,

HICEEC