

# Valemount



## *Housing Needs & Demands Assessment*

### **Final Report**

January 11, 2016

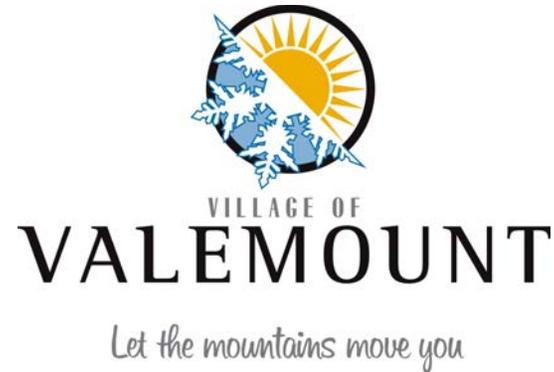
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## Final Report

prepared for the



created by

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# CHAPTER 1

## *Introduction*

### **1.0 Purpose of the *Valemount Housing Needs & Demands Assessment***

The goal of the *Valemount Affordable Housing Needs & Demands Assessment* is to:

- Inform decisions that will result in a robust and diverse housing supply that meets the needs and provides options for the full range of Valemount residents;
- Help position the Village of Valemount to establish a housing supply that aligns with economic growth and diversification opportunities; and
- Identify housing delivery options that can be pursued promptly, as well as in the medium and long term.

The objectives of this study are to develop and provide:

- A demographic profile for the Valemount area (e.g., an analysis of current and emerging population data related to population growth, demographic changes, and population projections);
- A housing profile for the Valemount area (e.g., an analysis of current and emerging data related to the current and planned supply of market ownership and rental housing; affordable near-market and non-market rental housing, and dedicated supportive housing);
- An income profile for the Valemount area (e.g., an analysis of current and emerging income data, including estimates of the number and types of households who are likely to be:
  - In Core Housing Need (i.e., earning incomes at or below current published *Housing Income Limits – or HILs*); and
  - At-risk of homeless (i.e., in “dire housing need” paying 50% or more of their income on housing).
- A housing needs profile for the Valemount area (e.g., an analysis of current and emerging data related to the following five (5) key housing needs and challenges:
  - Affordability (housing costs)
  - Adequacy (quality and safety)
  - Suitability (overcrowding)
  - Accessibility (for persons with mobility challenges)
  - Availability (options and choice)
- An analysis of factors other than housing costs that impact affordable housing and housing affordability in the Village of Valemount.





# CHAPTER 2

## *Key Findings*

### 1.0 Population Analysis

Population growth and demographic changes can result in housing supply and demand imbalances if the rate and/or nature of that growth exceeds the ability of various sectors within the community (e.g., the public, private and non-profit sectors – either individually or collectively) to respond effectively to these growth pressures by keeping pace with demand for new infrastructure, including housing and related support services. Supply and demand imbalances can result in escalating housing prices and oversubscription of available support services – increasing the number of households experiencing housing difficulties and potentially increasing the risk of homelessness.

#### 1.1 Population Growth

- Between 1991 and 2011, Valemount’s permanent population decreased by an estimated 9.6% (for an average annual decline of 0.5%). In comparison, the population of British Columbia grew by 34.1% (an average of 1.7% per year) while the total population of Canada grew by 22.6% (an average of 1.1% per year).
- Given that the permanent population of Valemount began to decline some time between 1996 and 2001, these dynamics are only partially related to the closing of the local mill in 2007/2008 (i.e., these dynamics were already in place prior to the closing of the mill).
- Observed growth rates in Valemount over the past 15-20 years would be considered stagnant. As a result, growth in the community’s *permanent* population is unlikely to be putting a strain on the Village’s housing supply – more likely the opposite (i.e., if housing supply and demand constraints are emerging, those constraints are more likely to be coming from the Village’s *non-permanent* population including recreational/seasonal property investors and second home buyers).

#### 1.2 Population Projections

- Combining observed trends within the *Census of Population* data with regional projections developed by the Province suggests a total *permanent* population of 715 – 1,065 residents (for a middle-ground estimate 910 residents) living in the Village by 2035 – all requiring safe, stable housing that is affordable according to their means.
- It is important to note that these projections are unable to predict growth within the *non-permanent* population (i.e., temporary and seasonal workers) brought about by the planned ski hill and resort development should it proceed.
- Efforts are required to encourage the ski hill proponents to provide data that accurately predicts both the permanent and non-permanent population growth that will likely occur in the area should the proposed development proceed.



- Should the planned ski hill and resort development proceed, population growth pressures are likely to emerge in the foreseeable future – resulting in increasing demand for housing. If these needs cannot be addressed effectively, this growth will likely increase the risk of housing challenges and hardships (particularly among low- and modest-income households).

### 1.3 Population Mobility

- Population mobility between 2006 and 2011 resulted in Valemount gaining 220-249 new residents while at the same time losing 218-247 existing residents (21.4% – 24.2%) – for a net growth of 0.2% (2 residents total). This would be considered a high degree of population mobility when compared to the 13.2% – 14.6% population turnover rates observed province-wide over the same period.
- The high degrees of population mobility (i.e., population turnover) observed between 2006 and 2011 can have an adverse effect on the delivery of housing and related support services locally (especially housing and related support services that require ongoing case management).

### 1.4 Demographic Changes

- Over the past 15-20 years, Valemount has experienced:
  - An increase in both real numbers and percentage (relative proportion) of:
    - Older adults (45+);
    - Empty-nesters and early retirees; and
    - Seniors (especially older seniors).
  - A decline in both real numbers and percentage (relative proportion) of:
    - Both young and established families with children.
- The age cohorts that appear to be moving into Valemount are more likely to have:
  - Established themselves in their careers, thus more likely to be earning higher incomes;
  - Already established themselves in the housing market, thus affording them higher equity and savings; and/or
  - Paid off their mortgages.
- The age cohorts that are moving into Valemount at a slower rate (or leaving the area altogether) include those who are:
  - More likely to be just starting out in their careers, thus more likely to be earning lower incomes; and/or
  - Entering the housing market for the first time.
- This suggests that issues and challenges related to housing availability and affordability *may* be having an influence on population growth and demographic changes in the community (as well as those related more directly to employment).



