



**Penticton Indian Band**  
Natural Resources Department  
841 Westhills Drive | Penticton, B.C.  
V2A 0E8  
Referrals@pib.ca | www.pib.ca  
Telephone: 250-492-0411  
Fax: 250-493-2882

L-250203

X2024.017-ZONE

Short Term Rental Accommodations - Electoral Areas D, F & I.

Regional District of Okanagan Similkameen

4-Feb-2025 14:02 PST

WITHOUT PREJUDICE

Attention: Evelyn Reichert

RE: 40 (forty) day extension

Thank you for the above application that was received on 3-Feb-2025.

This letter is to inform you that due to current levels of internal capacity, we are unable to review your referral in your proposed timeline. With additional time, snpink'tn (Penticton Indian Band) will be able to ensure that an informed review process will occur. We are setting the new timeline to be 40 days from the existing timeline.

syilx (Okanagan Nation) Title includes snpink'tn right to proactively use and manage our resources. In Tsilhqot'in, the Supreme Court of Canada emphasizes the need to seek the consent of the title-holding Aboriginal group, and warns, without consent for a project, the proponent risks having the project cancelled. The obligation to seek free, prior and informed consent is further required by the United Nations Declaration on the Rights of Indigenous People (UNDRIP). UNDRIP requires that Indigenous peoples shall be consulted and cooperated with in good faith in order to obtain their free and informed consent prior to the approval of



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any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

Please note that not receiving a response regarding a referral from snpink'tn in the pre-application, current or post-application stage does not imply our support for the project.

I appreciate your co-operation.

limlæmt,

Maryssa Bonneau  
Referrals Coordinator  
snpink'tn (Penticton Indian Band)  
Natural Resources  
email: [mbonneau@pib.ca](mailto:mbonneau@pib.ca)  
office: 250-492-0411  
cell: 250-486-3241  
address: 841 Westhills Drive  
Penticton, British Columbia  
Canada V2A 0E8

**Lauri Feindell**

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**Subject:** FW: Referral - ZONE - STR Review Areas "A", "C" & "E" | File No. X2024.018-ZONE

**From:** Dennis Smith <[dsmith@rdos.bc.ca](mailto:dsmith@rdos.bc.ca)>

**Sent:** February 5, 2025 11:44 AM

**To:** Ben Kent <[bkent@rdos.bc.ca](mailto:bkent@rdos.bc.ca)>

**Subject:** Re: Referral - ZONE - STR Review Areas "A", "C" & "E" | File No. X2024.018-ZONE

Hi Ben,

This proposal does not affect our service.

Thanks for asking

Dennis Smith Fire Chief

Naramata Volunteer FD

[dsmith@rdos.bc.ca](mailto:dsmith@rdos.bc.ca)

250-462-5023

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**DEVELOPMENT SERVICES  
PRELIMINARY BYLAW  
COMMUNICATION**

Your File #: X2024.017-ZONE  
(3099 & 2800.50)  
eDAS File #: 2025-00586  
Date: February 6, 2025

Regional District Okanagan Similkameen  
101 Martin Street  
Penticton, BC V2A 5J9

Attention: Lauri Feindell, Planning Secretary

**Re: Proposed Bylaw 2800.50, 2025 for:  
Amendments to the Okanagan Valley Zoning Bylaw in relation to the  
regulation and permitting of short-term rental accommodations (e.g.  
"vacation rentals" and "bed and breakfast operations").**

Preliminary Approval is granted for the rezoning for one year pursuant to section  
52(3)(a) of the *Transportation Act*.

If you have any questions please feel free to call Penticton Development Services at  
(250) 712-3660.

Yours truly,

Rob Bitte  
Development Officer

**Local District Address**

Penticton Area Office  
102 Industrial Place  
Penticton, BC V2A 7C8  
Canada

Phone: (250) 712-3660 Fax: (250) 490-2231



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen

**FILE NO.:** X2024.018-ZONE

**FROM:** Name: Wade Jackson

Street Address: [REDACTED] Naramata, BC V0H 1N1

Date: February 6, 2025

**RE:** Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

- ☐ I do support the proposed amendments to the OCP bylaw.
- ☒ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

I live adjacent to a short-term rental which I have been quite vocal about in every in every OCP survey, and a few of these feedback forms. I would like to see businesses being run from commercial areas, not from a space that touches my backyard. The STR next to me uses a property manager that does not live in Naramata, and anytime I had issues I found it difficult to navigate. Issues have included short-term renters parking in my yard, they have parked on Arawana Road (where there is no shoulder), noise issues (day and night), litter, dog feces, harassment, trespassing, and stolen fruit from my trees. The main recourse for these businesses seems to be to not allow these tenants back, but by that time the damage is done. I am not at all compensated for my inconvenience, and when I move into a detached home in a suburban neighbourhood, I do not sign up for this kind of nuisance without having the able to work on neighborly issues constructively. I cannot fathom why any council would choose to approve STR use. It damages neighbourhood life, to the benefit of owners who do not know or care what happens here. Respectfully, I would encourage people looking to make supplemental income to do so in manors that do not directly affect people in their own homes.

Protecting your personal information is an obligation the Regional District of Okanagan-Similkameen takes seriously. Our practices have been designed to ensure compliance with the privacy provisions of the *Freedom of Information and Protection of Privacy Act* (British Columbia) ("FIPPA"). Any personal or proprietary information you provide to us is collected, used and disclosed in accordance with FIPPA. Should you have any questions about the collection, use or disclosure of this information please contact: Manager of Legislative Services, RDOS, 101 Martin Street, Penticton, BC V2A 5J9, 250-492-0237.

If STR approval is inevitable (and I truly hope it is not), I feel the enforcement of rules detailed in the draft documents to be inadequate. It is my belief that on-site live-in property managers are critical. Guest limits should not be more than 6 people.

I miss having the ability to build relations built on respect, shared history, and an appreciation of our community that came from co-habiting a neighbourhood with people that get up and go to work everyday, or spend their day in their garden next door.

Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting.

All representations, including names, will be made public if and when they are included in the Board Agenda.

**Lauri Feindell**

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**Subject:**

FW: Short term rentals/business license

-----Original Message-----

From: Jo-Ann Cooke [REDACTED]

Sent: February 7, 2025 10:04 AM

To: Planning <planning@rdos.bc.ca>

Subject: Short term rentals/business license

[Some people who received this message don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Hello, I live in Naramata, electoral district E. [REDACTED] Naramata V0H 1N1.

The Naramata Village does not need any more short term rentals or new rules for approving them. Please don't re-invent the wheel. Adopt the provincial rules. Don't spend any more time or money on this subject. Listen to your constituents!! Enough is enough!!

