
From: jodschick [REDACTED]
Sent: July 14, 2020 11:49 AM
To: Clerk <Clerk@gibsons.ca>
Subject: Public Hearing comment

Hello,

Below are the comment for Sa Boothroyd and Jody Schick who reside at [REDACTED] Gower Point Road, Gibsons.

OCP Amendment for Secondary Suites

We do not support this amendment. Specifically, we are opposed to the “Note 2: For the purpose of calculating density, Secondary Suites and Lock-Off Suites do not count towards units per hectare or units per acre.” Our view is that density calculations should include Secondary and Lock-off suites.

Zoning Bylaw Amendment for Secondary Suites

We support all aspects of this amendment with the exception of limiting the number of secondary suites to one per dwelling, duplex or townhouse. We would rather see the number of units based on total building area, number of bedrooms or lot coverage.

Short Term Rental Bylaw

BYLAW NO. 1065-47

We are opposed to this bylaw and specifically Section 8.7.

Short term rentals (STR) should not be allowed in garden suites, secondary suits or Lock-off unites for the following reasons:

1. Reduced rental availability - Gibsons has a severe shortage of rentals. Allowing STR in these unit types will further reduce the rental stock and increase prices. Gibsons is spending considerable funds on increasing the affordable rental stock, including donating \$1.6 million in land and several road ROW in the name of improving rental housing options. This STR bylaw will undo any benefit of this. We are perplexed and troubled by a bylaw that will so severely impact the rental stock. As long as the TOG and its residents are contributing to expansion of affordable housing, no new STR permits for units capable of long term rental should be allowed in any residential zone period. We have a housing shortage and while there may be some question to how much STRs contribute to this (there is mounting evidence that it increases rental costs and lowers availability) there is no questions that it does not help.

2. There has been no comprehensive analysis of the implications of this bylaw on the rental stock. This type of analysis is key to understanding the trade-offs of different bylaw options.
3. The bylaw does not include any mechanism to assess whether neighbours of a STR applicant support this activity even though most non-STR operators who participated in the survey were in favour of more restrictions. A glaring omission in the survey is that it didn't ask whether respondents support STR in general and whether they would support a neighbour having one.
4. Allowing STR in garden suites will commercialize the Garden Suite Zone, counter to its intent when this zone was approved by area residents. Council has to look now further than their own website for a reminder of why this zone was created: "Why Garden Suites? Garden Suites use existing infrastructure, providing a sustainable and economical way to increase and diversify the rental housing stock. They provide housing for a variety of people, including those who would like to downsize, relatives of homeowners, aging parents and renters who would like a detached dwelling rather than a condo or basement suite. Rental income also provides a "mortgage helper" for homeowners." The intent of Garden Suites was and is clearly to increase housing options, no introduce short term tourist accommodations to Gibsons' back yards. We are aware that it is possible to interpret the Garden Suit zoning as allowing STR but only by interpreting "renter" as including STR and by taking the lack of wording that STR's are prohibited as an indication that they are acceptable. However, that is very different than following the intent or spirit of the bylaw.
5. The argument put forth by STR operators that long term rentals are financially inviable and a hardship is a poor argument for allowing STR. Given the low vacancy rate for rentals, it is very much in their ability to screen for renters that meet their criteria. It isn't surprising that STR operators resist limits that threaten their decision to chose STR or long term rental given the increased revenue and fewer challenges. Giving them this option to opt out of long term rentals is at the cost of neighbourhood cohesion, availability and cost of rentals and in the end the cost to Gibsons taxpayers in direct and indirect costs to increase affordable housing.
6. We doubt that our bylaw staff have the capacity to adequately enforce any of the bylaws related to STR. The complaint driven process pits neighbours against each other by requiring residents to notify the town of most infractions. And, considering that most noise complaints occur after working hours, there is unlikely that the bylaw officer will rectify a situation while it is happening.
7. The financial benefit to the TOG may be minimal or even negative. The staff report give no indication whether the \$200 business licence will bring a meaningful benefit to the TOG once administrative costs and bylaw enforcement costs have are considered.
8. The present bylaw will provide no incentive for hotel and motels to invest in their operations if the market has been diluted by the abundance of STR.

Sincerely,

Sa Boothroyd and Jody Schick
█ Gower Point rd.
Gibsons, BC

Further information on the impact of STR.

Economic Policy Institute

<https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-no-reason-for-local-policymakers-to-let-airbnb-bypass-tax-or-regulatory-obligations/>

Harvard Business Review

<https://hbr.org/2019/04/research-when-airbnb-listings-in-a-city-increase-so-do-rent-prices>

Forthcoming in the *Canadian Journal of Urban Research*

<https://upgo.lab.mcgill.ca/publication/short-term-rentals-in-canada/short-term-rentals-in-canada.pdf>