## 1.5 Household Characteristics

- Over the past 15-20 years, Valemount has experienced:
  - A 23.1% decrease in the *relative proportion* of **couple households**
  - A 7.4% decrease in the *relative proportion* of **lone-parent households**
  - A 52.0% increase in the *relative proportion* of **single individuals**
  - A 45.9% increase in the *relative proportion* of **“other” household types**
- Changes in the nature and composition of Valemount households suggest a need for:
  - Increased housing diversity;
  - Greater housing affordability and choice; and/or
  - More flexible home designs and options that can accommodate multiple un-related individuals living together while maintaining appropriate levels of privacy and separation (e.g., legally-conforming secondary suites, dormitory-style units, cluster homes, co-housing, etc.).

## 1.6 Lone-Parent Families

- An estimated 80-90% of lone-parent families (35-40) living in Valemount consisted of single mothers in 2011 (with the remaining 15-25% – or 5-10 lone-parent families – consisting of single fathers).
- Given the amount of suppression and rounding associated with this data, it is difficult to *accurately* describe the degree to which the proportion of single mothers to single fathers has changed over the past 15-20 years. However, the data does appear to show a slight increase in both the number and proportion of single fathers over time.
- Changes in the number and proportion of lone-parent families (as well as changes in the number and proportion of single mothers vs. single fathers) can be both a reflection of and have an influence on the affordable housing needs of the community. However, the data that is currently available for Valemount makes evaluation difficult.

## 1.7 Household Co-Habitation

- 11.1% of lone-parent families (5), 24.4% of single individuals (55), and 14.3% of single seniors (10 seniors ages 65+) were co-habiting either with other family or with non-related families and individuals in 2011.
- When household cohabitation figures are combined with data showing that “other” household types are increasing over time in terms of real numbers and relative proportion, it suggests the likelihood of housing affordability challenges and the potential for overcrowding – both of which are recognized risk factors for homelessness.

## 1.8 Average Household Size

- Average household size appears to be decreasing over time – from an average of 2.7 persons per dwelling (PPD) in 1996 to an average of 2.2 PPD in 2011 (a decrease of 18.9%).



- This data appears consistent with the data showing an increase in both the number and relative percentage of one-person household types.
- A declining average household size suggests a need for increased housing diversity (e.g., more multi-residential housing options as well as smaller single-family homes on smaller lots) that may or may not reflect the desires and expectations of those households living in and moving into the area – or the skills and expectations of those who have experience developing housing in the area.

## 2.0 Income Analysis

Income growth and change can affect local housing needs and emerging challenges. For most people and in most circumstances, a steady, stable, and *sufficient* income is required in order to maintain one's housing (i.e., to be able to continue making rent or mortgage payments on time yet still have enough money left over to cover utilities and a wide range of other basic needs). If incomes are not keeping pace with cost of living increases, if housing costs are increasing at a faster rate than incomes, or if incomes are beginning to polarize (i.e., gaps between the wealthy and the poor living in the community are emerging and/or growing) housing challenges are likely to increase in terms of real numbers, in terms of the relative proportion/percentage of the population experiencing those challenges, and even in terms of the income levels affected.

### 2.1 Median Household Incomes

- Between 2006 and 2013, median household incomes among:
  - Couple families (i.e., childless couples and couples with children) increased by 21.4%;
  - Lone-parent families increased by only 4.2%; and
  - Single individuals increased by 20.6%.
- However, when compared to the province as a whole:
  - The average couple earned 11.0% less than its provincial counterpart;
  - The average lone-parent family earned 24.2% less than its provincial counterpart; and
  - The average single individual earned only 2.1% more than his or her provincial counterpart.
- Median household incomes have generally increased at a faster rate than both the Consumer Price Index (CPI) and the Shelter Index (SI) for most household types – the exception being lone parent incomes when compared to the Consumer Price Index (CPI).
- Individual households whose incomes either decreased between 2006 and 2013 or whose incomes increased at a slower rate than either the CPI or (especially) the Shelter Index are more likely to be experiencing housing hardship as their housing costs are likely to be increasing faster than their incomes.



## 2.2 Detailed Household Incomes

- Between 2006 and 2013, the Valemount area experienced:
  - A net *increase* in the percentage of households earning:
    - \$75,000 - \$99,999
    - \$100,000+
  - A net *decrease* in the percentage of households earning:
    - \$0 - \$24,999
    - \$25,000 - \$49,999
    - \$50,000 - \$74,999
- When compared to the province as a whole the Valemount area has:
  - A *higher* percentage of households earning:
    - \$25,000 - \$49,999
    - \$75,000 - \$99,999
  - A *lower* percentage of households earning:
    - \$0 - \$24,999
    - \$50,000 - \$74,999
    - \$100,000+

## 2.3 Labour Force & Employment

- Between 1996 and 2011, Valemount experienced the following shifts in employment by industry or sector:
  - A net *gain* of residents employed in:
    - Health & Education: 25 jobs
    - Business Services: 10 jobs (despite a significant net decline since 2001)
  - A net *loss* of residents employed in:
    - Manufacturing & Construction: -100 jobs
    - Agriculture & Resource: -55 jobs
    - Wholesale & Retail: -50 jobs
    - Finance & Real Estate: -15 jobs
    - “Other” Services: -15 jobs (despite fluctuations up and down over time)
- Valemount also experienced the following shifts in employment by occupation:
  - A net *gain* of residents employed in:
    - Management: 25 jobs



- Social Science, Education, Government & Religion: 20 jobs
- Health: 5 jobs
- A net *loss* of residents employed in:
  - Sales & Service: -50 jobs
  - Primary Industry: -35 jobs
  - Processing, Manufacturing & Utilities: -35 jobs
  - Trades, Transport & Equipment Operators: -30 jobs
  - Business, Finance & Administration: -25 jobs
  - Art, Culture, Recreation & Sport: -20 jobs
  - Natural & Applied Sciences: -10 jobs
- Either as a result or despite these changes, the “top 3” sources of employment among Valemount residents in 2011 were:
  - By industry or sector:
    - Health & Education: 65 jobs (16.0%)
    - Manufacturing & Construction: 50 jobs (12.3%)
    - “Other” Services: 220 jobs (54.3%)
  - By occupation:
    - Trades, Transport & Equipment Operators: 140 jobs (30.4%)
    - Sales & Service: 125 jobs (27.2%)
    - Business, Finance & Administration: 55 jobs (12.0%)
- Additional data included in a 2014 study titled *Housing Affordability in the Village of Valemount*<sup>1</sup> identifies the four (4) largest employment industries or sectors for Valemount residents as being:
  - Accommodation and Food Services (19.3%)
  - Transportation and Warehousing (17.2%)
  - Health Care and Social Assistance (7.5%)
  - Retail Trade (7.5%)
- Between 1996 and 2011, the *relative* percentage of Valemount residents employed in occupations *generally* paying:
  - Well-above-average wages and salaries decreased by 18.6%
  - Above-average wages and salaries increased by 5.5%
  - Average wages and salaries increased by 27.3%
  - Below-average wages and salaries increased by 100.5%
  - Well-below-average wages and salaries decreased by 14.3%

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<sup>1</sup> Northern Development Initiative Trust and the Village of Valemount, *Housing Affordability in the Village of Valemount*, July 30, 2014, page 2.