Thank you

Jo-Ann Cooke

Sent from my iPhone

## Lauri Feindell

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**From:** Lee Chanin [REDACTED]  
**Sent:** February 8, 2025 7:53 AM  
**To:** Planning  
**Cc:** Cindy Chanin  
**Subject:** Regulation of short-term rental accommodations in Electoral Areas A, C & E. Proposed Official Community Plan (OCP) amendments

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

[Some people who received this message don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Good morning,

I am unable to respond by mail to your feedback form so will email you with my reply and for it to be included in your responses to your RDOS OTC changes as they relate to the short term rental policy.

Name: Lee Chanin

Address: [REDACTED]

Date: 08 Feb 2025

My comments / concerns are:

No, I do not support the proposed amendments to the OTC bylaw.

My comments are;

1. The province has a STR policy that covers the issue quite well. I don't see a reason to modify the Provincial STR policy, the RDOS can adopt the provincial policy and leave well enough alone.
2. I believe the property owner needs to reside on the same property as the STR as this will deal with a great number of complaints prior to needing to involve the RDOS. The RDOS cannot implement a new bylaw without the necessary support and employees in place to respond to complaints as they occur and address complaints that will arise from the new policy.
3. The RDOS does not have the employees in place to deal with concerns/complaints as they arise, i.e, 24 hours/day. Should the RDOS, against the majority of taxpayers who live in Naramata, decide to implement these changes then who do they expect will respond at midnight or 2 am to noise complaints or and other minor complaints that arise from this policy change. It is completely irresponsible for the RDOS to implement these policies without any mechanism in place to address complaints that will arise from the these policy changes.
4. I believe the current RDOS STR policy is completely irresponsible for Naramata residents. We constantly get complaints about the noise and other issues which the RDOS is unable to deal with as there isn't anyone working. This proposed change will do nothing to address the current complaints and will only exacerbate the untenable issues currently facing Naramata residents.

Regards,



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen **FILE NO.:** X2024.018-ZONE

**FROM:** Name: Patti Lacis. \_\_\_\_\_  
(please print)

Street Address: \_\_\_\_\_ Naramata BC V0H 1N1. \_\_\_\_\_

Date: Feb 11, 2025 \_\_\_\_\_

**RE:** Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

- ☐ I do support the proposed amendments to the OCP bylaw.
- X ☒ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

Let's first of all remind ourselves that it took years to come up with this OCP, so any changes should be given due process. I have 4 main complaints with the new rules.

1. No where in any of these new changes is there a place in the process for neighbours to object! Land zoned residential is not allowed to have any commercial activity (eg STR), so that is why there are these bylaws to allow houses to be rented in places where they should not be. Primary permanent resident neighbours should have a say when their non-resident neighbours decide to make money from short term renting their homes (and it's a LOT of money) in a non commercial area. People buying homes and living in residential neighbourhoods are suppose to be protected from commercial land use in residentially zoned areas. Permanent resident home owners renting their suites out are NOT the problem. Non-resident home owners who short term rent their homes to too many people and are not around to see what is going on creates problems. "On-site" home managers (should be called In-Area home managers because they are NOT on-site) don't really know what's happening either - but they are around to take care of problems that arise like clean up the garbage that the renters put out at the wrong time and the bears got into. Often the neighbours have already done that before any property manager gets there. However, they are unable to address any problems in real time.

Protecting your personal information is an obligation the Regional District of Okanagan-Similkameen takes seriously. Our practices have been designed to ensure compliance with the privacy provisions of the Freedom of Information and Protection of Privacy Act (British Columbia) ("FIPPA"). Any personal or proprietary information you provide to us is collected, used and disclosed in accordance with FIPPA. Should you have any questions about the collection, use or disclosure of this information please contact: Manager of Legislative Services, RDOS, 101 Martin Street, Penticton, BC V2A 5J9, 250-492-0237.

2. If we are going to allow STR (and the neighbours have agreed) then we need to limit the number of people to 6 (NOT 8 which is suggested in these changes) 8 allows for 2 families of 4, whom I'm sure will have a great time, but will undoubtedly be noisier than 6. Seems like a fair compromise. Penticton put in a limit of 6 people in their STR in 2011. Why has it taken Naramata so long to be fair? Any more than 6 is a party!

3. Enforcement of the rules. If you say 8 people, renters will bring 10 or 12 (and remember there is no one on-site to check, and property managers won't report this anyway - they would lose their job managing the property). If you have a noise complaint and call it in, no one is available to come at midnight and so the complaints are never followed up on in person, and almost impossible to enforce and nothing is done. RDOS will tell you that they are short staffed. Even dog complaints (which we had at least 5 in our neighbourhood last year) never saw a human attend to the complaint. And interestingly enough, complaints aren't carried over from one year to the next so there is no history.

4. Naramata will continue to lose permanent residents to investors, which will deplete our community of human resources and our ability to provide a range of enriching activities for our citizens - young and old (recent news of RDOS pulling funding from children's program prime example) Non-resident owners also take housing away from people who would love to live here full time.

I keep thinking of that saying,  
You come from away because you like it here  
And then you want to turn here into there!

I do NOT want to turn here into there. I moved here 10 years ago because I like the way it feels here, I like the neighbourly feeling of walking the KVR and seeing friends, I like the quiet of being out in nature and being able to sit in my backyard enjoying this beautiful place in relative peace and quiet. I think all permanent residents deserve that! Why should people who don't even live here get to do things that directly negatively affect those of us who do live here? It's really not fair!

And it's not too late for our RDOS elected representative to opt into the new STR provincial rules, which address a lot of these issues and provides provincial enforcement.

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**Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting.  
All representations, including names, will be made public if and when they are included in the Board Agenda.**



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Telephone: 250-492-0411  
Fax: 250-493-2882

L-250213

:

X2024.018-ZONE

L-250213-Short Term Rental Accommodations - Electoral Areas A, C & E.

Regional District of Okanagan Similkameen

13-Feb-2025 11:23 PST

WITHOUT PREJUDICE

Attention: Evelyn Reichert

RE: 40 (forty) day extension

Thank you for the above application that was received on 4-Feb-2025.

This letter is to inform you that due to current levels of internal capacity, we are unable to review your referral in your proposed timeline. With additional time, snpink'tn (Penticton Indian Band) will be able to ensure that an informed review process will occur. We are setting the new timeline to be 40 days from the existing timeline.

syilx (Okanagan Nation) Title includes snpink'tn right to proactively use and manage our resources. In Tsilhqot'in, the Supreme Court of Canada emphasizes the need to seek the consent of the title-holding Aboriginal group, and warns, without consent for a project, the proponent risks having the project cancelled. The obligation to seek free, prior and informed consent is further required by the United Nations Declaration on the Rights of Indigenous People (UNDRIP). UNDRIP requires that Indigenous peoples shall be consulted and cooperated with in good faith in order to obtain their free and informed consent prior to the approval of



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any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

Please note that not receiving a response regarding a referral from snpink'tn in the pre-application, current or post-application stage does not imply our support for the project.

