



COLUMBIA SHUSWAP REGIONAL DISTRICT

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Honourable Ravi Kahlon
Minister of Housing and Municipal Affairs
PO Box 9074, STN Prov Govt
Victoria, BC V8W 9E2

Honourable Brittny Anderson
Minister of State for Local Governments and Rural Communities
PO Box 9041 STN Prov Govt
Victoria, BC V8W 9E1

Dear Ministers:

Re: Short Term Rental Challenges and Concerns

The CSR D covers a vast geographic region of 28,929 square kilometers and delivers 115 distinct services, maintains infrastructure, and assists with financing agreements for its municipalities and seven electoral areas. There are estimated to be well over 1500 Short Term Rentals (STR) in the CSR D. In some of our rural communities, many of these STR play a vital tourism and economic development role where there are limited accommodation options. The roll-out of the new Provincial Short-term Rental Registry will cause undue hardship to the owners of these STR and poses severe administrative capacity constraints to CSR D development staff to evaluate permitting for these rentals. As a result, the CSR D Board of Directors in February 2025 voted unanimously to bring concerns of the CSR D's electoral area directors to the Province Government.

Background

The implementation of STR regulations is creating a complex situation for STR owners and the CSR D. Only a fraction of STR operators have rezoned their property or obtained a Temporary Use Permit (TUP), or are in the process of acquiring a TUP, to legalize their operation in accordance with CSR D bylaws. When owners become aware of their non-compliance status with CSR D land use bylaws, they are encouraged to collaborate with staff to obtain the necessary approvals; such approval processes can take several months. Additionally, for some of the electoral areas of the CSR D, it was only in late 2024 that TUPs were approved for use by the Board providing STR owners with a direction to address their compliance status. The short timeline for STR owners to register Provincially creates a risk that STR owners will not be able to obtain a TUP in adequate time to be compliant with the Provincial registry.

Issue 1: Alignment of Provincial Registry with Local Bylaws

CSR D staff have assumed that the CSR D is required to respond to the Province regarding an STR's compliance with local bylaws. If not compliant, and no TUP has been granted, such STRs will be

ELECTORAL AREAS

A GOLDEN-COLUMBIA
B REVELSTOKE-COLUMBIA

C EAGLE BAY-WHITE LAKE-TAPPEN
D FALKLAND-SALMON VALLEY

E SICAMOUS-MALAKWA
F NORTH SHUSWAP-SEYMOUR ARM
G BLIND BAY-SORRENTO-NOTCH HILL

MUNICIPALITIES

GOLDEN
REVELSTOKE

SALMON ARM
SICAMOUS

removed from the provincial registry and the owner is subject to substantial provincial fines if the operation continues. It is CSRD policy that bylaw enforcement may be held in abeyance if the landowner is making an effort to deal with their compliance issue or have made an application seeking to comply with land use bylaws.

Additionally, it is our understanding that the Province may not issue the required STR registration number to residents, or may revoke a STR registration, even if an application process is underway to legalize the STR with CSRD land use bylaws. This situation leaves the STR operators in a difficult position as they work to legalize their rental and comply with both regional district and provincial regulations, which can take many months to complete. Given the May 1, 2025 application deadline for STR registration, there is insufficient time for STR operators and the CSRD to address the potential consequences of this deadline.

It is also a concern that STR operators may believe that receiving a provincial STR registration number signifies a completed process. We request that your process communicate that registry applicants contact their local government to ensure all bylaw requirements are met.

Issue 2: Timeline for local bylaw compliance

The timeline to achieve full compliance with over 1500 STR properties in the CSRD presents a huge challenge due to the complex nature of provincial requirements and local government bylaws, most notably given that the provincial regulations were only released on January 20, 2025. The CSRD Board of Directors meets only once a month, so the expectation of the Development Services staff and the Board itself will face an unrealistic burden and expectation with the anticipated significant influx of applications. There is insufficient time and capacity to review and process hundreds of applications in less than two months by the provincial registry deadline of May 1, 2025.

CSRD staff and property owners require time to adjust to the new regulations, including understanding and implementing the provincial STR registry requirements. The rapid rollout of the program has created difficulty in adapting quickly. Local governments received program information on January 20, 2025, with an information session two weeks later. This leaves local governments and operators less than two months to adapt to the registry process.

We recognize that provincial staff are aware of the tight deadlines and are adhering to the rules laid out by the provincial regulations, but the CSRD has found some of the regulatory information to be unclear on the process. The condensed timeline, along with the complexity of the new regulations, is challenging for all stakeholders. It underscores the need for improved communication, clearer guidelines, and a flexible implementation schedule to ensure a smooth transition to the new framework.

Issue 3: STR Definition

There is concern with the broad definition of STR as it exempts bed and breakfasts, inns, lodges, and resorts. Without a distinct category or a formal definition within provincial legislation to differentiate them from short-term vacation rentals, they are subject to undue restrictions such as tourism accommodation, playing a critical role in our tourism infrastructure. We urge the Province to provide clarity within the Short-Term Rental Accommodations Act and define the above to differentiate them from short-term vacation rentals.

Issue 4: Potential Enforcement Expectations of the CSRD

The CSRD is concerned about the Provincial government's expectations regarding bylaw enforcement, particularly the potential downloading of responsibilities regarding bylaw enforcement, to local authorities. There is limited departmental capacity for enforcement and a very real possibility that the regional district will be tasked with enforcing regulations that are fundamentally provincial responsibilities.

With enforcement commencing after the May 1, 2025, application deadline, non-compliant STR hosts and operators will start receiving fines. There is a lack of clarity regarding the uniform application of enforcement and how it will be applied consistently and fairly across the different provincial jurisdictions, further contributing to the uncertainty and confusion of the program.

Request

The CSRD staff and Board acknowledge the importance of an STR registry but have significant concerns about how the Provincial Registry is interacting with local bylaw permitting, the implementation timeline, short-term rental definitions, and enforcement expectations. Given the operational challenges posed by the short deadlines, the Board is formally requesting additional time to properly adopt the new regulations.

Additionally, the Board would like to present the following for consideration:

- Can hosts who have initiated the application process for CSRD bylaw compliance, but are not yet fully compliant, be issued a provincial registration number to continue operations?
- For hosts who already possess a provincial registration number, is it possible for them to remain in operation while they work toward full compliance with CSRD bylaws?
- As noted above, further clarification is needed within the Short-Term Rental Accommodations Act and a distinct category that includes bed and breakfasts, inns, lodges, and resorts, is needed to differentiate them from short-term vacation rentals.
- Also as noted above, clarification is needed regarding the Province's expectations on regional government enforcement.

The Board supports a flexible approach with extended deadlines, which would greatly assist in achieving the shared goal of STR compliance with regulations.

Summary

STRs play an important and significant role in supporting the regional tourism economy by attracting visitors and boosting local businesses. It is essential that STRs continue operating while working toward compliance with CSRD bylaws. Their positive contribution to the community should not be disregarded.

In summary, given the factors noted above, it is not possible that the CSRD will be able to process and approve 1,500 applications for legal STR operation by the May 1, 2025 deadline, creating a significant burden on both CSRD staff and the Board.

The Board is confident that you recognize the importance of our concerns with the STR registry deadlines, and we look forward to your continued assistance and collaboration in providing the support required for long-term registry program success. We look forward to your response.

Yours truly,

COLUMBIA SHUSWAP REGIONAL DISTRICT

Per:



Natalya Melnychuk

Board Chair

cc: Regional Districts