- This suggests that changes within the local economy over the past 15-20 years have likely resulted in maintaining relative levels of income inequality over time (rather than exacerbating them) due mainly to the increased percentage of residents employed in occupations paying wages and salaries in the mid ranges combined with the decrease in the percentage of residents employed in occupations paying wages and salaries at either extreme.
- Those who are more likely to be earning generally below-average incomes in Valemout (and, therefore, more likely to be experiencing housing affordability and related challenges and concerns) include:
  - People working in retail, accommodation and food service jobs (especially if they are only able to work on a part-time basis);
  - People working in arts, entertainment and recreation jobs;
  - People working in entry-level administrative positions across various sectors;
  - People working in entry-level health sector positions;
  - People with disabilities that limit their overall employability (including mental health, physical health and/or substance misuse);
  - People with limited education and/or job skills (again, limiting their overall employability);
  - Families with children (particularly single mothers/grandmothers) – especially if they lack access to affordable child care (and, therefore, reduced opportunities for full-time employment) or are having difficulty receiving stable and consistent child support;
  - Visible minorities, including Aboriginal people and/or residents who are unable to speak an official language;
  - People with institutional backgrounds, experience with foster care, service in the military, or experience in prisons;
  - Seniors with limited pensions (especially senior women living alone) who during their prime working years fell into either of the categories listed above; and
  - Individuals living in the smaller and more isolated communities of the region with limited access to affordable transportation (personal or public) and, therefore, reduced access to employment opportunities in the larger communities.

## **2.4 Social Assistance Rates and Incidences of Poverty**

- Social Assistance rates in the Valemout area have remained stable over time (5.2%). The overall rate of Social Assistance dependency in 2013 was an estimated 23.9% *lower* than the provincial average of 6.8%.
- Overall poverty rates [as determined by the total number and percentage of households earning incomes at or below the after-tax Low-Income Measure (LIM)] have decreased slightly over time (by 7.7% – or from 16.9% in 2006 to 15.6% in 2013). The overall poverty rate in 2013 was an estimated 19.1% *lower* than the provincial average of 19.3%.
- The observed reduction in poverty rates and relative stability in terms of Social Assistance dependency are likely helping to moderate if not reduce local housing affordability challenges.
- However, there are still an estimated 120 households (15.6%) in the Valemout area who are living in poverty for any number of reasons – some of which may be beyond their life skills and/or control.



### **3.0 Housing Supply Analysis**

Communities generally need to offer a mix of housing types and sizes. The greater the diversity, the more options residents are likely to have and be able to choose from to meet their individual needs and aspirations. Limited diversity can limit choice and thereby increase the likelihood that people in the community may be living in homes that do not meet their needs in terms of size (e.g., being either over-housed or under-housed/living in overcrowded conditions) or affordability level. If there is insufficient housing diversity within a community to meet the varied needs of an increasingly diverse population, there is a greater likelihood of residents experiencing housing constraints and/or hardships.

#### **3.1 Dwellings by Type**

- Valemout has less housing diversity when compared to the province as a whole due to a stronger emphasis on single detached dwellings (i.e., single family homes and mobile homes).

#### **3.2 Dwellings by Tenure**

- The majority of homes in Valemout are owner-occupied (as is the case in the majority of communities across the province).
- Due to the net loss of five (5) rental units (along with five owned units), the relative percentage of units available to renters has declined – but only very slightly (by an estimated 3.7% over the past 15-20 years).

#### **3.3 Seasonal vs. Permanent Ownership**

- In 2011, as many as 118 homes (up to 20%) in Valemout *may* have been owned by seasonal/recreational homeowners and property investors. This represents a 142.4% increase in the percentage of homes potentially owned by seasonal/recreational homeowners and property investors between 2001 and 2011.
- In comparison, an estimated 9.3% of homes province-wide were potentially owned by seasonal/recreational homeowners and property investors (an increase of 39.3% between 2001 and 2011).
- If seasonal/recreational homeownership and property investment from outside the community is in fact increasing (as the data would suggest), it can lead to increased housing supply and demand constraints as well as housing hardship – especially for low- and modest-income households who have fewer housing options and less buying power to begin with.

#### **3.4 Average Dwelling Values Over Time**

- Between 1996 and 2011, average home values nearly doubled in Valemout – for an average annual increase of 5.3% (compared to 8.5% province-wide).
- Average home values in Valemout remain consistently lower than the provincial average.



- The number of homes sold in the Village of Valemount and in the surrounding rural area over the past two years varies considerably from month to month. So too does the median price of those homes sold from month to month. Both dynamics are typical.
- There appears to be a recent spike in the area’s residential real estate activity. Feedback indicates that this spike coincides with the formal application being submitted recently seeking approval for the proposed ski hill and resort development.

### **3.5 Changing Housing Costs Over Time**

- Over the past 15-20 years, average housing costs have increased to varying degrees among both homeowners and renters – suggesting that housing affordability may be declining over time for renters and homeowners alike.

### **3.6 Estimated Current Market Housing Costs – Homeownership**

- The median sale price of homes sold to date in Valemount has increased by an estimated 11.1% since last year (2014).
- Depending on the type of dwelling being sought, its size, location and attributes, homes in Valemount currently sell for anywhere between \$67,000 and \$340,000 – requiring an estimated income of \$15,750 to \$67,500 for a first-time homebuyer.
- The overall median price of homes sold in Valemount during the first eight (8) months of 2015 was \$155,000 – requiring an estimated income of \$32,500.
- The current “entry-level” housing market consists of homes ranging in price from \$67,000 to \$95,000 – requiring an estimated income of \$15,750 to \$21,000 for a first-time homebuyer.
- Given the limited number of homes that exist within Valemount’s current “entry-level” housing market, first-time homebuyers earning incomes of less than \$20,000 are likely to experience difficulty finding a suitable and adequate home to purchase within their means.