I appreciate your co-operation.

limlæmt,

Maryssa Bonneau  
Referrals Coordinator  
snpink'tn (Penticton Indian Band)  
Natural Resources  
email: mbonneau@pib.ca  
office: 250-492-0411  
cell: 250-486-3241  
address: 841 Westhills Drive  
Penticton, British Columbia  
Canada V2A 0E8

# Feedback Form

## Regional District of Okanagan-Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

TO: Regional District of Okanagan-Similkameen FILE NO.: X2024.018-ZONE

FROM: Name: Bruce Brownstein (please print)

Street Address: [REDACTED] Oliver, BC, V0H 1T5 - Area C

Date: February 14, 2025

RE: Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

I do support the proposed amendments to the OCP bylaw.

I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

RE: BYLAW NO. 3050.05

With respect to Short Term Rentals and the fees to register, I do not agree with the amounts proposed. That is an outrageous amount to charge every resident proposing to have a short term rental. More consideration should be given to exclude larger properties and RA zoning where the likelihood of a short term rental displacing a long term rental is less.

Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting.  
All representations, including names, will be made public if and when they are included in the Board Agenda.



# Feedback Form

Regional District of Okanagan-Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

TO: Regional District of Okanagan-Similkameen FILE NO.: X2024.018-ZONE

FROM: Name: Dawn Lennie  
(please print)

Street Address: [REDACTED]

Date: February 20, 2025

RE: Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

- ☐ I do support the proposed amendments to the OCP bylaw.
- ☐ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

*Thank you for the opportunity to provide feedback with regards to business licenses for B&Bs and STRs as well as STR permits for Area E.*

*The main issue in Naramata is the number of "dark houses" that are not used as a principal residence for the owner or a renter but are operated as an STR. The comments and questions below are with regards to addressing this issue, ensuring enforcement of the rules and providing the public the opportunity to provide input into the STR permit approval and renewal process.*

*As Area E has neither "Opted In" to the BC Government STR legislation and is also not subject to the Gov't "Speculation and Vacancy Tax", Area E is now an island with limited regulation surrounded by Kelowna, Penticton and Summerland which are all subject to both regulations. This makes Naramata an extremely attractive location for those looking to use properties primarily for short term rentals.*

*Given this situation, Area E needs to "Opt In" to the Gov't STR Principal Residence legislation in addition to providing further regulation and enforcement using STR permits and business licenses. The Principal Residence legislation does not restrict whole home rentals or require the owner/host be onsite during the rental, but it does ensure that the home was a principal residence for much of the year to be eligible to operate as an STR under the Provincial Principal Residence regulation. This is the best way to limit the number of "dark homes" and given the Prov Govt is responsible for enforcement, it has limited impact on RDOS resources.*

*As part of the STR permit process, there needs to be a process to notify neighbours of applications so that feedback can be provided prior to approval. Residents should also be able to access a list of properties that have valid business licenses and STR permits.*

*STRs should be limited to no more than one short term rental per parcel.*

*Combination of fees for both business license and STR permit should reflect the fact that during the time the home is used as an STR, the home is being used solely for commercial purposes versus as a B&B which continues to be inhabited by the principal resident during the rental period.*

*Include the restrictions suggested in the draft bylaw 3101 for STRs including limiting to 8 occupants and*

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*B&Bs have not proven to be an issue in Naramata. They do not negatively contribute to the "dark house" issue. They provide much needed accommodation and are principal residences with the operator on-site during the guest stays. As they do not provide kitchen facilities, they also support the local businesses that provide tourists with food options. These restrictions make B&Bs very different from STRs. Having the ability to ensure B&Bs follow regulations through the introduction of a business license is understandable, however the \$500 business license fee is excessive and not justified when compared to other jurisdictions and given the restrictions already placed on B&Bs which limit what they can charge vs STRs.*

Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting. All representations, including names, will be made public if and when they are included in the Board Agenda.



# Feedback Form

## Regional District of Okanagan-Similkameen

101 Martin Street, Penticton, BC, V2A-5J9  
Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen    **FILE NO.:** X2024.018-ZONE

**FROM:** Name: \_\_\_\_\_ Greg

Best \_\_\_\_\_  
(please print)

Street Address: \_\_\_\_\_

Naramata \_\_\_\_\_

Date: \_\_\_\_ Feb 20,  
2025 \_\_\_\_\_

**RE: Regulation of short-term rental accommodations in Electoral Areas  
"A", "C" & "E"**

**Proposed Official Community Plan (OCP) amendments**

My comments / concerns are:

I do support the proposed amendments to the OCP bylaw. I support making changes subject to the comments I have provided below.

I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

Thank you for the opportunity to provide feedback with regards to business licenses for B&Bs and STRs as well as STR permits for Area E.

The main issue in Naramata is the number of "dark houses" that are not used as a principal residence for the owner or a renter but are operated as an STR. The comments and questions below are with regards to addressing this issue, ensuring enforcement of the rules and providing the public the opportunity to provide input into the STR permit approval and renewal process.

As Area E has neither "Opted In" to the BC Government STR legislation and is also not subject to the Gov't "Speculation and Vacancy Tax", Area E is now an island with limited regulation surrounded by Kelowna, Penticton and Summerland which are all subject to both regulations. This makes Naramata an extremely attractive location for those looking to use properties primarily for short term rentals.

Given this situation, Area E needs to "Opt In" to the Gov't STR Principal Residence legislation in addition to providing further regulation and enforcement through the use of STR permits and business licenses. The Principal Residence legislation does not restrict whole home rentals or require the owner/host be onsite during the rental, but it does ensure that the home was a principal residence for the majority of the year to be eligible to operate as an STR under the Provincial Principal Residence regulation. This is the best way to limit the number of "dark homes" and given the Prov Govt is responsible for enforcement, it has limited impact on RDOS resources.

As part of the STR permit process, there needs to be a process to notify neighbours of applications so that feedback can be provided prior to approval. Residents should also be able to access a list of properties that have valid business licenses and STR permits.

STRs should be limited to no more than one short term rental per parcel.

Combination of fees for both business license and STR permit should reflect the fact that during the time the home is used as an STR, the home is being used solely for commercial purposes versus as a B&B which continues to be inhabited by the principal resident during the rental period.

Include the restrictions suggested in the draft bylaw 3101 for STRs including limiting to 8 occupants and provision of off street parking.

It is unclear what the purpose of maintaining the TUP process is. When would a residence not meet the STR permit requirements but would be eligible for a TUP? The TUP process should not be maintained for the purpose of allowing residential properties to have an option to operate an STR that does not meet the STR permit requirements (more than 8 occupants, more than one accommodation on a single parcel etc.)

