

Lauri Feindell

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

From: Dennis Smith <dsmith@rdos.bc.ca>

Sent: February 5, 2025 11:44 AM

To: Ben Kent <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

250-462-5023



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: 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

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

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

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

FROM: Name: Patti Lacis. _____
(please print)

Street Address: [REDACTED] 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.

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.



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-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



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

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

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.
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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: 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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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: _____ 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.

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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

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.)

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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:

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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.

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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.)

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Penticton Business licence is \$220.

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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: Miranda and Del Halladay
(please print)

Street Address: [REDACTED]

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

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

FROM: Name: NaramataSlow Community Group
(please print)

Street Address: _____

Date: Feb 21st

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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

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 economically 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
www.oib.ca/

Disclaimer

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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

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

Claire Buchanan, ALC Regional Planner, ALC.Referrals@gov.bc.ca