### **3.7 Estimated Current Market Housing Costs – Rental**

- People looking to acquire an *average-priced* rental unit in Valemount through the formal rental market require the following incomes in order for that housing to be affordable:
  - 1-Bedroom: \$490 (est. income: \$19,600);
  - 2-Bedrooms: \$590 (est. income: \$23,600);
  - 3-Bedrooms: \$900 (est. income: \$36,000); and
  - 4-Bedrooms: \$1,025 (est. income: \$41,000).



- Finding an affordable unit to rent in Valemount is likely to be a challenge for:
  - Single residents earning less than \$20,000 per year seeking to live on their own – especially given the limited number of bachelor units available;
  - Childless couples earning combined total incomes of \$20,000 or less;
  - Small and/or young families (including lone-parent families) earning combined total incomes of \$30,000 or less; and
  - Larger families (including lone-parent families) earning combined total incomes of \$35,000 or less.
- These households are unlikely to be able to find affordable rental accommodations in Valemount without facing other housing issues related to suitability (i.e., living in overcrowded conditions), adequacy (i.e., living in homes in need of major repairs), and/or accessibility (i.e., living in homes that do not provide for people with limited mobility and other health or stamina limitations).

### **3.8 Affordable and Supportive Housing Inventory**

- Valemount does not appear have any non-market affordable and/or supportive housing such as Group Homes, Family Violence Shelters, or Emergency Shelters.
- Other than a very limited supply of staff accommodations, Valemount does not appear to have any near-market affordable and/or supportive housing. The near-market affordable housing units geared towards First Nations that did exist in the community appear to have been recently sold and are most likely being repurposed as staff accommodations.
- The majority of affordable and/or supportive housing in Valemount appears to focus on the housing needs of *independent* seniors (23 units in total).
- Consultations with senior staff for the Village of Valemount indicate that there are currently no plans underway to develop additional purpose-built affordable and/or supportive housing – either in the form of non-market, near-market or seniors'-oriented housing.

### **4.0 Housing Needs Analysis**

Four (4) standard categories are used to quantify housing challenges and/or hardships:

1. Adequacy (physical safety and maintenance of the home);
2. Suitability (proper size of the home given the size of the household);
3. Accessibility (the degree to which housing meets the needs of persons with health, mobility or stamina limitations); and
4. Affordability (the cost of the home related to the household's income).

Housing availability and choice is an emerging fifth challenge; however, there is currently no standardized statistical measurement used to quantify availability and choice. Of the four measures that can be readily quantified, housing affordability is typically the dominant issue for



the majority of households experiencing difficulty. However, it also tends to both affect and be affected by other housing issues and challenges. For example, households unable to afford the average price of market housing (either rental or homeownership) may find themselves being limited to housing that is too small to meet their needs (leading to suitability challenges – i.e., overcrowding). Alternatively, homeowners who find themselves paying an excessive amount of their income on their mortgage payments may not be able to afford the ongoing upkeep and maintenance required to keep their homes in good condition (which can lead to adequacy issues – i.e., homes in need of major repairs) or pay for upgrades to their homes to make them more manageable for someone with mobility challenges such as an ageing senior or family member with a disability (leading to accessibility challenges). Similarly, renters may find themselves with few housing choices available that are affordable to them other than rental properties that are poorly maintained by their owners. Persons with severe disabilities (potentially experiencing accessibility challenges) are more likely to be low-income earners as a result of their disability and are, therefore, more likely to experience any number of affordability, adequacy, and/or suitability challenges. Seniors typically fall into either or a combination of these situations.

#### **4.1 Housing Adequacy**

- An estimated 50 homes (10.5%) in Valemount were in need of major repairs as of 2011. These homes *could* be considered inadequate depending on the specific nature and extent of the repairs needed.
- Comparing these figures to the 2011 provincial average of 7.2% indicates that Valemount (at 10.5%) has a higher-than-average rate of homes in need of major repairs.
- The data also shows that both the total number and total percentage of homes in need of major repairs has decreased over time (from 75 homes in 2006 to 50 homes in 2011 – a net decrease of 33.4%).

#### **4.2 Housing Suitability**

- Either there were no households (0.0%) in Valemount living in overcrowded conditions in 2011 or that data has been suppressed in accordance with Statistics Canada policy (i.e., if there are residents in Valemount living in overcrowded conditions, that number is likely to be less than 5).

#### **4.3 Housing Accessibility**

- An estimated 5-10 residents (approx. 0.8%) living in Valemount are *potentially* in need of more accessible housing (or at least specialized features and equipment to enter, exit and move around within their homes).

#### **4.4 Housing Affordability**

- Overall housing affordability – as expressed by both the total number and relative percentage of households spending 30% or more of their income on housing – appears to be improving over time. However, overall housing affordability among homeowners appears to be declining. This is demonstrated by the following dynamics:



- Actual changes in the total number (#) of households spending 30% or more of their income on housing:
  - All households paying 30%+ on housing: decreased by up to 5
  - Homeowners paying 30%+ on housing: increased by up to 10
  - Renters paying 30%+ on housing: decreased by up to 15
- Relative changes in the total percentage (%) of households spending 30% or more of their income on housing:
  - All households paying 30%+ on housing: decreased by 2.0%
  - Homeowners paying 30%+ on housing: increased by 30.8%
  - Renters paying 30%+ on housing: decreased by 12.1%
- A comparison between the percentage (%) growth in the total number of households vs. the percentage (%) growth in the total number of households spending 30% or more of their income on housing:
  - % decline in the total number of households: 3.1%
  - % decline in the total number of households spending 30% or more on housing: 5.0%
- As a result of these trends, an estimated 95 households (20.0%) were paying 30% or more of their income on housing in 2011, including approximately 45 homeowners (12.9%) and approximately 50 tenants (42.3%).
- The percentage of households experiencing affordability challenges in Valemount appears to fluctuate over time.
- The percentage of renters and homeowners alike experiencing affordability challenges in 2011 was noticeably if not significantly lower in Valemount than the provincial average.
- An estimated 165 *census families* (21.4%) in the Valemount area are *potentially* in current need of more affordable housing based on their declared incomes in 2013 [i.e., these households are estimated to be earning incomes at or below the 2013 *Housing Income Limits (HILs)*]. This includes an estimated:
  - 10 couples with children (6.3%)
  - 15 couples without children (6.5%)
  - 35 lone-parent families (50.0%)
  - 105 single individuals (33.9%)
- An estimated 60 *census families* (7.8%) in the Valemount area are *potentially* in severe need of more affordable housing based on their declared incomes in 2013 [i.e., these households are potentially paying 50% or more of their income on housing, which would place them at risk of becoming homeless if their housing needs are not being met). This includes an estimated:
  - <5 couples with children (1.6%)
  - <5 couples without children (1.1%)
  - 20 lone-parent families (28.6%)
  - 35 single individuals (11.3%)



- A *conservative* estimate suggests that up to 95 households (20.0%) in the Village of Valemount are likely to be currently in need of affordable housing, including:
  - Up to 60 households (12.7%) who are likely to be in “core housing need” (i.e., paying 30%-49% of their income on housing); and
  - Up to 35 households (7.3%) who are likely to be in “severe housing need” (i.e., paying 50% or more of their income on housing – thus placing them at risk of homelessness).
- There may be <5 individuals currently experiencing varying degrees of homelessness in Valemount. Some of these individuals may be homeless youth.