Existing TUPs should be converted to STR permits and business licenses and follow the new requirements. If existing TUPs have to remain in place until they expire, they should still be required to obtain a business license. Once the existing term expires, the TUP should not be renewed and they should follow the STR permit application process. No new TUPs should be issued.

B&Bs have not proven to be an issue in Naramata. They do not negatively contribute to the "dark house" issue. They provide much needed accommodation and are principal residences with the operator on-site during the guest stay. As they do not provide kitchen facilities, they also support the local businesses that provide tourists with food options. These restrictions make B&Bs very different from STRs. Having the ability to ensure B&Bs follow regulations through the introduction of a business license is understandable, however the \$500 business license fee is excessive and not justified when compared to other jurisdictions and given the restrictions already placed on B&Bs which limit what they can charge vs STRs.



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen **FILE NO.:** X2024.018-ZONE

**FROM:** Name: Karen Verveda & Kathy Davies

Street Address: [REDACTED] Naramata, BC V0H 1N1

Date: February 20, 2025

**RE:** Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

☐ I do support the proposed amendments to the OCP bylaw.

☒ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

Thank you for the opportunity to provide feedback with regards to business licenses for B&Bs and STRs as well as STR permits for Area E.

The main issue in Naramata is the number of 'dark houses' that are not used as a principal residence for the owner or a renter but are operated as an STR. The comments and questions below are with regards to addressing this issue, ensuring enforcement of the rules and providing the public with the opportunity to provide input into the STR permit approval and renewal process.

As Area E has neither opted in to the BC Government STR legislation nor is it subject to the government *Speculation and Vacancy Tax*, Area E is now an island with limited regulations surrounded by Kelowna, Penticton and Summerland which are all subject to both regulations. This makes Naramata an extremely attractive location for those looking to use properties primarily for short term rentals.

Given this situation, Area E needs to 1) opt in to the government STR Principal Residence legislation and, in addition 2) provide further regulation and enforcement through the use of STR permits and business licenses. The Principal Residence legislation does not restrict whole home

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rentals nor require the owner / host be onsite during the rental, but it does ensure that the home was a principal residence for the majority of the year to be eligible to operate as an STR under the Provincial Principal Residence regulation. This is the best way to limit the number of 'dark homes' and given the provincial government is responsible for enforcement, it has limited impact on RDOS resources.

As part of the STR permit process, there needs to be a process to notify neighbours of applications so that feedback can be provided prior to approval. Residents should also be able to access a list of properties that have valid business licenses and STR permits.

STRs should be limited to no more than one short-term rental per parcel.

The combination of fees for both business license and STR permit should reflect the fact that during the time the home is used as an STR, the home is being used solely for commercial purposes versus as a B&B which continues to be inhabited by the principal resident during the rental period.

Include the restrictions suggested in the draft bylaw 3101 for STRs including limiting to 8 occupants and provision of off-street parking.

It is unclear what the purpose of maintaining the TUP process is. When would a residence not meet the STR permit requirements but would be eligible for a TUP? The TUP process should not be maintained for the purpose of allowing residential properties to have an option to operate an STR that does not meet the STR permit requirements (more than 8 occupants, more than one accommodation on a single parcel etc.)

Existing TUPs should be converted to STR permits and business licenses and follow the new requirements. If existing TUPs must remain in place until they expire, owners should still be required to obtain a business license. Once the existing term expires, the TUP should not be renewed, and owners should follow the STR permit application process. No new TUPs should be issued.

B&Bs have not proven to be an issue in Naramata. They do not negatively contribute to the 'dark house' issue. They provide much needed accommodation and are principal residences with the operator on-site during the guest stay. As they do not provide kitchen facilities, they also support the local businesses that provide tourists with food options. These restrictions make B&Bs very different from STRs. Having the ability to ensure B&Bs follow regulations through the introduction of a business license is understandable, however the \$500 business license fee is excessive and not justified when compared to other jurisdictions and given the restrictions already placed on B&Bs which limit what they can charge vs STRs.

- Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting.
- All representations, including names, will be made public if and when they are included in the Board Agenda.

# Feedback Form

**Regional District of Okanagan**

**Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email:

planning@rdos.bc.ca

**TO:** Regional District of Okanagan-Similkameen **FILE NO.:** X2024.018-ZONE

**FROM:** Name: \_\_\_\_\_ Nicole  
Hackworth \_\_\_\_\_

(please print)

Street Address: \_\_\_\_\_

Naramata \_\_\_\_\_

Date: \_\_\_\_\_ Feb 20,  
2025 \_\_\_\_\_

**RE: Regulation of short-term rental accommodations in Electoral Areas  
"A", "C" & "E"**

**Proposed Official Community Plan (OCP) amendments**

My comments / concerns are:

I do support the proposed amendments to the OCP bylaw. I support making changes  
subject to the comments I have provided below.

I do not support the proposed amendments to the OCP bylaw.

**Please provide any comments you wish the Board to consider:**

Thank you for the opportunity to provide feedback with regards to business licenses for B&Bs and STRs as well as STR permits for Area E.

The main issue in Naramata is the number of "dark houses" that are not used as a principal residence for the owner or a renter but are operated as an STR. The comments and questions below are with regards to addressing this issue, ensuring enforcement of the rules and providing the public the opportunity to provide input into the STR permit approval and renewal process.

As Area E has neither "Opted In" to the BC Government STR legislation and is also not subject to the Gov't "Speculation and Vacancy Tax", Area E is now an island with limited regulation surrounded by Kelowna, Penticton and Summerland which are all subject to both regulations. This makes Naramata an extremely attractive location for those looking to use properties primarily for short term rentals.

Given this situation, Area E needs to "Opt In" to the Gov't STR Principal Residence legislation in addition to providing further regulation and enforcement through the use of STR permits and business licenses. The Principal Residence legislation does not restrict whole home rentals or require the owner/host be onsite during the rental, but it does ensure that the home was a principal residence for the majority of the year to be eligible to operate as an STR under the Provincial Principal Residence regulation. This is the best way to limit the number of "dark homes" and given the Prov Govt is responsible for enforcement, it has limited impact on RDOS resources.

As part of the STR permit process, there needs to be a process to notify neighbours of applications so that feedback can be provided prior to approval. Residents should also be able to access a list of properties that have valid business licenses and STR permits.

STRs should be limited to no more than one short term rental per parcel.

Combination of fees for both business license and STR permit should reflect the fact that during the time the home is used as an STR, the home is being used solely for commercial purposes versus as a B&B which continues to be inhabited by the principal resident during the rental period.

It is unclear what the purpose of maintaining the TUP process is. When would a residence not meet the STR permit requirements but would be eligible for a TUP? The TUP process should not be maintained for the purpose of allowing residential properties to have an option to operate an STR that does not meet the STR permit requirements (more than 8 occupants, more than one accommodation on a single parcel etc.)