#### 4.5 Housing Availability and Choice

- Anecdotal evidence of challenges related to housing availability and choice was gathered through a Focus Group Meeting and an online Community Survey.
- The data and feedback gathered from these sources indicates that Valemount has a number of gaps in its housing continuum – both rental and ownership – producing a mismatch between what people need and what is either available or that they can reasonably afford.
- According to the Focus Group participants, factors affecting the community’s ability to provide a full range of housing options and choices include:
  - **The cost of new construction:** in addition to increasing material costs, there are also challenges with accessing the trades and contractors needed to build more housing due to Valemount’s remote location.
  - **The age and overall quality of housing in Valemount:** there are a number of homes in need of major repairs and the added cost of repairing, renovating and upgrading those homes that are affordable can pose a challenge.
  - **Regulatory challenges:** obtaining a mortgage for housing options that are relatively more affordable (e.g., mobile homes and small starter homes) can be difficult.
  - **Knowledge:** the need for greater creativity and exploration of best practices and success stories from elsewhere that may be appropriate for Valemount.
- According to survey respondents:
  - The “top 5” reasons why someone might experience difficulty finding appropriate housing for themselves or their household include:
    - #1:** The lack of a broad enough range of affordable homes to rent and/or purchase
    - #2:** The poor quality and/or need major repairs and upgrades among homes that are affordable
    - #3:** The speed at which homes that become available for rent are “snapped up” (i.e., taken)
    - #4:** The small size of homes that are affordable (causing privacy issues)
    - #5:** A tie between the limited number of bedrooms present in homes that are affordable (causing overcrowding) and difficulties accessing information about homes that are available for rent



- The “top 5” forms of assistance identified by survey respondents as being needed to help Valemount residents find and maintain safe, stable housing include:
  - #1:** Affordable rental housing
  - #2:** Assistance with home repairs or maintenance
  - #3:** Assistance with lawn and yard care or maintenance, including snow removal
  - #4:** Affordable childcare
  - #5:** Rent subsidies
- The breakdown of households by type who are currently experiencing challenges related to housing availability and choice in Valemount include (in order based on number and percentage of respondents):
  - Couples with children
  - Childless couples (including "empty nesters") under the age of 65
  - Single individuals under the age of 65 living alone
  - Lone-parent families
  - Senior couples 65+

## 4.6 Housing Targets

Low- and modest-income households are likely to have fewer housing options available to them than higher-income households. Households with limited options and choices are more likely to experience and be vulnerable to a variety of challenges, including those related to housing affordability, adequacy, suitability, and accessibility. Using a combination of data from Statistics Canada, including the 2011 *Census of Population*, the 2011 *National Household Survey* and *Taxfiler* data from 2013 demonstrates a hierarchy of housing needs in Valemount. Based on the estimated number and percentage of individuals and/or households affected, that hierarchy is as follows:

- **Affordability:** up to 95 households (20.0%) may be having difficulty affording the cost of housing, including:
  - Up to 60 households (12.7%) who are likely to be in “core housing need” (i.e., paying 30%-49% of their combined before-tax income on housing); and
  - Up to 35 households (7.3%) who are likely to be in “severe housing need” (i.e., paying 50% or more of their combined before-tax income on housing – thus placing them at risk of homelessness).
- **Adequacy:** up to 50 homes (10.5%) may be in need of major repairs
- **Accessibility:** up to 5-10 residents (0.8%) may be having difficulty entering, exiting and moving around within their homes due to health, stamina and/or mobility challenges
- **Suitability:** fewer than 5 households may be living in overcrowded conditions (data appears to have been suppressed in accordance with Statistics Canada policy)
- **Absolute Homelessness:** fewer than 5 individuals may be homeless at any given time

These figures represent current housing priorities for the Village of Valemount.



# Chapter 3

## *Summary of Affordable Housing Best Practices*

### **1.0 Introduction**

Affordable housing “best practices” represent strategies and solutions that have been tried elsewhere and proven successful at increasing the supply and availability of affordable housing. They offer communities the opportunity to learn from others and to see a broader range of potential solutions. They also offer communities a greater level of confidence that, under the right conditions and with the right resources (financial, political, staffing and expertise), these strategies from elsewhere can provide viable solutions for addressing local housing needs.

### **2.0 “Bricks and Mortar” Tools and Best Practices**

A number of common models and tools are used to make the development and construction of housing more affordable by...

- Reducing the cost to acquire land for housing development and construction:
  - Land donations
  - Discounted/below-market sales of land
  - Long-term land leases
- Increasing the number of units that can be built on a given parcel of land (i.e., distributing the cost of land across a larger number of units than might otherwise be possible):
  - Small lot single-family developments
  - Higher-density developments
  - Mixed-use developments
  - Mixed-density developments
  - Innovative land-use zoning
- Reducing planning, development and/or infrastructure costs associated with housing development and construction:
  - Streamlined municipal planning approval processes
  - Education to promote clearer expectations and a better understanding of the municipal regulatory process and its requirements



- Effective public consultation to reduce NIMBY (“Not in My Backyard”)
- Design-build agreements
- Infrastructure cost sharing
- Reducing the material costs associated with housing development and construction:
  - Smaller homes
  - Modest units/amenities
  - Modular construction
  - Locally-sourced building materials
  - Recycled building materials
  - Donated building materials
- Reducing the labour costs associated with housing development and construction:
  - In-kind donations/contributions of specialized skills, experience and expertise
  - Locally-sourced and/or locally-trained labour
  - Sweat equity
- Reducing the profit motivation associated with housing development and construction:
  - Recruiting and providing assistance to non-profit developers and housing providers
  - Creating a locally owned and operated non-profit housing developer and/or operator (e.g., as a social enterprise)

A number of common models and tools are also used to reduce the ongoing costs of operating and managing affordable housing, maintaining one’s housing and/or pursuing future housing upgrades and renovations by...

- Reducing the ongoing operating and maintenance costs of housing:
  - Green technologies and design
- Helping residents (homeowners and tenants alike) share or otherwise pool their money together to afford the ongoing costs of their housing:
  - Secondary suites
  - Shared Housing Programs
  - Mixed-income developments



- Reducing future renovation and upgrading costs to help occupants remain in their homes over time as their needs, priorities, lifecycles, health and/or mobility change:
  - Barrier-Free/Universal Design
  - FlexHousing™

Tools and techniques aimed at keeping housing more affordable over the long-term by developing and implement resale restrictions that not only limit the types of households who can occupy the housing (i.e., low- and modest-income households only) but also limit or restrict any future valuation of the housing to an objective criteria or formula (e.g., the Consumer Price Index or other fixed annual percentage). A number of common models and tools are used to enforce these resale restrictions by...

- Placing legal instruments on a property's certificate of title, such as:
  - Caveats and Restrictive Covenants
  - Right of First Refusal
  - Second Mortgages

### **3.0 Organizational Structures and Best Practices**

Regardless of the operating model that is eventually chosen, a range of private-for profit trades contractors (e.g., framers, plumbers, electricians, finishing carpenters, etc.) and development professionals (e.g., architects, engineers, project managers, etc.) will likely be contracted for the construction of a new affordable housing project depending on the construction method and tendering process used.

There are also promising models and structures specifically designed to serve seniors and adults with disabilities within small, private group home settings, including:

- Family Care Homes
- Satellite Homes

A variety of models and structures are also available to pursue the creation of affordable housing through semi-private and non-profit housing developers, builders and property managers/landlords, including:

- Non-Profits and Registered Charities
- Housing Co-operatives
- Cohousing
- Community Land Trusts (CLTs)
- Non-Profit Development Corporations (NPDCs) and Housing Authorities



## 4.0 Financial Tools and Best Practices

Fundraising is a common approach used to make housing more affordable. A variety of models and tools exist and are used either solely or in combination, including:

- Accessing capital grants from governmental and quasi-governmental sources (e.g., BC Housing, Columbia Basin Trust, etc.);
- Accessing Seed Funding and Proposal Development Fund (PDF) Loans from Canada Mortgage & Housing Corporation (CMHC);
- Seeking long-term provincial support in the form of rent supplements and/or rent subsidies to close the gap between market rents and the rents that low- and modest-income households can afford;
- Seeking long-term provincial support in the form of long-term contracts and/or operating agreements;
- Financial donations (e.g., from private individuals and businesses, community groups, local lending institutions, real estate boards, foundations, etc.);
- Donations of building materials;
- In-kind donations of professional services (e.g., accounting, legal, planning and development expertise, etc.) from local businesses, the municipality, etc.;
- Free, discounted or long-term leased land; and/or
- Where possible, taking advantage of a project proponent's charitable status to benefit from GST rebates and/or provincial property transfer tax exemptions.

Several techniques can be used to take advantage of traditional bank financing opportunities in order to make housing more affordable, including:

- Preferred Rate Financing
- Pooling of Resident Equity
- Refinancing/Lines of Credit

Additional models and tools exist that can help to improve both the social and financial viability of an affordable housing project – thereby increasing access to traditional bank financing, including:

- Mixed-Income Housing Projects
- Social Enterprises



In addition to traditional bank financing, organizations may also be able to acquire low-interest financing provided by small-scale pools of *local* investment capital, including:

- Community Investment Deposits (CIDs)
- Community Bonds
- Community Reinvestment Funds (CRFs)
- Housing Reserve/Trust Funds (HRFs/HTFs)

## 5.0 Municipal Tools and Best Practices

The Alberta Urban Municipalities Association's (AUMA) Housing and Social Development Task Force has developed a framework that organizes approaches that municipalities can use to address local affordable housing issues into the following nine (9) categories:

1. Education & Advocacy
2. Removing Barriers
3. Incentives
4. Requirements
5. Fees and Taxes
6. Government Land
7. Private Non-Profits
8. Financial Approaches
9. Municipal Housing Authorities & Corporations

Examples of municipal initiatives that support affordable housing **education & advocacy** include:

- Research
- Information Portals
- Networking
- Outreach Programs
- Housing Registries
- Report Cards
- Task Forces
- Media Relations
- Public Consultation



Examples of municipal approaches used to **remove barriers** to affordable housing include:

- Streamlining or fast-tracking the development permit approval process for affordable housing projects
- Reducing or waiving development fees for affordable housing projects
- Reducing development requirements for affordable housing projects (e.g., reduced set-backs, reduced road allowances, reduced parking requirements, etc.)
- Reducing requirements for public amenity spaces and/or road allowances for affordable housing projects
- Developing new zoning options and alternatives that encourage a wider variety of housing types, forms and densities in the community and more flexible, effective and/or creative uses of existing land, including:
  - Narrow-Lot Subdivisions
  - Infill Lots
  - Mixed Use
  - Secondary Suites
  - Manufactured Home Neighbourhoods
  - Panhandle/Z-Lot Subdivisions
  - Cluster Housing
  - Employee Housing Districts
  - RV Parks
  - Perpetually Affordable Housing Districts
- Developing a standard policy and guidebook for community consultations to assist developers in dealing more effectively with NIMBY opposition to new affordable housing proposals.