Existing TUPs should be converted to STR permits and business licenses and follow the new requirements. If existing TUPs have to remain in place until they expire, they should still be required to obtain a business license. Once the existing term expires, the TUP should not be renewed and they should follow the STR permit application process. No new TUPs should be issued.

B&Bs have not proven to be an issue in Naramata. They do not negatively contribute to the "dark house" issue. They provide much needed accommodation and are principal residences with the operator on-site during the guest stay. As they do not provide kitchen facilities, they also support the local businesses that provide tourists with food options. These restrictions make B&Bs very different from STRs. Having the ability to ensure B&Bs follow regulations through the introduction of a business license is understandable, however the \$500 business license fee is excessive and not justified when compared to other jurisdictions and given the restrictions already placed on B&Bs which limit what they can charge vs STRs.

Penticton Business licence is \$220.

Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting. All representations, including names, will be made public if and when they are included in the Board Agenda.



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen

**FILE NO.:** X2024.018-ZONE

**FROM:** Name: Miranda and Del Halladay  
(please print)

Street Address:



Date: Feb 21st

**RE:** Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

☐ I do support the proposed amendments to the OCP bylaw. **SUBJECT TO THE COMMENTS AND QUESTIONS OUTLINED BELOW**

☐ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

## Feedback on Draft Bylaw for Business Licenses and STR Permits in Area E

Thank you for the opportunity to provide feedback on business licenses for B&Bs and STRs, as well as STR permits for Area E.

### Key Concern: The Issue of "Dark Houses" and lack of existing regulation and/or enforcement

The growing and disproportionate number of "dark houses" in Naramata is a fundamental concern for community wellbeing. Maintaining a permanent population is fundamental for the social, cultural and economic wellbeing of Naramata. Dark homes are properties that are no longer by definition residential - neither a principal residence for an owner nor a long-term renter. These properties are by operational definition, "commercial" - operated solely as short-term rentals (STRs).

Area E has neither opted into BC's STR Principal Residence legislation nor is subject to the **Speculation and Vacancy Tax**, unlike surrounding municipalities (Kelowna, Penticton, and Summerland).



This lack of regulation makes Naramata highly attractive for investors purchasing homes primarily for STR use and benefitting from residential taxation in an entirely commercial endeavor.

**I support the bylaw change SUBJECT TO THE FOLLOWING AMENDMENTS AND CLARIFICATION:**

**1. Opting into BC's STR Principal Residence Legislation**

- Area E should **opt into the Provincial STR Principal Residence regulation**, which:
  - Ensures the home is a principal residence **for most** of the year before being eligible to operate as an STR.
  - Limits "dark houses" while keeping enforcement at the provincial level, reducing RDOS resource burden.

**2. Strengthening STR Permit & Licensing Regulations through the Bylaw/Business Licence Function**

- **Neighbour Notification & Public Input**
  - The STR permit process should include a **notification system** for neighbours to provide feedback before approval.
  - Residents should have access to a **public list** of properties with valid business licenses and STR permits.
- **STR Limitations**
  - STRs should be **limited to one per parcel**.
  - STRs should adhere to restrictions proposed in Draft Bylaw 3101, including:
    - A maximum of **8 occupants per STR**.
    - **Off-street parking** requirements.
- **Fee Structure & Commercial Use Considerations**
  - STR permit and business license fees should **reflect that STRs operate as commercial businesses**, unlike B&Bs, where the owner remains on-site.

**3. Transitioning Away from Temporary Use Permits (TUPs)**

- **Clarify the Purpose of Maintaining TUPs**
  - It is unclear why the TUP process is being retained.
  - **Question:** When would a residence not qualify for an STR permit but still be eligible for a TUP?
  - TUPs should **not be used** to allow properties to operate outside STR permit requirements (e.g., exceeding occupancy limits or operating multiple accommodations on a single parcel).
- **Converting Existing TUPs to STR Permits & Business Licenses**

- Existing TUPs should be **converted** to STR permits and business licenses under the new regulations.
- If TUPs must remain valid until expiry, they should **still require a business license**.
- Once expired, TUPs should **not be renewed**, and properties should apply for an STR permit.
- **No new TUPs should be issued** for STRs.

#### **4. Differentiating B&Bs from STRs & Adjusting Business License Fees**

- **B&Bs Do Not Contribute to the "Dark House" Issue**
  - B&Bs provide needed accommodations while keeping homes occupied by residents.
  - They **support local businesses** by offering lodging without kitchen facilities, ensuring guests dine at local restaurants.
- **Business License for B&Bs**
  - Introducing a business license requirement for B&Bs is understandable for regulatory compliance.
  - However, the **\$500 license fee is excessive and pecuniary**, particularly given:
    - The restrictions already placed on B&Bs (e.g., on-site operator requirement, no full kitchen).
    - The **lower revenue potential** of B&Bs compared to STRs.

#### **Conclusion**

To ensure the bylaw effectively serves Area E's residents and businesses, the following steps should be taken:

- ✓ **Opt into BC's STR Principal Residence Legislation** to limit "dark houses."
- ✓ **Require neighbour notification and public input** for STR permits.
- ✓ **Restrict STRs to one per parcel, with an 8-occupant limit and off-street parking.**
- ✓ **Eliminate new TUPs for STRs and transition existing ones to the new system.**
- ✓ **Reduce the B&B business license fee to a more reasonable amount.**



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen **FILE NO.:** X2024.018-ZONE

**FROM:** Name: NaramataSlow Community Group  
(please print)

Street Address: \_\_\_\_\_

Date: Feb 21st

**RE:** Regulation of short-term rental accommodations in Electoral Areas "A", "C" & "E"  
Proposed Official Community Plan (OCP) amendments

My comments / concerns are:

☐ I do support the proposed amendments to the OCP bylaw. **SUBJECT TO THE COMMENTS AND QUESTIONS OUTLINED BELOW**

☐ I do not support the proposed amendments to the OCP bylaw.

Please provide any comments you wish the Board to consider:

## Feedback on Draft Bylaw for Business Licenses and STR Permits in Area E

Thank you for the opportunity to provide feedback on business licenses for B&Bs and STRs, as well as STR permits for Area E.

### Key Concern: The Issue of "Dark Houses" and lack of existing regulation and/or enforcement

The growing and disproportionate number of "dark houses" in Naramata is a fundamental concern for community wellbeing. Maintaining a permanent population is fundamental for the social, cultural and economic wellbeing of Naramata. Dark homes are properties that are no longer by definition residential - neither a principal residence for an owner nor a long-term renter. These properties are by operational definition, "commercial" - operated solely as short-term rentals (STRs).

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This lack of regulation makes Naramata highly attractive for investors purchasing homes primarily for STR use and benefitting from residential taxation in an entirely commercial endeavor.

**I support the bylaw change SUBJECT TO THE FOLLOWING AMENDMENTS AND CLARIFICATION:**

**1. Opting into BC's STR Principal Residence Legislation**

- Area E should **opt into the Provincial STR Principal Residence regulation**, which:
  - Ensures the home is a principal residence **for most** of the year before being eligible to operate as an STR.
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**2. Strengthening STR Permit & Licensing Regulations through the Bylaw/Business Licence Function**

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    - **Off-street parking** requirements.
- **Fee Structure & Commercial Use Considerations**
  - STR permit and business license fees should **reflect that STRs operate as commercial businesses**, unlike B&Bs, where the owner remains on-site.

**3. Transitioning Away from Temporary Use Permits (TUPs)**

- **Clarify the Purpose of Maintaining TUPs**
  - It is unclear why the TUP process is being retained.
  - **Question:** When would a residence not qualify for an STR permit but still be eligible for a TUP?
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- Once expired, TUPs should **not be renewed**, and properties should apply for an STR permit.
- **No new TUPs should be issued** for STRs.

#### 4. Differentiating B&Bs from STRs & Adjusting Business License Fees

- **B&Bs Do Not Contribute to the "Dark House" Issue**
  - B&Bs provide needed accommodations while keeping homes occupied by residents.
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- **Business License for B&Bs**
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  - However, the **\$500 license fee is excessive and pecuniary**, particularly given:
    - The restrictions already placed on B&Bs (e.g., on-site operator requirement, no full kitchen).
    - The **lower revenue potential** of B&Bs compared to STRs.

#### Conclusion

To ensure the bylaw effectively serves Area E's residents and businesses, the following steps should be taken:

- ✓ **Opt into BC's STR Principal Residence Legislation** to limit "dark houses."
- ✓ **Require neighbour notification and public input** for STR permits.
- ✓ **Restrict STRs to one per parcel, with an 8-occupant limit and off-street parking.**
- ✓ **Eliminate new TUPs for STRs and transition existing ones to the new system.**
- ✓ **Reduce the B&B business license fee to a more reasonable amount.**

## Lauri Feindell

---

**From:** Mark Saar [REDACTED]  
**Sent:** February 21, 2025 5:02 PM  
**To:** Planning  
**Subject:** Area E STR feedback

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Some people who received this message don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

As a Naramata property owner and resident I strongly support anything that reduces, minimizes or eliminates short term vacation rentals in the Naramata area.

There is multiple rationale:

1). We have been subject to a number of noise and parking issues from nearby compliant (i.e. have a TUP) and non-compliant (i.e. no TUP) STR's. This is particularly galling given the tranquility that generally exists in the area and the reason that we and many have chosen to live there. Adding a business license requirement doesn't change any of that. Owners may be in-area but definitely not living on-site while paying guests are there so problem guest issues are not addressed timely if at all.

2). STR's operate to the detriment of our local hospitality industry. Both restaurants and lodging are economically struggling (e.g. recent closure of the Naramata Inn) and STR's keep people from using restaurants and take paid beds away from lodging operators. To be clear, I support traditional B&B's which (as kitchenless ) send visitors to restaurants and (as owner full-time onsite) ensure noise and other issues are minimized.

The best solution is to choose to opt into the no-STR policy. And don't add more onerous license fees to traditional B&B operators.

Mark Saar

## RESPONSE SUMMARY

### AMENDMENT BYLAW NOS. 3099 & 2800.50

- ☐ Approval Recommended for Reasons Outlined Below
- ☒ Interests Unaffected by Bylaw
- ☐ Approval Recommended Subject to Conditions Below
- ☐ Approval Not Recommended Due to Reasons Outlined Below

**Zoning Amendment Bylaws No 3099 & 2800.50; File: X2024.017-ZONE**

***Our interests are unaffected by the zoning changes, however:***

The Kaleden Irrigation District requests that for billing purposes, we receive a listing semi-annually of the short-term rental and Air BnB licenses issued within Area I, or a copy of each license as they're issued.

Thank-you

Signature: Cheryl E. Halla

Signed By: Cheryl E. Halla

Agency: Kaleden Irrigation District

Title: Financial/Corporate Administrator

Date: March 3, 2025

**Lauri Feindell**

---

**From:** Teresa Anderson [REDACTED]  
**Sent:** March 5, 2025 1:29 PM  
**To:** Planning  
**Cc:** OIB-Referrals  
**Subject:** RE: Referral - ZONE - STR Review Areas "A", "C" & "E" | File No. X2024.018-ZONE

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

**RE: 30 (Thirty) day extension**

Thank you for the above application. This email is to inform you that due to current levels of internal capacity, we are unable to review your referral in your proposed timeline. With additional time, the Osoyoos Indian Band will be able to ensure that an informed review process will occur. We are setting the new timeline to be 30 days from the existing timeline.

Most recently, the Supreme Court of Canada in the *Tsilquot'in* case confirmed that the province has been applying an incorrect and restrictive test to the determination of Aboriginal Title. Aboriginal Title includes the exclusive right of a First Nation to decide how that land is used and the right to benefit economical from those uses.

Please note that *not* receiving a response regarding a referral from the Osoyoos Indian Band in the pre-application, current or post-application stage does not imply our support for the project.

We appreciate your co-operation.

Thank you,

**Teresa Anderson**  
Referrals Coordinator



**Osoyoos Indian Band**  
**P:** 250.498.3444 Ext. 3046  
**F:** 250.498.6577  
[referrals@oib.ca](mailto:referrals@oib.ca)  
[www.oib.ca/](http://www.oib.ca/)

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March 6, 2025

File: 0280-30

Local Government File: X2024.017-ZONE and X2024.018-Zone

Ben Kent, Planner II  
Regional District of Okanagan-Similkameen  
Via Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

Dear Ben Kent:

**Re: Short Term Rental Review**

Thank you for providing B.C. Ministry of Agriculture and Food (Ministry) staff the opportunity to comment on the draft OCP and Zoning amendments to change how short-term rentals are regulated in Electoral Areas "A", "C", "D", "E", "F" and "I". Ministry staff support the RDOS in regulating short-term rentals in the ALR through bylaws, business licences and short-term rental permits rather than the Temporary Use Permits used previously and have the following comments and suggestions:

- The new bylaws should be consistent with provincial direction on Short Term Vacation Rentals and the *Agricultural Land Commission Act* and Regulations.
- We understand that previously the Temporary Use Permits had to be posted on the premises and for properties within the ALR, contained language notifying guests that they were staying in a farming area and may experience "normal farm practices" as a result. Ministry staff recommend that this be carried forward and used in this new regulatory scheme as well. The business licence or short-term rental permit should be posted on site and we suggest the following language:
  - *Please be advised that you are staying within an active agricultural area that is commonly associated with noise from farm operations, farm odours, chemical spray and dust at various times of the day.*

Please contact Ministry staff if you have any questions regarding the above comments.