Examples of **municipal incentives** to promote affordable housing include:

- Density Bonuses
- Infrastructure Cost Sharing

Examples of municipal **requirements** for affordable housing include:

- Inclusionary Zoning
- Commercial Linkage Programs
- Housing Replacement Policies
- Restrictions on Land Use Re-designations



Examples of **municipal fees and taxes** that can be used to capitalize a Housing Reserve/Trust Fund include:

- Development Cost Charges/Surcharges
- Business Taxes
- Pillow Taxes/Visitor Accommodation Taxes
- Property Taxes (Residential and Commercial)

Examples of strategies municipalities have used to **acquire and/or provide government-owned land** for affordable housing include:

- Negotiated Land Acquisitions
- Unused Road Allowances
- Consolidating Underutilized Parcels
- Annexation
- Tax Foreclosures
- Acquiring Surplus Federal/Provincial Land
- Purchasing Land Through a Housing Reserve/Trust Fund

Examples of how municipalities can **assist non-profit housing organizations** include:

- Targeted Invitations
- Development Assistance
- Partnerships
- In-Kind Support
- Funding Support

Examples of **direct municipal financial approaches** to support those either in need of affordable housing or those seeking to build affordable housing (often funded through the creation of a Housing Reserve/Trust Fund) include:

- Capital Grants
- Direct-to-Resident Grants and Subsidies
- Property Tax Rebates/Abatements/Deferrals
- Preferred Municipal Financing
- Municipal Tax Receipts



Examples of **municipal non-profit housing authorities** operating in BC include:

- Revelstoke Housing Authority
- Tofino Housing Corporation
- Whistler Housing Authority



# CHAPTER 4

## *Recommendations*

### 1.0 Introduction

The following is a list of recommended strategies for the Village of Valemount to pursue in order to encourage both the development and the retention of a broader range affordable housing options in the community. These strategies are organized according to three (3) goals:

- Goal #1:** Minimize the Loss of Existing Affordable Housing
- Goal #2:** Encourage the Development of New Affordable Housing
- Goal #3:** Build Additional Community Capacity to Promote Affordable Housing

Where appropriate, the recommendations within each of the three goals are presented in order of anticipated priority.

### 2.0 Recommendations Aimed at Minimizing the Loss of Existing Affordable Housing

The positive results of efforts by the community to increase the supply of affordable housing through new construction and new initiatives can be diminished or even cancelled out by the loss of existing affordable housing units through residential redevelopment and conversions. The following is a list of recommended strategies for the Village of Valemount to consider in order to prevent the loss of existing housing units that are considered appropriate and affordable to the various target groups.

**Recommendation #1:** *The Village is encouraged to establish preferred siting criteria for affordable housing.*

**Explanation:** developing preferred siting criteria for affordable housing would serve as a means of both encouraging new affordable housing development in centrally-located and highly-accessible areas of the Village (i.e., close enough to amenities and services so that residents can safely walk to those services even in the winter) and discouraging the development of other forms of housing (i.e., higher-end housing geared to seasonal/recreational home investors) that might otherwise take up important areas and development sites that are ideally/better suited to helping achieve the Village's affordable housing (and age-friendly community) goals and aspirations.



**Recommendation #2:** *The Village is encouraged to establish policy whereby no amendments to the community's Official Community Plan (i.e., land use re-designations) are permitted unless those amendments are designed to meet an identified need for land, development priority and/or target population.*

**Explanation:** the District of Invermere, BC has developed such a policy and has used this policy in conjunction with the Village's identified housing needs and priorities to better negotiate with developers seeking to re-designate their land for future development. In order to implement this recommended policy, the Village will need to develop clear definitions of what constitutes "affordable housing" (i.e., target populations, income levels, and price points) and incorporate those definitions either into the Official Community Plan or an annual official municipal statement of housing needs, priorities, goals and targets.

**Recommendation #3:** *The Village is encouraged to establish policy restricting Strata Title conversions of existing rental units as a means of preventing the future loss of those units to the community.*

**Explanation:** the *Valemount Affordable Housing Needs & Demand Assessment* identified a shortage of available rental properties. This lack of supply can lead to escalating rents, which in turn affects the affordability of those units and may be preventing renters from saving up enough of a downpayment to purchase a home in the community. Pressure for Strata Title conversions of existing rental apartment buildings to condominium ownership is more likely to occur if the proposed ski resort is approved (i.e., in order to satisfy increased demand for seasonal/recreational home investment properties).

### **3.0 Recommendations Aimed at Encouraging the Development of New Affordable Housing**

Preventing the loss of existing affordable housing units will not be enough to address the full range of identified housing needs in Valemount. New construction will also be required. The following is a list of recommended strategies for the Village to consider in order to encourage new affordable housing development.

**Recommendation #1:** *The Village is encouraged to assist non-profit and for-profit developers of affordable housing with taking full advantage of available grants and subsidies for affordable housing.*

**Explanation:** there are a number of grants and subsidies available for various types of affordable housing and target groups through BC Housing, the Government of Canada (e.g., CMHC), and the Columbia Basin Trust (CBT). Building local awareness and helping non-profit and for-profit developers of affordable housing access these grants where appropriate can help to increase the community's supply of affordable housing.



**Recommendation #2:** *The Village is encouraged to develop and implement an Inclusionary Zoning policy that requires a specified percentage (e.g., 10%) of all new housing units be affordable and barrier-free to one or more of the community's affordable housing target populations.*

**Explanation:** sections 903, 904 and 905 of the *Local Government Act, 2015* (LGA) grant municipalities the authority to use Inclusionary Zoning as a tool to require that a certain percentage of all new housing units built in the community be affordable (including affordable to special needs populations – i.e., barrier-free) as a condition of rezoning. Inclusionary Zoning may be one of the most powerful tools the Village has to promote new affordable housing development.

**Recommendation #3:** *The Village is encouraged to develop and implement a Commercial Linkage policy that establishes commercial and industrial requirements and formulas for employee housing.*

**Explanation:** a number of resort municipalities have established requirements and formulas for the provision of employee housing based on the nature and scale of various commercial and industrial activities and operations. Based on these requirements, businesses must either build housing for their employees directly or contribute *cash in lieu* to the municipality (i.e., to support the construction of those units through a municipally-owned housing authority). The Village is encouraged to seek assistance and advice from other resort municipalities for the creation of similar employee housing requirements and formulas.

**Recommendation #4:** *The Village is encouraged to develop and implement a Perpetually Affordable Housing Program.*

**Explanation:** the City of Langford has developed a perpetually affordable housing program whereby, through Inclusionary Zoning, 10% of all new single-family housing units developed in the city must be priced at 60% of market value and made available to households earning less than \$60,000. Resale restrictions are imposed to prevent the homeowners from making a profit on the sale of their homes; thereby keeping that housing *perpetually affordable*. The City provides a range of planning and development incentives to help reduce construction costs and also manages the program. Local realtors and mortgage brokers are also involved in the program.

**Recommendation #5:** *The Village is encouraged to explore the viability of using the tax exemptions provisions provided under Section 226 of the Community Charter to encourage affordable housing development in and around the downtown core.*

**Explanation:** the use of tax exemptions or reductions *could* help to reduce the total annual operating costs of affordable rental housing as well as the total annual costs for low- and modest-income homeowners (including seniors) to remain in and maintain their homes. It may also be possible to establish different levels of tax exemption or reduction for different target populations and income levels. Focusing those tax exemptions and reductions on the downtown core and surrounding residential neighbourhoods could help to encourage more affordable housing development in areas close to important community, commercial, education and health



services. The use of these tax exemptions or reductions *could* also help to offset a portion of the costs required to upgrade unsightly and/or unsafe properties, thereby maintaining the relative affordability of those units after the upgrades have been completed. It is also recommended that the Village make it very clear that each tax exemption or reduction offered is considered a **matching contribution** from the Village (i.e., the property owner is expected to contribute an amount at least equal to the total annualized tax exemption/reduction being offered).

**Recommendation #6:** *The Village is encouraged to conduct a review and inventory of existing municipal land and building assets to determine if and where there is municipal land that could potentially be used to support an affordable housing development.*

**Explanation:** the Village may own vacant and/or under-developed land that could potentially be used for an affordable housing development. If one or more municipally-owned parcels exist within the Village that would be suitable for an affordable housing development, the Village is encouraged to consider offering at least one (1) viable property up for development either as a stand-alone affordable housing project or as a mixed-used development through a Request for Proposal (RFP) process that clearly identifies the target populations and the target affordability levels required. The land could either be sold at a below-market rate or maintained as a long-term lease. The terms of that lease and/or sale could also be adjusted according to the target population(s) and affordability level(s) being achieved (e.g., 75% of market value for affordable entry-level housing geared towards median-income residents or 50% of market value for affordable rental housing geared towards low- and modest-income residents with or without special needs). Furthermore, there may be land currently owned by private landowners, local non-profits, the Provincial government, and/or the Federal government that is suitable for the development of affordable housing and that could either be acquired by the Village or developed in partnership with the Village.

#### **4.0 Recommendations Aimed at Building Additional Community Capacity to Promote Affordable Housing**

Many of the recommendations presented above are what might be considered “pragmatic interventions” (i.e., actions and interventions that can be readily implemented within the Village’s existing capacity, resources and legislative powers). Conversely, “strategic interventions” are those actions and interventions help to create new opportunities and community capacities to promote a greater range of affordable housing Valemount to consider in order to build long-term community capacity to promote affordable housing.

**Recommendation #1:** *The Village is encouraged to post the Valemount Affordable Housing Needs & Demand Assessment final report on its website.*

**Explanation:** posting the *Valemount Affordable Housing Needs & Demand Assessment* final report on the Village’s website will make the information more widely and readily available. Developers who may be interested in developing affordable housing and who have access to information regarding the community’s



housing needs, priorities and target populations are more likely to come forward with viable development proposals on their own.

**Recommendation #2:** *The Village is encouraged to develop and publish annual housing priorities, goals, and targets.*

**Explanation:** the development of annual statements regarding the Village's housing priorities, goals and targets can help to not only encourage the private sector to more actively pursue opportunities to address those needs on its own, it can also support efforts by the Village to require (e.g., through Inclusionary Zoning and other mechanisms) the development of more affordable housing specifically targeted to identified needs rather than leaving it up to the private sector to decide on its own what is needed.

**Recommendation #3:** *The Village is encouraged to explore opportunities to develop new and innovative residential zoning options to encourage affordable housing.*

**Explanation:** updating the Village's *Zoning Bylaw* to include new and better zoning regulations that support a broader range of housing options can help to promote more creative solutions for affordable housing. The Village is encouraged to regard its *Zoning Bylaw* as continually evolving document that can, from time to time, readily incorporate additional land use designations that have proven in other communities to be successful in producing affordable housing.

**Recommendation #4:** *The Village is encouraged to conduct a comprehensive review and feasibility study of the affordable housing best practices identified as part of the Valemount Affordable Housing Needs & Demands Assessment.*

**Explanation:** the *Valemount Affordable Housing Needs & Demands Assessment* identified a wide variety of current and emerging best practices in support of affordable housing. The Village is encouraged to conduct a formal review and feasibility study to determine which of the best practices identified can reasonably be implemented in Valemount given the community's existing capacity, resources and legislative powers.

**Recommendation #5:** *The Village is encouraged to actively recruit recognized, quality non-profit and for-profit affordable housing developers to build a new housing project in the community.*

**Explanation:** local non-profit and for-profit developers may not have the interest, capacity or resources to develop sufficient additional affordable housing to meet each community's identified needs and priorities. Recruiting recognized, quality non-profit and for-profit affordable housing developers to build projects could help to fill an identified capacity gap and could also demonstrate to the local community the different types of quality affordable housing projects that can be achieved. These external developers could also be invited to participate in an RFP process to develop an affordable housing project on land owned by and leased from the municipality.



**Recommendation #6:** *The Village is encouraged to explore opportunities to promote a balanced, regional approach to providing affordable housing in the area.*

**Explanation:** efforts to promote the development of more affordable housing in Valemout could potentially be negated by the lack of effort to do so by other surrounding communities (i.e., residents from surrounding communities searching for affordable housing that is not available in their own communities may be drawn to the Village – thereby increasing the level of affordable housing needs within the Village). Therefore, the Village is encouraged to explore opportunities with other municipalities in the surrounding region (including, but not limited to the Regional District of Fraser-Fort George) to share information, to learn from each other, and to identify and explore opportunities to work together to develop and implement new affordable housing and/or support programs throughout the region.

**Recommendation #7:** *The Village is encouraged to explore and consider creating a Valemout Housing Authority.*

**Explanation:** given the costs to establish and maintain such an organization, the creation of a *Valemout Housing Authority* should only be considered after all other options for municipal regulation, partnerships and support for affordable housing have been implemented. If established, the *Valemout Housing Authority* could be charged with developing new affordable housing (rental and ownership), owning and operating affordable rental housing, and managing a *Perpetually Affordable Housing Program*.

## 5.0 Conclusion and Next Steps

The following are suggested “next steps” for the Village of Valemout to consider in moving these recommendations forward:

1. Conduct an internal review of the recommendations presented above to determine which strategies and priorities have the greatest support and likelihood of success based on the community’s existing capacities and resources and the degree to which those capacities and resources are already devoted to other municipal initiatives and priorities;
2. Once the preferred strategies have been identified, develop a community consultation plan to engage key community stakeholders in further developing and refining the preferred strategies;
3. Develop detailed implementation plans for each preferred strategy that identifies and assigns appropriate roles and responsibilities to a range of community stakeholders (i.e., not just the Village); and
4. Proceed with each implementation plan as it is completed.