Sincerely,



Alison Fox, P.Ag.  
Land Use Agrologist  
Ministry of Agriculture, Food  
and Fisheries  
Alison.Fox@gov.bc.ca  
(778) 666-0566

Email copy: Lindsay Hainstock, Regional Agrologist, B.C. Ministry of Agriculture and Food,  
[Lindsay.Hainstock@gov.bc.ca](mailto:Lindsay.Hainstock@gov.bc.ca)

Claire Buchanan, ALC Regional Planner, [ALC.Referrals@gov.bc.ca](mailto:ALC.Referrals@gov.bc.ca)

## Lesley Gibbons

---

**From:** dalepaton [REDACTED]  
**Sent:** March 13, 2025 11:43 AM  
**To:** Planning  
**Subject:** RDOS Short term rentals

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

You previously requested input on the RDOS short term rental proposal, and I provided feedback with my support.

I just now, learned from an article on myNaramata.com, that because Naramata has not opted in to the Principal Residence requirement, that there won't be a principal residence requirement under the new proposal.

It's disappointing to me that this wasn't made clear in the initial communication of the proposal and I have to find out by a 3rd party. This was largely the reason for my support. Other than that there is little the new proposal offers, other than a chance for the RDOS to collect some fees. It will do nothing to address the concerns of residents.

I have never heard adequate explanation why our director chose not to opt in. She mentioned wanting a 'solution customized to Naramata' - but that is vague and I've yet to hear of any progress on that.

From my perspective - the personal residence requirement is still the best solution that has been brought forward.

Dale Paton  
[REDACTED]

Naramata BC,  
V0H 1N1

Sent with [Proton Mail](#) secure email.



# Feedback Form

**Regional District of Okanagan-Similkameen**

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: [planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**TO:** Regional District of Okanagan-Similkameen **FILE NO.:** X2024.017-ZONE

**FROM:** Name: \_\_\_\_\_ Kara Parachoniak \_\_\_\_\_  
(please print)

Street Address: \_\_\_\_\_

Date: \_\_\_\_\_ March 14, 2025 \_\_\_\_\_

**RE:** Regulation of short-term rental accommodations in Electoral Areas "D", "F" & "I"  
Proposed Official Community Plan (OCP) & Zoning bylaw amendments

My comments / concerns are:

- ☐ I do support the proposed amendments to the OCP & Zoning bylaws.
- ☒ I do not support the proposed amendments to the OCP & Zoning bylaws.

**Please provide any comments you wish the Board to consider:**

Please amend the licensing fee for B&B

## Services & Amenities

- **B&B:** Usually provides breakfast, housekeeping, and sometimes concierge services.
- **STR:** Typically, a self-service rental without daily housekeeping or meals

## -Revised-

Dear RDOS Council,

I am requesting that the business licensing fee for Bed-and-Breakfasts (B&Bs) be considered separately from Short-Term Rentals (STRs). While both fall under accommodations, B&Bs operate very differently and have higher operational costs.

Unlike STRs, B&Bs require on-site owner presence, include breakfast, and often provide daily housekeeping and upkeep. They are a more hands-on business that enhances tourism while reducing bylaw concerns due to responsible hosting.

Additionally, providing breakfast adds significant costs, including:

Protecting your personal information is an obligation the Regional District of Okanagan-Similkameen takes seriously. Our practices have been designed to ensure compliance with the privacy provisions of the *Freedom of Information and Protection of Privacy Act* (British Columbia) ("FIPPA"). Any personal or proprietary information you provide to us is collected, used and disclosed in accordance with FIPPA. Should you have any questions about the collection, use or disclosure of this information please contact: Manager of Legislative Services, RDOS, 101 Martin Street, Penticton, BC V2A 5J9, 250-492-0237.

- Purchasing fresh local ingredients regularly.
- Increased utility use for food preparation and housekeeping

Given these differences, I respectfully ask the RDOS to:

1. Create a separate licensing category for B&Bs, distinct from STRs.
2. Reduce the licensing fee for B&Bs to reflect their higher costs, the increased onsite presence required and their positive impact on tourism.

As mentioned in some of my previous communications, adding additional costs (e.g., hefty business licensing fees) to the already high costs of running a B&B may actually prevent us from continuing.

Sadly, the costs outweigh the benefits, and as a result, the B&B business model may disappear.

Please consider reducing the cost of the annual business license fee for the B&B business model.

Sincerely,  
Kara Parachoniak

**Feedback Forms must be submitted to the RDOS office prior to noon on the day of the applicable Board meeting.  
All representations, including names, will be made public if and when they are included in the Board Agenda.**

## Lesley Gibbons

---

**From:** Cliff Boyd [REDACTED]  
**Sent:** March 15, 2025 1:21 PM  
**To:** Planning  
**Subject:** Feedback: I support the Regional District's proposal for business licence bylaw for short-term rental

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

My apologies for sending this after the feedback cutoff date, however I'd still like to submit the following feedback for consideration.

As a homeowner in Electoral Area 'A', I support the proposed regulations for properties in the RDOS being required to comply with requirements in order to obtain an STR business license.

I live directly next door to a property in Electoral Area 'A', which operated as a short-term rental last summer. I'm concerned about this STR use continuing without being required to comply to regional district regulations. I'm wary of the rapid turnover, potential additional guests, parking issues and the overall lack of safety when the owners aren't living at the property. Each of these potential issues should be regulated and enforced.

Therefore, I am in support of the RDOS adopting the same licensing requirements as the Town of Osoyoos.

Thank you,

Cliff Boyd  
[REDACTED]

Address: [REDACTED]

## Lesley Gibbons

---

**From:** Stacey Cleveland [REDACTED]  
**Sent:** March 17, 2025 8:26 AM  
**To:** Planning  
**Subject:** Area E (Naramata) Short-Term Rental feedback

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Hello,

In regards to the short-term rental rules currently under review for Naramata (Area E), our preference would be to "opt in" to the existing Provincial regulations. Failing that, we strongly feel that short-term rentals be restricted to principal residences.

Sincerely,  
Stacey & Dave Cleveland  
[REDACTED]



March 25, 2025

Reply to the attention of Claire Buchanan  
ALC Planning Review: 103927  
Local Government File: X2024.018-ZONE

Ben Kent  
RDOS  
[planning@rdos.bc.ca](mailto:planning@rdos.bc.ca)

**Re: Amendments to Electoral Area "A", "C", and "E" OCP – Short Term Rental Accommodations**

Thank you for forwarding a draft copy of the Bylaw Referral for amendments to Electoral Area "A", "C", and "E" for short term rental accommodations ("Referral") for review and comment by the Agricultural Land Commission ("ALC"). The following comments are provided to help ensure that the Referral is consistent with the purposes of the *Agricultural Land Commission Act* (ALCA), the Agricultural Land Reserve ("ALR") General Regulation, the ALR Use Regulation, and any decisions of the ALC.

The Referral proposes several amendments to the Official Community Plan ("OCP") Bylaws for Electoral Area "A", "C", and "E" in relation to short-term rental accommodations. Specifically, the Referral proposes to update the OCP policy statements regarding short-term rental accommodations to support these in residential, rural-residential, agricultural, and rural land use designated through the issuance of a Short-Term Rental Accommodation ("STR") permit.

ALC staff understand that the amendments proposed are applicable to residential, rural-residential, agricultural, and rural land use designations; however, there does not appear to be any mention of the ALR and the provisions that apply to land within the ALR.

For clarification, certain types of short-term tourist accommodation are permitted in the ALR without the requirement for an application subject to specific criteria. Section 34 of the ALR Use Regulation permits up to 4 bedrooms for tourist accommodation in the nature of a "bed and breakfast" in a principal residence where the host lives subject to criteria. However, short-term rental of an entire

principal residence (such as a whole house rental) is not permitted and requires an application to the Commission.

Section 33 of the ALR Use Regulation permits agri-tourism accommodation with up to 10 "sleeping units" which may be comprised of a bedroom or other area used for sleeping located in a residence, cabin or other structure; a vehicle, trailer, tent or other structure located on a campsite, field or other area subject to criteria.

Local government bylaws can be more restrictive of some uses in the ALR, including prescribed tourist accommodation and agri-tourism accommodation uses, than the ALCA and its regulations. However, a local government's restriction or prohibition of a permitted use in the ALR does not trigger an application to the Commission.

ALC staff recommend clarifying that for parcels in the ALR, the short-term rental use must be consistent with the ALR Use Regulation or a decision of the ALC. More information on the short-term rentals in the ALR can be found in *ALC Information Bulletin 06: Tourist and Agri-Tourism Accommodation in the ALR*.

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The ALC strives to provide a detailed response to all referrals affecting the ALR; however, you are advised that the lack of a specific response by the ALC to any draft provisions cannot in any way be construed as confirmation regarding the consistency of the submission with the ALCA, the regulations, or any decisions of the Commission.

This response does not relieve the owner or occupier of the responsibility to comply with applicable Acts, regulations, bylaws of the local government, and decisions and orders of any person or body having jurisdiction over the land under an enactment.

If you have any questions about the above comments, please contact the undersigned at 236-468-2034 or by e-mail at [ALC.Referrals@gov.bc.ca](mailto:ALC.Referrals@gov.bc.ca).

Yours truly,



Claire Buchanan, Regional Planner

CC: Ministry of Agriculture and Food – Attention: Alison Fox  
103927m1

March 26, 2025

Reply to the attention of Claire Buchanan  
ALC Planning Review: 103929  
Local Government File: X2024.017-ZONE

Ben Kent  
Regional District of Okanagan Similkameen

**Re: Amendments to Electoral Area "D", "F", and "I" OCP – Short Term  
Rental Accommodations**

Thank you for forwarding a draft copy of the Bylaw Referral for a series of amendments to Electoral Area "D", "F", and "I" OCP Bylaw in relation to short term rental accommodation ("Referral") for review and comment by the Agricultural Land Commission (ALC). The following comments are provided to help ensure that the Referral is consistent with the purposes of the *Agricultural Land Commission Act* (ALCA), the Agricultural Land Reserve (ALR) General Regulation, the ALR Use Regulation, and any decisions of the ALC.

**OCP Amendment Bylaw No. 2099 and Zoning Amendment Bylaw No. 2800.05**

ALC staff appreciate that 7.11 of the Zoning Amendment Bylaw states that short-term rental accommodation is permitted provided that for *"parcels situated within the Agricultural Land Reserve (ALR), a short-term rental accommodation use is permitted only to the extent that it is consistent with applicable provincial legislation or an approval from the Agricultural Land Commission (ALC) has been granted for such a short-term rental accommodation use."*

Additionally, the Referral proposes several amendments to the Official Community Plan ("OCP") Bylaws for Electoral Area "D", "F", and "I". Specifically, the Referral proposes to update the OCP policy statements regarding short-term rental accommodations to support these in residential, rural-residential, and rural land use designated through the issuance of a "Short-Term Rental Accommodation ("STR") permit.

ALC Staff understand that the amendments proposed are applicable to residential, rural-residential, agricultural, and rural land use designations; however, there

does not appear to be any mention of the ALR and the provisions that apply to land within the ALR.

For clarification, certain types of short-term tourist accommodation are permitted in the ALR without the requirement for a non-adhering residential use application subject to specific criteria. Section 34 of the ALR Use Regulation permits up to 4 bedrooms for tourist accommodation in the nature of a "bed and breakfast" in a principal residence where the host lives subject to criteria. However, short-term rental of an entire principal residence (such as a whole house rental) is not permitted and requires an application to the Commission.

Section 33 of the ALR Use Regulation permits agri-tourism accommodation with up to 10 "sleeping units" which may be comprised of a bedroom or other area used for sleeping located in a residence, cabin or other structure; a vehicle, trailer, tent or other structure located on a campsite, field or other area subject to criteria.

Local government bylaws can be more restrictive of some uses in the ALR, including prescribed tourist accommodation and agri-tourism accommodation uses, than the ALCA and its regulations. However, a local government's restriction or prohibition of a permitted use in the ALR does not trigger an application to the Commission.

ALC staff recommend clarifying that for parcels in the ALR, the short-term rental use must be consistent with the ALR Use Regulation or a decision of the Commission. More information on the short-term rentals in the ALR can be found in ALC Information Bulletin 06: Tourist and Agri-Tourism Accommodation in the ALR.

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The ALC strives to provide a detailed response to all referrals affecting the ALR; however, you are advised that the lack of a specific response by the ALC to any draft provisions cannot in any way be construed as confirmation regarding the consistency of the submission with the ALCA, the regulations, or any decisions of the Commission.

This response does not relieve the owner or occupier of the responsibility to comply with applicable Acts, regulations, bylaws of the local government, and

decisions and orders of any person or body having jurisdiction over the land under an enactment.

If you have any questions about the above comments, please contact the undersigned at 236-468-2034 or by e-mail at [ALC.Referrals@gov.bc.ca](mailto:ALC.Referrals@gov.bc.ca).

Yours truly,

A handwritten signature in black ink that reads "Claire Buchanan". The signature is written in a cursive, flowing style.

Claire Buchanan, Regional Planner

CC: Ministry of Agriculture and Food – Attention: Alison Fox

103929m1